

**BRAY MUNICIPAL DISTRICT
LOCAL AREA PLAN**

**CHIEF EXECUTIVE'S REPORT
ON SUBMISSIONS
MADE TO THE
DRAFT PLAN**



WICKLOW COUNTY COUNCIL
NOVEMBER 2017



PART I: INTRODUCTION

1.1 Introduction

This Chief Executive's Report is submitted under Section 20(3)(c) of the Planning and Development Act 2000 (as amended). It is part of the formal statutory process of the preparation of a Local Area Plan (LAP). This Report contains the following:

- (i) a list of the persons or bodies that made submissions,
- (ii) a summary of the issues raised by them,
- (iii) the opinion of the Chief Executive in relation to the issues raised, and his recommendations in relation to the proposed LAP, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

In accordance with Section 20 (3)(cc) this report is required to summarise the issues raised and the recommendations made by the **NTA** (Submission **A2**) and outline the recommendations of the Chief Executive in relation to the manner in which these issues and recommendations should be addressed in the proposed local area plan.

The members of the planning authority are required to consider the proposal to make the local area plan and this report of the Chief Executive.

1.2 Next steps

Following consideration of this Chief Executive's Report, the local area plan shall be deemed to be made in accordance with the recommendations of the Chief Executive as set out in this Report, **6 weeks after the furnishing of the report to the members**, unless the planning authority, by resolution, decides to either

- (i) make or amend the plan otherwise than as recommended in this report, or
- (ii) not make the plan.

Where, following consideration of the Chief Executive's Report, it appears to the members of the authority that the Draft LAP should be altered, and the proposed alteration would if made be a material alteration of the draft LAP, the Planning Authority shall, not later than 3 weeks after the passing of a resolution, publish notice of the proposed material alteration in one or more newspapers circulating in its area, and send notice of the proposed material alteration to the Minister, the Board and the prescribed authorities (enclosing where the authority considers it appropriate a copy of the proposed material alteration).

In the event that material amendments to the draft plan are proposed, the planning authority shall determine if a Strategic Environmental Assessment (SEA) and/or an Appropriate Assessment (AA) as the case may be, is or are required to be carried out with respect to one or more than one proposed material amendments to the Draft LAP.

The Chief Executive shall, not later than 2 weeks after a determination that SEA/AA of a material amendment is required, specify such period as he or she considers necessary following the passing of the resolution, as being required to facilitate an assessment. The planning authority shall carry out an assessment required of the proposed material amendment of the draft local area plan within the period specified by the Chief Executive.

The planning authority shall publish notice of the proposed material amendment, and where appropriate in the circumstances, the making of a determination that a SEA/AA is required. The planning authority shall carry out the assessment within the period specified by the Chief Executive.

The notice relating to material amendments shall state –

- (i) that a copy of the proposed material amendment and of any determination by the authority that a SEA/AA is required may be inspected during a stated period of not less than 4 weeks, and
- (ii) that written submissions or observations with respect to the proposed material amendment and of any determination by the authority that a SEA/AA is required, may be made to the planning authority and shall be taken into consideration before the making of any material amendment.

1.3 Consultation Process & List of Submissions

The Draft Bray Municipal District Local Area Plan 2017-2023 was on public display during the period 02 August 2017 to 15 September 2017. A Public Open Day was held in Bray Municipal District Office on 16 August 2017 where the public attended and interacted with the plan team.

During the public display period, a total of **2,882** submissions were received. There were a significant number of 'proforma' type submissions as well as individual submission on the same topic, and therefore these have been grouped.

Group A Prescribed bodies

No.	Organisation	Representative
A1	Department of Housing, Planning and Local Government	Niall Cussen
A2	National Transport Authority	Michael MacAree
A3	Department of Culture, Heritage and the Gaeltacht	Yvonne Nolan
A4	Department Of Education	Veronica Kelly
A5	Health and Safety Authority	Tara Horigan
A6	Meath County Council	Wendy Bagnall
A7	Transport Infrastructure Ireland	Michael McCormack

Group B Elected Representatives

No.	Organisation
B1	Deputy John Brady
B2	Deputy Stephen Donnelly
B3	Deputy Andrew Doyle
B4	Cllr Steven Matthews
B5	Cllr Brendan Thornhill

Group C Individual submissions

No.	Group name / Surname	Forename / Representative
C1	Adelaide Road Residents	Brigid O'Brien
C2	Aherne	Conor
C3	Allan	Richard & Anne
C4	Anderson	David
C5	Ashton Wood Residents Association	
C6	Bailey	Elaine

No.	Group name / Surname	Forename / Representative
C7	Balark Trading GP Ltd	Slattery
C8	Ballywatrim & Wingfield Residents Association	
C9	Barnaby Investments Limited	John Murphy
C10	Beckett	Hugh & Joanne
C11	Beralt Developments Ltd	Whelan Alan
C12	Bird	Julia & Graeme
C13	Bluetone Properties Ltd	
C14	Bodenham	Iris
C15	Booth	Stephen & Tracy
C16	Brabazon	John & Anthony
C17	Brady	Carolyn
C18	Bray & District Chamber	Pat O'Suilleabhain
C19	Bray Harbour Action Group	
C20	Bray Harbour Mooring Holders Association Ltd	Tony Foran
C21	Bray Retailers Group	Frank Power
C22	Bray Sailing Club	Mark & Ronan
C23	Bray Sea Scouts	Stephen Carvill
C24	Bray Skateboarding Association	Rob, Alan & Paul
C25	Bray Tidy Towns	Mary Hargaden
C26	Brennan	Sia & Edwin
C27	Brennan	Jack
C28	Brennan & Tsack	Sharon & Sebastian
C29	Brennanstown Riding School Ltd	Jane Kennedy
C30	* O' Keeffe	Breda
C31	Bridgedale Homes Ltd	Oisin Boland
C32	Browne	David
C33	Burrell	Caroline
C34	Burton	Dave
C35	Burton	Lee & Dave
C36	Byrne	James
C37	Byrne	Tracey
C38	Byrne	Pamela, Patrick, Eoin & Cathel
C39	Byrne & Fenlan	Robert & Orla
C39a	Byrne	Michelle Stephens
C40	Cafferkey	Noel & Liz
C41	Cafferkey	Gracie
C42	Cafferkey	Gracie
C43	Cahill	Kevin & Mary
C44	Cairn Homes Plc	Emma Flannagan
C45	Camlin	William D & Ann T
C46	Carlisle Grounds Residents Group	Erica Devine
C47	Carroll	Micheal
C48	Carroll	Melissa

No.	Group name / Surname	Forename / Representative
C49	Chan	Winnie
C50	Chand	Lucy
C51	Chand	Olivia
C52	Chand	Sophie
C53	Chand	S
C54	Clarke	Colin
C55	Clarke	Deirdre
C56	Cocchiglia	Umberto & Janet
C57	* Cavanagh	Margaret M.
C58	Common Ground Housing Cooperative	Máirín Harte
C59	Conneely	Lynda
C60	Connell	Honor & Gerry
C61	Connellan	Carmel
C62	Connolly	Jennifer & Gavin
C63	Conor & Kearns & Family	Joe & Lisa
C64	Conroy	Ger
C65	Conroy	Mary
C66	Cookson	Tim
C67	Corcoran	John
C68	Cosgrave Property Group	Maria Lombard
C69	Costello	MR & MRS Patrick
C70	Costello	Johnaton
C71	Creevey	Suzanne
C72	CRH Estates Ltd (Roadstone)	Aoife Byrne
C73	Crowley	Ben
C74	Crowley	Mark
C75	Crowley	Pauline
C76	Cummins	Charlie
C77	Daly	Ann C
C78	Darcy	Clay
C79	Deady	Gillian
C80	Deep dales Residents Association	Peter Byrne
C81	Delahunty	Brian
C82	Dempsey	Alan
C83	Denver	Ian & Angela
C84	Denvir	Eileen
C85	Deveney	Anna
C86	Devine	Barbara Moore
C87	Devine	David
C88	Devlin	Adam & Jennifer
C89	Dillon	Gabrielle
C90	Dillon	Mary & Paul
C91	Diver	Rosemarie

No.	Group name / Surname	Forename / Representative
C92	DM Properties	Tony Bamford
C93	Doherty	Muriel
C94	Donnelly	John
C95	Doody	David
C96	Dorah	Eileen
C97	Dowling	Fergal & Laura
C98	Dowling	Malcolm
C99	Downes	Anne
C100	Doyle	Colette & Martin
C101	Doyle	Denis
C102	Doyle & Tobin	Ruth & Patrick
C103	Draper Family	
C104	Drew	Rebecca
C105	Driver	Finton & Mark & Margaret
C106	Driver	James & Aisling
C107	Driver	Niall & Cindy
C108	Driver	Pat & Mary & Barry & Niamh & Paul
C109	Duffy	Alan & Samantha
C110	Duggan	Sonya
C111	Dunne	Rosaleen & John
C112	Dunne	Sharon
C113	Dunne	Vivienne
C114	Durnin	Meadbhd
C115	Dutton	Deborah
C116	Endrizzi	Alex
C117	Fennema	Boris
C118	Ffrench	Aidan
C119	Fitzgerald	Fiona
C120	Flanagan	Geraldine
C121	Flavin	Grainne
C122	Flynn	John
C123	Flynn	John
C124	Flynn	Patrick
C125	Flynn	Paul
C126	Foley	Fergal & Linda
C127	Foley	Phyl
C128	Gallagher	Miriam & Chris
C129	Galvin	Bob
C130	Gardiejow	Paulina
C131	Geraghty	Sylvia
C132	Geraghty & Dehantschutter	Dr Davida & Dr Johan
C133	Gerges	MR & MRS Effat
C134	Giles	Delwen

No.	Group name / Surname	Forename / Representative
C135	Giltspur Wood Residents	
C136	Graham	Robert & Ruth
C137	Guilfoyle	Ronan & Caoimhe
C138	Hannon	Eileen
C139	Hannon	Pat
C140	Hardiman	Kevin & Ciara
C141	Harmen	Anthony & Niamh
C142	Harvey	Terence
C143	Hatter	Daniel
C144	Healy	Christine
C145	Heffernan	Sandra
C146	Hegarty	Frank & Marie
C147	Hegarty & Patterson	Narelle & Denis
C148	Henderson	Carmel & John
C149	Hickson	David
C150	Hill	John & Carole
C151	Hoey	Aidan
C152	Hollybrook Park Residents Association	Eamonn Purcell
C153	Holmes	Clíona
C154	Hyland	Claire
C155	Ipina	Mercedes
C156	Jakob	Sonia & Bernhard
C157	Kane	Paul
C158	Kavanagh	Marie
C159	Kearney	Myra
C160	Kelly	Colman
C161	Kelly	Dermot
C162	Kelly	Michael & June
C163	Kelly & Jenkins	Lisa & Christopher
C164	Kennedy	Andrea
C165	Keogh	Sonja Luscher & Mark
C166	Kinlough	Ann & William
C167	Kitson	Brian & Hilary
C168	Knox	Ken
C169	Kosachev	Stanislav
C170	Lamplugh	Avril
C170a	Lane	Rosalind
C171	Lawlor	Michael
C172	Lawlor & Nolan	Sandra & John
C173	Lazarenco	Ion & Angela
C174	Lenehan	Joanna
C175	Lidl Ireland GmbH	David Freeland
C176	Lynch	Alison

No.	Group name / Surname	Forename / Representative
C177	Lynch	Frank
C178	Lynch	Rosemary
C179	Macari	Rosaria
C180	Maguire	John & Margaret
C181	Mannix	Brendan & Amanda
C182	Martello Terrace Bray Residents Association	Isolde Moylan
C183	*removed as not associated with the Bray Plan	
C184	Mason	Cathy
C185	May	Carol
C186	McAteer & Dillon	Michael and Patrick
C187	McCarthy	Anthony & Julieann
C188	McCormick	Jenny
C189	McDonald	Thomas
C190	McGlinchey	Gerard
C191	McHugh & Temple	Enda & Carmel
C192	McLoughlin	Corinne
C193	McLoughlin	Kevin
C194	McManus	Liz
C195	McMichael	Dairina
C196	McMullen	Thomas & Valerie
C197	McNally	Joe
C198	McStay	Catherine
C199	McVeigh	Jim
C200	Melia	Owen
C201	Monahan	Linda & David
C202	Mooney & Family	Mark
C203	Moore	Esther
C204	Moran	Paul & Sinead
C205	Mould	Lorna & Simon
C206	Mulcahy	Dervla
C207	Murphy	Bláithín
C208	Murphy	Ciara
C209	Murphy	Dervla
C210	Murphy	Raymond & Etain
C211	Murphy	Rory
C212	Murphy	Tony & Caroline
C213	Murray	Fionnán & Lisa
C214	Murray	Paul
C215	Murray	Paul
C216	NECHOUKA Ltd	Deirdre Kirwan
C217	Nessbit	Bernie
C218	Nolan	Pat & Sheila
C219	Nolan	Frances

No.	Group name / Surname	Forename / Representative
C220	O'Brien	Dorothy
C221	O'Brien	Emma & Eoin
C222	O'Brien	Jacinta
C223	O'Callaghan	Joseph
C224	O'Caomh	Fia
C225	O'Connor	Antoinette
C226	O'Connor	Edward & Anne
C227	O'Connor	Geraldine
C228	O'Donnell	Phil
C229	O'Dwyer	Rob & Joan
C230	Oehl	Frederic
C231	O'Flaherty	Aoife
C232	O'Halloran	Vincent & Marie
C233	*Sugar Loaf Crescent Residents Association	Patricia O' Leary
C234	O'Leary	Stephen
C235	O'Mahony	Ann
C236	O'Neill	David
C237	O'Neill	Jonathan & Sandra
C238	O'Regan	Rebecca
C239	Ormon	Carol
C240	O'Rourke	Deirdre
C241	Park Developments group	Paul tury
C242	Parsons	Mary Anne
C243	Pempelfort & Longmore	Trish & Dale
C244	Pizarro Developments Ltd	Sadler Trevor
C245	Powderly	John & Elaine
C246	Power	Avril
C247	Prendergast	Pamela
C248	Prendergast	Paul
C249	Purtill	Grace
C250	Pyper	Keith
C251	Quigley	Hugh
C252	Ralph	Nicola & Alan
C253	Redmond	Hazel
C254	REGO Property	
C255	Reihill	Shane & Tanja
C256	RGRE J & R Valery's Ltd	
C257	Robinson	Keith & Maeve
C258	Robinson	Nicholas
C259a	Robinson	Pat
C259b	Robinson	Pat
C260	Roche	Ron & Michele
C261	Rogers	Michelle

No.	Group name / Surname	Forename / Representative
C262	Rooney	Clifton & Sarah
C263	Rooney	Des
C264	Ruddock	Mike
C265	Ryder	Róisín & Andrew
C266	Smith	Veronica
C267	St. Gerards Senior School	Joy Hunter
C268	Stewart & Crisp	Tessa & Peter
C269	Sutton	Diane
C270	Swaine	Anthony & Janet
C271	SWAP	McMaanus
C272	Taylor	Ann & Thomas
C273	Tesco Ireland	Simon Bradshaw
C274	Thomson	Neal & Lesly
C275	Thomson	Peter
C276	Tighe	Kay
C277	TOI ICAV	Gavin Helena
C278	Tolomio & Valasco	Matteo & Teresa
C279	*Ion	Isaic
C281	Valerie	Sarah
C282	Walsh	Deirdre
C283	Walsh	Tara
C284	Weafer	Colin
C285	Wearen	Merrill
C286	Whelan	Barry
C287	Whelan	Linda
C288	Whelan	Saoirse
C289	Whelan	Tiarnan
C290	Windsor	Marc
C291	Wolahan	Kevin
C292	Wylie	Lesleyann & Eoin
C293	Zauka	Jesse
C294	Zemsky	David & Veronika
C295		Lucy & Herry
C296	O'Brien	Brigid

Within this set of 296 individual submissions, 245 address only 2 topics – (1) Proposed zoning at Kilruddery and (2) proposed zoning at Oldcourt – Giltspur.

Group D Charnwood / Giltspur proforma
Group E Road at Kilmacanogue proforma No. 1
 Road at Kilmacanogue proforma No. 2
 Road at Brennanstown proforma No. 1
 Road at Brennanstown proforma No. 2

In light of the number and nature of submissions received, this report will be set out as follows:

SECTION 3.1:	Prescribed Bodies
SECTION 3.2:	Elected Representatives
SECTION 3.3:	Zoning at Kilruddery
SECTION 3.4:	Zoning at Oldcourt House
SECTION 3.5:	Road and greenway objectives Kilmacanogue
SECTION 3.6:	Former Golf Club Lands
SECTION 3.7:	Overall Strategy
SECTION 3.8:	Residential Development
SECTION 3.9:	Economic Development
SECTION 3.10:	Centres and Retail
SECTION 3.11:	Community Development
SECTION 3.12:	Tourism & Recreation
SECTION 3.13:	Harbour and Seafront
SECTION 3.14:	Infrastructure
SECTION 3.15:	Built and Natural Heritage
SECTION 3.16:	Opportunity Sites
SECTION 3.17(a):	AA1 - Fassaroe
SECTION 3.17(b):	AO Smith
SECTION 3.17(c):	SL02 Rehills
SECTION 3.17(d):	SLO 4 Dell
SECTION 3.17(e):	SLO 5 Bray Gateway and Transportation Hub (GTH Zone)
SECTION 3.17(f):	SLO 6 Employment Land Boghall Road- Bray SCR
SECTION 3.18:	Zoning
SECTION 3.19:	Miscellaneous
SECTION 3.20:	Enniskerry
SECTION 3.21:	Kilmacanogue
SECTION 3.22:	Kilmurray

1.4 Considering the Submissions

The written submissions have been analysed by the Planning Executive of the County Council. The submissions are summarised and the opinion and recommendations of the Chief Executive have been given in Part III. The Chief Executive has made a number of recommendations, they are outlined in Part II in the order that they would appear in the LAP. Amended / new text in red, deleted text in ~~blue~~

This Report is submitted to the Members for their consideration.

1.5 Guidance for the Elected Members

Responsibility for approving a local area plan, including the various policies and objectives contained within it, in accordance with the various provisions of the Planning and Development Act 2000 (as amended) rests with the elected members of the planning authority, as a reserved function under Section 20 of the Act.

In making the local area plan, the elected representatives, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the "Code of Conduct for Councillors" prepared under the Local Government Act 2001, carry out their duties in this regard in a transparent manner, must follow due process and must make their decisions based on relevant considerations, while ignoring that which is irrelevant within the requirements of the statutory planning framework.

The members, following consideration of the draft plan and this report, shall decide whether to adopt the local area plan or to amend the plan.

PART II: CHIEF EXECUTIVE'S RECOMMENDED AMENDMENTS

Recommendation No. 1

Source: DHPLG

Amend Section 2.2.3 'Population and Housing' as follows:

2016 Population

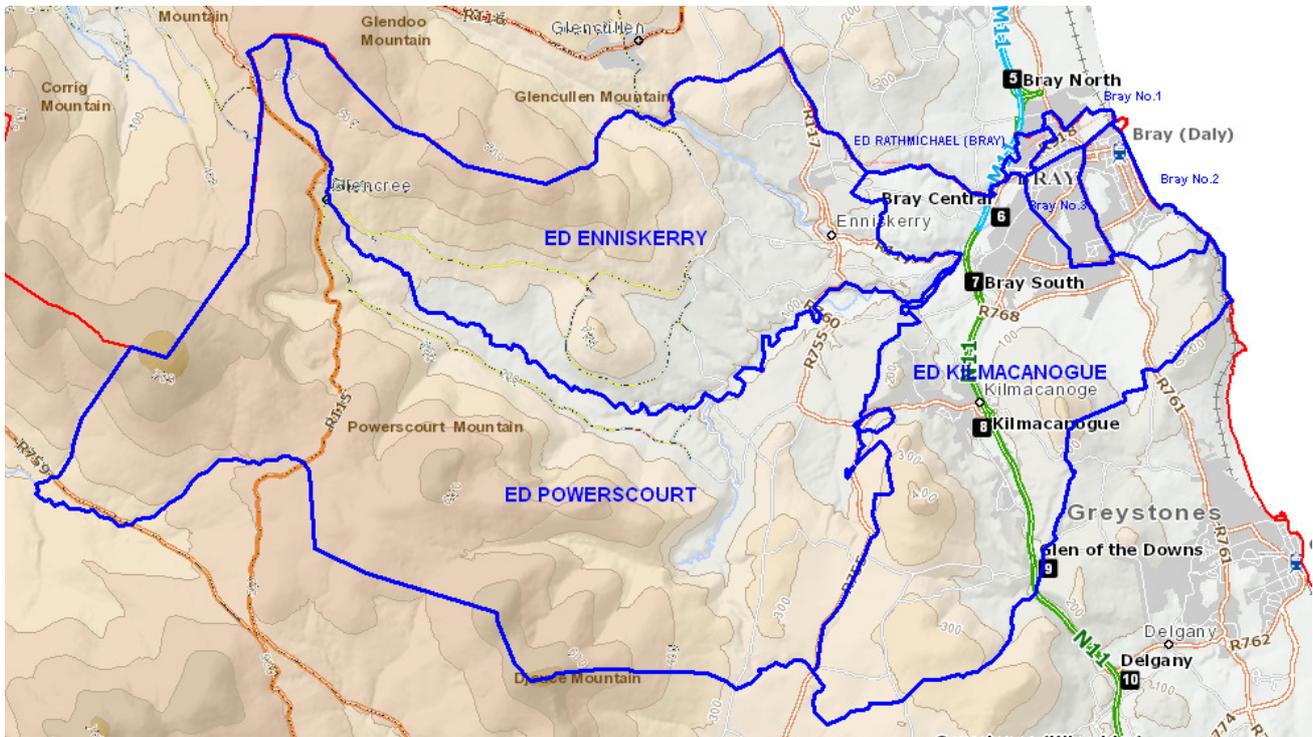
The population of the Bray MD in 2016 was 35,530 persons, showing a slight increase of 3.5% from the 2011 population (34,335). This Municipal District is made up of 7 'electoral divisions' and the population is broken down as follows:

Table 2.1 Population of Bray MD and associated Electoral Divisions 2006, 2011 and 2016

	2006	2011	2016	2016 Housing Stock
Bray No. 1	1700	1746	1845	837
Bray No. 2	6305	6192	6410	2622
Bray No. 3	6557	6424	6481	2659
Rathmichael (Bray)	2431	2380	2418	850
Kilmacanogue	13772	14043	14694	5031
Enniskerry	2696	2765	2894	990
Powerscourt	773	785	788	301
Total	34,234	34,335	35,530	13,290

Source: CSO

Map 2.1 Bray MD Electoral Divisions



As well as providing data at the MD and ED geographical unit, the CSO also provides the result expressed in units such as 'legal towns', 'towns and their suburbs / environs' and 'small areas'.

Town data

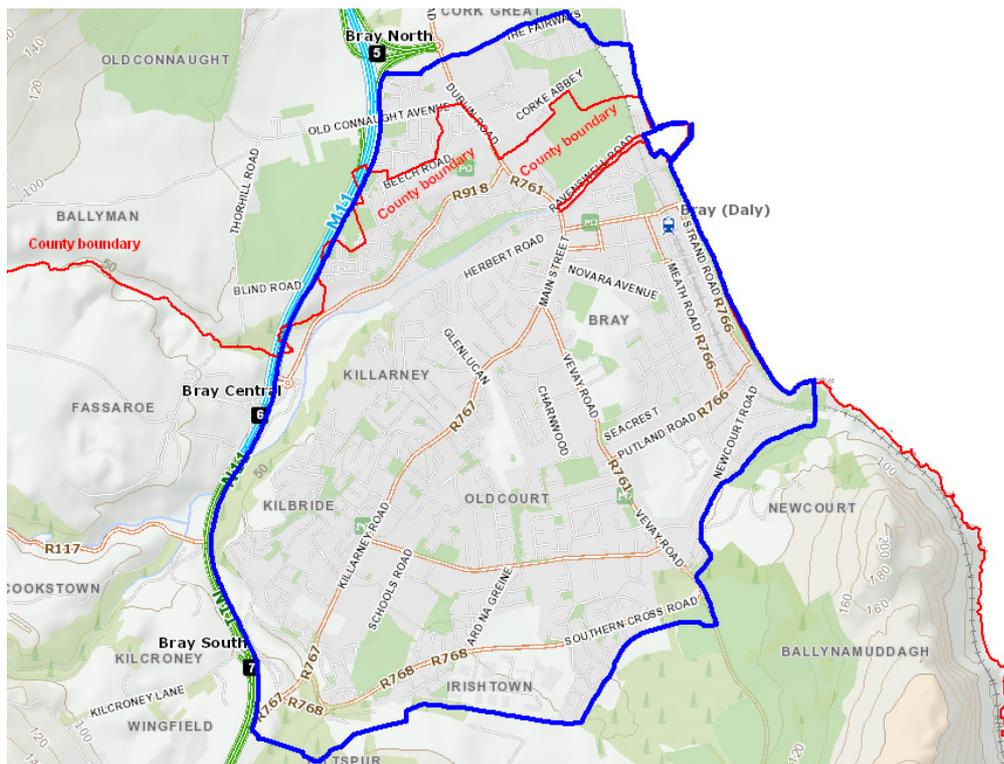
Bray

Table 2.2 Population of Bray 'town', 2006, 2011 and 2016

	2006	2011	2016*
Bray (legal town)	27,041	26,852	-
Bray & suburbs / environs (in Wicklow)	28,814	28,592	
Bray & suburbs / environs (Wicklow + DLR)	31,901	31,872	
Bray (new 2016 boundary defined)			32,600

With regard to the 2016 figure, the CSO states the following: '80 legal towns were abolished under the Local Government Reform Act 2014. Census towns which previously combined legal towns and their environs have been newly defined using the standard census town criteria (with the 100 metres proximity rule). For some towns the impact of this has been to lose area and population, compared with previous computations'.

Map 2.2 2016 CSO definition of boundaries of 'Bray'

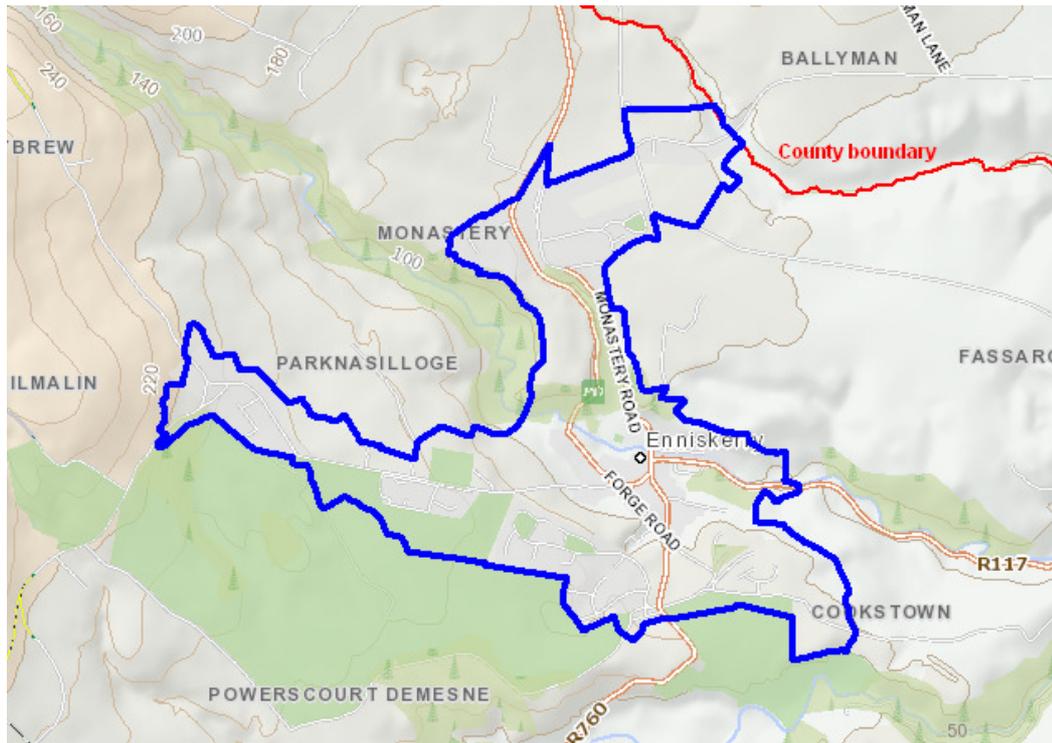


Enniskerry

Table 2.3 Population of Enniskerry 'town', 2006, 2011 and 2016

	2006	2011	2016
Enniskerry town¹	1881	1811	1889

Map 2.3 2016 CSO definition of boundaries of 'Enniskerry'



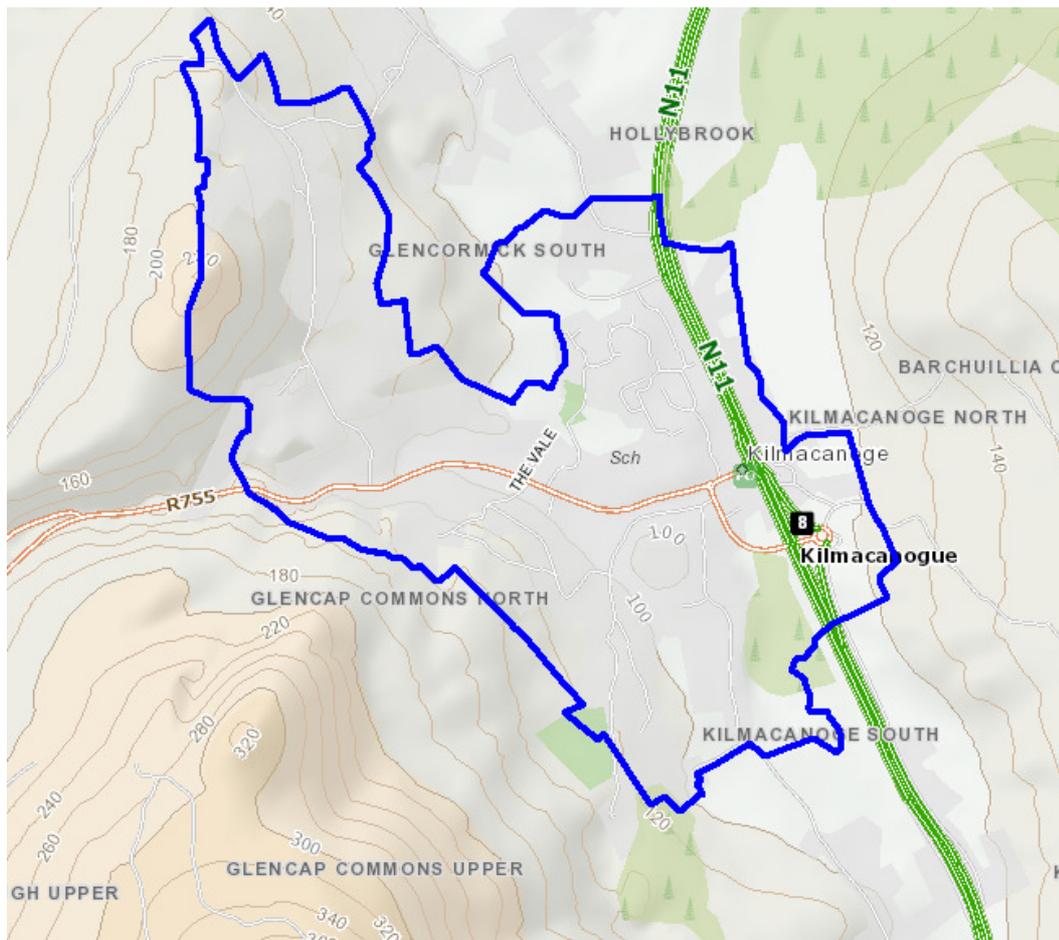
¹ 'Town' as defined by the CSO

Kilmacanogue

Table 2.4 Population of Kilmacanogue 'town', 2006, 2011 and 2016

	2006	2011	2016
Kilmacanogue town²	839	1028	1042

Map 2.4 2016 CSO definition of boundaries of 'Kilmacanogue'



² 'Town' as defined by the CSO

Estimates of 2016 population, based on plan boundaries

Each ED is broken into a number of smaller units, called 'small areas'. It is not considered necessary to display this level of detail in this plan, but the data provided by the 'SAPS' are essential for estimations of current population in each of these settlements, as none of the ED or 'town' boundaries and associated population data aligns with the town boundaries used in this LAP.

Using the ED and SAPS data (taking a 'best fit' approach³), and cross referencing it with the GeoDirectory, the estimated 2016 populations of each settlement in the plan area is:

Table 2.5 2016 Population and Housing Stock in Bray MD area, by settlement

	Bray	Enniskerry	Kilmacanogue	Rural Area
2016 population	29,624	1,889	799	3365
2016 Housing Stock	11,225	640	320	1,105

Source: Forward Planning Unit, WCC

Population & Housing growth targets

The 2022, 2025 and 2028 population targets for the settlements in the Bray MD are provided in the Core Strategy of the County Development Plan – the County Development Plan does not provide a target for the overall MD or for rural areas.

Table 2.6 Population Targets for settlements in Bray MD – 2022, 2025 and 2028

Settlement	2022	2025	2028
Bray	36,237	38,119	40,000
Enniskerry	2,302	2,401	2,500
Kilmacanogue	897	923	950

Source: Wicklow County Development Plan 2016

As set out in the Wicklow County Development Plan, it is never possible to manage growth in any particular settlement to come in at an exact population figure at a set time, which is 2028 for the purposes of the County Development Plan. As development in 3 of the 6 growth towns, representing towards 35% of the projected County growth, is reliant on the cooperation and financing of Transport Infrastructure Ireland (formerly National Roads Authority and the Railway Procurement Agency), as is the case in Bray, or Irish Water (as is the case in Arklow and Blessington), it is not possible to predict this with any accuracy whatsoever. The town population allocations set out above have thus incorporated 'compensatory headroom' of 15% to accommodate this uncertainty and to ensure that there will be sufficient capacity in other settlements if some growth towns are unable to deliver the necessary infrastructure to service their projected populations.

While this plan will have a duration of 6 years initially, ~~up to 2023~~, the provisions of the Planning Act allow in certain circumstances for the duration of local area plans to be extended to 10 years ~~i.e. up to 2027~~. It is considered likely that between ~~2017~~ 2018 and 2022 (date of the next County Development Plan) that the population targets for the County and this MD will be revised in light of the findings of Census 2016 and the

³ That is, using that set of SAPS that most closely match each settlement boundary in this plan

provisions of the new National Planning Framework (NPF)⁴ and the Regional Spatial and Economic Strategy (RSES). In this uncertain context, it is considered appropriate at this stage that the plan shall put in place a structure to meet the short term 6 year target only, with ~~2 years~~ 1 year 'headroom'. "Headroom" or "market factor" which is 'extra' land that is zoned over and above the minimum amount needed to accommodate the 2023 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise. Therefore the population and housing unit targets for 2025 are utilised in this plan.

Table 2.7 Housing Stock growth target up to 2025 in Bray MD area, by settlement

	Bray	Enniskerry	Kilmacanogue	Rural Area
2016 population	29,624	1,889	799	3,365
2016 Housing Stock	11,225	640	320	1,105
2025 HS target	17,651	1,112	428	-
Growth	6,426	472	108	-

This plan includes details regarding the capacity of zoned lands for housing. The estimated potential number of additional units indicated for each piece of land is indicative only. The actual amount of units that may be permitted on a site will be determined having regarded to all normal planning considerations, such as access, site services, topography, flooding, heritage issues etc. However, in accordance with Objective HD5 of the County Development Plan, in order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands.

Settlement	Population 2011	Housing Stock 2011	Population 2025	Housing Stock 2025	Housing stock growth required
Bray	29,339	11,518	38,119	17,651	+6,133
Enniskerry	1,940	642	2,401	1,112	+470
Kilmacanogue	799	277	923	428	+151
Kilmurray		28			+6⁵

⁴ The draft NPF was published during the writing of this report

⁵ In accordance with Chapter 3 of the Wicklow County Development Plan, indicative growth target for such 'rural clusters' during the six year lifecycle of County Development Plan is in the order of 4 units.

Recommendation No. 2

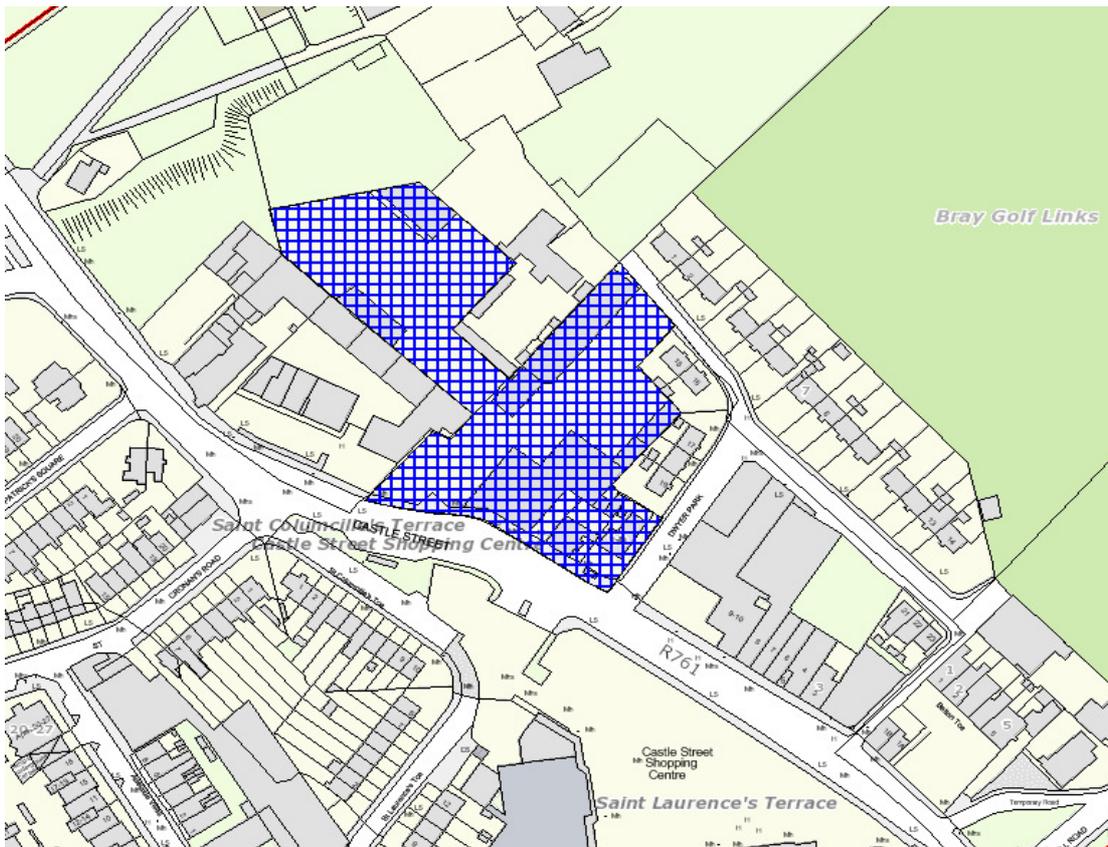
Amend **Chapter 5** as follows:

CHAPTER 5 TOWN / NEIGHBOURHOOD CENTRES & RETAIL**5.3 Bray Town Centre Specific Objectives**

- BT2** To promote and support the development of significant new retail, retail services, commercial and cultural / community floorspace in Bray ~~town centre~~, at the following locations:
- the 'Florentine Centre'(see Objectives for 'Opportunity Sites' to follow)
 - Former Bray golf club lands (see Objectives for SLO 3)
- BT3** Generally, a ~~maximum~~ height of ~~3-storeys above ground level~~ **4 storeys** will be considered appropriate in ~~the~~ Bray 'town centre' ~~zone~~, irrespective of adjoining property heights. However, the Council may permit heights above this, where the specific context of the site and the design of the building allow it (for example where additional storeys are set back from street frontage).

Recommendation No. 3

Source: C11, C21

Amend **Chapter 5** as follows:**CHAPTER 5 TOWN / NEIGHBOURHOOD CENTRES & RETAIL****5.5 Bray Opportunity Sites****OP2 Former Heiton Buckley's, Dublin Road**

These 'town centre' zoned lands measure c. 0.6ha (including all existing buildings thereon) and have road frontage onto Castle Street and Dwyer Park. At the time of the crafting of this plan, the existing buildings and associated yards were vacant. The site is suitable for a high intensity mixed commercial and residential development.

Objectives OP2

- To provide for a mixed use development including commercial, retail, residential, community and cultural uses;
- Active commercial, community or cultural uses will generally be required at ground and street levels, with residential use above, other than (a) along the Dwyer Park frontage and (b) on the truncated northernmost sector of the site.
- A high density development, that makes the best use of this serviced urban land will be expected, with a plot ratio of not less than 2, in a 3-4 storey development;

- The design (including height) of any development shall pay particular regard to the height of immediately adjoining (mostly 2-storey) residences and in general heights shall not exceed 3-storeys along Dwyer Park;
- Any development on the lands shall include street frontage directly onto Castle Street, ideally with limited set back across the frontage of the site; (other than that required for adequate pedestrian / cyclist usage); any set back in excess of 5m from the road kerb will require to be justified based on specific design criteria and in any event buildings shall not be set back any further than 15m from the kerb.
- Those parts of any proposed development that adjoin existing streets shall provide for an active street frontage **that addresses and connects with the public domain;** ~~in particular, where residential use is the ground floor use, front doors and façade shall active commercial use shall be expected at ground floor, opening onto the street.~~

OP3 Former Everest Centre, Dublin Road



These 'town centre' zoned lands measure c. 0.16ha and have road frontage onto Castle Street, close to the Dargle Road junction. At the time of the crafting of this plan, the site was vacant, all former buildings having been demolished. This is an important site, forming the northern bookend to the Castle Street commercial area and being located immediately adjoining the likely main route into the golf course development to the east. The site is suitable for a high intensity mixed commercial and residential development.

Objectives OP3

- To provide for a mixed use development including commercial, retail, residential, community and cultural uses;
- A high density development, that makes the best use of this serviced urban land will be expected, with a **high plot ratio of not less than 2 in a 3-4 storey development;**
- Any development on the lands shall include full street frontage across the majority of the site onto Castle Street, ideally with limited set back across the frontage of the site; (other than that required for adequate pedestrian / cyclist usage); any set back in excess of 5m from the road kerb will require to be justified based on specific design criteria and in any event buildings shall not be set back any further than 15m from the kerb.

- Those parts of any proposed development that adjoin Castle Street shall provide for an active street frontage; in particular, active commercial use shall be expected at ground floor, opening onto the street.

Recommendation No. 4

Source: DES

Amend **Chapter 6** as follows:

CHAPTER 6 COMMUNITY DEVELOPMENT

The provision of an adequate community infrastructure is critical to facilitate and sustain the growth of the Bray Municipal District County over the lifetime of the plan and beyond. The community development and infrastructure strategies, objectives and standards set out in the Wicklow County Development Plan will apply directly in the Bray MD. In particular, the County Development Plan addresses:

- **The role of land use planning in community development; link between land use planning and the Local Economic & Community Plan (LECP)**
- **Community Facilities Hierarchy Model**
- **Education and Development**
- **Health, Care and Development**
- **Childcare and Preschool**
- **Community Centres**
- **Culture & the Arts, including libraries and places of worship and burial**
- **Open space, Leisure and Recreation, including sports, children's play, facilities for teenagers and young adults**

It is not considered necessary to re-state the majority of the objectives for these areas in this plan; however, a priority concern in the Bray MD is the provision of adequate Open space, Sport and Play facilities **and schools (particularly in areas designated for significant growth)**, and therefore this issue is addressed to follow.

Add new **Section 6.2**

The Bray MD is generally well provided with educational facilities, there being a total of 15 primary schools, 7 secondary schools⁶ and one institute of third level education in the district

Primary Schools

School name	Zoning	Area (Ha)
St. Philomena's / Ravenswell ⁷	MU	3
St. Peter's	CE	0.6
St. Patrick's	CE	2.2
St. Cronan's	CE	1.4
Gaelscoil Ui Cheadaigh Bre	CE	0.2
New Court	CE	2.4
St. Andrew's	CE	
Scoil Chualann	CE	0.6
St. Fergal's	CE	2.3
Bray School Project	CE	0.9

⁶ Plus 2 additional secondary schools very close by in Co. Dublin – St.Brendan's/Woodbrook and St. Gerard's.

⁷ This school is relocating to a newly build campus on the old Bray golf course. The land may become viable for an alternative use thereafter and therefore has been zoned 'Mixed Use'

Marino School	CE	0.75
St. Mary's & St. Gerard's	CE	0.6
Powerscourt	CE	0.8
St. Patricks (Curtlestown)	Rural	0.3
St. Mochonog's	PZ	1.1

Secondary Schools

School name	Zoning	Area (Ha)
Presentation College	CE	7.5
Loreto	CE	5.4
Colaiste Raithin	TC	Due to relocate 2017 to new school on former Bray GC
St. Killian's	CE	3.4
North Wicklow Educate Together	MU	Temporary location on former grounds of Pres
New Court	CE	Shared with St. Andrew's
Marino School		

Third Level Education

School name	Zoning	Area (Ha)
Bray Institute of Further Education	CE	4.7 - Former St. Thomas's Community College
Bray Institute of Further Education	TC	Town campus

Additional lands zoned / identified for school expansion / new schools

School name	Zoning	Area (Ha)
St. Philomena's + Colaiste Raithin	MU	5 - Former Bray GC
AA2 Enniskerry	CE	1.4
Surrounding Powerscourt NS	CE	0.7
Fassaroe neighbourhood centre	CE	5
Fassaroe south / west	R-HD	1.6

Education Objectives

- ED1** To facilitate the provision of schools by zoning suitable lands capable of meeting the demands of the projected populations.
- ED2** Where lands are zoned for educational use, to facilitate the development of facilities that provide for linkages between schools types. For example, particular encouragement will be given to primary and secondary school campuses, the linking of pre-school services with primary schools and the linking of secondary schools with vocational training facilities.
- ED3** Where lands are zoned for employment use, to facilitate the development of employment training facilities (privately and/or publicly funded).
- ED4** Where practicable, education, community, recreational and open space facilities shall be clustered. However schools shall continue to make provision for their own recreational facilities as appropriate
- ED5** To facilitate and promote the use of education facilities after school hours / weekends for other community and non-school purposes, where possible.
- ED6** To facilitate and promote the continuation and expansion of rural/village primary schools.

Recommendation No. 5

Source: NTA

Amend **Section 8.1** as follows:

8.1 Roads & transportation

While the overarching rationale for the production of a development plan is to guide land-use, the integration of good land use planning with transportation is a key that can unlock significant improvements in the quality of life, in ways that are tangible to many in the District, who have long identified car dependency and commuting as being a major drawback to living in the area. Reducing the need to travel long distances by private car, and increasing the use of sustainable and healthy alternatives, can bring multiple benefits to both our environment and communities.

The Council will continue to provide for all components of the transportation system which are within its own remit and will encourage and facilitate the development of those other elements provided by external agencies, such as the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII, made up of the former NRA and RPA). In addition the strategy and objectives of this plan are required to be consistent with the transport strategy of the NTA.

It is therefore the strategy of this plan to craft land use policies to produce settlements of such form and layout that facilitates and encourages sustainable forms of movement and transport, prioritising walking, cycling and ~~bus transport~~ public transport. In this regard, the Council is particularly guided by the strategies and objectives of the transport authorities, namely the National Transport ~~Agency~~ Authority and Transport Infrastructure Ireland. At the time of the publication of this draft plan, a number of transport studies had been completed or were in train that directly affect the Bray MD area, in particular:

- NTA Greater Dublin Area Transport Strategy 2016-2025
- TII M11/N11 Corridor Study (April 2017)
- ~~Local Transport Plan for~~ Bray & Environs Local Transport Study (NTA, in progress)

In particular, this plan has been crafted with the following goals in mind:

- To promote development that facilitates the delivery of improved local transport links within towns (such as feeder buses to train stations), between towns and in rural areas;
- To promote development that delivers improvements to public transport services, in particular the upgrading of the Dublin – Rosslare train line, improved DART Services, bringing the LUAS or other mass transit to Bray and Fassaroe and the development of improved bus services;
- To allow for the improvement or provision of new walking and cycling facilities throughout the District;
- To facilitate the improvement of the existing road network, ~~to remove bottlenecks and increase free flow;~~ to maximise the number of people who can move within the Municipal District and between the Municipal District and other centres of population and activity;
- To improve east – west linkages in the District particularly by walking, cycling and public transport; and
- To improve facilities for pedestrians and access for people with special mobility needs.

Recommendation No. 6

Source: NTA

Amend **Section 8.1.2** as follows:

8.1.2 Public Transport

Wicklow County Council recognises the progress made in the national public transport network over the past number of years, while acknowledging that deficiencies still exist within the Bray Municipal District and the wider County.

The key to getting people out of their cars and into public transport is to have a reliable, convenient, frequent and fast service available, that brings people to the places they want to go, and in the case of the Bray MD this will primarily mean into (1) Bray town centre, to the transport hub at Bray train station and the main employment zones in Bray that are outside the town centre, such as along the Southern Cross Road and (2) Dublin, namely Dublin city centre, Sandyford and the M50 ring (~~pending the rebalancing of employment and retail opportunities into Wicklow~~).

While Wicklow County Council is not itself a public transport provider, and cannot force providers to deliver services in any particular area, development plans can put in place the necessary policy framework to encourage and facilitate the improvement of public transport.

Public Transport Objectives

PT2 ~~To support the NTA in the crafting of a **Local Transport Plan** for the Bray area and to facilitate the implementation of measures contained therein.~~ To support and facilitate the implementation of measures to improve overall accessibility, public transport and walking / cycling opportunities within the Municipal District and between the Municipal District and other centres of population and activity identified in the Bray and Environs Local Transport Study, currently being undertaken by the NTA, Wicklow County Council and TII.

PT7 To promote the delivery of improved and new bus services both in and out of the District but also within the District by:

- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);
- **facilitating the provision of bus priority where a requirement for such is identified by the NTA;**
- requiring the developers of large-scale new employment and residential developments in Bray that are distant (more than 2km) from train / LUAS stations to fund / provide feeder bus services until public bus services have been extended to that location.

Recommendation No. 7

Source: NTA

Amend **Section 8.1.3** as follows:

8.1.3 Cycling and Walking

There are a number of factors that will influence whether one will walk or cycle to a destination (rather than taking the car), including distance, weather, safety, topography, bicycle parking facilities and the availability of car parking at the destination. A land-use plan cannot influence many of these factors, but through the implementation of the following objectives, it is intended that facilities will be significantly improved, thereby promoting these forms of transport.

Cycling and Walking Objectives

- CW1** To improve existing or provide new foot and cycleways on existing public roads, as funding allows, and to facilitate the development of a cycling and walking amenity routes throughout the District **in accordance with the NTA's "Permeability Best Practice Guide"** including foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination (be that town centre, schools, community facilities or transport nodes), while ensuring that personal safety, particularly at night time, is of the utmost priority.
- CW2** To require all new regional and local roads to include foot and cycleways, except in cases where shared road space is provided⁸.
- CW3** To continue to cooperate with the NTA in the implementation of the Greater Dublin Area Cycling Network Plan
- CW4** To ensure that cycle infrastructure provided in the Bray MD is delivered in a manner consistent with the National Cycle Manual

⁸ Streets where real and perceived barriers to movement within and between modes of transport are removed to promote improved interaction between users in a safe and traffic calmed environment.

Recommendation No. 8

Source: NTA

Amend **Section 8.1.4** as follows:

8.1.4 Public Roads**Objectives for regional and local roads**

- To maintain / upgrade and provide new regional and local routes as may be necessary, in accordance with the Principles of Road Development as set out in Section 5.8.3 of the Transport Strategy with overall objective to:
 - Develop orbital roads around town centres accompanied by and facilitating enhanced public transport, cycling and pedestrian facilities in the relevant centre
 - Develop appropriate road links to service development areas
 - Enhance pedestrian and cycle safety through the provision of safer road junctions, improved pedestrian crossing facilities and the incorporation of appropriate cycle measures including signalised crossings where necessary;
 - Address localised traffic delay locations, in cases where the primary reason for intervention is to address safety or public transport issues at such locations;
 - Implement various junction improvements and local reconfigurations on the regional and local road network.

Regional Roads: Regional roads play a key role in the future development of the District, by linking the principal towns and villages to each other, serving local traffic and providing access to the national road network within the County.

Local Roads: Local roads provide the principal circulation networks through the District, meeting the needs of local journeys and providing connections to higher order routes. The 'Design Manual for Urban Roads and Street's (March 2013) set out the following street hierarchy and functions for roads within urban areas:

Arterial Routes: These are the major routes via which major centres/nodes are connected. They may also include orbital or cross metropolitan routes within cities and larger towns.

Link Roads: These provide the links to *Arterial* streets, or between *Centres, Neighbourhoods, and/or Suburbs*.

Local Roads: These are the streets that provide access within communities and to *Arterial* and *Link roads*.

Rural local roads serve an important function providing access to rural properties and agricultural lands within the countryside while also providing linkages to regional and local collector roads.

Recommendation No. 9

Source: DCHG

Amend **Chapter 9 Built & Natural Heritage** as follows:

Section 9.1

9.1 Architectural Heritage

Record of Protected Structures: A 'protected structure' is any structure or specified part of a structure, which is included in the RPS. The purpose of the RPS is to protect structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. Every development plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such interest within its functional area.

The placing of a structure on the RPS seeks to ensure that the character and interest of the structure is maintained and any changes or alterations to it are carried out in such a way as to retain and enhance that character and interest. The inclusion of a structure in the RPS confers certain responsibilities upon the owner of the structure and requires that planning permission be sought for any changes or alterations to the structure. The definition of a 'structure' or 'a specified part of a structure' for the purpose of the RPS includes "the interior of the structure; the land lying within the curtilage of the structure; any other structures lying within the curtilage of that structure and their interiors; and all fixtures and features which form part of the interior or exterior of the structure". From the date of notification of an intention to include a structure in the RPS, the owner has a duty to protect that structure from endangerment. The Council may, on receipt of a written request from the owner or occupier of a protected structure, issue a declaration under Section 57 of the Planning and Development Act 2000 (as amended), outlining certain works it considers would not materially affect the character and interest of the protected structure and which are, therefore, exempted from the requirement for planning permission. Any works that would materially affect the character and interest of a structure require planning permission. In general works to a protected structure should comply with the **statutory** guidelines as set out in the 'Architectural Heritage Protection Guidelines for Planning Authorities' (2004, 2011) ~~from the Department.~~

AH5 To maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts of the setting and character ~~of the demesne.~~

Recommendation No. 10

Source: DCHG, C7

Amend **Chapter 9, Section 9.3** as follows:

9.3 Green Infrastructure & Recreational Use of Natural Resources

Green Infrastructure (GI) can be broadly defined as '*an interconnected network of green space that conserves natural ecosystem values and functions and provides associated benefits to human populations. Green Infrastructure is the ecological framework needed for environmental, social and economic sustainability – in short it is a nation's natural life sustaining system*'⁹. Green infrastructure can include varying land uses - pasture lands, croplands, woodlands, heath, bog, scrubland, quarries, parks, formal and informal green spaces, active and passive spaces, areas around domestic and non-domestic buildings, brownfield areas, waterways, waterbodies, waterway corridors, wetlands, coastal areas, and community/institutional lands such as hospitals, schools, graveyards, allotments and community gardens. Heritage sites, Natura 2000 sites and NHAs are also important GI sites.

The key benefits of green infrastructure elements are as follows:

- recreation & health,
- biodiversity & natural resources,
- coast, water resource and flood management,
- sense of place – appreciation of landscapes and cultural heritage,
- climate change adaptation and mitigation,
- economic development,
- social inclusion, and
- productive environments – food, fibre, energy.

This plan is accompanied by a Green Infrastructure audit (See mapGI1) which has informed the zoning provisions and objectives of this plan.

The Council is committed to ensuring sustainable recreational use of the outdoors in County Wicklow in accordance with the objectives of the current County Wicklow Outdoor Recreational Strategy and in consultation with the Wicklow Uplands Council. Natural areas provide opportunities for passive and active activities such as picnicking, walking, mountain biking, swimming, fishing and sailing / canoeing / windsurfing.

Green Infrastructure Objectives

- GI1** New development and redevelopment proposals, where considered appropriate, are required to contribute towards the protection, management and enhancement of the existing green infrastructure assets and corridors of the local area in terms of the design, layout and landscaping of development proposals.
- GI2** To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, Natura 2000 sites, nature reserves and other distinctive landscapes as focal features for linkages

⁹ Source Comhar Sustainable Development Council 'Creating Green Infrastructure for Ireland', August 2010

between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.

- GI3** To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 10m along watercourses should be provided (or other width, as determined by the Planning Authority) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board "Requirements for the protection of fisheries habitat during the construction and development works at river sites". New river / watercourse road crossings and / or piping shall be strongly resisted except for reasons of overriding public health and safety.
- GI4** To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, **where considered to be viable, safe and in line with sound arboricultural management**, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan.
- GI5** To promote the development of a series of major open spaces and recreational areas linked by green corridors where feasible (See map GI1), in the Bray MD area as follows:
- along the south bank of River Dargle from Bray Harbour, as far as Rehills (SLO-2);
 - on the former Bray golf course lands / Ravenswell Road, linked to harbour and north beach to the east and the People's Park to the west; ;
 - From Bray Head, down to the Esplanade, and up through Bray Harbour, to the north beach;
 - On the Kilruddery estate as part of SLO-1 linking along the Swan River, through the OS to the west of Hollybrook Park; from the Bray SCR, through lands zoned for employment use onto the Boghall Road; continuing through new and proposed residential areas onto Herbert Road and onto the River Dargle; in particular, (a) any new development at or in the vicinity of Oldcourt House shall make provision for the continuation of the green corridor between Giltspur Brook and Rycroft; (b) any infill development along Herbert road adjacent to the green corridor shall make provision for green link between Herbert Road and the Dargle corridor.
 - In the new development zone of Fassaroe west of the N11, linking river valleys to the north and south of the action area ;
 - A linked area from Enniskerry GAA, through the open space in Action Area 2, connecting to Knocksink Wood / Glencullen River, through the Bogmeadow recreational area, and onto the Cookstown River.

The exact route for these developments is not yet known so detailed ecological assessment for impacts on important ecological features, including general ecological impact assessment and specifically Appropriate Assessment, is best carried out when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

Recommendation No. 11 **Source: DES, DCHG**

Amend **Chapter 10, Action Area 1 Fassaroe** as follows:

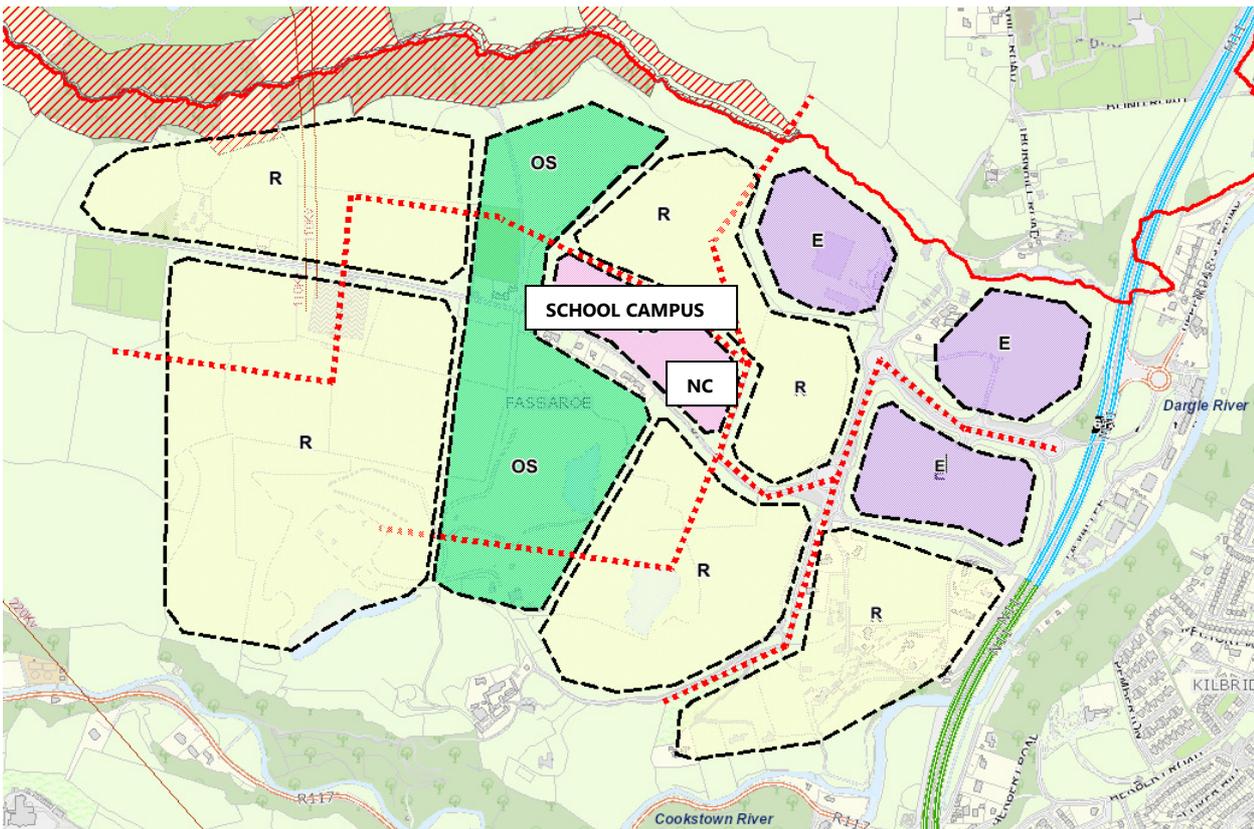
Action Area 1: Fassaroe

Fassaroe is identified as the location of major development in Bray; the growth of the settlement in accordance with regional plan targets is contingent on the delivery of the major residential and community services development at this location, there being no other suitable lands in the environs of Bray for such large scale development.

While a large part of the lands that are the subject of this action area were zoned in previous plans, and on foot of such zonings, a masterplan produced and agreed, that masterplan is now moot as the development requirements and expectation for this lands has been revised in light of changed circumstances and additional research.

The new 'concept plan' for Fassaroe is set out on the sketch to follow, the land use zones shown on Land Use Map No. 2 reflect this layout. Key parameters that have lead to this concept include:

- Existence of a Natura 2000 site along the northern boundary (Ballyman **Glen** SAC); development will be suitable set back from this site and lands reserved for passive open uses;
- The necessity of a link road through the area from Bray directly to Enniskerry; the provision of such a road could provide an alternative link to Enniskerry, allow for adjustment to the existing main access road to Enniskerry from the N11, the R117;
- While plans for LUAS extension to Bray have undergone a number of revisions, the plan should retain the possibility of LUAS extension to and stabling in Fassaroe;
- The area will require a new, central 'village centre' which will provide for both the retail and services needs of the resident population but will also include a school campus;
- The need for a significant new open space facility to serve both the future residents of the area and the wider area; significant parts of the area were formerly used for aggregate extraction and for land filling and such areas are considered optimal for such use.



The Action Area Plan and development that will arise therefore shall comply with the following objectives:

1. Development shall be carried out in phases in the following manner

~~Phase 1—Generally to the east of the major open space shown on the concept plan above; any proposed development to the west shall only occur in tandem with significant development to the east of the OS;
 Shall include the 'village centre' and at a minimum the reservation of a site for a school campus, the scale of which reservation shall be agreed with the Department of Education and Skills
 Three more easterly blocks of 'new residential' development
 The agreement of the design of the major open space and a delivery programme for same with all relevant stakeholders~~

~~Phase 2—Generally to the west of the major open space shown on the sketch
 No residential development may commence until the delivery programme for the major open space is well underway and will be completed by the time housing units are ready for occupation~~

Phase 1	<ul style="list-style-type: none"> o Road link from N11 to Ballyman Road o Passive park (c. 8ha) o Site identified and reserve for school campus o Neighbourhood Centre o 1,500 residential units
Phase 2	<ul style="list-style-type: none"> o 50% of the active open space (c. 6ha) o 1,500 residential units

Phase 3	<ul style="list-style-type: none"> ○ Remainder of active open space (c. 6ha) ○ Identification and reservation of site for additional primary school ○ Remainder of residential units
---------	---

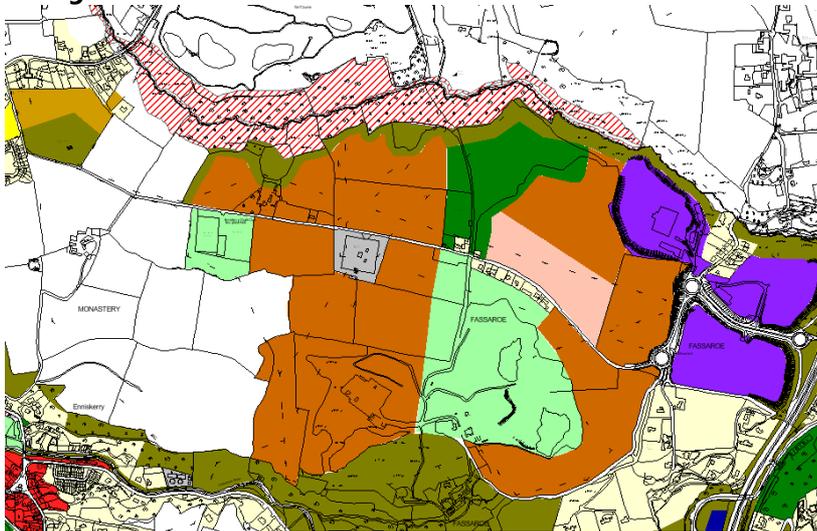
2. The development of this area shall include the provision of an access road from the N11 to Ballyman Road; the scale of such a route shall reflect its primary function as a service road for a new neighbourhood, rather than that of a 'by-pass'; the design and location of this route shall not affect the functionality of the major open space as a single park and an innovative design solution where park crossing is necessary will be required;
3. Provision shall be made for a north – south link route from the new distributor road to cross Ballyman Glen and continue in County Dublin and link up with old Conna Avenue. The nature and function of this link i.e. the type of traffic it will carry (vehicles / pedestrian / cyclist / light rail) shall be determined at application stage, following consultation with the transport agencies and the neighbouring local authority.
4. The development of this area shall make provision for LUAS or other mass transit public transport services, and any necessary infrastructure such as depots / stabling.
5. All new development shall be accompanied by appropriate transport services, the format and scale of which shall be in accordance with the Bray and Environs Local Transport Plan (to be carried out by the NTA in collaboration with Wicklow County Council and Transport Infrastructure Ireland). Developers shall be responsible for the provision and funding of the required transport services until such a time as public services are extended to the area.
6. The scale of the **village neighbourhood** centre shall be in accordance with the retail floorspace objectives of the County Retail Strategy; as well as shopping this centre shall include a range of retail and commercial services as well as community facilities, in order to create a vibrant heart of this new community; all uses shall be serviced by wide pedestrian streets and squares (to allow for outdoor uses), and while the new distributor road through the site should provide access to the village centre, neither the road nor significant car parking areas shall dominate the centre or be located directly along the frontage of buildings. **The area to be dedicated to retail, retail services, commercial / community use shall not be expected to exceed 1ha; residential development will be expected to be interspersed through this area, particularly on upper floors, of the order of 75 units. Single storey supermarkets will not be permitted; retail uses shall be integrated into a larger overall mixed use development.**
7. Lands **immediately west of the in-the** designated '**village neighbourhood** centre' shall be reserved for the future development of a multi school campus; **in** the event that further schools are required, these shall be located **to the west of the major open space at an appropriate location** on residentially zoned land.
8. The '**village neighbourhood** centre' zone and major park shall be accessible to all areas by high quality, direct and safe pedestrian and cycle routes;
9. Lands of not less than 20ha shall be laid out and dedicated to parks and active / sports uses (this corresponds to land use zones OS1 and AOS, but not OS2). Lands identified as OS2 generally comprise open, undeveloped lands encompassing flood plains, buffer zones along watercourses, rivers and Natura 2000 sites, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity. These lands are generally not considered suitable for new development, including for park use, and shall not be included in the required 20ha major open space.

10. All development proposals within the Fassaroe Action Area shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater-dependent habitats of Ballyman Glen SAC. This shall be **through the review of existing hydrogeological assessment(s) and the carrying out of new hydrogeological assessment to inform the development of ~~achieved by the use of~~ an appropriate SuDS system(s) ~~developed~~ throughout any development site and taking into account the cumulative in-combination impact of other development.**

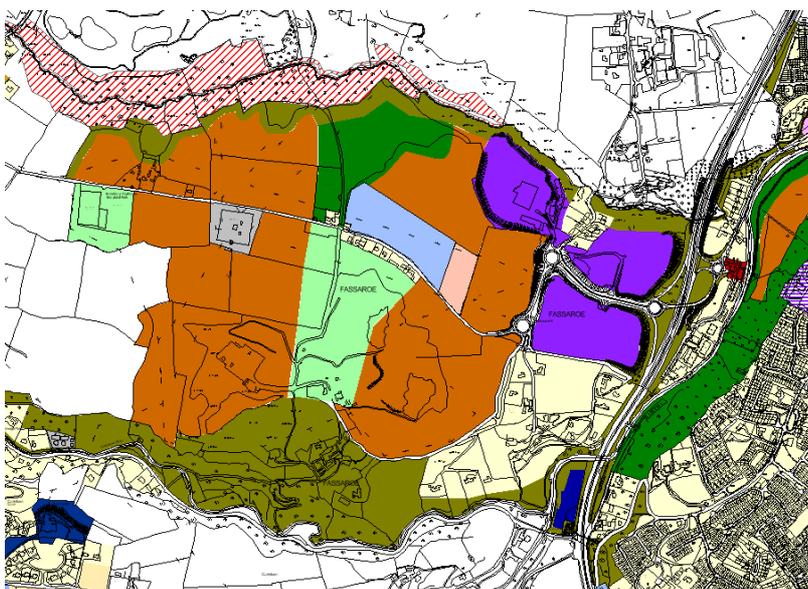
11. **Private Open Space for houses at Fassaroe shall not be subject to the standard requirements set out in the County Development Plan. However, private open space will be provided as follows:**
 - For 1 or 2 bedroom houses a minimum of 50 sqm
 - 3 bedroom houses to have a minimum of 60 sqm
 - 4 bedroom (or more) houses to have a minimum of 75 sqm.

Change zoning as follows:

Change from:

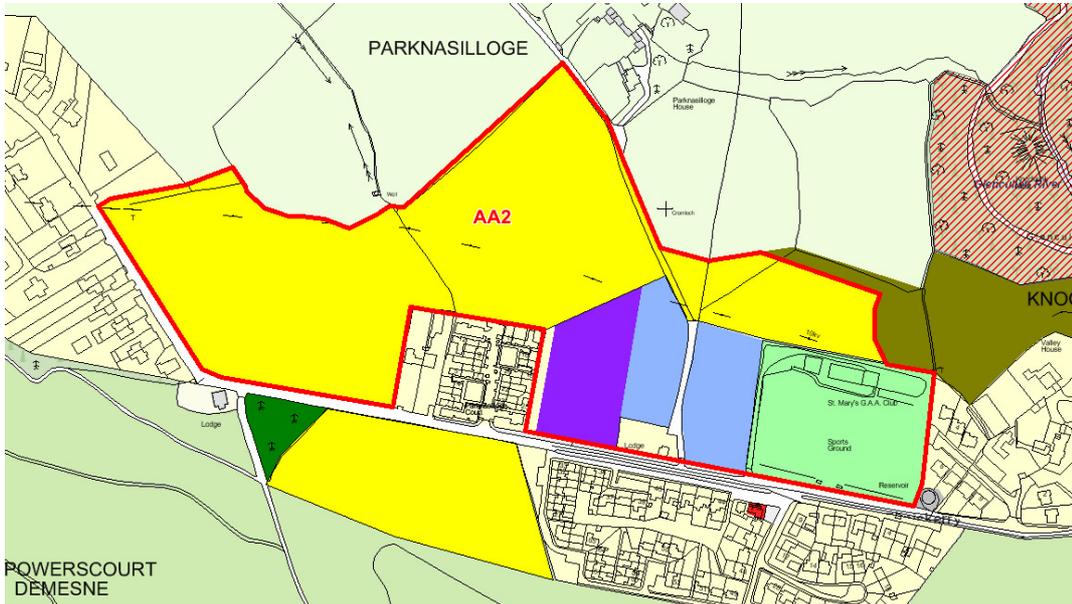


Change to:



Recommendation No. 12

Source: DCHG

Action Area 2: Parknasilloge

This action area is located west of Enniskerry town centre and immediately north of Kilgarron housing development, in the townland of Parknasilloge. This action area measures c. 13.5ha. This action area shall be developed as a residential, open space, employment and community zone in accordance with the following criteria:

- A minimum area of 2ha shall be reserved as Active Open Space (this is the size of the area currently occupied by Enniskerry GAA). In the event of the relocation of the GAA to an alternative location, this quantum of AOS shall, as a minimum, be maintained within the overall action area. Any alternative AOS shall be maintained available for general public use, shall be suitably sized to allow for organised sporting activities i.e. pitches, courts etc and shall be so located within the action area so as to be easily accessible by the wider community. (Any proposals to redevelop the existing GAA grounds will only be considered when the Planning Authority has been satisfied that suitable alternative lands have been secured for this sporting facility).
- A minimum of 1.2ha shall be reserved for education use.
- A minimum of 0.4ha shall be provided for a community uses, including a community centre of not less than 500sqm and an equipped playground of not less than 400sqm.
- A minimum of 1ha shall be provided for employment uses. Generally, this shall comprise office/studio/surgery type development of the highest architectural quality and layout. A minimum of 0.4ha of this area shall however be reserved for local service and incubator businesses.
- The car park associated with the employment area shall be so located and designed to facilitate tourist use during non-business hours and shall at all times remain available and open for this use
- A maximum of 156 residential units may be provided on the remainder of the site (8.8ha).
- The development shall be delivered in phases such that adequate education, community and employment facilities are provided for each phase; in particular, the school site shall be provided in Phase 1 accompanied by no more than 50% of the residential development and the employment facilities shall be provided no later than Phase 2 accompanied by no more than an additional 75% of the residential units.

- A maximum of two vehicular access points onto Local Primary Road L1010 (Enniskerry – Glencree) shall be permitted.
- To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceed 60 units), each containing different house designs within an overall unified theme.
- Full geotechnical and archaeological assessment of the lands shall be undertaken prior to any development taking place.
- Development proposals within the Parknasilloge Action Area shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater-dependent habitats of Knocksink Wood SAC. This shall be achieved through the review of existing hydrogeological assessment(s) and the carrying out of new hydrogeological assessment as necessary to inform the development of ~~by the use of~~ an appropriate SuDS system(s) ~~developed~~ throughout any development site and taking into account the cumulative in-combination impact of other development.

Recommendation No. 13

Amend Chapter 10 as follows:

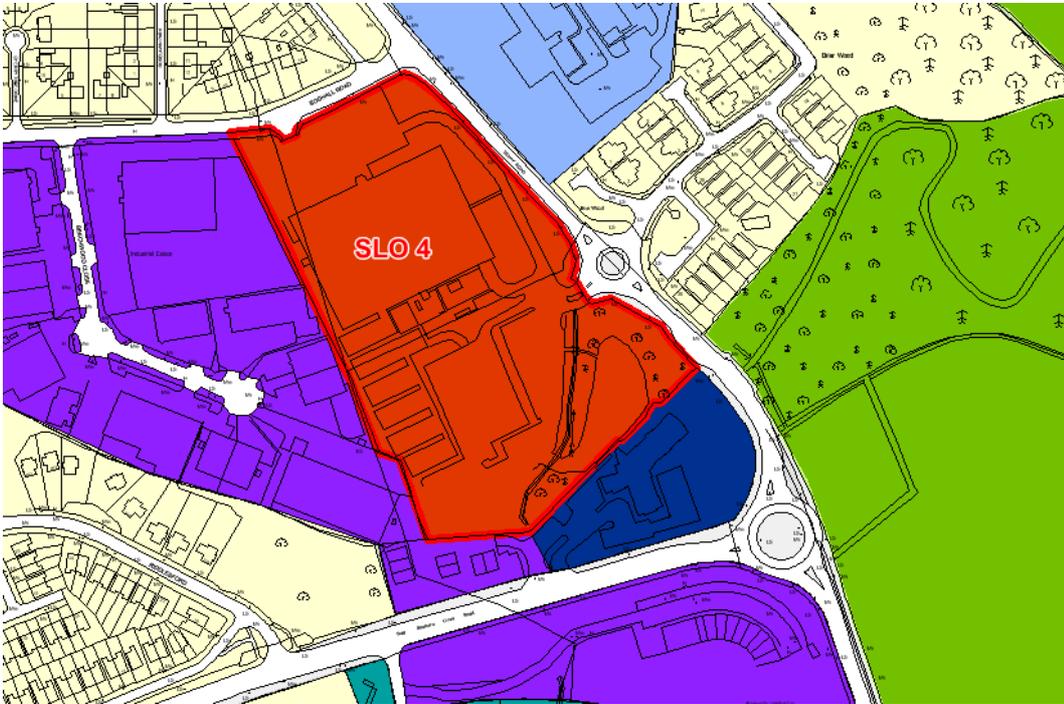
SLO 3: Former Golf Club Course

This MU zoned area measures c. 17ha. It is an objective that this land be developed as a mixed commercial, residential, education / community facilities and open space zone. While only c. 5ha has been developed to date (schools / sports zone) there is an extant permission on the remainder valid until 2020 and as substantial works have been carried out an application may be made for this permission to be extended for a further 5 years to 2025. In the event that this permission is not taken up, any new / revised proposals shall comply with the following requirements:

- The lands shall be developed as an extension to the existing town centre and shall involve the creation of a number of new streets and squares, where pedestrians and non-motorised forms of transport have priority, where buildings front directly onto streets and squares with active, attractive ground floor frontage;
- The design, finishes etc of all buildings shall draw reference and inspiration from the existing traditional town centre and the development shall flow from 'old' to 'new' without jarring distortions of scale, format or design;
- Excellent linkages shall be provided from the site to surrounding areas; multiple access points for both vehicles and cyclists / pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray seafront / the DART station and public walking route along the river;
- Car parking shall generally be located under or within buildings; not more than 20% of the total overall parking provision required for the entire MU area may be located on open surface locations
- The residential element shall generally be delivered in a high density format **with the target provision of** ~~and shall achieve the delivery of not less than~~ 1,000 units in a variety of unit sizes and formats;
- Retail development shall be integrated into the development in a manner that flows from the existing retail core of the town and brings vitality and vibrancy to the streets and squares of the new development. Retail floor space (including retail services such as restaurants, hairdressers etc) of not less than 20,000sqm (of which a minimum of 10,000sqm shall be comparison floorspace) will be required;
- Non retail commercial floor space, such as offices, professionals services etc of not less than 5,000sqm shall be integrated into the development at both ground and above retail levels;
- The existing schools / sports zone shall be retained; excellent access shall be retained to the schools and associated sports facilities and such access shall avoid the need to bring traffic through new residential areas or town shopping streets;
- Not less than 2ha shall be developed as ~~a public~~ **park open space**;
- Any application shall include a detailed phasing programme that ensures the timely delivery of all elements of the SLO. In order to 'kick start' the development, a first phase of housing, being those units that are not integrated into the mixed use retail / commercial element, in conjunction with the public park, may be developed as a 'Phase 1' of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the retail / commercial element.

Recommendation No. 14

Amend **Chapter 10**, as follows:

SLO 4: Former Dell site, Vevay Road – Boghall Road

This site was formerly occupied by computer company Dell and has been vacant for some years. The site is occupied by a large manufacturing building and surrounding grounds and car parking, measuring c. 3.75 ha. While there is a demand for additional housing in Bray, it is not considered appropriate that any and every vacant employment site should be considered for solely residential redevelopment as it is not sustainable to only deliver significant new housing at the expense of employment opportunities.

Given that this site is surrounded by both residential and employment uses, it is considered that a mixed, high intensity employment and residential scheme would be suitable on these lands, in accordance with the following criteria:

- The development shall be delivered a high density format and in particular, shall have a plot ratio of not less than 1:1. Development of up to 4 storeys may be considered;
- The employment element shall be in a ~~modern office~~ **high employment intensity** format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1 plot ratio, a total employment floor space yield of at least 20,000sqm is desired;
- **A nursing home and / or health care facility will be considered subject to such use not comprising more than 50% of the employment floorspace requirement on site and being delivered in conjunction with the remaining employment elements;**
- Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sqm)
- Any planning application shall include a detailed phasing programme that ensures the timely delivery of all elements of the SLO. In order to 'kick start' the development, a first phase of housing, comprising not more than 50% of the total housing programme, may be developed as a 'Phase 1' of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the employment element.

Recommendation No. 15 **Source: NTA**

Amend **Chapter 10, SLO-5** as follows:

It is objective of this plan that the area designated as GTH at Bray railway station shall be identified and prioritised as the principal transport hub for the County, with a range of transport services, of various modes, being available and emanating from here to all parts of the District and the wider east coast of the County, **in accordance with a strategy that shall be developed by WCC and the NTA and that shall facilitate and support the recommendation of the NTA's 'Bus Connects' programme¹⁰.**

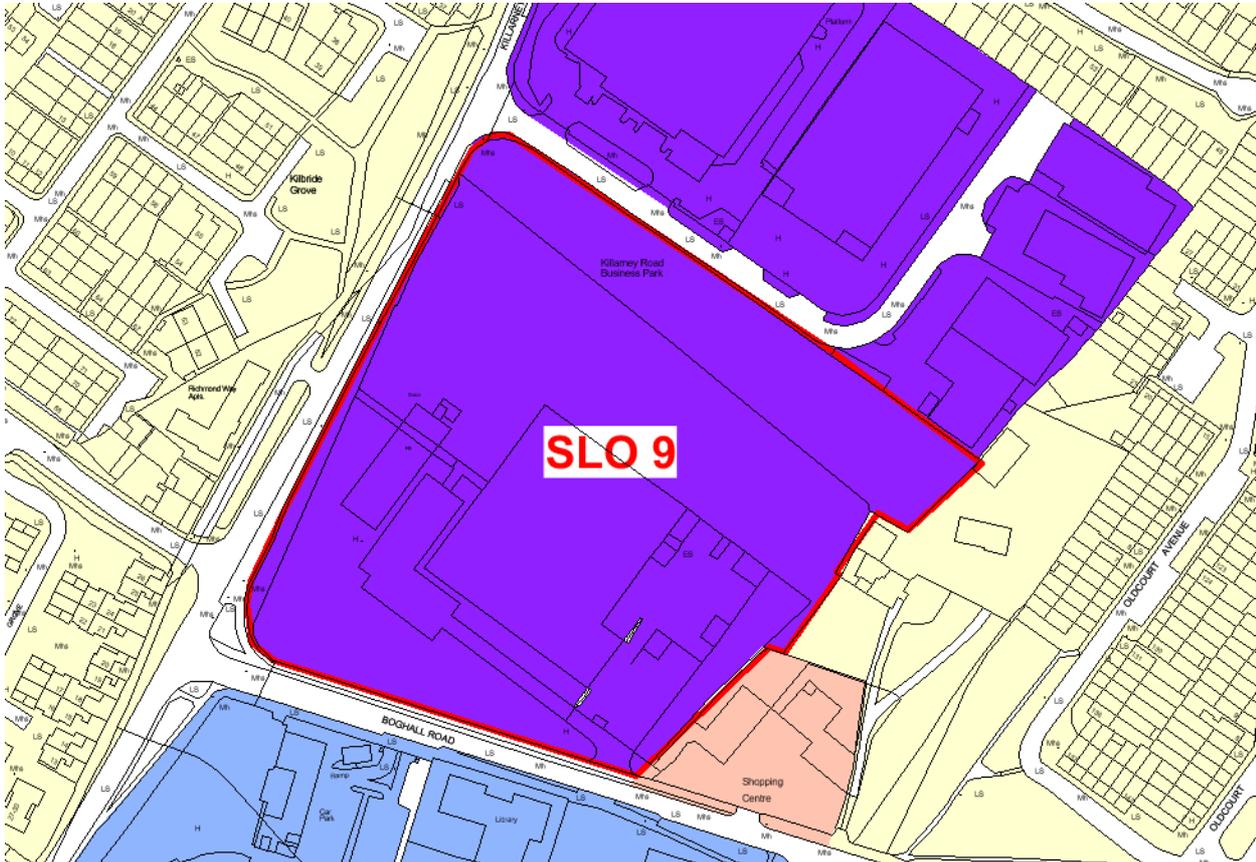
In addition, it is the objective that the area surrounding the station shall be developed as a 'gateway' to the town with clear linkages to Bray Town Centre and the Seafront. The area is considered suitable for higher density mixed use development including retail, commercial, office, residential and civic use.

The Council will favour attractive developments incorporating uses that give rise to increased footfall, including, inter alia shops, restaurants, cultural and recreation related developments.

¹⁰ BusConnects is a plan to fundamentally transform Dublin's bus system, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. It will enable more people to travel by bus than ever before, and allow bus commuting to become a viable and attractive choice for employees, students, shoppers and visitors.

Recommendation No. 16

Amend **Chapter 10**, as follows:

Add new SLO – 9 (AO Smith Site, Bray)

This SLO is located at the junction of Boghall Road and Killarney Road and is zoned for employment use (E1) use. This is considered an important development site that has lain vacant for many years and is in need of regeneration. Any development on these lands shall accord with the following objectives:

- The use of the site shall be primary for high intensity employment creating uses; low intensity employment uses such as warehousing, data centres etc shall be resisted and will only be considered where same form a minor element of an overall high density employment development;
- Any development shall be of the highest design quality and shall provide for complementary and distinctive buildings; and a high quality public realm, well connected to surrounding areas and providing for connectivity to the existing retail and housing areas in the vicinity;
- Development shall be laid out so as to provide for shared services, car parking, amenity spaces etc for the entire site; no more than 20% of the site area may be devoted to surface car parking;
- Vehicular access shall be provided through the site from Boghall Road to the Killarney Road Business Park, and the location and configuration of entrances shall be determined following detailed assessment of any potential conflicts that may arise with existing traffic flows or at junctions in the vicinity;

- Part of the site (not more than 20%) may be considered for supermarket / discount retail use, subject to satisfying all relevant retail objectives of this plan, the County Retail Strategy and the Retail Planning Guidelines;

Recommendation No. 17

Amend **Chapter 10**, as follows:

Add New SLO 10 Bray Southern Cross – Neighbourhood Centre

This SLO is located on Bray Southern Cross Road (SCR), with the 'Deerpark' road bounding the site to the west. The site is surrounded by existing housing areas to the west and north, by zoned employment land to the west and by the SCR to the south. The area measures c. 4 ha. This SLO is designated for the development of a new neighbourhood hub to serve the Bray SCR area, and provides an opportunity for both retail and community services as well as the development of new vehicular and pedestrian routes from the SCR to Boghall Road.

The development of the entire site shall be carried out as a single comprehensive development, and in particular, no residential development may occur unless it is accompanied by the 'neighbourhood centre' and open spaces and other community elements as are required by the objectives set out to follow. The development shall be of the highest design quality; the neighbourhood centre building(s) shall form a distinctive and attractive presence along the SCR; high quality urban realm and functional green spaces shall be provided, as well as pedestrian and cycling links to surrounding lands and public roads.

- The neighbourhood centre shall include a supermarket and not less than 5 smaller retail units, as well as provision for other non retail / commercial / professional up to a total floor area of 2,500sqm (GFA) for the supermarket and of the order of 500sqm (GFA) for the smaller units / non retail uses;
- The development shall include the provision of community / health / public services / wellbeing floor space of the order of 500sqm;
- Residential development, on the northern part of the site, in a higher density format of 40/ha, shall be considered only where it is part of an overall project involving the completion of the neighbourhood centre in advance of any residential units;
- Vehicular access to the site shall be from Bray SCR;
- The development shall make provision for a car free green route from the south-eastern corner of the site adjoining the SCR, through to the Deerpark road at the north western corner of the lands.

Recommendation No. 18

Source: Various

Amend Chapter 11 – Zoning and land use**CHAPTER 11 ZONING AND LAND USE**

The plan land use map indicates the boundary of the local area plan. All lands located outside of a 'settlement boundary' and marked in red are considered to be within the 'rural area'. Within these areas planning applications shall be assessed having regard to the objectives and standards for the rural area, as set out in Volume 1 of the Wicklow County Development Plan.

The purpose of land use zoning objectives is to indicate the Council's intentions for land uses in the district.

Land use zoning objectives and the associated vision for each zone are as follows:

ZONING	OBJECTIVE	DESCRIPTION
RE: Existing Residential	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
R-HD: New Residential – High Density	To protect, provide and improve residential amenities in a high density format.	To facilitate for the provision of high quality, high density new residential developments with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
R20: New residential	To protect, provide and improve residential amenities at a density up to 20 units/ha.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
R15: New residential Low Density	To protect, provide and improve residential amenities at a lower density not exceeding 15 units/ha.	To facilitate for the provision of high quality new residential environments with excellent layout and design, reflecting the low-medium density character of the surrounding area.
R10: New residential Rural Fringe	To protect, provide and improve residential amenities at a lower density not exceeding 10 units/ha.	
R Special: Special Residential	To protect, provide and improve residential amenities in a format and a density specified in the relevant plan.	To facilitate for the provision of high quality new residential environments with excellent layout and design, reflecting the density and character of the surrounding area.

ZONING	OBJECTIVE	DESCRIPTION
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation.	To develop and consolidate the existing town centres to improve vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise town centre conservation, ensure priority for public transport where applicable, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing centres' fabric.
NC: Neighbourhood Centre	To protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.	To provide for small scale mixed use commercial / community / retail developments that serve only an immediate catchment or planned new areas of significant residential expansion. Locations: Boghall Road / Ballywaltrim, Vevay, Dargle Road, Dublin Road / Little Bray, Albert Road & walk, Southern Cross Road, Fassaroe.
VC: Village Centre	To provide for the development and improvement of appropriate village centre uses in the identified area, including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation.	To develop and consolidate the village centre area in an appropriate manner and to an appropriate scale given its role as a secondary or subsidiary area to the main town centre.
LSS – Local Shops & Services	To provide for small scale local neighbourhood shops and services	To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from lands designated town centre.
E1: Employment	To provide for the development of enterprise and employment	To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment.
E3: Retail Warehousing	To provide for enterprise and employment development in the form of retail warehousing development.	To facilitate the sale of bulky goods within high quality settings and highly accessible locations, with an emphasis on exemplar sustainable design and aesthetic quality
E4: Predominantly Employment	To provide predominantly for the development of enterprise and employment	To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality

ZONING	OBJECTIVE	DESCRIPTION
		employment and enterprise developments in the main, with the option of neighbourhood services / discount foodstore, in a high quality physical environment
E-Special: Employment	To provide for the development of enterprise and employment at Kilruddery	To provide for enterprise and employment development on the grounds of Kilruddery estate that is not strictly related to the tourism product of the estate, but is compatible with the objectives of the KD zone adjacent (see Bray Specific Local Objective SLO-1 for Kilruddery)
FI: Film Industry	To provide for film/TV production related development	To provide for the development of and expansion of the existing studios at Ardmore; development of these lands shall be strictly limited to facilities for the production of film, TV, animation etc including any directly associated spin offs such as visitor facilities; however, residential development or other non film related commercial activities are not to be permitted.
CE: Community & Education	To provide for civic, community and educational facilities	To facilitate the development of necessary community, health, religious, educational, social and civic infrastructure.
AOS: Active Open Space	To protect and enhance existing and provide for new active open space	To facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.
OS1: Open Space	To protect and enhance existing and provide for recreational open space	To facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
OS2: Open Space	To protect and enhance existing open, undeveloped lands	To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.
PU: Public Utility	To maintain lands providing services infrastructure	To allow for lands to be designated for public utilities such as waste water treatment plants, large ESB sub-stations, gasworks etc
MU: Mixed Use	To provide for mixed use development	The nature of the mixed use development envisaged for any particular site is set out in the text of the plan.
SF: Bray Seafront	To provide for the development and improvement of appropriate seafront uses	To protect and enhance the character of the seafront area and to provide for mixed-use development including appropriate tourism, retail, leisure, civic and residential uses. The Seafront area shall be promoted as the primary tourist, recreational and leisure centre of Bray.
GTH: Bray Gateway & Transport Hub	To provide for the development and improvement of	To provide for the development and improvement of public transportation infrastructure. The area shall be developed as a gateway to the town with clear linkages

ZONING	OBJECTIVE	DESCRIPTION
	appropriate gateway and transport hub uses	to the Town Centre and the Seafront. The area is considered suitable for higher density mixed use development including retail, commercial, office, residential and civic use.
T: Tourism	To provide for tourism related development	To provide for the sustainable development of tourism related structures, uses and infrastructure. To provide for the development of tourism facilities including accommodation of an excellent sustainable design and aesthetic quality. Tourism related office, civic and cultural and commercial development will be facilitated.
KD: Kilruddery Demesne Conservation & Tourism Zone	To protect and enhance the distinctive historical character, setting and amenity value of Kilruddery Demesne and provide for appropriate and sympathetic conservation, amenity, tourism and community uses that enhance awareness, appreciation and accessibility of the area and to resist development that would detract from its integrity and setting.	To provide for the development and improvement of Kilruddery Demesne in a manner sensitive to its long term protection and conservation; to allow for a mix of conservation, amenity, tourism and community uses strictly on the basis that such uses can be shown to enhance the estate, its amenity value and its visitor product.
Kilmacanogue Only¹¹		
PZ	Primary Zone	To create a consolidated and vibrant mixed use settlement centre that is the focal point for the delivery of the retail, commercial, community and activity needs of the local population and its hinterland, and to promote this area for tourist uses and for residential use, with an animated and high quality streetscape, whilst ensuring the protection of the special character and heritage of this area.
SZ	Secondary Zone	To provide for the sustainable development of a mix of uses including residential, employment, community and recreational uses that provide for the needs of the existing settlement and that allows for the future growth of the settlement.
TZ	Tertiary Zone	To protect and provide for agriculture and amenity in a manner that protects the physical and visual amenity of the area and demarcates the urban and rural boundary.

The box below gives typical appropriate uses for each zone type. The planning authority shall determine each proposal on its merits, and shall only permit the development of uses that enhance, complement, are ancillary to, or neutral to the zoning objective. Uses that are materially inconsistent with and detrimental to the zoning objective shall not be permitted.

¹¹ See 'Introduction to Level 6 Settlement Plans', Volume 2 of the County Development Plan

Uses generally appropriate for **residential** zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the County Development Plan.

Uses generally appropriate for **town and village centres** include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, residential development, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the County Development Plan .

Uses generally appropriate for **neighbourhood centre** include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, residential development, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for neighbourhood centre uses in accordance with the County Development Plan.

Uses generally appropriate for **employment** zoned land include general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations and ancillary developments for employment and industry uses in accordance with the County Development Plan .

Uses generally appropriate for **retail warehousing** zoned areas includes Car Park, Cash and Carry Outlet, Garden Centre, Motor Sales Outlet, Public Services, Retail Warehouse, Wholesale Outlet and ancillary development and other appropriate employment uses in accordance with the County Development Plan.

Uses generally appropriate for **community and educational** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP.

Uses appropriate for **active open space** zoned land are sport and active recreational uses including infrastructure and buildings associated with same.

Uses appropriate for **open space (OS1)** zoned land are formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas and outdoor gyms.

Uses appropriate for **open space (OS2)** zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. As these open lands are not identified or deemed necessary for development for recreational purposes, other uses that are deemed compatible with proper planning and sustainable development may be open for consideration where they do not undermine the purpose of this zoning.

Uses generally appropriate for **public utility** zoned land are for the provision of necessary infrastructure and services such as water and waste water treatment plants, large ESB sub-stations, gasworks.

Uses generally appropriate for **tourism** zoned land are tourism accommodation and tourism / recreational uses such as Bed & Breakfast, cultural uses, holiday homes, hotels, recreational facilities.

Uses generally appropriate for the **Kilruddery Demesne Conservation and Tourism Zone** are visitor / tourism attractions, tourist accommodation, cultural / sporting / recreational uses and events, recreational and community facilities.

Uses generally appropriate for the **Film Industry Zone** are facilities for the production of film, TV, animation etc including any directly associated spin offs such as visitor facilities; however, residential development or other non film related commercial activities are not to be permitted.

Uses generally appropriate for any **mixed use** area will be specified in the plan.

Many uses exist where they do not conform to the designated zoning objective. When extensions to, or improvements of premises accommodating such uses are proposed, each shall be considered on its merits and permission may be granted where the development does not adversely affect the amenities of properties in the vicinity and does not prejudice the proper planning and development of the area.

Whilst the land-use zoning will give an indication of the acceptability or otherwise of particular uses in particular areas, proposed development will also be assessed in terms of compatibility with the development control guidelines and standards outlined in the Wicklow County Development Plan and this plan. Factors such as density, height, massing, traffic generation, public health regulations, design criteria, visual amenity, availability of services and potential nuisance by way of noise, odour and air pollution are also of importance in establishing whether or not a development proposal conforms to the proper planning and sustainable development of an area.

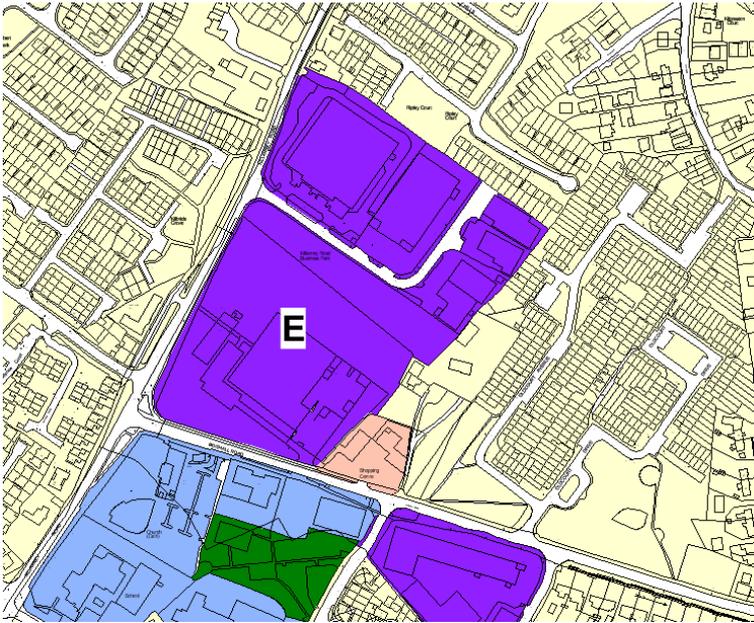
Recommendation No. 19

Various

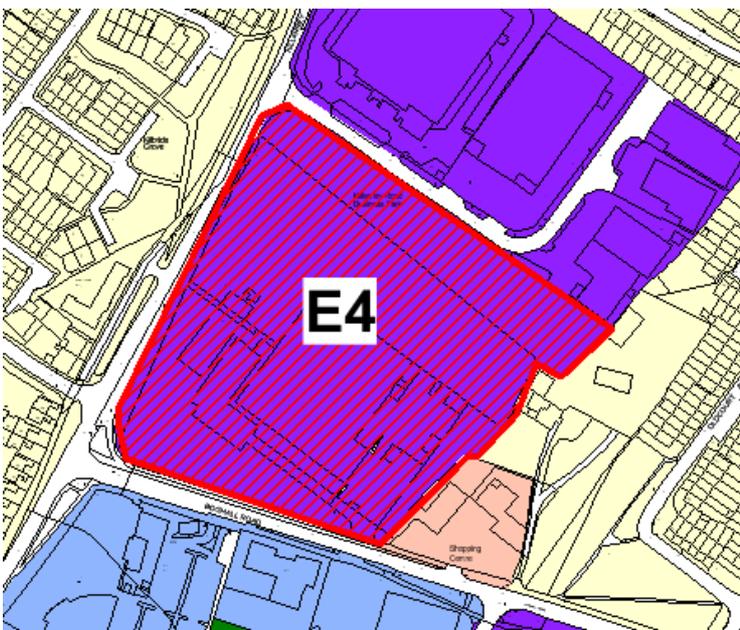
Zoning amendment – AO Smith site, Boghall Road

Map 2

Change from:



Change to:



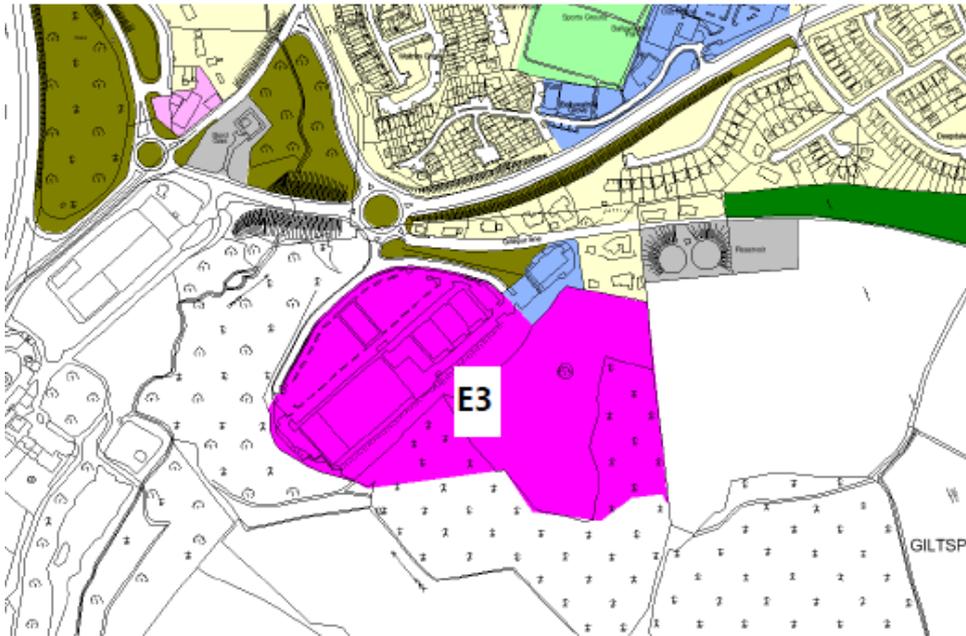
Recommendation No. 20

Source: C277

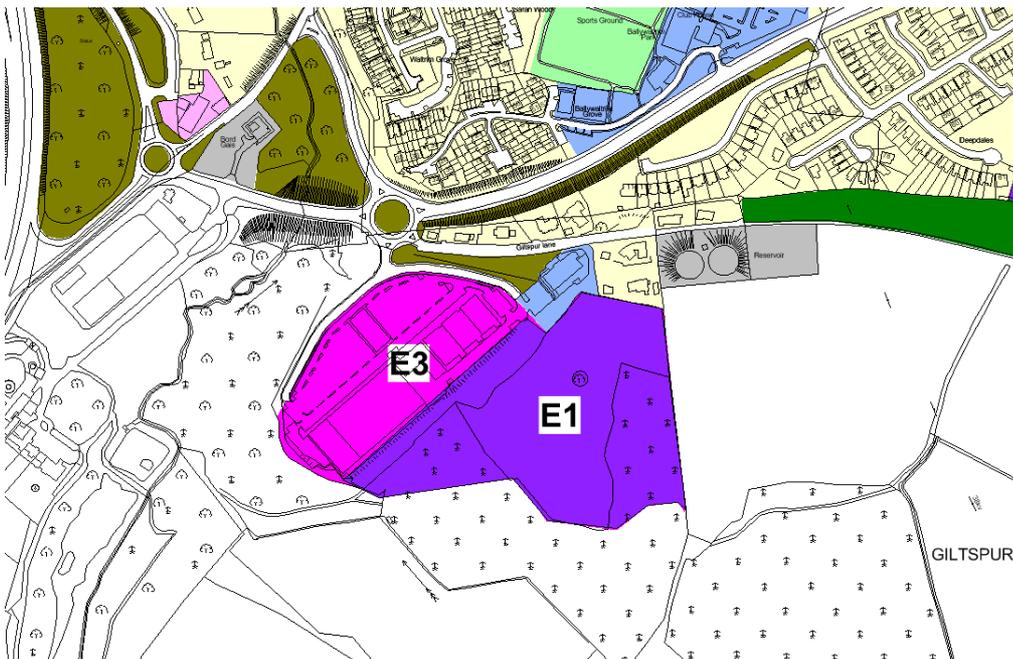
Zoning amendment – Bray Retail Park

Map 2

Change from:



Change to:



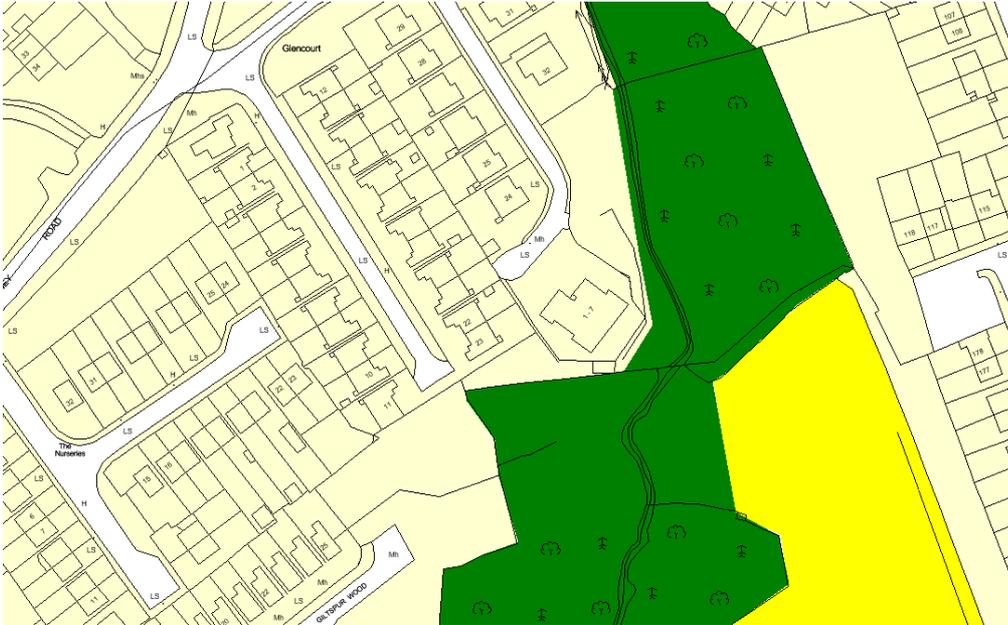
Recommendation No. 21

Source: C259

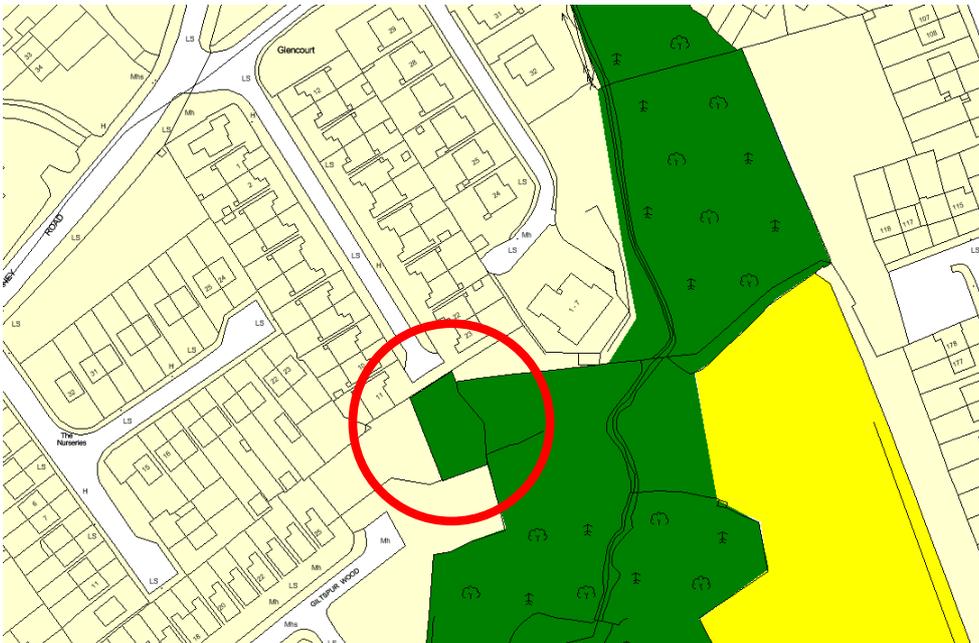
Zoning amendment

Map 2

Change from (RE):



Change to (OS1):



Recommendation No. 22

Source: Various

Map No. GI1

Omit lands which are not publically owned or open to the public from the 'open space and parks' code on the GI Map.

Recommendation No. 23

Source: Various

Add new Appendix 'Implementation'**APPENDIX D****INFRASTRUCTURE DELIVERY SCHEDULE AND IMPLEMENTATION****1. INTRODUCTION**

This appendix of the Local Area Plan deals with the infrastructure delivery schedule and sequential development phasing programme linked with necessary investment in infrastructure for the growth settlements of 'Bray and Environs' and Enniskerry¹². The sequential development of the settlements, alongside the phased delivery of the necessary infrastructure including open space, waste water, drainage, educational and recreational amenities and local service provision, is key to the sustainable development of the settlements of Bray and Enniskerry. It is critical that the Local Area Plan ensures, in so far as is feasible, that development within the Local Area Plan progresses in an ordered way which avoids 'leapfrogging' to peripheral areas that are geographically isolated from the existing settlement and infrastructural provision.

In order to ensure the successful delivery of the objectives of this plan, Wicklow County Council takes a positive proactive approach in active land management in order to expedite the delivery of new homes as part of the new residential neighbourhoods planned within the Local Area Plan. Wicklow County Council liaises with all relevant authorities in a collaborative process to resolve any potential blockages to deliver residential development in particular. Further to this any sites in 'Bray and Environs' and Enniskerry in need of development or renewal within the Bray Town Centre (TC), Bray Seafront (SF), Bray Gateway & Transport Hub (GTH), Bray Mixed Use (MU) and both Bray and Enniskerry Residential zones will be examined in order to determine if there are sites where the Vacant Site Levy should be applied.

There are a number of stakeholders involved in the delivery of all the infrastructure projects. All projects are dependent on funding. There are also numerous other matters that need to fall in line in order for each infrastructure project to be delivered, like land acquisition, securing the appropriate planning approval, etc.

2. STAKEHOLDERS

There are a number of stakeholders involved in the delivery of all the infrastructure projects. The delivery of all the strategic infrastructure, water supply, wastewater treatment, transportation and schools are managed by key state agencies.

2.1 Irish Water - Sanitary Services

The provision of an adequate supply of water and wastewater treatment facilities is critical to facilitate and sustain the growth of the plan area. The delivery, integration and implementation of water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. Wicklow County Council

¹² This appendix does not address infrastructure delivery in the smaller settlements of Kilmacanogue and Kilmurray as (a) significant growth is not targeted for these locations and (b) major new infrastructure is not required in these locations to facilitate the levels of growth targeted.

work closely with Irish Water to ensure that the County Development Plan and the LAP continue to align with both national, regional and local planning policy and that the provision of water/wastewater services will not be a limiting factor in terms of targeted growth.

Water Supply

The plan area is served by a number of public water supplies, including the Bray Direct Public Supply, which serves a population of approximately 5,000; the Bray Reservoir Public Supply, which serves a population of approximately 25,000; the Enniskerry Public Supply which serves a population of approximately 3,000 and the Kilmacanogue Public Supply which serves a population of approximately 1,000. The source of all of these water supplies is the Vartry Reservoir.

Wastewater Treatment

With regards to wastewater, the majority of the plan area (including the settlements of Bray and Kilmacanogue) is served by the Shanganagh-Bray wastewater treatment plant, which opened in January 2013. This treatment plant has a design capacity of 186,000 population equivalent, and is thus far operating with no capacity issues. Enniskerry is served by another wastewater treatment plant located at Cookstown on the Bray Road. This plant has a design capacity of 6,000 population equivalent and accepts imported sludge from other locations which absorbs much of its capacity.

2.2 Roads & Transport Infrastructure

National Transport Authority (NTA)

The NTA is the transport authority for the Greater Dublin Area (GDA) with the function of the integration of transport and land use planning in the GDA in particular, public transport and traffic management needs in the eastern region of the country. Specific functions in the GDA are (a) undertaking strategic planning of transport; (b) investing in all public transport infrastructure and (c) developing the effective management of traffic and transport demand.

The M11 / N11 motorway/dual carriageway is to the west of Bray town, to the east of Enniskerry and runs through Kilmacanogue. The DART / rail line serves Bray with the train station to the east of the Town Centre. There is a quality bus service in Bray with a limited Dublin Bus service to Enniskerry and Kilmacanogue and the 133 Bus Éireann bus serving Kilmacanogue.

Greater Dublin Transport Strategy 2016 -2035

The plan area is located within the metropolitan region of the GDA and the transport infrastructure was analysed by the NTA as part of the Greater Dublin Transport Strategy 2016 -2035.

The most dominant trip pattern within the plan area is car mode (70%) with public transport a lesser mode (11%). Outside of the M50 there are significant capacity constraints on providing for further growth on the strategic road network. On the rail network, services south of Bray operate on a single line. Congestion on the N/M11 route is increasing, particularly between the Kilmacanogue and Fassaroe junctions, and around the M50/M11 merge, during peak periods. Capacity on this route will need to be protected through appropriate demand management, in order to safeguard its strategic function. As such, the NTA's Strategy will seek to achieve an appropriate balance with the competing demands of strategic movement of high economic value and more locally based commuter traffic; North of Bray, there is considerable scope to increase line capacity on the DART. This, along with other, bus-based options will be required to accommodate the bulk of the anticipated growth in demand within the plan area; and the existing LUAS green line could deliver a limited increase in line capacity. Currently, the line is operating close to its maximum theoretical capacity during the peak demand periods.

Bray & Environs Local Transport Study

Running contemporaneously with the preparation of the Bray MD LAP, the NTA in conjunction with Wicklow County Council, Dún Laoghaire Rathdown County Council and Transport Infrastructure Ireland (TII) is undertaking a 'Transport Study' for Bray and Environs. The transport study is intended to align with the Transport Strategy for the Greater Dublin Area and identify the appropriate transport solutions for the area which will allow development to occur in line with the objectives of the Regional Planning Guidelines. It would also take full account of Transport Infrastructure Ireland M11/N11 Corridor Study.

The core objective is to undertake a transport study for the Study Area which will facilitate the land use objectives of Wicklow County Council and Dún Laoghaire-Rathdown County Council, and to provide a long-term strategic planning framework for the development of transport infrastructure and services in the Study Area.

This study assumes that the NTA Transport Strategy and the TII Corridor Study form the basis for transport investment in the Study Area up to 2035. The first objective of the study is therefore not to revisit these policy documents, but by way of carrying out further, more detailed analysis focussed on the Bray and Environs area, to determine additional measures which may be required to serve the transport demand, as well as bring greater local detail to the strategic measures set out in the Transport Strategy. The second objective of the study is to set out the transport implications, in terms of mode share, journey times etc. of the land use patterns envisaged by the two local authorities for the Study Area.

Wicklow County Council is committed to supporting and facilitating the implementation of measures identified in the study and managing / phasing development based on the delivery schedule of necessary improvements. In the event that the identification of measures occurs post adoption of the LAP (or post the stage at which changes can be made to the LAP and this appendix), Wicklow County Council is committed to updating / amending the LAP including this appendix if found necessary.

Transport Infrastructure Ireland (TII)

The TII has recently completed the M11/N11 Corridor Study – Needs Assessment Report (2017). The function of this report is to assess the future needs of the M11/N11 National Road corridor between Junction 4 (M50/M11) and Junction 14 (Coynes Cross) against a backdrop of its role as part of the Trans-European Transport Network of roads. The report also considers the needs of the regional and local road network required to support and complement the M11/N11 corridor and the safe daily operation of the M11/N11 corridor in relation to incidents. The key objectives of the study are to:

1. Identify the improvements required to:
 - Bring the section of the corridor (M11/N11 mainline and junctions) up to the appropriate standard;
 - Develop the regional and local road network to support local access and complement the corridor strategy, including the closure of all direct accesses;
 - Ensure the safe daily operation of the M11/N11 mainline and junctions in the event of the occurrence of incidents.
2. Identify a phased implementation of the improvements such that operational benefits on the corridor can be realised at an early stage without compromising the long term strategy.

Wicklow County Council is committed to supporting and facilitating the implementation of measures to improve the M/N11 and associated junctions that emerge from this study.

2.3 Department of Education and Skills – school provision

The Department of Education is the main stakeholder with responsibility for the provision of schools by modernising / extending existing schools and providing new schools. Wicklow County Council will work closely with the Department of Education and Skills (DoEd) and individual developers to secure the co-ordinated delivery of essential school provision.

2.4 Local level stakeholders

More local level infrastructure is to be provided within the key development parcels including crèche provision, neighbourhood centre facilities, pocket parks, cycle and pedestrian routes, civic spaces and public realm improvements. In most circumstances the developer of the land is a key local level stakeholder; however there are numerous local level stakeholders many of whom are state agencies.

2.5 Wicklow County Council

Wicklow County Council as the local authority responsible for the plan area has both a plan management and project delivery role in the timely and co-ordinated delivery of all strategic and local infrastructure. As the planning authority, the council is responsible for the plan management of the implementation of the objectives of the Local Area Plan and all the others sections of the council; Community, Cultural and Social Development section; Transportation, Water and Environmental Services section, Housing and Corporate Estate section and Economic Development and Enterprise section have roles in the project delivery of certain infrastructure solely or in conjunction with other bodies.

3. FUNDING SOURCES

The LAP identifies a range of strategic and local infrastructure necessary to facilitate development in the Plan Area. The delivery of all infrastructure is funding dependant. The key funding sources for the delivery of infrastructure are:

<u>Developer</u>	The developer of the land / infrastructure provides the funding to deliver the infrastructure or provides the infrastructure themselves.
<u>State</u>	LIHAF funding, Smarter Travel funding, Irish Water (IW), Transport Infrastructure Ireland (TII), National Transport Authority (NTA), OPW, Department of Education, LEADER/SICAP funding, other government departments, etc
<u>Wicklow County Council</u>	WCC Development contribution schemes, WCC Capital Works Programme, etc.

4. INFRASTRUCTURE DELIVERY SCHEDULE

This section sets out the key infrastructure necessary, in a staged delivery schedule, in order to achieve the timely delivery of the objectives of this plan. This section focuses on the key road, recreational, community and educational infrastructure. It is acknowledged that there is a broad range of infrastructure necessary in order to enhance the services to the homes, businesses and schools of 'Bray and Environs' and Enniskerry.

The development and continued delivery of telecommunications and energy has not been incorporated into this schedule as it is addressed under the County Development Plan and Wicklow County Council continues to

liaise and work with the necessary telecommunications and energy providers of such infrastructure to continue to enhance these services.

The continued development of Bray Harbour as a key recreational infrastructure asset has not been incorporated into this schedule as it is addressed under the objectives of the County Development Plan and this Local Area Plan. The management of the harbour is a function of Wicklow County Council.

The lifetime of the Local Area Plan is six years. The delivery schedule is divided in to the following four phases as well as an on-going stage with delivery throughout the plan lifetime and beyond:

<u>Immediate term</u>	Year 1 and Year 2
<u>Short term</u>	Year 3 to Year 5
<u>Medium term</u>	Year 5 to Year 10
<u>Long term</u>	10 years plus
<u>On - going</u>	Throughout the plan lifetime and beyond

This schedule is a living programme. It will be reviewed at regular intervals to assess how the implementation is progressing, available resources and as new sources of funding and/or providers emerge.

Implementation & Infrastructure Delivery Schedule Table

Infrastructure	Delivery Schedule	Funding
TRANSPORT		
Implement measures identified in 'Bray and Environs Local Transport Study'	On-going	Developer, State, WCC
Park and ride facilities	Short term	Developer, State, WCC
Improvement to bus links to Bray train station	Immediate term – Short term	State
Mass transit/LUAS to Bray town centre, bray train station and Fassaroe	Short term– Medium term	State
Improvements to mainline train and DART services	Medium term	State
Improve the capacity of the N11 / M11 - Implement the objectives of the 'Transport Infrastructure Ireland M11/N11 Corridor Study 2017'	Short term – Medium term	State
Improved and new bus services both in and out of the District and also within the District	Short term – Medium term	State
Provision of alternative road links between Bray / the N11 and Enniskerry (an access road from the N11 to Ballyman Road)	Short term – Medium term	State
North – south link route from the new distributor road to cross Ballyman Glen and continue in County Dublin and link up with old Conna Avenue	Medium term	Developer, State, WCC
General Road Improvements	On-going	Developer, State, WCC
General Footpath Improvements	On-going	Developer, State, WCC

General Cycle Improvements	On-going	Developer, State, WCC
General Car parking Improvements	On-going	Developer, State, WCC

Infrastructure	Delivery Schedule	Funding
WATER AND WASTE WATER		
General water supply network upgrade and extension.	On-going	State (IW)
General wastewater Treatment Network upgrade and extension.	On-going	State (IW)
General - Replace the combined surface water system with a separate network to the waste water.	On-going	State (IW), WCC
Dargle River Flood Defence Scheme	Immediate term	State (OPW), WCC

Infrastructure	Delivery Schedule	Funding
SOCIAL		
Active Open Space at Fassaroe	Medium term	Levies / Developer
Public Open Space / Park at Fassaroe	Short term	Levies / Developer
Active Open Space at Kilruddery	Medium term	Developer
Public Open Space / Park at Cookstown, Enniskerry	Medium term	Developer
Public Open Space / Parks at Former Golf Club lands, Bray	Short term	Developer
Crèche/ Childcare facilities	Short - Medium term	Developer
Community facilities (Audit required ¹³)	Short - Medium term	Developer
Community Centre at Parknasilloge, Enniskerry	Short – Medium term	Levies / Developer
School campus at Fassaroe	Short – Medium term	State (DoEd)
School site at Parknasilloge, Enniskerry	Short – Medium term	State (DoEd)

¹³ Where specified by the Planning Authority, new significant residential or mixed use development (This is determined to be any proposed development in: (a) settlement levels 1 to 4 of 150+ residential units, (b) settlement level 5 of 75+ residential units and (c) settlement level 6 of 30+ residential units.) proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

5. FASSAROE

The most significant development targeted for the Bray MD is the delivery of a major new housing, employment and open space zone at Fassaroe, west of the N11. Significant investment in infrastructure will be required to realise the development potential of this area, and ensure the delivery of significant new housing and transport networks for the north Wicklow area.

In accordance with the provisions of the LAP, this area shall be developed in accordance with the following key delivery and phasing criteria:

1. Development shall be carried out in phases in the following manner

Phase 1	<ul style="list-style-type: none"> ○ Road link from N11 to Ballyman Road ○ Passive park (8ha) ○ Site identified and reserved for school campus ○ Neighbourhood Centre ○ 1,500 residential units
Phase 2	<ul style="list-style-type: none"> ○ 50% of the active open space (c. 6ha) ○ 1,500 residential units
Phase 3	<ul style="list-style-type: none"> ○ Remainder of active open space (c. 6ha) ○ Identification and reservation of site for additional primary school ○ Remainder of residential units

2. The development of this area shall include the provision of an access road from the N11 to Ballyman Road; the scale of such a route shall reflect its primary function as a service road for a new neighbourhood, rather than that of a 'by-pass'; the design and location of this route shall not affect the functionality of the major open space as a single park and an innovative design solution where park crossing is necessary will be required.
3. Provision shall be made for a north – south link route from the new distributor road to cross Ballyman Glen and continue in County Dublin and link up with old Conna Avenue. The nature and function of this link i.e. the type of traffic it will carry (vehicles / pedestrian / cyclist / light rail) shall be determined at application stage, following consultation with the transport agencies and the neighbouring local authority.
4. The development of this area shall make provision for LUAS or other mass transit public transport services, and any necessary infrastructure such as depots / stabling.
5. All new development shall be accompanied by appropriate transport services, the format and scale of which shall be in accordance with the Bray and Environs Local Transport Study (to be carried out by the NTA in collaboration with Wicklow County Council and Transport Infrastructure Ireland). Developers shall be responsible for the provision and funding of the required transport services until such a time as public services are extended to the area.
6. Lands immediately west of the designated 'neighbourhood centre' shall be reserved for the future development of a multi school campus; in the event that further schools are required, these shall be located to the west of the major open space on residentially zoned land.
7. Lands of not less than 20ha shall be laid out and dedicated to parks and active / sports uses (this corresponds to land use zones OS1 and AOS, but not OS2). Lands identified as OS2 generally

comprise open, undeveloped lands encompassing flood plains, buffer zones along watercourses, rivers and Natura 2000 sites, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity. These lands are generally not considered suitable for new development, including for park use, and shall not be included in the required 20ha major open space.

6. PHASING

It is an objective of the Council that development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:

- Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided where feasible;
- A strong emphasis should be placed on encouraging infill opportunities and better use of underutilised lands;
- Areas to be developed should be contiguous to existing developed areas; and
- The development of Action Area Plans and Specific Local Objectives should be phased in accordance with the stated objectives of the Action Area / SLO where phasing has been specified.

7. IMPLEMENTATION, MONITORING & REVIEW

Wicklow County Council is committed to taking a proactive approach to progress the delivery of the Plan. The LAP will have effect for a period of six-years from the date of adoption, unless otherwise extended, amended or revoked, as per the Planning and Development Act 2000 (as amended). Prior to the fifth year from adoption, the Planning Department will carry out a review of the LAP to inform whether the Plan should be extended (for a maximum of another five years) or revoked. The findings of the review will be presented to the Elected Members for their consideration.

PART III: SUMMARY OF ISSUES RAISED AND CHIEF EXECUTIVE'S OPINION AND RECOMMENDATION ON THESE ISSUES

Section 3.1 PRESCRIBED BODIES

Submission Number	A1	Prescribed Body	Department of Housing, Planning and Local Government
Summary of Issues Raised			
<ol style="list-style-type: none"> 1. The Department considers that the Draft Bray Municipal District Local Area Plan 2017 provides for the future planned development of Bray, Enniskerry and proximate settlements in the municipal district including housing, community and economic terms. The Local Area Plan provides welcome guidance and requirements for new housing development that will support the provision of quality new neighbourhoods and coherent developments extending existing areas. However, the Council is advised of the following issues which require further examination in the Local Area Plan process. 2. Housing Development: The future housing growth proposed for the different settlements in the Bray Municipal District are detailed in section 2.2.3 of the Local Area Plan and it notes population and housing unit targets for Bray, Enniskerry, Kilmacanogue and Kilmurray to 2025. While noting that six year period of the Local Area Plan will straddle a new Wicklow County Development Plan it is considered that greater clarity is needed on the current and proposed population/housing allocation that relates to the LAP period. The housing capacity table would benefit from establishing a 2017 baseline and related targets for the plan period for Bray in particular. The table on pg.12 currently is not referenced to the Local Area Plan period and doing so would allow a greater degree of certainty over what is planned to be developed to 2023. Enhanced information has been released from the Central Statistics Office on Census 2016 to that available at the time of the preparation of the Wicklow County Development Plan and this should be incorporated into the Local Area Plan. 3. In Tables 3.1-3 the Local Area Plan has identified the specific zoned lands for development and their potential housing yield including a total of 6,130 for Bray. The Council is advised by the Department to examine these tables and clarify the sites intended to fulfil the County Development Plan housing requirement while also providing for an appropriate level of choice and variety of development sites in the zoning of lands as advocated by the <i>Development Plans Guidelines, 2007</i>. Appropriate phasing and sequential development policy mechanisms should be provided as necessary. 4. Rural Housing Policy: Since the publication of the Wicklow County Development Plan the Department has issued guidance to all local authorities under Circular letter PL 2/2017 on Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans and specifically to the application of the “local housing needs residency criteria” in section 3.2.3 of the 2005 Guidelines and your authority should ensure that the plan is consistent with the approach laid out in the circular above. 5. Flood Management: The Local Area Plan is accompanied by a Strategic Flood Risk Assessment (SFRA) which examines the extent of flood risk within the municipal district and compliance with ‘<i>The Planning System and Flood Risk Management Guidelines</i>’ (2009) issued under s.28 of the Planning & Development Act (as amended). There are a number of Flood Management Objectives contained in Section 8.2 of the Draft Local Area Plan. The Council is advised to consider the provision of additional objectives including site specific flood risk assessment for certain sites in the Local Area Plan as appropriate to ensure the SFRA is fully integrated into the Local Area Plan 			
Opinion of Chief Executive			
<ol style="list-style-type: none"> 1. Noted 2. It is not specified in what way the tables setting of population and housing targets are not sufficiently 			

clear or could be improved; further it is not possible to establish a '2017 baseline' as there is no census or other data for 2017. It is considered however that additional data from the 2016 should be integrated into the plan to bring more clarity.

3. The department appears to be suggested the zoning tables should be split into those lands that need to be developed to meet the 6 year horizon and those that are included in addition to this to provide for 'headroom' or market choice. As set out in the plan and as recommended to be amended in response to Item 2 raised, this plan does not provide for any significant 'headroom' beyond a 7 year horizon. This is for two key reasons (a) there is uncertainty about overall regional, County and settlement populations at this time, while the development of the NPF and RSES plans are in train and (b) there simply is not enough land available in the settlement of Bray to meet a longer term target. In the development of the draft plan, all possible options for new zoning were assessed and considered, and there is little scope beyond what is proposed in the draft plan.

Therefore no phasing plan is necessary, as all of the lands identified for development may be considered for development in the lifetime of the plan. Development will be however be likely to be delivered in a phased and sequential manner, with existing serviced land coming on stream first, and land requiring more significant investment in infrastructure following thereafter. In this regard, 35% of the zoned housing land in this plan is already serviced (c. 2,125 units) and these lands should therefore be considered 'Phase 1' (years 1-3) while the remaining lands are considered 'Phase 2' (Years 3-6).

4. The rural housing policies of Wicklow County Council are set out in the County Development Plan and not in local plans, as they are applicable across the all rural areas of the County. It is not possible to 'review' any 'County' policies via the LAP process. However, with regard to Circular letter PL 2/2017, this letter advised local authorities that (a) a number of processes were underway in the Department to consider the effect of a recent ECJ case in relation to freedom of movement, (b) that the 2005 guidelines would remain in effect until such a time as revised guidelines were produced and (c) local authorities should not amend their rural housing policy / local need criteria at this time.
5. The Department has requested that the Council consider the provision of additional objectives including **site specific flood risk assessment** for certain sites in the Local Area Plan as appropriate to ensure the SFRA is fully integrated into the Local Area Plan. However this is already provided for in the draft plan by the inclusion of the following objective:

FL3 *Applications for new developments or significant alterations/extension to existing developments in a flood risk area shall comply with the following:*

- *Follow the 'sequential approach' as set out in the Flood Risk Guidelines.*
- *Flood risk assessments will be required with all planning applications proposed in areas identified as having a flood risk, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site).*
- *Where a development is proposed in an area identified as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.*
- *Restrict the types of development permitted in Flood Zone A and Flood Zone B to that are 'appropriate' to each flood zone, as set out in Table 3.2 of the guidelines for Flood Risk Management (DoEHLG/OPW, 2009).*
- *Developments that are an 'inappropriate' use for a flood zone area, as set out in Table 3.2 of the guidelines, will not be permitted, except where a proposal complies with the 'Justification Test for*

- Development Management', as set out in Box 5.1 of the Guidelines.*
- *Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.*
 - *Generally a Flood Impact Assessment will be required with all significant developments and a certificate (from a competent person stating that the development will not contribute to flooding within the relevant catchment) will be required with all small developments of areas of 1 hectare or less.*

It should also be noted that a more extensive suite of flood 'objectives' are set out in the County Development Plan. As a subsidiary plan, these objectives and requirements will apply directly in the LAP area.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 1, as detailed in Part II of this report (p11)

Submission Number	A2	Prescribed Body	National Transport Authority (NTA)
Summary of Issues Raised			
<p>1. The National Transport Authority (the "NTA") welcomes the opportunity to comment on the Draft Bray Municipal District Local Area Plan (LAP). Section 19 (2A) of the Planning and Development Act (as amended) states that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy of the NTA. The Transport Strategy for the Greater Dublin Area 2016-2035 (the "Transport Strategy") was approved by the Minister for Transport, Tourism and Sport in early 2016.</p> <p>Additionally, the NTA are currently engaged with Wicklow County Council, Dún Laoghaire Rathdown County Council and Transport Infrastructure Ireland (TII) in undertaking a transport study for Bray and Environs. This study may have additional implications for transport policy and objectives in the Municipal District which will need to be taken on board as part of the LAP process.</p> <p>2. The LAP would also be significantly enhanced were it to fully incorporate the recommendations of the TII M11 / N11 Corridor Study Needs Assessment Report. With the above in mind, the NTA makes the following comments.</p> <p>(a) <u>Development Objectives</u></p> <p>The Authority supports Wicklow County Council's development objectives for the Municipal District, in particular Bray, as the growth of the town in terms of population and employment aligns with the Regional Planning Guidelines, and by extension, the Transport Strategy.</p> <p>(b) <u>Roads and Transportation</u></p> <p>The NTA recommends the following changes to the text in Section 8.1:</p> <ul style="list-style-type: none"> ▪ The third paragraph should refer to "public transport", rather than "bus transport" and the correct name of the National Transport Authority should be inserted; ▪ The name of the project currently being undertaken by the NTA should be referred to as the "Bray and Environs Local Transport Study" in this section and throughout the Local Area Plan; 			

- The fourth bullet point would more closely reflect transport policy if amended along the following lines:
 - "To facilitate the improvement of the existing road network to maximise the number of people who can move within the Municipal District and between the Municipal District and other centres of population and activity"; and
- The fifth bullet point should be amended to read as follows:
 - "To improve east-west linkages, particularly by walking, cycling and public transport".

(c) Public Transport

The NTA recommends the following changes to the text in Section 8.1.2:

- That the wording in parentheses at the end of the first paragraph be removed, as they imply that, over time, the importance of providing reliable, convenient and frequent public transport options for travel from the Bray MD to Dublin City Centre, Sandyford and the M50 ring, will lessen as employment and retail grow in Wicklow. Notwithstanding the fact that growth in Wicklow's employment base will provide options for the County's labour force to work more locally, this will not reduce the overall demand for travel from Bray into Dublin. On the contrary, on-going population growth in the County will add to the absolute level of demand, and the requirement for improved public transport links;
- Objective PT2 would be strengthened if amended to read as follows:
 - "To implement the findings of the Bray and Environs Local Transport Study, currently being undertaken by the NTA, Wicklow County Council and TII;
- Objective PT3 would align more closely with the objectives of the NTA if changes were made to reflect the following:
 - The provision of a rail-based park and ride at Woodbrook – although this is outside the Bray MD, its development will have a significant impact on public transport accessibility and on traffic movements in the plan area, and may therefore necessitate changes to the road network;
 - While the long-term aspiration to deliver Luas to Fassaroe is not opposed by the Authority, and the intention to make provision for its delivery is therefore prudent, the Local Area Plan should make it clear that the Transport Strategy does not foresee this occurring before 2035; and
- Objective PT7 should reflect the following:
 - The outcomes of the NTA's on-going *Bus Connects* programme – in the short-medium term, the NTA will be pursuing significant changes to the Dublin Metropolitan bus network and many of these changes will require the implementation of infrastructure projects in order to provide an enhanced level of reliability for bus services. This will need to be reflected in statutory plans with an objective which states that the local authority will facilitate the provision of bus priority where a requirement for such is identified by the NTA.
 - The first bullet point is noted. Such functions are within the remit of the NTA and are undertaken in cooperation with local authorities.

(d) Cycling and Walking

The NTA recommends the following changes to the text in Section 8.1.3:

- Two new bullet points should be inserted as objectives, as follows:
 - To continue to cooperate with the NTA in the implementation of the Greater Dublin Area Cycling Network Plan;
 - To ensure that cycle infrastructure provided in the Bray MD is delivered in a manner consistent with the National Cycle Manual; and
- Reference to the NTA's "Permeability Best Practice Guide" should be included in Objective CW1.

(e) Roads

Section 8.1.4 should include a reference to the Principles of Road Development as set out in section 5.8.3 of the Transport Strategy.

The NTA recommends the following changes to the text in Section 8.1.5, and associated maps:

- Objectives RO1 and RO2 should include additional details related to the TII Corridor Study where appropriate, as follows:
 - Upgrade of the M11 / N11 mainline to accommodate 3 lanes plus and auxiliary lane between J4 and Junction 5 and 3 lanes between Junction 5 and Junction 8;
 - Link road between Herbert Road and Upper Dargle Road to provide an additional crossing of the River Dargle;
 - Closure of the direct access to and from the N11 from the R117 Enniskerry Road;
 - Closure of the direct access to and from the N11 from Herbert Road;
 - Provision of a one-way northbound service road from Junction 7 to Junction 6 connecting the Enniskerry Road;
 - Improvements to Junction 6 and Junction 7, particularly for public transport, walking and cycling;
 - Provision of a one-way southbound diverge lane and service road from the N11 to Ballywaltrim Lane serving Herbert Road; and
 - Service roads in Kilmacanogue to the east and west of the N11; and
- Objective RO6 should include the NTA.

(f) Specific Local Objectives

The section related to SLO5 – Bray Gateway and Transportation Hub would benefit from some additional text setting out the role of the NTA in developing an integrated transport and land use vision for this part of the Municipal District; the objectives of the Transport Strategy in relation to Luas; and the need to facilitate the recommendations of *Bus Connects*.

Opinion of Chief Executive

1. Noted. With respect to the in-development 'Transport Study for Bray and environs', where feasible (in terms of the stages of plan making), any implications emerging from the study that may need to be taken on board in this plan, will be. However, the plan process must continue along timeframes set out in the Act and in the event that this study is not completed by the time this plan must be amended or adopted, it is likely that some recommendations may not be possible to build into the plan.

2.

- (a) Noted
- (b) With respect to Section 8.1, the suggestions are noted and it is recommended that these amendments be made.
- (c) With respect to Section 8.1.2, the suggestions are noted and some changes are recommended to Objectives PT2 and PT7 on foot of same; however with respect suggestions made regarding objective PT3, the Chief Executive is not recommending any changes for the following reasons:
 - i. It is considered unnecessary to reference the proposed new park and ride at Woodbrook specifically as the objectives of PT3 already support and facilitate the development of park and ride facilities as appropriate location to be identified through transport studies;
 - ii. It is not considered necessary to emphasise that the NTA considers it unlikely that the LUAS will be delivered before 2035; the plan objectives simply require that provision is made (for example through serving transport corridors free of development) for the LUAS if and when it is delivered to Bray. However, the 'phasing and implementation' plan for the plan and Fassaroe in particular will set out the short, medium and long term infrastructure required, and the LUAS is shown as a 'long term' objective.
- (d) With respect to Section 8.1.3, the suggestions are noted and it is recommended that amendments be made.
- (e) With respect to Sections 8.1.4 and 8.1.5, the suggestions for section 8.1.14 are noted and it is recommended that some amendments be made; however, it is not considered necessary or prudent to amend Section 8.1.5 include detailed objectives for recommendations that are only at the feasibility stage, as to do so could preclude alternative solutions at later stages of the design process which could in effect be a material contravention of the plan.
- (f) With respect to SLO 5 the suggestions are noted and it is recommended that amendments be made.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 5, as detailed in Part II of this report (p23)

Amendment No. 6, as detailed in Part II of this report (p24)

Amendment No. 7, as detailed in Part II of this report (p25)

Amendment No. 8, as detailed in Part II of this report (p26)

Amendment No. 14, as detailed in Part II of this report (p37)

Submission Number	A3	Prescribed Body	Dept of Culture, Heritage & the Gaeltacht
Summary of Issues Raised			
<p>1. Architectural Heritage</p> <p>The Architectural Heritage Advisory Unit of this Department recommends the following:</p> <p>Section 9.1, page 50: Last sentence should be amended to read... 'Works to a protected structure should comply with the statutory guidelines, Architectural Heritage Protection Guidelines for Planning Authorities (2004, 2011)'.</p> <p>AH5, page 52: amend to read... 'To maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on their setting and character'.</p> <p>2. Nature Conservation</p> <p>The nature conservation comments are listed below and it is recommended that the draft documents are amended to take account of these comments.</p> <p>Clarification is also needed as to how the draft LAP will impact on Knocksink Wood SAC and Nature Reserve, on lands owned and managed by this Department, in particular as a result of proposed greenways and areas for recreation linked by green corridors such as proposed by objectives RO9 and GI5. The Department may also have health and safety concerns e.g. in particular, where cyclists are not separated from pedestrians; any such developments would require prior agreement of the Department as a landowner.</p> <p>3. Plan</p> <p>This Department welcomes the biodiversity objectives but notes that there are some objectives that have the potential to impact adversely on the natural heritage including impacting adversely on Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) such as Knocksink Wood SAC, Ballyman Glen SAC and the Wicklow Mountains SAC and Wicklow Mountains Special Protection Areas (SPA) designated under the EC Birds Directive (Directive 2009/147 EC). Such objectives include roads objectives, objectives relating to greenways, and objectives relating to the use of natural resources for amenity purposes.</p> <p>Examples of such objectives include:</p> <ul style="list-style-type: none"> • Objective RO4 for a road to cross Ballyman Glen • Objective RO9 for greenways including along a number of rivers such as the Glencullen (Cookstown) River, the Dargle River and the Kilmacanogue River • Objective RN3 involving new access in mountain areas <p>Objectives relating to greenways, and to the use of natural resources for amenity purposes, can have an adverse impact on biodiversity. In general, greenway routes and the use of natural resources for amenity purposes will need ecological assessment in their planning and design in order to ensure their development is consistent with nature conservation objectives and legal compliance requirements. They should not target sensitive ecological sites or parts of sites, as such routes have potential for disturbance to habitats and species, including as a result of noise and lighting for example. Where such sites do not have a nature conservation designation they may act as areas listed under Article 10 of the Habitats Directive to improve the ecological coherence of the Natura 2000 network.</p> <p>The draft LAP appears to target waterways such as rivers and streams as proposed sites for greenways. Such sites act as ecological corridors under article 10 of the Habitats Directive. Any such proposed development must be done in such a way as not to diminish their capability to act as an ecological corridor or diminish their biodiversity. In particular such areas should not be lit at night as lighting is likely to cause some bat species, particularly Daubenton's bats, to avoid the area for feeding, thus impacting unfavourably on their range and</p>			

distribution.

The key development areas of Fassaroe and Enniskerry have the potential to impact on Knocksink Wood SAC and Ballyman Glen SAC. This is recognised in chapter 10 by a series of objectives in the Action Areas of Fassaroe and Parknasilloge which relate to the groundwater dependant habitats in these SACs, in particular the priority annex I habitat of petrifying springs with tufa formation (code 7220).

The Local Authority should note that in addition to being designated as an SAC, that the Glen of the Downs is also a Nature Reserve. Therefore the Glen of the Downs Nature Reserve should be added to Schedule 10.07.

4. NIR

- (a) In light of the potential for a significant effect a Nature Impact Report has been prepared. The main concern of this Department is any effects on the groundwater which in turn could lead to significant effects on Ballyman Glen SAC and Knocksink Wood SAC, and particularly on the priority habitats of petrifying springs with tufa formation.

A series of objectives in the Action Areas of Fassaroe and Parknasilloge have been included in chapter 10 of the draft LAP which relate to the groundwater dependant habitats in the Knocksink Wood and Ballyman Glen SACs. This is discussed in section 5.2.10 of the NIR. The wording used implies that the requirement to maintain the rate, quality and general areas where groundwater recharge occurs can be achieved by the use of an appropriate SuDS system taking account of cumulative and in-combination impacts. It seems likely to this Department that a hydrogeological survey would be necessary to adequately inform any development that could impact on the groundwater dependant habitats of the two SACs, and it is not clear if such a survey has already taken place or not. Ideally such a survey would have informed the LAP. This issue needs to be addressed and it needs to be made clear what survey work could be involved in ensuring the protection of the groundwater habitats in order not to raise expectations for development which may not be able to proceed at project stage. For example it is possible that building foundations would need to be kept above a certain depth, and some areas may need to remain undeveloped, so as not to interfere with the priority habitat of petrifying springs with tufa formation.

- (b) This Department notes the statement in section 5.1.1 that *"Whilst it was not possible to rule out adverse effects on integrity of European Sites for some objectives, it is considered reasonable that AA would be applied at the lower levels of planning to ensure that proposals are designed and appropriately assessed to consider the potential for such effects."* It is also stated in section 5.1.1 that the specific objectives that could cause adverse impacts on site integrity are CD6, GI5, RO9, RO7, RO4 and RO3 but that the County development Plan objective NH2 and objective B2 in this draft LAP will provide protection for any proposals that may adversely impact the integrity of a Natura 2000 site. As stated above, ideally a hydrogeological survey should have informed the LAP so that such issues would not be pushed down to project level. There needs to be more discussion of the issues and survey work that would be involved at project stage where groundwater dependant habitats are an issue. In addition, when one examines the assessment of objectives in appendix B it can be seen that there are more objectives that should be included such as RN1 and RN3 for example.

- (c) With regard to in-combination effects with other plans and projects it is noted that table 2 in section 3.3 does not list any projects.

5. SEA

- (a) The Environmental Objective (EO) for biodiversity in section 6.2 covers limiting adverse impacts on habitats and species of conservation concern. However an SEA should address biodiversity in general and not just the habitats and species that are of conservation concern.
- (b) Similarly, the Environmental Targets in section 6.3 do not appear to have any targets for protected species outside of designated sites. Examples include flora and fauna protected under the Wildlife Acts 1976-2012 and species listed for strict protection by being listed on annex IV of the Habitats

Directive such as bats and otters. Protected species are however mentioned in the draft SEA indicators in table 17 in section 6.4 where population and range of protected species is an indicator.

- (c) It is stated in the NIR that the specific objectives that could cause adverse impacts on site integrity are CD6, GI5, RO9, RO7, RO4 and RO3. This is not reflected in the SEA assessment in table 19 in section 7.3. For example RO9 is given a neutral rating and the issue of the impact on the biodiversity in the river corridors has not been assessed. The assessment of RO4 does not mention the SAC in Ballyman Glen despite giving a negative assessment for biodiversity. The assessment of GI5 is rated positive for biodiversity yet as per the NIR it has the potential to adversely impact on Natura 2000 site integrity. There needs to be consistency between the NIR and SEA.
- (d) The description of Kilmacanogue Marsh pNHA on page 21 appears to be an error as it refers to a site in Co. Wexford.

Opinion of Chief Executive

1. These are minor wording changes, and it is recommended to amend the text as suggested.
2. With respect to the concerns regarding impacts on Knocksink Wood SAC and Nature Reserve, no development is targeted for this area and it is considered that any objectives of the plan, such as those relating to green routes, are not likely to result in significant adverse impacts on this SAC, given the controls and management structures that are already in place for these lands and the mitigation measures built into both this LAP and the County Development Plan. With respect to Objectives RO9 and G15, the draft plan states it is an objective to '*promote and support*' the development of greenways but this will be clearly dependent on any such route meeting all planning and environmental requirements, including Appropriate Assessment.
3. It is accepted that 'developments' (rather than 'objectives') relating to roads, greenways, and to the use of natural resources for amenity purposes, along with many other forms of development, can potentially have an adverse impact on natural heritage and biodiversity. It is for this reason that this plan, in conjunction with the County Development Plan, includes a significant number of 'mitigation' objectives that apply to all developments to ensure that adverse impacts do not arise, e.g.

Draft Bray MD LAP

- B1** To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.
- B2** No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this plan (either individually or in combination with other plans or projects¹⁴).
- B3** To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites¹⁵ in Wicklow.

¹⁴ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

¹⁵ Along with cSACs, SPAs and pNHA these include Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).

B4 To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network.

RN1 To facilitate the use of natural areas for active outdoor pursuits, subject to the highest standards of habitat protection and management and all other normal planning controls.

Wicklow County Development Plan

NH1 To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.

NH2 No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this plan (either individually or in combination with other plans or projects¹⁶).

NH3 To contribute, as appropriate, towards the protection of designated ecological sites including candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs). To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following and any updated/superseding documents:

- EU Directives, including the Habitats Directive (92/43/EEC, as amended)¹⁷, the Birds Directive (2009/147/EC)¹⁸, the Environmental Liability Directive (2004/35/EC)¹⁹, the Environmental Impact Assessment Directive (85/337/EEC, as amended), the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC).
- National legislation, including the Wildlife Act 1976²⁰, the European Communities (Environmental Impact Assessment) Regulations 1989 (SI No. 349 of 1989) (as amended), the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) and the European Communities (Environmental Liability) Regulations 2008²¹.
- National policy guidelines (including any clarifying Circulars or superseding versions of same), including the Landscape and Landscape Assessment Draft Guidelines 2000, the Environmental

¹⁶ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

¹⁷ Including Annex I habitats, Annex II species and their habitats and Annex IV species and their breeding sites and resting places (wherever they occur).

¹⁸ Including Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur).

¹⁹ Including protected species and natural habitats.

²⁰ Including species of flora and fauna and their key habitats.

²¹ Including protected species and natural habitats.

Impact Assessment Sub-Threshold Development Guidelines 2003, Strategic Environmental Assessment Guidelines 2004 and the Appropriate Assessment Guidance 2010.

- Catchment and water resource management Plans, including Eastern and South Eastern River Basin Management Plan 2009-2015 (including any superseding versions of same).
- Biodiversity Plans and guidelines, including Actions for Biodiversity 2011-2016: Ireland's 2nd National Biodiversity Plan (including any superseding version of same).
- Ireland's Environment 2014 (EPA, 2014, including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.

NH4 All projects and plans arising from this plan²² (including any associated improvement works or associated infrastructure) will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:

- 1) The Plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or
- 2) The Plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type and / or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or
- 3) The Plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.

NH5 To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites²³ in Wicklow.

NH6 Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

NH7 The Council recognises the natural heritage and amenity value of the Wicklow Mountains National Park and shall consult at all times with National Park management regarding any developments likely

²² Such projects include but are not limited to those relating to: agriculture; amenity and recreation; contaminated sites; electricity transmission; flood alleviation and prevention; forestry; mineral extraction; renewable energy projects; roads; telecommunications; tourism; wastewater and discharges; and water supply and abstraction.

²³ Along with cSACs, SPAs and pNHA these include Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).

to impact upon the conservation value of the park, or on issues regarding visitor areas.

- NH8** To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.
- NH9** To support, as appropriate, relevant public bodies (such as the National Parks and Wildlife Service), efforts to seek to control and manage alien / invasive species within the County.
- NH10** To facilitate, in co-operation with the relevant statutory authorities and other groups, the identification of valuable or vulnerable habitats of local or regional importance, not otherwise protected by legislation.
- NH11** To support the Department of the Arts, Heritage, Regional, Rural and Gaeltacht Affairs and the National Parks and Wildlife Service in the development of site specific conservation objectives (SSCOs).
- NH12** To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network in Wicklow.

In order to assist the reader in understanding this area, it is recommended that an additional paragraph as follows be inserted in Section 9.3 under the heading 'Green Infrastructure Objectives':

'The exact route for these developments is not yet known so detailed ecological assessment for impacts on important ecological features, including general ecological impact assessment and specifically Appropriate Assessment, is best carried out when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases'.

Additional text will also be included within the NIR assessment of these relevant objectives highlighting that County Development Plan objective NH2 and objective B2 of the Bray Municipal District LAP and the inclusion of explanatory text highlighting some of the potential issues will mitigate against adverse impacts on integrity of Knocksink Wood SAC, Ballyman Glen SAC and the Wicklow Mountains SAC and Wicklow Mountains Special Protection Areas (SPA).

4. NIR

(a)

Hydrogeological Assessment for Knocksink Woods

A hydrogeological assessment was carried in 2016 to assess the inner zone of the catchment (zone of contribution) which delineates the recharge area required to provide the quantity of flow at springs in

Knocksink Woods SAC. The mapping of this zone of contribution of the Tufa Springs and the calculation of recharge area has informed the extent of Open Space 2²⁴ and the zoning for Action Area 2 Parknasilloge as this Action Area lies within the recharge area. The work to inform this hydrogeological assessment was based on standard methodology as outlined in Geological Survey of Ireland Groundwater Protection Guidelines and included an assessment of existing ground investigation data, two site walk overs to identify hydrogeological features, an assessment of datasets including topography, subsoils, soils, bedrock and water courses.

Hydrogeological Assessment for Ballyman Glen

An assessment of the historic landfills within lands at Action Area 1 - Fassaroe was made during 2016 to inform planning application. This assessment included trial pits, monitoring boreholes (gas, leachate and groundwater) and geophysical survey and informed the production of a NIS accompanying the proposed development (currently under appeal to ABP). A groundwater catchment area was delineated within the NIS for Phase 1 of the Action Area 1: Fassaroe and it is considered that this entire groundwater catchment area is likely to encompass all areas within Action Area 1 that drain to tufa springs and fen within Ballyman Glen. However, an assessment based on observations at springs within Ballyman Glen during summer to estimate spring flow, as per the study at Knocksink, has not been carried out, and therefore the area required to supply the flow to the spring using standard recharge rates for effective rainfall is not known. It is considered that an assessment of this area would be required for any proposed development.

To address concerns raised by the Department it is considered that further detail be provided within both the main body text of the LAP and subject to AA Screening, specifically:

For **Action Area 1: Fassaroe, Objective 10:**

10. All development proposals within the Fassaroe Action Area shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater-dependent habitats of Ballyman Glen SAC. This shall be **through the review of existing hydrogeological assessment(s) and the carrying out of new hydrogeological assessment to inform the development of** ~~achieved by the use of~~ an appropriate SuDS system(s) ~~developed~~ throughout any development site and taking into account the cumulative in-combination impact of other development.

For **Action Area 2: Parknasilloge**, last criteria bullet point.

Development proposals within the Parknasilloge Action Area shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater-dependent habitats of Knocksink Wood SAC. This shall be achieved **through the review of existing hydrogeological assessment(s) and the carrying out of new hydrogeological assessment as necessary to inform the development of** ~~by the use of~~ an appropriate SuDS system(s) ~~developed~~ throughout any development site and taking into account the cumulative in-combination impact of other development.

- (b) In order to include as wide as possible of an interpretation of any objective which might have the potential to impact on Natura 2000 sites it is recommended to include objectives E2, E4, E5, E6, E7, E9, EE1, CD6, RN1 and RN3 within NIR list of objectives which could cause adverse effects on site integrity

²⁴ Uses appropriate for open space (OS2) zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. As these open lands are not identified or deemed necessary for development for recreational purposes, other uses that are deemed compatible with proper planning and sustainable development may be open for consideration where they do not undermine the purpose of this zoning.

but that the County Development Plan objective NH2 and objective B2 of the Bray Municipal District LAP will mitigate against.

- (c) As the purpose of the Draft Bray Municipal District Local Area Plan 2017 is to put in place a land use framework that will guide the future sustainable development of the Bray Municipal District it is considered most appropriate to assess in-combination effects in the context of other national, regional and local development and sectoral plans.
5. (a) This objective seeks to protect and conserve biodiversity in general but specifically seeks to limit adverse impacts on habitats and species of conservation concern (i.e. those identified in the legislation and those of value and at threat from development). The term 'of conservation concern' is recommended to be removed from this sentence to provide for general biodiversity protection.
- (b) Biodiversity target 2 specifies '*Improve/conserves and protect all designated sites and species within and adjacent to the plan area*'. This target therefore applies to any flora and fauna species (protected under relevant biodiversity legislation, including the Wildlife Acts 1976-2012 and Annex IV of the Habitats Directive) within or adjacent to any portion of the plan area (whether that area is designated or not). It is recommended that this target be amended to '*Improve/conserves and protect all designated sites and **designated** species within and adjacent to the plan area*'.
- (c) It is stated (in Sections 7.1 and 8.1) and assumed that all new developments would be subject to provisions of the NSS, CDP and obligated to comply with legislative requirements for EIA and AA if necessary. This implies that any developments (such as those identified in the objectives above) would be assessed and adverse impacts mitigated in accordance with relevant legislation, policy and guidance at a project-specific level as part of their planning application where appropriate.
- (d) Noted, will be rectified.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 9, as detailed in Part II of this report (p27)

Amendment No. 10, as detailed in Part II of this report (p28)

Amendment No. 11, as detailed in Part II of this report (p30)

Amend NIR and Strategic Environmental Assessment as necessary

Submission Number	A4	Name	Department of Education and Skills																															
Summary of Issues Raised																																		
<p>1. It is noted that the draft plan Written Statement, Section 2.2.3 'Population and Housing' states that the population and housing unit targets for 2025 are being utilised in this plan.</p> <p>Using the projected population targets for 2025 published in the Written Statement in section 2.2.3 Population and Housing and applying the information used to calculate educational infrastructure requirements as set out in Appendix 1, the last 2 columns of the table below outlines the number of primary classrooms and the number of post primary school places which would be required to meet the projected increase in population in the relevant towns, if this level of population growth was to materialise.</p> <table border="1"> <thead> <tr> <th>Strategic Planning Area</th> <th>2011 Population</th> <th>2025 Population</th> <th>Growth</th> <th>National Primary School Going Average 12%</th> <th>Potential Primary Classroom Requirement Based on PTR 27:1</th> <th>National Post-Primary School going Average (8.5%) Deficit of Places</th> </tr> </thead> <tbody> <tr> <td>Bray</td> <td>29,339</td> <td>38,119</td> <td>8,780</td> <td>1,054</td> <td>39</td> <td>746</td> </tr> <tr> <td>Enniskerry</td> <td>1,940</td> <td>2,401</td> <td>461</td> <td>55</td> <td>2</td> <td>39</td> </tr> <tr> <td>Kilmacanogue</td> <td>799</td> <td>923</td> <td>124</td> <td>15</td> <td>1</td> <td>11</td> </tr> </tbody> </table>							Strategic Planning Area	2011 Population	2025 Population	Growth	National Primary School Going Average 12%	Potential Primary Classroom Requirement Based on PTR 27:1	National Post-Primary School going Average (8.5%) Deficit of Places	Bray	29,339	38,119	8,780	1,054	39	746	Enniskerry	1,940	2,401	461	55	2	39	Kilmacanogue	799	923	124	15	1	11
Strategic Planning Area	2011 Population	2025 Population	Growth	National Primary School Going Average 12%	Potential Primary Classroom Requirement Based on PTR 27:1	National Post-Primary School going Average (8.5%) Deficit of Places																												
Bray	29,339	38,119	8,780	1,054	39	746																												
Enniskerry	1,940	2,401	461	55	2	39																												
Kilmacanogue	799	923	124	15	1	11																												
<p>2. In relation to the Enniskerry and Kilmacanogue areas the Department would expect that the existing schools should be capable of catering for the increase in pupil numbers.</p>																																		
<p>3. In relation to the Bray area, the growth of 8,780 would result in the need for an additional 39 classrooms at primary level and 746 school places at post-primary level. If none of these projected numbers were to be catered for in existing schools, this population growth would equate to the need for two new 16-classroom expandable to 24-classroom primary schools with special needs units. The post-primary numbers equate to one 1,000 pupil post-primary school with special needs unit. In terms of site size, a new primary school ranging in size from 16-24 classrooms, as a guide, requires 1.6 hectares (4 acres). A new post-primary school catering for 1,000 students would require <i>circa</i>. 4.57 hectares (12 acres approximately).</p> <p>In our submission to the preparation for the plan dated 11 November 2016 the Department outlined the educational infrastructure requirements based on projected population targets provided out to 2028; namely the requirement for two 16-24 classroom primary schools and one 1,000 pupil post-primary school. There was also the suggestion that it may be prudent to consider a campus arrangement for these schools and if so a site of approx. 20 acres would be required.</p> <p>As the educational infrastructure requirements remain the same regardless of whether they are calculated on the 2025 or 2028 projected growth i.e. the need for two new 16-classroom expandable to 24-classroom primary schools with special needs units and one 1,000 pupil post-primary school with special needs unit, the Department of Education and Skills has nothing further to add in that regard.</p>																																		
<p>4. It is noted that the draft plan Written Statement outlines in Action Area 1: Fassaroe page 56 Phase 1 that "Shall include the 'village centre' and at a minimum the reservation of a site for a school campus, the scale of which reservation shall be agreed with the Department of Education and Skills". If the site reservation referred to is intended to cater for the educational infrastructure requirements arising from the projected growth outlined above, please note that as referenced above, the Department's submission to the preparation for the plan dated 11 November 2016 indicated that the campus</p>																																		

arrangement referred to would require a site of approx. 20 acres.

Opinion of Chief Executive

1. Noted
2. Noted
3. The additional classroom / school capacity calculated for the 2025 target year is noted. It is recommended that additional text is added to the plan to outline the educational needs in the plan area.
4. It is intended that all new schools provision in the Bray area shall be located in Fassaroe, the key area of major housing / population expansion and the only location where an adequate land bank would be available for new school construction. In this regard, it is requirement for the development of Fassaroe that a central school campus comprising a secondary school and one 16-24 classroom primary school would be located, alongside a new 'town centre'. The area of land indicated for this mixed use is just over 6ha on the basis of:
 - A secondary school requires 4.57ha approx
 - A 16-24 classroom primary school requires 1.6 acres
 - In combination, this would require 6.17ha; however, on the basis that this is a 'campus' where facilities (such as playing pitches) can be shared, it was considered that c. 5-55.5ha would be adequate, with the remaining lands to be devoted to a 'neighbourhood centre' uses. In this regard, regard was taken of the size of the under construction new primary and secondary campus at Ravenswell / old Bray golf course, which is 5ha.
 - Furthermore, it was considered that the location of said block adjoining a major area of designated open space may allow for the development of school and community shared pitches outside of the 'CE' zone itself.

The objectives for the Fassaroe development area also state that where a need for additional school building is required (such as the second 16-24 classroom primary identified in this submission), this should be located to the west of the major open space on residentially zone lands. In this regard, it may be prudent to actually zone a site of 1.6 ha in this area so that the lands can be reserved.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No. 4, as detailed in Part II of this report (p19)
2. Amendment No. 11, as detailed in Part II of this report (p30)

Submission Number	A5	Name	Health & Safety Authority
Summary of Issues Raised			
The HSA simply notes receipt of draft plan			
Opinion of Chief Executive			
n/a			
Chief Executive's Recommendation			
No change			

Submission Number	A6	Name	Meath County Council
Summary of Issues Raised			
MCC simply notes receipt of draft plan			
Opinion of Chief Executive			
n/a			
Chief Executive's Recommendation			
No change			

Submission Number	A7	Prescribed Body	Transport Infrastructure Ireland (TII)
Summary of Issues Raised			
<p>1. Strategic National Road Network</p> <p>The public consultation document prepared by the Council in advance of the preparation of the Bray Municipal District Draft Local Area Plan, 2017, stated that <i>'undoubtedly one of the major issues affecting the sustainability of the area relates to congestion problems facing commuters accessing the M11/N11 for trips into and out of Dublin; and congestion problems facing local residents taking local trips into and out of Bray/ within Bray, for school and employment'</i>.</p> <p>Currently, and as Wicklow County Council is aware, the M11/N11 corridor is operating in excess of capacity in the northbound direction during the AM peak and in excess of capacity in the southbound direction during the PM peak. In addition, there have been limited corresponding improvements in the local road network, public transport and/or sustainable modes of transport along this corridor and as a result the demand for private vehicular travel along the M11/N11 has continued to escalate.</p> <p>To assist in understanding the issues prevalent on the M11/N11 Corridor, TII has prepared the M11/N11 Corridor Study: Needs Assessment Report in consultation with key stakeholders, including Wicklow County Council. This study outlines improvement works, consistent with those included in the NTA Transport Strategy, for the M11/N11 Corridor and elaborates further on off-network, i.e. complementary local transport measures required to facilitate the on-going strategic function of the M11/N11 national road corridor.</p> <p>The Council will be aware that TII issued the M11/N11 Corridor Study in April, 2017. The objectives of which are as follows:</p> <ol style="list-style-type: none"> 1. Identify the improvements required to: <ul style="list-style-type: none"> ▪ Bring the section of the corridor (M11/N11 mainline and junctions) up to the appropriate standard; ▪ Develop the regional and local road network to support local access and complement the corridor strategy, including the closure of all direct accesses; and ▪ Ensure the safe daily operation of the M11/N11 mainline and junctions in the event of the occurrence of incidents. 2. Identify a phased implementation of the improvements such that operational benefits on the corridor can be realised at an early stage without compromising the long term strategy. <p>It is acknowledged that the Draft Local Area Plan references the M11/N11 Corridor Study and indicates in Objective RO2 the commitment to <i>'support improvements to the national road by reserving corridors, as and when these are identified, of any proposed road improvements or new road construction free of development, which would interfere with the provision of such proposals. In particular, to reserve corridors along all potential route improvements / new routes identified in the 2017 Transport Infrastructure Ireland M11/N11 Corridor Study'</i>.</p> <p>TII considers that there is a need to align the objectives of the Draft Local Area Plan, 2017, with the improvements proposed in the M11/N11 Corridor Study in the interests of clarity and consistency. It is the opinion of TII that explicit provision for the improvement objectives outlined in the M11/N11 Corridor Study within the Draft Local Area Plan would provide a clear basis for any subsequent statutory applications to implement the improvements identified and would also provide clarity for private development interests in the area.</p> <p>In that regard, TII recommends the amendment of Objective RO2, and associated mapping, including Kilmacanogue, to include the specific proposals outlined in Table 5.7 of the M11/N11 Corridor Study as</p>			

follows;

- Additional lane capacity on the M11 between Junction 4 (M50/M11) and Junction 5 (Bray North) and between Junction 5 and Junction 8 (Kilmacanogue),
- Junction 6 and Junction 7 Capacity Improvements and related pedestrian and cycling improvements,
- Local link road between Herbert Road and Upper Dargle Road, identified in Objective RO6 of the Draft MD LAP,
- Junctions 6a (West & East); Closure of direct accesses on both sides of the N11 at Junction 6a with provision of service roads to ensure alternative safe access to the N11 for the R117 (Enniskerry Road) and Herbert Road,
- Junction 8 Kilmacanogue Service Roads; Construction of parallel one way service roads north of Junction 8 Kilmacanogue, addressing issues in relation to direct access,
- Improved local road network to the west of M11 between J4 and J6 to enhance resilience of wider network,
- Address issues such as direct accesses and undertake junction improvements along the M11/N11 corridor between Junction 8 (Kilmacanogue) and Junction 14 (Coyne's Cross).

The M11/N11 Corridor Study identifies that other measures such as at Junction 5 (Wilford), etc. will be necessary to facilitate the ongoing development of Wicklow. The form and implementation of these measures will depend on the development of adjacent lands and other transport proposals such as public transport, etc.

2. Area Based Transport Plan

The DoECLG Spatial Planning and National Roads Guidelines emphasise the importance of developing an evidence based approach to planning policy where local area planning proposes development to take place on zoned lands adjacent to national roads which could affect the operation and capacity of the national roads.

Based on the inclusions in the current Draft Bray Municipal District Local Area Plan, TII does not have sufficient confidence that development proposals could be accommodated without significantly impacting on the safety and capacity of the strategic national road network in the area which would be contrary to the provisions of the DoECLG Spatial Planning and National Roads Guidelines.

Wicklow County Council, reflecting the existing challenges to sustainably facilitate growth in Bray, indicated in the recent planning application ref. 16/999, that the NTA were to undertake a Bray and Environs Transport Plan. Such a transport plan should underpin the development of a new statutory land-use plan for Bray and could provide for the integration of development and infrastructure to facilitate new development, including at Fassaroe.

Significant work has been undertaken in relation to the NTA Area Based Transport Plan for Bray and Environs and its delivery is imminent. This Area Based Transport Plan will assist in informing land use and transport policy in the MD Plan area in the interests of developing a sustainable and integrated land use and transport planning framework to guide development, including identified growth areas such as Fassaroe.

TII, therefore, considers that it is essential that the Draft Bray Municipal District Local Area Plan is fully informed and, if necessary, amended to reflect the NTA Area Based Transport Plan for Bray and Environs in relation to location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals prior to the adoption of the plan.

3. Specific Policies and Objectives

The Authority recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the local area plan concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Noise requirements and Signage, etc.

The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Municipal District Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

Opinion of Chief Executive

1. While the request for additional detail in Objective R02 is noted, no changes are recommended as it is not considered necessary or prudent to amend Section 8.1.5 and Objective R02 include detailed objectives for recommendations that are only at the feasibility stage, as to do so could preclude alternative solutions at later stages of the design process which could be in effect be a material contravention of the plan.
2. WCC is committed to ensuring that new development that occurs in the LAP area can be accommodated without significantly impacting on the safety and capacity of the strategic road network, subject to (a) the required improvements to M11/N11 and (b) the requirement improvements to the local road network, public transport provision and walking / cycling infrastructure taking place. It is the TII's remit to address the former and WCC is working closely with all of the transport agencies to address the latter, particular through the development of the in-train 'Transport Study for Bray and Environs' and in many cases, the delivery of improvement will be a prerequisite of granting permission for significant development and may be carried out by the developer in conjunction with the Council.

It is hoped that the 'Transport Study for Bray and Environs' will indeed provide a framework for the delivery of the land identified for significant development in the draft plan, which is drawn up in accordance with the core strategy of the Wicklow CDP and the regional plan. It is considered that this study and the measures that will be set out therein will be a support for the spatial strategy already developed but that its purpose is not to 'inform' land use decisions e.g. dictate what land or what quantum of land should or shouldn't be zoned on the basis of existing infrastructure, as the TII seem to be suggesting.

3. With respect to Traffic and Transport Assessments, Road Safety Audits, Environmental Noise, Signage etc, these are addressed comprehensively in the Wicklow County Development Plan, and as a subsidiary plan, these provision shall apply directly in this LAP area. As set out in the introduction to the plan.

"The majority of policies, objectives and development standards that will apply in the Bray Municipal District are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area. While this will facilitate the streamlining of this plan to just those issues that are relevant to this area, and an overall reduction in the content of the plan, this should not be seen a diminution of the level of importance or indeed protection afforded to this area.

In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated. Any specific policies / objectives or development standards required for this area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans, and the general public alike".

Chief Executive's Recommendation

No change

Section 3.2

ELECTED REPRESENTATIVES

Submission Number	B1	Name	Deputy John Brady
Summary of Issues Raised			
1. SLO: 3 Former Bray Golf Course			
<p>The 8.6 acres of lowland adjacent to the Dargle River in the Old Bray Golf Club which is a floodplain be kept free from development. This long corridor of floodplain is not vital to the regeneration of Bray, and there is a clear alternative to building on it. I propose that this land would be zoned as Active Open Space and that the high ground in the Old Golf Club would be zoned Residential/Town Centre.</p>			
2. SLO: 1 Kilruddery			
<p>That the proposed New Residential Zoning in Kilruddery be removed, the Foggy Field should be looked at as an alternative location for R20 zoning. No development should be permitted above the 60m contour line within Kilruddery.</p>			
3. R20 Residential			
<p>That the new proposed residential zoning behind Giltspur Wood and Charnwood be changed to Open Space.</p>			
4. Deepdales			
<p>Change the zoning for the undeveloped large green area in the Deepdales Estate, Bray from residential to Open Space</p>			
5. Recreational Amenities			
<ul style="list-style-type: none"> · Provision should be made for a Skateboard Park on the Old Golf Club lands. This would be ideally located close to the Fran O'Toole Bridge. · Provision should be made for additional playing pitches for the many clubs including Ardmore Rovers and Shamrock Boys to name a few. A running track could also be incorporated in a campus type facility where some of the services could be shared. Land should be zoned for this either on the Old Bray Golf Club lands or in the Action Area 1: Fassaroe. This should be included as an objective in the Fassaroe Area Action Plan. · An objective should be included to make Bray Harbour a centre of excellence for water borne activities. Land should be specifically zoned to develop a centre of excellence; this would cater for activities such as kayaking, canoeing, water boarding etc. 			
6. Former A O Smith site, Boghall Rd			
<p>A section of land beside the Killarney Rd Business Park should be rezoned to allow for some residential development. This would be specifically affordable accommodation for local people. The majority of the site should remain however for employment uses. This would include the area that is covered by a live planning application.</p>			
7. Tree preservation Orders			
<p>Tree preservation orders should be placed on the trees in the Glencormac Gardens in Kilmacanogue. This is currently the location of Avoca Handweavers. On the site there are many fine trees that should be protected, these include the Yew Walk. This is made up of 13 Yews, 12 are at least 800 years old and one is approximately 2,000 years old. There are also many Weeping Monterey Cypress trees, one is said to be the only mature specimen of the tree in the world. Other trees on site include Blue Atlas Cedars, Walnut, and Crimean Pines.</p> <ul style="list-style-type: none"> · A tree preservation should be included on the trees at Kilbride Hill, Killarney Rd. There is a broad mix of significant trees including Beech and Oak. These are important for the wildlife in the area which included Bats. 			

8. Greenway from Kilmacanogue to Southern Cross Bray

It should be an objective in this plan to develop a greenway from Kilmacanogue to the southern cross in Bray.

Opinion of Chief Executive

1. The zoning of lands at the former Bray Golf Course is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.6 of this report.
2. The zoning of lands at Kilruddery is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.3 of this report.
3. The zoning of lands at Oldcourt House (Giltspur Wood – Charnwood) is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.4 of this report.
4. The green areas in the Deepdales housing estate where developed as part of that estate and are an intrinsic part of the estate. It is zoning protocol that such spaces are zoned 'RE – 'existing residential' to reflect that role. If there is concern that such a RE zoning could lead to development on such lands, that would be prevented by objective CD5 of the plan – *"In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Non-community uses on such lands will not normally be permitted"*. No change is therefore recommended.
5. It is not considered appropriate to designate a specific site for a skate park at this time, as the plan provides for a range of zones where the development of skate park could be considered, and the choice of such a site is best left to the development management system, where residents can get a chance to participate in the process when they can see the detailed plans.

The plan has made for significant provision of new playing pitches in the district. There is no available land within the existing built up part of Bray (old town council area) and therefore lands for such use have been designated at the periphery at both Fassaroe and Kilruddery. In particular, a large district 'park' has indeed been zoned in Fassaroe extending to some 20ha / 50 acres, which would provide for a significant new recreational and sport facilities for the wider area including playing pitches, running tracks etc

Chapter 10: Lands of not less than 20ha shall be laid out and dedicated to parks and active / sports uses (this corresponds to land use zones OS1 and AOS, but not OS2). Lands identified as OS2 generally comprise open, undeveloped lands encompassing flood plains, buffer zones along watercourses, rivers and Natura 2000 sites, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity. These lands are generally not considered suitable for new development, including for park use, and shall not be included in the required 20ha major open space.

The plan already makes provision for improvement to Bray harbour with particular emphasis on water borne activities

Section 7.2: As a stakeholder in this area, it is objective of the Council to prepare a masterplan for the area in consultation with property owners which addresses the following objectives:

- *To encourage and facilitate the redevelopment of vacant or underutilised properties / lands for a range of uses, serving to both harbour users and the wider public including shops (particularly those relating to recreational use of the area e.g. sailing / fishing equipment, boat / canoe hire etc), boat/marine services, restaurants / cafes, clubs, community facilities etc;*

- *To encourage the development of residential uses in the area above commercial / community ground floors;*
- *Given the small land bank available, to encourage intensive and high density redevelopment and to encourage the development of higher buildings, with particular regard being taken of the historical and residential amenities of the area and especially Martello Terrace;*
- *To encourage more intensive use of the harbour for recreational use, to enhance harbour infrastructure and to consider the development of water-side marina infrastructure;*
- *To improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west.*

6. The zoning of lands at the AO Smith site is dealt with comprehensively and in light of all submissions received on this topic, Section 3.17(b) of this report.
7. The trees identified at Avoca Handweavers are already subject to a TPO. The trees at Kilbride Hill (Danish Embassy) are not currently subject to a TPO but WCC has been proactive in protecting any trees of value at this location in accordance with Bray Town Development Plan and County Development Plan objectives; in particular permission for housing development was refused in 2016 having regard to (a) the location of the site within the curtilage of a Protected Structure 'Kilbride Hill House' and the existing mature trees within the site and along the site boundaries, which make a significant contribution to the character and setting of the Protected Structure, (b) the objectives of the Bray Development Plan which states that *"it is the policy of the Council to preserve and protect structures included in the Record of Protected Structure., (c) the objectives of the Bray Development Plan whereby it is "the policy of the Council to protect trees, in particular native and broadleaf species, which are of conservation and/or amenity value"* and (d) the design and layout of the development, which included proposals to remove all trees along the boundary with the Herbert Road and the majority of trees along the eastern and northern boundaries in order to facilitate the construction of the proposed dwellings, the surface water attenuation area and to upgrade the existing entrance.
8. It is already an objective of the plan to develop a greenway from Kilmacanogue to the Southern Cross. This issue is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.5 of this report.

Chief Executive's Recommendation

No change

Submission Number	B2	Name	Deputy Stephen Donnelly
Summary of Issues Raised			
<p>Note: This is a very lengthy submission, and it was not viable given the wide range of issues raised to try to synopsise same. Therefore the entire submission is set out hereunder:</p>			
<p><i>There have been many successes in recent years for Bray, including the development of the seafront, evolution of national events like the Air Show and those at Kilruddery, upgrading of infrastructure including park, flood defence and roads, businesses expanding and new enterprises opening, to name but a few. Wicklow County Council, Bray Town Council and the local residents, businesses and community groups and workers deserve enormous credit for all of this.</i></p>			
<p><i>At the same time, we are all aware that even with these successes, Bray Municipal District faces urgent and material challenges in areas including housing, public transport, infrastructure, community and environmental sustainability. Some of these are entirely within the remit of local government. Others require national support, and I will be advocating strongly on behalf of the district to this end.</i></p>			
<p><i>While the population growth projections for the area will, and indeed already are, causing a range of pressures, this growth must be seen as an opportunity, with this new scale creating sufficient social and economic mass for new opportunities, including local employment and community facilities.</i></p>			
<p><i>The firm commitment within the draft LAP to maintain the distinctive nature and independence of other communities within the municipal district is very welcome. Listed below are some particular areas for consideration.</i></p>			
<p>1. Overall Vision & Development Strategy</p>			
<p><i>The vision, as laid out on page 3, is impossible to argue with, but it could be applied to almost any town in Ireland, or indeed the Western World – cohesiveness, safety, opportunity, good jobs, lots of housing, great public services, great leisure facilities, culture, and so on and so forth.</i></p>			
<p><i>The risk for such an all-encompassing mission statement is that in trying to cover everything, it ends up meaning nothing. As it stands, it's difficult to see what's NOT included. The result is a risk that neither the community, nor the groups involved in delivery of the plan, have any sense of mission that can buy in to.</i></p>			
<p><i>I wonder if there might be value to developing a mission statement recognisable as being for Bray? Or if that proves too specific, might the mission statement at least reflect some of the specific characteristics of Bray, its people and the local strengths and opportunities? Some of this is developed further on (e.g., pages 4 & 5), and might make sense to incorporate in the overarching mission.</i></p>			
<p>2. Factors Influencing the Strategy</p>			
<p>Bray</p>			
<p><i>Page 4 states that 'the town should primarily aim to attract high value foreign investment.' It would be useful to understand why this is the case. The story of FDI in Wicklow, including Bray, is decidedly mixed, and many of our successes are home-grown. While it may be an unfair characterisation, a pretty significant number of local business people looking to expand, or enterprises from other counties looking to set up in Wicklow, have expressed to me over the years their frustrations in terms of their experiences here.</i></p>			
<p><i>Significant new efforts have been made in the past 2 to 3 years, and it might be worth understanding why the focus should be on FDI rather than our own indigenous sector. Data on the following would be useful: What success has Bray had in terms of major FDI in the past ten years? What competitive advantages does Bray have over other locations in attracting such FDI? What level of indigenous job creation has there been in recent years? What's the potential for further indigenous expansion? What would happen if the plan read 'the town should</i></p>			

primarily aim to support the expansion of indigenous Wicklow and Irish enterprise and the incubation of new businesses'?

3. Physical Context

The high priority given to sustainable development within the plan, contextualising development around environmental protections, is fantastic to see, and if adopted will serve the people of Wicklow for generations to come. Specifically for Bray, it is welcome to see the analysis of all existing sites, to ensure maximum usage of lands available.

4. Residential Development

4 (a) Action Area 1: Fassaroe

I would like to add my support to proposals for this area to be developed for residential use, and welcome the position proposed; being that such development is integrated, and not piecemeal. It is essential that significant physical and social infrastructure is included in development from the beginning. Furthermore, the actual build out should be monitored carefully by WCC to ensure this happens on the ground.

I would like to make some specific recommendations.

- The 20ha proposed for parks at the development should place specific emphasis on the development of sport and active community facilities.
- This area has the potential to become a major sport campus serving all of North Wicklow. In particular, I am aware of the need for facilities for the following sports within the municipal district: Football (soccer); Hockey; Skating; Athletics; Boxing.
- That Bray Municipal District should endeavour to provide support to the development of these facilities, and work closely with the existing clubs to that end.
- That Bray Municipal District should consider appointing a suitable management company to run any such sport facility which is developed, and consider full ownership of such a company, as has been implemented successfully by WCC previously, ensuring that any profits generated are fully invested back into the facilities.
- As proposed in the draft plan, the development of this open space must take place in tandem with residential development, and be complete and available for new residents.
- Development should take place in order to make provision for public transport links (both LUAS and a high-quality bus corridor) and dedicated walking / cycling routes.
- A direct link between the development and Bray Town Centre should be provided until such time as public services are extended to the area.
- Priority consideration should be given within the area of proposed Greenway initiatives as they arise (a network of Greenways through Wicklow has the potential, over time, to become a source of very substantial value to Wicklow residents, and to attracting significant tourism).
- A commitment should be made to provide adequate ducting for broadband infrastructure as part of any development (to ensure a low cost for providing fibre to the premises).
- WCC should consider placing more emphasis on sustainability. While there is such an emphasis put in other places in the LAP, there is not such an emphasis on pages 56 and 57. The scale of the Fassaroe development provides a very rare opportunity to push the boundaries in terms of sustainable design, and it would be very interesting to see what's considered best practice around Europe, and seek submissions reflecting this ethos from potential developers.

4 (b) Carlisle Grounds

The Carlisle Grounds are an amazing resource to the town. I would not be in favour of any proposals which would see these grounds used for residential development. It should be maintained as a sports ground.

4 (c) SLO- 1: Kilruddery

There has been significant opposition from local residents to proposed further development in this area. While local residents accept that there is a housing shortage, they are determined to ensure that any further development would enhance the area, and not contribute to congestion and other problems. While I and other elected reps are engaging with the residents, it would be very useful for WCC to facilitate a forum where concerns could be shared, and ideas explored for development the local community would support.

5. Economic Development and Employment**5 (a) Jobs Ratio**

It is very welcome to see this focus on local job creation and what constitutes a healthy level of local employment. While Bray may be a transport hub, enjoying better public transport links than any other part of Wicklow, the transport infrastructure is under enormous pressure. While we must push for transport, and particularly public transport, networks to become more and more comprehensive, removing the need for commuter trips altogether is the best solution, bringing with it a substantial improvement to lifestyle and reduction in household cost.

5 (b) Film Industry

I welcome the firm commitment within the plan to resist and restrict proposals for change of use for lands zoned for film. Ardmore Studios is a major asset to the county as a whole, and its loss would have a damaging impact on the entire community. Strengthening the existing film hub within the county should be a priority and consideration for all future development. If the two existing studio locations in Wicklow can be supported in future development, Wicklow has the opportunity to establish itself as the pre-eminent county in Ireland, and perhaps as a global centre. However, there is significant competition for this, and multi-year delays could see this opportunity missed.

5 (c) OP1- Florentine Centre

The construction of the long-proposed Florentine Centre should remain a priority for the main street. The construction of this centre has the potential to reinvigorate the area in a similar manner to the success seen on the seafront.

In order to ensure this project is completed and embraced by the community, it is important that a sense of ownership is engendered in the community from as early a stage as possible. To this end, community involvement where possible should be a priority.

I would like to submit the following proposals ancillary to the development of the Florentine Centre:

- *The development of a scenic lane between the Eglinton Road entrances of the Florentine which leads directly to the Dart Station.*
- *The potential for community groups to participate in the development and on-going care of this scenic route.*
- *That consideration be given to the provision of funding for the clearance, design and upkeep of this area to local community groups.*

6. Transport Infrastructure**6 (a) Park and Ride**

One of the key factors which has led to the development of such a high level of congestion along the N11 is the inability of many residents to transition to suitable park and ride facilities. The development of these facilities, where need is identified, should be explored.

In particular, serious consideration is required for the provision of free park and ride facilities to promote modal shift, cognisant of avoiding commuter cars blocking parking access for shorter term retail trips during the day.

The park and ride facility in Greystones has proved to be a major resource for residents across the county. In the context of the development of a transport interchange at Bray Dart Station, further development may be possible.

6 (b) N11

Recent studies indicate that the N11 is in need of major investment in order to combat congestion which impacts the entire the county. Upgrades should be considered as part of a greater strategy to promote public transport where possible. I would ask:

- That Bray Municipal District work with the NTA to expedite the development of plans to combat congestion which impacts on the N11;
- That emphasis is placed on the benefits of this upgrade for not only the district, but the entirety of the south east;
- That any works conducted to upgrade the N11 take place in the context of a broader plan which promotes transition to public transport and walking and cycling.

6 (c) Walking and Cycling

Bray, and indeed all of Wicklow, is seeing an upsurge in cycling, both recreational and utilitarian. Unfortunately, our current road network can make this a dangerous endeavour for cyclists (e.g., Bray Head, Enniskerry Road) and can cause congestion for motorists. An ambitious plan for a safe walking and cycling network, in conjunction with a greenways programme, should be developed, with required capital expenditure estimated.

6 (d) Greenways

Greenways present an enormous opportunity to improve the leisure and tourist offering of the county. In particular, areas to the north of the county without an existing proposal for the development of greenways would benefit from the development of proposals which provide linkages with existing greenways. This could lead to the development of cycling routes which provide access to the entire county, but which also have access to public transport infrastructure.

Bray Municipal District should ensure that all proposals put forward are engaged with constructively, and that particular focus is placed on developing synergies.

6 (e) Luas Services

The long proposed extension of the Luas line to North Wicklow must be a consideration of further developments in the area. The extension of this service to the county has the potential to reduce reliance on private car usage, open up new employment opportunities for Wicklow residents, provide a new source of foot traffic for retailers in Bray and provide new opportunities to bring tourism to the county.

- In light of the development of competition, particular focus should be placed on ensuring that the infrastructure needed is in place.
- In light of the considerable capital required to complete such a project, consideration should be given to the provision of a similar service through the use of a high quality bus corridor in the interim before completion of the project. This would not be a replacement, but rather a precursor, to the extension of Luas services.

7. Education**Secondary Schools**

Particular consideration is required of the needs which may arise for additional secondary schools in the North Wicklow area, given the rapid population growth we are seeing.

8. Environmental Protection and Sustainability**Bray Harbour**

Bray harbour should be dredged, in particular in the context of the development of the area.

- This dredging should be carried out in tandem with the development of a master plan for the area.
- Particular focus should be placed on the use of the harbour to improve the recreational and tourism offering of the town.

- *Consideration should be taken of the needs of local clubs with an interest in the harbour.*
- *That any dredging works that do take place should take account of the concerns of local businesses.*

Opinion of Chief Executive

1. Vision: The point raised regarding the overall vision is noted and had a specific improvement been suggested, this could have been evaluated. Vision statements by their nature often tend to be general, as they are 'high level' and have to encompass 'everything' in fear of leaving out 'anything'. One must also bear in mind that this is not just a plan for 'Bray' but rather the entire Bray Municipal District, and in order to address the different characteristics of the various settlements and area within the district, Section 2.2, does indeed go on to expand on the various characteristics and challenges faced by each distinct area.
2. Factors influencing the strategy: An economic function of Bray to act as an attractor of 'high value foreign investment' is one of the already defined roles of Bray, as set out in the County Development Plan and the regional plan. It does not imply that Bray does not have a significant role also in being a location for indigenous and smaller enterprises. The goal to aim to attract high value foreign investment is not translated into any local policies or objectives, or restrictions on the development of land, such that only such foreign investment would be permitted or indeed any action of the Council Economic Unit; in fact the policies of the plan, in addition to the policies of the County Development Plan, make it abundantly clear that the aim is to attract both indigenous and foreign investment as well as small scale enterprises (Bray MD plan – p14, Objectives E1, E5, E8, E9; County Development Plan EMP1, Emp16, EMP18, EMP19).
3. Noted
4. Residential development:
 - (a) Fassaroe: With respect to the suggestions made:
 - The land designated for OS and AOS are clearly earmarked for active and passive uses, such as sport and community facilities as suggested
 - It is agreed this area has the potential to be developed as sport campus for north Wicklow
 - The Council will indeed endeavour to secure the delivery of such a facility
 - The management and ownership of any such facility is an implementation and operational issue, not a matter for a land use plan and will be dependent on funding being made available, as well as cooperation / agreement of landowners
 - The plan clearly requires open space and community facilities to be developed in tandem with residential development (Objectives 2.2.6 and R3)
 - The development of Fassaroe is contingent on transport links and this is provided for in the plan (Objectives PT1, PT2, PT3, PT5, PT6, PT7, R04, Chapter 10)
 - The plan already makes provision for the inclusion of greenways in Fassaroe (Objectives GI1, GI2, GI5)
 - With respect to infrastructure for broadband, this is dealt with through condition attached to planning permission and is already supported by Objective T1 of the County Development Plan (Section 9.4.3) and therefore no specific objective is required in this plan
 - It is not made clear in this submission what exactly is being requested in terms of enhanced sustainability – development anywhere in the plan area, including Fassaroe will be required to meet the highest standards in design, open space, connectivity, energy etc in accordance with various guidelines e.g.
 - Best Practice Urban Design Manual
 - Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities'
 - Design Manual for Urban Roads and Streets
 - Sustainable Residential Development in Urban Areas

- Quality Housing for Sustainable Communities
- Recommendations for Site Development Works for Housing Areas
- The Planning System and Flood Risk Management

(b) Carlisle Grounds – there is no proposal to change the zoning of these lands.

(c) Kilruddery: Opinion raised with respect to Kilruddery is addressed comprehensively in Section 3.3 to follow.

5. Economic Development:

(a) Jobs ratio – noted. All efforts are being made to enhance both employment and transport infrastructure in Bray to give citizens the opportunity and choice to work locally and without commuting.

(b) Film Industry – Noted

(c) Florentine – general points are noted. With respect to the development of a community 'scenic lane' described (from Eglinton Road to the Dart Station), it is assumed that the submitter is referring to 'Stable Lane' which is an access lane serving the rear of private properties on Quinsborough and Florence Roads. It is not clear how this could be developed into such a 'scenic' route given (a) it provides for vehicular access to numerous properties, (b) many of the buildings along the lane are domestic and light industrial style garages and workshops, not particularly attractive or 'scenic' and (c) the lane is, in many parts, not well overlooked and therefore may not be ideal as pedestrian route.

6. Transport

(a) Park and ride: This is already addressed in the plan in Objective PT3

(b) N11: The Council is committed to working with and supporting the work of the NTA and TII in the improvement of the road network in the area, including the N11 and the plan clearly set out the Council's position in this regard.

(c) Walking / cycling: The Local Authority is committed to enhancing footpaths and pedestrian facilities on the most highly trafficked and / or problematic routes on an ongoing basis as funding allows. The Local Authority is also committed to implementing the NTA's Greater Dublin Area Cycle Network Plan as it applies to Bray and surrounding areas, as funding allows.

(d) Greenways: the plan supports the development of greenways as suggested

(e) LUAS: The ultimate decision with regard to the delivery of LUAS to Bray is a matter for the TII and the Government; however, the provisions of the plan fully support and seek the delivery of such infrastructure. In advance of or in the absence of LUAS, the plan fully supports the development of a bus based alternative system and the Council is actively working with the NTA and TII to deliver such an enhanced service.

7. Education – noted; plan makes provision for secondary school facilities.

8. Environmental protection and sustainability: The dredging of the harbour is not a matter for a land use framework (this is an operational matter). The plan sets out detailed objectives for the development of the harbour that align with the submitter's suggestions.

Chief Executive's Recommendation

No change

Submission Number	B3	Name	Deputy Andrew Doyle
Summary of Issues Raised			
<p>Deputy Doyle believes that this plan needs to be beneficial to new and existing residents in the Bray Municipal District and that the LAP should encourage employment, tourism, residential development and an increase in community facilities for local needs. After examining the Draft Bray Municipal District local area plan 2017-2023, Deputy Doyle has the following issues to raise:</p> <p>1. Kilruddery</p> <p>(a) Deputy Doyle believes that the proposed rezoning of up to 12 hectares of land for 240 residential homes in Kilruddery West Demesne, Zone 2 to R20 new residential is incorrect. This land should remain AG or OS2 for the following reasons:</p> <ul style="list-style-type: none"> ▪ Zone 3 has flooded in the past and residents believe that there is a potential risk of increased flooding if more of the foothills of the mountain are built up for housing. ▪ Residents and landowners are concerned about the location of the proposed access to this residential land if it is rezoned. In the proposal the housing would be accessed through the existing estate road which does not have the capacity to cater for this traffic. ▪ A physical boundary would need to be built if this housing development was to go ahead. He believes that this would put an end to the connection from the House and Gardens to the Kilruddery lands to the west. <p>In summary he believes that the underdeveloped lands around Kilruddery/ Giltspur and Hollybrook should not be considered for new houses due to the concerns outlined above. This land should remain as OS2 to protect and enhance existing open, undeveloped lands. The urban boundary should be pushed back to Zone 2.</p> <p>(b) Deputy Doyle believes that Area 4 in Kilruddery frequently know as Foggy Field which is currently zoned. T (tourism) KD should be changed to Residential Low Density R20. This piece of land is more suited for residential use due to its location off the Southern Cross roundabout and located beside a small number of retail offices.</p> <p>(c) To facilitate employment uses on the existing zoned land to the south of the Bray Business Park currently zoned R3, area 3 E – Special Employment zoning should remain the same.</p> <p>2. Deputy Doyle supports the development of enhancing and developing greenways in the Bray Municipal Area, the development of the greenways will provide a much needed amenity and resource for the local area. Other communities have benefited from the development and enchantment of greenways and this has brought many tourists into the area. Bray Greenways should become a destination for visitors for the local area.</p>			
Opinion of Chief Executive			
<ol style="list-style-type: none"> 1. The zoning of lands at Kilruddery is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.3 of this report. 2. The plan already makes provision for the inclusion of greenways in the district (e.g. Objectives GI1, GI2, GI5) 			
Chief Executive's Recommendation			
No change			

Submission Number	B4	Name	Cllr Steven Matthews
Summary of Issues Raised			
<p>Cllr Steven Matthews wishes to make the following submission on the draft Bray LAP 2017:</p> <ol style="list-style-type: none"> 1. Rezone the AO Smith site as new residential at a suitable density 2. Include an objective to implement the 2008 Ministerial SAAO for Great and Little Sugarloaf Mountains 3. Retain the shopfront design policy from the Bray Town Development Plan in the LAP 4. Map the curtilage of Kilbride House (protected structure) 5. Remove proposed new residential R20 zoning from Kilruddery land 6. Include an objective to create a 'safe route to school' connecting from Novara Avenue to Vevay Rd providing a safe walking route for St Thomas/BIFE/North Wicklow ET to St Patricks, Scoil Ui Cheadaigh and St Cronan's and Loreto Secondary Schools. The aim of which is to promote walking/cycling in a safer environment and also reduce car congestion at Vevay hill during school opening/finishing times. 			
Opinion of Chief Executive			
<ol style="list-style-type: none"> 1. The zoning of lands at the AO Smith site is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.17(b) of this report. 2. The Ministerial order for a Special Amenity Area Order was based on boundaries that were in the then County Development Plan. A SAAO must be based on evidence, and when a scientific study and analysis was undertaken, the boundaries in the Ministerial Order would not have stood up to a court challenge, and alternative scientifically based boundaries were proposed, and the SAAO process was proceeded with, which was turned down comprehensively by the elected members. In accordance with the decision of the members, this objective was removed from the County Development Plan. There does not appear to be a consensus in favour of reinstating this objective, and it is thus not recommended. 3. The shop front design policy quoted is already built into the County Development Plan (Appendix 1, Section 5), the provisions of which apply directly in Bray 4. The mapping of the curtilage of the protected structure is not a function of an LAP; it is intended once this LAP process is completed however to initiate a review of the RPS and to take into consideration any submission made to the LAP regarding protected structures, including the issue of curtilage definition. 5. The zoning of lands at Kilruddery is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.3 of this report. 6. The plan provides for such a route described – it is called a 'green route' rather than a 'safe route to school': <i>Objective R09 To promote and support the development of enhanced or new greenways at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links:</i> <ul style="list-style-type: none"> ▪ <i>San Souci Wood / Vevay Crescent - San Souci Wood – Sidmonton Gardens, with links to St. Cronan's, St. Patricks and St. Thomas's school sites and Novara Avenue / Sidmonton Road</i> 			
Chief Executive's Recommendation			
No change			

Submission Number	B5	Name	Cllr Brendan Thornhill
Summary of Issues Raised			
<p>Cllr Thornhill objects to the rezoning of land and the proposed development from OS4 to R20 on the following grounds:</p> <p>Traffic – this will result in more traffic chaos, congestion etc</p> <p>Flooding risks, there is evidence of flooding in this area</p> <p>Natural impact – it would impact on the natural beauty of the area.</p>			
Opinion of Chief Executive			
<p>It is not clear what land exactly is being referred to, but the only lands that appear be proposed for change from OS4 to R20 is the lands at Oldcourt House. The zoning of lands at Oldcourt House (Giltspur Wood – Charnwood) is dealt with comprehensively and in light of all submissions received on this topic, in Section 3.4 of this report.</p>			
Chief Executive's Recommendation			
No change			

SECTION 3.3: REZONING OF LANDS AT KILLRUDDERY ESTATE**Chapter 10 Specific Local Objective 1**

This section of the report deals with the submissions that have been made with respect to the rezoning of lands at Killruddery Estate. These lands are a Specific Local Objective 1.

Set 1: Elected Representatives

No.	Name	Issues raised
B1	Deputy John Brady	Requests that the proposed New Residential Zoning in Killruddery be removed, the Foggy Field should be looked at as an alternative location for R20 zoning. No development should be permitted above the 60m contour line within Killruddery.
B2	Deputy Stephen Donnelly	There has been significant opposition from local residents to proposed further development in this area. While local residents accept that there is a housing shortage, they are determined to ensure that any further development would enhance the area, and not contribute to congestion and other problems. While SD and other elected reps are engaging with the residents, it would be very useful for WCC to facilitate a forum where concerns could be shared, and ideas explored for development the local community would support.
B3	Deputy Andrew Doyle	<p>(a) Deputy Doyle believes that the proposed rezoning of up to 12 hectares of land for 240 residential homes in Killruddery West Demesne, Zone 2 to R20 new residential is incorrect. This land should remain AG or OS2 for the following reasons:</p> <ul style="list-style-type: none"> ▪ Zone 3 has flooded in the past and residents believe that there is a potential risk of increased flooding if more of the foothills of the mountain are built up for housing. ▪ Residents and landowners are concerned about the location of the proposed access to this residential land if it is rezoned. In the proposal the housing would be accessed through the existing estate road which does not have the capacity to cater for this traffic. ▪ A physical boundary would need to be built if this housing development was to go ahead. He believes that this would put an end to the connection from the House and Gardens to the Killruddery lands to the west. <p>In summary he believes that the underdeveloped lands around Killruddery/ Giltspur and Hollybrook should not be considered for new houses due to the concerns outlined above. This land should remain as OS2 to protect and enhance existing open, undeveloped lands. The urban boundary should be pushed back to Zone 2.</p> <p>(b) Deputy Doyle believes that Area 4 in Killruddery frequently known as Foggy Field which is currently zoned T (tourism) KD should be changed to Residential Low Density R20. This piece of land is more suited for residential use due to its location off the Southern Cross roundabout and located beside a small number of retail offices.</p> <p>(c) To facilitate employment uses on the existing zone land to the south of the Bray Business Park currently zoned R3, area 3 E – Special Employment zoning should remain the same.</p>
B4	Cllr Steven Matthews	Requests removal of proposed new residential R20 zoning from Killruddery land

Public submissions

Set 2: Individual submissions

A total of 141 no. individual submissions were received objecting to the rezoning of lands at Killruddery, one submission contained 15 signatures. The following issues were raised by all or some of the submissions:

No.	Issues raised
C2	1) Zoning
C3	Many of the submissions were against the zoning and rezoning of the lands at Killruddery. The main issues raised were:
C4	
C6	a) The zoning of Killruddery Estate to KD Killruddery Demesne Conservation & Tourism Zone
C10	b) The residential zoning on the lower slopes of the Sugar Loaf
C12	c) The new industrial zoning backing onto the industrial estate
C14	
C16	It was noted in submissions that the Managers Report for the 2009-2017 plan stated that <i>'proposals for development of the Tourist Zone should be relatively small scale to ensure the integrity of the Demesne is protected and retained'</i> , however in the Draft Plan the entire demesne is zoned for tourism. It is considered that the previous tourism zoning was efficient to meet the tourism needs without impacting on the integrity of the estate.
C18	
C28	
C29	
C32	
C33	Submissions received from Hollybrook Park Estate objected to the rezoning of the lands to the rear of the estate from agriculture to industry. Concerns were also raised as to the zoning of these lands without the proper infrastructure in place and objected to the removal of a 30m buffer zone behind Swanbrook.
C37	
C40	
C41	
C42	Submissions request that the green belt zoning be reinstated in this area.
C48	
C54	Other submissions queried the need for this zoning given the zoning in Fassaroe and Woodbrook, and sites such as the Dell site, the rear of Aldi, the golf club lands and the former A.O. Smith site which it is felt would be more suitable for residential development.
C55	
C59	
C60	
C63	Some of the submissions noted that in the 2009-2017 plan that the <i>'lands to the south of Bray were not considered suitable for high density residential and employment development given their location within an Area of Outstanding Natural Beauty and adjacent to an area that the Minister for DoEHLG has requested for a Special Amenity Area Order to the south'</i>
C64	
C65	
C66	
C67	
C69	There are fears that the loss of the 'Action Area Plan' status will mean that a Masterplan will not be undertaken and therefore a comprehensive, managed, integrated scheme will not be carried out for the Killruddery lands.
C70	
C76	
C77	Another submission queried if additional lands would be required for rezoning (residential, industrial) in the future.
C78	
C79	
C81	2) Transport
C85	Concerns were raised regarding the impact the proposed rezoning would have on traffic congestion in the area especially at the Southern Cross Road. Other submissions advised of the lack of public transport in the area, particularly at the Southern Cross Road. One submission noted that another new pedestrian crossing on the Southern Cross road opposite the entrance to the IDA Business Park is currently required and queried how the new zoning would lead to sustainable transport.
C88	
C89	
C90	
C91	
C93	

No.	Issues raised
C95	3) Existing and Proposed Infrastructure
C96	There were concerns regarding access and exits to the existing estates and existing amenities such
C97	as water and waste water. One submission welcomed proposed improvements '8.1.2 Public
C99	Transport PT3'. A number of submissions objected to the proposed walk / cycle way through
C100	Hollybrook Park.
C109	There are also concerns regarding the lack of retail services in the area to support additional
C110	housing.
C114	4) Flooding
C116	Many of the submissions raised concerns regarding flooding in the Hollybrook Park Estate and there
C117	are fears that additional development in the area will increase the risk of flooding and also result in
C118	a landslide similar to that in Donegal recently. Submissions also had concerns regarding the
C124	disclaimer which advised that the Council can accept no responsibility for losses or damages arising
C127	to assessments of the vulnerability to flooding of lands, uses and developments.
C129	A number of submissions noted in appendix II of the 2009-2015 LAP that the ground water
C130	vulnerability at the Killruddery site ' <i>varies from moderate to high to extreme moving from east to west</i>
C132	<i>through the Killruddery site</i> '. It is thought that development on these lands will compromise
C133	groundwater in the area.
C134	
C137	5) Impact on Tourism and Cultural Amenities
C138	A number of submissions had concerns that the rezoning of the lands at Killruddery would impact
C139	on the Estate as a tourism attraction in the area which would be a visual impact and deter people
C143	from visiting the area. It is felt that the rezoning would also impact on the existing amenities in the
C144	area which are scarce.
C145	Concerns were raised that access to these lands would be through the main gates of Killruddery and
C147	the impact this would have on the gates and piers which are protected structures. There were
C148	further concerns that this access could be changed.
C149	
C150	6) Lack of Public Consultation and LAP Process
C152	A number of submissions objected to the proposed rezoning due to a lack of information and public
C158	consultation. Another submission requests that all submissions should appear in the Chief
C159	Executives report as an appendix so that the Councilors can view all submissions.
C161	
C163	7) Environmental Impact
C164	A number of submissions objected to the proposed rezoning due to a lack of Environmental Impact
C165	Assessment and the general impact on the environment on both the existing housing estates, the
C166	Little Sugar Loaf and Killruddery Estate. The residents of Hollybrook Park are particularly concerned
C167	regarding the impact the proposal will have on the existing buffer between them and the industrial
C168	estate.
C169	One submission had concerns regarding the impact of the proposed rezoning on the habitat of the
C173	Barn Owl. Another submission had concerns for Red Kite, Pine Martins, sparrow hawks, badgers and
C174	squirrels.
C176	One submission requested that an EIS should be carried out on these lands.
C177	Furthermore a number of submissions have queried why the Ministerial Order directing the Little
C178	Sugar Loaf as a special amenity area was not adopted, with others requesting that this order be now
C181	put in place.
C184	8) Devaluation and Antisocial behavior
	Submissions had concerns that the new zonings would lead to devaluation of their properties and
	antisocial behavior.

No.	Issues raised
C185	
C187	9) Scale, Building Height and Density
C192	Concerns were raised regarding the scale of the development proposed and that building heights
C193	would be higher than existing buildings in the area leading to issues of overlooking and loss of
C195	privacy. Other submissions had concerns regarding the density of the proposed zoning.
C201	
C202	10) Other Specific Queries
C207	a) What is the benefit of the proposed zonings to the local people?
C213	b) Who has designated or requested this zoning?
C214	c) Will Social & Affordable Units be provided as part of this development?
C215	d) What guarantee is there that development would occur on the proposed zonings?
C217	e) How does Killruddery intend to finance, develop, run these and any other developments long-
C219	term?
C222	
C225	
C227	
C230	
C231	
C232	
C235	
C238	
C245	
C249	
C253	
C260	
C261	
C262	
C263	
C264	
C268	
C269	
C274	
C279	
C282	
C283	
C284	
C286	
C287	
C288	
C289	

Opinion of Chief Executive

Need for additional zoned housing land in Bray

As part of the plan crafting process, all derelict, abandoned, undeveloped or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development.

Every opportunity to meet the housing growth target from brownfield sites was taken, and in the majority of cases, a high density objective applied e.g. Heitons, former Dawson's, Dell, FCA, Brook House, Presentation College, Ravenswell, Everest, The Maltings etc. The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development, application of vacant sites levy etc.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; therefore, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands. The priority for such zoning is land in the existing built envelope of Bray, at its immediate periphery and at Fassaroe. Detailed consideration was given to whether some or all of the lands at Killruddery would be suitable for new residential development, and it was determined that a certain portion could be developed, without giving rise to adverse impacts. It is considered that the new zoning will provide significant buffers and public open space in keeping with the existing amenity of the demesne, new employment to the area and also provide a green corridor linking Killruddery to the Swan River 'greenway'.

It should be noted that the buffer zone to the rear of Swanbrook does not form part of the planning application for the housing development that is Swanbrook Estate and appears to have been constructed by the landowners of Killruddery. There are currently no proposals in the Draft LAP for the removal of this buffer zone.

Specific concerns

Impact on Local Infrastructure

Any development in this area will be subject to the normal planning and sustainable development standards as set out in the Wicklow County Development Plan and to detailed assessments as part of any planning application in order to ensure that existing infrastructure can accommodate any proposed new development and/or to identify additional infrastructure needs. The highest priority is always ensuring that the level of services / infrastructure to existing residents is not diminished or damaged by new development.

Concerns in relation to the increased traffic in the area are noted. WCC is committed to ensuring that new development that occurs in the LAP area can be accommodated without significantly impacting on the safety and capacity of the road network. WCC is working closely with all of the transport agencies to address local road improvements, particular through the development of the in-train 'Transport Study for Bray and Environs' and in many cases, the delivery of improvements will be a prerequisite of granting permission for significant development and may be carried out by the developer in conjunction with the Council.

It is intended that the Transport Study for Bray and Environs will provide a framework for the delivery of the land identified for significant development in the draft plan, which is drawn up in accordance with the core strategy of the Wicklow CDP and the regional plan. It is considered that this study and the measures that will be set out in the Draft Plan will be a support for the spatial strategy.

The Council will continue to provide for all components of the transportation system which are within its own remit and will encourage and facilitate the development of those other elements provided by external agencies.

With regard to water and wastewater infrastructure, these are services provided by Irish Water, who control and manage connections to existing systems to ensure that services are maintained to the required level.

With respect to retail and other commercial / community infrastructure in the Southern Cross area, the Local

Authority has invested significantly in sports and community infrastructure in the area, in particular through the development of the Shoreline Pool and Leisure Centre and as funding allows, is committed to further parks open spaces and community development in the area. With respect to retail facilities, the plan has made provision for the development of a neighbourhood centre in this area, and the enhanced objectives in relation to this site including in this plan are intended to kick start this development in the short term.

Foggy Field

The CE does not support the zoning of the 'Foggy Field' in lieu of the land proposed to be zoned in the draft plan for the following reasons:

- These lands are located directly northeast of Kilruddery House and are separated from the front of the house by a distance of only c. 120m (in comparison to the lands proposed to be zoned which are c. 500m from the house). The key vista into Kilruddery is from the north, and the development of housing here would undoubtedly irrevocably alter this vista and overall setting of the House and Demesne, which is a protected structure.
While it is acknowledged that the setting of the demesne has radically altered in the last 30 years, it was determined after detailed assessment that further development to the north and east of the house should be resisted and instead a development strategy that involved the zoning of lands to the west of the house, well beyond the house, garden and historic demesne forestry plantation. The lands proposed for zoning are not visible from the house or the main access routes into same, and as further protection, a significant green buffer is already built into the plan.
- These lands are much more open and visible from the surrounding and a housing development at this location would not integrate well into the local environment; this is a very prominent 'gateway' site into Bray from Bray head / Greystones and development here would undoubtedly diminish the setting and impression of the area. The lands' highest point at the SE corner is at the 80m contour. In comparison, the lands proposed for zoning are lower lying (not exceeding the 70m contour) and development here would not be visible from the surrounding area due to the topography of the land and existing trees cover.
- The lands measure c. 4.3 ha and therefore at average density of 20/ha, could have a housing yield of c.86 units. This is a reduction of c. 154 units from the lands proposed to be zoned. There is already a severe shortage of land in Bray and there is serious issue with this LAP not providing for adequate zoned land to meet Core Strategy population targets. Any reduction in zoning and potential housing may give rise to the plan not providing sufficient zoning to meet County Development Plan targets and indeed no zoning 'headroom'.

In addition, given the small size of the land involved, there would not be the potential to provide for any major open spaces or sports grounds on these lands, compared to the potential to provide a 5ha sports grounds on lands to the west of the house, as proposed in the draft plan.

Public Consultation

As per Section 20 (1) and Section 20 (3)(a)(ii) of the Planning and Development Act 2000 (as amended) a notice of the Draft Plan was published in the Wicklow Times on the 1st of August 2017 and the Bray People on the 9th of August 2017. Furthermore this notice was advertised on the Council's web page www.wicklow.ie and also on social media on the Council's Facebook Page. This notice detailed that a public information day would be held on the 15th of September 2017 and invited members of the public to same.

The Planning Authority received approximately 3,000 submissions in relation to the Draft Plan therefore it is not proposed to append a copy of same to the Chief Executives report. All submissions have been detailed in the Chief Executives Report and full copies of each submission can be viewed at the office of the Planning Department should any elected member or member of the public wish to view them.

Access

As part of the Draft Plan it is proposed to access the lands zoned for general employment via the Bray Business Park adjoining to the north. Vehicular access to the housing and open space elements shall be via the existing

Kilruddery entrance; additional pedestrian and cycling routes shall however be provided where opportunities arise e.g. via Giltspur Lane to the west and Hollybrook Park. The proposed accesses to this site are indicative only and will be subject to further assessment at planning application stage.

Scale, Building Height and Density

The estimated potential number of additional units indicated for each piece of land is indicative only. The actual amount of units that may be permitted on a site will be determined having regard to all normal planning considerations, such as access, site services, topography, flooding, heritage issues etc. However, in accordance with Objective HD5 of the County Development Plan, in order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands.

In this case given the pattern of surrounding development it is considered that 20/ha is the density format that would best fit with the surrounding area and not give rise to unacceptable adverse impacts.

Cognisance was taken of the levels and contours of the land and it was determined that maintaining zoning at or below the 70m contour line would provide for a development form that could be integrated into the hillside and suitably screened. The Draft Plan has an objective that no structure may be built above the 70m contour line and the ridge of no structure shall exceed 78m.

Environmental Impact - SAAO

The plan has been subject to numerous environmental assessments including Strategic Environmental Assessment and Appropriate Assessment, to ensure that significant adverse impacts can be identified and avoided in the crafting of the plan. Development proposed on these lands will be subject to Environmental Assessment if considered necessary at planning application stage.

The exact route for the greenways is not yet known so detailed assessment for impacts on important ecological features, and the impact on existing estates can only be carried out when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

The Ministerial order for a Special Amenity Area Order was based on boundaries that were in the then County Development Plan. A SAAO must be based on evidence, and when a scientific study and analysis was undertaken, the boundaries in the Ministerial Order would not have stood up to a court challenge, and alternative, scientifically based boundaries were proposed, and the SAAO process was proceeded with, which was turned down comprehensively by the elected members. In accordance with the decision of the members, this objective was removed from the County Development Plan. There does not appear to be a consensus in favour of reinstating this objective, and it is thus not recommended.

Impact on the Little Sugar Loaf

It is acknowledged that these lands are at the lower slopes of the Little Sugar Loaf; however these lands were surveyed and evaluated carefully to determine if development would be feasible without impacting significantly on the landscape in this area.

Impact on Heritage and Tourism

Notwithstanding this change in zoning on the Killruddery lands, the priority for this area remains the protection and conservation of this valuable heritage asset. The types of uses that will be considered in this area will not be prescribed but rather any development that is considered to enhance the conservation and tourism offer of the area will be considered open for consideration. Only those projects which show a direct link to enhancement of the estate and its visitor product will be considered for permission.

A Strategic Flood Risk Assessment has been carried out for the Draft Plan. As per the Strategic Flood Risk Assessment Sites, Map no. SFRA2 (a) the Kilruddery lands are not within Flood Zone A or Flood Zone B. However, the Draft Plan takes account of flooding and has included Objective FL3, *'Where a development is proposed in an area identified as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.'*

Furthermore Objective WI12 of the County Development Plan deals with Surface Water,

WI12 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.*

Devaluation and Antisocial Behaviour

Issues in relation to devaluation and antisocial behaviour raised in the submission are noted; however these are not matters for a land-use plan.

Response to Specific Questions

- a) The zoning of the land proposed would bring both badly needed housing to the area, but also a major new sports area of 5ha, as well as a linked greenway from Boghall – SCR.
- b) The proposed zonings have been considered by the Planning Authority. The purpose of this plan is to put in place a land use framework that will guide the future sustainable development of the Bray Municipal District. This plan, in conjunction with the County Development Plan will inform and manage the future development of the area. The role of land use plan is to put in place framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan. The lands at Killruddery have been reviewed by the planning authority having consideration for population and housing growth as set out in the new County Development Plan and associated Core Strategy.
- c) Should any development meet the criteria under Part V of the Planning and Development Act then Social Housing will be provided on these lands.
- d) There is no guarantee that these lands will be developed, it is the discretion of the landowner or a private developer to develop. The purpose of this plan is to put in place a land use framework that will guide the future sustainable development of the Bray Municipal District. This plan, in conjunction with the County Development Plan will inform and manage the future development of the area.
- e) Funding of private developments are not matters for a land-use plan.

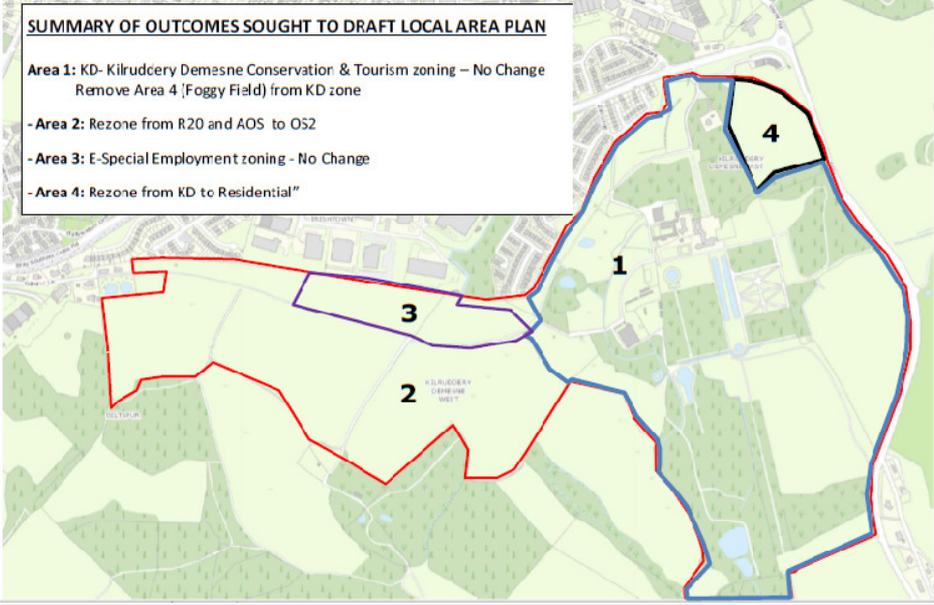
Chief Executive's Recommendation

No change

Set 3: Other submissions

No.	Name	Issues raised
C16	John & Anthony Brabazon	<p>A submission from the owners of Kilruddery Estate, who have requested the following changes as part of their submission. These changes should be read in conjunction with maps below.</p> <p>1) AREA 1 Retain "KD" zoning in Area 1 Remove Area 4 "Foggy Field" which is proposed for "Residential" zoning With the exception of the request to exclude the Foggy Field (Area 4) from the KD zone, the submission supports this new "KD" zoning.</p> <p>2) AREA 2 Rezone Area 2 From : 'R20' residential zoning and AOS (Active Open Space) To: OS2 - <i>To protect and enhance existing open, undeveloped lands'</i> The submission objects to this zoning for the following reasons:</p> <ul style="list-style-type: none"> • The owners are committed to the development of the Estate for tourism purpose and to enhance and conserve the historical estate. Residential development in the areas now proposed is not in keeping with their objectives and intentions for the estate over the next 10-15 years. On this basis, there is little point in rezoning lands that will not be developed for that purpose • The development of these lands for private residential development raises a multitude of issues for the day to day management of the estate and its growth as a tourism facility. The proposed residential zone is at odds with the use of the lands for various events which take place on a regular basis and which are intended to continue. • This lands which could yield 240 units would be accessed via the existing estate road which does not have the capacity to cater for the traffic that would be generated by the development. The investment required in terms of roads and services to these lands is significant and not sustainable. • A physical boundary would need to be created between any residential development at this location and the rest of the estate. These lands would need physical boundaries to be erected and would sever the House and Gardens from the Killruddery lands to the west (Killruddery Demesne West and Giltspur). <p>The open space zoning '<i>OS2- To protect and enhance existing open, undeveloped lands'</i> should be included in place of the residential areas identified in the Draft Plan – Area 2.</p> <p>The AOS (<i>Active Open Space</i>) zoning which is intended to provide playing pitches, playgrounds etc. for the residential zoned lands should also be removed</p> <p>3) AREA 3 Retain <i>E-Special Employment</i> zoning No amendment sought</p>

No.	Name	Issues raised
		<p>4) AREA 4 Rezone Foggy Field (4.3 hectares (10.6 acres)) From: KD To: Residential</p> <p>It is felt that Area 4 - 'Foggy Field' - provides a more suitable location within the Demesne for residential development. The field has an area of approximately 4.3 hectares (10.6 acres). The field is visually discreet and separate from the Killruddery House core area. It is located next to existing infrastructure and services and has the potential to physically integrate with the employment lands located outside of the estate that were acquired for the Bray Southern Cross Route. It is considered that residential development on these lands can better integrate with the Bray urban area and can be achieved without any adverse impact on the integrity of Killruddery Estate.</p> <p>The submission includes a sketch layout of the Foggy Field below (prepared by Anca Architects). This study is for illustrative purposes only and gives an indication of how a residential scheme might be accommodated in the Foggy Field. The sketch plan also gives an indication of how the site would operate in terms of access. Access can be provided from the existing estate entrance and potentially from a new access point off the R761.</p> <p>Subject to Wicklow County Council Roads Departments proposals for the Southern Cross Route and any future roads improvements, there is a further potential benefit associated with the provision of a new slip road along the curved northern/ eastern boundary of the Foggy Field which would improve traffic movement in the area and provide for the integration of the proposed residential lands with the existing adjacent employment lands which have further development potential.</p> 

No.	Name	Issues raised
		<div data-bbox="467 237 1401 842" style="border: 1px solid black; padding: 5px;"> <p>SUMMARY OF OUTCOMES SOUGHT TO DRAFT LOCAL AREA PLAN</p> <p>Area 1: KD- Kilruddery Demesne Conservation & Tourism zoning – No Change Remove Area 4 (Foggy Field) from KD zone</p> <p>- Area 2: Rezone from R20 and AOS to OS2</p> <p>- Area 3: E-Special Employment zoning - No Change</p> <p>- Area 4: Rezone from KD to Residential"</p>  </div> <p>Map No. 1</p> <p>5) To reflect the amendments sought by this submission the owners request that the strikethrough text below is deleted from the SLO for Killruddery and that the wording set out in red is accepted.</p> <p><i>'Kilruddery House and grounds are considered an important asset to the town and Bray, providing important cultural, recreational and tourism services to the area. It is an objective to support the ongoing protection of the house and gardens and their development as a visitor attraction, and to facilitate the growth of this business into other related areas, such as tourist accommodation, tourism retail, visitor centre etc.</i></p> <p><i>In the previous development plan, some lands surrounding the house and gardens were zoned for tourism use, with the majority given 'greenbelt' designation, while lands to the west / north-west of the house were zoned for housing and open space. In light of changed circumstances, including a new County Development Plan and associated Core Strategy, the previous strategy for this area has been reviewed.</i></p> <p><i>The development of these lands shall comply with the following objectives:</i></p> <ul style="list-style-type: none"> - <i>The lands immediately surrounding the house and garden are zoned in this plan 'Kilruddery Demesne Conservation and Tourism Zone' and this mixed use type zoning extends to the entire house and gardens, not just a limited area to the north. Notwithstanding this change in zoning, the priority in this area remains the protection and conservation of this valuable heritage asset. The types of uses that will be considered in this area will not be prescribed but rather any development that is considered to enhance the conservation and tourism offer of the area will be considered open for consideration. Only those projects which show a direct link to enhancement of the estate and its visitor product will be considered for permission.</i> <ul style="list-style-type: none"> ▪ <i>Former Kilruddery Demesne lands have in the past been released to the market and developed for a variety of essential uses such as for housing, employment</i>

No.	Name	Issues raised
		<p><i>and recreation. It is considered that such development has been successful in delivering much needed housing and employment to Bray, and did not unacceptably damage the historical and cultural setting of the main house and gardens. In this regard, given the extreme shortfall of suitable housing land in Bray and the high demand for housing in the area, and taking into account the Core Strategy of the Wicklow County Development Plan and the findings of the environmental sensitivity mapping carried out for the Strategic Environmental Assessment of this plan, it is considered that there is additional land at Kilruddery that may be suitable for new housing and active uses. Therefore this plan designates the area of the estate known as the 'Foggy Field' 12ha (4.3ha) of land for new housing (at density of 20/ha).</i></p> <p><i>-A key element of the revised concept is the delivery of a significant area of public open space of not less than 4ha, which shall be laid out as playing pitches, courts, playgrounds etc which shall be linked by a linear park to an existing area of wooded open space along the Bray SCR adjacent to Hollybrook Park, generally following the route of the stream. No housing may commence until such a time of the design, implementation plan and future management structure of this space has been agreed in writing with the Planning Authority. An additional area of 'buffer' open space shall be maintained in a natural condition between any housing development and Kilruddery House.</i></p> <p><i>- In order to facilitate commercial uses which may not be strictly linked to the tourism product on these lands, land is designated for general 'employment' use, generally to be accessed via the Bray Business Park adjoining to the north. The density, design and height of buildings in this area shall be particularly managed so as to ensure minimal visual impact on the area.</i></p> <p><i>-Vehicular access to the housing and open space elements shall be via the existing Kilruddery entrance; additional pedestrian and cycling routes shall however be provided where opportunities arise e.g. via Giltspur Lane to the west and Hollybrook Park.</i></p> <p><i>-The location of such uses are shown indicatively on the concept plan to follow, which is reflected in the zoning objectives but may be amended in light of best fit that arises on the lands. However, no structure may be built above the 70m contour line and the ridge of no structure shall exceed 78m.'</i></p>

Opinion of Chief Executive

The position of the landowner is noted. However the CE cannot support the development of the Foggy Field for the reasons already set out above. The members of reminded of their obligations to provide a development plan for the area that provides for the proper planning and sustainable development of the area and complies with the County Development Plan and in doing so must ensure that adequate land is zoned to meet the population and housing targets for the area, to ensure that housing can be delivered to meet the demand in the area.

The land proposed for zoning in the draft plan are considered the optimal on the estate and where it is determined that some additional housing would occur on the estate, these lands are much more favourable

No.	Name	Issues raised
		than the 'Foggy Field' particularly in terms of visual impact and the delivery and enhanced community open space.
Chief Executive's Recommendation		
No change		

SECTION 3.4: ZONING AT OLDCOURT HOUSE

This section of the report deals with the submissions that have been made with respect to lands at Oldcourt House.

Set 1: Elected Representatives

No.	Name	Issues raised
B1	Deputy John Brady	New proposed residential zoning behind Giltspur Wood and Charnwood should be changed to Open Space.
B5	Cllr Brendan Thornhill	<p>Objects to the rezoning of land and the proposed development from OS4 to R20 on the following grounds:</p> <p>Traffic – this will result in more traffic chaos, congestion etc</p> <p>Flooding risks, there is evidence of flooding in this area</p> <p>Natural impact – it would impact on the natural beauty of the area.</p> <p>Note: It is not clear what land exactly is being referred to in this submission; however the only lands that appear to be proposed for change from OS4 to R20 are the lands at Oldcourt House.</p>

Public submissions

Set 2: Proforma submission

No.	A total of 93 pro-forma submissions were received which object to the proposed zoning of lands at Oldcourt House for the following reasons:
93	<p>Settled Estate: This is a settled estate built around 1970 and is well established and just fit for purpose for the current amount of houses in same.</p> <p>Cul de sac: If re-zoning goes ahead this will give more access to houses either by walkway or road access.</p> <p>Traffic / Safety Issues: More development will in turn mean more traffic within the estate which will make it even more dangerous for people currently living in the estate and will create even more parking issues.</p> <p>Anti-social behaviour: Easier access for others also means more antisocial behaviour - there are already issues with regard to the back of the estate and youngsters, often not even from the estate, gathering and fires being lit and underage drinking taking place. Also there are already issues with regard to house break-ins, more access will provide more routes for thieves to escape un-noticed.</p> <p>Oldcourt Castle which is a historic site: This will be affected by this re-zoning. These sites should be protected at all costs as once development has taken place it is there is nothing than can be done to rectify this matter.</p> <p>Trees: There are many well established trees located at the back of the estate which form an integral part of the estate and should be protected and not simply chopped down or even if they are left in situ their roots may very well be damaged by any development taking place.</p>

House Value: How many and what type of houses are proposed in this land re-zoning. At the end of the day we all purchased our houses in a private estate. If there are to be social houses included in this development this will in turn affect the value of our houses.

Set 3: Individual submissions

A total of 152 individual submissions were received with respect to the rezoning of land adjacent to Oldcourt House, Charnwood and Giltspur Wood / Giltspur Brook, one submission consisted of a petition with 80 signatures.

	The following submissions all object to the proposed residential zoning at Oldcourt House for some or all of the following reasons.
C15	1. Health and safety
C17	Access to the land adjacent to Oldcourt House and Giltspur Wood would be through the cul-de-sac and green area of Giltspur resulting in noise, lack of privacy, large amounts of traffic and heavy goods vehicles during construction leading to safety concerns. A number of submissions also raised concerns regarding security, antisocial behaviour and the loss of open space impacting on the quality of life of the existing residents. One submission noted that there are a large number of rats in the area and had concerns regarding building works in the area disturbing them and causing an infestation to the neighbouring estates. Another submission advised that they had a serious health condition and required a healthy environment.
C18	
C26	
C27	
C30	
C34	
C35	
C38	
C39a	
C45	
C49	2. Traffic Congestion
C50	Recent changes to traffic management in the area have resulted in traffic delays. Further development in this area would increase traffic congestion and reduce parking.
C51	
C52	
C53	3. Flood Risk
C56	Many of the submissions raised concerns regarding the increase in flooding as a result of development in this area. This area is included in the 1 in 100 year flood zone. Many submissions suggest the retention of the existing embankment as a flood risk barrier. Concerns were also raised as to whether buyers would be able to get a mortgage and insurance for their properties given the fact that these lands are within a designated floodplain. Other submissions advised of significant flooding in Giltspur Wood a number of years ago. Another submission included a printout of a newspaper article from 2009 showing the flooding of the Swan River at the location of the proposed rezoning.
C57	
C61	
C62	
C71	
C83	
C84	
C98	
C102	
C111	
C112	Concerns were raised regarding the protection of trees and their roots in the area particularly oak trees which are part of the original Oldcourt Demesne. Order No. 5 covers all the trees on the proposed rezoned site.
C113	
C115	
C118	
C121	A number of submissions welcomed the proposed greenway along the Swan River in the Oldcourt Estate linking the River Dargle. It is noted in their submissions that there are a number of trees of historical importance at the bottom of this estate. It is suggested that the Council consider retaining the trees, hedges and embankment at the end of these gardens along with a buffer zone, thereby reducing any impact of new development and creating a natural barrier between estates. It is suggested that a 15m exclusion zone would protect the trees and their roots in the area. It was also suggested that the proposed rezoned land supports a variety of biodiversity. The proposed zoning would be contrary to Section 8.4.4.1 and 8.4.4.2 of the Bray Town Development Plan 2011-2017. Many of the submissions also had
C126	
C128	
C135	
C136	
C140	
C141	
C146	
C153	

C156	concerns that the existing open spaces / green areas would be lost as a result of any application on the subject lands.
C157	
C170	One submission advised that the trees in this area prevent soil erosion.
C170a	
C172	5. Heritage
C179	
C191	Many submissions noted that Bray has lost much of its cultural heritage and protected structures with others raising concerns regarding the protection of the 4 no. protected structures adjacent to the proposed rezoning, in particular Oldcourt Castle.
C199	
C204	
C206	
C208	
C212	6. De-valuation of property
C220	Concerns were raised that proposals for social housing would result in de-valuation of existing properties. One submission advised that had paid a premium for their end of cul-de-sac location, the proposed rezoning would mean a devaluation of their property.
C221	
C223	7. Zoning
C226	
C229	Many submissions queried the reasoning behind the rezoning and if the densities would be increased. Many further noted that there were other sites such as the Dell site, Bray Golf Club lands, the old Heaton's site and the Florentine Centre as more appropriate lands to zone for residential development.
C237	
C239	
C240	
C243	
C250	
C252	
C254	
C257	
C265	
C268	
C270	
C272	
C278	
C290	
C294	
C295	

Opinion of Chief Executive

Need for additional zoned housing land in Bray

As part of the plan crafting process, all derelict, abandoned, undeveloped or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development.

Every opportunity to meet the housing growth target from brownfield sites was taken, and in the majority of cases, a high density objective applied e.g. Heitons, former Dawson's, Dell, FCA, Brook House, Presentation College, Ravenswell, Everest, The Maltings etc. The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of issues on some sites to 'kick start' development, application of vacant sites levy etc.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; therefore, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands.

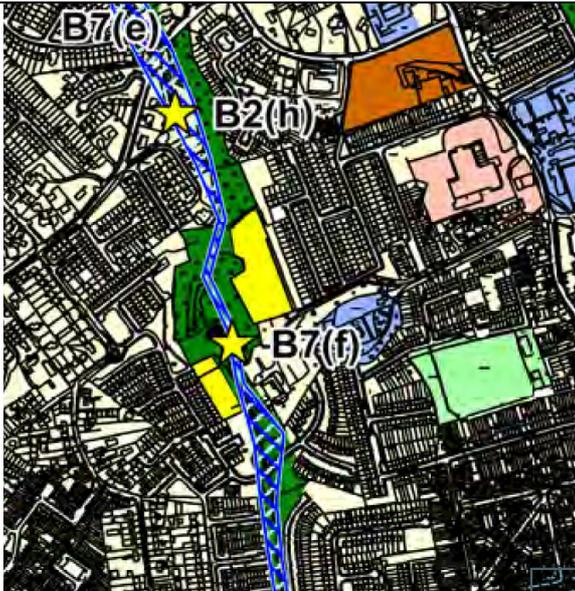
The priority for such zoning is land in the existing built envelope of Bray, at its immediate periphery and at Fassaroe. Detailed consideration was given to whether some or all of the lands at Oldcourt House would be suitable for new residential development, and it was determined that certain portions could be developed, without giving rise to adverse impacts.

Vision for Oldcourt

Having reviewed the entire landholding, it was determined that two small parcels of lands would be suitable for housing, as are shown as R20 on the draft plan. The overriding objective for this area however was to ensure the protection of Oldcourt House and Oldcourt Castle and their curtilage while also ensuring that the Green Corridor could be maintained. Therefore it was deemed that these 2 particular pieces of land would not interfere with these objectives and in fact, may aid in its more speedy delivery. The plan does not specify how access to these lands is to be provided, as this would be a matter for the design stage. A significant number of the objections received appear to be predicated on the basis that access would be via Giltspur or Charnwood – that is not specified in the draft plan. It was considered that given the relatively small size of the proposed zoning, resulting in a small amount of dwellings, that the additional traffic could be accommodated within the existing road network and would not result in adverse impacts.

Specific concerns

1. Concerns regarding the health and safety of those in the existing estates are noted; however the access route to the subject lands is not prescribed in the draft plan. Development proposals for these lands will be subject to further surveys and assessments at planning application stage; this will ensure that design and management measures can be developed to ensure the impact on existing areas / residents is minimal and can be absorbed by the receiving environment.
2. WCC is committed to ensuring that new development that occurs in the LAP area can be accommodated without significantly impacting on the safety and capacity of the strategic road network. Traffic generation is of importance when assessing planning applications in establishing whether or not a development proposal conforms to the proper planning and sustainable development of an area. It was considered that given the relatively small size of the proposed zoning, resulting in a small amount of dwellings, that the additional traffic could be accommodated within the existing road network and would not result in adverse impacts.
3. As can be seen from the extract of the Draft Flood Risk Assessment Sites Map no. SFRA 2(a) of the Draft Plan the subject lands are not within Flood Zone A or Flood Zone B.



The Draft Plan does however take account of flooding and has included Objective FL3 of the Draft Plan, *'Where a development is proposed in an area identified as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.'*

Furthermore Objective WI12 of the County Development Plan deals with Surface Water, **WI12** *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.*

4. Concerns regarding the impact on wildlife and the environment are noted. The plan has been subject to numerous environmental assessments including Strategic Environmental Assessment and Appropriate Assessment, to ensure that significant adverse impacts can be identified and avoided in the crafting of the plan. Every effort is made through the application of sound planning and environmental protection principles to (i) minimise the amount of 'greenfield' land designated for new housing and (ii) to assess and put in place design and management measures when new development is allowed to occur to ensure the impact is minimal and can be absorbed by the receiving environment.

With regard to the protection of trees in the area Objective B4 of the Draft Plan states *'To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network.'*

It should be noted that the Council is committed to ensuring sustainable recreational use of the outdoors in County Wicklow. The exact route for the proposed greenway developments are not yet known so detailed ecological assessment for impacts on important ecological features, including general ecological impact assessment and specifically Appropriate Assessment, is best carried out

when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

It is understandable that many of the submissions raised concerns regarding the loss of open space, however the lands at Oldcourt House are private property and are not open recreational spaces at this time and therefore there is no loss of amenity space.

5. Concerns raised with regard to the protected structures in Oldcourt are noted. The Council seeks to safeguard all protected structures and also structures which are not on the record of protected structures but which have merit and contribute positively to the landscape character and character of the area.

It is therefore an objective of the Draft Plan:

AH1 *To ensure the protection of all structures (or parts of structures) contained in the Record of Protected Structures*

and in the County Development Plan that:

BH11 *All development works on or at the sites of protected structures, including any site works necessary, shall be carried out using best heritage practice for the protection and preservation of those aspects or features of the structures / site that render it worthy of protection.*

6. Issues in relation to devaluation and antisocial behaviour raised in the submission are noted; however these are not matters for a land-use plan.
7. Following a detailed examination of brownfield sites within the town boundary it was determined that the majority of the housing targets for Bray could not be met on brownfield sites, therefore greenfield sites needed to be examined for their suitability for housing. The majority of the housing target can be met on lands at Fassaroe; however a small portion of lands was needed to make up the shortfall. Following the findings of the environmental sensitivity mapping carried out for the Strategic Environmental Assessment of this plan, it is considered that there is additional land at Oldcourt that may be suitable for new housing and active uses.

With regard to densities, the amount of units that may be permitted on a site will be determined having regarded to all normal planning considerations, such as access, site services, topography, flooding, heritage issues etc. However, in accordance with Objective **HD5** of the County Development Plan, in order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands.

8. House values raised in the submission are noted; however these are not matters for a land-use plan.

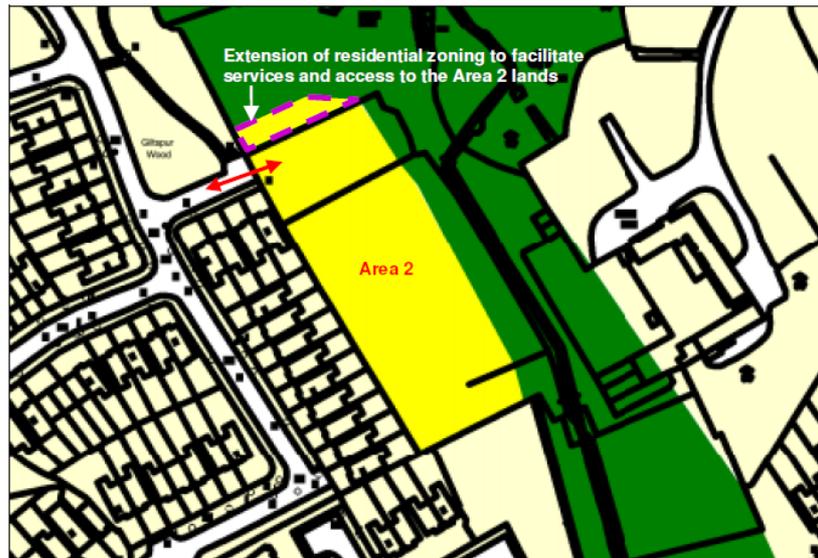
Chief Executive's Recommendation

No change

Set 4: Other submissions

No.	Name	Issues raised
C254	Rego Property (land owner)	<p>The submission addresses three specific areas on the landholding as detailed in the below map.</p>  <p>1. Oldcourt House and its environs that include the land either side of driveway: The majority of these lands have been rezoned as RE – Existing Residential. The rezoning of these lands is viewed as being appropriate, acceptable and in accordance with best planning practice. Therefore no material change to this zoning is proposed under this submission.</p> <p>With respect to the lands to the immediate west of the RE zone (proposed zoning – OS) it is requested that these lands be similarly zoned RE. As outlined under the attached flood risk assessment of the specific lands to the immediate west and south of Oldcourt House undertaken by Barrett Mahony, Consulting Engineers, there is little if any evidence of the potential for flooding on these lands, and given the applicants control of the downstream lands they have complete control of the ability to implement mitigation measures, and intend as a matter of course to remove the double concrete culvert that clearly forms a potential blockage to the flow of the river to the immediate north of the paddock that could create a potential flood.</p> <p>2. Lands bounding Giltspur Wood to the west of Oldcourt House: The submission requests that an objective be put in place for a <i>minimum</i> density of 20 units per hectare be achieved and that all development proposals on such land should be assessed on their own merits having regard to their impact on adjoining residential amenity/ pattern of development.</p> <p>The submission advises the Planning Authority that a legal right of access is available to these lands from the Giltspur Wood estate at the north-west corner of the lands. In order to avoid access issues and the provision of infrastructure and services, it is requested that an additional area be zoned for</p>

residential purposes (see map below) –



3. Lands to the north east abounding Charnwood: It was suggested that lands to the north east abounding Charnwood which have been zoned R20 - New Residential in the Draft Plan should be extended to an area of 1.9ha as per the map below be subject to a masterplan with have a density of not less than 50 units per hectare.



Opinion of Chief Executive

1. The suggested change in zoning from OS to RE to the west of Oldcourt House is not supported both in the interests of flood prevention, the protection of Oldcourt Castle and its curtilage and the provision of meaningful and sufficiently wide green corridor in this area.
2. The estimated potential number of additional units indicated for each piece of land is indicative only and sets out the Planning Authority's general position on the type and density of development it will consider on a site, given the pattern of surrounding development and any environmental constraints present. In this case, it is considered that 20/ha is the density format that would best fit with the surrounding area and not give rise to unacceptable adverse impacts.

With regard to the request for additional lands to be rezoned RE to the north-west of Area 2 these lands are located to the north of the existing road network and would entail zoning additional lands which would be in close proximity to Oldcourt Castle and curtilage, a protected structure. For these reasons the rezoning of these lands is not supported.

3. The proposed extension of the zoning to the west of Charnwood is not supported. The area that is proposed to be zoned is limited to an existing 'field' that does not appear to have any particular environmental assets in need of protection and appears suitable for development in terms of topography, flood risk etc. However, beyond this delineated area, one moves into the more natural Swan River valley, with its natural woodland vegetation, steeper topography and mature protected trees. These lands are considered to be essential to maintain as OS to protect the Tree Protection Orders in this area and maintain the green corridor, and its associated benefits to biodiversity, human health and flood prevention.

Chief Executive's Recommendation

No change

SECTION 3.5: ZONING, ROAD AND GREENWAY OBJECTIVES KILMACANOGUE

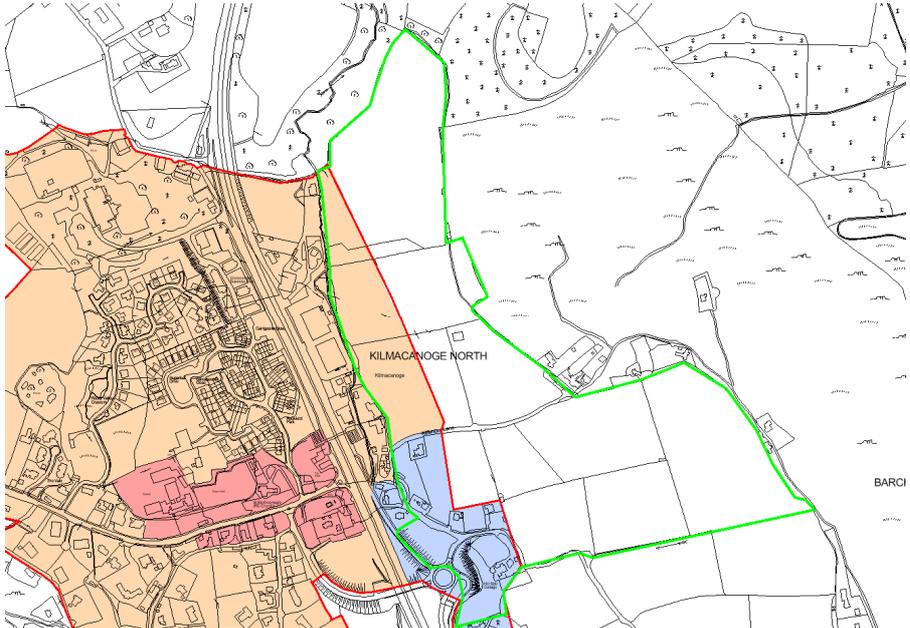
This section of the report deals with the large number of submissions that have been made with respect to a number of distinct but interrelated issues, namely Objectives R08, R09, the zoning provisions for the eastern side of Kilmacanogue and the protection of the landscape and heritage of the lower slopes of the Little Sugarloaf.

SET 1: Elected Representatives

No.	Name	Issues raised
Elected Representatives		
B1	John Brady TD	It should be an objective in this plan to develop a greenway from Kilmacanogue to the southern cross in Bray.
B4	Cllr S Matthews	The plan should include an objective to implement the 2008 Ministerial SAAO for Great and Little Sugarloaf Mountains

SET 2: Individual public submissions

No.	Name	Issues raised
		While these were individual, rather than 'proforma' submission, they all raised some or all of the following issues in objection to the roads, greenway and zoning proposals for the eastern Kilmacanogue area:
C29	Brennanstown Riding School	<p>The proposed road and re-zoning of the lands at the Little Sugar Loaf should be omitted and an SAAO should be created for the Sugar Loaf mountains, with the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal is contrary to the vision and goals of the CDP. It will destroy this 'area of outstanding natural beauty' and detract from the views of the Little Sugar Loaf. 2. The SAAO order of 2008 for the Great and Little Sugarloaf Mountains was ignored and not implemented by WCC. It is requested that an objective is included in the LAP to create an SAAO for the Great and Little Sugarloaf Mountains. 3. The destruction of the greenbelt will lead to the subsuming of Kilmacanogue into Bray environs. This is contrary to the CDP vision and goals. 4. The area proposed for rezoning is an essential amenity for walkers. 5. The proposed roadway (objective R08) is superfluous and the combination of the 'greenway' and the 'distributor road' is a precursor for a new road between Kilmacanogue and Bray. The objective for this road in the current CDP 2016 should be removed. TII thinks such a road is superfluous to requirements and not necessary. The need to address the access problems of the businesses and housing alongside the section of the N11 roadway can be addressed by implementing the TII's proposal to provide a 'local service road' at this location which would simple, sensible, cost-effective and does not impact on the slopes of the Little Sugar Loaf. The Southern Cross Road in Bray causes much of the traffic and the proposed road will just relocate the traffic jam from Hill's roundabout to Kilmacanogue. 6. These proposals do not take into consideration the needs and wishes of the majority of the locals.
C32	David Browne	
C43	Mary and Kevin Cahill	
C66	Tim Cookson	
C73	Ben Crowley	
C74	Mark Crowley	
C75	Pauline Crowley	
C80	Deepdales Residents Association	
C86	Barbara Moore-Devine	
C87	David Devine	
C104	Rebecca Drew	
C119	Fiona Fitzgerald	
C122	John Flynn	
C154	Claire Hyland	
C160	Colman Kelly	
C162	Michael & June Kelly	
C198	Catherine McStay	
C203	Esther Moore	
C210	Raymond & Etain Murphy	
C228	Phil O Donnell	
C251	Hugh Quigley	
C257	Keith & Meave	

	Robinson	7. The roadway will have a negative impact on the riding out facilities and security for Brennanstown Riding School
C258	Nicholas Robinson	
C261	Michelle Rogers	
C266	Veronica Smith	
C269	Diane Sutton	
C276	(Kay) Tighe Family	
C285	Merriall Wearan	
C292	Lesleyann & Eoin Wylie	
C189	Thomas McDonald	<p>This submission is on behalf of Thomas McDonald, the personal representative of James Byrne (the deceased owner of the lands highlighted below). The submission is with regard to the lands at the following location:</p>  <p>It is considered that the proposed road and rezoning will have a serious impact on the submitters farm resulting in his access to water closed off by the proposed development</p>

No.	Name	While these were individual, rather than 'proforma' submission, they all raised some or all of the following issues in support of the roads, greenway and zoning proposals for the eastern Kilmacanogue area:
C105	Finton, Mark & Margaret Driver	The proposed road is the answer to the traffic hazard for the residents of the dwellings on the N11 between the Topaz garage and the lavender field. The TII's proposal to add additional lanes will still have the same entrances and will not work.
C108	Pat, Mary, Barry, Niamh & Paul Driver	
C257	Keith & Meave Robinson	There is a need for a safe, vehicle-free access route from Kilmacanogue to Bray. Objective R09 sets the germ if the idea however as a priority the plan should include a greenway between Kilmacanogue and Bray, along the Kilmacanogue River. This would be a safe amenity route with direct access to the Dublin Bus service at balywaltrim. This greenway would be an extension of the Bealach Ó Chualann.

SET 3: Proforma Group 1

Name	Text of submission
Proforma Group 1 2,422 submissions received	<p>We are most upset to hear of Wicklow County Council's proposals to construct a new roadway commencing at the Kilmacanogue East roundabout, and routing Northwards to the boundary wall of Brennanstown Riding Stables and Equestrian Centre. We are even more upset by the Council's intention to pay for this unnecessary roadway by re-zoning the lower slopes of the Little Sugarloaf mountain as commercial and housing development land. We believe that this is just the thin end of the wedge, and that it is the Council's intention to complete their 2016 Kilmacanogue to bray mountain roadway proposal by stealth over time.</p> <p>1. An unnecessary roadway The roadway proposed by the Council is entirely unnecessary. It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.</p> <p>2. An unnecessary roadway paid for by unnecessary re-zoning The Council propose to pay for the proposed roadway by re-zoning the mountainside alongside it. The plan goes from bad to worse. This unnecessary roadway is now to be paid for by unnecessary re-zoning of unspoiled mountainside.</p> <p>3. A valuable local amenity will be lost. The lower slopes of Barchuilla Commons are an invaluable local amenity, and they are walked daily by many of the residents of Kilmacanogue village, as well as by large numbers of walking groups from further afield. The proposed roadway will isolate the village from this important open space, and will make it greatly more difficult to access, and unattractive to walk.</p> <p>4. Deer, pheasant, otters, lizard and pine marten The lower slopes to the east of Kilmacanogue village are a rich and diverse habitat which are home to successful and stable populations of deer, pheasant, otter, lizard, and pine marten. The proposed roadway will devastate this habitat. The deer will move away from the area, while the otter, lizard, and pine marten, being located immediately adjacent to the proposed site area will not survive.</p> <p>5. Views from Kilmacanogue to the Little Sugar Loaf compromised The existing views from Kilmacanogue village out over the Little Sugar loaf mountain will be greatly compromised by the Council's poorly thought out proposal. We have more than our fair share of traffic and roadways in Kilmacanogue, and it seems extraordinary that Wicklow County Council would entertain the construction of additional roadways on these unspoiled uplands.</p> <p>6. Description of panoramic vista from the Big Sugarloaf Mountain The proposed intrusion onto the slopes of the Little Sugar Loaf is of such a scale and crudeness, that it will detract greatly from the magnificent panoramic vista which has been enjoyed for hundreds of years by climbers of the Big Sugar Loaf Mountain. The vista from the Big Sugarloaf, eastwards towards the Irish Sea, is one of the great views of our country, and must be protected at all costs!</p>

	<p>7. This proposal will be strenuously opposed</p> <p>When the Council first proposed plans to encroach on the slopes of the Little Sugarloaf Mountain in 2016, there was widespread upset throughout the area, and a total of 1250 formal objections were lodged. The proposal now put forward by the Council will cause even greater damage to the Little Sugarloaf mountain, and will be strenuously resisted.</p> <p>We ask that this pointless proposal be omitted <u>entirely</u> from both the Wicklow County Development Plan 2016 – 2022 and the Bray and Kilmacanogue Local Area Plan 2016 - 2022</p>
--	---

SET 4: Proforma Group 2

Name	Text of submission
<p>Proforma Group 2</p> <p>16 submissions received</p>	<p>We are most upset to hear of Wicklow County Council's proposals to link the existing 'Woodies' roundabout on the Southern Cross Road directly to the eastern roundabout at Kilmacanogue Village. We believe that this proposal will eat substantially into the lower slopes of the Little Sugarloaf mountain, and that it will impact greatly on the visual and the environmental balance of the entire Kilmacanogue valley.</p> <p>1. A duty to protect our environment</p> <p>We believe that it is the duty of our Local Authorities to protect our environment, and particularly so where it is both beautiful and unspoiled. We believe that, in proposing this unnecessary roadway, Wicklow County Council is failing in that duty.</p> <p>2. We only have so many mountains</p> <p>We have a very limited number of mountains in this country and very few which are so close to our capital city. It is vital that we protect this unspoilt nature of these precious resources for the enjoyment of all our citizens, and particularly so, for those generations yet to come.</p> <p>3. Vista from the Big Sugarloaf</p> <p>The proposed intrusion onto the slopes of the Little Sugarloaf is of such scale and crudeness, that it will detract greatly from those magnificent vistas which have been enjoyed for hundreds of years by climbers of the Big Sugarloaf mountain. The vista from the Big Sugarloaf, eastwards towards the Irish Sea, is one of the great views of our country, and must be protected at all costs!</p> <p>4. Walking Barchuillia Commons</p> <p>Large numbers of walking groups, both local and national, access the upper slopes of the Little Sugar Loaf by way of Kilfenora lane and Barchuillia Commons. Indeed, these areas are trekked by walking groups on a daily and weekly basis. These unique unspoiled hills are some of our favorite and most accessible gems, and must not fall victim to poorly thought-out road planning policy.</p> <p>5. A rich natural habitat on the doorstep of Dublin</p> <p>The lower slopes of the Little Sugarloaf Mountain comprise a rich and diverse habitat, supporting large numbers of common deer, lizard, pine marten, and badger, not to mention pheasant, sparrow hawk, and a wide range of songbirds. Indeed, it is perhaps the nearest unspoiled habitat to Dublin City and, as such, should be treated as a valuable resource.</p> <p>We ask that this unnecessary roadway be omitted <u>entirely</u> from both the Wicklow County Development Plan 2016 – 2022 and the Bray and Kilmacanogue Local Area Plan 2016 - 2022.</p>

SET 5: Proforma Group 3

Name	Text of submission
Proforma Group 3 42 submissions received	<p data-bbox="354 304 699 340">Brennanstown Riding School</p> <p data-bbox="354 376 1481 689">We are deeply upset to hear of Wicklow County Council's proposal to construct a new roadway commencing at the Kilmacanogue East roundabout, and routing Northwards to the Southern boundary of Brennanstown Riding Stables and equestrian Centre. We are even more upset by the Council's intention to finance this unnecessary roadway by re-zoning the lower slopes of the Little Sugarloaf mountain as commercial and housing development land. We believe that this is just the <u>thin end of the wedge</u>, and that it is the Council's ultimate intention, to push ahead with the pointless Kilmacanogue to Woodies roadway over the course of the next two Development Plans, and to rescind the protected 'green belt' status which currently separates Bray from Kilmacanogue.</p> <p data-bbox="354 725 1481 1012">1. The Council's proposal is entirely incompatible with the activities of the riding school. The ultimate conclusion of the Council's response is that Brennanstown riding School and Equestrian Centre will find itself misplaced in an urban setting, entirely cut off from the vital 1000 acres trekking area which is so important to its survival. The imposition of commercial and residential development on this unspoiled mountainside is entirely incompatible with the activities of the riding schools, and particularly with the business of equine tourism. The presence of large roadways on both sides will make survival impossible. This proposal is simply outrageous!</p> <p data-bbox="354 1048 1481 1258">2. An important tourist amenity Brennanstown Riding School and Equestrian Centre attracts large numbers of visitors from both the greater Dublin area, and from countries right across the world. They come to enjoy the very best of horse riding in the most beautiful and unspoiled of surroundings. Wicklow County Council's insensitive proposal will obliterate this wonderful setting, and destroy a thriving and much-loved tourism amenity.</p> <p data-bbox="354 1294 1481 1469">3. Scenery and wildlife The wonderful mountainside trekking grounds which surrounds the riding school provide a rich and diverse habitat for large populations of deer, pheasant, badger, and otter, as well as for a wide array of small birds and wild flowers. This proposal by Wicklow County Council will destroy this magnificent uplands habitat forever!</p> <p data-bbox="354 1505 1481 1715">4. An unnecessary roadway The roadway proposed by the Council is entirely unnecessary. It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.</p> <p data-bbox="354 1751 1481 1895">5. An unnecessary roadway paid for by unnecessary re-zoning The Council propose to pay for the proposed roadway by re-zoning the mountainside alongside it. The plan goes from bad to worse. This unnecessary roadway is now to be paid for by unnecessary re-zoning of unspoilt mountainside.</p> <p data-bbox="354 1930 1481 2029">6. Another hurdle to surviving these difficult times Running a large tourism business is difficult, and outrageous proposals like this from Wicklow County Council do not help. We suggest that the business of our Local Authorities should be</p>

to support and to nourish conditions in which existing businesses can trade with confidence into the future.

7. Brennanstown Riding School has been associated with FAS placement programmes for many years, and has contributed to the successful training of large numbers of candidates. This proposal by Wicklow County Council will devastate these important programmes and make them entirely unworkable!

We ask that this pointless proposal be omitted entirely from both the Wicklow County development Plan 2016 – 2022, and the Bray District Local Area Plan 2017 - 2023

TOPIC E - Opinion of Chief Executive

1. Objective R08 – local access road

A significant number of the submissions state that they are opposed to the development of a road between Kilmacanogue and Bray Environs. There is no proposal in the draft Bray MD LAP to develop such a road. The Kilmacanogue Town Plan (part of the County Development Plan 2010 – 2016) had an objective *"To carry out a feasibility study and public consultation to investigate the possibility of providing a new road to the east of Kilmacanogue which would, amongst other things, provide alternative access to properties currently directly accessed from route N11."* **This objective is not included in the draft Bray MD LAP which will supersede the Kilmacanogue settlement plan upon adoption.**

Objective R08 of the draft Bray MD LAP seeks *"To provide for the development of a new route east of the Kilmacanogue Interchange that would serve (from the east) zoned lands and properties that currently are accessed only via the N11. No further development of any lands to the NE of Kilmacanogue interchange will be permitted unless access from the east (rear) is provided / available"*. In April 2017 TII published an 'M11/N11 Corridor Study', it is stated that *"The M11/N11 is of strategic importance nationally and this is reflected in its inclusion within the TransEuropean Transport Network (TEN-T) comprehensive road network. Therefore it is imperative that it begins to operate more efficiently."* Minimising the direct access off the south bound carriageway at Kilmacanogue will facilitate that the N11 will operate more efficiently at this location.

It is noted that the TII are investigating the option of developing a 'segregated lane' along the existing hard shoulder of the N11 carriageway in Kilmacanogue which would prevent direct access onto the N11 mainline from houses and businesses the east side of the road. This project would require vehicles exiting these properties to travel up to the roundabout to access the N11 mainline. Those on the mainline wish to exit at Kilmacanogue would be required to enter this segregated lane further north than currently arranged. This project, if implemented, would improve safety in this area but wouldn't 'solve' all of the design and safety issues associated with this area. Nor would it significantly reduce the traffic hazard for the dwellings fronting onto the N11. Furthermore, it is not considered a longer term solution for this area, as there could potentially be demand to increase the width of the mainline in the future. In these circumstances, it is considered prudent to plan for a local access road running tightly behind properties on the N11, which could allow for all residential and commercial entrances to be closed completely, and give the residents of these houses a safe entrance onto a lightly trafficked road.

The concept for this route is for a 2 lane, but modest (6m) local road, that would use existing roads to the east of the N11 where possible; however the design and specific location of this new short route would be decided as part of a planning application process where there would be an opportunity for the local residents to make submissions / objections.

2. Objective R09 - greenway

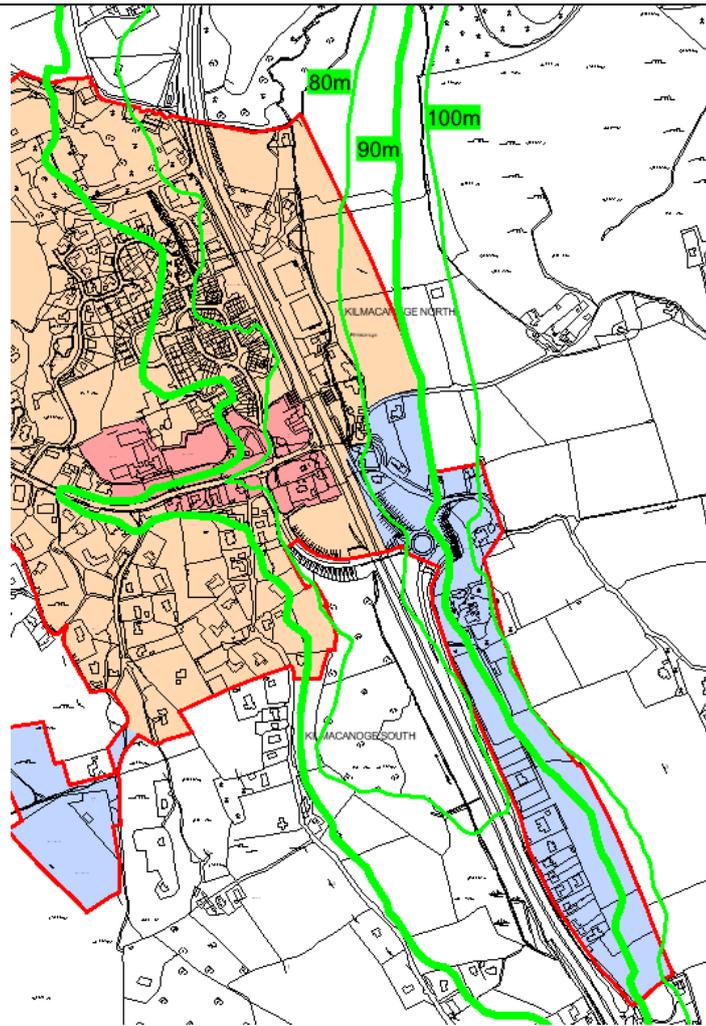
The Regional Planning Guidelines seeks that Green Infrastructure Strategies are included in Local Area Plans. River Corridors have been particularly identified as potential Strategic Green Infrastructure Routes in the County Wicklow Green Infrastructure Strategy 2016. Individually, each Green Infrastructure asset has an important role and benefit. These individual roles and benefits can be strengthened and enhanced when the sites/assets are linked together into a network of green infrastructure. Greenway's are a green corridor that is kept free of development where many environmental, social, and economic benefits can be achieved especially when the green infrastructure is proximate to where people live and work. The benefits include supporting habitats for wildlife, biodiversity, and fragile ecosystems, provide green buffers /green wedges between built up areas, enhance biodiversity, etc.

Objective R09 of the draft Bray MD LAP seeks *"To promote and support the development of enhanced or new greenways at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links - at Kilmacanogue River"*. This objective is not seeking the development of a vehicular road nor a formal pedestrian walkway. There are no current plans to acquire or purchase lands to forcibly create a public access route along this greenway; the Council of course is charged with using its resources to implemented the objectives of the plan and in the event that it is deemed that the development of a public access route is desirable, this would entail negotiation and agreement with any landowners involved in the first instance.

3. Additional 'Secondary Development Area' zoning of the Little Sugarloaf

Approximately 6ha of additional land is proposed to be zoned mainly for 'Secondary Development' east of the existing residential and employment development east of the N11. Road objective R08 seeks *"To provide for the development of a new route east of the Kilmacanogue Interchange that would serve (from the east) zoned lands and properties that currently are accessed only via the N11. No further development of any lands to the NE of Kilmacanogue interchange will be permitted unless access from the east (rear) is provided / available"* traverse these lands. Having regard to (a) the lack of land in the existing Primary Development Zone and Secondary Development Zone to accommodate the growth target and (b) the potential to provide for more employment to the rear of existing commercial properties, the lands adjacent to the existing development has been zoned accordingly.

It is acknowledged that these lands are at the lower slopes of the Little Sugar Loaf however these lands were surveyed and evaluated carefully to determine if development would be feasible without impacting significant on the landscape in this area. In this regard, cognisance was taken of the levels and contours of the land and it was determined that maintaining zoning at or below the 90m contour line would provide for a development form that could be integrated into the hillside and suitably screened (see map below). It is important to note that these lands are not currently open to walkers or for amenity use – they are fenced and gated agricultural lands.



4. Little Sugar Loaf landscape categorisation

Under the 'Landscape Assessment' of the Wicklow County Development Plan 2016 -2022, the landscape to the east and west of Kilmacanogue has been categorised as 'The Northern Hills Area' of 'Outstanding Natural Beauty'. This categorisation reflects the amenity, the views and the wildlife of the area. It is acknowledged that the proposed rezoning east of Kilmacanogue extends into the current AONB landscape categorisation however, given the need for additional lands to be zoned in Kilmacanogue, following detailed assessment any additional lands chosen has been assessed to ensure minimal impact on the amenity of the Little Sugar Loaf.

5. Special Amenity Area Order (SAAO)

The Little Sugar Loaf has no formal designation. The Ministerial order for a Special Amenity Area Order was based on boundaries that were in the then County Development Plan. An Special Amenity Area Order must be based on evidence, and when a scientific study and analysis was undertaken, the boundaries in the Ministerial Order would not have stood up to a court challenge, and alternative scientifically based boundaries were proposed, and the Special Amenity Area Order process was proceeded with, which was turned down comprehensively by the elected members in 2011. In accordance with the decision of the members during the last County Development Plan process, this objective was removed from the County Development Plan. Therefore it is not considered practical at this time to go through the process again to identify the Little Sugar Loaf as an area that will be pursued for a Special Amenity Area Order (SAAO) as there does not appear to be a consensus in favour of reinstating this objective, and therefore it is not

recommended.
No change is recommended.

Chief Executive's Recommendation

No Change

SECTION 3.6: FORMER GOLF CLUB LANDS**Chapter 10 Specific Local Objective 3**

This section of the report deals with the submissions that have been made with respect to the Bray Golf Club Lands. These lands are a Specific Local Objective 3.

No.	Name	Issues raised
C8	Ballywatrim & Wingfield Residents Association	It is noted that even after the completion of the Dargle flood relief scheme, the lands of the former Bray golf course adjacent to the river were flooded. Building development on the flood plain should be prohibited and the low lying strip of land along the north side of the Dargle should be developed as parkland and open space linking Castle Street to the harbour.
C18	Bray & District Chamber of Commerce	The Chamber supports the rapid delivery of the maximum number of good quality housing units on the former Golf Club lands. The units need to be of mixed sized and of a high quality build, Consideration would be given to blocks of apartments of 4, 5 6 storeys and greater where appropriate.
C21	Bray Retailers Group	To enable major retail floor space in the former golf club lands as stated in the Bray Town Centre Specific Objective BT2 contradicts Specific Objective BT1 and should be modified to allow for convenience retail and services serving a new residential neighbourhood only. The Specific Local Objective for the development of the golf club lands should include a restriction on development of a green area reserve on the river embankment to protect the new residential development from future flooding risks. The reserve should be part of the Dargle River linear park which increases amenity to the area. Given that residential development will have to be significantly set back to accommodate flood protection, it follows that the density should increase on the lands suitable for residential development. It will not make sense to force a height restriction, but it will be more sensible to judge every planning application on its own merits.
C66	Tim Cookson	The submitter has requested that the golf club land development includes a linear park alongside the flood defence wall to offer some attenuation in the event of overtopping.
C129	Bob Galvin	It is put forward that there <ul style="list-style-type: none"> - is no infrastructure in place at present to accommodate additional traffic on the N11; Bray is already a bottleneck with regard to traffic; - with the development of Bray Golf Club lands the existing traffic on the M50 and Dublin will be put under additional strain on the N11 not to mention to the additional traffic in the town that will be trying to get to school, train station, etc.
C164	Andrea Kennedy	The submission is in objection to the residential building on the golf club land beside the Dargle River. The submitter previously lived on the Dargle during the flooding of Hurricane Charlie and although the flood relief scheme is nearly completed, it is put forward that building houses on what is still the natural floodplain is questionable. Every winter it is waterlogged also.
C182	Martello Terrace Bray Residents Association	Martello Terrace residents recognise the need for additional residential accommodation in Bray and are largely supportive of the ideas set out in this regard in the draft Plan. While they would not object in principle to the idea of intensive building in the location of the old Golf Club, they have serious concerns about the wisdom and viability of such building development on a floodplain which no effort to date has succeeded in resolving, including the flood-defence works which have been carried out but which

		<p>have already been breached in severe conditions.</p> <p>The residents are aware of the catastrophic consequences of building on flood plains for the homes, businesses and other facilities erected on such flood plains or in their vicinity in many areas of Ireland and it is vital that Bray heeds the lessons from these experiences and not delve our town into such crises here. The expert advice available, including from An Taisce, is that large-scale building on this site should be avoided and, in the absence of convincing evidence to the contrary, it is vital that the Council exercise extreme caution in proceeding with the development of this site, though plans for a substantial parking area on it to relieve pressure on the town and seafront and the public greens place/recreation area envisaged in the draft Plan should certainly be put into motion as soon as possible.</p>
<p>C244</p>	<p>Pizarro Developments Ltd</p>	<p>Pizzaro Developments Ltd (in receivership) owns the Bray Golf Club lands and Industrial Yarns Site (21ha). Approx. 16.6ha are in Wicklow County Council (see map) and the balance is in Dún Laoghaire - Rathdown County Council.</p> <p>The lands in Dún Laoghaire - Rathdown County Council have permission for c.348 residences extant until June 2020. The subject lands in the Wicklow County Council has the benefit of a 10-year permission (granted on appeal on 3rd June 2010) for a mixed-use development of 603 residential units, 58,000sqm of retail (gross), 5,800sqm of offices and c. 12.000sq metres of ancillary uses (a cinema, bars, restaurants and community facilities).</p> <p>The proximity of the site to and its synergy with the existing town centre will be enhanced with the provision of new bridges (pedestrian and vehicular) over the River Dargle. Increased connectivity to the Dart Station and the Main Street is such that the site has the key ingredients necessary to secure the successful expansion of the town centre.</p> <p>Subsequent to the above, planning permission has been granted for a 450 pupil post primary school and a 24-class primary school (c.1,170 pupils) with playing and recreational facilities. The schools and access roads are under construction and nearing completion. A large local authority storm water attenuation tank has been also been installed. Land has also been reserved for the future development of a central access road and LUAS provisions that are mooted to link to a new bridge over the River Dargle and connect to the DART Station.</p> <p>In general, Pizarro Developments Ltd. welcomes the proposals in the Draft LAP, with the following issued raised:</p> <p>General</p> <p>The Draft LAP highlights the need for the town to become a major shopping destination for comparison goods and to attract people from surrounding towns and villages. It is essential that the new LAP supports and promotes a Bray Town Centre development that is viable and can be developed. The Golf Club development will also physically promote the viability and vitality of the existing town centre in a sequential manner. The importance of the Golf Club development for the town cannot be overstated. The development of the Golf Club lands will also help provide other strategic objectives of the Plan. It will cater for the future expansion of Luas, provide additional public transport crossings of the River Dargle and provide linkages to the Dart station, Seafront and Harbour.</p>

Residential Development

Policy R2 of the Draft Plan refers to residential development and states that it is expected that the highest density indicated for lands will be achieved. Planning permission for development that is not consistent with the principle will be refused. Table 3.1 of the Plan identifies potential for of 1,000 residential units of the Golf Club lands a minimum. It is suggested that rather than provide an absolute minimum figure for residential development that a general range be provided. This would allow for some flexibility at design stage if an amendment (or new) application was to be made.

Town Centre

Chapter 5 of the Draft Plan deals with the Town Centre. All of the existing and historic centre is zoned Town Centre (TC) *"to provide for the development and improvement of appropriate town centre uses"*.

The lands of the Former Golf Club are zoned Mixed Use (MU) *"to provide for mixed use development"*. However, the chapter discusses the Former Golf Club Lands in several references when considering the future development of the Town Centre. For example, Policy BT2 seeks to promote significant retail and commercial development in Bray Town Centre at the Florentine Centre and the Former Golf Club Lands. Yet in the preceding paragraph it is stated that Bray Town Centre consists of the land which is zoned TC. It is suggested that the language used in this section should be altered to provide greater clarity in this regard. A similar confusion persists with Policy BT3 which refers to building heights. A maximum of 3 storeys above ground is considered appropriate in the Town Centre, exceptions are possible. The permitted *"town centre development"* on the Former Golf Club lands is significantly taller than 3 storeys over ground.

While the Former Golf Club Lands are part of the Town Centre they are zoned MU not TC. It is therefore assumed that the height restriction of 3 storeys over ground does not refer to the Former Golf Club Lands. It would be impossible to achieve the densities needed to develop 1,000 residential units with a three storey over ground height restriction in place. It is suggested that policy BT3 in section 5.3 be amended to clearly state that the 3 storey over ground restriction does not apply to the former Golf Club lands.

Tourism and Recreation

Chapter 7 of the Draft Plan contains policies which refer to the Dargle River. The Golf Club lands enjoy significant frontage to the river. The permitted development proposes an enhanced river frontage with a promenade, steps from the level of the town centre down to the river, seating areas, public realm and outside spaces for cafes/restaurants.

All of the above enjoys southern aspect and would prove a major addition to the amenities of the town for use by existing and future visitors and residents. However, Section 7.3 of the Plan seeks to *"reserve lands along the river bank of not less than 10m free of all development"*. It is noted that the flood defence works to the River Dargle include the landscaping of Ravenswell Road. It is assumed that it is not intended that the amenity potential described above would be prohibited. Development (albeit limited) is needed to provide the type of recreational and leisure experience envisaged in the development of the Golf Club lands. It will be necessary to marry this with the flood defence works. The 10 metre restriction in the Draft Plan refers to the entire river. It is suggested that this should be amended for the frontage of the Golf Club lands. Again, this requires clarification in a revision to the Draft Plan.

It is noted that SLO 3 requires the provision of a public park of a minimum of 2 hectares. The location for such a park can be seen in figure below. This depicts the layout of the permitted scheme for the lands. It is considered that the permitted location represents the best location for such an amenity. The permitted park is c. 1.3 hectares in area. The provision of a 2 hectares park can only be accommodated by enlargement of the permitted in an easterly direction. This would extend to within 30 metres of the Dart line and replace c. 190 units in the permitted scheme. The requirement for a park of minimum 2 hectares impacts directly on the capacity of the lands to provide 1,000 residential units.

The permitted green infrastructure network for the lands has the following: at its centre is a park of c. 1.3 hectares; This is augmented with a pocket-park, the village green, riverside promenade and linear park/jogging track beside the Dart line. These amenities total c.2.7 hectares. In addition, there will be a community park of c.1 hectare in Dun Laoghaire Rathdown, with active play facilities.

The provision of c.3.7 hectares of public amenity on a development site of 14.48 hectares represents a large area (25%) within an urban town centre mixed use development. As a result, it is suggested that the requirement for a minimum 2 hectares park in SLO 3 be amended. The requirement should be for a park of a minimum of 1 hectare which is to be the centre of a green infrastructure for the lands.

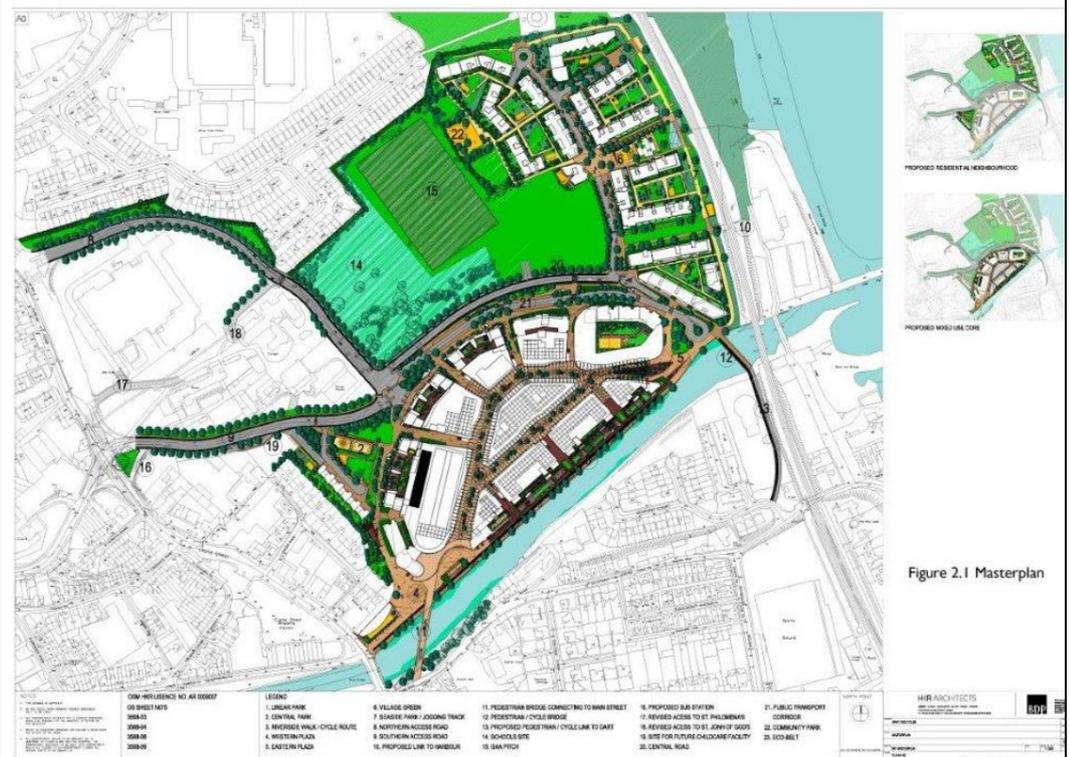


Figure 3 of submission

Infrastructure

Chapter 8 of the Plan, in Policy RO5, specifically refers to the Golf Club lands. It states: *“with respect to the major development area at the former Bray Golf Course, excellent linkages shall be provided from the site to surrounding areas, multiple access points for both vehicles and cyclists/pedestrians shall be developed and in particular, the*

development shall include linkages through the site between the Dublin Road and Bray Seafront the Dart Station and public walking routes along the river”.

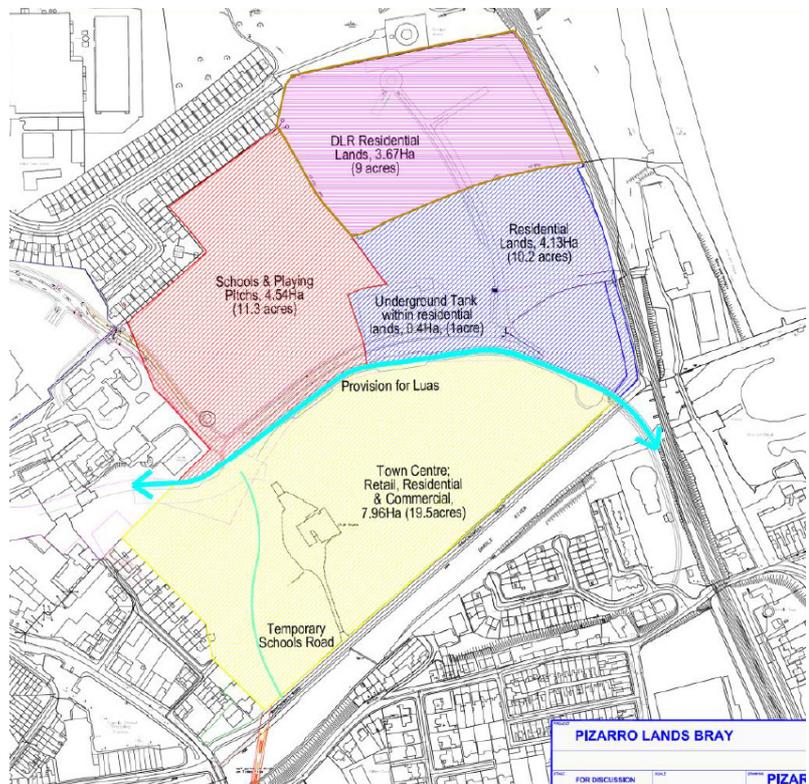
This objective is supported as it will benefit both the existing and expansion to the town centre with increased permeability and synergies. It is provided for in the existing layout/masterplan that has planning permission and will be maintained in any new masterplan for the development of the lands.

Former Golf Club Lands

Chapter 10 contains specific objectives and recommendations for several key sites in the Plan area. Specific Local objective (SLO 3) refers to the Former Golf Club Lands. SLO 3 states that MU zoned lands are c. 17 hectares in area. It is a stated objective that the lands will be developed as a mixed commercial residential, education/community facilities and open space zone. The fact that c.5 hectares have been developed to date as a school/sports zone is referenced. The 5 hectares figure would also include the area of the attenuation tank, located to the south east of the school site. As a result, c. 12 hectares of land are available for mixed-use development.

The SLO requires the provision of a 2 hectare (minimum) public park. 10 hectares is, therefore, available as a development area. The SLO then outlines what the development of the area shall contain:

- Not less than 1,000 residential units.
- Not more than 20% of car parking on open surface locations.
- Retail floor space (including retail services) of not less than 20,000sqm of which a minimum 10,000sqm of comparison retail floor space will be required.
- Non-retail floor space (offices) not less than 5,000sqm.
- The existing school/sports zone shall be retained.



Map 2 of the submission

The permitted masterplan for the development of the lands is enclosed for information. When cross-referenced with Map 2 of this submission, the location and extent of lands for a new town centre proposal becomes apparent. The masterplan indicates the location of the school with attenuation tank, open space location and also the location of 348 residential units to the north east of the lands, in the area of Dún Laoghaire - Rathdown. To the south - east corner of the lands, free standing apartment blocks close to the Harbour can be seen. These contained c. 254 residential units in blocks of a general height of 5/6 storeys with taller elements at key locations/vistas. Figure 2 indicates that the "town centre" part of the development occupied c. 8 hectares of the site. The permitted "town centre" comprised retail floor space, offices, covered streets, ancillary retail services and c. 320 apartments overhead.

Revised Masterplan

It is likely that a new masterplan will be prepared for the redevelopment of the lands. This will be used to inform the detail of any development that will be the subject of new planning applications. It is considered likely that the footprint of the "town centre/commercial" element of a new proposal will reduce. For example, a cinema is unlikely with provision of same in Florentine Centre. The new "retail experience" is now focused more on leisure with the increase in online retail sales. The quantum of retail floor space is likely to be below the previously permitted (58,000sqm) with an additional of 12,000 sqm of bars/restaurants etc. It is noted that the Draft Plan requires a minimum of 20,000 sqm of retail floorspace, to include retail services, including restaurants. In addition, the existing permission provides for 3 levels of basement parking. Such an extent of basement construction is unlikely to be economically viable. Alternative provision, such as a multi-storey carpark, will have to be considered.

All of the above will have to be assessed in a new masterplan for the lands. However, the minimum requirement for 1,000 residential units in the Draft Plan needs to be altered. The existing permission on the former Bray Town Council part of the site contained c.600 apartments. A minimum of a thousand units represents a significant intensification which will need to be carefully considered in the design of the development. It is suggested that a range or approximate figure is inserted into SLO 3. The number should not be prescriptive as this can only emerge in later stages of the design process. It is suggested that a range is included in the LAP which seeks to maximise densities, but simultaneously has regard to the provision of other amenity and infrastructural requirements. If the requirement for a 2 hectares park remains this figure will have to be reduced to a minimum of 700 units. Such a minimum figure would still allow for design development to proceed toward a figure of 1,000 taking into account all other relevant factors.

The most important and significant part of the Draft LAP that is considered to require amendment refers to the minimum provision of 1,000 residential units on the lands. This could require buildings of 8-10 stories in height. The apartments will also require several levels of basement parking. Based upon the experiences of the previous planning applications for the lands, significant additions to previously permitted building heights require detailed consideration. This part of the Plan and the SLO, along with the minimum size of the public park should be amended.

Phasing and Implementation

As above, a masterplan will be prepared for the redevelopment of the lands. This will include phases for building commercial and retail floor space, residential and car

		<p>parking provision. The Draft Plan proposal that a Phase 1 of development could include the free-standing apartment blocks and public park is welcomed. Supporting social infrastructure (crèches etc.) would also be developed. This proposal is supported and will allow for a phased and economically viable development model to be promoted.</p>
<p>C246</p>	<p>Avril Power</p>	<p>It is suggested that the remaining Bray Golf Club lands are rezoned as park land for recreational use and not allow building on the flood plain. This would enhance the sterling work already in place for the residents of Bray and Little Bray who have suffered so much damage to the property from flooding over the years. The walkway and boardwalk along the river looks amazing and if it could be extended to the seafront it would be a great asset to the town.</p>
<p>C261</p>	<p>Michelle Rogers</p>	<p>The submitter has requested that the golf club lands be developed in the form of a linear park alongside the flood defence wall to offer some attenuation in the event of overtopping.</p>
<p>C271</p>	<p>Safety With Alternative Plan (SWAP)</p>	<p>Safety with Alternative Plan (SWAP) is a Little Bray Community Group. Their concern involves the 3.5ha that lie along the north bank of the River Dargle on the old Bray Golf Club lands. All comments relate to the designation of this area and how it will impinge on the residents of Little Bray should it be zoned Mixed Use rather than Open Space for use as a linear park and playing fields.</p> <p>General</p> <p>The homes of the SWAP group are on the lowlands of Little Bray along the northern bank of the Dargle River. They lie at the foot of the Wicklow mountains, upstream of the old Bray Golf Club lands adjacent to the sea, and are therefore extremely susceptible to high tides and swollen river, as was demonstrated when the neighbourhood was completely destroyed by flooding in 1905, 1931, 1965, and again in 1986.</p> <p>The shaded area on the OPW map at Fig. 1 of this document shows the extent of the flooding throughout our neighbourhood and on the old Bray golf links.</p> <div data-bbox="722 1290 1302 1823" data-label="Image"> </div> <p><i>Figure 1 from submission</i></p> <p>Each time, the flood waters swept through the submitters houses and on to the narrow corridor of low-lying land alongside the river on the links, where they were stored until the river and sea had subsided enough to take them back again. This is the floodplain that the submitters wish to keep free of development, because its storage capacity</p>

ensures that they can, at least, begin immediately the task of trying to clean and dry and restore our damaged homes and lives after experiencing flooding.

The OPW and WCC commenced flood defences in 2012, and nearing completion. However, as is clearly acknowledged by the OPW in the 'Planning System and Flood Risk Guidelines for Planning Authorities', and in our own Bray Municipal District LAP 2017, flood defences can fail.

- The Golf Course lands were flooded inside the flood defences on the 29th October 2015 when one of the non-return valves that are supposed to allow water off the land inside the defences, but close when water attempts to enter from the river side, failed. A series of particularly high tides pushed the river through this faulty valve and onto the flood plain.

- The Golf Course lands were flooded inside the flood defences on 20th August, 2016, the flood defences failed again, creating what was like a mirror image of the river inside the defences, on the floodplain.

If they fail upriver from the SWAP homes, the defences will actually work against them, as the flood water will be trapped on our side of the walls – and, if flooding can no longer travel downriver onto the old Bray golf links, then it will remain in the homes.

The Floodplain & Zoning

A floodplain is defined as a low-lying area of land, prone to flooding, adjacent to a river or stream. That is a perfect description of our floodplain. All of the golf club lands within Bray's municipal boundaries were zoned as Z33 'for the preservation of private open space' until the 1999 Development Plan when they became Mixed Use '*to provide for mixed use development in accordance with the Bray Golf Club Lands Action Plan*'. Point 2.1 of the report states '*Part of this land (c3.5 ha or 8.6 acres) is low lying and is regarded as flood plain.*'

In 2005 that Action Plan had been shelved, the Development Plan was prepared in-house, and the Mixed Use zoning had been sub-divided into three further zones:-Zone 1: Town Centre (16.5 acres); Zone 2: Open Space & Community (16.5 acres); and Zone 3: Residential (8 acres). The floodplain of 8.6 acres (3.5 ha) fell within Zone 1. It had now gone from Open Space (1993) through Mixed Use (1999) to Town Centre (2005). The councillors said that they had agreed to zone it in this way because they had been told that the State would not provide flood defences, despite all best efforts, but that Pizarro Developments would pay for them instead, if they were allowed to build on the low land, beside the river. Nine weeks after the Development Plan had been passed, Pizarro Developments submitted elaborate plans for what was highly publicised as a €2.2 billion development, including high density building on our floodplain. In 2010, a 10 year permission was granted that including a culvert through their two-storey basement car-park, to allow any future flooding to escape. The entrance to the culvert measured approximately 8m high by 10m wide - it replaced an 8.6 acre floodplain.

Bray flood defences have been paid for by the State, without a single cent from Pizarro. The Town Centre zoning on the floodplain was voted through on the basis of misinformation.

Pizarro is in receivership but the planning permission still remains. SWAP are, separately, appealing to the Minister for Finance, the Minister for the OPW & Flood

Relief and the Minister for Housing, Planning & Local Government, to work with Wicklow County Council in buying back the 3.5ha floodplain from the receiver so that planning permission cannot go ahead and the floodplain is still valid. This makes economic sense. The biggest benefactor of any monies received for this land will be NAMA and the taxpayer. Any damage from future flooding here will come out of the tax-payer pockets. If the 3.5ha floodplain is turned into a linear park and playing fields, it will extend the People's Park down to the harbour. The remainder of Pizarro's 17ha site can be sold at a profit.

'At least 2 hectares' are already allocated for a park in the Draft LAP, provided Pizarro's permission is not taken up, only a further 1.5ha are needed to make this possible. If housing is planned on this overall site (provided the extant permission is not taken up) at a rate of 100 units per hectare, about 150 housing units will be lost on a floodplain, out of a total of 1000. These 150 units could be moved up to the Fassaroe area.

According to Bray Retailers' submission, retail density proposed for this site is too high. If this is pulled back to a more reasonable level, it will leave more space for housing units on the high ground. This makes sense. The Florentine Centre at the heart of the real Town Centre, has remained derelict, killing our town, for too many years. The Florentine project could truly regenerate Bray, but it will not happen while the threat of a huge shopping development on the other side of the river hangs over it.

If the floodplain were to be returned from Mixed Use to its original, safe Open Space zoning in the 2017 LAP for Bray by Wicklow County Council, it would:

- a) protect the floodplain from future development, provided it is not sold with the present planning permission intact;
- b) send out a clear message to our Government that Wicklow County Council want our floodplain retained in this way for the safety of its people; and
- c) send out a message also that this County knows how to recognise and rectify mistakes made in the past in all good faith. Today we have too much knowledge of flooding, floodplains, and climate change to be ignorant of its consequences.

The zoning should, as per the OPW's clear Guidelines, protect floodplains from development, even with flood defences in place. The only way this prohibition can be avoided is if the site passes the Justification Test.

The Justification Test and the old Bray Golf Club lands

Site B4 (a) of the Strategic Flood Risk Assessment for the draft LAP covers the old golf links and it passes the Justification Test according to the draft LAP, allowing building on the floodplain, while B4 (b) fails it, although it is clearly flagged in the 'Recommendation' at the end that the lands at Rehills are also being considered as a possible site for development in the future. The 'Recommendation' for B4 (a), the old golf links, is simply 'No further action required'. This is the map, we were told, against which the plan for the golf club lands was assessed, and on which the Justification Test was carried out.

This extension of the Flood Zone on the old golf club lands from the narrow corridor of land next to the river shown in previous maps, including those of the OPW and previous Development Plans for Bray, does two things:

- a) it purports to enable the Justification Test to be passed because the area involved would be so large as to answer the two crucial questions in the

Justification Test with a 'Yes'. We contend this is spurious. These questions are: whether this land 'is essential to facilitate regeneration and/or expansion of the centre of the urban settlement', and whether 'there are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement' .

- b) this interpretation of the Test places almost all of any future development on this land – including the high ground – at risk of being considered uninsurable. Insurance companies, as we know from bitter experience, will not insure houses built on lands at risk of flooding, with or without flood defences.

How did the floodplain grow to this extent between the 2011 Plan for Bray and this 2017 Draft LAP, especially when flood defences costing over €40m were installed during the same period?

Our floodplain – mapped

The Justification Test fails miserably when applied to what has always been recognised, and experienced, as a floodplain on these lands. Some 3.5ha of land, with two already designated for a public park, is obviously unnecessary 'to facilitate regeneration and/or expansion of the centre of the urban settlement' - and there has always been a clear alternative to building on this low ground.

To be clear which area of the old golf links that is referred to as the floodplain, it can be seen from photograph and videoed evidence (attached to submission):

1. the final scene of the RTE news clip at showing the golf links the morning after the 1986 flood;
2. photos of the same area in October 2015 and in August 2016 when non-return valves in the new flood defences failed;
3. the OPW map taken from floodmaps.ie;
4. a later Ordinance Survey map - Map 16 in the 2011 Development Plan for Bray; and
5. Map No. C4 taken from the Draft LAP 2017, just published.

On all of these, the extent and the configuration of the floodplain is exactly the same: the flood line conforms to the contours of the land, with flooding occurring on the low land next to the river, below the old golf club house and the parallel line of trees that mark the beginning of the rising ground.

As already stated, the map, we were told, against which the plan for the golf club lands was assessed, and on which the Justification Test was carried out is Map SFRA 1. This is augmented by Map SFRA2 (a) on the following page of the LAP. Both produced by Wicklow, they show a flood zone area that has grown by about two-thirds from all previous flood maps for this land. Yet, the only significant event that has occurred since the 2011 Development Plan has been the installation of flood defences.

The only justification that can be found for this sudden extension of the flood zone on these lands are Maps no. C6 and, perhaps, Maps C1 and C9.

Map no. C6 shows potential river and tidal flooding whose extent is replicated in SFRA 1: it extends the flood zone right up onto the high ground of the old golf links. According to its source it is a map drawn in 2007 (as part of the Wallingford study for the River Dargle Flood Defence scheme) showing potential river and tidal flooding if no flood defences were put in place.

Map no. C7 shows where the Wallingford study people believed potential flooding is likely to occur in a post- flood defence scenario. It shows no flooding at all on the old golf course lands, a projection we now know to be too optimistic with these lands flooding in August and October 2016, when escape valves in the flood defences failed.

The large scale of **Map no. C1** makes it very difficult to read clearly. It does however seem to show quite extensive coastal flooding on the golf club lands. The sources quoted for this map are a) the OPW Preliminary Flood Risk Assessment; and b) the National Coastal Protection Strategy Study. With regard to the first source, it is, as its title states, merely a preliminary assessment. We would agree with the statement from the planning section of Wicklow County Council that: 'The OPW would be happy to say that the PFRAs are quite 'unreliable' as an indicator of flood risk, having been created by a computer model without any actual site survey work'.

The second source quoted for Map no. C1 is the National Coastal Protection Strategy Study. This Coastal Flooding prediction map was drawn in May 2009, three years before the flood defences were put in place, so it is again predicting the level of flooding that might occur without flood defences.

Map C9 also matches SFRA 1, but only for coastal flooding and for the Newcourt Stream. The coastal flooding is shown as Flood Zone A (high probability of flooding), and the Newcourt Stream as Flood Zone B (moderate probability of flooding). Map C9's source is CFRAM mapping July 2016.

CFRAMs July 2016 UoM 10 (Unit of Management 10) Flood Risk Plan, covering Avoca-Vartry actually shows Newcourt Stream as Low Risk (not moderate), but, more importantly to us, like **Map C9** it describes no flood risk on the golf club lands at all – because, say CFRAM, it is impossible to carry out a flood risk assessment while flood defences are still being put in place. If the OPW's CFRAM, their expert section on flood risk management, cannot proceed to the next stage of flood risk assessment on the River Dargle, how can Wicklow County Council have carried out such an assessment reliably?

So, **Maps C1 and C6** are based on potential future flooding if no flood defences were put in place, along with the agreed unreliable preliminary flood risk assessment; **Map C7** is based on potential future flooding if flood defences are put in place and shows no flooding at all; and **Map C9** underlines the fact that CFRAM feels a reliable flood risk assessment cannot be carried out on these lands yet. That leaves:

- **Map C2** which shows contours (unfortunately not at a small enough of a scale to demonstrate the sudden rise in land from the floodplain alongside our river up past the old club house and parallel line of trees), and alluvial soil. Alluvial soil is defined as 'a fine-grained fertile soil deposited by water flowing over flood plains or in river beds'. Not surprisingly, the low lands on the old golf links are shown as alluvial soil, not the high ground.
- **Map C3** shows only 6" mapping, and is of no relevance to flooding.
- **Map C4**, on the other hand, is taken from the OPW's floodmaps.ie and shows flood events. Again it corresponds with the low lands of the old golf links.
- **Map C5**, while again taken from www.floodmaps.ie, merely indicates 'flood events', without mapping them. Strangely, it only refers to the great floods of 1905 and 1986 on the golf links, ignoring the well-documented and disastrous floods of 1931 and 1965, as well as the smaller floods in between. These multiple floods in Bray are however now documented in CFRAM's UoM 10 (Unit

of Management 10) Flood Risk Plan quoted above, and:

- **Map C8** shows only the Post-Scheme flood scenario at the Slang, upriver at the opposite end of our neighbourhood, so is not relevant to the floodplain on the old golf links. It is however an extremely important area in terms of flooding as it is where the river has broken its banks – as well as over-topping the river walls in all of the major floods mentioned above.

Therefore, out of a suite of nine maps contained in the Draft Plan, and used as a basis for Map SFRA 1 on which the Justification Test was carried out, all of the factual maps – as opposed to potential, future flooding if no flood defences were put in place – point to the corridor of low-lying land alongside the river on the old Bray Golf Club lands as the floodplain most in need of protection.

While we fully support the OPW's directive that flood defences should be ignored when zoning land, it is simply not logical to base Map SFRA 1 (and, consequently, the Justification Test) on Maps C1, C6, or C9, when there is very clear evidence that this Justification Test should be applied instead to the floodplain that has acted as an escape route from our homes for floods for over 100 years now.

Apart from the risk to homes if this escape route is blocked, is it not obvious that if the low ground alongside the river is built on, the flood waters from the next flood event that occurs here will rise quicker to the high ground? And the high ground is now home to two schools, as well as a possible home to some 1,000 housing units and many businesses.

Insurance

By extending the flood zone area on these very flimsy grounds Wicklow County Council is also almost certainly ensuring that none of these future homes or businesses will get insurance, a situation that may well extend to the schools. This flood zone map, as drawn, is not only illogical in our opinion, but it is also an insurance company's dream, as house insurance is being refused already to those of us who have at any stage been flooded, even with flood defenses in place.

The only thing that extending the recognised floodplain on these lands up from the lowlands to cover most of the site achieves is that it will allow it to pass the Justification Test, and so allow building on the real floodplain.

This floodplain needs to be rezoned now, in order to protect us now and in the future. If the old Bray Golf Club lands are sold with the present planning permission in place the new owner can go ahead and build according to that permission. He or she cannot however change that permission without reapplying - when we will again challenge it. What can happen, however - as has happened in the past is that the new owner could 'take up the permission' and put in foundations and then apply for a change in planning permission. Then, no matter how much we object, our floodplain is destroyed forever, and we are at grave risk.

The only way to show any prospective developer that there is no point in doing this is to rezone the floodplain now.

Acceptable Risk

There is no such thing as 'an acceptable risk' when it comes to a very vulnerable

community such as Little Bray. Ravenswell Row, Maitland Street, Ardee Street were all either built or adapted by our Council for the elderly and disabled, and they have all been consistently flooded over the years. 'Villa Marie' also flooded, was a family home then, it is now a residential home for around eight adults, most of them non-verbal, and many of them in wheelchairs with a variety of physical and intellectual disabilities. In the Printworks apartments, at roughly the same distance from the river, young people with much milder special needs live 'independently', with the support of Sunbeam Services. In addition, there are many other elderly and/or disabled people scattered throughout our neighbourhood, either in one-storey houses, or in 2-storey houses with stairs that they can no longer climb. All of them live at the heart of the floodplain on which our houses are built, and all of them would be both terrorised and very limited in their capacity to help themselves if the flood waters ever come again.

At the other end of the scale, we have many new residents in our neighbourhood who have young families, as a result of which two crèches have been established among us, one small and one large, attended by approximately 200 small children.

If planning, and the assessment of flood risk, is about anything, surely it must be about protecting people like these from future harm.

Summary

We submit that the area of the old Bray Golf Club lands that needs to be preserved free of development is the 3.5 ha corridor of low-lying land alongside the river, and that this is the area to which the Justification Test should be applied.

This area should be rezoned as Open Space and developed as a linear park and playing pitches, thus keeping the floodplain free as a safety valve against the real danger of breaches of the defences upriver.

We submit that the remainder of the old Bray Golf Club land site, the 13.5 ha of high ground, is perfectly suitable for development. The only evidence presented to the contrary are maps showing possible flooding should flood defences not be put in place. All other 'evidence' presented is premised on a flood risk assessment carried out by Wicklow County Council that CFRAM say they cannot carry out yet as it would be unreliable.

Furthermore we submit that should the low-lying land alongside the river be built on, the 'possible flooding' scenario described in these maps is much more likely to occur, as the maps show the tidal flooding coming from the river, across the low lying land, not from across the railway line from the sea. The low land adjacent to the river forms a ditch or 'moat' between the river and the high ground, if this is filled in, flooding (both tidal and river) will naturally reach the high ground quicker, where there is already two new schools.

In addition, it is submitted that any development built on the low proven floodplain, will find it impossible to get insurance, whether for home or business. By extending the flood zone, by a 'possible', 'in the future', 'if we don't get flood defences' scenario, to the high ground, it will provide insurance companies with evidence to refuse insurance to the development on almost the entire site.

Finally, it is submitted that our community, with its very vulnerable residents, needs a

'belt and braces' approach to flood protection.

This 3.5ha of low-lying land adjacent to the river is not necessary to the regeneration of Bray, and there is a clear alternative to building on it. It is, however, vital to the future development and safety of our neighbourhood because we have no such alternative.

Opinion of Chief Executive

Flooding - Development Plan Justification Test

The former golf club lands being zoned 'Mixed Use' under the Flood Zones A and B pass the 'Development Plan Justification Test' as set out in the 'Planning System and Flood Risk Management Guidelines' (2009).

The guidelines set out that *"it is recognised that the existing urban structure of the country contains many well established cities and urban centres, which will continue to be at risk of flooding. At the same time such centres may also have been targeted for growth in the National Spatial Strategy, regional planning guidelines and the various city and county development plans taking account of historical patterns of development and their national and strategic value. In addition, development plans have identified various strategically located urban centres and particularly ...town centre areas whose continued growth and development is being encouraged in order to bring about compact and sustainable urban development and more balanced regional development. Furthermore, development plan guidelines, have underlined the importance of **compact and sequential development of urban areas** with a **focus on town and city centre locations for major retailing and higher residential densities**".* (Section 3.7) As set out in the Strategic Flood Risk Assessment of the draft Bray LAP, these lands at the former golf club fulfil all of the criteria of the justification Test for development plans.

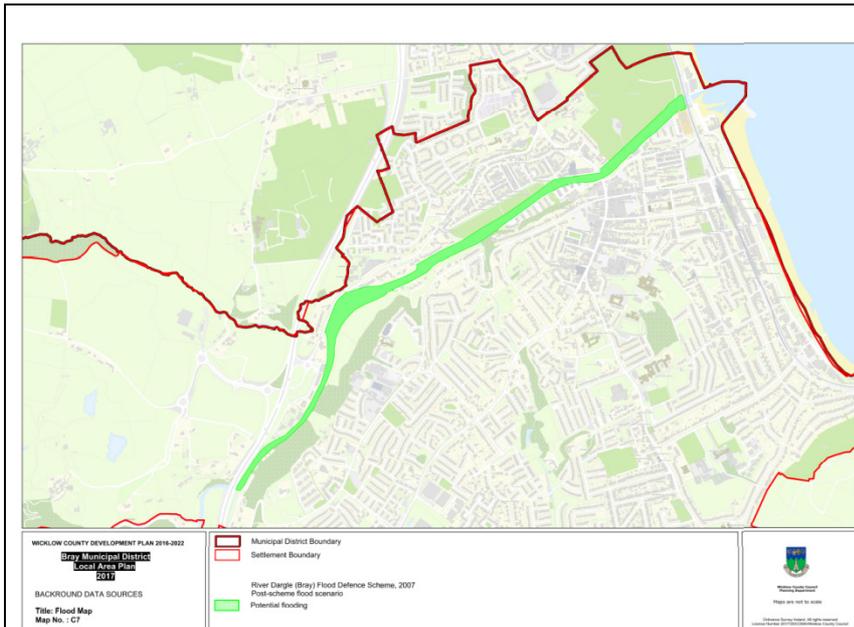
Flood Zones at the Former Golf Club Lands

Maps C1 to C9 of the Strategic Flood Risk Assessment (SFRA) of the draft LAP present all of the mapped background information sources that were assessed as part of the flood risk assessment. The OPW's Preliminary Flood Risk Assessment (PFRA) maps, Catchment Flood Risk Assessment and Management (CFRAM) mapping and the National Coastal Protection Strategy Study Mapping are all key information resources in this assessment. There is no CFRAM mapping of the Dargle River at the golf club lands as the OPW has not undertaken such a study given that the river is the subject of the River Dargle (Bray) Flood Defence Scheme (2007). This Flood Defence Scheme is a significant source of information for the SFRA with the pre-scheme flood scenario and post-scheme flood scenario mapped.

The Flood Risk guidelines state that *"The provision of flood protection measures in appropriate locations, such as in or adjacent to town centres, can significantly reduce flood risk. However, the presence of flood protection structures should be ignored in determining flood zones"* (Section 2.25); hence the flood zones for Bray present the pre and post scheme flood scenario for these lands.

Following on from this the Guidelines state *"The likelihood and extent of this residual risk needs to be considered, together with the potential impact on proposed uses, at both development plan and development management stages, as well as in emergency planning and applying the other requirements of these Guidelines in chapter 3. In particular, the finished floor levels within protected zones will need to take account of both urban design considerations and the residual risk remaining."* With regard to the residual risks post scheme, the Environmental Impact Statement of the River Dargle Flood Defence Scheme (July 2007) states that (under the heading of 'Residual Risks' Section 5.1.6), *"The proposed measures will have a positive long-term impact on the area immediately adjoining the River Dargle in that they will protect all adjoining lands and properties from flooding and substantially reduce the risk to life and property during a flooding event. This impact is considered to be a significant positive and permanent impact on Human Beings."*

The scheme has been designed to protect against the Flood Zone A (1:100 fluvial and 1:200 Coastal). Therefore map C7 with the post scheme flood scenario (see map here) is imperative in flood risk assessment at the development management of any planning application assessment stage given that it presents the flood zones with the scheme in place.



It is acknowledged that there has been flooding of these lands during the construction of the flood defence scheme. It is important to note here that the scheme was under construction and that this cannot be seen as a reflection of the post- scheme scenario as the scheme has to be fully completed in order to achieve the post-scheme flood scenario.

In October 2015, the golf club lands flooded from 26th to 28th Oct 2015 (during a combination of high astronomical tides and heavy rainfall) due to the failure of the Contractor who was carrying out work on the surface water outfall drainage on Ravenswell to properly install a tidal flap valve at that time. The flap valve was correctly fitted on 29th October and no further flooding of the area due to fluvial/tidal ingress occurred.

In August 2016, following a period of heavy rainfall on Sat 20th August 2016 the golf course became waterlogged as recent work carried out by the schools contractor prevented the rainwater from entering the surface water drainage system installed as part of the Flood Defence Scheme. On 23rd August the schools contractor uncovered the land drains that were covered by the recent roadworks and the excess water drained away as designed.

Insurance and flooding

This is not a matter for a land use plan. The purpose of the SFRA is to inform zoning decisions, not to say that land definitively does or doesn't flood – the maps created are used to test the robustness of zoning, nothing else.

Mixed Use Zoning

The mixed use zoning is considered appropriate for the former Golf Club lands. It is an objective of the draft LAP that this land be developed as a mixed commercial, residential, education / community facilities and open space zone with a masterplan prepared and agreed prior to the submission of a planning application.

Retail allocation

The priority in terms of additional retail floorspace is the traditional centre / core of Bray – i.e. along the Main Street. The Council is committed for example to developing the Florentine site as a major shopping and lifestyle destination at the heart of the Main Street, which will potentially bring new vibrancy to the area and attract further retailers and commercial / cultural activities. However, one must bear in mind that there is limited land, even brownfield, in the centre of Bray and in order to ensure that significant new retail and commercial activity can occur, sites at the 'edge' of the centre must be considered. This is of course preferable to the alternative, which are 'out of centre' locations. There is an obvious site for such development – the former golf course, and this has been designated in a number of development plans as the focus for new town centre development in

Bray.

The Council is committed to ensuring that any development that occurs on these lands forms a natural extension to the traditional retail area and that there are well developed connections between the two areas, to ensure synergy and spin off benefit from one to the other.

In addition, with the protection of the traditional town centre in mind, this plan provides for a reduced level of retail / commercial development on the golf club lands compared to previous plans / permissions. However, the reduction has been made on the basis of reassessing what is required to restore Bray to a significant retail centre. The Florentine Centre, while of tremendous importance, will not in itself restore the status of Bray. Without further retail potential, Bray will be a poor relation to the likes of Cherrywood and other M50 shopping areas.

Town Centre designation

The golf club lands are zoned 'mixed use' to reflect the fact that a range of uses are required. It is desired that the development closest of the traditional town centre, along Castle Street and along the river frontage will be developed as an 'extension' to the established town centre and this is why there are references to this area in sections of the plan dealing with the development of the 'town centre.' A slight wording change in BT2 will clarify this.

With respect to the building height objective quoted, this was crafted with the 'town centre' zoned lands in mind specifically, to reflect the traditional 2-3 storey appearance of the area. In this regard therefore it is recommended that this objective be amended to bring additional clarity.

Height restrictions

No height restriction are indicated for the development on the golf club lands and in order to achieve the high densities targeted, it is expected that higher buildings of 4 storeys + will be considered.

Recreation

The plan includes an objective that the area within 10m of a watercourse be maintained free of development and in a natural condition, in the interests of maintaining the ecological or environmental quality of the watercourse and / or to ensure access for channel clearing / maintenance / vegetation. This provision clearly is not applicable where the riverbank is already 'developed' such as along the edge of the River Dargle in the town centre, where manmade river walls are in situ.

With respect to the golf club lands specifically, Ravenswell Road is located in the area within 10m of the river and any new development on the former golf course will be north of this behind the flood wall, so it would be well in excess of 10m from the river edge. This provision will not affect the development and landscaping of Ravenswell Road, which already has consent.

In terms of development along the riverside frontage of the golf club lands, this will be a matter for the proponents / designers of any future scheme.

The draft LAP does not prescribe where the future park should be located, and this is deemed to be an exercise that should be conducted through the master planning process.

Open Space zoning (linear park) along the river

The draft plan does not specify where the required OS of 2ha should be located and it is recommended to amend the plan to state that the 2ha can be delivered in 1 or more parks/areas; depending on the design concepts that emerge (should the current permission not be developed) it is possible that the public open space or a portion of the open space could be located along the river. However, this must be balanced with providing an optimal design that correct excellently with the existing town centre, both functionally and visually, and providing for the highest form of design and amenity for the town and future residents of the area. This could involve the provision of a riverside frontage, including active uses such as shops and cafes overlooking the river.

The flooding issues raised with regard to this area along the river have been addressed under the flooding response above. This land passes the flood risk development plan justification test and will be defended from the 1:100 year flood event, upon completion of the flood defence scheme.

Residential Allocation

The draft LAP seeks the provision of not less than 1,000 units on the lands should a new permission be sought for these lands under the new LAP. Given the location of these lands adjacent to the existing town centre, train station, schools, local amenities, etc it is considered vital that these lands achieves the maximum density possible. It is noted that these lands have a current permission with c.600 units permitted therefore it is recommended that the plan is amended to seek the target provision of 1,000 units as opposed to a minimum of 1,000 units.

The plan targets an overall development of c. 130,000sqm on 10ha of land – c. 30,000sqm retail / commercial and 100,000sqm residential. This is the equivalent of 13,000sqm of development per ha. On the basis on a 4 storey average height across the site, this equates to building footprints c. 3,250sqm per ha i.e. the buildings would only cover 32.5% of the land. The remaining land would be necessary for roads, squares, open spaces, car parking etc. This is considered achievable.

Even if one were to factor in car parking at a rate of 1,000 for the retail / commercial uses and 1 space to residential unit and allowed for up to 50% of such spaces to be 'surface' spaces, this would only have a land take of another 30%, still leaving more than third of the land for roads, open spaces etc

Traffic and impact on N11

The Council is committed to improving accessibility in Bray and environs and to this end is working closely with the various transport agencies, such as NTA and TII, to address traffic issues. A 'Bray and Environs Transport Study' is nearing completion, as this will identify the measures that will be required in terms of roads, footpaths cycleways, and public transport that will be needed in the short, medium and long term to serve the development that this plan targets, for example the development of the golf club.

The concerns in relation to the increased traffic on the N11 from the increased residential development are noted; however, this plan has been crafted with a sustainable development vision in place where it is envisaged that Bray will be a self sufficient settlement with people having the option to work and attend school within the settlement minimising the need for long commutes to Dublin for employment. Further to this, the golf course lands are within walking distance to the existing DART/ train station, existing public bus stops and they are a short distance from the proposed LUAS stop at Woodbrook/ Shanganagh.

Furthermore, the TII has recently carried out a detailed assessment of the N/M11, having regard to existing and future traffic flows predicted (factoring in the planned growth of Bray) and it has outlined what improvement to the national road will be required. The TII is committed to delivering significant improvements to this route.

The submission from Bray & District Chamber of Commerce is noted.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 2, as detailed in Part II of this report (p17)

This section of the report addresses the remaining issues raised, that are not addressed in Sections 3.3, 3.4, 3.5, and 3.6 preceding. This section addresses topics in the order that they appear in the plan.

Section 3.7: OVERALL STRATEGY

Sub No.	Issues raised
<p>C18 Bray & District Chamber of Commerce</p>	<p>The Chamber welcomes the preparation of an LAP and agrees with the vision and sentiment set out in the Chapter 1 and Chapter 2 of the document. To avoid the plan being simply aspirational rather than achievable it is desirable that there be a regular six monthly or annual review mechanism within Wicklow County Council to ensure that the plan is being actioned.</p>
<p>C21 Bray Retailers Group</p>	<p>Bray is well positioned to benefit from the continued growth of the Dublin Metropolitan Region. Significantly more housing projects should be expedited given that the shortage in supply will last for the implementation period of the Local Area Plan. The changes in the European Union with the forthcoming exit of the UK could stimulate new demand for commercial space from companies requiring launch pads into Europe. Bray should stake its claim as a favourable option given its location close to the capital as the gateway, its relative affordable cost of living and the pro-business environment facilitated locally and nationally.</p> <p>It is also clear that in the European Union sustainable urban development is a policy priority. This is evident from the New Urban Agenda of the European Union, also known as the Pact of Amsterdam, adopted in June 2016. 'Urban areas' with a population of 50,000 and upwards will become the focus for funding of urban innovation ranging from mobility solutions to smart city initiatives. The Bray Retailers Group urges that serious consideration be given to increase the population in the Municipal District from 35,000 in 2016 to reach 50,000 by 2026. This will require higher densities than suggested in the Wicklow Development Plan and the draft Local Area Plan.</p>
<p>C33 C. Burrell</p>	<p>This draft LAP is the most important document for Bray as it will influence all decisions on planning, transport, environment, recreation & amenities, employment, industry & business, water, waste, lighting, infrastructure etc. in the Bray and surrounding areas (including proposals for Kilruddery Demesne) for the next six years or more as well as creating long term impacts which cannot be reversed if not carried out in long-term joined-up sustainable methods.</p> <p>It should be noted and stated to the public that this Plan, is in reality, an aspirational one with strategies and objectives listed that may not actually be implemented. A section of this current draft Bray LAP should include an Appendix and list what was been achieved and implemented since the last adopted Bray LAP 2011-2017.</p> <p>It should also be noted that in relation to proposed population projections/targets that these are only projections/targets and may not be achieved. Nevertheless, contingency and strategies should be put in place to ensure provisions required are met but not over-estimated (by over zoning land such as proposed at Kilruddery) as other documents and guidelines have acknowledged:</p> <p><i>"In this uncertain context, it is considered appropriate at this stage that the plan shall put in place a structure to meet the short term 6 year target only, with 2 years 'headroom'. 'Headroom' or 'market factor' which is 'extra' land that is zoned over and above the minimum amount needed to accommodate the 2023 population target."</i></p>

	<p>According to the Regional Planning Guidelines for the Greater Dublin Area, more houses are usually constructed than needed to cater for the increase in households. This is called the Excess Factor. The Guidelines state that there has been an excess factor of 16.8 per cent in the Mid-East Region in the period 1996 to 2002, and predict that the excess factor will be approximately 13 per cent by 2020.</p>
<p>C116 A. Endrizzi</p>	<p>Any zoning which expands the built-up area in general, to land which has not been built on, or to land which does not have zoning for construction, should be removed</p>
<p>C118 A. Ffrench</p>	<p>It's clear from the Preamble to the Draft Plan that its working assumption - by both regional and local planning authority (Wicklow County Council) – is growth as per usual, aligned to planning as per usual; without any fundamental questioning of the underlying premise of accepting unrestrained urbanisation within the south-Dublin / north Leinster corridor. The Draft Plan does recognise the environmental and spatial constraints imposed by the natural geography, landscapes and seascapes of the Bray area. However, it proceeds with an acceptance of growth, without seemingly exploring any spatial and land-use alternatives within the wider county or region. Apart that is from putting most its 'eggs' in the one basket of Fassaroe Masterplan, without consideration of wider effects and linkages in DLR (e.g. Old Conna, Woodbrook-Shanganagh, Cherrywood SDZ, Glenamuck-Kiltiernan, etc.)</p> <p>In the changing world of Climate Change and the need for tightly-grained urban form combined with Blue-Green Infrastructure, this business-as-usual planning approach is not longer tenable [4], [5]. The conventional response growth - ongoing expansion within and near the same spatial location(s) and limits is something of a straight-jacket that is locking-in existing deficiencies, constraints and deficits in Bray. The latter include poor quality and limited Green Infrastructure for Action and Passive Recreation, Leisure and Sports; natural accessible green space; impositions on vulnerable natural assets (e.g. Swan River undeveloped Blue-Greenway, Dargle River at Rehills/La Vallée; Bray Harbour and Cliffs undeveloped, lying derelict)</p> <p>All this, begs the question of the planning authority, its neighbours and the Regional Assembly of the need for radical re-think and review – philosophy and practically – of current and conventional practice and policy in Ireland, not least in intensely-urbanising such as north Wicklow. In that context, it would appear that the Regional Planning Guidelines (RPGs) have imposed on WCC and the citizens of Bray, an unjustly excessive allocation the 'burden' of projected population growth, with consequent demands and needs in housing social and Blue-Infrastructure, transport, water and drainage infrastructure and facilities.</p> <p>An alternative approach might encompass some of the following:</p> <ul style="list-style-type: none"> ▪ Accelerated provision of Public Transport ▪ Concentration of population growth in other existing, small settlements with a focus on mixed-used (commercial, retail, residential, leisure) higher density and high-rise (5 storey plus) within core towns and villages ▪ Imaginative and dynamic mixed-used re-generation of abandoned and derelict sites ▪ Changing from blanket industrial-employment land-use zonings in Bray Town Centre to mixed-use ▪ Re-zoning lands to high-density, low-car dependency, mixed-unit types and tenures. ▪ Examine alternatives sites in the Kilmacanogue – Kilpeddar M11 corridor and in within the Greystones – Delgany and Charlesland areas, <p>It is unclear if any of the above analysis, iterations or alternatives planning solutions were explored</p>

Opinion of Chief Executive

Plan premise

It is correct that there is no questioning in this LAP of the *'underlying premise of accepting unrestrained urbanisation within the south-Dublin / north Leinster corridor'*. In accordance with the Planning laws, and the 'nested' planning regime in the country, the Wicklow County Development Plan and this Bray MD LAP which is subsidiary to it, must be consistent with national and regional planning strategies and policies. It is not within the remit of a LAP to alter or question plans 'above' it.

This is an issue that the submitter might take up by way of submission to the new National Planning Framework and Regional Plan.

It is not agreed that the current development strategies based around development occurring principally in or adjoining existing built up areas has the inevitable effect of 'locking-in existing deficiencies, constraints and deficits'; on the contrary, development of existing built up areas where services are already located allows for maximum return on investment and economies of scale. It means people will live where services are already in situ, rather than in newly developed housing areas without basics such as public transport, shops or schools, which normally only 'arrive' after a certain population is in place. What is essential however is ongoing investment in existing built up areas to service both existing resident and new residents.

With respect to the concern that this planning model results in poor quality or limited open space and green infrastructure, the open space and GI provisions in this plan, are in fact very generous and a lot of effort has been put into adding 'depth' to the plan such that it is not just about development but also about protecting and enhancing valued built and natural assets. The open space provisions of the LAP are crafted on the basis of the Council 'play policy' which provides that 2.4ha of open space should be provided per 1,000 population. Having regard to the population target for the plan area (c. 45,000), this would equate to a need for c. 108ha of open space. In total the draft plan provides for 164ha²⁵ of open space. Furthermore, this figure does not include other significant recreational areas such Bray Head, the Great and Little Sugarloafs, the grounds of Kilruddery, Knocksink Wood in Enniskerry, the Powerscourt Estate or the various Golf Clubs in the area. In these regards, it is considered that ample and significant provisions have been made for open space and recreation in the plan.

With respect to the 'alternative approach' suggested:

- While the Council is not a public transport provider, in the objectives of this plan and in its close cooperation with the transport agencies (TII / NTA) the Council aims to ensure that significant improvements to public transport occurs in Bray. Bray centre already has excellent public transport service and all efforts have been made to designate sites for new development in proximity to such services. The designation of Fassaroe as a major development zone is strictly on the basis of the delivery of public transport services to the area;
- It is not accepted that development should instead be directed to 'smaller settlements' which inevitably have a much lower level of services and much worse public transport given the lower population catchment
- The plan does indeed focus on more intensive development in the town 'cores', and regeneration of underutilised and derelict sites but it is not agreed that high density, high height development is suitable in villages as suggested
- There are no 'blanket' industrial zonings in Bray centre. There are lands zoned for only employment use around the periphery and in suitable location, a wider mix of uses on such sites has been facilitated by this plan.

²⁵ It is accepted that this includes 65ha OS2 ('passive' open space) that is not necessarily intended for active recreational use, but substantial parts of which still provide for outdoor amenity space (such as river banks, forests, etc).

- The plan does facilitate high density, mixed unit type developments, with particular regard to both the provisions and objectives of this plan and the County Development Plan.
- It is suggested that rather than further development in Bray consideration should be given to more development in Greystones – Delgany - Charlesland and the Kilmacanogue – Kilpedder M11 corridor. With respect to G-D-C, significant development is already planned for these areas, and it is not agreed that the K – K 'corridor' is a viable development alternative (lack of services, car based transport based etc)
- With regard to the planning 'alternatives' considered for this plan, these are all described in the Strategic Environmental Assessment

Role of the plan

It is not considered correct to characterise the plan as 'aspirational'. It is clearly stated in the introduction to the plan that:

".. this Local Area Plan shall only include objectives that are area specific and achievable, and avoid those that are aspirational or are best dealt with in the annual budget, road works programme, etc. The role of land use plan is to put in place a framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan".

Careful consideration has been put into ensuring the objectives are implementable, and the Council will utilise the resources available to implement element of the development strategy that are within its power. It is recommended that additional text is included in the plan outlining in more detail the proposed implementation strategy.

Role of Bray

The role of Bray in the County and south city region is recognised in both regional and County plan and re-emphasized in this LAP. It is agreed that Bray is well positioned to benefit from growth in the Dublin Metropolitan Region that Bray forms part of, and in particular the Council is working hard through various programmes to ensure that positive employment 'spillovers' in particular can be absorbed in Bray.

Bray is well positioned to benefit from the continued growth of the Dublin Metropolitan Region. Significantly more housing projects should be expedited given that the shortage in supply will last for the implementation period of the Local Area Plan. The changes in the European Union with the forthcoming exit of the UK could stimulate new demand for commercial space from companies requiring launch pads into Europe. Bray should stake its claim as a favourable option given its location close to the capital as the gateway, its relative affordable cost of living and the pro-business environment facilitated locally and nationally.

Population targets

The population target for the Bray MD (as is recommended to be further detailed via an amendment to the draft plan) is c. 47,000 by 2028 (Bray – 40,000, Enniskerry – 2,500, Kilmacanogue – 950, rural area – c. 3,500). This is based on the population targets set out in the Regional plan and the County Development Plan. No deviation from these targets is possible through the LAP process.

These are not 'projections' but 'targets' and the purpose of the plan is to put in place a 'framework' that would allow these targets to be met. Neither the plan, nor the Council²⁶, can 'force' the development of all zoned land in order to reach the target, but it is hoped that providing the right framework and infrastructure, development can be encouraged.

²⁶ Unless it invokes widespread CPOs and is given the funding to build 1000s of houses by central Government

With respect to the suggestion that a higher population target should be provided, this is an important issue, particularly in light of the funding programmes mentioned and will receive detailed attention in the formulation of the next regional plan and following County Development Plan. The draft National Planning Framework (recently published) makes mention of the preparation of Metropolitan Area plans, which assumed Bray remains in the Dublin metropolitan area, may involve cross Council development plans and associated population and housing targets for larger agglomerations e.g. Bray – Shankill – Old Conna.

Housing delivery

The Council is keenly aware of the demand for housing in the area and in any way possible, subject to normal development management controls, is expediting the development of new housing e.g. in Fassaroe. Bray has however a very constrained supply of available housing land, and it is therefore necessary and important that bank of 'greenfield' land is designated for housing, as well as brownfield / infill sites which may face more barriers to development. The Council is working closely for example with infrastructure providers and the neighbouring local authority to ensure that new housing areas can be speedily serviced and made ready for construction. The Council has also initiated the implementation of the 'vacant site levy;' in order to stimulate development.

Zoning principles

One submitter believes that any zoning which expands the built-up area in general, to land which has not been built on, or to land which does not have zoning for construction, should be removed. The sentiment is respected, and it is noted that many people have a strong desire to resist development of greenfield sites. However, given the population and housing targets for the area and the high demand for housing, it is simply not been possible to accommodate all of the required housing and employment growth in existing built up areas.

In the case of Bray, of the c. 6,000 new housing units targeted, even assuming a very high density of development on town centre / infill sites, it is only really viable to target c. 2,100 new housing units in the town centre / infill / brownfield sites. The remaining units are in the main planned for a new properly planned 'neighbourhood' at Fassaroe.

There is no 'over zoning' in this plan as suggested in Submission C33 – the population and housing targets are clearly set out and the land zoning provision match same. It is not correct to state therefore that the zoning of land at Kilruddery represents 'over zoning' in the absence of this zone, the zoning provisions would allow indicatively for 5,890 units, while the target is 6,130 units (for 2025). It is accepted that this target represents the target for the 6 years of the plan plus 2 years, but at this stage, with the plan not likely adopted until 2018, this only represents 1 year's 'headroom'. Ministerial guidelines recommend 3 years headroom, and the plan in fact could be considered non-compliant with Ministerial instructions due to the lack of zoned land it provides.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 23, as detailed in Part II of this report (p52)

SECTION 3.8 RESIDENTIAL

This section addresses all residential issues other than the residential zoning of specific sites i.e. it deals with the more general issues raised about housing targets, principles, format, density, design, social housing etc

Sub No.	Issues raised
C47 M. Carroll	<p>Consideration should be given to allowing smaller living units that currently permitted. Smaller units (e.g. 40sqm) if well designed and laid out would provide comfortable living at an affordable price to many sectors of the population.</p> <p>The maximum floor area of 45sqm allowed for 'granny flats' should be revised and any granny flat should be allowed to cater for an independent lifestyle which should include capacity to allow for the overnight sleeping of companion / carer. It is possible to provide for a well integrated extension greater in area than an existing house and likewise it should be possible to provide a large granny flat of any size as circumstances call for it. As is the case now, a granny flat would always be an extension to a dwelling and would not, nor could not, be viewed as a separate individual unit.</p>
C58 Common Ground Housing Co-operative	<p>Common Ground Housing Co-operative is a group of families and individuals based in Bray and North Wicklow who have come together to form a housing cooperative</p> <p>It is the intention of CGHC to create an affordable, inclusive and not for profit pilot project to house their members. They believe their housing cooperative will match several important criteria of the plan, especially regarding residential development, social and community development and the preservation of the natural environment.</p> <p><u>Residential development integrated with community development:</u> They aim to build integrated, cooperative, affordable homes in which owner and tenant members of the coop live side by side and share common amenities. The group comprises 12 households with potential to expand depending on the size of the site. They have a waiting list of 60 households. The project focuses on providing members of the coop with community spaces (kitchen, laundry room, meeting room, space for workshops etc.), shared vegetable gardens, a playground for children, a recreational area for teenagers and young adults.</p> <p><u>Social and community development:</u> they aim to develop a space that will be a centre for the local community and provide various services. They are part of Common Ground which is a grassroots community based project in North Wicklow committed to practical actions to promote a cooperative, mindful and ecological lifestyle. They aim to provide a network and a space to help people support each other in sharing their skills and source healthy and sustainable food. They believe their cooperative can become an education centre offering skills and development models to be shared around the town, the county and the country.</p> <p><u>Natural environment:</u> They aim to run the coop on ecological and sustainable principles. A-rated or passive houses, minimum waste policy, use of alternative energies and local food production are core aspects of the project. They also aim to respect the local biodiversity and promote our local environment and heritage.</p> <p><u>Partners:</u> To achieve their goal they are working with Hugh Brennan from O'Cualann Co-Housing Alliance, an approved housing body which is already working with county councils. Their project in Poppintree recently appeared in <i>The Irish Times</i> as a model for affordable housing. They are also working with Housing Cooperative Ireland to finalise our financial</p>

	<p>model.</p> <p><u>Possible locations:</u> They have identified in the plan a few locations that may be suitable for their project: Kilruddery, Oldcourt House and Oldcourt Castle.</p>
<p>C66 T. Cookson</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p> <p>Housing should be concentrated on the site at Fassaroe, west of the N11.</p> <p>Please provide for co-housing or co-operative housing initiatives. We need affordable housing. Every new development must be required to have social and affordable housing in the mix.</p>
<p>C82 A. Dempsey</p>	<p>Given the characteristics of Bray's housing market (in term of lack of supply and affordability); any steps to increase the housing supply in a sustainable manner should be welcomed. For instance, a better mix of housing might encourage some of Bray's high proportion of retired residents to down-size. There is some potential to free up family-sized houses by encouraging older residents in large houses to downsize. This requires an adequate supply of suitable smaller accommodation such as two bed houses and high-quality apartments in areas that are easily accessible to local services and amenities. Even in urban areas across Ireland, 85% of residential properties are houses, only 13% are apartments. Not all Irish people need or want to live in houses – detached or otherwise – with up to four bedrooms.</p> <p>For many younger residents, locked out of an unaffordable housing market and unable to afford rents in Dublin, one or two bed apartments or studio apartments are preferable. These types of properties would allow for greater density and cater for the housing needs for a wider section of society. They would also allow younger residents of Bray without families, to live in Bray and commute to the city more easily. Currently, over 50% residents of Bray commute to Dublin City Council area to work, rather than moving to Dublin's larger, but more expensive apartment rental market. A greater number of younger residents might choose to reside in Bray if suitable affordable accommodation was available. More young professionals, who have higher levels of disposable income, could help to create more sustainable economic growth for the district.</p> <p>New developments in Bray should include a mix of housing types driven by the needs of those in the community. While one must acknowledge that the growing population will obviously require more family homes, by choosing to build a more diverse housing mix that includes smaller properties, the required housing stock of roughly 6,000 properties in the district by 2025 could be reached. Higher density developments are another method of addressing supply-side issues in the housing market. There is a substantial social dividend to be gained by increasing the population density in urban areas. Density that is well designed makes transit and retail more viable, supports more schools and services close to homes, and supports the clustering of development. Higher density allows residents to work, live, play, shop and learn within a convenient walking distance. Higher densities make walkability possible, and suitable design makes it enjoyable. This creates a sustainability of a community that is more difficult to achieve in lower density areas. Higher density is also a significant boost to commercial activity. Increased density facilitates greater productivity in the economy</p>

	<p>and leads to increased growth. Productivity is boosted through density as a result agglomeration effects; matching skills to the needs of the labour market; sharing supply chains and infrastructure; and the exchange of information and ideas among enterprises. It also increases the viability of public transport infrastructure.</p> <p>Increasing density has the added benefits of reduced congestion, carbon footprint and inefficiencies by minimising time and distances to work and leisure. Densely clustering development also helps better preserve natural areas by reducing the need for sprawling development into rural areas.</p> <p>Demand (and subsequently prices) in both the property purchasing and rental markets are driven up by poorly designed government housing policies. While in theory rent supplements and the Housing Assistance Programme are a solution to market failure in the housing market, but in practice, they simply drive up rents by creating additional demand by placing people in the private rented sector who should not be unfairly placed in the private market.</p> <p>These government programmes effectively act as a subsidy to owners of multiple properties, those who need assistance the least. Local authorities have a role to play in addressing this fact by building social housing. High quality and well designed social housing developments remove people from a housing or rental market that they least able to compete in. This is obviously a challenge that extends beyond the boundaries of Bray Municipal District and requires vision and accurately targeted policy solutions on a national level. However, Wicklow County Council can try address affordability in the district by building social housing where it has the resources to do so, rather than using those resources to subsidise the private market.</p>
<p>C116 A. Endrizzi</p>	<p>The aim of the plan should be to provide housing for those who work or wish to work in Bray, Enniskerry and Kilmacanogue, rather than those who wish to commute out of those areas into Dublin.</p> <p>The population may not grow as significantly as predicted (it must be taken into account that we now have an older population and a lower birth rate), and in future, typical 2-3 bedroom houses may make way for higher density housing (this is quite likely).</p>
<p>C118 A. Ffrench</p>	<p>Restrain, prevent urban sprawl and regenerate: rejuvenation the many industrial and derelict, abandoned sites/areas (Boghall Road, Killarney Rd). Revise draft objectives and zonings to re-balance towards more high-density residential and enterprise on mixed and single-use sites, e.g. Dell, A.O Smith, Industrial Yarns, Little Bray - and have been in decline over the past 5 years. We have a number of sites such as the Dell Site, the AO Smith site, the APC site and others that are in need of redevelopment and regeneration. These brownfield and derelict sites should be prioritised and redeveloped before we look at zoning or developing any greenfield sites.</p>
<p>C142 T. Harvey</p>	<p>With respect to the Council's social housing site on Kilbride Lane, the submitter would encourage the Council to make a major push to get these houses built as quickly as possible. The submitter cannot believe after paying a huge amount of money, this site has been left derelict. The Council to be totally out of touch with the amount of people on homeless list, particularly in north Wicklow.</p>
<p>C209 D. Murphy</p>	<p>Housing is essential – but so is environment, access, and quality of life for local and animals for hundreds of years to come.</p>
<p>C261 M. Rogers</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated</p>

	<p>on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites. Housing should be concentrated on the site at Fassaroe, west of the N11.</p> <p>Please provide for co-housing or co-operative housing initiatives. We need affordable housing. Every new development must be required to have social and affordable housing in the mix.</p>
<p>C268 Stewart</p>	<p>Supports the idea that shops will be able to have residential accommodation above them; it keeps communities economically and socially vibrant, and keeps them safer at night.</p>
<p>C296 B. O'Brien</p>	<p>Social Housing. We ignore this at our peril. Everyone needs a home. The lack of investing in one of life's basic necessities when we had the money is shameful. So build more. Not the schemes of yesteryear but the integration of housing into communities.</p>

Opinion of Chief Executive

Unit sizes and density

The draft plan does not set out minimum unit sizes. Design standards for the plan area are those set out in the County Development Plan. The County Development Plan does not set out minimum unit sizes but does require reference to the provisions of 'Quality Housing for Sustainable Communities' (DoEHLG 2007) and the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2015), which both set out minimum unit size requirements. The minimum size specified for studio apartments in these national guidelines is 40sqm and 45sqm for 1-bedroomed units. These minimum specifications were determined by the Department following expert architectural and planning research. The Planning Authority must have regard for Department Guidelines. However, in the event that the Minister determines that smaller unit size shall be required, any such requirements would be implemented in Bray and Co. Wicklow.

With respect to 'granny flats' again the draft LAP does not set maximum size requirement – such requirements are provided in the County Development Plan. It is considered that 45sqm is more than sufficient for one permanent resident plus a carer / visitor and is necessary to ensure that the unit remains subservient to the main dwelling.

(With respect to both of the above points, these are both County Development Plan matters that cannot be amended through the LAP process).

The draft LAP, in conjunction with the provisions of the County Development Plan, specifically encourages higher density development where appropriate and that new developments contain a mix of unit sizes; the following provisions refer:

R1 All new housing developments shall be required to accord with the housing objectives and standards set out in the Wicklow County Development Plan.

R2 In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands. The Council reserves the right to refuse permission for any development that is not consistent with this principle. Lands zoned Residential – High Density will be expected to achieve a density of not less than 50 units / hectare.

County Development Plan :

HD3 All new housing developments (including single and rural houses) shall achieve the highest quality of layout and design, in accordance with the standards set out in the Development and Design Standards document appended to this plan, which includes a Wicklow Single Rural Houses Design Guide.

County Development Plan, Appendix 1, Section 1 (p9): All medium to large scale housing developments shall include a range of house types and sizes, including detached houses, semi – detached, terraces, townhouses, duplexes and bungalows; unless otherwise specified by the Planning Authority; New apartment developments will be required to include a range of unit sizes to cater for different housing needs;

Cooperative Housing

The plan provides for ample zoned housing land, and such zoning would allow for many different formats of housing to be developed, including cooperative housing. Therefore no particular policy provision is required to allow for cooperative housing, as it would be permissible on any zoned housing land. The securing of land for this project from either private or public owners is a matter for the group concerned.

With regard to the possibility of actually designating zoned housing land specifically for cooperative housing or the 'Common Ground Housing Cooperative' specifically i.e. for an extremely narrow use or for one class of user only, this would be beyond the remit of a LAP²⁷. The role of a plan is to identify and designate land for housing simpliciter and thereafter, subject to compliance with the provisions of the development plan and the Planning Act, the owners have the power to develop the land and sell the units as they see fit.

In accordance with the law, every new (private) housing development must devote 10% of the development to social housing – there is no requirement to provide for affordable housing. Any units delivered through this requirement are allocated to those on the Council's housing list.

Housing Development StrategyAs part of the plan crafting process, all derelict, abandoned or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development. Every opportunity to meet the housing growth target from such sites was taken, and in the majority of cases, a high density objective applied e.g. Heitons, former Dawson's, Dell, FCA, Brook House, Presentation College, Oldcourt, Ravenswell, Everest, The Maltings etc. The draft LAP also makes specific provision for infill on existing developed land in the town centres and living over the shop (Objective R4). The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development, application of vacant sites levy etc.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; however, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands, particularly focused on Fassaroe. It is intended that development at Fassaroe will be of a high density, in order to minimise the land take required.

Note: The APC site is zoned for 'employment' use being in an established and operating employment area and is not considered suitable for residential use. The 'Industrial Yarns' site is not in Co. Wicklow.

²⁷ and could possibly be legally questionable with respect to Sister Mary Christian and others V Dublin City Council [2011 No. 56 JR]

Social & Affordable Housing

It is noted and agreed that increased social housing delivery is required and the Housing Directorate of WCC is working hard to activate all local authority housing sites and secure funding for projects. The LAP, in providing a development framework for the area, aims to support this process. With respect to Kilbride Lane, this Local Authority development is being expedited by the Council and is due to go to tender in November 2017.

Environmental protection

It is agreed that housing is essential and every effort is made through the application of sound planning and environmental protection principles to (i) minimise the amount of 'greenfield' land designated for new housing and (ii) to put in place design and management measures when new development is allowed to occur to ensure the impact is minimal and can be absorbed by the receiving environment. The plan has been subject to numerous environmental assessments including Strategic Environmental Assessment and Appropriate Assessment, to ensure that significant adverse impacts can be identified and avoided in the crafting of the plan.

Living over the shop

This is specifically encouraged in the plan (Section 2.2.5, Objectives TC3 and R10, Zoning TC)

Chief Executive's Recommendation

No change

SECTION 3.9 ECONOMIC DEVELOPMENT

This section of the report deals with the submissions that have been made with respect to Economic Development.

Sub No.	Issues raised
C18 Bray & District Chamber of Commerce	A: The Chamber welcomes the intention to support job creation and as set out in the County Development Plan and the promotion of Bray through Bray.ie and other supports as an area which is attractive to indigenous and foreign industry and urges a holistic approach emphasising the educational facilities in the town, its rail links, the fact that it is adjacent to the national motorway system, within a short distance of Dublin City, Port and Airport and with easy access to the seaports at Dun Laoghaire, Wicklow and Arklow and the available of suitable sites for small, medium and large projects.
C21 Bray Retailers Group	B: The Bray Retailers Group concurs with targets set in the draft Local Area Plan to significantly increase jobs growth in the town centre and in existing employment sites.
C82 A. Dempsey	<p>C: Steps should be taken to capitalise on the scale of Bray's population and economy. This can be achieved through placemaking. Placemaking is a means of strengthening the connection between people, businesses, and society, and the places they share. Placemaking is about the core strengths and weaknesses of different areas. Recognising what the Bray's strengths and weaknesses are will allow the correct strategies for growth, development, and improving the quality of life to be identified.</p> <p>For instance, Bray has been able to attract a substantial amount of FDI to its industrial parks and estates. The UK government's industrial strategy notes that "certain anchor businesses can play a key role in attracting skilled workers to an area, or generating spin off companies". Therefore it is important to Bray's economy to ensure that the infrastructure and skills needs of these companies are met.</p> <p>D: Furthermore, the Council should work with the IDA and Enterprise Ireland to attract new FDI and nurture start-up enterprises. Local policy makers also play a role in facilitating this type of growth by "helping to coordinate the different things that local industries need to thrive, from planning decisions, transport and skills to investments in culture and the quality of life."</p>
C116 A. Endrizzi	<p>E: Consideration must be given to those who work in rural occupations, who may find satisfaction from those occupations, to those who work with or close to nature, to those who live in or visit such areas. Rural employment, food production and nature should be a high priority, allowing farmland and natural environments to be used for construction is likely to store up problems for future generations.</p> <p>F: As much as possible, disused sites on areas zoned for employment should be used for either non-automated manufacturing, very high density housing or parks, but not for offices. There is an abundance of offices and industrial units, many derelict or unfinished, in Wicklow, and in neighbouring Dublin; there is no point in allowing for the construction of more. It must also be said most office buildings also make any landscape generally dreary, in fairness. The high technology sector should not be promoted above local businesses, and should perhaps be at the bottom of the priorities for economic growth in the area – it does not provide large scale employment, there are also ethical concerns in promoting high technology. We must attempt to promote local businesses, and increase employment in</p>

manufacturing and trades, as many find satisfaction from this.

Opinion of Chief Executive

A: Noted and agreed

B: Noted and agreed

C: Wicklow County Council is committed to supporting the development of Bray's economy and employment base. The role of a land use plan, such as this LAP, is however limited to providing the appropriate amount of to support the more targeted economic and employment growth strategies of the Council and other employment agencies, such as the Local Economic and Community Plan and the Wicklow 'Think Tank' strategies. In this regard, the key functions of this LAP with respect to economic development are:

- To set out a planning framework for economic development that is in line with the provisions of the Core Strategy;
- Ensuring an adequate supply of zoned and serviced land for employment;
- Developing a strategy for retail;
- Promoting and facilitating an overall improvement in the quality of life in the area;
- Supporting education facilities and the knowledge economy;
- Facilitating and promoting entrepreneurial activity;
- Supporting employment growth around the area's natural resources;
- Supporting key sectors for growth; such as tourism and film.

It is agreed that recognising what the area's strengths and weaknesses are will allow the correct strategies for growth, development, and improving the quality of life to be identified and every effort has been made in the plan, under various headings, to target the development objectives around (a) exploiting opportunities (such as identifying opportunity sites, encouraging redevelopment of the harbour, development of green routes) and (b) addressing weaknesses (such as objectives to improve roads and transport in the area).

D: The Council's Economic Unit and LEO works closely with the IDA, Enterprise Ireland and any other interested parties and agencies to attract new employment to Wicklow and to support start-ups. The aim of this land use plan, in conjunction with the County Development Plan, is to provide a land-use framework within which this can happen, to bring more certainty to planning decisions, to facilitate and strive for improved infrastructure and to support training and education providers.

E: Rural employment is very clearly supported in the provisions of the County Development Plan and these are not repeated in this LAP as set out in the introduction to the plan, as they will apply directly in the rural parts of the Bray MD.

F: One of the key functions of the plan is to zone land for employment generating uses. This includes the 'E' zones, the town and neighbourhood centres, and the 'mixed use' zones. A range of uses are allowed in each zone, that are considered appropriate for that area. The plan is not overly prescriptive in what form new employment generating development should or can take, as this will be very much dictated by the market. It would not be considered reasonable, as suggested, to designate land for example for only non-automated manufacturing, if no non-automated manufacturing enterprises are interested in establishing in Bray; this could contribute in fact to vacancy and dereliction. It is considered that a flexible approach should be taken so that all employment formats, whether that be light industry, manufacturing, or offices can be open for consideration.

Generally office development provides for a much more intensive employment density compared to

manufacturing, and particular when located close to transport corridors, can provide for a very sustainable form of development.

The plan and the economic development strategy of the Council generally does not promote high technology industries over local small and medium sized industries – all forms and scales of employment creating development are welcomed and supported.

Chief Executive's Recommendation

No change

SECTION 3.10 CENTRES & RETAIL

This section of the report deals with the submissions that have been made with respect to Centres and Retail.

Sub No.	Issues raised
C18 Bray & District Chamber of Commerce	<p>The Chamber believes that the proposed growth in the volume of planned large scale retail floor space to c. 77.000m in Dun Laoghaire Rathdown at Cherrywood / Loughlinstown, and Carrickmines is not sustainable and damages retailing and other activities in the existing Town Centre. Future trends are indicating the rapid growth of online retailing and this will result in little or no demand for this proposed space.</p> <p>The Chamber is therefore concerned at the stated intention '<i>to facilitate the delivery of a large scale retail development on the former Golf Cub Lands</i>'. Any such development will be detrimental to the existing Town Centre.</p> <p>Consideration should be given to allowing small retail development on the river side of the proposed development of the old Bray golf club lands i.e. to create a riverfront of small shops cafes etc on the ground floor of much larger buildings</p> <p>The linking of this proposed development with the existing Town Centre is essential to supplement existing footfall and protect the vibrant retailing and social aspects of the area.</p> <p>The quality of shop fronts within the Town Centre is relatively poor and some of the responsibility has to be taken by the Local Authority in failure to enforce its own planning regulations and to ensure that new shops have high quality shop fronts consistent with the architectural heritage of the town.</p> <p>The LAP should include the intention to employ an architect to oversee all building works not just in the core area of Bray but also in Enniskerry, Kilmacanogue and Kilmurray. This will ensure there is a consistency of design to protect, enhance and improve the quality of shop fronts and signage and to maintain and improve the appearance of these core areas. The architect should be mandated to be proactive in this regard and approach owners of building to encourage improvement and remedial works as he/ she deems appropriate. At the end of the LAP it should be possible to quantify precisely the work achieved as a result of this initiative.</p> <p>There are currently sufficient neighbourhood centres available at the Boghall Road, Vevay Road and a number of large supermarkets all within a reasonable distance from the Southern Cross. Any proposed retail development in this large zoned area will have a negative impact on the existing businesses and traffic flows on the Southern Cross. The Chamber supports the rezoning of the lands on the Southern Cross identified as a 'new appropriately scaled neighbourhood centre' for high density residential (HD25) and Employment (E).</p> <p>Fassaroe should have minimal retailing space if the intention is, as stated, to improve the retailing and other town centre activities in the core area i.e. to encourage the use and business in the existing core centres of Bray Enniskerry and Kilmacanogue and the integration of what will be new residents into the community of north Wicklow.</p>
C21 Bray Retailers Group	<p>The business environment will change as the digital revolution takes full effect. It is foreseen that pure online retail will take significant market share across all sectors, which can only be offset by other growth factors such as higher margins and population increase. A more sustainable retail scenario will be to facilitate the increase in clicks-and-mortar retail offerings</p>

on existing footplates, where residents will be able to buy online and collect in the shop. The traditional model of expansion of retail floor space in correlation with population growth is however not valid anymore. At best the aggregate of existing retail uses should be retained while the allocation of new retail uses should be curtailed.

The traditional status of Bray as a regional shopping destination has diminished over the past twenty years as new shopping destinations came on stream within reach of the North Wicklow catchment area. The future of retail in the Bray town centre will firstly depend on the liveability of the town centre, meaning that the rate of increase of the population within walking and cycling distances of 10 minutes to the centre will be a key consideration for businesses to invest in the changes and improvements to their retail offer in the centre. Secondly, the improvement of access to the town centre will be a critical factor to entice car drivers to do their shopping in Bray. Retailers are concerned that little progress has been made to alleviate traffic congestion on the north-south arterial route and furthermore, they anticipate that with the future developments in Fassaroe, more urgency is required to put in place adequate east-west arterial connections to the centre.

Town Centre Objectives

The Bray Retailers Group applaud the emphasis on the continued vibrancy and life of town centres and the active use of above ground floor levels contained in the Town Centre Development Objectives TC1 to TC5.

The Group however questions the rationale to significantly expand convenience and comparison retail floor space in the county and to specifically target 77,000m² for Bray as a Metropolitan Consolidation Town. The logic seems to be that with an increase in population more retail space is needed. The changes in consumer behaviour brought about by online retail options, put these assumptions to question. Of more importance is the consolidation and revitalisation of existing retail streets and centres.

In this regard, to enable major retail floor space in the former golf course lands as stated in the Bray Town Centre Specific Objective BT2 contradicts Specific Objective BT1 and should be modified to allow for local convenience retail and services serving a new residential neighbourhood.

The height restriction on Bray Town Centre as per Specific Objective BT3 is also a perspective from a different era. For Bray Town Centre to be an attractive destination today will require more population living closely or in the town centre. The centre should resemble an urban form of a small city rather than a rural town. The important element is the vibrancy of the place at eye level rather than if it is 3, 4 or 5 stories high. It is proposed that the emphasis is on the intensification of land usage (mixed) in the town centre zoning without a height restriction and that each planning application be judged on its own merits.

Bray Neighbourhood Centres

The Bray Retailers Group agrees with the designation of neighbourhood centres on the Vevay Road, the Southern Cross Route and the new development in Fassaroe. The Group proposes that the redevelopment of the Bray golf course lands should include a neighbourhood centre and not a town centre designation. The development of neighbourhood centres should be on a scale commensurate with the convenience shopping needs of the local residential areas being served. In adherence to the Town Centre Objectives, comparison retail should be restricted in neighbourhood centres.

As stated above, the rationale for doubling the retail space in Bray to 77,000m² is questionable and clearly will be unsustainable if the current infrastructure is not significantly expanded, which in relation to the topology and the pattern of the built environment in the town, is highly unlikely.

	<p>Bray Opportunity Sites</p> <p>The Bray Retailers Group is confident that the development as proposed for the Florentine Centre in Opportunity Objective OP1 will significantly enhance the destination for shopping and leisure in the Main Street and Town Centre.</p> <p>Furthermore, the opportunities for development of premises on and off Castle St as expounded in Opportunity Objective OP2 and OP3 should be fully grasped to change the area into a high quality high density residential and mixed-use built environment. The notion of 3 to 4 storey development is again pandering to a modest view of growth, when these are the sites well positioned for significant density on a path of more sustainable development.</p>
<p>C82 A. Dempsey</p>	<p>It is crucial that the town centre and Main Street thrives if Bray is to meet its potential as a regional driver of growth. In this regard, it is fair to say that the Main Street has underperformed over the last decade. From a retail perspective, Bray will never compete with Dundrum shopping centre, and nor should it attempt to. While it is not the place of local authorities to determine what business activities should take place and where, Wicklow County Council does have the capacity to create an identity for this integral piece of Bray's economy and encourage high quality retail locate and thrive in Bray. It just requires the vision to do so. Close collaboration with the Local Enterprise Office on the economic development strategy can help in this regard. It is disappointing that the office is only mentioned once in the draft plan and in very vague and broad terms.</p> <p>Economic development could be aided by taking small steps to improve the appeal of the Main Street and surrounding areas. Parking charges and fines make up over 2% of Wicklow County Council's income, so their budgetary impact is not negligible. However, research suggests that where there are fixed price on-street parking charges that for parking spaces that are not overly in demand, business activity and footfall can suffer. In short, local authority parking fees are potentially acting as a drag on business activity on Main Street. A more economically efficient means of gathering income that would boost economic activity without negatively affecting local authority income would be to reduce parking fees. While Wicklow County Council would lose some income in the short term, it would recoup the income following a revaluation of non-domestic property in the County Council area in 2021. Increase footfall would and better revenues for businesses in Bray town centre would be reflected in new rateable valuations issued by the Valuation Office that year, leading to higher rates income from the area. Businesses would benefit from increase footfall and the council would not see lost revenue after the revaluation in 2021. This would help to stimulate economic activity by reducing incentives for shoppers to avoid travelling to the town centre.</p> <p>Making Bray Main Street and the district more generally, a more attractive place to frequent alongside a coordinated shop local campaign could encourage more residents to choose to spend more time and money in the town centre. Additionally, a well-planned and designed built environment has a number of benefits that extend beyond economic.</p> <p>One area in particular in need of redevelopment, as highlighted by the document, is the area around Bray DART station. This is the first point of contact for tourists and others entering Bray by rail. It is crucial that this area is and appears to be well developed. The site opposite the DART station is currently significantly underused. If properly developed, this site and the surrounding area could prove to be an opportune link between the town centre and the sea front. Were there an effective link, the two could form a prosperous economic corridor for Bray's development that could far exceed the sum of the parts.</p>

C116 A. Endrizzi	Retail units should be strictly limited to the Bray town centre area (Main Street). It seems unnecessary and unreasonable to have convenience shops and larger shopping centres in Enniskerry and Kilmacanogue. The draft plan appears to allow for improved routes between Enniskerry and Bray; this may defeat the purpose of having more retail units in Enniskerry.
C273 Tesco Ireland	<p>The retail sector makes a major contribution to Bray, increasing vitality and viability as well as providing an economic anchor for the town. The submitter is encouraged by the inclusion of policies in the Local Area Plan which provide support for retail and commercial operators. The continued reference to the Vevay Road Neighbourhood Centre and its role in providing essential services to Bray, as detailed in the Retail Strategy that forms part of the Wicklow County Development Plan 2016-2022, is particularly welcome by the submitter.</p> <p>The publication of the clarification document which was issued on 21st August 2017 is also welcomed, as this document includes the objective, description and location of the Neighbourhood Centre zoning, as well as outlining the uses that are generally considered appropriate. Tesco would request that this clarification is included as part of the final Local Area Plan. It is, however, submitted that Wicklow County Council should review how this clarification was published and if the material alteration mechanism needs to be used to ensure that the contents of the clarification document are included in the final plan, in compliance with the requirements and procedures of planning legislation.</p>

Opinion of Chief Executive

Retail growth in south Dublin

It is agreed that the planned / permitted growth in retail in locations such as Cherrywood and Carrickmines is potentially damaging to town centres such as Bray. The Council strongly opposed for example the level of retail permitted in the Cherrywood SDZ. Notwithstanding the potentially excessive level of retail floorspace in the south Dublin – North Wicklow region, it is considered that it is still appropriate for Wicklow County Council to plan for and promote significant new retailing in Bray to create a critical mass of retailing, and to attract in expenditure by both residents of Bray and those in surrounding area, that would otherwise leave the area for Carrickmines or Dundrum.

Retail Growth in Bray

The priority in terms of additional retail floorspace is the traditional centre / core of Bray – i.e. along the Main Street. The Council is committed for example to developing the Florentine site as a major shopping and lifestyle destination at the heart of the Main Street, which will potentially bring new vibrancy to the area and attract further retailers and commercial / cultural activities. However, one must bear in mind that there is limited land, even brownfield, in the centre of Bray and in order to ensure that significant new retail and commercial activity can occur, sites at the 'edge' of the centre must be considered. This is of course preferable to the alternative, which are 'out of centre' locations. There is an obvious site for such development – the former golf course, and this has been designated in a number of development plans as the focus for new town centre development in Bray.

The Council is committed to ensuring that any development that occurs on these lands forms a natural extension to the traditional retail area and that there are well developed connections between the two areas, to ensure synergy and spin off benefit from one to the other.

In addition, with the protection of the traditional town centre in mind, this plan provides for a reduced level of retail / commercial development on the golf club lands compared to previous plans / permissions.

It is agreed that the future of the town centre will hinge on the attractiveness of the centre as a place to live, work and play. In this regard, development in the town centre is the priority of this plan, and the plan sets out objectives for intensive town centre / infill development where opportunities arise (such as the identified 'opportunity sites'). With respect to access to the town centre, the Council is working closely with

the transport agencies to develop an overall plan to reduce congestion, enhance accessibility and public transport in the town centre.

While it is accepted that there is a significant shift to online retailing occurring, it is still considered appropriate to plan for retail floorspace growth in Bray, in accordance with the regional retail strategy and the County retail strategy. A strategy to limit the floorspace in Bray can only be grounded in accepting that people should travel to retail centres in the Dublin area that would be contrary to the basis of proper planning. However, if the demand is simply not there for additional retail floorspace in the coming years due to technological changes, the targets of this and the County Plan can always be modified and indeed, if the developer of any site designed for significant retail can show that the demand simply is not there, alternative uses can be considered for the same lands. (It is considered however, that it is essential, particularly in the town centres, that adequate floor space is provided for non-residential uses, whether that be retail, commercial services, or cultural / community uses).

With respect to the issues raised with respect to car parking / marketing strategies etc for the district generally and Main Street in particular, while worthy of discussion these are not relevant to a land use plan. Bray Municipal District/Wicklow County Council already participates and often leads in marketing campaigns to promote retailing and business, but not in their role as a statutory planning authority.

(Note: Car parking generally is dealt with in Section 3.14 of this report).

Neighbourhood Centres

The support for neighbourhood centres at Vevay and SCR is noted and it is agreed that neighbourhood centres should be on scale commensurate with their catchment. Generally comparison retail is limited in such centre, in accordance with Objective RT25 of the County Development Plan (20% limit on comparison floor space in convenience stores outside of the core retail area). The Bray golf course is not specifically designated as 'town centre' but rather as a new mixed use area, located adjoining the established town centre. It would not be logical to design this area for a neighbourhood centre, which is normally a supermarket plus local shops outside of the core retail area, serving localised catchment – the golf club site is effectively 'in' the town centre and it is intended it would form a natural extension to same.

Neighbourhood Centre, Southern Cross Road

This matter is address separately in this report.

Retail in Fassaroe

This matter is address separately in this report.

Retail in Enniskerry & Kilmacanogue

This plan, in accordance with the County Development Plan, allows for that quantum of retail development in these smaller settlements that is appropriate to their size and catchment – there is no provision for major 'shopping centres' in these towns. The primary shopping location however for the wider MD, where higher order shops and goods could be expected to be found, is in Bray. More localised, particularly convenience shopping, is needed in smaller towns to ensure that residents can access such goods without having to travel long distances.

Shop fronts / design

It is agreed that the quality of some shop fronts are poor, and the Council, where feasible, utilises its powers under the Planning Acts to address unauthorised developments. The Planning Authority also as a matter of course implements the design provisions set out in the County Development Plan for new shopfronts (where such shop fronts apply for permission).

There seems to be an impression that there are no longer any standards for shop front applicable in Bray,

however as set out clearly in the introduction to the plan:

"The majority of policies, objectives and development standards that will apply in the Bray Municipal District are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area. While this will facilitate the streamlining of this plan to just those issues that are relevant to this area, and an overall reduction in the content of the plan, this should not be seen a diminution of the level of importance or indeed protection afforded to this area.

In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated. Any specific policies / objectives or development standards required for this area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans, and the general public alike".

Detailed shop front design standards are set out in Volume 3, Appendix 1, (p37) of the County Development Plan and these are directly applicable in Bray (in fact, these County wide standards were prepared for Bray).

It is considered that these design standards are very clear and user friendly; there would not appear to be any benefit or need to prepare a separate document essentially setting out the same requirements. The preparation of a standalone guide, with additional information and guidance on exemptions that might be applicable, could be considered as an implementation action, post plan adoption, by the Planning SPC.

The LAP is a land use framework, and it would be beyond that remit to include an objective to employ an architect; this would be an operational and funding matter for the Local Authority.

Building height

With respect to the opportunity sites identified on Castle Street, it is considered that 3-4 storeys is reasonable, given that the prevailing height in the area is 2 storeys. This would be consistent with the building height provisions set out for the town centre zone generally in objectives BT3. It has however been noted on foot of this submission and issues raised with respect to the building height that would be allowed on the golf club site, that there is a slight wording confusion with respect to BT3.

Objective BT3 states:

BT3 *Generally, a maximum height of 3-storeys above ground level will be considered appropriate in Bray town centre, irrespective of adjoining property heights. However, the Council may permit heights above this, where the specific context of the site and the design of the building allow it (for example where additional storeys are set back from street frontage).*

This objective was meant to indicate that 4-storey developments were generally acceptable (including the ground floor) rather than 3-storey. This will be rectified by way of a proposed amendment.

Bray Station

This is dealt with in Section 17 of this report.

Zoning clarification

In error, a zoning code was omitted from the zoning table published with the plan. A correction was made when this was brought to the Council's attention. It is recommended that this correction is made part of a formal amendment to ensure no ambiguity.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 2, as detailed in Part II of this report (p17)

Amendment No. 18, as detailed in Part II of this report (p42)

SECTION 3.11 COMMUNITY DEVELOPMENT

This section of the report deals with the submissions that have been made with respect to Community Development.

Sub No.	Issues raised
C8 Ballywaltrim & Wingfield Residents Association	<p>CD3 There is still no skate park facility in Bray despite the demand and the desirability of making recreation provision for young people. The plan should include for a skate park where there is access to public transport and sufficient open space for it. A location on the seafront would be ideal.</p> <p>CD6 The development of allotments/community gardens is supported. No site has been identified and suggested sites such as on Rehills Land and the FCA site on the Vevay may be considered.</p>
C18 Bray & District Chamber of Commerce	<p>BIFE: Bray MD is fortunate to have a third level facility in the town. The LAP should ensure that the future plans of the college and its requirement for expansion, student accommodation, and for playing / recreation facilities are adequately catered for as near the town centre as is practicable</p>
C24 Bray Skateboarding Association	<p>On behalf of the Bray Skateboarding Association (BSA) and its members, this submission relates to the need of a skatepark in Bray on the following grounds:</p> <p>Obesity and Mental Health</p> <p>Minister for health, Simon Harris has stated in 2016 <i>"In recent years, levels of obesity have increased dramatically with 60% of adults and one in four children in Ireland either overweight or obese"</i>. Knowing that forms of physical activity are important, this concern should be running through any thought process for considering an amenity that will promote exercise. Furthermore, studies have shown obesity can cause poor self-image, low self-esteem, and social isolation, all known contributors to depression. Depression or mental health in Ireland has lately been getting the limelight too as it is a major problem. Skateboarding may have a strong potential to help alleviate these statistics. Since skateboarding does not have the traditional competitive point system as many other popular sports such as scoring a goal/point in football, basketball, tennis, rugby, Gaelic football and hurling, there is a large target group of people who do not participate in physical activities solely because of how competitive they are in nature but whom would be far more motivated to use a skateboard. For this, skateboarding open to all ages, gender and ability.</p> <p>Low political risk of the youth and the effects on obesity and depression.</p> <p>Perhaps the political risks by the council's decisions have been low when considering the youth, since they cannot vote or have only begun to vote. Young voters tend to have low poll turnouts and in general have had a low interest in politics. If this is true, it could very well be the reason why the need for the skatepark has been around Bray since the 1990's. Currently there is a European mandate to lower voting ages to 16. Fianna Fail has agreed to these terms and yet have blocked any progress of changing the voting age when Lynn Ruane proposed a bill in this nature. A more recent example of how perhaps the council hardly considers the youth is the information day for these submissions lay on the same day as the leaving certificate results. This clearly shows less opportunity for the youth to be involved of what is already a challenge. Another potential problem regarding the structure of the council is the gender equality.</p> <p>Having seen lots of feedback online about a skatepark in Bray, the BSA can note that rough estimate shows a ratio of 6:3 (women to men) were engaged in positive remarks on a skatepark as a public amenity in Bray. This clearly shows that a council of men could quite</p>

	<p>possibly be unaware of the needs of the town from just a male perspective. Of course, this cannot change in an instant, but should inspire the council to have a more sensitive perspective in the areas that they may not be aware of. Participation of skateboarding in Bray, from observations, tend to drop off in every generation as they get older, more so than other sports. This seems to stem from lack of facilities and uncomfortable surroundings for adults to skateboard. It is unfortunate that an adult should feel embarrassed to be active in any form.</p> <p>Skateboarding as an Olympic Sport</p> <p>As skateboarding has now been entered into the summer Olympics Tokyo 2020, there should be a far greater development of the sport in Ireland. As mentioned previously, participation can be a great struggle without facilities and also without a body to push for development. The BSA believes they can advise on a suitable skatepark that will facilitate all levels of skateboarding. The BSA also believe they can help maintain the skatepark, help run events and overall improve the quality & quantity of participation. The BSA would therefore be able to provide a suitable sport to many people who are not motivated by the competitive nature of other traditional sports, while also being able to provide for people who are also searching for a competitive sport. Overall the potential to improve the statistics of mental health and physical health in the Bray area is large, but depends on the council's decision on how it creates a skatepark.</p> <p>BSA's goals for having a skatepark</p> <ul style="list-style-type: none"> ▪ Decide what to build ▪ Be involved while building it ▪ Take care of it when it is done ▪ We want to fill it with activities ▪ Hold events while collaborating with the town <p>If there is a skateboarder part of every process, then it is far surer that investments made will have a stronger return for the town and the skateboard community.</p>
<p>C33 C. Burrell</p>	<p>In relation to amenities for Bray, the submitter believes the seafront would greatly benefit from a skateboard park which could be situated on the green area of the north side of the Sealife Aquarium which is currently not in use for any other amenity.</p>
<p>C46 Carlisle Grounds Residents Group</p>	<p>The concern of the group is the protection and maintenance of sporting amenities and good future planning within the town of Bray. This a very detailed submission and is set out verbatim to follow:</p> <p><i>"We'd envisage the Carlisle Grounds having 350-400 apartments. What we would propose is building these apartments with a certain percentage sold. The percentage sold would cover the building costs of the new facility and the remaining unsold units would be kept with the rental income paid into a new trust which we are going to form."</i></p> <p>This is an excerpt from correspondence set out by Bray Wanderer's chairman (now Gerry Mulvey, a well known developer) to Wicklow County Council where he specifies the outcomes of any potential rezoning of the Carlisle Grounds. Supposedly, most of the apartments, which could be up to 500, will be sold to fund a large modern sports centre ("somewhere west of the N11" but not specifically in the Bray or even Wicklow area) and the remaining units will be kept for rent revenue (at top market rate no doubt) to generate profit to be paid into a trust to fund the future of the same privately owned and controlled centre – if this goes forward. In short any rezoning or removing of protections around the Carlisle Grounds will lead to speculative development on behalf of private licence holders to</p>

consolidate and maximise financial benefit to themselves at the cost of the loss of the publicly owned facility and, given recent turbulence in the club, a dubious future for the re-investing of funds elsewhere into private ownership. Rezoning the grounds or extending the powers of the current licence holders over the grounds will be the first step in bringing about this deleterious and irreversible scenario in Bray town. If an example is needed of how this has played out on a similarly questionable basis, as a mere licensee becomes private profit based owner of a public facility in Bray, we need look no further than the Barracuda debacle which has seen a publicly held seafront facility become a privately owned commercial entity with a detrimental cost to the public good going into the future. If Bray town, which is all about the seafront, is subjected to the effects of such a mistake to be made in relation to management of public assets, we can legitimately fear how this prospective licensee/developer/owner situation will play out around the Carlisle Grounds. This was a point underlined by the Bray Town Council Chairman and Bray town councillors during public meetings in 2016/2017. The contradictory and obfuscating statements issued by Bray Wanderers' chairmen regarding their intentions over the Carlisle Grounds, has only served to further erode our confidence in the owners of Milway Dawn Ltd as suitable partners in any public/private scheme now and in the future. Bray Wanderers as a team, or other sporting teams, could easily stand to lose both the use of this historic sports facility and fall between the cracks of privately driven deals and vested interests should any rezoning step be taken in relation to the grounds.

However this scenario plays out, it is a plainly preposterous project. There is no breakdown of profit accruing to the developer himself on construction of the units in relation to profit driven towards construction of a new sports centre. A lack of credulity is further evidenced by the unbalanced 5 year plan issued by Bray Wanderers' recently departed Denis O'Connor, which provides no projected costings for a new stadium, and leaves the council to concern itself with un-costed transport facilities. The figures provided in that proposal are based on a comparison with Telford football stadium. The borough of Telford has a population of 170,000 and Bray has a population of 32,000 approximately. Also, Bray has the competing sport of Gaelic Games, which is not factored into any equation. The comparison is ingenious. Any rezoning of Carlisle Grounds would be an inevitable step down the path of realising this unfortunate scenario.

We wish to make you aware of a number of further specific objections that we have with regard to the proposed rezoning and subsequent development of housing on the Carlisle Grounds, as noted in the Local Area Development Plan. As Bray residents and members of the awareness group Save The Carlisle Grounds (membership 223), we are of the view that the proposed development will have a serious impact on the quality of life of the townspeople of Bray. We believe that any proposed rezoning of the Carlisle Grounds would lead to developments that do not respect and are in direct contravention of the Council's own long term planning guidelines and objectives and of national planning guidelines and objectives including, among others, the following: • Wicklow County Play Policy 2016-2022, 2011-17, • County Wicklow Sports and Recreation Policy (DRAFT), 2004, • National Spatial Strategy 2002-2020, • Ready, Steady, Play-A National Play Strategy 2004, • National Action Plan for Social Inclusion 2007-2016.

Specifically, we believe the following guiding principles would be contravened:

The Vitality of the Town Centre.

"The Council will look unfavourably on new developments that have an adverse impact on the vitality and viability of the town centre. Proper planning and development includes promoting healthy town centres, in the public interest. Where new developments compromise this

planning goal, they will be rejected."

Match days in the Carlisle Grounds are always special days. They bring Bray Wanderers supporters, including the old, the young, the disabled or otherwise marginalized, into the town centre to re-establish old friendships and build new friendships. It cements a sense of being a citizen of Bray – part of a community with a very established sense of place in the heart of the town. It also brings visiting supporters from Dublin, Cork, Dundalk, Sligo, Derry and many other parts of the country, to the very heart of Bray town with a knock-on financial benefit to the town's shops and eateries. An out-of-town facility would have a detrimental impact on the vitality and viability of Bray town centre. Depriving the citizens of Bray of an historic sporting facility in the very heart of the town cannot but diminish the vitality and viability of the town centre.

Recreation

*"The Council attaches great importance to the retention and creation of areas of recreational and amenity open space. **It is important for physical and mental health that everyone, particularly children, the elderly and those with disabilities should have easy access to public open space.** Attractive open space, **whether or not there is public access to it,** is also important for its contribution to the quality of urban life by providing important green lungs and **visual breaks in built-up areas.** Open space can enhance the character of residential areas and protected structures. It can also help to attract business and tourism and can contribute to the process of urban regeneration."*

The Carlisle Grounds are absolutely centrally located at the heart of the transport infrastructure in Bray – it is the most easily accessible location in comparison with any other possible location. We have noted that there are many elderly and disabled citizens who attend sporting events in the Carlisle Grounds – many of whom do not have access to private transport and could not easily access anywhere else.

In reference to Bray Town Development Plan 2011-2017, core strategy map 17 and other related maps, we note that the Carlisle Grounds are zoned OS2 and are surrounded by high density residential areas and lands ear-marked for significant development. The development of the Carlisle Grounds would contravene the stated open space requirements for the population density.

*"Recreation forms an important component of life and encompasses many activities with major land use implications. **The Council recognizes the increasing concern felt by many communities that open space with recreational and amenity value should be protected from development and adequate provision made for future use**".*

We have noted with concern developments in Bray Wanderers/Milway Dawn Ltd. The takeover of Bray Wanderers by individuals involved in property development is, we believe, an unwelcome development and one that causes us great concern. We would expect the County Council to act as a fully independent counter balance to the commercial motivations of bodies which hold leases on public land, acting to protect the greater interests of the citizens of Bray.

Open Space

"It is the policy of the Council to protect, enhance and maintain existing open space.

The Council will not normally permit development that will result in the loss of public or private playing fields, parks, children's play space, amenity open space or land zoned for recreational or open space purposes. The Council will provide additional public open space in appropriate locations.

*Open space is essential for active and passive recreation. It contributes to the character of the town, and provides valuable green areas for wildlife corridors and habitats. Use of land, as open space is therefore no less important than other uses. **It is a valuable resource and the Council attaches great importance to its retention, for once built on the value and amenity of open space is almost certainly lost to the community forever.***

The Carlisle Grounds have been a public sporting facility in the heart of Bray town since 1862. Neither over-arching ambition nor lack of use of the grounds by a succession of sporting groups has ever left them open to the threat of redevelopment until now. We do not believe that circumstances have changed to such an extent to justify the loss of the Carlisle Grounds on any basis.

Sport

"It is the policy of the Council to support the implementation of the 'County Wicklow Sports and Recreation Policy 2004', in co-operation with the relevant authorities.

The Council will work in partnership and co-operation with organisations and the community to maximise provision, maintenance and usage of sport and recreation facilities within the town.

We reiterate our argument here that the loss of the Carlisle Grounds is a direct contravention of the stated aims of the council to maintain and protect sporting amenities *within the town*.

Social Infrastructure

*"The provision of 'social infrastructure', in the form of buildings, facilities, clubs and the **means of accessing and using services**, is necessary for the development of sustainable communities. The purpose of such infrastructure is both to provide a service and also to promote community cohesion and community identity and in doing so combat social isolation and alienation. A wide variety of facilities are required in order to have a functioning and developing society, and one's use of facilities will dependent on a range of factors including age, family structure and physical ability. Essentially there are four broad categories of facilities:-*

*(3) Leisure and recreational facilities including community / youth centres, indoor halls, dance /gymnastic studios, **playing pitches**, courts etc;"WDP 2010-2016*

There are many other sporting and community associations, such as Ardmore Rovers, that would readily make use of the Carlisle Grounds if Bray Wanderers wish to relocate their club elsewhere. In the past, the Carlisle Grounds has been used for a diverse range of community activities such as an ice rink, for fireworks displays, croquet and flower shows. It would be ideally placed to function as a MUGA, such as a skate park or basketball courts, an ideal facility for the youth of Bray. Failing its use as a sporting facility, it could indeed be used for allotments, as proposed in the Draft Wicklow County Development Plan 2016-2022,

	<p>Community Development, Open Space.</p> <p>Population Density and the Planned Growth of Bray <i>"The following standards apply with respect to the development of new high density residential zones per 1000 population: 1.6ha outdoor play space (pitches, courts, sports grounds) - 0.6ha casual play spaces (parks) - 0.2ha equipped play space (playgrounds and MUGAs)."</i></p> <p>We would expect the standards which Wicklow County Council demands of new residential developments should equally apply to the pre-existing town community and we find any proposed retrograde step disturbing. We would like to know what underlies and justifies the differing standards that seem to be called into play in this scenario. Given the fact that Bray is defined as a Metropolitan Town Centre, with significant land in the environs due to be rezoned for housing development, we strongly question why this relatively small piece of open space which is so important for our community should, in this context, fall prey to rezoning while under the control of a company owned by people involved in property development. The provision of a long term lease to the Barracuda followed by its sale to the lease holders is ever present in our minds.</p> <p>Conclusion We believe the proposal to contravene this guidance as it is to the detriment of the quality, character and amenity value of the area, as outlined in the points above. We note that the Carlisle Grounds are the only potentially multiple use publicly owned sporting grounds in Bray town centre. We believe that the road network leading into and out of this part of Bray is already significantly stressed and could not sustain the added volume of vehicular traffic that housing development on Carlisle Grounds would contribute. The Dart line and bus services will not compensate for this.</p>
<p>C66 T. Cookson</p>	<ul style="list-style-type: none"> ▪ It is vital that recreation space be preserved in the town - there is not enough of it as it is - it absolutely should not be built on - we need MORE recreation spaces. ▪ Please prioritise land for community gardens and spaces where people can grow their own food.
<p>C67 J. Corcoran</p>	<p>It is suggested an additional paragraph be inserted in SLO5 as follows: <i>"Wicklow County council will preserve the Carlisle Grounds for active sporting purposes, Should Bray Wanderers decide to terminate its lease here, Wicklow County Council will seek to offer the Carlisle Grounds to another sporting organisation or organisations so as to retain the Carlisle Grounds in active sporting use"</i></p>
<p>C116 A. Endrizzi</p>	<p>There seems to be a lack of large parks, or land left in its natural state, in Bray, the plan should attempt to address this.</p>
<p>C182 Residents of Martello Terrace</p>	<p>Seapoint Road to Quinnsborough Road Walkway behind Carlyle Grounds Martello Terrace Residents are concerned about the walkway running along the back wall of the Carlyle Grounds from near the railway bridge on Seapoint Road to the level-crossing area of Quinnsborough Road, which is a useful route for residents of our Terrace to take to the station as it cuts out the delays crossing the tracks when the level-crossing gates are down - as they so often are - or having to scale the footbridge. However, few of us are brave enough to use this path, which daily and nightly attracts groups of loiterers with a menacing air about them (though in fact we have not personally encountered any hostile behaviours on their part, at least in daylight hours) and extensive littering with bottles (often broken and highly dangerous), cans, take-away rubbish and other litter, which is only infrequently cleaned up, which is not properly lit, and where we suspect that the visible CCTV camera at the station end of the lane does not cover the whole length of the lane. We call on the Council to work out a plan in consultation with the local Garda Siochana for dealing with this dirty and potentially dangerous track as soon as possible and to inform us of the measures</p>

	<p>being taken.</p> <p>Carlisle Grounds Martello Terrace residents very much hope that the Carlyle Grounds, or most of it, can be retained as a green space</p>
<p>C233 Sugarloaf Crescent Residents Association</p>	<p>It is noted that the Temple Vevay Sportsfield is being rezoned from OS, Open Space to AOS, Active Open Space. Given that this is a shared Open Space between the Wolfe Tone & District Youth Club and the residents of Sugarloaf Crescent, will this proposed rezoning impact negatively on the residents rights to enjoy this open green space? The residents of Sugarloaf Crescent have an agreement with the WT&DYC, BMD and Lord Meath for access to the field for children to play and for residents to traverse in order to access local amenities. In the circumstances the submitter would ask that the Temple Vevay Sportsfield remain as it is already zoned to protect the long term interests of the residents of the area.</p>
<p>C259 P. Robinson</p>	<p>This submission objects to the 'RE' zoning of a piece of open space between Glencourt and Giltspur (changed from OS4 in previous plan).</p> <div data-bbox="699 763 1107 1167" data-label="Image"> </div> <p>Under the Bray Town Plan 2011-2017, the objective of zoning "OS4" is "To preserve continuous open space along the river valley". In relation to OS4, Policy 9.4.5.4 of the current plan says "It is the policy of the Council to preserve continuous open space along the Swan River Valley ensuring no negative impacts on the natural environment of the area. This zoning provides for the preservation of the open space along the river valley as well as the preservation of trees, consistent with maintaining the flood capacity of the stream."</p> <p>Acceptable uses for this zoning as outlined in the plan are:</p> <ul style="list-style-type: none"> • Permitted in Principle: Cemetery, Open Space • Not Normally Permitted but Open for Consideration: Car Park, Church, Commercial Recreational Buildings, Community Facility, Cultural use, Education, Private Club, Private Garage, Recreational Facility/Sports Club. <p>As noted before, the Draft Bray Municipal District Local Area Plan has zoned these lands "RE" — Existing Residential. The objective of this zoning is "To protect, provide and improve residential amenities of existing residential areas" and the vision is "To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted."</p>

Principle of Zoning

The change in zoning from "OS4" to "RE" is unusual. The words 'Existing Residential' suggest the land is already residential, when this is not the case. Whilst the zoning "RE" — Existing Residential, includes reference to "area of open space", this is again preceded by the wording "In existing residential areas". Moreover, open space in residential areas is normally associated with a play area or an enclosed space primarily used by the local residents, not a green corridor previously zoned "OS4".

Other nearby areas in the draft plan that have gone from "OS4" to residential, have been zoned "...New Residential". This change in zoning is certainly more visible to members of the public in terms of colour, for example "R20 New Residential", which is highlighted bright yellow in the draft plan, as is shown in the Oldcourt area.

In any case, the draft plan says its preferred strategy is for "2 (a) Densification of development on all existing housing/mixed use/town centre lands but no changes of use from non-residential use to residential (i.e. no open spaces/employment zones etc. to change to residential)". The change of zoning from open space to residential is clearly in conflict with this.

Loss of Open Space

The draft plan goes onto note "*Of key importance in the crafting of this plan was recognition of the shortfall in active open space*" and "*a priority concern in the Bray MD is the provision of adequate Open space*"... "*CD4 The redevelopment for alternative uses of open space and recreational lands whether owned by private recreational clubs or publicly owned, will normally be resisted by the Planning Authority unless suitable and improved alternative recreational facilities can be provided in a convenient location.*" In this case, no other alternatives appear to be proposed.

(Further reference is made about existing residential lands and open space, but given the area in question was previously zoned open space, these comments seem irrelevant.)

Promotion of the Green Corridor

Objective GI5 of the new plan seeks "*To promote the development of a series of major open spaces and recreational areas linked by green corridors where feasible*" (See map GI1) In addition, objective RO9 says it will "*promote and support the development of enhanced or new greenways at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links... (including) Bray - Swan River Kilruddery to Dargle River*". The reduction of open space to the south of Glencourt, which forms part of this greenway, is again in clear conflict with these objectives.

Protected View

The importance of landscape and visual amenity and the role planning plays in its protection is confirmed in the Planning and Development Act 2000, which requires that Development Plans include objectives for the preservation of the character of the landscape, including views and prospects.

Policy NH52 of the Wicklow Development Plan says it is the Councils policy "*To protect listed views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an obtrusive or incongruous feature in that view / prospect. Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect.*"

One of the listed protected views within the draft plan is the Swan River. Specifically "*Schedule 10.14 (b) Protected Views and Prospects, 4. The view both up and downstream of the Swan River Valley, from both sides of the bridge on the Killarney Road.*" If this view is altered, then its importance and value naturally diminishes.

Whilst it may be argued (erroneously in my view) that "RE"- Existing Residential allows for

	<p>open space, the protection afforded under "OS4" (or similarly "OS1" in the draft plan) is much greater.</p> <p>Loss of Habitat and Wildlife</p> <p>An area's habitat and wildlife is vitally important to its residents health and wellbeing. Whilst the current plan contains many references to habitat and wildlife, the draft plan's policy references to this are much sparser. Regardless, the draft plan (objective B4) does say it will seek "To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows ... other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network in Wicklow."</p> <p>The Swan River Valley acts as an important habitat and wildlife corridor in Bray and supports many different species of flora and fauna. Any reduction of this space should be strongly resisted in accordance with objective B4.</p> <p>Protected Trees</p> <p>The current Wicklow County Development Plan contains a specific objective on the preservation of trees. Objective NH14 says it will "<i>promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan.</i>" Under Schedule 10.08 Existing Tree Preservation Orders - Bray Municipal District wide, the area between Oldcourt House and Vevay House, Swan River Valley is listed as having a tree preservation order.</p> <p>Any change in status of the area from "OS4" to "RE" arguably puts more pressure on this area and Tree Preservation Order listing, by virtue of the greater emphasis on residential development permitted under "RE".</p>
<p>C261 M. Rogers</p>	<ul style="list-style-type: none"> ▪ It is vital that recreation space be preserved in the town - there is not enough of it as it is - it absolutely should not be built on - we need MORE recreation spaces. ▪ Please prioritise land for community gardens and spaces where people can grow their own food when planning new housing
<p>C275 R. Benville</p>	<p>The submitter fully welcomes the Council's continual support for the retention of the Carlisle Grounds in Bray as a major sporting venue.</p> <p>Bray Wanderers have a current lease on the grounds from Wicklow County Council. There has been considerable press coverage and speculation in recent times of the intentions of the Bray Wanderers owners to have the site re zoned to permit residential development for sale and rental on the site and for the club to relocate to the periphery of Bray. It would be most unfortunate if Bray Wanderers elected to relocate but that is their prerogative if they have the capacity to terminate the current lease with Wicklow County Council and have a suitable alternative site to relocate to. That is not reason for the current sporting and recreational use of the site to cease or for the zoning to change. The site can be leased to others, if necessary.</p> <p>The Draft LAP adopts the Core Strategy of the current County Development Plan 2016 to 2022 in respect of housing land supply. The amount of zoned land identified in the Draft LAP is consistent with the County Development Plan. While the LAP will have a life to 2023, sufficient residential zoning has been provided for population and housing projections to</p>

	<p>2025. This zoning includes "headroom" to allow for greater location choice and to deal with any land supply inflexibility which may arise. The existing Carlisle Grounds are therefore not required for housing and, if zoned for such a use, would either create an oversupply of housing land that is not consistent with the County Development Plan or require the County Development Plan to be amended in advance of the LAP being amended and adopted.</p> <p>The Carlisle Grounds are ideally accessible to all. Much of the town's population can access them on foot and bike and public transport connections are excellent, including proximity to the Dart/ Rail line and access to bus services. Road connections are also good and town centre parking plentiful. Indeed, as noted by the Director of Services in a recent planning report in respect of planning application 17/811, The Carlisle Grounds itself has a role to play in town centre parking provision.</p> <p>In recent times The Carlisle Grounds have undergone improvements and now have capacity for around 7000 supporters, almost half of which can be seated. In addition to the facility being home to Bray Wanderers it has also hosted a number of other significant sporting events including UEFA Regions' Cup matches and international rugby league matches. The potential exists for further improvements to increase the attraction of the facility as a major sporting venue in the heart of Bray. This will only be achieved if the proposed zoning is retained.</p>
<p>C291 K. Wolahan</p>	<p>Consideration should be given to the fact that the Carlisle Grounds has potential for development whilst maintaining its current status.</p> <ul style="list-style-type: none"> ▪ There is potential for the development of a multi-storey underground carpark at the northern area of the grounds (this area is currently used as a ground level carpark), which would be of benefit to visitors, Dart, and future Luas users. ▪ Consideration should be given to the backdrop to the north (Carlisle Grounds) portion of this Specific Local Objective 5 (Bray Gateway and Transportation Hub). This area comprises of crude blockwork wall in various finishes (apart from the Cenotaph, which should remain). If the "linkage" objective is to be realised it is essential that this area should be included in the Plan. This could take the form of sympathetic mixed low-rise retail building(s) or structure(s) complementing (whilst maintaining) the objective for the Carlisle Grounds.
<p>C296 B. O'Brien</p>	<ul style="list-style-type: none"> ▪ A Skate Park. There is a grassed area above Naylor's Cove which could work. ▪ Develop the North Beach as a Dog Park for 'off the lead' exercise. It wouldn't require a lot more than a gate on the pier for access and to stop dogs from escaping. ▪ More seating. There's plenty on the seafront but a lack of it in the town. ▪ Keep The Carlisle Grounds as a recreational and green area. Putting towns under concrete is environmentally unsound and it removes part of the history of the town.
<p>Opinion of Chief Executive</p>	
<p>Education</p> <p>BIFE: The LAP supports the development of BIFE (and other educational establishments) through its zoning provision and objectives. It is recommended that these provisions be strengthened on foot of submissions received (see proposed amendment No. 4).</p> <p>Carlisle Grounds</p> <p>The LAP contains no policies, objectives or proposals involving a change of zoning of the Carlisle Grounds from the current Active Open Space designation. Such a change has not been included in the draft plan issued by the Chief Executive and is not recommended in this report.</p> <p>With respect to the possibility of the development of a multi-storey car park at the northern end of the grounds, the 'AOS' zoning attached to these lands would potentially allow for 'infrastructure and buildings'</p>	

associated with the sport use (and potentially for non-sport use when not needed by players / staff / spectators) on the bulk of the site if such a facility was deemed appropriate and necessary for the area. The issue raised in Submission C291 regarding linkages is not very clear, but a row of low rise retail buildings along the southern boundary of the Carlisle Grounds seems to be suggested that would form part of SLO-5. This suggestion is not supported on the basis that it would result in land take from the sports grounds, which is already limited and furthermore, there is already significant potential in SLO5, in particular because of the existing number of underutilised sites and buildings, to further develop the retail / commercial element in this area.

Seapoint Road to Quinsborough Road Walkway behind Carlisle Grounds

The issues raised with respect to the management of this route are noted and will be brought to the attention of the MD office to investigate.

Open Space

Quantity of open space

The open space provisions of the LAP are crafted on the basis of the Council 'play policy' which provides that 2.4ha of open space should be provided per 1,000 population. Having regard to the population target for the plan area (c. 45,000), this would equate to a need for c. 108ha of open space. In total the draft plan provides for 164ha²⁸ of open space. Furthermore, this figure does not include other significant recreational areas such as Bray Head, the Great and Little Sugarloafs, the grounds of Kilruddery, Knocksink Wood in Enniskerry, the Powerscourt Estate or the various Golf Clubs in the area. In these regards, it is considered that ample and significant provisions have been made for open space and recreation in the plan.

Community Gardens – allotments etc

It is not a normal requirement of the Planning Authority that the part of the open space permitted in new housing development is devoted to allotments or 'community gardens'. The space provided for in new housing areas is for the equal use of all residents, and is generally intended for recreational use and to hive off part of same for one group in society would not be equitable. However, it should be borne in mind that the garden sizes required in housing development is adequate to allow for individuals to 'grow their own' if so desired.

The development of community gardens or allotment would also be a permissible use on CE zoned lands and on unzoned lands near settlements. It should be noted that the County Development Plan adopts a proactive stance to the development of allotments on appropriate lands.

Glencourt – Giltspur: The lands concerning the submitter (C259) are effectively in 2 blocks; Block A is immediately south of the end of the cul-de-sac at Glencourt and Block B is south again, to the east of Giltspur Wood. These lands are both designated a 'RE' in the draft.

Block A

After further investigation into historical planning files, it has been determined that Block A is not part of the permitted development site for Glencourt. The lands are unregistered but do not form part of the Oldcourt House landholding. It is understood that they may be part of the larger landholding immediately to the west, that were formerly known as 'the nurseries'. There are no records of any planning permission on these lands.

In these circumstances, the RE zoning, on the basis that the land formed part of the permitted open space of Glencourt was erroneous. It is therefore recommended that the zoning revert back to the previous 'OS'.

²⁸ It is accepted that this includes 65ha OS2 ('passive' open space) that is not necessarily intended for active recreational use, but substantial parts of which still provide for outdoor amenity space (such as river banks, forests, etc).

Block B is part of the managed open space of Giltspur. It is the zoning protocol to zone such lands 'RE'; however the plan clearly states *'In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Non-community uses on such lands will not normally be permitted'* (CD5) and as such, no residential development is targeted for these lands. The perception that residential development is intended for these lands seems to form the entire basis for the submission.

It is considered that the change from OS to RE for the lands in question is essentially a correction – in previous Bray plans, some lands that formed part of the permitted open space of housing estates was zoned 'RE' and some was zoned 'OS' without any clear rationale for the differentiation. This appears to be now leading to a belief that the status of such OS lands was in fact different or enhanced, or was more 'protected' than the other open spaces in housing estates, when essentially it wasn't. In all recent and new plans, all residential open space is now shown as RE to avoid this anomaly and misperception continuing into the future.

With regard to the contribution these lands make to the Swan River Valley, its natural heritage and its biodiversity, these lands are an enclosed cleared, levelled and grass play area at the end of a cul-de-sac which are not considered to be functionally part of the natural river valley and its ecosystem.

Temple Vevay Sportsfield

The proposed change in zoning is from OS1 to AOS:

From: To protect and provide for recreation, open space and amenity provision.

To: To protect and enhance existing and provide for new active open space.

The OS1 zoning in the previous plan included sports grounds, Bray seafront, pockets parks, amenity woodlands and some residential open spaces. The change is simply a change in nomenclature which has no 'on the ground' or practical implications and would have no bearing on existing (legal) arrangements or agreements between owners / stakeholders/ users.

Dog Park, Skate Park

The primary purpose of a land use plan is to ensure that adequate lands are zoned / designated for the different uses that the existing residents and future resident may require. In this context, significant lands have been designated for open space and community use across the plan area, which would be suitable for a variety of users, such as sports users, dog walkers, skate boarders etc.

The actual development and management of such lands is an ongoing implementation and operational matter for both the MD team and the Council's Community, Cultural and Social Development department. These sections are working closely with various community groups to deliver new and enhanced open spaces that meet the demands of all in society. In this context, it is not considered necessary or appropriate to designate a particular area or site for a dog park or skate park through this plan, but rather, post adoption of the plan, to carry out further site identification and consultation exercises with the public to determine the best locations for such uses, if and when funding becomes available to deliver same.

Urban realm

Seating: Concern raised noted; this would not be a matter for a land use plan but it will be brought to the attention of the MD team for integration into any local urban realm improvements planned.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No. 4 , as detailed in Part II of this report (p19)
2. Amendment No. 21 , as detailed in Part II of this report (p50)

SECTION 3.12 TOURISM & RECREATION

This section of the report deals with the submissions that have been made with respect to Tourism and Recreation.

Sub No.	Name	Issues raised
C8	Ballywaltrim & Wingfield Residents Association	The Dargle River: It should be an objective of the plan to create a public footpath from the harbour, through the 'Lovers Leap' path to Powerscourt by means of a public access agreement with landowners.
C18	Bray & District Chamber of Commerce	<p>Tourism is a growth industry, employment intensive and brings consumers with disposable income to the town and the entire north Wicklow area. Currently tourism accounts for approximately 13% of the total employment in the Bray MD. This should be included as a 'Specialised Industry' with specific strategies similar to existing retail strategies in the plan. The LAP should consider zoning certain town centre and seafront sites for tourism related activity, in particular new hotels, hostels and camping/campervan sites. Sites that could be suitable include the old Arcadia Site, the Heitons Site, the former Dawson Site, the FCA property and the Dell property.</p> <p>As part of the Tourism Strategy we would request the following be included:</p> <ul style="list-style-type: none"> ▪ Encourage the redevelopment, regeneration and maintaining of facilities at Bray Harbour for maritime activities. ▪ Prioritise cycle ways and pedestrian walkways giving traffic free access to Powerscourt and Enniskerry and linking Bray with Kilruddery Estate and through the Estate (with the owner's permission) to the Little Sugarloaf and across the N11 to the Great Sugarloaf, Calary Commons etc. ▪ Ensure that old disused railway lines and sidings are kept development free to allow eventual creation of a Greenway modelled on Waterford from The People's park in Bray to Glendalough utilising the old railway lines, going via the Avoca valley and Shillelagh. ▪ Creation of a Greenway from Greystones Marina via Bray Seafront/ Harbour area to Dalkey - running adjacent to the railway line from Bray through Shankill Park, onwards to Killiney and Dalkey. ▪ Creating a maritime link from Dalkey Island running along the coast by the cliff walk to Greystones and the Greystones marina with activities such as sailing, fishing, canoeing, snorkelling etc. ▪ Upgrading the 'way finding', directional and street signage.
C182	Martello Terrace Bray Residents Association	<p>Need for More/Better Hotel Accommodation</p> <p>With some of our residents active in Bray's business community, we believe there to be a glaring need for at least one good, large, hotel and Bray as current hotels are either large and of very poor standard, too small for medium- to large- groups of guests or too noisy for business customers so much potential business for Bray is being lost to other towns like Dun Laoghaire. This serious gap is not mentioned in the draft Plan, but it should be rectified in the final version and a strategy identified to attract in an appropriate investor to undertake this project. The Bray Head Hotel, regrettably recently sold to a foreign fund, and clearly in need of considerable investment, would appear to us to have been a prime location for the sort of hotel which</p>

		Bray so badly needs and we wonder if it may still be an opening for its retention and serious upgrading into a prestigious hotel for Bray.
C296	Brigid O'Brien	<p>Turn Bray into a Blossom Destination. Cities and towns worldwide have become destinations to visit because of their strategic planting of Blossom Trees. Walkers, cyclists, families and all of us can share the beauty of season change in the company of deciduous trees. This would encourage wildlife, clean the air, enhance our town, soak up rainfall, and create a natural feel good factor. Public planting like this would encourage people to plant favourite trees in their own gardens.</p> <p>This town has a strong Arts history and community. Ardmore Studios, Bray Arts, Signal Community Arts Centre, Mermaid Arts Centre, BIFE, Abraxis Writers Group, Little Bray Writers Group, Outpost Studios, several Choirs, The Bray Music School, Ceoltas and more. There is a lot of Arts Activity. There is always somebody making music, sculpture, murals, stories, drawings and more. Many Writers and Artists live in Bray and Wicklow. It is worth considering if we should make more of this by considering ourselves an 'Arts Town'. As an identity badge it is a good fit.</p>

Opinion of Chief Executive

Walkway along the Dargle

Section 7.4 of the draft LAP recognises the Dargle as *"an important environmental and recreational amenity to the wider municipal district, providing opportunities for walking and fishing, as well as a partial link between Bray, Enniskerry and Powerscourt Estate"* and sets out that it is an objective to *"promote the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, through the development of a Dargle River Walk along the south bank of the river."*

Objectives for the harbour area in Section 7.2 also state that it is an objective to *'improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west.'*

At this time, the desired river walk only extends as far as Rehills land, as further west of this location the river has either steep sides or is inaccessible due to property boundaries. It is agreed however that continuing this route onwards towards Enniskerry and Powerscourt is a good longer term idea and in this regard, the draft plan has identified that there is an existing 'green corridor' (rather than a green 'route') along the Dargle which should be protected and enhanced.

Tourism strategy

It is acknowledge that tourism is a growing industry with an important role in providing employment and bringing income to an area. The draft LAP in conjunction with the County Development Plan aims to promote and facilitate the development of sustainable tourism and recreation and both documents set out objectives to deal with land use matters pertaining to the planning and development of the tourism sector. It is not within the remit of a LAP to provide a tourism strategy however as a land use plan the LAP's objectives have been prepared in line with existing national, regional and local tourism strategies (such as the NSS, RPG, Fáilte Ireland (Ireland's Ancient East), LECP, Wicklow County Tourism, Bray Tourism, Wicklow Outdoor Recreation Strategy, etc).

Tourism initiatives

The following issues are sought to be included in the LAP's tourism strategy, however the LAP, and the County Development Plan, facilitates the development of all of these issues from a land use planning point of view:

- Encourage the redevelopment, regeneration and maintaining of facilities at Bray Harbour for maritime activities.
 - LAP Section 7.1 '**Bray Seafront & Esplanade**' – *"to promote the seafront area as the primary tourist, leisure and recreational centre of the town"*
 - **Bray Seafront** zoning objective *"To provide for the development and improvement of appropriate seafront uses - To protect and enhance the character of the seafront area and to provide for mixed-use development including appropriate tourism, retail, leisure, civic and residential uses. The Seafront area shall be promoted as the primary tourist, recreational and leisure centre of Bray."*
 - LAP Section 7.2 '**Bray Harbour**' – *"As a stakeholder in this area, it is objective of the Council to prepare a masterplan for the area in consultation with property owners which addresses the following objectives:*
 - *To encourage and facilitate the redevelopment of vacant or underutilised properties / lands for a range of uses, serving to both harbour users and the wider public including shops (particularly those relating to recreational use of the area e.g. sailing / fishing equipment, boat / canoe hire etc), boat/marine services, restaurants / cafes, clubs, community facilities etc;*
 - *To encourage the development of residential uses in the area above commercial / community ground floors;*
 - *Given the small land bank available, to encourage intensive and high density redevelopment and to encourage the development of higher buildings, with particular regard being taken of the historical and residential amenities of the area and especially Martello Terrace;*
 - *To encourage more intensive use of the harbour for recreational use, to enhance harbour infrastructure and to consider the development of water-side marina infrastructure;*
 - *To improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west."*

- Prioritise cycle ways and pedestrian walkways giving traffic free access to Powerscourt and Enniskerry and linking Bray with Kilruddery Estate and through the Estate (with the owner's permission) to the Little Sugarloaf and across the N11 to the Great Sugarloaf, Calary Commons etc.
 - LAP Section 8.1.3 '**Cycling and Walking**' – objective CW1 - *"To improve existing or provide new foot and cycleways on existing public roads, as funding allows and to facilitate the development of a cycling and walking amenity routes throughout the District including foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination (be that town centre, schools, community facilities or transport nodes), while ensuring that personal safety, particularly at night time, is of the utmost priority"*
 - Objective RO9 *"To promote and support the development of enhanced or new greenways at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links: - Bray - Dargle River south bank - Bray – North Beach – Ravenswell – People's Park - Bray Head – Esplanade – Bray Harbour – North Beach - Bray - Swan River Kilruddery to Dargle River - Dargle River to Herbert Road via woodland - Fassaroe - Ballyman Glen to Cookstown River - Kilmacanogue River - Enniskerry – Glencullen River - Cookstown River - San Souci Wood / Vevay Crescent - San Souci Wood – Sidmonton Gardens, with links to St. Cronan's, St. Patricks and St. Thomas's school sites and Novara Avenue / Sidmonton Road.*

- Ensure that old disused railway lines and sidings are kept development free to allow eventual creation of a Greenway modelled on Waterford from The People's Park in Bray to Glendalough utilising the old railway lines, going via the Avoca valley and Shillelagh.
 - **CDP Objective BH24:** *To facilitate future community initiatives to increase access to and*

appreciation of railway heritage, through preserving the routes of former lines free from development.

- CDP **Objective T29** *"To support the development of new and existing walking, cycling and driving routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties."*
 - There are no disused railways lines in the Bray MD area but a previously partially developed route along the south bank of the Dargle from the harbour to Bray Bridge is now a public walkway, recently improved by the Council. This route, which was never fully developed, would have continued along the south bank of the river towards Enniskerry, and this area is now earmarked for the Dargle River Walk.
 - The train line from Bray towards Avoca – Arklow is operational and therefore no greenway would be possible, but the abandoned route from Woodenbridge to Shillelagh is the subject on ongoing investment and development by both the Council and the NTA. Parts of the greenway are already in place and are well used. It is agreed that further investment should be made to develop same.
 - There is no disused rail route in the Glendalough area.
- Creation of a Greenway from Greystones Marina via Bray Seafront/ Harbour area to Dalkey - running adjacent to the railway line from Bray through Shankill Park, onwards to Killiney and Dalkey.
 - The 'Cliff walk' already links Greystones marina to Bray. The LAP objectives aim to continue this route northwards through Bray harbour onto the north beach. It would be an excellent amenity if such a route could be connected onwards into Dublin. The development of such a greenway is facilitated with the general objectives of the County Development Plan and LAP (outlined above). It is also an objective of the County Wicklow Economic Think Tank Strategic to *"Maximise the value of Wicklow's status as "The Garden County" and to "Promote and develop 'greenway projects."* An objective seeking the provision of an inter-county greenway may be better suited to the Regional Plan, and it is understood that the Regional Authority is looking at including a regional GI strategy in the next Regional Plan.
 - Creating a maritime link from Dalkey Island running along the coast by the cliff walk to Greystones and the Greystones marina with activities such as sailing, fishing, canoeing, snorkelling etc.
 - The County Development Plan and this LAP have no remit over maritime activities, but the plans certainly support the development of the 'land side' infrastructure needed to support such activities. County Wicklow's Tourism Strategy and Works Programme 2017 – 2022 has a key ambition to *"Seek to develop the maritime sector in the Region for commerce and tourism, including the development of marinas."*
 - Upgrading the 'way finding', directional and street signage.
 - The County Development Plan seeks to *"T25 To cooperate with Wicklow County Tourism, Bord Fáilte and other appropriate bodies in facilitating the development and erection of standardised and branded signage for tourism facilities and tourist attractions"*. The upgrading of such signage is a matter for the tourism bodies and providers.
 - Blossom destination
 - This proposal to turn Bray into a Blossom destination is an excellent suggestion however such an initiative would not sit within the remit of a Local Area Plan and it is more matter for County Tourism and Fáilte Ireland.

Zoning for tourism accommodation

Objective T11 of the County Development Plan seeks to *"To positively consider the development of new hotels in all parts of the County, with particular preference for locations in larger settlements (Levels 1-6 of*

the County settlement hierarchy)...." This includes the settlements of Bray, Enniskerry and Kilmacanogue.

Objective T10 seeks *"To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County."* There are also other objectives facilitating the development of B&B's, holiday homes, hostels and caravan & camping sites. There are limited tourism specific zonings within the LAP however tourism accommodation is an appropriate use all Residential, Town Centre, Bray Seafront, Tourism, 'Kilruddery Demesne Conservation and Tourism', some Mixed Use zones and the Primary Development Zone. The actual delivery of tourism accommodation is a matter for the land owner.

Recommendation

No change

Landscape

Sub No.	Name	Issues raised
C118	A. Ffrench	<p>It is suggested that the plan includes a new objective 'KD - Kilruddery Demesne':</p> <p><i>"WCC to support, facilitate and develop a comprehensive Landscape Estate Masterplan - in full collaboration with the landowner, local community and other key statutory and non-statutory stakeholders for the future (2018-2028), sustainable development of the entire landholding (core estate, Little Sugar Loaf and Bray Head)".</i></p> <p>The Masterplan would be a sub-threshold, non-statutory Framework Plan, demonstrating authentic partnership between landowner, community and planning authority; building consensus aimed at stewarding the estate in a successful economic and social future.</p> <p>There is precedent for such an initiative: the Kilruddery landowners – the Brabazon family – commissioned a more modest development plan by Murray O'Laoire Urban Designers approximately 10 years ago. The Guidelines and Manual for LAPs also provide useful advice and mechanisms for such a progressive approach.</p>

Opinion of Chief Executive

Kilruddery as a private estate is being managed by the Brabazon family. They may well already have a 'non statutory' estate 'masterplan' which guides the estate's development, which indeed is suggested by their own submission. The Council would fully support any 'estate masterplan' that the landowners may wish to develop subject to same complying with the provision of the LAP and the County Development Plan e.g.

AH5 *"To maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts of the setting and character of the demesne."*

Section 7.5: *"Kilruddery House & Gardens are a major tourism and recreation asset to the wider Bray area, and draw significant number of visitors to both the house, gardens and regular markets but also to events such as concerts, endurance races and adventure / sport activities. It is the objective of the Council to:*

- *Support and facilitate appropriate use of the estate for tourism and recreation purposes, mindful of the impacts that can arise from sporadic intensive use, in particular impacts on neighbouring residences and traffic flows in the area;*

- Allow for some additional development of the estate in order to support the ongoing viability of the estate;
- To require further development of the estate to make provision for significant public open spaces and sports grounds, linking to surrounding areas and to the Bray SCR.

SLO1: *The lands immediately surrounding the house and garden are zoned in this plan 'Kilruddery Demesne Conservation and Tourism Zone' and this mixed use type zoning extends to the entire house and gardens, not just a limited area to the north. Notwithstanding this change in zoning, the priority in this area remains the protection and conservation of this valuable heritage asset. The types of uses that will be considered in this area will not be prescribed but rather any development that is considered to enhance the conservation and tourism offer of the area will be considered open for consideration. Only those projects which show a direct link to enhancement of the estate and its visitor product will be considered for permission.*

KD zoning: *To protect and enhance the distinctive historical character, setting and amenity value of Kilruddery Demesne and provide for appropriate and sympathetic conservation, amenity, tourism and community uses that enhance awareness, appreciation and accessibility of the area and to resist development that would detract from its integrity and setting.*

It is therefore not considered necessary to make the preparation of such an 'estate masterplan' an objective of this plan.

Recommendation

No change

SECTION 3.13 HARBOUR & SEAFRONT

This section of the report deals with the submissions that have been made with respect to the Harbour and Seafront.

Sub No.	Issues raised
<p>C8 Ballywaltrim & Wingfield Residents Association</p>	<ul style="list-style-type: none"> ▪ Objectives for the OS1 zoned area should include a prohibition on temporary commercial activities on the beach east of the esplanade, as happened recently. ▪ Bray has the potential to become the Adventure Activity Centre for the east coast, given the range of existing activities that are catered for and the potential for the development of new facilities. ▪ Bray Harbour is the 'jewel in the crown' in this regard, especial in relation to water sports. ▪ The current use and potential of the harbour is restricted by the silting up of the harbour and its vulnerability to north east storms, which has caused damage to boats and facilities in the past. ▪ These issues need to be addressed in any Bray Harbour Management Plan which should involve all stakeholders using the harbour. ▪ In particular there is certain 'vagueness' in relation to access to the harbour. The current work on the cycleway through the harbour area has restricted access and parking and has made the road entrance to the harbour more dangerous. The plan needs to specifically rule out road traffic access, other than cycles, through the harbour from the north Bray development. Vehicle traffic would destroy the amenity values of the harbour, prevent the development of recreational activities and be a danger to the many hundreds of children that use the harbour every year.
<p>C18 Bray & district Chamber of Commerce</p>	<p>As part of the Tourism Strategy we would request the following be included:</p> <ul style="list-style-type: none"> ▪ Encourage the redevelopment, regeneration and maintaining of facilities at Bray Harbour for maritime activities.
<p>C19 Bray Harbour Action Group</p>	<p>Bray Harbour Action Group is a group representing all of the water-based users of Bray Harbour. The group was established in 2016 as a result of the concerns of many harbour users about the deterioration of Bray Harbour and the very real prospect that this valuable resource would decline further to the extent that it would become completely unusable for any form of water-based activity.</p> <p>BHAG is concerned that the water-side facilities in Bray have been abandoned completely in recent times and that the harbour has received no attention from Wicklow County Council in many years.</p> <p>BHAG notes and welcome that Section 7.2 of the draft LAP says that <i>"There is potential for redevelopment on both sides of the river, to create a more active, thriving harbour area that capitalises on its location adjoining the Bray promenade, the sea and river, to become a destination for visitors in its own right, as well as a hub for water based sporting and community activities".</i> BHAG member organisations will support any efforts to achieve this aspiration.</p> <p>BHAG is extremely concerned, however, that there has been discussion aired recently in some quarters about the possibility of using the harbour area as a thoroughfare to provide access to the seafront for south-bound traffic from the former golf club lands and note that Section 7.2 also has as an objective <i>"To improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west."</i></p>

	<p>BHAG feel that even giving consideration to using the harbour area as a roadway rather than a destination for water users shows a complete lack of understanding of the level and type of activity which takes place on a daily basis. Three of the member organisations alone (Bray Youthreach, Bray Sea Scouts, and Bray Sailing Club) have approximately 750 children taking part in activities in Bray Harbour and the waters nearby. All of these, without exception, have to navigate the roadway to launch and retrieve boats, skiffs, and kayaks and the prospect of doing this safely if the harbour has a through road running through it does not even bear thinking about. BHAG would encourage anyone who disagrees to visit the harbour on a busy Saturday or Sunday in the middle of the summer.</p> <p>While BHAG recognises that Bray faces significant traffic issues, due to the limited number of access routes and river crossing points, BHAG feels that using the harbour as a partial solution to this problem is absolutely incompatible with the objective of creating <i>"a more active, thriving harbour area that capitalises on its location adjoining the Bray promenade, the sea and river, to become a destination for visitors in its own right, as well as a hub for water based sporting and community activities"</i>. BHAG is of the opinion that the implementation of any such proposal would be the final death knell for water sports in Bray. Therefore, BHAG asks that this paragraph be amended to reflect the prioritisation of access to the water and that any suggestions of using the harbour as a through road be abandoned forthwith.</p>
<p>C20 Bray Harbour Mooring Holders Association Ltd</p>	<p>BHMHA Ltd has had sight of a submission by Bray Harbour Action Group - a group representing all of the water-based users of Bray Harbour including BHMHA Ltd. BHMHA agrees with all of the sentiments expressed in the BHAG submission.</p> <p>In addition, BHMHA would like to see long-term parking facilities or favourable parking charges for its members as, due to the tidal conditions within the harbour, boat owners and crews are regularly away from the harbour for 8+ hours. BHMHA members do however require access to our vehicles to load and unload gear as appropriate before/after all water based activities.</p>
<p>C22 Bray Sailing Club</p>	<p>BSC wishes to comment on Section "7.2 The Harbour" of the <i>"Draft Bray Municipal District Local Area Plan 2017 – Written Statement"</i>. BSC welcomes the tenor and content of the section in general however has serious concerns regarding the final bullet point in the section – i.e. <i>"To improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west."</i></p> <p>BSC recognises the need for improvements in road, pedestrian and cyclist infrastructure in the area. BSC would also welcome linkages to the north beach, the seafront, the Dargle River walk and the former gold course lands for cyclists and pedestrians. However, we are strongly opposed to the potential development of through road access through the harbour area for vehicular traffic. The current wording neither states this as its intent but leaves open that possibility in future interpretations of the plan. It is important this is addressed explicitly as it is a matter that has been discussed publicly in recent times, including within the council chambers of Bray Municipal District. It is a topic BSC believes likely to be promoted again in the lifetime of this plan as the golf course lands are developed.</p> <p>Creation of a through road through the harbour area would be strongly detrimental to the development of the harbour to meet the objectives listed in the remainder of section 7.2. Current usage by clubs and community would be put in severe jeopardy. The sailing club depends on access to the harbour across the current roadway when launching dinghies, rescue boats and other vessels. In peak summer months, BSC has up to 60 children each day under instruction in the harbour, unavoidably crossing the road and operating close to it on</p>

	<p>the beach area within the harbour. A busy roadway would create enormous difficulties in our operations through the unavoidable risks it would pose. Other voluntary and commercial organisations would be similarly affected, including the Sea Scouts, the Fishing Clubs, canoe hire operators as would casual harbour users out for a stroll or feeding the swans.</p> <p>We therefore ask for this paragraph to be amended so that a through road is not advocated by this plan – nor could it the plan be interpreted in that way. While it may be appropriate to have an objective <i>“To improve road and pedestrian / cyclist infrastructure in the area”</i>, we believe the reference to <i>“linkages”</i> should be separately stated as an objective and constrained to pedestrians and cyclists – i.e. <i>“To improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west for cyclists and pedestrians”</i>.</p>
<p>C23 Bray Sea Scouts</p>	<p>BSS wish to comment on section “7 Tourism and Recreation” and in particular “7.2 The Harbour” of the “Draft Bray and Municipal District Local Area Plan 2017-Written Statement”.</p> <p>BSS is a scout group located in Bray Harbour since 1965, which now comprises 350 youth and adult members ranging in age from 6 to 80 years of age. BSS meets weekly year round in premises built on the site of the former Dock Terrace. Their boating program includes use of the harbour and surrounding bay by various sections on 5 nights every week, and at the weekend. BSS stores boats in their Den, which backs onto the railway line, and transport them across the road to reach the water. The scouts moving these boats range in age from 9 years to 18 years of age. Given their reputation in the community they are heavily over-subscribed: their waiting list presently runs to 700. BSS therefore consider themselves a stakeholder in the Harbour.</p> <p>BSS welcomes the statements in the section, in particular the acknowledgement of the importance of community and recreational assets to the town. BSS notes the importance of the Victorian seafront, but would point out that the Harbour itself is also Victorian, though built as an industrial rather than residential area. BSS also would like to see the Harbour become more active, and improve its recreational and touristic value to the community.</p> <p>BSS concerns relate to the objective: <i>“to improve road and pedestrian/cyclist infrastructure in the area and in particular to improve/provide linkages to the north beach, the seafront, the Dargle River walk and the former golf club lands to the west”</i></p> <p>BSS are pleased with the recent works in the Harbour which will provide footpaths and cycle tracks in the area.</p> <p>BSS would not and cannot support the development of a through road with increased vehicular traffic through the area. This would damage the amenity value of the harbour and its access to the water. It would render the transport of all boats to the water more dangerous to the scouts. It would also make it extremely difficult to transport some of their larger boats: 2 East Coast skiffs are 29 feet long and are pulled by hand, the rib requires a jeep to pull it on its trailer.</p> <p>Other regular and casual Harbour users will be similarly affected: be they fishermen trying to launch their boats, sailors, walkers, or children down to feed the swans.</p> <p>BSS would therefore ask for this paragraph to be amended so that a through road is neither advocated nor can be inferred in the future. BSS suggest this amendment:</p>

	<i>"To improve/provide linkages to the north beach, the seafront, Dargle River walk and the former golf course lands for cyclists and pedestrians."</i>
C66 T. Cookson	Bray Harbour is an area of huge heritage value - it should be preserved as it is as much as possible and there should be no major building project here. If there are to be any buildings built on the side where there are now currently some warehouses, this must be done with the utmost sensitivity and should be low rise and not have a big visual impact on this beautiful old harbour - perhaps a few restaurant spaces with housing only at the back with no visual intrusion on the harbour. The harbour is also, perhaps first and foremost, an important nature preserve for birds and it should be protected as such. Nothing should be done that will disturb that environment for the birds who call this their home.
C182 Residents of Martello Terrace	<p>General</p> <p>Residents of Martello Terrace welcome the emphasis placed in the draft plan on preserving and enhancing the historic and architectural heritage of the Bray's unique Seafront, its special tourism amenity character and its natural environment, whilst seeking to generate additional tourism numbers, facilities, services and business. They very much agree that all future development in this area must harmonize with the existing historical and architectural heritage of the Seafront and the roads around it, including a prohibition on buildings of more than 4 storeys, other forms of building incompatible with the Seafront's heritage, style and character, and an insistence on maintaining the current frontage line set back from the road. They welcome the assurances set out in the Plan that <i>'additional new development will not be permitted on land zoned as OS1 on the east side of the Strand Road from Martello Terrace to Bray Head'</i> on the Seafront (page 39). They feel it important also that temporary events taking place in this area are stringently controlled to prevent damage to this key amenity area (like cutting away part of the heritage railings on the promenade as one such event did a couple of years ago), noise and interference with the residential character of much of the Seafront.</p> <p>Traffic & Parking</p> <p>It is clear to residents of Martello Terrace, as it must be for the Council also, that the single most serious problem facing Bray Seafront and the Harbour area is traffic and parking but this is almost completely ignored in the Draft Plan and in no way addressed. This problem, which has been mounting steadily and which will only worsen further with time is impacting very negatively on both residents and visitors and contributing to environmental pollution and degradation. There are insufficient designated parking spaces on the Seafront to cater for even daily demand - the result of which is cars crawling along looking for spaces, backing up, trying to turn around, double-parking, parking on double-yellow lines and in other unauthorised places, including sometimes on our Terrace. At weekends and in the summer months in particular, queues involving hundreds of cars stream down over many hours onto the Seafront, principally from Seapoint Road, and out again in the late afternoon/evening, clogging up the whole stretch from the top of Seapoint Road to the far end of the Seafront, with the whole Harbour area equally clogged and congested. Even if all the entire grassy esplanade was dug up to make way for parking (which of course would be unacceptable and unthinkable), this would not solve the problem.</p> <p>It is clear to us, therefore, as it should be to the Council, that the current parking and traffic problems can only be resolved by a long-term, sustainable strategy to divert all but local residential and commercial vehicular traffic away from the Seafront and Harbour areas and accommodate them elsewhere. Martello Terrace residents call for the urgent development of a traffic management strategy to be set in motion without delay, in consultation with local residents and businesses, which will involve restricting vehicular access to the Seafront and</p>

Harbour zones to local residential and commercial traffic and the new school shuttle buses, adequate parking away from this whole area, a system of mobile electronic signage to direct vehicular traffic to alternative streets and parking areas, ideally some kind of shuttle transportation from public transport and car-parks to the seaside areas, strong encouragement of the use of public transport and prioritization of pedestrians and cyclists in these zones. Substantially increased fees for parking on the Seafront should also be introduced, both to reduce the level of traffic aiming to park there and to generate income that could be used, for example, to fund mobile electronic road signs, which we understand to be costly.

Terrace residents have noted and very much commend the planning and management of arrangements for the Bray Air Display over the last couple of years and, whilst understanding that an operation of this scale cannot be mounted every day, nevertheless feel strongly that the fundamentals of this approach should constitute the basis of a sustainable traffic management plan for the Seafront and Harbour areas and this should be an urgent priority for the next few years. It is vital that the new Bray Development Plan includes an effective traffic management strategy of this kind and that planning in this regard begin without delay in consultation with local residents and businesses, including the residents of Martello Terrace.

Interim Road/Traffic Management Measures

In the short term and by way of interim measures to alleviate the serious congestion which so often arises at the northern end of the Seafront along our Terrace's western boundary, especially with traffic coming from and to Seapoint Road, and the very dangerous conditions which currently exist from under the railway narrow bridge and around the sharp bend, Martello Terrace residents wish to see some urgent easing of traffic problems on the roads adjacent to our Terrace, which have long been dangerous and often congested, problems which are going to be seriously aggravated by the current road-works which have added a (welcome) double-lane bicycle path to the stretch of road along the railings on the western perimeter of our Terrace, but which have also narrowed the road for motor traffic, increased the sharpness and blindness of the curve on that part of the road, and necessitated the narrowing-in of the road to one lane - with a two-way 'Yield' sign - in the vicinity of the south gate and the entrance to/exit from the Seafront's southern car-park, which will cause even further traffic chaos if it is introduced. As alternative to the plan to insert this narrowing-in point on this part of the road at this point, Terrace residents believe that a better option is probably to introduce a one-way traffic system for all but local residential and business traffic and the new schools shuttle bus, at least on the stretch on Seapoint Road from Seymour Road to the southern Seafront car-park or even Quinnsborough Road to the south, and the Harbour to the north, in whichever direction is felt best by the expert road engineers of the Town and County. Residents of Martello Terrace call on the Council to draw call on the technical expertise available to it to explore this formal proposal from our residents without delay and to provide feedback to us on these as soon as possible.

Even with a one-way system introduced on Seapoint Road or part of it and on the northern-most end of the Seafront, clear road signage is needed around on both ends of the bend linking these two stretched of road to a) indicate a dangerous bend ahead; b) a narrowing of the road and c) a need to greatly reduce speed, even if some form of speed-bumps are introduced.

Finally, with a view to preventing blocking of the exit and entrance to the Terrace when the traffic flow is heavy as happens very frequently, and to ensure access for emergency vehicles

should the need arise, it is essential that a 'yellow box' is marked out on the road outside both western and southern gates respectively, with a third one also necessary at the back entrance gate of the Terrace, behind No. 8 on the Terrace on the Harbour road (behind No. 8 on the Terrace) - this was there previously but with road-works it has disappeared.

[Note, we will be sending a separate submission to the Town and County Road Engineers expanding in greater detail and with photographs on our proposals regarding the ongoing road-works adjacent to our Terrace and the issue of Seafront traffic/parking more generally.]

Bray Harbour

General

As regards the Harbour area, and the vision set out in Sections 7.2 (pages 39/40) and Specific Local Objectives (SLO3) Section (pages 63/64), Martello Terrace residents welcome the fact that the draft Plan specifically references Martello Terrace, states that planning for development in the Harbour area will take place in consultation with property owners and *'with particular regard being taken of the historical and residential amenities of the area and especially Martello Terrace'* (page 40). We residents of the Terrace will be more than happy to be involved in the consultative and planning processes and are very much seeking such a role.

We are supportive of plans for appropriate and sensitive developments of this area, with a view in particular to enhancing its attraction for sport, exercise, recreation and ancillary services/ commercial opportunities, as envisaged in the draft Plan. For us it is vital, above all else, that the immediate area of the Harbour remains a public amenity with free access for all to all parts of it. Under no circumstances would we wish to see, nor would we accept, a development of the harbour area along the lines on Greystones which, despite a small amount of green landscaping, has been turned into a concrete jungle, its waters hardly visible any more, and with little public access now possible - this town's heritage basically just sold off for private development and occupation, which we cannot let happen in Bray.

We are puzzled, however, and deeply concerned that the plan/map on page 63 demarcates for development in the Harbour area Bray Sailing Club and the Harbour Stores, both immediately behind our Terrace, along with the premises along Dock Terrace, and even the road there itself and the two piers of the harbour, which we do not feel to be appropriate. We believe this may be an error as much of this area is private property, but we would welcome some explanation of what is going on here. Planning guidance for this specific area may be a good idea for formal designation for development is not. This area should not be targeted for anything other than enhancement, not for any radical development, and the pedestrian public access routes around all sides of the harbour must be retained.

Harbour-Seafront Link for Future Planning Purposes

As essentially an extension of the Seafront area, and completely different in character and needs from the old Golf Club site, we are strongly of the view that development planning for the Harbour area must logically be linked and zoned with the Seafront, with the latter development criteria applied to it, and not with the development of the old Golf course where different objectives and criteria can legitimately apply - and which is in any case largely cut off from the Harbour by the railway track.

In the main body of the draft Plan (pages 38/39), the Harbour area is quite correctly covered as an individual zone but then, rather inexplicably, in the SLO3 Section and Map (pages 63/64) it is lumped together with the development of the old Golf Course and this, our residents, feel strongly, is not appropriate.

The Harbour is a special and unique feature and attraction of the town, part of the town's seaside heritage and environment and as such, for future planning purposes, it should be

	<p>treated separately from the Golf Course and as an extension of the Seafront. Following on from that, forward planning for the Harbour area should be in line with that for the Seafront and the development criteria set out for it. While a case may be made for intensive residential and commercial development for parts of the Golf Course site, including buildings higher than the 4-storey limit applicable to the Seafront, our Terrace Residents do not support intensive or high development of the Harbour area. While some residential and commercial development may be appropriate, even welcome, on the industrial site immediately to the north of the harbour, we would very vociferously oppose this being any higher than 4 levels high - this is not an appropriate location for a Costa Brava Mark 2.</p> <p>Harbour Dredging/Removal of Previous Sewage Outlet Pipe Dredging of the Harbour will be essential to maintain and develop boating and related recreational activities and ancillary services and businesses and it is the hope of our residents that the dredging exercise will also involve the removal of the badly-placed outlet pipe through the harbour from the previous sewage works, which has greatly affected the yachting and boating sector in the harbour and, with that, the development of the full amenity potential of this beautiful area. With the redirection of Bray sewage to Shankill, residents of Martello Terrace hope that it will now be possible for the old sewage pipe outlet through the harbour can and will be removed to facilitate use by larger and more numerous craft.</p> <p>Harbour-Riverside Boardwalk Connectors One last but important proposal which our Terrace residents wish to put forward in relation to the Harbour area is for the very welcome new walkways on both sides of the Dargle river to be extended eastwards to connect to the harbour area, which would undoubtedly greatly enhance the recreational value of the area, its attraction for visitors and its commercial potential. We would much appreciate it if the Council could provide some feedback to us regarding this proposal.</p>
<p>C261 M. Rogers</p>	<p>Bray Harbour is an area of huge heritage value - it should be preserved as it is as much as possible and there should be no major building project here. If there are to be any buildings built on the side where there are now currently some warehouses, this must be done with the utmost sensitivity and should be low rise and not have a big visual impact on this beautiful old harbour - perhaps a few restaurant spaces with housing only at the back with no visual intrusion on the harbour. The harbour is also, perhaps first and foremost, an important nature preserve for birds and it should be protected as such. Nothing should be done that will disturb that environment for the birds who call this their home.</p>
<p>C268 T. Stewart</p>	<p>If the Dawson's amusement site is to be developed, there must be an equal amount of parking provided as currently exists on that site.</p>
<p>C291 K. Wolahan</p>	<p>Consideration should be given to the visual appearance of the seafront area immediately opposite the level crossing, to complement the Gateway & Transport Hub objectives in this area. This is the most prominent portion of the Seafront visible upon arrival via either the Gateway & Transport Hub, or by car and particular attention should be given to the visual impact of this area. The area would be served with the erection of a sculpture that would be emblematic of Bray. The grassed area has potential for a paved, soft /hard landscaped urban park adjacent to the car-park that could be used by the visitor. Currently, this area has been maintained as a rough grassed field, but would of particular use if it were developed to complement seafront uses.</p>

Opinion of Chief Executive

Objectives for Bray Harbour

It is agreed with many of the submitters that Bray Harbour has suffered from lack of investment but has much potential for regeneration and redevelopment in particular to provide for more intensive and wide ranging amenity and recreational purposes. In this regard, as a major stakeholder in the area, the Council is committed to preparing an overarching strategy for the area, in consultation with other landowners and harbour users, and this process has already commenced. The objectives in the plan for the harbour clearly set out the Council's visions and aspiration for the harbour thus:

7.2 Bray Harbour

This mixed use area measures c. 3.3ha including the harbour walls. To the north side of the river, between the railway line and the beach there is a land block of c. 1.75ha currently occupied by a number of older industrial buildings in various states of usage; to the south of the river, there is a land parcel of c. 1.1ha (including public roads and open harbour areas) which is in variety of uses including a public house, café, Scouts den, Bray boxing club, a number of boat yards and services, sea anglers club and Bray sailing club. The two areas are joined by a single carriageway road bridge. Wicklow County Council owns land in this area as well as being the custodian of the harbour and the public roads in the area.

There is potential for redevelopment on both sides of the river, to create a more active, thriving harbour area that capitalises on its location adjoining the Bray promenade, the sea and river, to become a destination for visitors in its own right, as well as a hub for water based sporting and community activities.

As a stakeholder in this area, it is objective of the Council to prepare a masterplan for the area in consultation with property owners which addresses the following objectives:

- *To encourage and facilitate the redevelopment of vacant or underutilised properties / lands for a range of uses, serving to both harbour users and the wider public including shops (particularly those relating to recreational use of the area e.g. sailing / fishing equipment, boat / canoe hire etc), boat/marine services, restaurants / cafes, clubs, community facilities etc;*
- *To encourage the development of residential uses in the area above commercial / community ground floors;*
- *Given the small land bank available, to encourage intensive and high density redevelopment and to encourage the development of higher buildings, with particular regard being taken of the historical and residential amenities of the area and especially Martello Terrace;*
- *To encourage more intensive use of the harbour for recreational use, to enhance harbour infrastructure and to consider the development of water-side marina infrastructure;*
- *To improve road and pedestrian / cyclist infrastructure in the area and in particular to improve / provide linkages to the north beach, the seafront, the Dargle River walk and the former golf course lands to the west.*

Design of new harbour development

The design of any new development will be required to accord with the highest design and environmental standards, in accordance with the provisions of the County Development Plan, the various design guides produced by the Minister, environmental legislation and best practice. The impact of any new development of existing residents and the natural environment will of course be paramount in the development of design for new development in this area.

Road access at Harbour

Road access through the harbour and to the north quay is essential to be retained as there are many community and commercial activities in operation on both sides of the river which require vehicular access and therefore the suggestion of removing all vehicular traffic would not be feasible.

Furthermore, it is considered that the northern side of the river has potential for redevelopment for community / commercial / residential use, perhaps bringing new clubs, water sport related businesses, shops, eateries etc to the north key and access would be necessary for such uses.

There is currently no public road access from the golf club lands to the harbour area - a low underpass exists under the railway line, and at this time, this is only useable for school transport and service vehicles and pedestrian / cyclists. Providing a public 'through road' from the golf course development to the harbour is not a specific objective of this plan and was not a component of the permitted golf course development – an alternative bridge to the west of the railway line was the transport link between the golf course and the station / seafront area.

It is considered essential however that permeability around the town is maintained and enhanced and this is particularly so for major new development areas, such as the golf course. In this regard, the draft plan states that in the development of the golf course:

'Excellent linkages shall be provided from the site to surrounding areas; multiple access points for both vehicles and cyclists / pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray seafront / the DART station and public walking route along the river;

It should be noted that this objective does not specifically require that such 'linkages' include a vehicular route between the golf course and the harbour; however it is considered that all options for vehicular, pedestrian and cyclist movement in the area should be investigated as part of the harbour masterplan and the potential redesign of the golf course development processes. The eventual routes for all of the desired 'linkages' be they vehicular, tram, pedestrian or cyclist would be subject to a consent process, during which public participation would be involved, and in that manner, those concerned about adverse impacts can participate in the decision making process.

Seafront development and activities

Note: Some of the issues raised under this heading are covered by the annual budgetary programme, or the capital programme, of Wicklow County Council. The Local Area Plan deals with strategic land use issues only, that inform the future development of the area concerned. However, answers are given below to these issues, but are not relevant to this particular Local Area Plan process.

It is suggested in C291 that visual improvement of the area opposite the level crossing is required. It should be noted that the Council has invested significantly in this area over the last number of years and has carried out substantial improvements to the 'urban realm' and appearance of this area including road and footpath improvements, development of cycling facilities, enhanced paving and pedestrian crossing, repaired Victorian railings, new lighting as well as landscaping and tree planting.

Temporary commercial activities / events: Being the custodians of the seafront area, the Council may permit temporary activities, such as the annual Summerfest. It is unclear if these are the type of activities that some submitters are concerned with. However, if activities occur without the requisite consent / permission, the Council is empowered to take action as necessary and is committed to doing so.

The LAP cannot 'control' unauthorised uses – it has no 'power' to stop such activity occurring and the appropriate tool for dealing with such incidences is the Planning Enforcement system. The Wicklow County Development Plan clearly states:

"Development will be controlled in accordance with policies and objectives set out in the County Development Plan and in accordance with the principles of proper planning and sustainable development.

With regard to the enforcement provisions of Part VIII of the Planning and Development Act 2000, the role of the planning authority is to undertake enforcement action where necessary with respect to non-compliance with conditions attached to planning permissions and the carrying out of non exempted development without the benefit

of planning permission. Furthermore the planning authority has special control powers under current legislation pertaining to such areas as protected structures and tree preservation orders".

Pedestrian / cycle links in area

Wicklow County Council has and will continue to invest in walking and cycling infrastructure in the harbour and seafront area, in accordance with the overall Cycle Network plan for the settlement. All works undertaken have been designed to the highest engineering and safety standards and are designed with the pedestrians and cyclists in mind, which may discommode some car users, but in the longer term will bring wider societal benefits.

With respect to Harbour-Riverside boardwalk connectors, it is planned that this will be a matter investigated in the development of the harbour masterplan.

Traffic and car parking

The plan is criticised for not addressing traffic congestion issues at the seafront and harbour but it must be borne in mind that a Local Area Plan is a land use framework and not a traffic management strategy. The Council is constantly looking at ways of improving traffic flows in the town and is also working closely with the infrastructure agencies and providers to address traffic and movement issues in Bray and in particular, to find ways to encourage people visiting the seafront and harbour to do so by public transport²⁹. It is agreed that the provision of additional car parking is not the solution to traffic congestion as enhanced private car parking would only have the effect of drawing more cars into the area. The converse is in fact true – if it is made more difficult to park on the seafront, public transport or travel by foot / bike will become more attractive.

This must also however be balanced with the desire to maintain and sustainably increase visitor numbers, in order to bring enhanced benefits to the area's economy.

With respect to car parking at the seafront, the amount of public car parking available is considerable and might be said to in fact be excessive given the excellent public transport available to the area and having regard to the negative impact on the overall visual amenity of the area presented by large car parks at either end of the promenade and along the road. With regard to the particular query about the Dawson's site, it is considered that in terms of the overall seafront, it would be preferable to have development, rather than car park at this location, as such development could bring numerous benefits including (a) improvement of the streetscape by filling of this unsightly 'gap', (b) new commercial / cultural activity at the ground floor, and (c) potential residential or perhaps tourism use on upper floors. It would not be possible to achieve an optimally designed development at this location while maintaining the level of car parking currently available on site.

(With regard to the 'Interim Road/Traffic Management Measures' suggested in the submission from the residents of Martello Terrace, these issues are not a matter for the Local Area Plan and have been passed on to the MD engineer's office).

Zoning /mapping

It is not a mapping error that the entire 'harbour' area is zoned 'mixed use' including existing buildings / developed lands. The plan allows for the development of both any vacant lands and already developed sites, such as the Bray Sailing Club and the Harbour Stores, in the event that an existing property owner seeks to demolish and rebuild or extend an existing structure. The redevelopment of existing sites is in fact encouraged if it were to bring benefits to the area. It is not considered reasonable to curtail possible redevelopment opportunities that otherwise comply with the development plan on the basis of the views of one set of residents who don't want to see change in their environs.

²⁹ The Bray and Environs Transport Study being prepared by WCC, DLR, NTA and TII.

The roads and piers are also included as redevelopment opportunities may present themselves in these locations for example, where the road layout proposed to be altered. It is certainly no error that private property, as the vast majority of all lands so zoned in development is private property and there is no differentiation generally in zoning plans regarding private and public property.

The plan includes planning guidance in the sense that the objectives for the area are clearly set out and the design standards of the County Development Plan will apply.

The objectives for the harbour area (which is zoned 'mixed use') are not 'lumped together' in the plan with SLO3 – the fact that these two blocks of land are adjoining simply means that they are visible on the same map. The boundary of the SLO for the golf club does not include the harbour lands.

Harbour Dredging/Removal of Previous Sewage Outlet Pipe

This not a matter for the LAP

Chief Executive's Recommendation

No change

SECTION 3.14 INFRASTRUCTURE

Submissions referring to: **Objective R08** (road at Kilmacanogue) are addressed in Section 3.5 of the report, **Kilruddery** and impact on the SCR are addressed in Section 3.3 of the report; the **Former Golf Club Lands** are addressed in Section 3.6 of the report; **Fassaroe** are addressed in Section 3.17 of the report

Sub No.	Name	Issues raised
C1	Adelaide Road Residents	<p>Seafront traffic congestion and pedestrian safety</p> <p>On the majority of roads between the seafront and the Main Street, the traffic has right of way in both directions. However, from Albert Avenue, the right of way goes around a corner onto Adelaide Road. The traffic coming from the Main Street to the seafront via Galtrim Road (a straight road) meets a Stop sign at the Adelaide Road intersection. Many motorists are on their way through the intersection before they see the Stop sign. It is almost impossible to cross this intersection safely, or indeed the full length of Adelaide Road. It requires a traffic-calming ramp to slow down all traffic (similar to the one outside Colaiste Raithin on the Florence Road). We need to change how traffic functions in this area.</p> <p>We need to put a Stop sign at the natural T-junction at the south end of Adelaide Road, and remove the Stop sign from where Galtrim Road meets Albert Avenue. This would mean that the traffic runs smoothly from the seafront to Novara Road, which adjoins the Main Street. Finally, a pedestrian crossing on Albert Avenue allows pedestrian access to the Meath Road.</p> <p>Regarding the traffic leaving the DART station, there are constant accidents or near- accidents when cars emerge onto Adelaide Road. Despite a Stop sign, cars mistakenly think they have the right of way (this also happens coming in the other direction, from the Florence Road). We also need a traffic-calming ramp on this intersection, to slow traffic coming from all directions.</p> <p>Adelaide Road has houses on one side only. However, the parking is on the opposite side of the road. Adults with children must cross the road constantly, through traffic on this very busy road. The entrance road for Failte Park reduces the amount of parking space available. It would make more sense to park cars on the house side of the road, and make this 'Residents Only', as there is huge pressure on parking.</p> <p>Drainage</p> <p>There is a drain on Adelaide Road, outside no. 2, Westview Terrace. There is another drain on the corner of Galtrim Road and Adelaide Road. This drain is higher than the lowest point on the junction, so when it rains, a huge puddle forms. This is made worse by the fact that neither drain gets cleared out at any point during the year, which can cause both smells and blockage.</p>
C8	Ballywaltrim & Wingfield Residents Association	<p>The major concern to residents is the proposal 8.1.4 on pp. 45 and 46 concerning the objectives for the M/N11 upgrade. They have seen the outline suggestions of TII in this regard (TII M11/N11 Corridor Study April 2017) and are very concerned about the proposal to construct a one way feeder road on the eastern side of the current N11 to take traffic from Dargle Lane and Herbert Road to an improved junction 7. This would have a direct impact on the residents on and adjacent to Ballywaltrim Lane, in terms of increased traffic, noise, pollution and loss of</p>

		<p>amenity through the destruction of trees and woodland that at present shield them from the motorway. they are currently facing the nuisance of 'rat running' in the morning along the lane. The proposals also pose a threat to the protected structure of Kilcrouney Church. If these proposals are developed then they will face vigorous opposition from their members.</p> <p>While congestion on the N11 is a concern, it is well known that increasing road capacity only leads to a further increase in traffic. Alternatives should be examined, including broadband connectivity and performance to reduce travel needs, improving rail and bus facilities, park and ride and a quality bus corridor for North Wicklow and it is good to see these mentioned in the plan.</p>
C18	Bray & District Chamber of Commerce	<p>Infrastructure & Services</p> <p>Car parking in the Town Centre is inadequate. The provision of a large town centre car park (400 spaces) is essential for the further development of the core retail area. The proposed scheme of development for the former Bray Golf Club lands should include a multi-storey carpark and consideration given to allowing the development of a large free car park at ground level on the old town dump which would cater for day-trippers and rail commuters.</p> <p>Local Transport Plan</p> <p>It is noted that the Local Transport Plan for Bray and the Environs is in progress but not yet completed and as such any proposal such as the new route east of Kilmacanogue is premature should not be proposed or considered until the plan is finalised. In any event, this new route would appear to be contrary to the general intention of the plan to consolidate existing development and the protection of the natural environment.</p>
C21	Bray Retailers Group	<p>New mobility systems</p> <p>The Bray Retailers Group is well aware that the car dependency in Bray as evident from the latest Census statistics is unsustainable. Therefore, the pro-active installation of new mobility systems such as bike-share and feeder services to the main public transport hubs is strongly supported by the Group.</p> <p>Climate change</p> <p>As citizens of this world, we are all responsible in our town to change our behaviour to slow down climate change by changing our local economy to a low carbon economy. This requires changes to our transport modes and shifts in how we use and produce energy. It should be reflected in the changes of our physical environment to facilitate such desired changes in behaviour. We also will have to accept that the effects of climate change are upon us. The more extreme local weather episodes for example cannot be managed anymore as once in a lifetime (50 years or 100 years) risks. We will have to have more comprehensive resilience strategies. How will we deal with hurricane-force winds and storm surges, droughts and forest fires which we are not accustomed to? Our sustainable development agenda should be shaped to be first and foremost in our policy frameworks.</p> <p>Roads and Transportation</p> <p>The draft Local Area Plan proposes a number of Public Transport and Road Objectives with which the Bray Retailers Group concurs. In particular the Group wants to see the Local Transport Plan for Bray and Environs being developed by</p>

the NTA to comprehensively alleviate the chronic traffic flow and congestion problems which are so detrimental to Bray's progress and economic wellbeing. The Bray Retailers Group advocates a paradigm shift to facilitate a better flow of traffic and to include the following:

- To increase the number of roundabouts on its arterial spines from the existing ten to twenty, in particular on the Wilford to Wilton spine; the Killarney Road to Kilmacanogue spine; the Wilton to Hills Garage spine; and the Castle Street to Enniskerry spine. Attached please find a map explaining the proposed locations of these roundabouts.
- To change the traffic management system in the town centre by directing traffic to always turn left and to prohibit right turns 'against the oncoming traffic' which causes most of the congestion. This will ensure users proceed to the next roundabout to turn back into the opposite direction so as to be able to 'turn right'.
- To have a general speed restriction of 30km/h in Bray town, with clearly identified roads where the speed limit can be relaxed to 50km/h. These limits are not only to promote road safety, but will actually contribute to better flow. It will also encourage more cycling.
- To build a new dual carriage way from the Wilford roundabout to a new roundabout at the Castle St Shopping Centre entrance/Dwyer Park.
- To introduce a one-way system, like the loop from the Main Street onto Quinsborough Road onto Florence Road back to the Main Street, by taking traffic south up the Vevay Hill onto Church Road and connecting again with Killarney Road. This will alleviate pressure at the convergence of Killarney Road and Vevay Road by diverting traffic coming from the southside onto Church Road. See attached map.

Public transport

Bray furthermore needs to leverage its high quality public transport connections. The Bray Retailers Group proposes the development of a new transportation hub at the Carlisle grounds and siding area that will accommodate one main intercity railway line linking Bray to Rosslare Europort, two DART lines, one LUAS line, a bus terminus and coach bays for public and private operators. It should include sufficient multi-story parking for cars and bicycles to facilitate park-and-ride.

The redevelopment of the existing lands encompassing the Carlisle grounds, Bray train station and the adjacent warehousing/commercial sites should be a mixed-use with significant residential and some commercial elements and could involve the consolidation of the aforementioned land parcels. These developments should be built over the transport tracks, bays and roads. The aim should be to get up to 900 units into this footprint.

The transportation hub should also be well connected with the Main Street and with the northside of the Dargle River. A new road and bridge should link the hub with the developments on the old golf course and continue as an arterial route to a new roundabout at the crossing of Quinsborough Road and Adelaide Road.

The Group believes the new transportation hub will enable a much better uptake of public transport compared to the disappointing Census 2016 statistics

It is evident that the preferences of families to take students and children to school by car far outweigh more sensible travel modes such as travelling by bus, cycling or walking. This may be the result of perceptions that it is unsafe to travel by bike. The proposed lower speed limits should help but it is further proposed that the Cycling and Walking Objective CW2 should be emboldened to include a survey of existing cycle ways and routes to schools and to determine

		<p>improvements of cycle lanes and restrictions on other modes of transport (right-of-way signage and bylaws for example) to encourage more children and students to cycle.</p> <p>LUAS The Bray Retailers Group proposes that all organisations in Bray and environs as well as in neighbouring counties work together to reprioritise the extension of the LUAS to Bray. For the Dublin Metropolitan Region, the logic will be that the LUAS also connects to the DART at a gateway as per the proposed transportation hub above, to ensure that much larger volumes of commuters are accommodated in future to use a mix of public transport modes.</p> <p>The Group would like to see a bold approach to route the LUAS through Bray. The proposed route could be for the LUAS to enter Little Bray via the Shankill/Shanganagh axis and continue to the proposed transportation hub at the Carlisle grounds. The line could then leave the transportation hub and go up the Quinsborough Road and turn north in Galtrim Park and over the Dargle at a new LUAS plus pedestrian and cycle bridge to loop back to the north-south line coming from Shankill. New LUAS Stations close to the crossing of Quinsborough Road and Galtrim Park as well as a station close to the new schools on the golf course will significantly increase the connectivity of the Town Centre to the multi-modal public transport system. See the attached map.</p>
<p>C39</p>	<p>O. Fenelon</p>	<p>Traffic congestion The section relating to Infrastructure & Services fails to explain how it is planned to address the already chronic traffic situation with accessing and exiting Bray town centre. The ambition of the plan to retain and develop the town centre as the retail hub within Bray, will significantly increase pressure on traffic and parking capacity. The plan does not adequately explain how the traffic associated with the increased activity within the town centre will be accommodated. There is no detail provided as to how the road network into, within and exiting the town will be enhanced to cater for the increased volumes of traffic that will be generated.</p> <p>Parking The plan does not explain how the excess parking challenges that increased shopping and retail capacity envisaged by the plan will be met. The existing parking facilities within the town centre are already operating at capacity. There is no detail provided to explain how the increased parking demands that will be generated as a result of the increase in retail space and urban living as envisaged by the plan, will be met. The ambition to provide “appropriately scaled retail” through the expansion of Fassaroe without undermining “the role of Bray town centre as the principal shopping destination” will compound this problem.</p> <p>Can more detail be provided as to how the traffic and parking challenges expected as a result of this plan have</p> <ol style="list-style-type: none"> a) Been estimated and quantified b) Will be addressed
<p>C66</p>	<p>T. Cookson</p>	<p>LUAS The LUAS must go to Bray Town Centre, not the new to-be-developed site at Fassaroe, west of the N11. The decision must NOT be made on the influence of</p>

		<p>any developer to part-fund a LUAS station!</p> <p>Cycling and walking Safe cycling and walking for our children and all of us must be prioritised. We need safe, separated cycle lanes.</p> <p>Increase car movement It is unrealistic that a town like Bray can continue to accommodate an ever-increasing number of cars, without having to ruin our unique and precious architectural heritage. It must be made easier for people to get into the town centre without driving. Shuttle buses would be a good idea.</p>
<p>C82</p>	<p>A. Dempsey</p>	<p>Transport for Bray Developing quality transport infrastructure is of crucial concern to the effective growth. High value employment requires advanced skills that may not be readily available in nearby areas. The cost and time of travel determines the range people are willing to go for work. Improving the connectivity in will increase the area in which people look for jobs. With a substantial FDI presence in Bray, it is highly likely that many are travelling relatively long distances to work in Bray. High housing costs and limited connectivity into and around Bray may disincentives investment in the town. Improving local connectivity allows a more efficient distribution of skills and economic activity.</p> <p>Poor transport connectivity has also been linked to social deprivation. Those living in areas that are the most disadvantaged in terms of transport connectivity are more likely to be subject to social deprivation. Compounding the problem is that with poor access to services and jobs, they then suffer from limited opportunities to reduce their levels of deprivation.</p> <p>From an enterprise point of view, transport can bring firms closer to their supply chain and share expertise, boosting productivity. From a sustainability point of view, better connectivity reduces the need to depend on cars as a means of transport, reducing emissions and easing congestion. Congestion is a major issue not just in Dublin but across all Irish cities.</p> <p>Currently, there are several connectivity challenges facing Bray. Primarily, the M11/M50 merge is lacking capacity and regularly reaches a standstill during peak hours. It is unacceptable that traffic reaches a halt on a national motorway at a predictable time every day without plans to rectify the situation. Working with the other affected local authorities, the Department of Transport, Tourism and Sport, and Transport Infrastructure Ireland, the capacity and traffic management for the merging point should be a priority for the Council. In addition, further south on the N11, the lower speed limits around Kilmacanogue are acting as a choke point for rush hour traffic. Going forward, alternative options should be explored to prevent this occurring, including examining the possibility of upgrading the road to full motorway status where possible.</p> <p>Public transport With a growing population in the district and higher employment, public transport infrastructure is stretched. This situation is exasperated by the fact that state subvention for public transport cut during the financial crisis has not been fully restored. This has left public transport bodies stretched and unable to improve services or make significant investments in infrastructure. Rush hour</p>

		<p>DART services are nearing absolute capacity and it is only a matter of time before service quality deteriorates significantly due to overcrowding. The Council should lobby government, Transport Infrastructure Ireland, and CIE and Irish Rail to undertake a detailed study of current and future capacity requirements, with a view to scoping the feasibility of increasing the frequency of DART services. In particular, the link between Bray and Greystones should be examined as only 2 trains per hour currently run between the stations. This is obviously due to the presence of only one track along the line. However, because a return journey takes only 20 minutes between stations, it is possible to run three trains every hour that could shuttle passengers between stations using Bray's third platform if necessary. Planning ahead for the eventuality of overcrowding would significantly improve the quality of services for residents in and around the district.</p> <p>Traffic congestion</p> <p>There are concerns for the increased traffic congestion that may be caused by the developments in the old Bray golf club site. While it is welcomed that the development of the area for commercial, residential and public services purposes, increased traffic in an area already suffering from significant congestion may prove problematic for the effective functioning of both the new and existing areas.</p>
C116	A. Endrizzi	<p>The aim of making Bray a town conducive to walking becomes less and less possible as it expands, commuting also takes longer and longer, and public transport routes cannot be extended infinitely.</p> <p>The plan should allow for an orbital route around Bray, totally within the Bray urban area. It should not allow for any expansion of the N11/M11.</p> <p>There is inefficiency in our infrastructure, in that there is no direct route, within Bray, between one end of the town and the other. The submitter would suggest a direct route from Little Bray, going through the western side of the town (close to the edge of, but still within, the urban area), through to Southern Cross and the southern end of Vevay Road.</p> <p>There should perhaps be some research done into the possibility of connecting existing roads in Bray, such as the following: Upper Dargle Road (at its western end) to Herbert Road (this would likely require a bridge over the Dargle River), and Herbert Road to Ballywaltrim Lane.</p> <p>If such a route did exist, a bus route could be put in place in the future, to transport people from one end of the town to the other. Such a bus route could be linked to existing routes between Vevay Road, along the Main Street to Little Bray, providing good transport around the town.</p>
C129	Bob Galvin	<p>Flood works</p> <p>The Dargle flood works are nearly finished, but before the contractor leaves WCC should install safety ladders at either side of Bray main street bridge in the interest of public safety. If a person fell into the River Dargle at present it is not possible to get out due to the high walls and where there is a grass bank, they cannot exit as there are high railings preventing exit.</p>

C162	Michael & June Kelly	<p>Public transport</p> <p>The submitters propose a shuttle train service from Bray through Kilcoole and all the little villages to Arklow and to concentrate development around this service as opposed to increasing the development and traffic through Kilmacanogue.</p>
C182	Martello Terrace Bray Residents Association	<p>M50/N11</p> <p>With many of our residents being regular users of the M50 motorway and sufferers of the serious and dangerous congestion and hazards of the M50/N11 merging point, we are strongly supportive of the provision in the draft Plan identifying this issue as one for urgent attention in the coming years.</p> <p>It is the hope of the residents that agreement can be reached on the extension of the LUAS to Bray with its terminus adjacent to the train station.</p>
C234	Stephen O'Leary	<p>The submitter is a resident of Killarney Glen, Herbert Road, Bray and they have concerns with regard to traffic congestion.</p> <p>It is not clear from the plan what will be done to address the appalling traffic congestion in Bray. This traffic congestion has got much worse over recent years. It has taken me up to 30 minutes to drive down the main street from the town hall to the bridge. It usually take more than 20 minutes to reach the M50 from the main street/Herbert road junction in the mornings.</p>
C236	David O'Neill	<p>Traffic congestion</p> <p>Traffic congestion is bad and will only get worse at the lights between Sunnybank and Old Conna and further on to Wilford Roundabout. It is assumed that there will be lights at the junction at the corner of the Coach and Horses. These lights should be synchronised with a strict speed limit applied. The speed limits should be strictly implemented to stop speed limit breakers.</p> <p>Footpath</p> <p>The pavement opposite the Royal Hotel is dangerous in the rain.</p>
C251	Hugh Quigley	<p>The existing road arrangements through Kilmacanogue are substandard and unsafe and the submitter makes the following observations:</p> <p>M11</p> <p><u>Southbound from the end of the M11:</u></p> <ul style="list-style-type: none"> • Existing arrangements for pedestrians and cyclists, travelling from the Fassaroe junction (including the Fassaroe Bridge) are poor, with little or no separation from vehicular traffic to Kilmacanogue. • The arrangements for traffic wishing to access any of the business premises in Kilmacanogue (to the east of the N11) are poor, particularly for Heavy Goods Vehicles entering Glen Fuels. • Traffic exiting the Glen Fuel or Topaz Service Station should not be permitted to merge immediately onto the N11 but directed up the off-ramp at Junction 8 and then safely rejoin the N11 from the on-ramp. <p><u>Northbound from Glen of the Downs:</u></p> <ul style="list-style-type: none"> • Traffic wishing to exit the N11 at Junction 8 tend to approach the "button" roundabout at the exit at excessively high speed (already on one occasion a vehicle has failed to stop and crashed into the wall of Pluck's car park). Speed

		<p>restrictions on the approach to this exit are required.</p> <ul style="list-style-type: none"> • There is insufficient observation of the painted double yellow lines opposite the service station with many vehicles, particularly light and heavy commercial vehicles, parking there for a few minutes while making purchases in the Service Station. Oftentimes the roadway outside the Service Station becomes completely blocked, especially if the service station is busy and vehicles are queuing to access the fuel pumps. • Consideration should be given to relocating the public bus stop as currently, all buses travelling from the south can only halt at the bus stop via the "button" roundabout and along the narrow roadway outside the service station. • Consideration should be given to removing the painted ghost island that forces traffic wishing to access Avoca Handweavers to merge into the inner carriageway of the N11 and then exit again almost immediately. • There is no separation for pedestrians or cyclists from vehicular traffic from just past Avoca Handweavers all the way along to the Fassaroe exit.
<p>C261</p>	<p>M. Rogers</p>	<p>LUAS</p> <p>The LUAS must go to Bray Town Centre, not the new to-be-developed site at Fassaroe, west of the N11. The decision must NOT be made on the influence of any developer to part-fund a LUAS station!</p> <p>Cycling and walking</p> <p>Safe cycling and walking for our children and all of us must be prioritised. We need safe, separated cycle lanes.</p> <p>Increase in cars</p> <p>It is unrealistic that a town like Bray can continue to accommodate an ever-increasing number of cars, without having to ruin our unique and precious architectural heritage. It must be made easier for people to get into the town centre without driving. Shuttle buses would be a good idea.</p>
<p>C267</p>	<p>St. Gerard's Senior School</p>	<p>St. Gerard's Schools is located in Dún Laoghaire-Rathdown at Thornhill Road. It is proximate to the areas outlined within the LAP and therefore any development in the area could have a bearing on the operation of the school. They make the following observations to the LAP:</p> <p>Road Objective RO4 proposes a new north-south route from the new distributor road at Fassaroe across Ballyman Glen to link up with Old Conna Road. This proposal could provide an opportunity to remove/ limit through traffic from Thornhill Road, but should be undertaken in a manner appreciative of School operations.</p> <p>Transport Zoning Objective PT3 supports the extension of the LUAS and other transport links in the area. Transport Zoning Objective PT5 references new development of land at Fassaroe, which is expected to increase traffic in the area. It is appreciated that these developments will improve transport and road infrastructure in the area and would request that their effect on the school campus is considered as part of the review process.</p> <p>Improved east-west linkages in the area and improved and/or increased number of road crossings of the Dargle river may improve access towards St. Gerard's from Bray Town which would be a benefit to the School population.</p>

<p>C268</p>	<p>Tessa Stewart & Peter Crisp</p>	<p>Climate Change Any new development should be required to have energy conservation measures in place.</p> <p>Flooding Developers should be told that storm and surface water infrastructure needs to be ready for more intense rain events. The Council should mandate that front and back gardens cannot be paved over unless provision is made for run-off. Preferably porous solutions should be used. For example, in Charnwood estate all the water is flowing down the hill to our street at the bottom of the hill, where it does not disperse into the already full storm drain. Every year more people pave over their gardens and soon we will have water in our front doors. We already need a drain upgrade.</p>
<p>C293</p>	<p>Jesse Zauka</p>	<p>Cycling and walking The submitter is a resident of La Vallee apartments in Bray. Currently cyclists and pedestrians have very limited space there. There is no pedestrian/cycling bridge to Fassaroe. Dargle Road full of dust and families with kids do not feel safe walking there. It is suggested to make a bridge to Herbert Road or Fassaroe. La Valle/Riversdale residents would be very happy if you consider a pedestrian bridge to "big Bray".</p>
<p>C296</p>	<p>Brigid O Brien</p>	<p>The submitter has lived in Bray since 1984.</p> <p>The Flood Plain. Please leave it alone. Allow it to become the soakage area for wild life and grasses. It would have a value as a special study area for engineering students. This did happen in Salzburg after their river returned unexpectedly to its original course.</p>

Opinion of Chief Executive

Transportation and Movement

North County Wicklow, including Bray and Environs has been designated for significant population growth from national and regional policy. It is acknowledged that there is an existing traffic congestion problem on the N11/M11 in north County Wicklow that has a direct impact on Bray environs and Kilmacanogue. Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA) are the two main national transport authorities that have the responsibility to address these transportation and movement issue and to seek to put in place a transport system that accommodates the future population growth and increased traffic volumes in the future.

Transport Infrastructure Ireland (TII)

Currently the M11/N11 corridor is operating in excess of capacity in the northbound direction during the AM peak and in excess of capacity in the southbound direction during the PM peak. In addition, there have been limited corresponding improvements in the local road network, public transport and/or sustainable modes of transport along this corridor and as a result the demand for private vehicular travel along the M11/N11 has continued to escalate.

To assist in understanding the issues prevalent on the M11/N11 Corridor, TII has prepared the M11/N11 Corridor Study: Needs Assessment Report in consultation with key stakeholders, including Wicklow County Council. This study outlines improvement works, consistent with those included in the NTA Transport Strategy,

for the M11/N11 Corridor and elaborates further on off-network, i.e. complementary local transport measures required to facilitate the on-going strategic function of the M11/N11 national road corridor.

The TII's M11/N11 Corridor Study was issued in April, 2017. The objectives of which are as follows:

1. Identify the improvements required to:

- Bring the section of the corridor (M11/N11 mainline and junctions) up to the appropriate standard;
- Develop the regional and local road network to support local access and complement the corridor strategy, including the closure of all direct accesses; and
- Ensure the safe daily operation of the M11/N11 mainline and junctions in the event of the occurrence of incidents.

2. Identify a phased implementation of the improvements such that operational benefits on the corridor can be realised at an early stage without compromising the long term strategy.

The M11/N11 is of strategic importance nationally and this is reflected in its inclusion within the TransEuropean Transport Network comprehensive road network. Therefore it is imperative that it begins to operate more efficiently. The report outlines *"The section of the M11/N11 between the Junction 4 (M50) and Junction 8 (Kilmacanogue) is a strategic two lane dual carriageway. Some sections of this portion of the M11/N11 corridor fall short in terms of current road design standards. This section of the N11 is also situated between two sections of recently upgraded high quality motorway, which tends to emphasise the issues along the subject section. These deficiencies impact on traffic flow conditions and result in significant congestion during the weekday morning and evening peaks and ineffective levels of service."* The study has presented a number of proposals for the upgrading of the N11/M11 and the Council is committed to working with and supporting the work of the NTA and TII in the improvement of the road network in the area, including the N11 and this LAP sets out the Council's position in this regard, with the proposals incorporated into the LAP.

It is important to note that any upgrade works will be the subject of an approval process (through An Bord Pleanála) where there will be an opportunity for public to view the specific design of the proposal and have their say on the proposal.

National Transport Authority (NTA)

Further to this, given the significant growth designated for Bray Town and Fassaroe and the surrounding areas, the NTA are currently engaged with Wicklow County Council, Dún Laoghaire Rathdown County Council and Transport Infrastructure Ireland (TII) in undertaking an Area Based Transport Plan for Bray and Environs and its delivery is imminent. This Area Based Transport Plan will assist in informing land use and transport policy in the Municipal District Plan area in the interests of developing a sustainable and integrated land use and transport planning framework to guide development, including identified growth areas such as Fassaroe.

This transport plan is supported by the LAP with the objectives "**PT1** To cooperate with NTA and other relevant transport planning bodies in the delivery of a high quality, integrated transport system in the Bray MD area" and "**PT2** To support the NTA in the crafting of a **Local Transport Plan** for the Bray area and to facilitate the implementation of measures contained therein."

Hence it is acknowledged that there are serious transportation and movement issues in the Bray Municipal District Area; however the NTA, TII and Wicklow County Council are working to improve this issue. It is also important to note that the Bray Municipal District Local Area Plan has been crafted to create a sustainable self-sufficient town reducing the reliance on the private car where people live close to their work and all services needed, *"The town has the potential to be the most sustainable town in the County – a town which can most easily achieve the vision of 'walkable' communities whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance."*

Public transport

Bray is well connected by a high quality public transport system, centred at the Bray DART Station. It is not proposed to use the Carlisle grounds as a transport hub.

It is acknowledged that the key to getting people out of their cars and into public transport is to have a reliable, convenient, frequent and fast service available, that brings people to the places they want to go. For Bray MD this will primarily mean into (1) Bray town centre, to the transport hub at Bray train station and the main employment zones in Bray that are outside the town centre, such as along the Southern Cross Road and (2) Dublin, namely Dublin city centre, Sandyford and the M50 ring (pending the rebalancing of employment and retail opportunities into Wicklow).

It is important to note that Wicklow County Council is not itself a public transport provider, and cannot force providers to deliver services in any particular area, however development plans can put in place the necessary policy framework to encourage and facilitate the improvement of public transport. The 'Local Transport Plan' for Bray will look at the public transport in the area in detail and craft a strategy that address the public transport needs of the town and its future population.

Seafront traffic congestion and pedestrian safety

The Council has invested significantly in this area over the last number of years and has carried out substantial improvements to the 'urban realm' and appearance of this area including road and footpath improvements, new pedestrian crossings, and development of cycling facilities which has improved pedestrian and cyclist safety. It is acknowledged that there is congestion at times, this is in the context of it being a long standing tourism and amenity area and it is not considered reasonable to prevent visitor traffic. There is no simple resolution to this issue however there have been a number of successful improvements implemented to help ease this congestion.

Traffic control and implementation

The concerns of the submitters with regard to vehicles not adhering to traffic controls are noted however this is a matter for the Garda Síochána as opposed to a land use plan.

Additional traffic controls

A number of traffic controls proposals, like additional stop signs, traffic calming ramps and the location of residential parking, have put forward at different location around the Bray area. This is not an issue for the LAP however the proposals will be brought to the attention of the Municipal District Engineers for their consideration.

LUAS

The NTA proposes to bring the LUAS to Shanganagh/Woodbrook north of Bray; there is no current proposal to bring the LUAS to Fassaroe. Albeit it is not a national proposal to bring the LUAS to Bray in the current NTA strategy, the Local Area Plan facilitates the extension of the LUAS to Bray as a long term project "*TR2, to promote the linkage of the LUAS extension or other mass transit to Bray town centre, Bray train station and Fassaroe;*". Wicklow County Council continues to work with the transport authorities to bring the LUAS or another rapid transport mode to the area.

Surface water drainage

Wicklow County council are responsible for the management of storm and surface water infrastructure. As the seriousness and threat of global environmental problems increases it is widely anticipated that changes in rainfall patterns and rises in sea levels resulting from climate change will increase the frequency and severity of flooding in the future placing increased demands on surface water infrastructure. In light of these global climate changes, alongside the anticipated growth of the County, future development and the subsequent

reduction in the permeability of lands, the management of storm and surface water infiltration will be of increasing importance. Over the lifetime of this plan the effective management of issues through Sustainable Urban Drainage Systems will be required. All new development is required to minimise surface water discharges through Sustainable Urban Drainage Systems (SUDS). Specific issues with regard to surface water around drains is not a matter for a LAP. This is an issue for the Municipal District office and it shall be brought to the attention of the MD engineer.

Climate Change

The National Climate Change Adaptation Framework '*Building Resilience to Climate Change*' provides the policy context for a strategic national adaptation response to climate change in Ireland and is designed to evolve over time as planning and implementation progresses and as further evidence becomes available. The adaptation framework recognises the importance of planning and development measures in the overall strategic approach to adaptation to climate change. In this regard a 'Climate Change Audit' whereby objectives that both mitigate against the source of the causes of climate change and adapt to reduce the impacts of climate change has been integrated into the County Development Plan.

Adaptation to Climate Change is a key strategic goal of the County development Plan and the Local Area Plan. *"To address the climate change challenge, as a plan dynamic, throughout the County Plan, directly in the areas of flooding and renewable energy, and indirectly by integrating climate change and sustainable development into statements of plan policy, strategies and objectives."* Climate change has been addressed directly and indirectly throughout the County Development Plan and the draft LAP by integrating objectives that mitigate the source of the causes of climate change and secondly adapt to the impacts of climate change. Section 9.5.2 of the County Development plan has a detailed section on Climate Change that is applicable to the Bray LAP.

Energy conservation

The County Development Plan encourages and facilitates the provision of energy efficient buildings/developments. Section 9.5.3 on Climate Change and Energy has a number of objectives in place to facilitate this and the Development and Design Standards seeks *"To require all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006;"*

Flooding

Wicklow County Council is responsible for implementing the provisions of 'The Planning System and Flood Risk Management' Guidelines (2009) in the carrying out of their development management functions and they require a Strategic Flood Risk Assessment to be carried out during all plan making processes. A Stage 1 Strategic Flood Risk Assessment (SFRA) including flood maps for Bray Municipal District has been prepared as part of this LAP process and is appended to this plan. The SFRA has identified flooding and/or surface water management issues related to the Bray Municipal District that may warrant further investigation at the planning application level.

The SFRA contained within the appendices of the Plan, provides information on various flood risk indicators that occur within the area. The SFRA also provides information on the three types of flood zones (A, B and C), the sequential approach and justification test to be considered and implemented at the development management stage. Flood management should also have regard to surface water, groundwater, drinking water supply, flood plains and water and wastewater infrastructure.

The Council has implemented a comprehensive risk-based planning approach to flood management to prevent or minimize future flood risk in the Bray MD area. In accordance with the Flood Risk Guidelines, the LAP avoids certain types of vulnerable development in areas where flood risk has been identified. Where flood risk may be an issue for any proposed development, a flood risk assessment should be carried out that is appropriate to the scale and nature of the development and the risks arising. This shall be undertaken in accordance with the Flood Risk Guidelines.

The matter of providing safety ladders at either side of Bray main street bridge is not an issue for the local area plan. Wicklow County Council are working on the flood scheme in conjunction with the OPW and this suggestion will be referred on to the Bray MD office for their consideration.

Town Centre car parking

There are a number of public and private car parks in and within a short walking distance of the main street in Bray. It is proposed that there will be public parking as part of the Florentine Centre and Former Golf Club lands developments. It is also important to note that there is a parking control regime in Bray, which by its nature generally ensures that long stays are discouraged in order that shorter term business and shopping trips can be accommodated.

The plan is criticised for not addressing traffic congestion issues but it must be borne in mind that a Local Area Plan is a land use framework and not a traffic management strategy. The Council is constantly looking at ways of improving traffic flows in the town and is also working closely with the infrastructure agencies and providers to address traffic and movement issues in Bray.

New mobility systems

The Bray retailers Group support of new mobility systems such as bike-share and feeder services to the main public transport hubs is noted. The draft LAP facilitates the development of such initiatives at appropriate locations.

Cycling lanes and footpaths

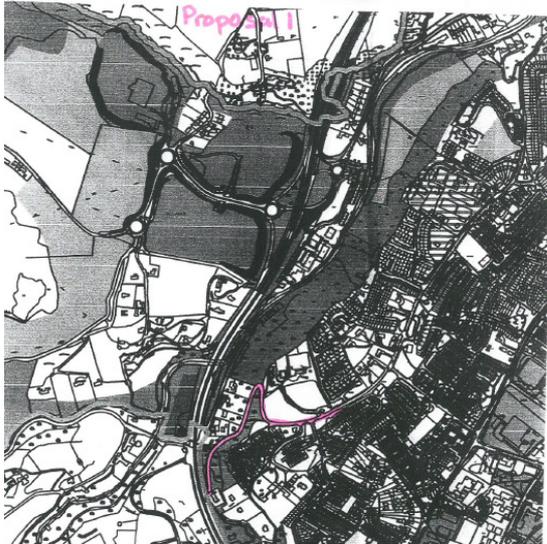
It is acknowledged that there are some areas in Bray that have inadequate / no footpaths and cycle-lanes along a public road. It is a goal of the plan to *"To allow for the improvement or provision of new walking and cycling facilities throughout the District"* with the objectives to *"CW1 To improve existing or provide new foot and cycleways on existing public roads, as funding allows and to facilitate the development of a cycling and walking amenity routes throughout the District including foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination (be that town centre, schools, community facilities or transport nodes), while ensuring that personal safety, particularly at night time, is of the utmost priority."* The NTA also has a Greater Dublin Area Cycle Network Plan that has an extensive network plan to provide and enhance the cycle network in Bray and Wicklow as a whole.

Chief Executive's Recommendation

No change

SECTION 3.15 BUILT AND NATURAL HERITAGE

This section of the report deals with the submissions that have been made with respect to Built and Natural Heritage.

No.	Name	Issues raised
C5	Ashton Wood Residents Association	<p>1) Tree Preservation Orders Submission proposes the tree lined section of the Herbert Road, outlined below, to be included in the Tree Preservation Order.</p>  <p>2) Kilbride House The submission requests the definition of the curtilage associated with the protected structure Kilbride Hill House. The submitter is proposing that the curtilage is the entire site as outlined below.</p> 
C7	Balark Trading GP Ltd	<p>This submission relates to Kilbride Hill House. It is requested:</p> <p>(a) The designation of Kilbride Hill House lands as 'open space and parks' be</p>

removed and replaced with an objective that future development should manage, provide for and improve green infrastructure. This is to avoid confusion and conflict with the residential zoning.

The 'Existing Residential' zoning of the main site is shown on the zoning map which is the primary source when considering development objectives of a site. All other policies and objectives within the LAP must be compliant with the zoning of a site. It is therefore, unclear why Map GI1 from the Draft Plan identifies the main site at Kilbride Hill House as Open Space and Parks.

It is considered that this is a somewhat conflicting objective with regard to the zoning of the site as 'Existing Residential' and its established use as a private residence which is not, nor has ever been, available for public use. The submission notes that no other private residence within the Draft LAP has been identified as Open Space and Parks and considers that this could potentially be considered to infringe on private property rights via a circumvention of the zoning process. This is particularly evident when it is stated within the Draft LAP that the Green Infrastructure map has informed the zoning provisions of the Plan. In this case, the Green Infrastructure map wholly conflicts with the zoning of the site and creates confusion.

Notwithstanding this, it might be surmised that the identification of this private residence as an Open Space and Park indicates a desire to see the lands used and enjoyed by the wider community and that the ecological characteristics of the site should be utilised and strengthened in compliance with the Residential zoning of the site. Essentially, this has already been proposed via the live planning application on the site (Ref. 171085) which proposes a residential development of 43 no. dwellings and the provision of public open spaces, a playground, a pedestrian link to the woodland to the north-west and the retention and strengthening of the boundary tree belt.

It is considered that in order to ensure consistency throughout the LAP, the Green Infrastructure map should be amended to ensure that cognisance is taken of the residential zoning of Kilbride Hill House. The submission recommends that the designation of the site as Open Space and Parks be removed and replaced with an objective that future development should manage, provide for and improve green infrastructure.

(b) Objective GI4 of the draft LAP states *"To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan"*. Although this objective is acceptable in principle, the preservation of trees should always have regard to the recommendations of qualified arborists and allow for intervention where long term preservation is unviable or may impact on public safety. In this regard, we note that many trees planted on demesne or estate lands were chosen with regard to their ornamental features, do not comprise native species and are of a limited lifespan.

It is requested that Objective GI4 be amended as per the following text in bold, ***"To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne***

		<i>planting, where considered to be viable and in line with sound arboricultural management, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan”.</i>
C8	Ballywatrim & Wingfield Residents Association	<p>The submission supports the protection of the trees on Ballywaltrim Lane and around Violet Hill that contribute greatly to the amenity of the area. For this to be meaningful, the specific trees worthy of protection should be identified.</p> <p>The built and natural heritage and the green infrastructure objectives are supported.</p>
C18	Bray & District Chamber of Commerce	<p>Further erosion of lands at the Kilruddery demesne should not be permitted and no further residential development take place as it is not necessary and detrimental to this very important estate which is a major asset from a heritage and environmental point of view. The development of the estate by its owners as a tourist and recreational attraction should be encouraged and facilitated where possible. The entire estate should be zoned KD and the section zoned R20 removed.</p> <p>Oldcourt Castle is hidden gem which the Chamber believes this provides a link between the Swan River, the Dargle River, the town centre and Kilruddery and the LAP should contain a commitment to protect this important building structure and the surrounding land which contains significant trees and other plants and provides a context for the castle rather than allow any more development which development can, in any event, be provided elsewhere in the Bray MD. The zoning should be changed from R20 to OS2.</p>
C25	Bray Tidy Towns	<p>Bray Tidy Towns have submitted proposals for 3 no. areas to be considered as Architectural Conservation Areas (ACA).</p> <p>The submission proposes the following areas-</p> <ol style="list-style-type: none"> 1) Quinsboro Road, Florence Road and Eglinton Road 2) Galtrim / Wyndham / Adelaide / Novara / Sidmonton and Meath Road 3) Seafont <p>The submission includes a detailed description of each of the three area listed above. Overall the submission notes the following reasons for the proposed ACAs in Bray:</p> <p>1) OLD AND TROUBLESOME ISSUES SUCH AS SHOPFRONT NAMES AND SIGNAGE CAN BE GIVEN A FRAMEWORK</p> <p>ACAs are bespoke and can deal with concepts such as minimizing visual impact, general standard of design, signage on shop-fronts, service cables, size of road signage and waste disposal bins. Architectural Heritage Protection Guidelines for Planning Authorities (AHPG) Chapter 3 Section 3.11.2 & Section 3.7.4. Bray Tidy Towns of the opinion that the Quinsboro Road in particular would benefit from a signage policy.</p> <p>2) QUINSBORO ROAD</p> <p>Bray Tidy Towns firmly believe that the adoption of planning policies through an ACA for the Quinsboro Road would at least halt some of the neglect</p>

currently endured by this most historical of Streets. The houses at the back of Nos. 1-11 Quinsboro Road are derelict and have been for quite some time.

3) ACA MORE FLEXIBLE THAN PROTECTED STRUCTURE

The building guidelines for ACAs relate to areas and streetscapes which are similar in character and although offering guidelines for the preservation of building exteriors do not, unlike guidelines affecting buildings with protected status, seek to influence the internal structures of buildings. An ACA status is arguably more user friendly than a Protected Structure statue. See Section 3.2.3 of the AHPG.

4) ONLY RELEVANT GUIDELINES NEED BE INCLUDED IN PLANNING POLICY

As you are aware, *"it is at the discretion of the planning authority to make the policies to protect these areas appropriate to the particular circumstances"*. AHPG, Chapter 3 Section 3.2.10. Therefore controls can be put in place to suit specific areas.

5) NOT ALL NOTABLE BUILDINGS ARE ON PROTECTED STRUCTURE LIST

There is a belief that most of the houses requiring to be protected are on the Record of Protected Structures list: this is not the case. In the case of Quinsboro Road the signage problem at the unprotected Main Street end is pervasive and interferes with the character of the entire Quinsboro Road. Several structures on the Building Survey of Ireland list are not on the Protected structures list and these include:

- Quinsboro Road area – although the main terraces such as Prince of Wales Tce; Duncairn Tce., are on the list of Protected Structures the area of the Quinsboro Road nearest the Main Street are not. It is this area that has the issue with temporary or inappropriate signage which includes the old Northern Bank originally designed by the architect Beater who worked on many notable buildings in Dublin including Arnotts Henry Street.
- Seafront area – Brennan's Parade - 14 houses, Marine Terrace - four houses, Fitzwilliam/Marlborough Tce - eight houses, Bray Coastguard Station 6 cottages (currently involved with a planning application which is under consideration by An Bord Pleanala). There are other unprotected structures such as the actual Esplanade itself and the two art deco houses at the Harbour end of the Seafront.
- Meath Road area – houses not on the Protected Structure list in this area include Shoreline House, Killisk House, Heyford House and Sloan Tce.

6) OTHER AREAS IN WICKLOW WITH ACAs

Currently Bray, unlike eight towns in Wicklow does not have any ACAs in place although a previous plan stated the intention of looking for ACA status for two locations namely Sidmonton Park and King Edward Road. The nearest town in size to Bray on this list is Wicklow town, which has ACAs for four separate areas including their Main Street. Other towns, which have ACA's are:

- Blessington
- Rathdrum
- Tinahely

		<ul style="list-style-type: none"> • Greystones – Four areas • Delgany • Dunlavin • Enniskerry <p>7) CONSOLIDATING ACA AREAS</p> <p>If the current format of having three ACA areas is not feasible it may be more appropriate to combine all three areas into one for the sake of cohesion as the houses in these areas were built either during the Victorian era which is 1837 – 1901 or the Edwardian era which is 1901 – 1910. The features requiring preservation in both cases would consist mainly of the cast iron railings, sash windows, brick-work, roof tiles and timber detail on front doors and surrounds. In some instances the front curtilages would require protection. See AHPG Sections 3.2.3,3.2.10 and 3.3.2</p> <p>Bray Tidy Towns feel that the ACA is a planning tool to be used by planners to ensure that they can have greater influence on how an area develops.</p>
C33	Caroline Burrell	<p>In relation to the seafront in Bray, the submitter believes the two art-deco 1930's style houses at the end of Strand Road opposite the Martello Terrace should be listed as protected structures as these houses are of a unique style and will not be built again. There were three originally with one being given planning permission for demolishing and this site has been built on, one has been adapted in a fitting and sustainable manner while the third is still in its original state.</p> <p>The submitter would like to request that the Victorian seatbacks that have been installed on the promenade, which are welcomed and appreciated, are in keeping with the area and Victorian heritage, should be protected and maintained (such any rust removed and being painted).</p> <p>The submitter would also request that we try to keep and enhance this heritage by not adding "modern" pieces that do not sit well in this environment and to add more pieces in keeping such as the old Victorian style street lamps which used to exist on the pillars of the steps from the green area to the prom itself.</p>
C39	Robert & Orla Byrne	<p>This submission refers to the "protection and enhancement of the Victorian building stock in Bray and to help safeguard the local character and distinctiveness of the area and its surrounding. Already throughout the town a number of these Victorian buildings have failed to be persevered and protected by Wicklow County Council. In fact on Eglinton Road alone No. 6, 7 & 8 (which are wholly owned by the Council) have been left to deteriorate significantly whereby anti social behaviour has become a common feature. Further investigation of such deterioration needs to be explored.</p>
C66 & C261	Tim Cookson & Michelle Rogers	<p>These submissions advise that it is critical that we protect and preserve our architectural heritage. In terms of future development of Bray as a good place to live and a good place to visit, destroying our architectural heritage is killing the goose that laid the golden egg.</p> <p>The submissions request that the Council take steps to preserve the unique character of our Main Street in Bray and surrounding streets of beautiful old buildings. It is a scandal that the huge ugly block of flats and shop units was</p>

		<p>built up the top of the town near McDonald's, destroying the character of a Victorian Main Street that had up until then remained pretty much unchanged for over 100 years. A lesson is that those depressing shop spaces cannot be filled and lie vacant. Please preserve the view, the architectural heritage or our Main Street, town centre and esplanade. This should be a major concern when planning is sought to demolish ANY old building in the town.</p> <p>Preserve beautiful spaces like the People's Park - a lovely old Victorian park. Please preserve the view looking from the new park entrance by the boardwalk up to the mountains - it is beautiful sweeping parkland running along the river, with lovely old houses at the top of the park and a beautiful backdrop of mountains. This view should be preserved and protected.</p> <p>Please protect all the old trees in the People's Park and around the town from either being cut down or from being brutally pruned so as to ruin their shape - as has happened in the town. There must be a process whereby residents are informed of the council's plans to cut down trees so that we have a chance to object. There have been some beautiful old trees cut down with no consultation. We treasure those trees as part of OUR natural heritage.</p> <p>Please preserve the esplanade and harbour as unique areas of architectural importance. Greystones is a terrible lesson on what can happen when we have developer-led planning that ends up ruining architectural heritage. The harbour must NOT be developed - there is no need for it.</p> <p>Please preserve the harbour as a wildlife reserve. Please make it into an official wildlife reserve. Any work should take into account the fact that it is a precious reserve for so many beautiful wild birds and they should be protected from disturbance of their habitat. This means no development and no harsh lighting to be installed. They live there.</p> <p>Please prioritise making the town's open spaces friendly to wildlife - in terms of planting and leaving some areas wild. We have lost so much of our biodiversity in recent decades and the preservation of environments for our wildlife is a top priority for me.</p>
<p>C67</p>	<p>John Corcoran</p>	<p>The submission welcomes the content of Section 2.2.8, particularly the protection and enhancement of the Victorian building stock in Bray, the set piece that is the sea front and the promenade as well as the recognition of the valuable heritage asset that is Killruddery Demesne. The guiding principles of the heritage strategy are also welcome. Furthermore the submission welcomes the content of policy AH5 regarding Powerscourt Estate and Kilruddery demesne.</p> <p>With regard to Table 3.1 of the Draft Plan, the submission raises concerns regarding the inclusion of the Bray Head Hotel, Oldcourt House and Brook House in this table. Furthermore the submission objects to the inclusion of Kilruddery Demesne and Powerscourt Demesne in this table.</p> <p>In relation to Protected Structures the submission also requests the of 86 Main Street, birthplace of Cearbhaill O' Dalaigh to the list of protected</p>

		<p>structures and to modify 03-06 St. Patrick's Church of Ireland, Enniskerry, to add the interior to the listing.</p>
<p>C118</p>	<p>Aidan ffrench</p>	<p>The submission requests that a new objective for a cross-boundary Coastal Blueway Project between WCC and DLR be included in the plan: to construct a sub-regional Blueway between Killiney-Shanganagh Beach and Bray Harbour – Esplanade</p> <p>Potential Funding Source: Development Levies Schemes (WCC and Dlr) and EU Structural and EU LIFE-Nature grant schemes; E.I.B (European Investment Bank) €128million EU-wide Green Infrastructure-Biodiversity Programme; Fáilte Ireland tourism funding (Ireland's Ancient East); T.I.I (cycleway programme).</p> <p>Justification: local economy (eco-tourism: SME's – tourism and heritage guides/entrepreneurs, cafés, bike hire companies, etc.), Biodiversity action/All-Ireland Pollinator Plan, Smart Travel (cycling/walking), Climate Adaptation and Coastal Zone Management (resilience, cliff erosion management and reduction), Health & Well-being (active recreation, sports, leisure) and quality Blue-Green Infrastructure (amenity, eco-system service, etc.)</p> <p>Planning objectives: project would amplify and substantially enhance the Draft Plan's (7.2 Bray Harbour, pgs. 40-41) re-development policy statement/objectives, and thereby give real practical delivery of both WCC's county & Bray G.I Strategy & Objectives and neighbouring <i>Dlr Green Infrastructure Strategy</i> in respect of greenways, cycling, walking etc; with the L.E.C.P, Wicklow Outdoor Recreation Strategy and the Wicklow Tourism Strategy.</p> <p>Planning law: Section X, Planning & Development Act 2000 (as amended)</p> <p>Chapters 7, 9, 10, 11 Blue-Green Infrastructure – Open Space Audit & Strategy</p> <p>Include a new objective to undertake a comprehensive Open Space Strategy using U.K Best Practice Guidance (not specific planning or other guidance in RoIreland for Open Space Strategies). U.K city municipalities (e.g. Newcastle, Liverpool, Glasgow, Sheffield) and Dlr's Open Space Strategy 2011-2015 provide useful models, particularly in using PAN65 Planning Guidance, with 3-stranded Audit and Assessment Methodology - Quantity, Quality and Assessment, mirroring Department of Housing, Planning, Community & Local Government's general planning guidance on the provision of Open Space. The brief for any such audit research and O.S Strategy should focus on addressing the deficiency in open space and recreation provision and future needs, in the geographic area of the Municipal District and Urban Settlements of north Wicklow:</p> <p><i>Strengthen the spatial linkages between Bray and its environs.</i></p> <p><i>Provide an integrated approach to Blue-Green Infrastructure, Flood and Stormwater Management, Recreation, Sports-Leisure, Eco-Tourism, Land use, Smart Travel (cycling, walking, etc.).</i></p> <p><i>Provide guidance for the integration of the natural and built environment in Development Management (standard conditions, etc.)</i></p> <p><i>Provide an implementation strategy for Provision, Upgrading, Design and</i></p>

		<i>Maintenance of active, passive and natural Open Spaces.</i>
C120	Geraldine Flanagan	<p>The submission requests that in accordance with biodiversity objectives of the Wicklow County development plan 2016-2022 (10.3 Natural heritage and landscape biodiversity) which aims to "protect an individual tree, trees a group of trees or woodland which are of environmental or amenity value." Bray Municipal Plan needs to include for Tree Protection Orders the following trees and tree clusters in the town,</p> <p>Richmond Park: mature beech , ash, oak , birch on first green Clover Hill: large oak and hedgerow corridor Demesne planting: mature trees at Kilbride Hill House.</p>
C125	Paul Flynn	<p>The submitter lives on the Upper Dargle Road, Bray and his property backs onto the River Dargle. After the vegetation was removed along the riverbanks for the Flood defence scheme there was an increase in the number of people trespassing on the riverbank. Since the security measures were put in place for the flood defence scheme there has been a considerable drop in trespassers. His concern is that with the promotion of the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, that there will be a large increase in the amount of anti social behaviour. With opening up access to the general public to the back of the houses that face the river, it will prove to be a serious security risk to the residents in the area. He asks that if the river walk is to go ahead, that measures be taken to ensure the security of the residents by installing high security fencing, which will be adequate in preventing the burglary of the houses along the river. He knows that the plan is for a riverwalk along the south bank but the houses on the north river bank are easily accessed by crossing the shallow river in summer.</p> <p>The following objective is suggested: <i>7.4 The Dargle River</i> <i>Along the River Dargle, the following objectives shall apply: "To promote the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, through the development of a Dargle River Walk along the south bank of the river"</i></p>
C151	Aidan Hoey	<p>The submission advises that the grounds of Kilbride House, Herbert Road contain many trees some of whom are fine mature native Irish specimens. The submitter advises that from an environmental, aesthetic and noise pollution perspective point of view this area, indicated below, should have a Tree Preservation order.</p>

		
<p>C210</p>	<p>Raymond & Etain Murphy</p>	<p>Ireland, with the Netherlands, at 11%, are the two least forested countries in Europe, so anything we can do to protect our remaining trees is crucial.</p> <p>Anyone who knows Kilmacanogue knows that it lies in a wooded valley, and that there are wonderful trees everywhere – the ones that particularly spring to mind are those at Avoca Handweavers, those around the church, those along the road to Kilmurray Cottages and the group of Scots Pines on the Little Sugar Loaf side that you see as you drive across the motorway bridge. Now if we look at the Kilmacanogue Settlement Plan, only <i>one</i> tree is identified as having a preservation order on it. It stands in the area KM1, where it is proposed to build 25 new houses.</p> <p>There is a leaflet available at Avoca Handweavers (attached to submission) which tells the history of the original house on the site, Glencormac House, and its gardens. The leaflet lists the rare specimen trees there, among which is a Monterey Cypress, <i>the only mature specimen in the world of this tree</i>, and which has been described as ‘one of the outstanding trees of the British Isles’. The Eucalyptus Dalrympleana is <i>the largest recorded in the British Isles</i>. There is <i>an ancient avenue of 13 Yew trees – 12 are estimated to be about 800 years old and the 13th an amazing 2000 years old</i>, thought to be part of an old avenue leading to Hollybrook Abbey, long gone, which may have been a rest house for pilgrims walking to or from Glendalough. Then there are 3 extremely rare pine trees, the pinus palustris, one of which is <i>the tallest in the British Isles</i>. And so it goes on.</p> <p>This is obviously an extraordinary and unique collection of trees and, as such, deserves the highest protection</p>
<p>C233</p>	<p>Sugar Loaf Crescent Residents Association</p>	<p>This submission requests that under Section 4.3.2.4 ‘Trees’ of the LAP, the residents of Sugarloaf Crescent wish to apply for a preservation order on the large oak tree in the Vevay Temple Sportsfield, (on the Sugarloaf Crescent side of the field), under Section 45 of the Local Government (Planning and Development) Act 1963 and subsequent acts as amended. Part XIII of the Planning and Development Act 2000, as amended sets out the provisions for TPOs.</p>

C252	Nicola & Alan Ralph	This submission relates to the objection to the walkway on the River Dargle.
C257	Keith & Maeve Robinson	The submission requests that the Little Sugar Loaf should be included in: Schedule 10.6- Proposed Natural Heritage Areas in County Wicklow Schedule 10.10- County Geological Sites Schedule 10.14- Views of Special Amenity Value or Special Interest. The view of the Little Sugar Loaf from the R755 Road in Kilmacanogue village looking eastwards should be included.
C268	Teresa Steward and Peter Crisp	<p>The submission has advised that there are 400 year old oak trees surrounding the field proposed for development at Oldcastle and require a 15 metre zone to protect the roots from development.</p> <p>The submission welcomes the recommended greenway along the Swan River and advises that there are trees of historical importance at the bottom of Charnwood Estate. It is requested that these along with the mature hedges, trees and embankment should be retained under the objective that existing mature trees and hedges should be preserved along with an adequate buffer zone between any developments in any planning application. This would ensure that the impact of the new development would be minimized, as well as providing a natural barrier between our estates. (Wicklow Green Infrastructure Development Plan Strategy: NH3, NH14, NH19).</p> <p>Notes on special nature of trees. The oak trees on both sides of the field are hundreds of years old, and are part of the original Oldcourt Demesne and which are shown on the old 6" maps, upon which many Tree Protection Orders exist, namely on the trees by the river, on the other side of the field marked for development. Being large and mature trees, they would be expected to support a wide variety of biodiversity and enhance the overall environment.</p> <p>Suggested easement of 15 metres The submission requests for an easement of minimum 15 metres exclusion zone to the development boundary would be appropriate to protect the trees on both sides of the field, our side and the river side, in order to protect their root base. This would also make a barrier between our estate and the new estate, and ensure new residents don't request the trees are removed due to health and safety.</p> <p>Suggested retention of existing embankment at end of gardens: recommended as flood prevention for field earmarked for development The existing embankment on which the hedges grow beside the trees is about 4 or 5 feet high, and acts as a natural water barrier between the estate and the field. If it was removed more water would run down the estate into that field. Every year more homes pave their front gardens, and we are already seeing water gathering in front of the embankment and in front of the houses, as run-off grows. In view of predicted increases in heavy rainfall events the submitters suggest these embankments be retained.</p>

Opinion of Chief Executive

Architectural heritage and Record of Protected Structures

As part of the plan making process it was determined that the housing targets could not be met on brownfield sites and the consideration was given to new 'greenfield' zoning. In order to meet the housing targets of the regional and county plan and provide for new housing, it has been necessary to zone 'greenfield' lands. Detailed consideration was given to whether some or all of the lands at Bray Head Hotel, Oldcourt House, Oldcourt Castle, Brook House and Kilruddery Demesne, would be suitable for new residential development, and it was determined that a certain portion could be developed, without giving rise to adverse impacts on the heritage of these locations. Notwithstanding the zoning on these lands, the priority remains the protection and conservation of these valuable heritage assets.

The structures listed above are all on the Record of Protected Structures (RPS). In accordance with Objectives AH1, AH2, AH3, AH4 and AH5 of the Draft Plan and objectives BH9, BH10, BH11, BH12, BH13 and BH14 of the County Development Plan, the Council is committed to the protection and enhancement of the heritage value of these structures.

With regard to the definition of the curtilage associated with the protected structure Kilbride Hill House, it should be noted that it is not the function of the LAP to define the curtilage of a protected structure. This may be done through the review of the record of protected structures. It should be noted however that it has not been our practice during the review of the RPS to define the curtilage of a structure unless a detailed study has been undertaken of the curtilage. As advised in section 10.2.3 of the County Development Plan, *'The definition of a 'structure' or 'a specified part of a structure' for the purpose of the RPS includes "the interior of the structure; **the land lying within the curtilage of the structure; any other structures lying within the curtilage of that structure and their interiors;** and all fixtures and features which form part of the interior or exterior of the structure"*. It is considered that this definition plus the objectives in the County Development Plan and associated objectives of the Draft Plan gives protection of the Act to the curtilage of any protected structure.

Furthermore Section 57 (2) of the Planning and Development Act 2000 (as amended) states that *'An owner or occupier of a protected structure may make a written request to the planning authority, within whose functional area that structure is situated, to issue a declaration as to the type of works which it considers would or would not materially affect the character of the structure or of any elements, referred to in subsection (1) (b), of that structure.'* Therefore any queries in relation to the curtilage of a protected structure can be dealt with under this process.

Adding a structure to the Record of Protected Structures (RPS) is carried out through a separate process to a LAP, therefore additions to the RPS cannot be considered as part of this plan making process. However, it is intended that all such requests will be considered in an overall review of the RPS in late 2017/ early 2018. With regard to the preservation of the Esplanade Hotel, this building is afforded protection as a Protected Structure (B82). The promenade in Bray is listed in the National Inventory of Architectural Heritage (NIAH). The assessment of any development to the hotel or the promenade will have due regard to the heritage objectives contained in both the Draft Plan and the County Development Plan.

Many submissions raised concerns regarding the protection of Bray's Architectural Heritage generally. Section 9.1 of the Draft Plan details objectives relating to the protection of architectural heritage in the Bray MD and these should be read in conjunction with the heritage strategies, objectives and standards set out in the Wicklow County Development Plan (Chapter

9).

With regard to Bray Seafront, Wicklow County Council is committed to protecting, maintaining and improving the heritage of this area. The Council has invested significantly in the improvement of the area and protection of features of heritage value and is committed to investing and maintaining all components which are within its own remit. It is considered that modern additions to the area can be successfully integrated into the area without adversely damaging its heritage and in fact, modern interventions, rather than pastiche imitations, are preferable. In this regard, there will be presumption in favour of further enhancement of the visual and recreational amenities of the area, even if this means some modern interventions, to ensure ongoing usability and safety of the area.

Architectural Conservation Areas (ACAs)

The quality of shopfronts within Bray Main Street and surrounding side streets is accepted as being relatively poor. It is agreed that ACAs can provide guidance with respect to visual and architectural treatments; however policies and objectives relating to ACAs will only apply to proposed developments and will not apply to the impacts caused by existing shopfronts and businesses. Similarly the designation of an ACA would not resolve any perceived neglect and dereliction currently experienced on the Quinsborough Road. There are many protected structures in the Bray MD which are afforded protection yet are currently vacant and derelict and in need of development. The Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development such as the application of the vacant sites levy etc. and encouraging development that will add vibrancy to the businesses in the central core of Bray.

While it is agreed that the ACA designation is not as onerous as the RPS designation and would allow property owners more flexibility with the interior of buildings it is considered that any buildings worth protecting have already been designated as a protected structure.

The planning authority is reluctant to consolidate ACAs as it is felt that this would discourage development in the Town Centre. It is considered that the town centres in the MD are in need of regeneration; indeed the dimensions of many of the shops in Main Street are not suitable for modern retailing, and therefore the Council will support the redevelopment of sites and structures in the town centres which positively contributes not only to the heritage value, but also the commercial and residential vitality of the town centre. It is considered that the key to protecting such structures (or groups of structures) is to find ways to protect their physical integrity and maintain their viability. In this regard, there will be presumption in favour of the active use of heritage buildings, even if this means some modern interventions, rather than preserving them forever in the past, which can ultimately result in the structure being unusable and falling into dereliction. With this in mind each planning application will be assessed on an individual basis and considered on its own merits.

Town Centre

The heritage value of the town centre in Bray is noted by the Council. The quality of some buildings on Bray Main Street and surrounding side streets is accepted as being relatively poor. In addition, some parts of the centre have suffered from degrees of vacancy. It is a priority of the Planning Authority to facilitate development that would contribute to the improvement of the overall appearance and aesthetic appeal of the streetscape, including for example shopfront improvements, regeneration of vacant sites and public realm improvement schemes.

As noted in Section 2.2.5 of the Draft Plan, it will be the objective of the Council:

- To promote and encourage consolidation of and improvement to retailing and other town centre activities in the core areas of the three towns in the district including the renovation and expansion of existing retail premises in the core retail area.
- Encourage the redevelopment and regeneration of vacant, underutilised and derelict sites including the conversion of non-retail premises in the core area to retail use.
- To protect features that contribute to the towns' overall appearance and heritage value.
- To encourage higher residential densities in the town centre zones and the concept of 'living over the shop'.
- The redevelopment of lands within the town core area, particularly those sites with frontage onto the main streets and squares of the towns, shall provide for a street fronting building of a high quality design or for a high quality urban space, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape.

With regard to property nos. 6, 7 and 8 Eglinton Road, these buildings form part of the new Florentine Centre development. The Council purchased these in the condition they are in at present, have carried out limited works to make them safe, and will be tendering these along with the rest of the Florentine site to interested developers to refurbish these buildings in accordance with the planning consent approved by An Bord Pleanála.

Historical & Cultural Heritage

Concerns regarding the impact of the proposed rezoning at Kilruddery and Oldcourt are understandable. Every opportunity to meet the housing growth target from brownfield sites was taken. The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; therefore, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands. The priority for such zoning is land in the existing built envelope of Bray, at its immediate periphery and at Fassaroe. Detailed consideration was given to whether some or all of the lands at Kilruddery and Oldcourt would be suitable for new residential development, and it was determined that a certain portion could be developed, without giving rise to adverse impacts. It is considered that the new zonings will provide significant buffers and public open space in keeping with the existing amenities of the area.

Notwithstanding this change in zoning on the Killruddery lands and at Oldcourt, the priority for these areas remains the protection and conservation of the valuable heritage assets.

Biodiversity

The suggestion to preserve Bray Harbour as a nature reserve and add the Little Sugar Loaf to the list of Proposed National Heritage Areas (pNHAs) has been evaluated, however the harbour is currently a developed operational harbour welcoming pleasure boats and

contributing to tourism in the area, therefore a nature reserve is not considered in this area. With regard to pNHAs, these are designated by the Minister and do not form part of the remit of a LAP.

It should be noted that the Council is committed to preparing a masterplan for the harbour area, in consultation with other landowners and harbour users, and this process has already commenced. The objectives for the harbour are clearly set out in Section 7.2 of the Draft Plan.

The design of any new development will be required to accord with the highest design and environmental standards, in accordance with the provisions of the County Development Plan, the various design guides produced by the Minister, environmental legislation and best practice. The impact of any new development on the heritage of the area and the natural environment will of course be paramount in the development of design for new development in this area.

Woodlands, Trees and Hedgerows

With regard to the protection of trees, it is an Objective B4 of the Draft Plan:

'To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network.'

Furthermore the County Development Plan also sets out the following objectives:

To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in Schedule 10.08 and Map 10.08 A, B & C of this plan.

To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high value, where it appears that they are in danger of being felled.

Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged.

To discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling where possible.

To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments.

To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).

Submissions noted that some trees on demesne or estate lands were chosen with regard to their ornamental features and do not comprise of native species and are of limited lifespan. As noted in Section 10.3.3 of the County Development Plan, it is an objective of the Council to protect trees, in particular native trees and those trees associated with demesne planting as they are not only an environmental and forestry resource but are also of significant amenity value.

It is considered that submission no. C7's request to amend Object GI4 of the Draft Plan is acceptable and should be amended as follows:

"To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, where considered to be viable, safe and in line with sound arboricultural management, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan".

While many submissions requested Tree Preservation Orders on a number of trees in the municipal district, the Planning Act does not allow for a Tree Preservation Orders to be made through the local area plan process as Section 205 of the Planning Act has its own separate process. It is recommended that a review of the TPO list is undertaken post adoption of this LAP, perhaps in conjunction with the planned review of the RPS.

The trees identified at Avoca Handweavers are already subject to a TPO (No.2 of the CDP Trees at Avoca Handweavers, Glencormick South, and Kilmacanogue). It is acknowledged that there are other trees in Kilmacanogue that are worthy of protection in some cases and it is considered that the following objectives of the County Development Plan seeks the protection of such trees, NH18 *"To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments"*.

It should be noted that the Council is committed to ensuring sustainable recreational use of the outdoors in County Wicklow. The exact route for the proposed greenway developments are not yet known so detailed ecological assessment for impacts on important ecological features, such as trees, including general ecological impact assessment and specifically Appropriate Assessment, only be carried out when these routes are designed. The detailed design of these schemes will need to take into account the relevant ecological features in proximity to the proposed routes and the potential for impacts arising from the routes will need to be taken into account including both construction and operational phases.

Soils & Geology

In 2014, the Council in partnership with the Irish Geological Heritage Programme of the Geological Survey of Ireland, assessed the geological heritage of Wicklow and identified the most important sites which are worthy of protection as County Geological Sites. The Council will seek to maintain and where possible enhance the geological heritage values of these sites. There are 62 sites on the list with the Great Sugarloaf included, while the Little Sugar Loaf was not included and there are no plans to update this list or to include the Little Sugar Loaf.

Green Infrastructure & Recreational Use of Natural Resources

Kilbride Hill House

Kilbride Hill House and grounds is zoned 'RE' in the draft plan, reflecting its existing residential use. Such a zoning would allow for new infill residential development if deemed appropriate

given the characteristics of the site and the area.

In the 'green infrastructure' map associated with the draft plan, GI 'assets' are indicated. This is not a 'zoning' map and lands shown as say 'open spaces and parks' might include currently undeveloped land, even if said lands are zoned for new development. However, this is not applied consistently across the plan area, in error. It is agreed that this is confusing and anomalous and therefore the GI map is recommended to be revised to omit lands that are identified for new development, as these are not intended to be 'retained' as GI assets. That said, the objectives of the plan, in conjunction with the provisions of the County Development Plan, will ensure that any green assets such as mature trees, on any development site, will be protected to the degree that is necessary and appropriate on any site.

One of the submissions has requested that an objective for a cross-boundary Coastal Blueway Project between Wicklow County Council and Dun Laoghaire Rathdown County Council be included in the plan. The development of such a blueway is facilitated with the general objectives of the County Development Plan and in particular Objective T34, however the delivery of an inter-county initiative is not within the remit of the LAP. An objective seeking the provision of an inter-county blueway may be better suited to the Regional Plan.

With regard to the request for an objective for an Open Space Audit and Strategy it is considered that Open Space is adequately addressed, facilitated and protected in both the Draft Plan and the County Development Plan. A number of greenways have been identified in the plan which is deemed acceptable.

Concerns regarding antisocial behaviour as a result of the proposed river walk along the south bank of the River Dargle and the greenway proposed along the Swan River have been considered by the Council. Issues of antisocial behaviour are not matters for a landuse plan. It should be noted however that the proposed greenway routes are not yet determined so detailed assessment for impacts on existing residents and the proposed lands, is best carried out when these routes are designed. The detailed design of these schemes will need to take into account both the construction and operational phases. Members of the public will have a chance to make further submissions when proposals come forward for the exact route and design.

Views & Prospects

It is noted that two submissions request the preservation of The People's Park and that the view from the People's Park up towards the mountains should be protected. Another submission requests the view of the Little Sugar Loaf from the R755 in Kilmacanogue village looking eastwards should be added to Schedule 10.14, Views of Special Amenity Value or Special Interest.

There are currently no proposals in the Draft Plan for the People's Park. Having considered the request to protect views of the mountains from The People's Park and the R755 it is considered the views proposed are limited and fleeting and partially blocked by topography, vegetation, and existing development and there doesn't appear to be a particular 'viewing place' which is worthy of protection. Furthermore it should be noted that there are no proposals or objectives in the Draft Plan which would result in development that would impact on views of the mountains from either The People's Park or from the R755.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No. 10 as detailed in Part II of this report (p28)
2. Amendment No. 22 as detailed in Part II of this report (p51)

SECTION 3.16 OPPORTUNITY SITES

This section of the report deals with the submissions that have been made with respect to Opportunity Sites.

Sub No.	Issues raised
C11 Beralt Developments Ltd	<p>This submission is made by Beralt Developments Limited is a wholly owned subsidiary of the Grafton Group, and is the owner of the former Heiton Buckley site on Castle Street, Bray.</p> <p>Whilst the Town Centre zoning objective and the designation of the site as an "Opportunity Site" in the Draft Plan is welcome, it is put forward that some of the objectives relating to the site are overly restrictive and will ultimately inhibit its redevelopment. The purpose of this submission is:</p> <ol style="list-style-type: none"> 1. It seeks to alter the plot ratio requirement of not less than 2. 2. It seeks to alter the setback requirements along Castle Street. 3. It seeks to alter the requirement for active street frontage where any proposed development would adjoin existing streets.
C21 Bray Retailers Group	<p>The Bray Retailers Group is confident that the development as proposed for the Florentine Centre in Opportunity Objective OP1 will significantly enhance the destination for shopping and leisure in the Main Street and Town Centre.</p> <p>Furthermore, the opportunities for development of premises on and off Castle St as expounded in Opportunity Objective OP2 and OP3 should be fully grasped to change the area into a high quality high density residential and mixed-use built environment. The notion of 3 to 4 storey development is again pandering to a modest view of growth, when these are the sites well positioned for significant density on a path of more sustainable development.</p>
C39 O. Fenelon - Byrne	<p>With respect to the proposed development of the Florentine Centre, and the impact that this development will have on existing residents in the immediate surrounding area of that location, there is insufficient detail or commitment provided within the plan regarding minimising the impact that this development will have on these residents. Can more detail be provided as to how this balance between retail development and urban residents will be established and preserved?</p>
C66 T. Cookson	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>
C188 J. McCormick	<p>Taking an organic/sequential approach, the remaining significant infill and opportunity sites around Bray e.g. the old golf club, Castle Street, Rockbrae and Dell sites, and mid-Boghall Road/Southern Cross sites , should be developed first (at a mid-high level density), before the rural /greenbelt fringes are re-zoned and/or highlighted for development under an LAP.</p>
C261 M. Rogers	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town</p>

centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.

Opinion of Chief Executive

General

As part of the plan crafting process, all derelict, abandoned or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development. Every opportunity to meet the housing growth target from such sites was taken, and in the majority of cases, a high density objective applied e.g. Heitons, former Dawson's, Dell, FCA, Brook House, Presentation College, Oldcourt, Ravenswell, Everest, The Maltings etc. The draft LAP also makes specific provision for infill on existing developed land in the town centres and living over the shop (Objective R4). The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development, application of vacant sites levy etc.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; however, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands, particularly focused on Fassaroe. It is intended that development at Fassaroe will be of a high density, in order to minimise the land take required.

OP1: Florentine

The support of the Bray Retailers Group is noted.

With respect to the submission from Orla Fenelon, it is the role of the LAP to set out a development framework for any site / lands but not to provide detailed management measures to apply if and when the lands are developed; mitigation measures can only be designed once the design of the development is known. This is the type of detail that is contained in the planning application – consent documentation, and such detail was available for the public to view and comment on at the time of the application to An Bord Pleanála for consent.

OP2: Former Heiton Buckley

With respect to the changes requested:

1. The submitter sets out reasons why a plot ratio of 2 would not be possible to achieve on this site, given the need to set back any development thereon from adjoining properties and the need for significant surface car parking. This plot ratio requirement was developed on the basis of 50% of the area of the site being covered by 4 storey buildings and surface car parking being limited, given the town centre location, in an area served by a high quality bus corridor, within 1km of the DART. The vision for this site, along with the Everest site adjacent, is for a mixed use development with commercial uses / shops fronting onto Castle Street, with residential use above.

The attractiveness of this area is already somewhat diminished by the large car park on the opposite side of the road and it is considered important that the streetscape on the east side of the street is reinstated, reinvigorated with new active frontage and an improved sense of place / improved urban realm is delivered. This cannot be achieved through the provision of a low density single unit surrounded by a sea of car parking, which appears to be the submitter's vision as evidenced by the submission and recent (unsuccessful) application for the development of a discount retailer on this site, with a single building, surrounded by car parking.

Nevertheless, it is agreed that an overly prescription plot ratio may not be conducive to development, and therefore it is considered that this may be omitted, subject to more explicit criteria being applied about the mix of uses expected.

2. It is put forward that the set back requirement of 5m/15m is unrealistic given sightline requirements. However, this argument is not supported by evidence, as a building within 5m of the kerb at this location would not be likely to interfere with the line of sight from any exit measured from 2m back from the road edge but in the event it did, up to a 15m set back could be considered, which would definitely not provide any kind of obstruction.

The set back requirement of 5m is set out on the basis of the new development having a 'streetscape' along the existing footpath, similar to the buildings further south along Castle Street, closer to the bridge. The existing buildings on the site follow this building line. Nevertheless, in order to allow for any issue that might arise for traffic safety reasons for example, a setback of up to 15m could be considered, subject to adequate justification. This is the set back of the buildings on the site immediately adjoining to the north. No change is therefore recommended.

3. It is put forward that it is not reasonable to expect active street frontage onto Dwyer Park. This is accepted.

With respect to the submission from the **Bray Retailers Group**, it is agreed that the opportunities for development of premises on and off Castle Street should be fully grasped to change the area into a high quality high density residential and mixed-use built environment. With respect to their concerns regarding height, the height of 3-4 storeys suggested in the plan is intended to reflect the prevailing character of the area (which is mostly 2 storeys) and to ensure excessive adverse impacts are not created, particularly on surrounding residences.

OP3: Former Everest

With respect to the submission from the **Bray Retailers Group**, it is agreed that the opportunities for development of premises on and off Castle Street should be fully grasped to change the area into a high quality high density residential and mixed-use built environment. With respect to their concerns regarding height, the height of 3-4 storeys suggested in the plan is intended to reflect the prevailing character of the area (which is mostly 2 storeys); however given that the Everest site is not bounded by existing residences, it is possible that additional height could be accommodated on this site. A slight change is therefore recommended.

Chief Executive's Recommendation

Amend the draft plan as follows:

Amendment No. 3 , as detailed in Part II of this report (p18)

SECTION 3.17 (a) FASSAROE

This section of the report deals with the submissions that have been made with respect to Fassaroe.

Sub No.	Issues raised
C8 Ballywaltrim & Wingfield Residents Association	Concerned by the possibility that the Fassaroe area (Chapter 10) may be developed for residential and industrial use prior to the establishment of a public transport facility for this area, as up to 3000 cars may be decanted onto the N11 from this development.
C18 Bray & District Chamber of Commerce	<p>The Chamber supports the rapid delivery of the maximum number of good quality housing units in Fassaroe. The units need to be of mixed sized and of a high quality build, Consideration would be given to blocks of apartments of 4, 5 6 storeys and greater where appropriate.</p> <p>Fassaroe should have minimal retailing space if the intention is, as stated, to improve the retailing and other town centre activities in the core area i.e. to encourage the use and business in the existing core centres of Bray Enniskerry and Kilmacanogue and the integration of what will be new residents into the community of north Wicklow.</p>
C21 Bray Retailers Group	The Bray Retailers Group is in agreement with the zoning of the land reserve in Fassaroe for future residential development. The priority however should be to progress the redevelopment of opportunity sites on Castle Street and the development of the golf course lands. These new residential developments should be on condition that the necessary infrastructure is in place.
C68 Cosgrave Property Group	<p>Cosgrave Property Group (CPG) is the owner of significant lands within the Fassaroe area which falls within the Bray Municipal District area. A planning application for a first phase of development within these lands was recently the subject of a decision to grant permission by Wicklow County Council (Reg. Ref. 16/999). This decision is currently on appeal to An Bord Pleanála.</p> <p>Overall, CPG is supportive of the overall strategy and approach to development within the Bray Municipal District in general and Fassaroe specifically as proposed within the draft LAP. There are a number of matters of detail within the Draft LAP however which they consider are inconsistent with the nature and extent of the Phase 1 development which has already been the subject of a decision to grant permission by Wicklow County Council. They present a number of suggested modifications to the Draft LAP which will ensure consistency with the Phase 1 application development which also will allow for the future logical delivery of development on the remainder of the lands.</p> <p>1. Clarification of zoning naming</p> <p>Map No. 2 of the Draft LAP (the Land Use Zoning Map) identifies land zoned for the purposes of 'NC Neighbourhood Centre'. There are also other NC zoned areas and 'TC: Town Centre' zoned areas within the overall Bray MD lands shown on Map No. 2. There are no lands identified as being zoned 'VC: Village Centre'. The zoning table in Chapter 11 of the Draft LAP however includes objectives for 'TC: Town Centre' and 'VC: Village Centre', but does not include an objective for NC: Neighbourhood Centre. It is noted also that the lands at Fassaroe are referred to as 'VC' in the Concept Plan at Chapter 10 of the Draft LAP.</p> <p>Proposed Modification No. 1</p> <p>It is requested therefore that the zoning objectives and naming as used on Map No. 2, the zoning table in Chapter 11, and the concept plan be properly co-ordinated and clarified.</p>

2. Extent of NC / VC zoning in excess of primary objective

The Draft LAP identifies approximately 6 hectares as Neighbourhood Centre / Village Centre within Fassaroe. Within this overall 6 hectares, the Draft LAP proposes the provision of a Level 4 Neighbourhood Centre; 75 No. residential units on 1 hectare; as well as a multi school campus. CPG notes that the primary purpose of a Town, Neighbourhood or Village Centre as outlined in the Land Use Zoning table of Chapter 11 of the Draft LAP is to provide for the development and improvement of the core town / neighbourhood centre uses include retail, commercial, office and civic uses as well as living over the shop or other ancillary residential uses. CPG further notes that under the 'typical appropriate use' listings in Chapter 11 (page 72) of the Draft LAP, education use is not a generally appropriate use in town or village centres. Education use is provided for as generally appropriate within 'residential' or 'community and educational'. On Zoning Map 2, the 'CE: Community & Education' zoning objective appears to be used for sites of existing community and education uses. It seems in general then that the Planning Authority acknowledges that new school facilities are most appropriately and indeed most likely to be provided within residential zoned lands.

CPG notes that the decision and responsibility for the delivery of a school will rest not with future Developers but with the Department of Education and Skills (DES). It is the responsibility of the DES to plan for the timely delivery of schools in line with the delivery of housing. The DES will identify at the appropriate time its preferred school location based on local circumstances at the time. It is possible based on various site suitability criteria that the DES will identify lands not included within the proposed NC /VC zoning at Fassaroe.

Based on the foregoing it is submitted that the extent of land currently identified for Neighbourhood Centre / Village Centre at Fassaroe is well in excess of the primary objective to provide for Level 4 retail and commercial uses along with ancillary residential. Furthermore, the western half of the proposed NC/VC zoning is already subject of a decision to grant housing under the current Phase 1 application Reg. Ref. 16/999. This should therefore be excluded from the proposed NC / VC zoning area.

It is also unlikely that a school campus could also be accommodated within the residual area between the neighbourhood centre and the residential area proposed in the current application. It is therefore more appropriate and practical that the LAP will make provision for the identification of a school site by DES on residential zoned land in the vicinity of the neighbourhood centre.

The provision within the lands for 75 No. dwelling units as provided for in Table 3.1 would represent an underutilisation of the residual land in this area. It is suggested that these concerns be addressed by the following modifications to the Draft LAP.

Proposed Modification No. 2

It is requested that Wicklow County Council restricts the extent of NC/VC zoned land to the eastern half of the NC/VC lands as currently proposed and zone the remainder (the western portion) R-HD -New Residential – High Density to reflect the content of the Phase 1 development already subject of a decision to grant permission by Wicklow County Council. While this proposal would result in an increase in residential zoned land within the overall Fassaroe lands (from that proposed in the Draft LAP), it would have no net effect on the overall quantum of land available for housing, as it would still be necessary to provide for a school campus site elsewhere within the overall residential zoned land.

Proposed Modification No. 3

Omit the reference to in Table 3.1 of the Draft LAP to 75 No dwellings only being provided within the NC/VC zone

Proposed Modification No. 4

Revise Item 7 of the Fassaroe Concept Plan at Chapter 10 to provide that lands should be reserved for the future development of school accommodation in the vicinity of the village centre on R-HD lands; the location and scale of which to be agreed with the Department of Education and Skills.

3. Phasing

The phasing suggested in the Draft Plan is based on two general phases. Phase 1 is identified as generally to the east of the major open space and including the village centre and the reservation of a school site to be agreed with the DES; and the three easterly blocks of new residential development. Phase 2 is generally to the west of the major open space which should only be commenced when the delivery of 20 ha of major open space is well underway. We request that this suggested phasing approach be altered. As currently provided it would be inconsistent with the nature and extent of development already subject of a decision to grant permission by Wicklow County Council under Reg. Ref. 16/999. In general it would also likely result in practical impediments to the timely and orderly delivery of development at that overall Fassaroe lands. An alternative sequential approach focused on the new neighbourhood centre to be provided at Fassaroe would be a more appropriate general phasing approach to be adopted than sequentially from the M11 which appears to be the basis of the Draft LAP phasing proposals.

Practical implementation issues

As noted above, the overall development lands are currently the subject of a planning application which includes for a central neighbourhood centre, a distributor road connecting through to the N11, development at the employment lands to the east, residential development on lands on the western extent of the VC lands as now proposed, and residential lands to the west of the OS1 lands. This particular distribution, nature and extent of development presented within that application was partially in response to the provisions of the 2010 Masterplan for Fassaroe but also in response to practical implementation matters arising at the subject lands.

In the first instance it is noted that both the 2009 Bray Environs Local Area Plan as well as the current Draft Bray MD LAP require the provision of a link road through the area from Bray to Enniskerry. To provide for any new development at Fassaroe it is necessary to provide this full link road through to Ballyman Road. This link road serves the neighbourhood centre and runs primarily through residential lands in the northern portion of the overall Fassaroe lands. It crosses the area of major open space. It is reasonable and logical that development be permitted sequentially from the neighbourhood centre, OS1 lands and the alignment of the link road. This is the order of development provided for in the recent decision to grant permission Reg. Ref. 16/999 by Wicklow County Council and which should now also logically be provided for in the new Bray MD LAP.

It is also noted that future development of the lands to the north of the village centre will be affected by the proposed north-south link route from the new distributor road to cross the Ballyman Glen and to link up with Old Conna Avenue. The nature and function of this route, as recorded at item 3 of the Concept Plan in the Draft LAP is currently undetermined. It is assumed that such details may be clarified in the proposed Local Transport Plan for Bray & Environs, which is still in the process of being prepared by the NTA. However this is

not assured and indeed the timing of completion of this Plan is not defined or determined. Accordingly, there are potential practical impediments to bringing forward development proposals on the north-west residential quadrant in the immediate term. In this regard, while parts of the residential block to the north of the village centre may be possible to develop in a first phase, it is possible that there could be design difficulties attached to fully developing this area in the short term pending confirmation of the nature of the North-South link.

In practical terms, phasing of development will also be influenced by landowners. CPG is in ownership of the full extent of the proposed link road to Ballyman Road. As full delivery of this infrastructural element is required to facilitate any development at the site, it is necessary that delivery of substantive development within CPG lands can also be delivered alongside and within the same phase as this road, as already acknowledged by Wicklow County Council in the decision to grant permission under Reg. Ref. 16/999.

Having regard to all of the foregoing then in practical terms the northwest quadrant of residential zoning becomes a necessary and practical element of first phase development. The Neighbourhood Centre (or part thereof) and OS1 become practical and appropriate elements of Phase 1 also.

Principles of sequential approach

From the content of the Draft Bray MD LAP, the rationale for the particular phasing approach suggested is not clear. Given that it proposes development to the east firstly followed by development to the west thereafter, it is assumed that it may be based on proximity to Bray town. In this regard we note that Wicklow County Council in general support the phasing of development in accordance with the sequential approach. This is confirmed at P73 of the Draft LAP.

We note and support the general principle of sequential development. In the case of the major new development at Fassaroe this sequential approach should be based on the core community and infrastructural elements of development that will be provided as part of the initial development of the site, and as provided for in the current phase 1 development proposal under Reg. Ref. 16/999. This includes as set out above a neighbourhood centre, a major open space area and a link road through to the N11. The overall lands at Fassaroe while forming a new growth centre for Bray, will also in themselves form a new major development zoned focus on a central neighbourhood centre and district open space.

Proposed revised phasing provision

CPG requests that the phasing proposals in the Draft LAP be revised to provide for a more site appropriate sequential approach based on these principles and on the extent of development already subject of a decision to grant permission. On the basis of the foregoing and also have regard to key elements of the phasing approach identified by the Planning Authority in the Draft LAP CPG accordingly requests that Item 1 of the Concept Plan for Fassaroe which relates to phasing be altered.

Proposed Modification No. 5

Item 1 of the Concept Plan should be modified as follows:

Development shall be carried out in phases in the following general manner. It is possible that there will be overlap between Phase 1 and Phase 2 and between Phase 2 and Phase 3.

Phase 1 Distributor Road, Village Centre, Adjacent Northwest and Northeast Residential

Blocks, Northern Open Space

- *This will include the provision of the main east west link road; the 'village centre'; residential development adjacent to the spine road including the northwest residential block and the northeast residential block (or part thereof) shown in concept plan above. The northwest residential quadrant will only be developed in tandem with the delivery of the northern portion of the major open space and with the delivery of residential and village centre development to the east of the OS.*
- *Phase 1 will include development on employment areas adjacent to distributor road.*

Phase 2 Southeastern Residential Blocks

- *This phase will see the completion of the northeastern residential block (pending agreement on the nature and route of north-south link) and the delivery of the two southeasterly residential blocks. It will include at a minimum the reservation of a site for a school campus. The timing of delivery of the school will be determined by the Department of Education and Skills, but expected to be delivered within this phase. This phase will also include agreement on the design of the southern portion of the major open space.*
- *Further employment development.*

Phase 3 Southern Open Space and Southwestern Residential Block

- *No residential development may commence in the southeastern block until the delivery programme of the southern portion of the major open space is well underway and will be completed by the time housing units are ready for occupation.*
- *Completion of employment development.*

4. Zoning objectives and boundaries**(a) Major open space**

It is noted that the boundary of the proposed OS1 open space area illustrated on the Land Use Zoning Map of the Draft LAP extends into an area of residential development already subject of a decision to grant permission by Wicklow County Council which was in line with the zoning boundary provided for under the Bray Environs LAP 2009. While CPG acknowledges that these boundaries are not prescriptive, we respectfully suggest in the interest of consistency with the scheme approved by the Wicklow County Council Decision to Grant that the western boundary of OS1 land reverts to its original location illustrated in the Bray Environs LAP 2009

Proposed Modification No. 6

CPG therefore requests that the new Bray MD LAP maintain the existing western boundary line for the major open space area in the northern part of the lands.

CPG notes that the Concept Plan at Chapter 10 of the Draft LAP provides guidelines for open space provision at the Fassaroe lands and requires that the overall provision for major open space (including OS1 and AOS) shall be 20 ha. It is submitted that the extent of OS1 and AOS illustrated on the Land Use Zoning Map of the Draft LAP is well in excess of 20 hectares. (We have measured this at approx. 30 hectares as illustrated). The proposed boundary revision then could easily be accommodated while also maintaining the objective to provide a total of 20 ha of open space at both the OS1 and AOS lands combined.

(b) E – Employment lands – uses

Chapter 11 of the Draft LAP sets out proposed land use zoning objectives and sets out 'typical appropriate use' provisions for variously zoned lands. We note the 'typical

appropriate use' provisions for 'E: Employment' zoned lands at Page 72 of the Draft LAP. While CPG recognises that the uses listed are typically appropriate in employment zones, in the case of Fassaroe it is submitted that consideration should also be given to including hotel uses within the general appropriate provisions. Given the overall layout and context of the development lands at Fassaroe it is considered that the provision of a hotel within the E-Employment zoned lands could potentially deliver a high quality gateway feature development for the overall lands. In terms of its overall setting within the wider context of Bray this would also be a suitable location.

Proposed Modification No. 7

It is proposed that the provisions at Page 72 of the Draft LAP for generally appropriate uses for 'employment' zoned lands be amended with the provision of a sentence as follows:

"In the case of employment zoned land at Fassaroe, consideration will also be given to accommodating hotel use".

(c) Development Standards

CPG notes in the 'Introduction' section of the Draft LAP that it is proposed that development standards set out in the County Development Plan shall apply to development within the Bray Municipal District unless otherwise specifically provided for within the LAP.

As a major new growth centre for Bray and indeed for the Greater Dublin Area, it is respectfully submitted that some of the general development standards set out in the County Development Plan may not be appropriate for the subject lands. The lands at Fassaroe will be a high density development typical of high densities within other major development areas in the Greater Dublin Area including Dun Laoghaire Rathdown, Dublin City, South Dublin, Fingal, Meath and Kildare. In this regard development at Fassaroe will be more comparable with development in parts of Dun Laoghaire Rathdown County for instance than say southern parts of County Wicklow. On this basis it is submitted that some development standards that may be appropriate elsewhere in the County may not be suitable for development at Fassaroe.

In particular we note the private open space provisions of the Wicklow County Development Plan are potentially significantly in excess of requirements of other planning authorities for major growth centres in the GDA.

In the case of a proposal for a house size of 155sqm, for example, this would result in average private open space requirement of 99sqm. Clearly in a development of the scale of 3,700 dwellings approx it will be necessary and appropriate to include some provision of such scaled houses and indeed possibly larger also.

Considering the general approach to density and private open space within the overall County Development Plan, it is acknowledged that these development plan provisions work well for the typical scenarios provided for in the development plan, which generally allow for lower density development and where higher density is identified it is generally houses of a small size. In this regard, we have reviewed various Town Plans and Local Area Plan throughout Wicklow, and in particular have reviewed typical and maximum densities identified for new development. Typical densities on strategic sites for new development in towns of Wicklow are generally 15 or 20 units per hectare, and occasionally rising to 22 units per hectare. On some town centre sites the maximum densities on occasion extend to 40 units per hectare. Within higher density designated sites 40 – 50 units per hectare in

town centre or edge of centre sites the various plans within the county envisage delivery of these units in the form of apartments or modestly sized housing of 100sqm approx.

Thus under the scenarios within the development plan in which higher density housing is envisaged (i.e. 100sqm houses at 50 units/ha), the private open space requirement would be 64sqm. If larger units and garden sizes were provided (e.g. 200 sqm houses with 128sqm gardens) on such higher density areas, the appropriate density provided for is typically 25 units/ hectares.

On lower density designated sites (15, 20 and 22 units / hectare) regularly found on strategic or action area sites under town plans / local area plans, it would be possible to provide more generously sized houses and also larger private open space.

The subject lands at Fassaroe however, it is submitted, present a very different overall planning context such that the standard private open space requirements, set out by Wicklow County Council under its various plans, is not appropriate or achievable on the Fassaroe lands. The density proposed for Fassaroe is 50 units / hectare. Such density is well in excess of the typical densities envisaged under the County Development Plan and various local plans within the county, even for town centre sites. On this basis alone, it is respectfully submitted that that standard private open space requirements envisaged for standard densities are not appropriate or indeed achievable within the context of the Fassaroe lands.

In addition the overall lands at Fassaroe provide for major public open space provision, well in excess of the standard rate of public open space provided for in smaller developments elsewhere in the county.

In terms of the specific planning context of the lands at Fassaroe we consider it relevant to consider typical garden sizes required by other planning authorities within the Greater Dublin Area which would contain similar new large scale new development centres at comparable densities.

Proposed Modifications No. 8(a) and 8(b)

On this basis CPG requests that Wicklow County Council give consideration to specific development standards, and in particular private open space, which would be appropriate and applicable to Fassaroe. CPG accordingly requests that the sixth paragraph of Page 1 Introduction of the Draft LAP be modified to state as follows (proposed additions in bold, deletions shown as strike through):

*"In particular, development standards, retail strategies, housing strategies etc. that are included in the County Development Plan shall not be repeated. Any **additional or alternative** specific policies/objectives or development standards required for this area, **or part thereof**, will be stated as precisely that, and ~~in all cases~~ will be consistent with the County Development Plan **as practicable. Any alternative provisions are specifically set out in the Action Area Concept Plan provisions at Chapter 11.** Thus development standards will therefore **generally** be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans and the general public alike"*

Hand in hand with this, CPG also requests that an additional 'objective' be included in the Concept Plan provisions for Fassaroe at Chapter 11 as follows:

	<p><i>"11. Private Open Space for Houses at Fassaroe shall not be subject to the standard requirements set out in the County Development Plan. However, private open space will be provided as follows:</i></p> <ul style="list-style-type: none"> • For 1 or 2 bedroom houses a minimum of 50 sqm. • 3 bedroom houses to have a minimum of 60 sqm. • 4 bedroom (or more) houses to have a minimum of 75 sqm.
<p>C72 CRH Estates Ltd</p>	<p>Roadstone Limited and CRH Estates Limited (both part of the CRH Group) have property assets within the Bray Municipal District at Fassaroe. The Roadstone/CRHE lands at Fassaroe are zoned under the Bray Environs Local Area Plan (LAP) 2009 – 2017 and are the subject of the Fassaroe Masterplan 2010. As key stakeholder, CRH Estates Limited (CRHE) intends to be fully involved in any review of LAP policies that would affect the development of Fassaroe.</p> <p>This submission sets out CRHE's proposed strategy for the Fassaroe area for inclusion by Wicklow County Council in the upcoming local area plan (LAP). This report outlines the preferred approach for the development of these lands. In proposing a revised development strategy for CRHE lands in Fassaroe, this submission outlines the following requested revisions to the Bray Municipal District Draft Local Area Plan 2017-2023 (draft LAP):</p> <ul style="list-style-type: none"> ▪ an updated concept plan; ▪ a revised zoning plan, providing for reduced open space, a supplementary schools site, a southern frontage to the village centre and additional residential zoned land; ▪ a more detailed proposal in relation to density; ▪ an urban structure plan; ▪ a more detailed phasing plan; ▪ greater information in relation to the provision of mass transit; ▪ more detailed proposals in relation to the delivery of schools. <p>1. Balance of Built Development and Open Space</p> <p>Map No. 2 of the draft LAP indicates that a large area of open space is to be provided within the CRHE/Roadstone landholding. The draft LAP states that open space is proposed on land restored by inert soil recovery and aggregate extraction areas. It is considered that the provision of open space should not be based on the former land uses at the CRHE/Roadstone lands, but on the need to provide a suitable, well-designed and functional open space that provides for the recreational needs for future residents. It should also be noted that the aggregate workings within the Roadstone/CRHE landholding have been the subject of restoration by inert soil recovery under an Environmental Protection Agency licence and do not pose an environmental or health risk.</p> <p>In order to provide for an appropriate active open space (AOS) within the CRHE/Roadstone landholding, a smaller local open space within the residential area and an appropriate balance of built development and open space, a revised zoning plan is proposed.</p> <p>2. Urban Structure, Density and Phasing</p> <p>The draft LAP does not provide detail regarding urban structure, density of residential development and phasing. In order to facilitate the preparation of an Action Area plan, CRHE has included preferred options in relation to these matters</p> <p>3. Provision of Luas and Ballyman Glen Bridge</p> <p>Notwithstanding that the Greater Dublin Area Transport Strategy 2016-2035 no longer provides for the extension of Luas to Fassaroe, the draft LAP requires that land is reserved</p>

for Luas stabling and that a bridge is required across the Ballyman Glen. It is noted, however, that the draft LAP does not specify the location of the bridge, the alignment of the Luas tracks or the location of the stabling.

In order for a comprehensive and integrated development strategy and urban structure to be designed for Fassaroe, it is necessary to specify the location of these key pieces of infrastructure. In order to address this matter, a concept movement plan is provided. It is also necessary to consider the provision of alternative forms of mass transit, in order to facilitate the development of the Fassaroe area should the development of the Luas not be forthcoming.

The Dun Laoghaire Rathdown County Development Plan 2016 – 2022 indicates that the delivery of the Ballyman Glen Bridge is the responsibility of the NTA, Dun Laoghaire Rathdown County Council and Wicklow County Council. This should be clarified in the final iteration of the Bray Municipal District Local Area Plan.

The National Transport Agency recently published the Greater Dublin Area Transport Strategy 2016-2035. This strategy does not refer to the provision of a Luas line through Fassaroe, unlike the previous strategy for the period 2011 - 2035. Based on the updated strategy, it is anticipated that the extended Luas line will pass through Shankill and the golf club lands to the east of the N11 and will likely terminate at Bray.

Notwithstanding the above, the County Development Plan and the Local Area Plan is predicated on the possible extension of the Luas to Fassaroe. Within the draft LAP, Sections 2.2.7 refers to the extension of the Luas to Fassaroe; Section 8.1 refers to the bringing of Luas or other mass transit to Fassaroe; policy PT3 refers to the provision of Luas or other mass transit to Fassaroe and the need for necessary stabling and infrastructure to be provided in respect of Luas or mass transit at Fassaroe; policy PT3 also refers to the creation of linkages from Enniskerry to the BRT/Luas terminus in Fassaroe; policy PT5 refers to facilitating the extension of Luas to Fassaroe; Chapter 10 refers to the changes to the proposed Luas extension to Bray and the need to retain the possibility of the Luas extension to Fassaroe; and item 4 of Chapter 10 requires the Action Area Plan for Fassaroe to provide for Luas or other mass transit infrastructure and any necessary depots or stabling.

In addition, policy RO4 requires the provision of a new road across the Ballyman Glen, which would potentially carry the Luas. The Dun Laoghaire Rathdown County Development Plan 2016 – 2022 also indicates the Luas alignment through Old Connaught to the boundary with Wicklow and includes a specific local objective to cooperate with the NTA and Wicklow County Council in the establishment of a road/Luas bridge to provided connections between Old Conna and Fassaroe. The M11/N11 Needs Assessment Report by the Transport Infrastructure Ireland refers to the development of a new local road west of the M11 between junction 4 and junction 6 which links Thornhill Road to Fassaroe as per the Fassaroe Masterplan.

Given the location of the site and the existing capacity of the N11, it is considered that public transport will be required to allow the completion of the development at Fassaroe. It is considered, however, that the delivery of Luas is unlikely, or at least uncertain, given that there is no strategic objective or funding to provide same. It is considered that the provision of public transport should be examined in further detail and that the possibility of a Bus Rapid Transit (BRT) hub should be given detailed consideration. The redesign of the open space, as proposed by CRHE, facilitates the delivery of additional residential development and helps to provide the critical mass to support mass transit.

In order to provide greater certainty in advance of the preparation of the Action Area Plan, it is considered that an indicative movement plan should be included in the draft LAP, showing the potential location of Luas stabling, a Luas stop, the alignment of the Luas tracks and the crossing point over the Ballyman Glen, as per Figure supplied.

Alternatively, this proposal for Luas alignment and stabling could provide for BRT depot and route. Given the uncertainty surrounding the delivery of mass transit and the need for housing, it is considered that the phasing of development should not be linked to the delivery of mass transit. It is considered that the delivery and funding of a major public transport infrastructure is beyond the scope of an Area Action Plan and that this matter should be addressed in more detail in the LAP.

It is considered that the draft LAP should clarify when the proposed bridge and road across the Ballyman Glen is required and whether the delivery of this road and bridge is linked to the phasing of built development.

4. Provision of Schools and Village Centre

The draft LAP notes that a multi school campus is to be provided within the village centre zoning. The number, types and size of schools are not specified. It is further stated that additional schools may be provided to the west of the open space within the residential zoning, if required.

In order to provide greater certainty to developers and to facilitate the preparation of an integrated Action Area Plan, it is considered that the location and likely number of schools should be specified. In order to facilitate this, a draft concept plan that identifies the location of schools and a zoning plan are provided in the submission.

It is also proposed that any additional school would be provided for within the Active Open Space. A primary school would benefit from access to the facilities within the Active Open Space and the proposed location would facilitate the delivery of vital infrastructure and facilities at an early stage.

The proposed village centre is located entirely within the Cosgrave Property Group landholding. This renders the delivery of housing to the south of Berryfield Lane dependent on the progression of the CPG development. It is considered that an area of village centre zoning should be provided to the south of Berryfield Lane, to facilitate the development of housing to the south of Berryfield Lane and to ensure that that village centre has a southern frontage. This will also ensure continuity with the Fassaroe Masterplan (2010) and the recently permitted Cosgrave Property Group proposal to the north of Berryfield Lane (ref. 16999) and would ensure the quality of the urban design outcomes.

5. Concept Plan

Chapter 10 of the draft LAP sets out a concept plan for the development of Action Area 1, which relates to Fassaroe. It is noted that this concept plan does not include a legend and does not relate directly to the zoning map (Map No. 2), because the area of open space shown on the zoning plan is larger than that shown on the concept plan.

This draft concept plan provides for residential development and open space on the CRHE landholding. It also provides for employment, village centre, residential and open space uses on the Cosgrave Property Group landholding. Although CRHE generally welcomes the draft concept plan, CRHE considers that greater clarity and additional detail within the draft LAP would provide greater certainty for both developers and communities and would provide a firmer basis for the development of an Area Action Plan.

A revised concept map is proposed by CRHE which provides for:

- the inclusion of a small area of village centre zoning to the south of the proposed link road;
- the identification of two locations for educational purposes;
- an increase in the residential zoning within the CRHE/Roadstone landholding;
- the redesign of the AOS Active Open Space zoning within the CRHE/Roadstone landholding;
- the redesign of the OS2 Open Space zoning to reflect the GB (greenbelt) zoning in the existing LAP;
- the provision of two local centres within the residential zoning.

6. Zoning

Although the draft LAP has reduced the area of employment land within the Fassaroe area, the land zoned for built development within the CRHE landholding has also been reduced. Under the existing LAP for the period 2009 – 2017, it is estimated that land zoned for built development within the CRHE/Roadstone landholding comprises c. 42ha and the area devoted to open space comprises c. 20ha. Under the draft LAP, the area of land zoned for built development is estimated to have been reduced has been reduced to c. 27.5ha and the area of open space, through the expansion of both the GB (greenbelt)/OS2 land and the OS (open space)/AOS (active open space) is now estimated as c. 35.1ha (refer to Table 3-1).

It is considered that a high quantum of development with adequate densities and adequate open spaces is required to support the delivery of Luas or another form of mass transit. An increase in open space provision would undermine the objective of delivering Luas or mass transit. The plan must allow for a quantum of development that supports efficient use of LUAS or other public transport investment.

A large area of active open space (AOS) now sits in the centre of the Roadstone/CRHE lands. This zoning covers a more extensive area, and extends further north, east and west than the existing LAP OS zoning. In relation to the open space, the text on Action Area 1 states:

"The need for a significant new open space facility to serve both the future residents of the area and the wider area; significant parts of the area were formerly used for aggregate extraction and for land filling and such areas are considered optimal for such use."

It should be noted that only part of the CRHE/Roadstone landholding has been the subject of aggregate extraction and subsequent restoration by inert soil recovery under an EPA waste licence. The restoration operations that have taken place within the Roadstone/CRHE landholding do not constrain built development, subject to appropriate engineering solutions. Restoration operations were undertaken using inert soil material; therefore, there are no environmental constraints related to the development of this land.

Roadstone is currently engaged in the process of surrendering part of the waste licence area. This process is overseen by the EPA (Environmental Protection Agency) and requires several years of monitoring data (much of which has already been gathered) to confirm whether Roadstone has complied with the requirements of the waste licence. It is considered that the lands within the waste licence area will be suitable for development and that there are no significant environmental constraints relate to the development of the land for housing or other built development.

The majority of open space provision within Action Area 1 is also required within the Roadstone/CRHE landholding. It is considered that the developable land within the CRHE/Roadstone landholding should be increased to ensure a more balanced provision of open space across the Action Area. As it stands, it is estimated that 40% of the zoned land

in the draft LAP is zoned as OS1, OS2 or AOS, with approximately 56% of the CRHE/Roadstone landholding zoned as AOS or OS2.

Furthermore, it is not clear whether the typical standard of 15% of local open space will be required within the areas zoned for high-density residential development. It should be noted that the relevant guidelines state:

"In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community."

It is considered that it would be extremely difficult to reach the stated housing targets for Fassaroe, if the requirement for 15% open space is applied in addition to the provision of land zoned AOS, OS1 and OS2 under the draft LAP. On this basis, it is assumed that the zoned open space provides for all of the required open space provision; however, this should be clearly stated in the draft LAP.

The active open space (AOS zoning), as proposed by the draft LAP, is extremely large and would benefit from being redesigned to create a more functional, multipurpose space that is wrapped by built development and benefits from a greater degree of passive supervision. In addition, the area zoned as greenbelt in the existing LAP is now zoned as OS2 and has been expanded. The draft LAP notes that the objective of OS2 zoning is protect existing undeveloped, open lands that include flood plains and areas of natural biodiversity. It should be noted, however, that the increased OS2 zoning includes some areas that are within the waste licence area and do not comprise a natural or undeveloped environment.

Under the existing LAP zoning, approximately 13% of the CRHE/Roadstone landholding is zoned GB Greenbelt and under the draft LAP zoning, approximately 27% of the CRHE/Roadstone landholding is zoned the equivalent OS2 Open Space.

A revised zoning map is proposed. This provides for a more functional and usable area of active open space; ensures that a southern frontage is provided to the neighbourhood centre; provides an appropriate balance of built development and open space; provides local open space; and permits the early delivery of a school site within the CRHE/Roadstone landholding, if required.

7. Density

Under policy R2, Wicklow County Council requires a density of not less than 50 units on lands zoned R-HD. In order:

- to meet Wicklow County Council's requirement for an overall density of 50 units per hectare;
- to provide greater flexibility regarding the distribution of densities across the site;
- to provide greater flexibility in relation to the type and design of dwelling units and to provide for a variety of household types;
- to provide for appropriate densities adjoining the OS2 zoned land;
- to support the provision of Luas or another form of mass transit;

CRHE proposes the clustering of higher densities around the neighbourhood centre; the provision of 50 units per hectare across the majority of the Action Area; and the provision of some lower density areas in the proximity of the OS2 zoning

	<p>8. Urban Structure</p> <p>CRHE notes that the proposed zoning plan and concept plan under the Draft LAP does not provide any indication of urban structure. In order to provide a firmer foundation for the development of an Action Area Plan and given the scale and importance of the Fassaroe development site, CRHE considers that an urban structure plan should be included in the draft LAP as per Figure 4. The urban structure provides for a new link road along Berryfield Lane, a bridge across the Ballyman Glen and the urban structure as currently proposed within the Cosgrave Property Group landholding (ref. 16999).</p> <p>9. Phasing</p> <p>It is also considered that a more detailed approach to phasing should be included in the Local Area Plan. Again, this would provide greater certainty and would facilitate the development of an Action Area Plan. The outline phasing plan is proposed which relates to the development of the CRHE lands on the basis that the timescale for the development of other lands within the Action Area is not currently known.</p> <p>Phase 1A provides for the development of the neighbourhood centre to the south of Berryfield Lane, residential development, the identification of a school site, the provision of part of the active open space, the development of the avenue and the development of the school site, if required.</p> <p>Phase 1B provides for the development of further residential development and the delivery of part of the active open space.</p> <p>Phase 2 provides for the development of a local centre, further residential development, active open space, the completion of the avenue and the provision of local open space. The area of OS2 land within the CRHE landholding would also be completed in Phase 2</p> <p>All phases provide a reservation for the delivery of Luas.</p> <p>This phasing plan ensures the delivery of critical local services, active open space and a school in phase 1A to ensure that residential development benefits from the necessary facilities and social infrastructure, if required, from the outset. This phasing plan also ensures that suitable village centre facilities can be provided notwithstanding any delays in the delivery of a village centre to the north of Berryfield Lane.</p>
<p>C256 RGRE J & R Valery's Ltd</p>	<p>This submission relates to lands within the curtilage of St. Valery's Fassaroe, Kilcrone, Bray, Co. Wicklow and bounded by the N11 to the east and the Enniskerry Road (R117) to the south. The zoning re-designation of the subject lands from 'hotel use' in the Bray Environs Local Area Plan 2009-2017 to 'tourism' as proposed within the Draft Bray Municipal District Local Area Plan 2017 is supported. However, it is respectfully submitted that the extent of the hotel zoning as indicated in the County Plan be retained within proposed new tourism zoning in the Bray Municipal District Local Area Plan.</p> <p>The subject lands are located in the settlement boundary of Bray, as defined in the Draft LAP. The subject site is located off the N11 National Primary Route which connects Dublin southwards to Wexford. The site is bounded to the west and north by the Dargle River and the St. Valery's demesne beyond. The south eastern portion of the site is bounded by Council owned land containing the access steps and a pedestrian footbridge crossing the N11. The bridge provides pedestrian connectivity from the subject lands to lands west of Bray Town. North of this along the eastern boundary there is an existing berm rising some 7 metres above the remainder of the site which falls gently from the Enniskerry Road northward towards the River Dargle. The existing berm on the eastern boundary contains a</p>

	<p>number of mature trees. The remainder of the eastern boundary is formed by a 2m high blockwork wall running parallel to the N11 dual carriageway which is at a level approximately 2 metres higher than the site.</p> <p>This submission seeks amendments to the Draft Bray Municipal District LAP in relation to the zoning boundary of our client's lands for tourism use:</p> <ul style="list-style-type: none"> ▪ The Bray Environs Local Area Plan 2009-2017 designates the subject site as Hotel use. The Draft Bray Municipal District LAP re-designates the zoning of the subject site to Tourism. As part of the re-designation, the boundary of the tourism land use area has been marginally decreased and covers a lesser extent. ▪ It is clear from the zoning map that the extent of the proposed tourism zoning has been reduced marginally in comparison to the previous hotel zoning. The reduction in the boundary of the proposed zoning reduces the development potential on the lands and potentially hinders future tourism development due to the tight site constraints. The retention of the previous zoning extent will enable a more appropriate sized development on the site while at the same time respecting the River Dargle and the N11 buffer zone. ▪ As such, it is respectfully requested that the extent of the land use boundary of the hotel zoning as indicated in the Bray Environs Local Area Plan 2009-2017 be retained within the proposed Tourism zoning in the Bray Municipal District Local Area Plan 2017. ▪ In addition, it is respectfully submitted that rental residential accommodation for tourism and general occupancy should be included within the Tourism zoning description as indicated in Chapter 11, page 73 of Draft LAP having regard to the location of the site within the settlement boundary of Bray.
<p>C261 M. Rogers</p>	<ul style="list-style-type: none"> ▪ Housing should be concentrated on the site at Fassaroe, west of the N11 ▪ The Luas must go to Bray town centre, not to the new-to-be-developed site at Fassaroe. The decision must not be made on the influence of any developer to part-fund a Luas station.

Opinion of Chief Executive

General

1. The objectives for the development of Fassaroe require *'All new development shall be accompanied by appropriate transport services, the format and scale of which shall be in accordance with the Bray and Environs Local Transport Plan (to be carried out by the NTA in collaboration with Wicklow County Council and Transport Infrastructure Ireland). Developers shall be responsible for the provision and funding of the required transport services until such a time as public services are extended to the area'*
2. The scale of retail intended for Fassaroe is to meet the day to day needs of the resident population of the area, as set out in the County Retail Strategy and this LAP, and shall be in the order of 2,500sqm convenience and 1,000sqm comparison. Fassaroe is intended to form an 'extension' to Bray rather than a new stand alone town, and all of the provisions of the plan, be they retail policies, transport connections etc are intended to support that structure.
3. The priority for new development in Bray is the town centre and the redevelopment of brown field or underutilised sites. However, even if all such sites were redeveloped and at high densities, there would still be a significant shortfall in housing delivery in the area. The development of Fassaroe is a major component in meeting the housing demands of the area and it is the objective of the plan that both the town centre sites and this new expansion area should occur in the immediate term.
4. The decision on the route of LUAS, if it is extended, would be taken by the Government / NTA. The CE supports the extension of LUAS to both Bray centre and Fassaroe, but acknowledges that the greatest number would be served and the best 'link up' provided were LUAS extended to Bray centre and particularly to Bray station.
5. The plan is intended to support and facilitate the rapid delivery of the maximum number of quality

housing units in Fassaroe or a range of types, sizes and densities.

Submission from Cosgrave Property Group

1. Some zoning definitions / codes were inadvertently omitted from the draft plan and when this was discovered, a correction was placed on the website. In order to ensure that these corrections are built into the final plan, it is recommended that these corrections be the subject of a formal 'amendment'.
2. It is confirmed, in accordance with the County Development Plan, the 'centre' in Fassaroe is to be designated a 'neighbourhood centre'. However, the entire 6ha block shown zoned for such use is not intended for retail / commercial use – the concept is for a new 'hub' including c. 1ha retail / commercial / community zone, with residential uses overhead plus a 5ha schools campus, side by side. It is considered that such a form of development will bring an active new heart to the area and would also potentially allow for shared services such as car parking and multipurpose trips. In this regard, it is therefore recommended in the interest of clarity, to amend the zoning such that 'neighbourhood centre' designation is applied only to 1ha and 'Community, Education' zoning is applied to the remaining 5ha. It is not accepted that the decision regarding the future location of schools lies with the Department of Education and Skills – new schools can only be built where the zoning objectives of any plan allows for educational use and indeed, only on sites where the Council permit such development. As it is the responsibility of the planning authority to make land use decisions, it is considered appropriate that the desired location for the school campus is set out in this plan, at a location that the Planning Authority determines is the most suitable.

It is noted that part of the intended new 'CE' zone was granted permission for residential use under 16/999. This application is under appeal. In the event that such permission is confirmed by the Bord, or even indeed if it is not, a review of the location of various uses can be undertaken through the 'Action Area' agreement process – the plan clearly states that uses set out in the plan are indicative only and may change if circumstances necessitate. What is in the plan here is purely conceptual, albeit based on a rational framework.

3. It is recommended that the phasing plan be amended to be more focussed on the delivery of certain 'elements' rather than their geographical location. In this regard, a revised zoning plan generally as follows is recommended:

Phase 1	<ul style="list-style-type: none"> ○ Road link from N11 to Ballyman Road ○ Passive park (8ha) ○ Site identified and reserve for school campus ○ Neighbourhood Centre ○ 1,500 residential units
Phase 2	<ul style="list-style-type: none"> ○ 50% of the active open space (c. 6ha) ○ 1,500 residential units
Phase 3	<ul style="list-style-type: none"> ○ Remainder of active open space (c. 6ha) ○ Identification and reservation of site for additional primary school ○ Remainder of residential units

4. (a) As noted by the submitter, the boundaries of the various zones are not prescriptive and uses / boundaries can be amended if necessary through the 'Action Area' process. It is considered essential however that the Planning Authority sets out desired land uses in the plan at the outset to give clarity and some certainty to landowners and third parties. The OS zone to the north of Berryfield Lane was set out in consideration of the boundaries of the former landfill sites in the area plus a buffer around same.

It is accepted that the extent of the OS1 and AOS zones in the central part of the area is in excess of 20ha (the desired extent of the new major park). In this regard, it is recommended that the OS zones be amended to 9ha north of Berryfield Lane and 13ha south and the park area be described as 22ha.

(b) It has not been practice in any development plans made by Wicklow County Council to indicate hotel use as being 'permitted in principle' or 'typically appropriate' in employment zones. Obviously if the employment type was typically 'industrial', a hotel would probably not be suitable; an office park on the other hand might be assessed differently. However, it is not indicated as 'not permissible' and should any such project come forward, it can be assessed on its merits. No change is therefore recommended. (It should also be noted that lands have been specifically zoned for tourism use in Fassaroe at the River Dargle, but not in the ownership of CPG).

(c) The point raised with regard to garden size is accepted and it is considered that the changes suggested should be made, reflecting the higher density targeted for the area.

Submission from Roadstone

1. Land is not zoned OS on the CRH holding on the basis only that it is a former aggregate extraction area. The OS zoning provisions are on the basis of analysis carried out as part of this plan that showed there was a deficit of AOS land in the urban area of Bray and this is the only area in the vicinity of the major population of Bray where such a large land bank would be available for this. It is noted in the draft plan that areas of Fassaroe that were formerly landfill or extractive areas are considered optimal for such use, but it is also clearly stated that *'The position, location and size of the land use zonings shown on plan maps are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Areas'*.

The final location and layout of the OS area will indeed be based on providing a well-designed and functional open space that provides for the recreational needs for future residents as suggested in the submission.

2. The plan does provide for phasing and density provisions. With regard to 'urban structure' this is considered a more detailed matter and best achieved at the Action Area and planning application stage.
3. The zoning of Fassaroe is not predicated on the extension of LUAS to this area and it is acknowledged at this time that public transport is as likely to be bus based. Significant work is being undertaken in this area by the Council in conjunction with DLR and NTA / TII. Notwithstanding current status of LUAS, it is considered prudent to continue to make provision for same in Fassaroe in the event the Government investment priorities change (Note: the plan states *'the development of this area shall make provision for LUAS or other mass transit public transport services, and any necessary infrastructure such as depots / stabling'*).

Even in the event that LUAS is not brought to this area, the bridge over the Ballyman Glen is considered an important element of the roads / transport network needed to serve this area particularly by bus based public transport as it would provide an additional link to Bray via Old Conna Avenue. It is considered that at the 'Action Area' plan stage, in consultation with the various transport agencies, a final determination can be made of the needs with respect to either LUAS or bus based transport (e.g. for routes, depots etc).

The location of the bridge over Ballyman Glen cannot be specified as it has not been designed nor could a route be selected without going through the equivalent of a full Environmental Impact Assessment process. With respect to 'responsibility' for the delivery of this bridge, the responsible parties would be Wicklow County Council, Dun Laoghaire Rathdown County Council, NTA, and private developers.

4. Additional information is recommended to be provided in the plan regarding school provision in the plan area, including Fassaroe (please see recommended amendment No. 4). It is recommended that

the zoning be amended in Fassaroe at the proposed neighbourhood centre to make it clear that only 1ha is designated for retail / commercial use and the remaining 5ha is for a multi school campus. It is considered that in the event of a need arising for another primary school, this should be located in residential zoned land to the west of the major open space rather than in the proposed major open space.

The identified 'neighbourhood centre' zone is considered the optimal location for the centre, given the road layout likely for the area, including a major east-west link to Enniskerry north of Berryfield Lane and the north – south link across Ballyman Glen. In order to ensure that such a centre serves only the local shopping and commercial needs of the resident population, its size is required to be modest (c. 1ha) which could accommodate, in a 3-4 storey complex, the required c. 4,000sqm of retail / commercial / community space, c. 75 residential units and significant open areas / surface car parks. There simply would not be a demand for an extension of this centre in the CRH lands.

5. The concept plan is simply that and is intended to be a very simplified drawing of the key concepts that give rise to the zoning plan. An additional detail is therefore not required but it is accepted that if the zoning plan were to be amended, the concept plan should be updated.
6. It is noted that the amount of land zoned for 'development' in the CRH landholding is reduced in this draft plan compared to the previous plan. In particular of the c. 74ha landholding, the previous plan provided for 'development zones (MU1, MU2, R1, R2, E) of the CRH holding of c. 40ha; this draft plan amends this to c. 30ha (R-HD). In light of the recommended revision to the major OS zone, and the shortfall of zoned housing land in the plan overall, it is recommended that an additional area of c. 7.5ha (375 units) be zoned R-HD in the CRH lands, east of the major OS.

With respect to the issue raised with respect to 'balanced' zoning provisions, under the previous development plan, the Cosgrave lands comprised c. 48ha of 'development' land (MU1, MU2, R1, R2, E) whereas this draft plan provides for c. 46ha, which includes a 5ha education zone. This should be also considered in the context where the majority of the strategic road infrastructure (east-west road to Enniskerry, north-south road over Ballyman Glen) is located on the Cosgrave holding. No strategic road infrastructure may be necessary on the CRH holding (depending on final public transport requirements) but in lieu of same, a major public open space is required. It is considered on balance, that the public good burden is substantially lower on the CRH landholding overall.

7. The density of 50/ha targeted is a total overall density desired and it assumed there may be areas of higher or lower density on the site.
8. 'Urban structure' is considered to be a finer detail, most appropriately carried out at to the 'Action Area' or planning application stage. This is not a masterplan or a SDZ – it is a land use zoning framework.
9. The phasing plan is dealt with above – no changes are recommended on foot of the suggested from CRH.

Submission from RGRE

1. The extent of the hotel / tourism zone at this location has been curtailed on the basis of the flood risk extent on these lands – any lands that are deemed to be at risk of flooding have been excluded. It should be noted that the flood risk study carried out by the developer in a recent planning application was an important source of information in this regard and in light of the developers' own findings regarding the level of flood risk, no development was in fact proposed in the area deemed to be at risk of flooding. These are the same areas that have now been excluded from the zoning.
The lands that are considered to be at risk of flooding are zoned OS2; as set out in the plan -
*Uses appropriate for **open space (OS2)** zoned land are uses that protect and enhance the function of*

these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. As these open lands are not identified or deemed necessary for development for recreational purposes, other uses that are deemed compatible with proper planning and sustainable development may be open for consideration where they do not undermine the purpose of this zoning.

This designation would not for example preclude open space, or infrastructure associated with the hotel such that such uses not undermining the purpose of the zoning, which in this case, is to ensure no one occupying the hotel is put at risk from flooding or the development of this land would not give rise to increased flood risk elsewhere.



Source: Planning Reregister Reference 16/1271

2. It is not agreed that 'rental residential accommodation for tourism' or 'general occupancy', assuming this means long term rental i.e. essentially people living in the hotel, is an appropriate use for a tourism zone. These lands are not suitable for long term residency due to (a) car dependency, (b) distance from amenities such as shops / schools etc and (c) lack of normal private amenities associated with longer term use e.g. private open space.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No. 4 , as detailed in Part II of this report (p19)
2. Amendment No.11 , as detailed in Part II of this report (p30)
3. Amendment No.18 , as detailed in Part II of this report (p42)

SECTION 3.17 (b) AO SMITH

This section of the report deals with the submissions that have been made with respect to the AO Smith site.

Name	Issues raised
Deputy John Brady	A section of land beside the Killarney Rd Business Park should be rezoned to allow for some residential development. This would be specifically affordable accommodation for local people. The majority of the site should remain however for employment uses. This would include the area that is covered by a live planning application.
Cllr Steven Matthews	Rezone the AO Smith site as new residential at a suitable density
C66 T. Cookson	Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.
C92 DM Properties	<p>DM properties are the owners of the AO Smith site. The submitter is seeking that the previous employment zoning, which allowed for retail use, be reinstated for the followings reasons:</p> <ul style="list-style-type: none"> ▪ Such a use would provide a genuine prospect of kick starting development on the overall site, and thus job creation; it would allow for up front delivery of infrastructure, creation of serviced sites and garnering of interest from other sections of the market; ▪ Without such use, the development of the site for employment use only would unlikely to be viable. <p>It is also requested that 'retail warehousing' be included as a permissible use on this site; it is set out that such use is 'open for consideration' in the previous plan, but not specifically listed as appropriate in the draft plan.</p> <p>(Note: this submission includes significant detail about the development history of the site and the efforts that landowners have made to bring about viable development on the site).</p>
C93 M. Doherty	There are three sites close by, on the Boghall Road which are vacant and could be rezoned for residential use. This would use space that is 1. Idle and 2. Have residents nearer the town and shops and more frequent public transport. The 3 sites are 1. Dell, 2. Schering Plough, 3. A O Smith
C118 Ffrench	AO Smith site should be considered for high density residential and enterprise use.
C175 Lidl Ireland	<p>The submitter is seeking that the previous employment zoning, which allowed for retail use, and the 'opportunity site' status, be reinstated for the followings reasons:</p> <ul style="list-style-type: none"> ▪ in order to positively contribute to the realisation of identified development objectives within the Wicklow County Development Plan and specifically for Bray; ▪ the option of a supermarket at this site is critical to realising its development potential; this would facilitate the timely delivery of development of this brownfield site and a more immediate sustainable use, providing employment (direct and indirect) and will significantly increase the marketability of the site and the potential to reinvigorate the

	<p>entire site;</p> <ul style="list-style-type: none"> ▪ considering this context and the expansive growing residential catchment, from a planning perspective there would appear strong reasoning supporting the principle of providing an objective for retail development at the site; ▪ the previous Bray Local Area Plan 2011-2017 identified the subject site as an opportunity site for Employment Uses, with the potential for a range of development; other than Lidl, the site has had no further interest in developing the site to its potential. The site remains a brownfield site. Given that the previous LAP promoted the development of taller buildings and a range of permissible development types on the subject site, it is unclear as to why the site was omitted from the list of identified opportunity sites by the Council. ▪ Lidl Ireland GmbH has given a clear expression of interest in developing a supermarket specifically on this site in line with the current planning objectives for the site. In addition to the site's adjacency to the zoned neighbourhood centre, the site's location and scale has clear operational advantages in being able to absorb a mix of development uses while not impacting on the function of the historic centre of the town or neighbouring centres. By allowing for a mix of uses on the site there are clear advantages for the development of the site as a whole; ▪ it is clear from the evidence development of the site to date has failed. With the exception of the 'supermarket option', there has been no interest shown in realising its development potential. It is highlighted that there are extensive employment-generating lands located within the neighbouring vicinity (e.g. Boghall Road, Killarney Business Park), along the Southern Cross route and as such the employment generating potential of the area will not be materially affected by the inclusion of an option for a supermarket at the subject site; ▪ there is a clear need for additional convenience retail floor space and other alternative uses required in this area of Bray to serve both the existing and projected local population and future employment population. The site is over 1.6km from the town centre and therefore not within easy walking distance for many locals within the defined catchment. A retail development would address the significant expenditure leakage currently occurring as evidenced in the Retail Impact Assessment which accompanies the current application for permission; ▪ The site retains the key locational characteristics which made it worthy of an 'Opportunity Site' designation in 2011. The zoning provisions of the new plan needs to reinforce the potential of the site to become a landmark mixed-use development serving both employment and local needs.
--	---

<p>C261 M. Rogers</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>
---	--

Opinion of Chief Executive

In the 2011 Town Development Plan, the AO Smith was zoned 'EMP1' and was identified as 'Opportunity Site No. 7) , where the objective was:

'Predominantly employment use development. Industry/office/ and science and technology based uses in the

main with the option of neighbourhood services / discount foodstore. The site is considered suitable for the location of taller buildings up to 5 storeys in height. Max Plot Ratio 1.5'.

The plan also stated: *It is the policy of the Council to permit in principal discount foodstore developments on lands zoned NS, NS1 (Neighbourhood Centre Uses) and the AO Smith 'Opportunity Site'.*

The draft plan proposes an 'E – Employment' zoning for the site: Uses generally appropriate for **employment** zoned land include general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations and ancillary developments for employment and industry uses in accordance with the CDP. The draft LAP does not specifically allow for a discount retailer in this zone / on this site.

In this regard, it was considered that there would be an adequate geographical 'spread' and range of retailing available without additional retail on this site, having regard to the proximity of the existing Aldi store on Boghall Road and the proposed new 'neighbourhood centre' on Southern Cross.

However, in the assessment of a recent planning application for a discount retailer on this site, it was deemed by the Planning Authority that sufficient justification had been made for a discount retail store at this location. It is therefore recommended that this provision of the previous plan be reinstated.

It is recommended that the objective for the remainder of the site should stay 'employment' use and not be changed to 'residential' use for the following reasons:

- Subject to consent being secured for retailing on the eastern part of the site as currently proposed, the remainder of the site would be surrounded on 2 sides by commerce / light industry and the other 2 sides by busy roads; this is not considered ideal for residential use (particularly in terms of noise and privacy)
- The landowner has not suggested or requested such a use and appears committed through the development of an indicative masterplan, to significant employment development on the site;
- While it is accepted that there is a shortfall of residential land in the settlement overall, it is considered an unsustainable solution to simply rezone all employment sites for residential use, as the plan must also facilitate employment, close to where people live; in this regard, the draft plan has provided for the change of use of only one existing employment site to part residential use (Dell site) having regard to particularly the large size of the site which would facilitate high intensity employment and residential use; given the size and configuration of the AO Smith site (taking the eastern portion to be used for retailing) it is not evident how a mixed use development along the same lines (i.e. high intensity employment and residential) could be provided without severely limiting the quality of residential amenity to future residents.

With regard to the suggestion that any residential development should be used for affordable housing for local people only, this suggestion would not be in accordance with the law.

With respect to 'retail warehousing', the previous plan described such use as 'not normally permitted but open for consideration'; this is not the same being permissible in principle which is being requested. It is considered that allowing an element of retail in the form of supermarket / discount retailer (on c. 30% of the site) would be sufficient to 'kick start' the site without undermining the overall employment objective. It should be borne in mind that retail warehousing generally provides (a) a low density of employment and (b) high intensity car based traffic (given that bulky goods are involved) which is not considered compatible with the overarching objective to provide a high level of high quality employment and with this location, which is under pressure from traffic congestion. Therefore no change is recommended in this regard.

With respect to the request that the site be designated an 'opportunity site' this is considered reasonable and would allow for additional objectives to be applied to the overall development of the lands.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.16 , as detailed in Part II of this report (p39)
2. Amendment No.18 , as detailed in Part II of this report (p42)
3. Amendment No.19 , as detailed in Part II of this report (p48)

SECTION 3.17 (c) REHILLS

This section of the report deals with the submissions that have been made with respect to the site at Rehills

No.	Issues raised
C66 T. Cookson	The submitter is opposed to housing on Rehills land - this is the bank of our lovely river Dargle and should be made into a recreational area or planted with more trees. We have such few recreational areas in Bray. There is plenty of other land for housing.
C118 A. ffrench	The submitter suggests rescinding proposed re-zoning of MU riparian lands - current Open Space (OS4) in Bray Town Plan 2011-17 – as too costly in engineering and development terms (requires intrusive in a flood-prone river valley, refs OPW CFRAM maps) and negative environmental impacts (biodiversity loss, trees loss, erosion, etc.) Expanding OS designations to fully cover the entire river basin, providing basis for a large riparian, naturalistic Public Park, as a key link in the Blue-Greenway chain from Bray Harbour/Cliffs to Enniskerry and beyond.
C261 M. Rogers	The submitter is opposed to housing on Rehills land - this is the bank of our lovely river Dargle and should be made into a recreational area or planted with more trees. We have such few recreational areas in Bray. There is plenty of other land for housing.
Opinion of Chief Executive	
<p>Concerns regarding the zoning of Rehills for residential development have been evaluated. These lands have been zoned for residential and commercial / tourism development for a number of Local Area Plans and are well above the flood levels of the Dargle, therefore it is considered that these lands are now prime for development.</p> <p>As noted in the Draft Plan, lands closest to the River Dargle are designated as 'open space' and comprise part of the River Dargle flood conveyance area. It is intended that this area would form riparian, naturalistic public park linked to other parks and open spaces - it is the objective of the Draft Plan that <i>'all open spaces either in the 'OS' or 'R-HD' zones shall be linked and shall connect in as many locations possible to existing public areas (existing parks, open spaces, public roads etc) and in particular to the future riverine amenity route along the south bank of the Dargle to Bray town centre, which is an objective of this plan, as well as to the Herbert Road if possible.'</i></p>	
Chief Executive's Recommendation	
No change	

SECTION 3.17 (d) SLO-4: DELL

This section of the report deals with the submissions that have been made with respect to the former Dell site.

Sub No.	Issues raised
<p>C66 T. Cookson</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>
<p>C93 M. Doherty</p>	<p>There are three sites on the Boghall Road which are vacant and could be rezoned for residential use. This would use space that is (a) Idle and (b) Have residents nearer the town and shops and more frequent public transport. The 3 sites are 1. Dell, 2. Schering Plough, 3. A O Smith</p>
<p>C118 A. Ffrench</p>	<ul style="list-style-type: none"> ▪ Restrain, prevent urban sprawl and regenerate: rejuvenation the many industrial and derelict, abandoned sites/areas (Boghall Road, Killarney Rd). ▪ Revise draft Objectives and Zonings to re-balance towards more high-density residential and enterprise on mixed and single-use sites, e.g. Dell, A.O Smith, Industrial Yarns, Little Bray - and have been in decline over the past 5 years. We have a number of sites such as the Dell Site, the AO Smith site, the APC site and others that are in need of redevelopment and regeneration. These brownfield and derelict sites should be prioritised and redeveloped before we look at zoning or developing any greenfield sites.
<p>C241 Park Devts Group</p>	<p>This submission is from the owners of the former Dell site.</p> <ul style="list-style-type: none"> ▪ The SLO / MU zoning is welcomed ▪ However amendments are requested to ensure an appropriate range of residential, employment (including those with community and social benefits) and ancillary uses are provided for in any future redevelopment of the subject lands ▪ It is submitted that due to SLO 4 permitting residential and modern format office use only, that this could have implications in respect to the viability of delivering the much needed regeneration of the Former Dell Site. In this regard, this submission requests that due consideration be given to also including a nursing home, health centre, and ancillary uses such as café or shop, as additional employment generating uses, which also offer community and social benefits, appropriate under the Specific Local Objective 4 relating to the subject site. <p>The rationale for the requested amendments :</p> <ul style="list-style-type: none"> ▪ It is respectfully submitted that SLO 4, which restricts the employment use to 'modern office format' or c. 20,000sqm, is overly prescriptive and will be difficult to deliver in this location. Thus, the limitation on the type of employment use may have implications in bringing forward the much needed regeneration of the site, including employment generating uses. ▪ The submitter has concerns about the viability of delivering 20,000sqm of modern office format floorspace on the subject site. It is considered that greater flexibility under SLO 4 is required, for example broadening its scope so as other employment uses such as a nursing home or health centre are provided for in addition to modern format office use. The submitter considers that a more realistic target for the site could be 10,000sqm of

office floorspace and c. 10,000sqm of nursing home and health centre floorspace.

- It is requested that 'Nursing Home' and 'Health Centre' be included as potential employment generating uses under the SLO 4 objective relating to the former Dell Site. It is respectfully submitted that a Nursing Home is a particularly appropriate use for the subject site as it would provide significant employment, community and social benefits for the area. There is also a recognised need for modern nursing home accommodation in Bray.
- The submitter has been approached by a nursing home operator who is interested in developing a facility on the subject site. The submitter recently secured planning permission for a 224 no. bed Nursing Home facility, at Leopardstown Valley Neighbourhood Centre. The nursing home has a GFA of c. 12,600sqm of floorspace including basement car park. The permitted nursing home facility at Leopardstown Valley is expected to create 180-195 direct full and part time jobs, based on information provided by the proposed operator of that facility. Such a facility will also generate significant indirect employment for healthcare consultants and services. It is considered that the Former Dell Site is suitable to accommodate a similar scale of facility.
- Thus, it is respectfully submitted that a nursing home development on the subject site could create in the order of 175 direct jobs and indirect jobs. In addition it is considered that a health centre would be a complementary use to a nursing home and as both are employment generating uses, the Planning Authority should consider amending the SLO 4 objective to provide the opportunity for such development on the former Dell Site. Such uses are likely to be more viable in this location in the short to medium term and provide greater flexibility for the developer.
- Nursing home use is considered to be appropriate for the subject site as there is a recognised shortage of good quality elderly care facilities nationally and in the Bray area. The inclusion of nursing home as a potential employment use on the subject site would support the Government's five year plan for investment in the replacement of existing public nursing homes, as issued in 2016. In addition, there is a recognised need to support this Government investment with the delivery of good quality nursing home facilities in appropriate locations by the private sector. The proposed development would also help meet the need for elderly care in this area of Bray. This would also in turn potentially free up larger family homes in established residential areas of Bray for sale to younger members of the community.
- It is also considered that small scale ancillary uses such as restaurant/café and shop, should be permitted under SLO 4, as they would complement the residential, office, nursing home and health centre uses, which are requested. They would also help provide for streetscape activity in key locations and would comply with the employment generation requirement of the Mixed Use zoning and more specifically SLO 4.
- The developer is committed to providing a modern office and residential development on the subject lands, however, it is submitted that greater flexibility in respect to how the c. 20,000sqm of employment use could be delivered on the site is required, for example by facilitating a nursing home and health centre use of c. 10,000sqm.

The following text changes are suggested:

"Given that this site is surrounded by both residential and employment uses, it is considered that a mixed, high intensity employment and residential scheme would be suitable on these lands, in accordance with the following criteria:

- *The development shall be delivered a high density format and in particular, shall have a plot ratio of not less than 1:1. Development of up to 4 storeys may be considered;*
- *The employments element shall be in modern office format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1*

- plot ratio, a total employment floor space yield of at least 20,000sqm is desired;
- *A nursing home and / or health care facility will also be considered to meet a portion of the employment floorspace requirement on site;*
 - *In addition small scale ancillary uses such as restaurant/café or shop may be required to serve and complement the employment and residential uses;*
 - *Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sq.m)*
 - *Any planning application shall include a detailed phasing programme that ensure the timely delivery of all elements of the SLO. In order to 'kick start' the development, a first phase of housing, comprising not more than 50% of the total housing programme, may be developed as a 'Phase 1' of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the employment element". (Requested amendments in bold and underlined)*

Opinion of Chief Executive

General (C66, C93, C118)

As part of the plan crafting process, all derelict, abandoned or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development. Every opportunity to meet the housing growth target from such sites was taken, and in the majority of cases, a high density objective applied e.g. Dell. The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the Dell site and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development, application of vacant sites levy etc.

Zoning

Detailed consideration was given to the options for the Dell site. Notwithstanding the desire to maintain as many employment sites in the town, it was deemed that this site, given its size and surrounding land uses, would be suitable for an alternative zoning, which include some residential development³⁰ in order to kick start the redevelopment of the site which has lain empty for many years. The overriding priority however is to ensure that significant employment will still be delivered on the site, in a high density format to compensate for the loss of the employment land to residential, and as a quid pro quo in return for the benefit to the developer of receiving a residential zoning – such residential use can allow for the securing and generating of funds early on in the development in order to fund the employment element.

Employment Uses

The vision is for a high intensity apartment and office block development on the site on the basis that such a form of employment has the highest employment density yield. It is requested by the landowner that a portion of the 20,000sqm of employment space should be allowed to be met by nursing home / health uses.

While it would appear (in accordance with the figures supplied by the landowner), a nursing home development would appear to be less intensive in terms of employment creation than offices, the suggestion is considered reasonable strictly only on the basis on such use not accounting for more than 50% of the desired employment floorspace.

³⁰ In the previous plans, the lands were zoned EMP1 (Bray Town Development Plan) and E3 (Rathdown No. 2 Plan). These zoning only allowed for:

EMP1: Employment use development. Industry/office/ and science and technology based uses.

E3: To protect, provide and improve appropriate employment uses including industrial, warehousing and wholesale warehousing, business, office and science / technology use.

Other uses

Ancillary uses such as small cafes / shops to service the employees of an employment development would be open for consideration in employment zones, subject to local circumstances, for example if the location was distant from existing facilities and / or would not undermine facilities in an adjacent centre. This site is located only c. 300m (4 minute walk) from both the Vevay neighbourhood centre and the supermarket (Aldi) on Boghall Road. In these circumstances, it is not considered appropriate at this stage, without knowing the likely format, density and use of the site, whether shops / cafes would be needed on the site. Therefore it is not recommended that such uses be specified in the plan as being permissible but rather to allow the suitability of such uses to be determined at the planning application stage.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.14 , as detailed in Part II of this report (p37)

SECTION 3.17 (e) SLO-5 BRAY GATEWAY & TRANSPORTATION HUB (GTH ZONE)

This section of the report deals with the submissions that have been made with respect to the Bray Gateway and Transportation Hub.

No.	Issues raised
C21 Bray Retailers Group	<p>Bray needs to leverage its high quality public transport connections. The Bray Retailers Group proposes the development of a new transportation hub at the Carlisle grounds and siding area that will accommodate one main intercity railway line linking Bray to Rosslare Europort, two DART lines, one LUAS line, a bus terminus and coach bays for public and private operators. It should include sufficient multi-story parking for cars and bicycles to facilitate park-and-ride.</p> <p>The redevelopment of the existing lands encompassing the Carlisle grounds, Bray train station and the adjacent warehousing/commercial sites should be a mixed-use with significant residential and some commercial elements and could involve the consolidation of the aforementioned land parcels. These developments should be built over the transport tracks, bays and roads. The aim should be to get up to 900 units into this footprint.</p> <p>The transportation hub should also be well connected with the Main Street and with the northside of the Dargle River. A new road and bridge should link the hub with the developments on the old golf course and continue as an arterial route to a new roundabout at the crossing of Quinsborough Road and Adelaide Road.</p>
C67 John Corcoran	<p>It is suggested an additional paragraph be inserted in SLO5 as follows: <i>"Wicklow County council will preserve the Carlisle Grounds for active sporting purposes, Should Bray Wanderers decide to terminate its lease here, Wicklow County Council will seek to offer the Carlisle Grounds to another sporting organisation or organisations so as to retain the Carlisle Grounds in active sporting use"</i></p>
C82 Dempsey	<p>A. One area in particular in need of redevelopment, as highlighted by the document, is the area around Bray DART station. This is the first point of contact for tourists and others entering Bray by rail. It is crucial that this area is and appears to be well developed. The site opposite the DART station is currently significantly underused. If properly developed, this site and the surrounding area could prove to be an opportune link between the town centre and the sea front. Were there an effective link, the two could form a prosperous economic corridor for Bray's development that could far exceed the sum of the parts.</p>
C182 Martello Terrace Bray Residents Association	<p>The residents of Martello Terrace are very much in agreement with the designation in the draft Plan of Bray's station area as a key transportation hub and entry point to the town and on the need to develop this disgracefully near-derelict area (especially the former Cash and Carry site) to serve the needs of Bray's own commuters and residents and the many visitors to the town. Regrettably, previous efforts to enhance and revitalise this area have failed miserably and, regrettably also, the draft Plan contains little in terms of concrete ideas, much less plans, for the development of this vital area and previous efforts. Clearly some fresh thinking is needed if a viable and appropriate development scheme is to be identified and funded. The residents believe that there is a great deal of community interest in Bray in seeing something done with this area and it is their proposal that a public consultation exercise be carried out to identify some viable short- and medium- term options for the use of the site, as well as longer-term ones, beginning perhaps with a public meeting at an early date.</p>

Opinion of Chief Executive

The Bray GTH area comprises three distinct zones:

- The railway station, the railway line and other railway associated lands either side; and the public road
- Albert Walk
- Bray Bowl and former 'cash-and-carry' opposite the station.

The second two areas are privately owned and therefore the Local Authority is not a direct stakeholder in their development. The purpose of the GTH designation, read in conjunction with the other objectives of the LAP and the County Development Plan, is to encourage the redevelopment of these two areas, in a high density format, in a mix of appropriate uses.

With regard the first area i.e. the roads, footpaths, railway line, station, railway lands / yards etc, much of which is in the control of either the local authority or another state body, Iarnrod Éireann, there is a difficulty at this time in developing a meaningful short or medium term plan for the area when it is still unclear if it is intended to extend the LUAS to Bray. It is considered prudent that no impediments are put in the way of such an extension, and the Council will continue to work closely with the NTA and the transport providers to bring clarity and get confirmation of transport infrastructure plans. It is hoped that additional clarity will be brought to the matter through the Bray & Environs Transport Study currently being undertaken by the NTA, which coupled with their ongoing bus network improvement plan, may allow the short and medium term transport plans and how these needs should be accommodate at Bray Station, to be finalised.

The ideas suggested by the Bray Retailers Group are interesting and very forward thinking but a plan involving a change of use of the Carlisle Grounds from active sports use to mixed use transport hub / commerce / residential is not supported at this time. With regard to the roads and bridges suggested, again, WCC will continue to work with the NTA in particular to identify local infrastructure improvements needed to facilitate new and enhance public transport provision in the area.

Note: A number of issues raised in these submissions cross over with other topics (such as 'Open Space – Section 11 and Infrastructure - Section 14). The 'Carlisle Grounds' are addressed separately in this report in Section 11.

Chief Executive's Recommendation

No change

SECTION 3.17 (f) SLO 6 EMPLOYMENT LAND & NEIGHBOURHOOD CENTRE
BOGHALL ROAD – BRAY SCR

This section of the report deals with both submissions made relating to SLO-6 and the land adjoining to the west – neighbourhood centre.

Name	Issues raised
C8 Ballywaltrim & Wingfield Residents Association	<p>The proposal for a neighbourhood centre on the Southern Cross road is supported.</p>
C9 Barnaby Investments Ltd	<p>The submission on behalf of Barnaby Investments Ltd, the owners of the former 'Schering Plough' lands, in which the following suggestions are made:</p> <ul style="list-style-type: none"> - That the zoning of the site be changed from all 'employment' to 'neighbourhood centre' / mixed commercial' on southern part (2.8ha) and employment retained on northern part (2.4ha); - It is put forward that through the development of a north-south link road from Boghall Road to SCR as required by the plan, it is logical that the required 'neighbourhood centre' for the area should move eastwards; - It is put forward that without such a use to fund the new road, the road will not be provided. <p>It is suggested with respect to the 'Nechouka lands' (former Superquinn site):</p> <ul style="list-style-type: none"> ▪ The focus for these lands should be residential development, particularly on the western part of the site ▪ That mixed commercial / neighbourhood uses should occur as part of the neighbourhood centre development on the Barnaby lands <p>It is suggested that an integrated approach to the development of the two sites should be taken as:</p> <ul style="list-style-type: none"> - The development of the Barnaby site provides the potential for a new link road between the Boghall Road and SCR. There is potential also to provide for access from this road to the NS lands to the west - There are potential synergies between the 2 sites in terms of connections to infrastructure <p>It is also suggested that the list of uses typically allowed of 'employment' zones should include retail warehousing, medical use (including primary care) and motor sales.</p>
C14 I. Bodenham	<p>The submitter is a resident of Hollybrook Park for 20 years. It is suggested that rather than zoning scenic land for new housing at Kilruddery, consideration should be given to developing the vacant wasteland on the northern side of the SCR. This land was zoned for development 10 years ago and sold but nothing has happened yet.</p>
C18 Bray & District Chamber of Commerce	<p>There are currently sufficient neighbourhood centres available at the Boghall Road, Vevay Road and a number of large supermarkets all within a reasonable distance from the Southern Cross. Any proposed retail development in this large zoned area will have a negative impact on the existing businesses and traffic flows on the Southern Cross. The Chamber supports the rezoning of the lands on the Southern Cross identified as a 'new appropriately scaled neighbourhood centre' for high density residential (HD25) and Employment (E).</p>

<p>C21 Bray Retailers Group</p>	<p>1. Bray Retailers Group agrees with the designation of a neighbourhood centre on the SCR. The development of neighbourhood centres should be on a scale commensurate with the convenience shopping needs of the local residential areas beings served. In adherence with 'town centre' objectives, comparison retail should be restricted in neighbourhood centres.</p> <p>2. With regard to SLO 6, it is suggested that these lands be designated a 'strategic development zone' with a focus on life sciences and to gear the proposed developments in the SDZ towards investment in this field that could yield up to 1,500 jobs. The location is convenient with good access form the N11 and proximity to affordable housing. This could be a valuable real estate option for the IDA to present to investors in light of Brexit.</p>
<p>C66 T. Cookson</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>
<p>C93 M. Doherty</p>	<p>There are three sites close by, on the Boghall Road which are vacant and could be rezoned for residential use. This would use space that is 1. Idle and 2. Have residents nearer the town and shops and more frequent public transport. The 3 sites are 1. Dell, 2. Schering Plough, 3. A O Smith</p>
<p>C114 Durnin</p>	<p>The submitter is a resident of SCR since 1996. The submission, amongst other matters, raises the issue of lack of shops and general facilities along the road despite this being promised when they moved into the area.</p>
<p>C188 J. McCormick</p>	<p>Taking an organic/sequential approach, the remaining significant infill and opportunity sites around Bray e.g. the old golf club, Castle Street, Rockbrae and Dell sites, and mid-Boghall Road/Southern Cross sites , should be developed first (at a mid-high level density), before the rural /greenbelt fringes are re-zoned and/or highlighted for development under an LAP.</p> <p>Notwithstanding the previous permissions for a supermarket and mixed commercial, light industry/offices and a link road; the Boghall Road/South Cross 'NC' and 'E' zoned sites ('Superquinn' and 'Schering Plough' sites)) between Deer Park and Oak Glen View), should be highlighted in the LAP as suitable for development at a relatively high density and site coverage (not for surface car parking, as one of the few large Bray infill sites), with an emphasis on residential apartments e.g. like 'The Headland' Bray, or Mt. St. Annes and Bushy Park, Milltown/Terenure, as well as for the previously proposed commercial and community uses and link road.</p>
<p>C216 Nechouka Ltd</p>	<p>This submission is in support of the 'neighbourhood centre' zoning of the submitters lands (former 'Superquinn' site) and of the zoning definition / uses permissible on the site. It is put forward that these lands are strategically located to deliver appropriate NC uses which will contribute to the vibrancy and vitality of Bray and to the local needs of the community in terms of housing and support facilities.</p> <p>The following is requested in this submission</p> <ul style="list-style-type: none"> ▪ More detail about the size and scale of the retail / supermarket element acceptable on the lands; it is suggested that c. 1,700sqm GFA (1,300 sqm net) would be appropriate in this case.

	<p>With respect to the submission from Barnaby Investments: their submission is acknowledged and Nechouka supports same provided that this will not have an impact on the zoning of Nechouka lands.</p>
<p>C261 M. Rogers</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>

Opinion of Chief Executive

1. It is considered that there is a retail, retail services and community facilities 'gap' along the SCR when one considers the 'catchments' of other shopping and service centres in the area, particular for those accessing services by means other than car. The SCR is also lacking in an identifiable 'heart' - a place the resident community can identify with, meet, and access local services. All of the housing in the area is accessed from the SCR, rather than Boghall or Vevay roads, and it is considered this is the most accessible location for this neighbourhood.
2. The vision for the neighbourhood centre along the SCR is for a medium sized supermarket and a number of local shops, as well as retail services (such as hairdressers, cafes, professional services etc) and community uses (e.g. medical, childcare etc). In order to serve the catchment and having regard to the existing or proposed shopping and neighbourhood facilities at Vevay and Boghall Road, it is considered that a maximum 'supermarket' size appropriate would be 2,500sqm, plus 500sqm of additional retail / retail services / commercial uses and 500sqm of community uses. It is considered that this centre could be developed either as one overall integrated development or maximum three linked buildings in the same complex, with shared infrastructure such as car parking.
3. Such a quantum of development would not require the full 'NC' site (4.8ha) let alone an additional area of 2.8ha from the employment site adjacent. It is estimated that the land take required would be more in the order of 1.5-2ha.
4. In these regards, it is recommended that the 'NC' zoning is rationalised to 2ha maximum and that it be retained on the roadside frontage of the SCR on the existing NC zoned lands, which are considered the optimal in terms of the coverage 'gap' when one considers the catchment of existing retail facilities in the area.
5. With respect to the SLO – 6 / Barnaby site, there is no justification to change this employment zone to neighbourhood centre / retail use given the land demand detailed above nor is it as well located as that currently proposed. There is however an ongoing need for more employment development in Bray and the draft plan provides that a wide range of employment types can be considered in such zones. With regard to the suggestion that these lands be designated a 'SDZ' and directed towards 'life sciences', firstly the SDZ process is not intended for such use on an individual site and secondly, it is not considered appropriate to restrict the use of such employment land to one field.
6. Furthermore, it is not considered appropriate to allow for 'retail warehousing' on such employment lands, which are in general low in employment density yet high in traffic flows, which would be contrary to the sustainable development of the area and not best use of scarce serviced urban land (that is otherwise not suitable for residential development, as per their own submission)
7. With respect to the 'surplus' land on the Nechouka site (c. 1.5ha), it is considered appropriate to designate these lands for new residential development, at a density of 40/ha (i.e. c. 60 units). This is comparable with the number of units that was granted permission previously on these lands (42) as part of the previously permitted larger neighbourhood centre.
8. It is considered that the 'splitting' of the zoning on this site would allow for the provision of a 'green route'

through this site, providing a better route for the 'Swan River greenway' which would otherwise have to travel through an employment zone.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.17, as detailed in Part II of this report (p41)
2. Amendment No.18, as detailed in Part II of this report (p42)

SECTION 3.18 Zoning

This section of the report deals with the submissions that have been made with respect to Zoning.

Sub No.	Issues raised
C33 C. Burrell	Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. Specifically, there is a huge requirement for rejuvenation in what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Bray also has several sites such as the Dell Site, the AO Smith site, the Schering Plough site, the Superquinn site, the Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites. In particular, sites such as Bray Golf Club lands (which has begun though there are infrastructure, traffic and other issues to be resolved) and Rehills lands should also be prioritised being already zoned for residential and other land uses. One site appearing to have the most potential (which are supported) are zoned lands at Fassaroe, due to its size, location, access to roads and potential public transport links (see NTA Transport Strategy for the Greater Dublin Area 2016-2035) including possible employment benefits.
C118 A. Ffrench	<ul style="list-style-type: none"> ▪ Restrain, prevent urban sprawl and regenerate: rejuvenation the many industrial and derelict, abandoned sites/areas (Boghall Road, Killarney Rd). ▪ Revise draft Objectives and Zonings to re-balance towards more high-density residential and enterprise on mixed and single-use sites, e.g. Dell, A.O Smith, Industrial Yarns, Little Bray - and have been in decline over the past 5 years. We have a number of sites such as the Dell Site, the AO Smith site, the APC site and others that are in need of redevelopment and regeneration. These brownfield and derelict sites should be prioritised and redeveloped before we look at zoning or developing any greenfield sites.
C180 J & M Maguire	<p>This submission relates to lands between Sidmonton Court and Sidmonton Park owned by the submitters.</p> <p>The submission addresses the following issues:</p> <ul style="list-style-type: none"> • Error on Map No. GI1 Green Infrastructure. • Statement of Wicklow County Council's willingness to intervene to facilitate infill development. • Amendment of the description of the RE Zoning Objective. • Identification of opportunity sites for residential infill. <p>1.0 Error on Map No. GI1 Green Infrastructure</p> <p>In accordance with its long-standing residential zoning the submitters have made several applications for planning permission for residential development on the site in the last number of years. The most recent application, for a development of four houses (Reg. Ref. 15/462, ABP Ref. PL.27.245191), was granted permission by An Bord Pleanála. This decision by the Board is currently the subject of a judicial review.</p> <p>On <i>Map No. 2 Land Use Zoning Map</i> of the Draft LAP the site is shown zoned 'RE Existing Residential'. This is similar to the zoning objective of the current Bray Town Development Plan 2011-2017, in which the site is zoned 'RE1 Primarily Residential Uses' on Map No. 7. However, on <i>Map No. GI1 Green Infrastructure</i> of the Draft LAP the site is coloured green indicating that it is an area of 'Open Space and Parks'.</p>

The submitters believe that the property has been identified as an area of 'Open Space and Parks' on Map GI1 of the Draft LAP in error. The property is not an area of open space; it is a private property not accessible to the public, and it serves no recreation or amenity function. The property is a vacant infill residential development site, as indicated by (a) its 'RE' zoning on Map No. 2 of the Draft LAP, (b) its RE1 zoning on the Land Use Zoning Map No. 7 of the Bray Town Development Plan 2011-2017, and (c) by the previous decisions by Wicklow County Council and An Bord Pleanála which recognise the suitability of the site for residential development/use.

The submitters are concerned that by showing the site as 'Open Space and Parks' on Map GI1 of the Draft LAP, some confusion or ambiguity about the site's zoning objective and future use might arise. The submitters are also concerned that any future proposals for residential development of the site (if required, depending on the outcome of the ongoing judicial review), may be perceived as being in conflict with Green Infrastructure or open space policy of the Draft/future LAP. Accordingly, they request that Map No. GI1 be amended to exclude the property from the areas identified as 'Open Space and Parks'.

2.0 Statement of Wicklow County Council's willingness to intervene to facilitate infill development

The objective of consolidation of the Dublin metropolitan area (which includes Bray), through mechanisms including the reuse of underutilised and/or brownfield sites and the facilitation of infill development, is supported by planning policy at national, regional and local level. Another key national policy document in this regard is the *Sustainable Residential Development in Urban Areas Guidelines 2009*. In Section 5.9(i) of the Guidelines, regarding infill residential development, it is stated:

"Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands."

The submitters request that in accordance with the *Sustainable Residential Development in Urban Areas Guidelines 2009*, the Draft LAP be amended to include a statement that Wicklow County Council will intervene where necessary to facilitate access for infill and backland development.

The submitters suggest that such a statement could be added to Objective R4 of the Draft LAP, as follows (the black text is as exists in the Draft LAP; the red text is the proposed addition):

*"To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish. **The Planning Authority will intervene where necessary to overcome barriers to appropriate infill housing development, including by facilitating the provision of access to infill and backland sites.**"*

3.0 Amendment of Description of the RE Zoning Objective

Infill and backland sites are often constrained by real and perceived 'barriers' to development, particularly with regard to provision of access to sites. Such a barrier has been used to block development of the submitters property on past planning applications (specifically, the requirement to access the site by providing an access lane crossing a green verge area and public footpath which form part of the existing Sidmonton Court public open space). This experience is not unusual with regard to infill sites.

Given this history, and the statement in the *Sustainable Residential Development in Urban Areas Guidelines 2009* that 'Local Authority intervention may be needed to facilitate infill development, in particular with regard to the provision of access to backlands', the submitters suggest that the description of the RE zoning objective in the Draft LAP be amended to help to overcome unnecessary barriers to appropriate development.

The submitters suggest that the wording of the description of the RE zoning be changed in the table in Chapter 11 of the Draft LAP, as follows

RE: Existing Residential

To provide for house improvements, alterations and extensions, and to facilitate appropriate infill residential development, in accordance with principles of good design and protection of existing residential amenity.

In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing dwellings or other non-community related uses that significantly impact on such open space areas will not normally be permitted.

These minor changes would allow for the Council to apply a greater degree of discretion in determining applications where some residential-related development (as opposed to housing or dwellings per se) is required in open space areas to facilitate appropriate infill in RE zoned areas.

4.0 Identification of Opportunity Sites for Residential Infill

The submitters welcome the inclusion of objective R4 in the Residential Development Strategy for Bray MD in the Draft LAP:

"To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites..."

The submitters welcome the following statement regarding the phasing of development, on p.73 of the Draft LAP:

"It is an objective of the Council that development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided;*
- *A strong emphasis should be placed on encouraging infill opportunities and better use of underutilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.*

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal."

These draft policies recognise the importance of, and support, the development of infill sites in accordance with the principles of sustainability and sequential development.

Furthermore, they are in accordance with national, regional and county planning policy. The submitters note that in Section 5.5 of the Draft LAP, a number of 'opportunity sites' are identified. These are sites which if developed, *'would contribute to the enhancement of the public realm, vibrancy and vitality, and the retail / services offer in the town centre'*. The submitters submit that meeting housing demand and targets is of at least equal importance to objectives of public realm enhancement, vibrancy and vitality, improvement of the retail/services offer.

The potential housing yield of lands zoned for residential development in Bray and Environs is set out in Table 3.1 of the Draft LAP. In this table, 200 no. units are identified as the potential yield from the category 'Infill on other TC / RE lands'. 200 is the fourth largest yield figure in the table, after the areas of Fassaroe, the Former Bray Golf Club and Kilruddery, which can be considered strategic residential sites/areas.

The submitters submit that given the potential housing yield of the collective infill lands, their development should be further encouraged and given some certainty by identifying key residential infill opportunity sites. This is supported by the following considerations:

- a) the high potential yield of the 'infill lands';
- b) the importance of development of these lands for meeting the housing targets for Bray, Co. Wicklow and the Dublin Metropolitan Area;
- c) the principles of sustainability and sequential development that seek to ensure that lands well served by existing services and infrastructure including public transport are developed first, and
- d) the developability of these lands owing to the relative lack of constraints, and the lack of enabling works and infrastructure required.

The submitters therefore request that the Draft LAP be amended to identify infill residential opportunity sites in Bray, and this site between Sidmonton Court and Sidmonton Park be included as such an infill residential opportunity site.

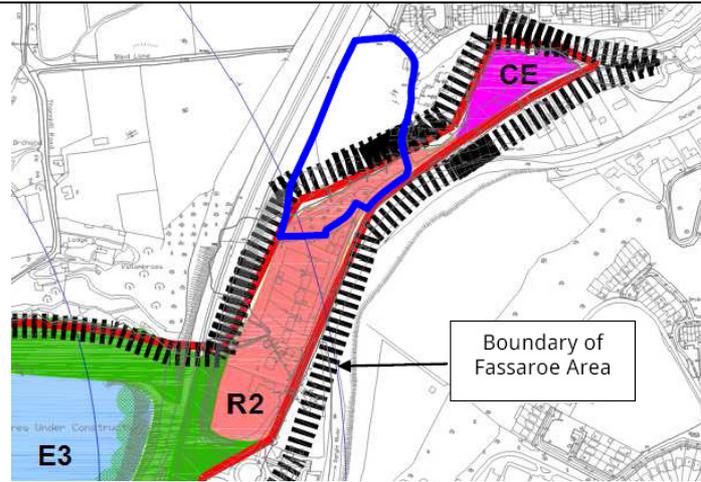
There are no significant barriers to development of the site. It is an area of unused land in the heart of an established residential neighbourhood central to the town of Bray and within the Dublin metropolitan area. It benefits from excellent existing services and infrastructure including public transport, with bus stops and the DART station 5-10 minutes' walk away. In its current condition and use it represents an unacceptable and unsustainable waste of valuable resources.

The identification of infill residential opportunity sites including this site in the Draft LAP would constitute effective forward planning, enabling the realisation of the Draft LAP's (and the national, regional and county plans') policies on urban consolidation through infill.

As well as furthering the realisation of national, regional, county and emerging local planning policy, this change to the Draft LAP would be in accordance with the Department of Environment, Community and Local Government's *Planning Policy Statement 2015*. Among the Key Principles of the Planning Policy Statement are the following:

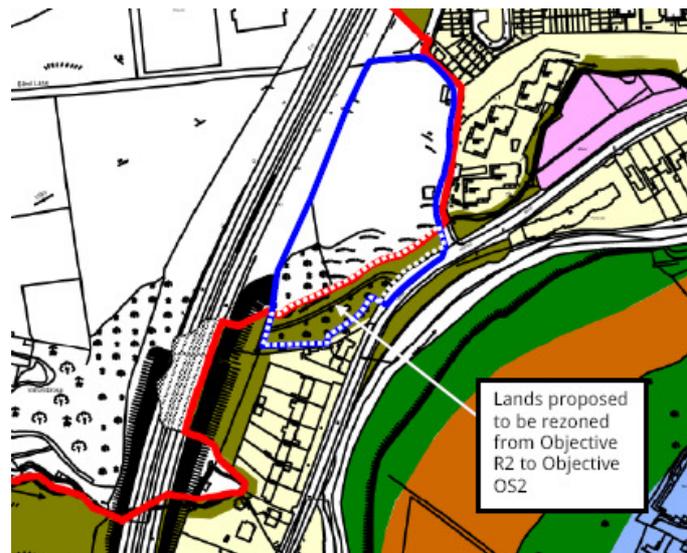
1. *Planning must be plan-led and evidence based...*
2. *Planning must proactively drive and support sustainable development...*
3. *Planning is about creating communities and further developing existing communities in a sustainable manner...*

	<p>5. Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people in support of active and healthy lifestyles by focusing development, whenever possible, at locations with more sustainable travel options...</p> <p>6. Planning will encourage the most efficient and effective use of previously developed (brownfield) land over the use of greenfield land to ensure the most efficient use of existing infrastructure."</p>
<p>C186 M. McAteer & P. Dillon joint receivers over certain assets of George Wilkin</p>	<p>This submission is made on behalf of Michael McAteer and Patrick Dillon, Joint Receivers over Certain Assets of George Wilkin (In Receivership).</p> <p>This submission is made in respect of the proposed rezoning of lands on Upper Dargle Road/Love Lane, Bray. This submission seeks to present the case to amend the Draft Local Area Plan to adjust the extent of the proposed zoning Objective 'OS2' of the lands and to rezone a part of the lands for residential purposes.</p> <p>Location of Subject Lands</p>  <p>Current Zoning of the Subject Lands</p> <p>The subject lands are zoned objective 'R2' -"New Residential - Medium to Low Density" in the Bray Environs Local Area Plan 2009-2015. The vision of the objective is to ensure that the proposed medium to low density residential development is undertaken in a sustainable manner and that in particular regard is had to the provision and accessibility of social and community infrastructure. The lands are included within the Fassaroe section within the Local Area Plan area. For the purposes of this section, the lands zoned R2 are identified at an average density of 50 units per hectare.</p>



Proposed Zoning of the Subject Lands

In the Draft Local Area Plan it is proposed that the subject lands are to be zoned Objective 'OS2: Open Space': "To protect and enhance existing open, undeveloped lands". The purpose of the objective is "to protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity."



Submission in support of request to amend the Draft Local Area Plan

This submission seeks the amendment of the Draft Local Area Plan to adjust the extent of the proposed zoning Objective 'OS2' of the lands and to rezone a part of the lands for residential purposes.

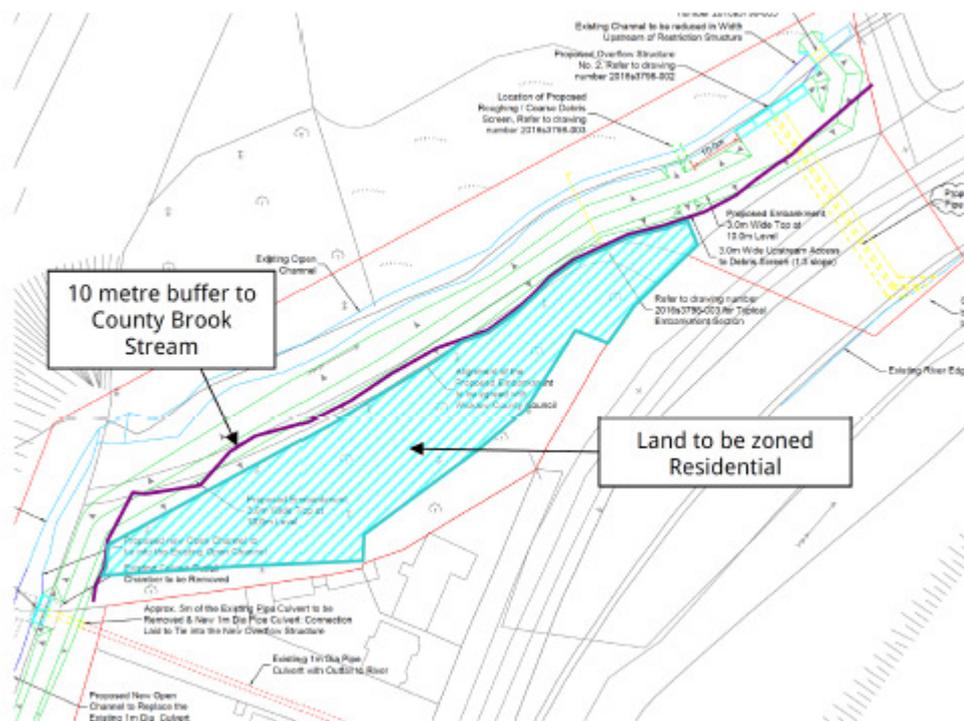
A review of the Draft Development Plan would indicate that the proposal to rezone the subject lands (as Objective OS2) is based on the strategy of providing for a Green Infrastructure within the Plan area.

It is acknowledged that the strategy of establishing a network of green spaces and the key environmental and community benefits for doing so have merit; however it is submitted that the contribution that the subject lands makes to the achievement of this strategy is moot. The lands do not connect with any of the other lands it is proposed to zone either Objective 'OS1' or 'OS2' – the N11 is to the east and the southern bank of the River Dargle is across Upper Dargle Road and the river itself. As a consequence of undertaking the minor

realignment of the County Brook Stream, all of the mature trees and undergrowth on the lands that provided its naturalistic setting have been removed and the lands have effectively been cleared. Further, it is unclear to what extent the lands will be landscaped after the realignment and associated earthworks have been completed.

It is submitted that given the above, at present the subject lands would not be an effective part of a Green Infrastructure within the Plan area.

Notwithstanding, it is acknowledged that in the future the lands could be an effective part of a Green Infrastructure within the Plan area; however it is submitted that the entire of the subject lands would not be required to be zoned Objective 'OS2' for it to do so. As a consequence of the minor realignment of the County Brook Stream and particularly the embankment that will be constructed along the southern side of the Stream, the lands are on either side of the Stream effectively a form a corridor as opposed to a wider open space. The southern edge forms to southern extent of this corridor. Between this, and the 10 metre buffer area (from the Stream) required under Objective GI3 of the Draft Local Area Plan, and Upper Dargle Road there is a residual part of the subject lands that will be fully protected from flooding from the Stream that have frontage onto the adjoining public road.

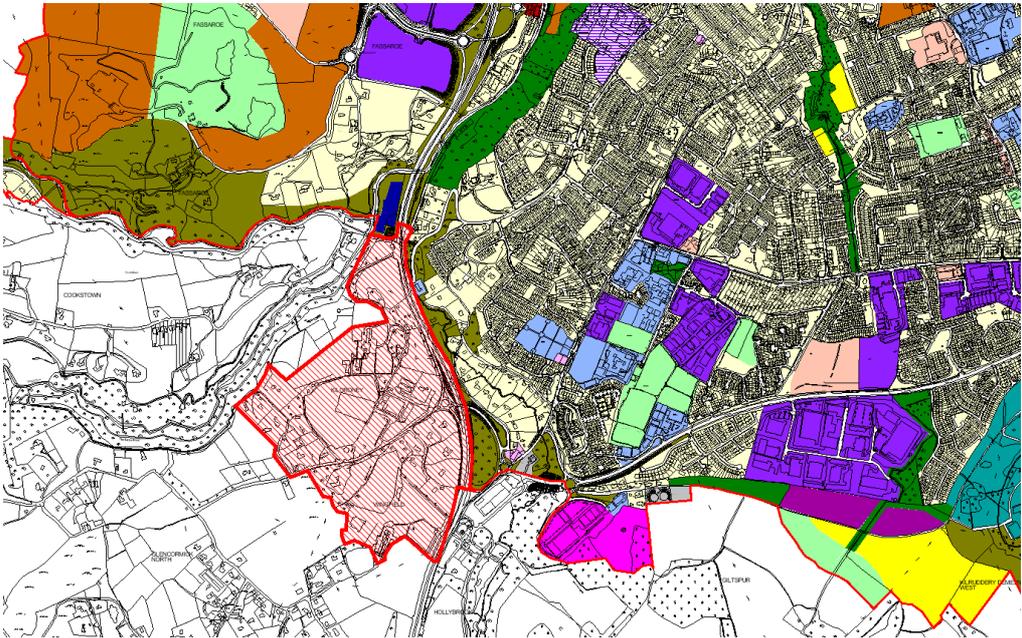


It is submitted that this part of the site is appropriate for residential development. Residential development would reflect the existing residential development to the south and represent of continuation of same. It is therefore requested that the lands identified in Figure 5 below are rezoned from Objective 'OS2': "Open Space" as proposed in the Draft Local Area to Objective 'R20': "New Residential"

C188
J. McCormick

Taking an organic/sequential approach, the remaining significant infill and opportunity sites around Bray e.g. the old golf club, Castle Street, Rockbrae and Dell sites, and mid-Boghall Road/Southern Cross sites, should be developed first (at a mid-high level density), before the rural /greenbelt fringes are re-zoned and/or highlighted for development under an LAP.

Notwithstanding the previous permissions for a supermarket and mixed commercial, light industry/offices and a link road; the Boghall Road/South Cross 'NC' and 'E' zoned sites ('Superquinn' and 'Schering Plough' sites)) between Deer Park and Oak Glen View), should

	<p>be highlighted in the LAP as suitable for development at a relatively high density and site coverage (not for surface car parking, as one of the few large Bray infill sites), with an emphasis on residential apartments e.g. like 'The Headland' Bray, or Mt. St. Anne's and Bushy Park, Milltown/Terenure, as well as for the previously proposed commercial and community uses and link road.</p>
<p>C255 S & T Reihill</p>	<p>The submitters are the owners of 5.5ha of lands at Kilcrouney Lane (extent of submitters' landholding not shown).</p> <p>This submission suggests that the Bray plan boundary is extended to include the lands shown to follow (red hatching) to provide for an integrated development of a new neighbourhood. To include a Specific Local Objective (SLO) to develop this land, as new residential neighbourhood with mixed residential, commercial, educational, community and open space uses, with appropriate requirements, and appropriate densities.</p>  <p>In support of this submission, it is put forward that:</p> <ul style="list-style-type: none"> ▪ The lands fit in with the development vision for Bray. ▪ The lands are adjacent to Junction 7 of the N11. ▪ It is an existing multi-landuse area with 2 schools, a furniture warehouse and two distinct pockets of housing. ▪ There is a need for housing land in Bray, in addition to the key sites of the Former Golf Club Lands and Fassaroe. ▪ There are no environmental designated sites nearby. ▪ There are water and waste services in the area. <p>The submission includes a detailed 'technical' report from consulting engineers with respect to traffic and access and water services.</p>
<p>C261 M. Rogers</p>	<p>Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict</p>

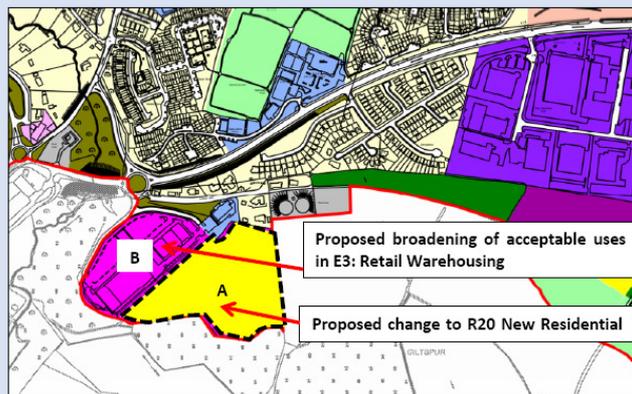
	<p>sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.</p>
<p>C277 TIO</p>	<p>The submission relates to lands measuring c.9.8 hectares at Giltspur.</p> <p>These lands were zoned in the Rathdown District Plan no. 2 to accommodate 'E1' – employment land uses' where large scale retail warehousing is identified as a '<i>normally permitted</i>' use and office is identified as an '<i>open for consideration</i>' use. Bray Retail Park is contained on c.5.8 hectares of this land holding. The balance of the zoned land (c.4 hectares) remains undeveloped.</p> <p>Following a detailed review of the Draft Local Area Plan, it is noted that there is no reference to 'Retail Warehouse' Uses however since the draft was placed on public display Wicklow County Council has issued a clarification confirming that the '<i>Retail Warehousing</i>' use was been omitted in error from the zoning table as published. The clarification states that this matter will be formally dealt with at the proposed amendments stage of the plan making process. Proposed Map No.2 Land Use Zoning indicates purple shading on the submitter's lands however the key does not indicate to what use this shading relates. For the purposes of this submission it is assumed that this shading is the '<i>E3: Retail Warehousing</i>' land use zoning objective referred to in the clarification issued by the Council.</p> <p>The submitter welcomes the zoning objective proposed reflecting existing retail warehousing uses on the site (Bray Retail Park) however submits that the range of uses which are acceptable on the zoning are too narrow. In this regard, the submitter is seeking that land uses listed as being acceptable within this objective is broadened to include office and other employment generating uses.</p> <p>As noted above, Bray Retail Park is accommodated on c.5.8 hectares with the balance of the land holding remaining zoned but undeveloped. A review has been undertaken by the submitter to determine the potential uses appropriate to the subject lands location and context. Clearly the prolonged recession and imbalances in the housing market have resulted in a critical shortfall in well-designed housing located in appropriate locations – close to existing transport links, infrastructure and social infrastructure. As a result of the submitter's review, this shortfall, the character of the site and servicing infrastructure currently in place, it is proposed that the undeveloped lands adjacent to the existing retail park be considered to accommodate residential uses. Planning permission on the site (planning reg. ref. 08/811) confirms the site's ability to absorb development at this location. The character and setting of the site is in the submitter's view more akin to a residential development and provides readily available serviced land in a sustainable location proximate to existing services and infrastructure. This site can be delivered immediately by a reputable developer subject to it being designated with the appropriate zoning objective.</p>

Changes requested:

Block A: A change from 'E3: Retail Warehousing' to 'R20: New Residential'- 'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities'.

Block B: Maintain 'E3: Retail Warehousing' zoning objective and expand the range of uses allowable to include office and other employment generating uses.

Proposed land use zoning changes

**Opinion of Chief Executive****General**

As part of the plan crafting process, all derelict, abandoned or underutilised sites were carefully examined with a view to determining if an alternative development approach / zoning etc was appropriate and indeed whether any of these sites would be suitable for new residential development. Every opportunity to meet the housing growth target from such sites was taken, and in the majority of cases, a high density objective applied e.g. Heitons, former Dawson's, Dell, FCA, Brook House, Presentation College, Oldcourt, Ravenswell, Everest, The Maltings etc. The draft LAP also makes specific provision for infill on existing developed land in the town centres and living over the shop (Objective R4). The plan specifically encourages and provides a framework for the high intensity redevelopment of underutilised / brownfield sites, including the sites mentioned and the Council will utilise all of its power to encourage / induce the development of these sites e.g. by providing for a wider range of uses on some sites to 'kick start' development, application of vacant sites levy etc.

It was only after it was determined that the housing targets could not be met on brownfield sites that consideration was given to new 'greenfield' zoning. It is an overriding objective of the plan to contain the development of Bray; however, in order to meet the housing targets of the regional and county plan and provide for new housing in the town most in need of same, it has been necessary to zone 'greenfield' lands, particularly focused on Fassaroe. It is intended that development at Fassaroe will be of a high density, in order to minimise the land take required.

Backland infill development policies

Notwithstanding the section quoted from the 'Sustainable Residential Development in Urban Areas Guidelines', it is not considered appropriate to include the suggested provision in this Local Area Plan in circumstances where Wicklow County Council does not intend to intervene to facilitate infill development *generally*, regardless of the size, scale and type of development / barrier involved. Wicklow County Council can and will utilise its powers in making its own land available, by acquiring land or indeed using CPO powers in circumstances it deems appropriate and **essential**, such as for highly significant and / or strategic projects.

Definition of 'RE' – existing residential

The change suggested in submission C180 is not supported.

1st paragraph: The suggested addition of the words 'to facilitate' does not in any way change the meaning of this paragraph and is superfluous. 'To provide for' and 'To facilitate' are considered to be the same things i.e. permission will be considered for such forms of development

2nd paragraph:

- (a) the insertion of the word 'dwelling' is wholly unnecessary as 'housing' includes dwellings
- (b) It is not considered necessary to include the phrase '*that significantly impact on such open space areas*' as it is clearly stated that new housing and other non-community related development 'will *not normally be permitted*' which implies that there may be circumstances where such uses **might** be considered. Those circumstances in practice are when for example the uses of the open space for the alternative use does not significantly impact on the amount, usability or safety of an existing open space.

Retail warehouse zoning – E2

In error, the 'retail warehousing' code was left off the draft plan when initially published. This was quickly corrected. In order to ensure this correction is put on a legal footing, it is recommended that this correction be the subject of a formal amendment to the plan.

The rationale for the requested expansion in the range of uses allowable in the E2 zone at Bray Retail Park is unclear – these lands are already fully developed for retail usage and it is not clear what change the suggested amendment could bring about. There is sufficient land zoned in Bray and its environs for general mixed employment, offices etc and limited lands designated for 'retail warehousing' and therefore this change is not recommended if we are to continue to aim to stem the flow of expenditure from the County to retail parks in Dublin.

However, with respect to the rest of this zone, which is undeveloped, it is considered reasonable that a wider range of general employment uses be allowed.

Maguire land Sidmonton Park

The lands in question are zoned 'RE' in the draft plan. Such a zoning would allow for new infill residential development if deemed appropriate given the characteristics of the site and the area.

In the 'green infrastructure' map associated with the draft plan, GI 'assets' are indicated. This is not a 'zoning' map and lands shown as say 'open spaces and parks' might include currently undeveloped land, even if said lands are zoned for new development. However, this is not applied consistently across the plan area, **in error**. It is agreed that this is confusing and anomalous and therefore the GI map is recommended to be revised to omit lands that are identified for new development or 'RE' that are not currently in 'open space' use, as these are not intended to be 'retained' as GI assets. That said, the objectives of the plan, in conjunction with the provisions of the County Development Plan, will ensure that any green assets such as mature trees, on any development site, will be protected to the degree that is necessary and appropriate on any site.

The identification of these lands as an 'opportunity' sites is not supported given the very small scale of the land involved – the opportunity sites identified through the draft plan and much more significantly in both housing yield and employment. Furthermore, it is not considered reasonable or feasible to identify every single possible RE infill site as much of the land that might be suitable for infill currently forms part of private homes and it is not known if such sites are likely to come forward for development or indeed whether any barrier might exist of any given site e.g. with respect to ownership, boundaries or underground services.

Wilkin, Dargle Road

These lands were not zoned for housing in the basis of (a) flood risk identified and (b) protection of the natural condition of the stream corridor in the interests of biodiversity and amenity.

Works have been undertaken as part of the Bray Flood Defence Scheme to reduce flood risk on these lands. The works undertaken involved some in stream channel improvement and the construction of an embankment along the stream. These works have however only addressed the '1:100' risk i.e. removed the land from Flood Zone A, but the lands remain at risk of a 1:1000 flood event (i.e. are now located in Flood Zone B). In accordance with the flood risk guidelines, the zoning of such lands for residential use can only be carried out if the lands pass the 'justification test'.

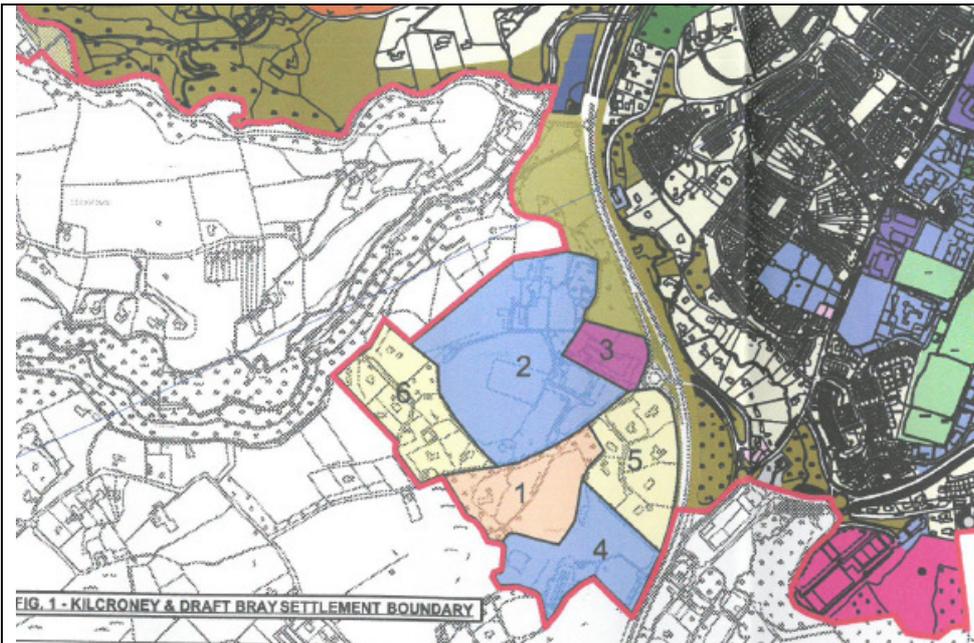
Justification Test	
The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, (as amended.)	Under the Wicklow County Development Plan 2010-2016, Bray is designated a 'Level 1 – Consolidation Town' within the metropolitan area of Dublin. Under the 'core strategy' of the CDP, the population of Bray town and environs is targeted to grow to 40,000. It is prioritised to accommodate a significant amount of population growth, to be a strong active town that is economically vibrant with high quality transport links to larger towns/cities.
The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
(ii) Comprises significant previously developed and/or under-utilised lands;	No
(iii) Is within or adjoining the core of an established or designated urban settlement;	No
(iv) Will be essential in achieving compact or sustainable urban growth;	No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	No
A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	Assessment of flood risk has been incorporated into the Plan SEA process.
Conclusion	
Justification test failed.	

On this basis, the zoning of the land for residential use is not recommended.

Submission C255 - Kilcronee

It is noted that the area in question is partly developed. It would appear that the request for designation of this wider area as a 'SLO' area or new 'neighbourhood' is essentially for the purpose of seeking the residential zoning on one parcel of land measuring c. 5.5ha, unless of course a change of use is being proposed for the existing school sites adjacent. The following drawing is included in the submission, which shows the existing developed land uses and the land that appear to be being suggested for 15/ha type housing development (marked 1)³¹:

³¹ 2 = Dublin Oak Academy, 3 = Kilcronee Furniture, 4 = Woodlands Academy, 5 = Wingfield housing estate (8 houses), 6 = Millicent Lane (5 houses)



On this basis, the proposed rezoning and / or designation of an entirely new neighbourhood is not recommended as such zoning would not accord with the zoning principles set out in the Wicklow County Development Plan:

- Application of the 'sequential approach' whereby zoning extends outwards from centres, contiguous to the existing built up part of the settlement;
- promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;
- promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritized;
- lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritised;
- cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;
- the need to maintain the rural greenbelt between towns; and
- promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones.

The lands proposed for new residential development are distant from existing services, including employment, retail and education. There are no existing and no planned future public transport services in this area – all movements would be private car based and therefore would not be consistent with sustainable development principles.

Furthermore, notwithstanding recent TII report on N/M11 improvements, until significant improvements to the Kilcronney interchange are undertaken, additional traffic movements as would be generated by the proposed development could seriously contribute to the significant capacity and delay issues already experienced at this interchange. The proposals are therefore considered premature in this regard.

'TIO' site (Bray Retail Park)

It is not recommended that the lands to the rear of the 'Bray Retail Park' are changed in zoning from E2 to R20 for the following reasons:

- the access to the lands would not be optimal for a major housing development – the only access is via the driveway to the retail park and by following a route around the back of the retail warehouses past a

large crèche. Behind the retail warehouses is a very steep embankment and thereafter the lands in question display a gradient of approximately 1:10 which would entail complex road layout on site; in contrast, were the site developed for retail warehousing, it is likely that development would be located on a single 'plateau' created on the site;

- having regard to the steep gradient on site, a complex layout would be likely required, involving platforms, retaining walls and challenging open spaces;
- it is assumed that it is proposed that housing development would take place on the entirety of the lands; this would entail development up to the 105m contour i.e. roof heights of c. 100m - 115m. This is significantly higher and intrusive on the landscape than any other development in the area (highest houses at Deepdales at the 80m contour).
- the lands are quite disconnected to local services, with no connecting routes available to access school / community facilities other than through the existing retail park and busy roundabout at the SCR. The access route to the retail park has no or narrow footpaths and no cycling facilities as a result on the sloping nature of the land, which entailed the construction of significant retaining structures to create just the road into the site. To the west side of the road, the land drops away quickly to a stream. In these circumstances, it is not clear how improvements could be made to provide for pedestrians and cyclist generated by a major housing site.

APC site

The APC site is zoned for 'employment' use being in an established and operating employment area and is not considered suitable for residential use.

The **AO Smith, Dell** and **Schering** sites are dealt with separately in this report (see Section 3.17)

With respect to the Industrial Yarns site, this is not in Co. Wicklow

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.18, as detailed in Part II of this report (p42)
2. Amendment No.20, as detailed in Part II of this report (p49)
3. Amendment No.22, as detailed in Part II of this report (p51)

SECTION 3.19 MISCELLANEOUS

This section of the report deals with the submissions that have been made with respect to miscellaneous topics.

(a): DESIGN

Sub No.	Issues raised
C8 Ballywaltrim & Wingfield Residents association	'Tidy Towns' adjudicators have commented on the proliferation of roller blinds on shopfronts along the main street, which have a deadening visual impact at night. A prohibition against roller blinds should be included.
C18 Bray & District Chamber of Commerce	<p>The quality of shop fronts within the Town Centre is relatively poor and some of the responsibility has to be taken by the Local Authority in failure to enforce its own planning regulations and to ensure that new shops have high quality shop fronts consistent with the architectural heritage of the town.</p> <p>The LAP should include the intention to employ an architect to oversee all building works not just in the core area of Bray but also in Enniskerry, Kilmacanogue and Kilmurray. This will ensure there is a consistency of design to protect, enhance and improve the quality of shop fronts and signage and to maintain and improve the appearance of these core areas. The architect should be mandated to be proactive in this regard and approach owners of building to encourage improvement and remedial works as he/ she deems appropriate. At the end of the LAP it should be possible to quantify precisely the work achieved as a result of this initiative.</p>
C85 A. Deveney	<p>As stated in the Wicklow Development Plan 2016-2022 <i>"the quality of shopfronts within Bray Main Street and surrounding side streets is relatively poor"</i>.</p> <p>The previous Bray Town Development Plan 2011-2017 set out guidelines and general design principles to protect the essential character of the town. These were set out in Sections 12.4 Retail and Commercial Development, 12.5 Shopfronts, 12.7 Advertising and Signage. The Draft Plan offers no such guidance, nor does the Wicklow County Development Plan 2016-2022.</p> <p>Recent years have seen an increase in the number of inappropriate and shoddy shop fronts, shop signs and advertisement banners in the town. The submitter believes that the retail areas of the town of Bray require greater attention in the Draft Plan. At the very least, the previous guidelines should be included. At best, areas of the town should be designated as Architectural Conservation Areas to ensure that what remains of the Victorian heritage of the town is preserved to the greatest extent possible.</p>
C242 M. Parsons	<p>The submitter welcomes the objective within the Draft Bray Local Area Plan to <i>'improve the quality of the overall appearance of the town and seafront area, including shopfront improvements'</i>.</p> <p>The submitter believes an improved overall appearance will encourage footfall, business and as a result the overall viability of the town. Bray Main Street, Quinsboro Road and Florence Road have a rich heritage however the quality of shopfronts result in a view of low cost and low quality wares.</p> <p>As such the submitter is of the opinion the clear guidance is required for retailers, with simple guidelines to provide quality shopfronts, much of which can be undertake without planning permission or through a Section 5 process. There are numerous shopfront guidelines which have been produced by County Councils through the country. The submitter is of the opinion that a simple reference check is required, which is user friendly for store owners and</p>

businesses, and this should form part of the Local Area Plan.

The submitter acknowledges the guidance within the Wicklow Development Plan for shopfronts, and appreciates that this forms an overall guideline for Bray. The submitter does however suggest that it is an objective of the Local Area Plan to:

Undertake an audit of all shopfronts in Bray Main Street, Quinsboro Road and Florence Road is undertaken. Recommendations and suggestions for improvements are to form part of the audit process.

The submitter is of the opinion that shop owners require guidance to improve the appearance of the main retail area and that Bray Municipal District, through the development plan are best suited to provide this. The submitter is aware that there are many individuals and groups that would be willing to liaise with Bray Municipal district in the preparation of such an audit.

Opinion of Chief Executive

Shop fronts

It is agreed that the quality of some shop front is poor, and the Council, where feasible, utilises its powers under the Planning Acts to address unauthorised developments. The Planning Authority also as a matter of course implements the design provisions set out in the County Development Plan for new shopfronts (where such shop fronts apply for permission).

There seems to be an impression that there are no longer any standards for shop front applicable in Bray, however as set out clearly in the introduction to the plan:

"The majority of policies, objectives and development standards that will apply in the Bray Municipal District are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in this Local Area Plan, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the area. While this will facilitate the streamlining of this plan to just those issues that are relevant to this area, and an overall reduction in the content of the plan, this should not be seen a diminution of the level of importance or indeed protection afforded to this area.

In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated. Any specific policies / objectives or development standards required for this area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans, and the general public alike".

Detailed shop front design standards are set out in Volume 3, Appendix 1, (p37) of the County Development Plan and these are directly applicable in Bray (in fact, these County wide standards were prepared for Bray).

It is considered that these design standards are very clear and user friendly; there would not appear to be any benefit or need to prepare a separate document essentially setting out the same requirements. The preparation of a standalone guide, with additional information and guidance on exemptions that might be applicable, could be considered as an implementation action, post plan adoption, by the Planning SPC.

With respect to roller shutters, these design standards stipulate:

- *Solid external shutters which completely cover the shopfront when closed have a major impact on the street scene and therefore will not be permitted;*
- *Where there is an obvious need for enhanced security, the use of alternative methods of protection should be considered, for example:*
 - *toughened / laminated glass, which incorporates a plastic interlayer and can remain intact even when broken;*
 - *additional glazing bars reduce glazing size, thus strengthening glass area and reducing opportunities for theft;*

- *internal open-mesh window grilles, fixed inside shop windows behind glass, allow views into the shop even after hours and give a less fortified appearance than external grilles.*

Architect

The LAP is a land use framework, and it would be beyond that remit to include an objective to employ an architect; this would be an operational and funding matter for the Local Authority.

Chief Executive's Recommendation

No change

(b): PLAN PROCESS & CONSULTATION

Sub No.	Issues raised
<p>C18 Bray & District Chamber of Commerce</p>	<p>The Chamber welcomes the preparation of an LAP and agrees with the vision and sentiment set out in the Chapter 1 and Chapter 2 of the document. To avoid the plan being simply aspirational rather than achievable it is desirable that there be a regular six monthly or annual review mechanism within Wicklow County Council to ensure that the plan is being actioned.</p>
<p>C33 C. Burrell</p>	<p>The submitter would like to point out that she strongly object to the fact that in the past, the Manager's Report only lists the name of those who made submissions and not the actual submissions themselves and hope that this will be rectified during this current consultation process. This results in Co. Wicklow Councillors not being given the opportunity to see what residents, issues and other concerns were presented and highlighted (including proposed land zonings). It also would specifically assist to inform Councillors not residing in the Bray and surrounding areas, who will be voting on these proposals, any proposed amendments and the adoption of this Plan. It is generally the case that Reports list the content of lodged submissions in a report (as an Appendix) as is the case with other Local Area Plans in other Counties. I would like to request that any submissions lodged in relation to this draft Bray LAP be listed in a Report and a copy given to each of the 32 Co. Wicklow Councillors.</p> <p>I believe that the process involved in drafting the Bray Local Area Plan is flawed for a number of reasons: This LAP should be part of a joint approach taken between Bray Municipal District Council & Wicklow Co. Council that includes involvement of all WCC officials and Councillors in this statutory process. The Bray LAP process should have been carried out at the same time as the Wicklow County Development Plan (2016 – 2022) and others, to ensure a joint up approach is taken to cover all aspects which would ultimately be more beneficial to both residents and Councils involved. The lack of this approach, as has occurred in the past, may result in planning, transport, housing etc. being piecemeal and not carried out in joined-up and sustainable ways.</p>
<p>C118 A. Ffrench</p>	<p>Process and Public Engagement</p> <p><i>"Planning is fundamentally about people and places, about the communities we live in and their futures. In planning for all our futures we have to consider the whole country, its physical infrastructure and our social and economic aspirations, while also striving to meet and address local issues and needs through the alignment of local area planning with city and country development plans, regional planning guidelines and national planning objectives. Accordingly, these Guidelines have been developed in recognition of the importance of good planning practices for local communities, their place in the wider planning context, and of the importance of those communities' involvement in the planning process."</i> Minister's Foreword,</p>

Mr. Phil Hogan TD. June 2013. Local Area Plans - Guidelines for Planning Authorities.

Mindful of the emphasis on "people and places" and "communities' involvement" in the above quote, the submitter wishes to make a number of remarks in relation to how the planning authority prepared, published and promoted the Draft Plan. These remarks are directly informed by government policy on local government and spatial planning – 'Putting People First - Action Programme for Effective Local Government' LAP guidance 'Local Area Plans - Guidelines for Planning Authorities' and 'Manual for Local Area Plans' and finally, by the degree of public engagement, to date, between public and planning authority; as required by all three aforementioned government policies:

It is suggested that the final plan-making stages by WCC would benefit from an improved engagement with both public and councillors, particularly a 'reaching-out' to local communities most affected by the proposed land-use zonings and objectives in the Draft (e.g. Kilruddery Demesne - SCR residents), before putting pen to paper.

Regarding Kilruddery, the failure to fully and properly engage in prior consultation and participation, has damaged credibility and trust between the public and the planning authority; and been ineffective and inefficient use of time and resources. Given the degree of opposition emerging from the public, T.D, local residents and the landowner, it will likely results in careful re-considered. All this was avoidable and unfortunate in terms of gaining and building credibility and confidence with the public. There is a danger it may contribute to an ongoing public and media perception of mediocrity in the administration and effectiveness of planning in WCC.

Suggestion: Generally in future WCC Local Area and Framework Plans - and particularly in the remaining stages of this Draft LAP – that the planning authority adopts and fosters a more open and dynamic engagement with communities and the public. Creative engagements might best be nurtured and delivered using trained (planning) facilitators and community development specialists with requisite pedagogic skills. Such an approach was used successfully by WCC in the late 1990's, for the EU-funded S.R.U.N.A planning/landscape management project for Bray Head. (in the late 1980's Dublin Corporation used a similar approach with the Ballymun Task Force).

Opinion of Chief Executive

Review & implementation

There is no formal annual or 'mid-term' review process required in the Planning Act for Local Area Plans. However, on foot of this and other submissions, it is recommended that a more detailed 'implementation' programme envisaged is set out in the plan.

Format / content of Manager's Report

The format and content of the CE's report is prescribed in the Planning Act as follows:

20 (1) 3(c)(ii) A report under subparagraph (i) shall—

(I) list the persons who made submissions or observations, (II) summarise the issues raised by the persons in the submissions or observations,

(III) contain the opinion of the manager in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

It has never been practice in such reports to simply list names and not summarise this issues raised. Furthermore, it would be completely impractical to include all submissions as they were submitted in the report itself – in the case of this report is would add nearly 4,000 pages to the report. All submissions are held in the planning office and are available at the public counter for anyone to view. The submissions are also scanned and placed on the website as soon as practicable after the CE report issues.

At all times the elected representatives have had access to all submissions, and this occurs at all stages of plan making, including the pre draft submission.

Plan process and timing

It would not have been possible to prepare this LAP at the same time as the County Development Plan. The planning system in Ireland involves 'nested' planning where plans at lower levels comply with plans above – this plan could not therefore have been commenced until the full content of the Wicklow County Development Plan had been adopted. As soon as the County Development Plan was adopted in October 2016, the review process for this LAP commenced, with the draft plan being published in mid 2017.

It is refuted that the timeline results in the plan process not being 'joined up' – the Wicklow County Development Plan and the Bray MD LAP are not plans at the same level in the plan hierarchy and the LAP must follow the County Development Plan. The submitter who raised this issue may be under the misapprehension that this LAP is still a 'development plan' on parity with the County Development Plan, which was indeed the case in the past, but since the local government reforms of 2014, this is no longer the case.

The plan has been prepared in accordance with the requirements of the Act and the various guidelines relating to LAPs. In accordance with the Act,

20.—(1) A planning authority shall take whatever steps it considers necessary to consult the Minister and the public before preparing, amending or revoking a local area plan including consultations with any local residents, public sector agencies, non-governmental agencies, local community groups and commercial and business interests within the area.

In this regard, the Planning Authority undertook the following forms of public engagement:

Pre-draft

- preparation of the 'Issue Booklet' which was circulated widely (Council offices, libraries, community groups, elected reps etc) providing information about the forthcoming plan review and the plan process
- adverts published in local media, websites, Facebook etc inviting submissions
- contact made with all elected representatives and the community groups through the PPN
- notification issued to prescribe bodies
- public meetings held in Bray (it should be noted that all community groups were advised that they would be facilitated with a one-to-one sessions with their group if desired)
- regular workshops with the local elected members of the Municipal District council. It should be noted that all submissions made at the pre-draft stage were made available to members to view at any time.

Draft plan

- plan published and distributed to all Council offices, libraries
- adverts published din local media, websites, Facebook etc inviting submissions
- contact made with all elected representatives and the community groups through the PPN
- notification issued to prescribed bodies
- public meetings held in Bray

In light of the number of submissions received (2,958) it appears that the publicity campaign has been particularly successful.

In terms of the next stages, should any material amendments be proposed to the draft plan, the Planning Authority would intend to undertake the same format of public consultation. The alternative format of consultation suggested is noted and this, along with many other formats, have been used in the past. It has been the experience in Wicklow that informal 'information days', where members of the public can discuss ideas directly with a member of the planning team, and not in front of a group or roomful of people, is the most conducive to eliciting genuine opinions and engagement from the public.

With respect to Kilruddery specifically, the 'Issue Booklet' published clearly set out that there was a shortage of zoned land in Bray and additional lands would have to be considered for new zoning. The booklet particularly drew attention to the idea of zoning additional land at Kilruddery and therefore it was clearly in the public domain that this was an option being considered.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.23, as detailed in Part II of this report (p52)

(c) : COMPLIANCE

Sub No.	Issues raised
C33 C. Burrell	With respect to Kilruddery, the submitter believes it is not necessary to zone these lands for residential use unless it can be clearly shown in a detailed way as to how this development can be justified as an 'edge of town' development under the Guidelines for Planning & Regional Authorities, in relation to sustainable development and with the objectives set out in this draft Bray LAP, particularly in relation to the new Planning & Development Planning Bill which proposed that local authorities draw up development plans that are evidence based, with a requirement to show what sections will be developed first, what plans are provided for public transport, water and sewerage as well as the provision of schools and other community.
C118 A. Ffrench	<p>1. Compliance with European and Irish Policies and Guidelines</p> <p>(a) Compliance with International Policies</p> <p>The Charter of European Sustainable Cities and Towns Towards Sustainability otherwise known as the Aalborg Charter is an urban environment sustainability initiative approved by the participants at the first European Conference on Sustainable Cities & Towns in Aalborg, Denmark. It is inspired by the Rio Earth Summit's Local Agenda 21 plan, and was developed to contribute to the European Union's Environmental Action Programme, 'Towards Sustainability'.</p> <p>(b) Compliance with State guidance</p> <p>Government Planning Guidelines: Under Section 28 of the Planning & Development Act 2000, planning authorities are legally required to have due regard those guidelines, and furthermore to make those guidelines available for inspection by members of the public; in accordance with the following sub-sections of the Act:</p> <p><i>"28.—(1) The Minister may, at any time, issue guidelines to planning authorities regarding any of their functions under this Act and planning authorities shall have regard to those guidelines in the performance of their functions.</i></p>

(6) A planning authority shall make available for inspection by members of the public any guidelines issued to it under this section."

There are 2 such Planning Guidelines that are directly relevance to Local Area Plans, and to the preparation of the Draft LAP for Bray Municipal District:

- 1) *Local Area Plans - **Guidelines for Planning Authorities*** and the accompanying Manual for Local Area Plans (June 2013)
- 2) *Sustainable Residential Development in Urban Areas (Cities, Towns, Villages) 2009.*

Of the 2 documents, the first is most relevant. Echoing 'Putting People First', both the Guidelines and Manual frequently and pointedly emphasises the vital need for not just consultation, but authentic public participation, e.g. see Guidelines' *"Introduction Key Messages"*

"These guidelines disseminate best practice on local area plans. Local area plans are intended to provide more detailed planning policies for areas that are expected to experience significant development and change, through proper public participation and democratic oversight. Local area plans must focus on delivering quality outcomes for local communities informed by effective participation by those communities in preparing the local plan and the wider planning policy context."

It is unclear whether WCC has given due regard, to the Guidelines. The Draft LAP fails to state where, in drafting the Plan, WCC sought to apply the principles and practices set out in the Guidelines and Manual. In some respects, it is evident that the Plan was not prepared with due regard to either document:

The submitter asks that WCC would indicate if – in preparing the Draft Local Development Plan for Bray MD- it considered and gave due regard to either of these guideline documents? And if it did so, how exactly were the guidelines incorporated and adopted in the contents of the Plan, including the maps? Did WCC make any ministerially prescribed Planning Guidelines available to the public at any stage during the preparation of the Draft Plan; and if so, when and where? And if not, why not?

Opinion of Chief Executive

Compliance with the Planning Act, national and international requirements

This LAP has been prepared to be fully in compliance with the provision of the Planning Act with respect to 'evidence based' planning. The zoning provisions contained therein are clearly evidence based, with the population and housing targets clearly detailed and the zoning provisions clearly been shown to match the targets.

The draft plan sets out any particular or unusual infrastructure requirements that are necessary for any major development area proposed.

- all area designated for significant development are already served by the regional and local road network and therefore any new roads required are those 'internal' to the development. Such infrastructure is generally to be provided by the developer and is not strategic in nature and therefore would not need to be identified at this stage of plan making;
- Going hand in hand with the LAP, the NTA in conjunction with the Council, the neighbouring authority and the TII are preparing a transport plan for town and environs, which will set out what public road and transport improvements will be required to serve the existing future planned populations of Bray and environs
- The plan makes detailed provision for community, open space and educational facilities commensurate

with the development level proposed. On foot of another submission, it is recommended that additional information is provided in the plan with regard to educational infrastructure;

- The plan does not set out the water and wastewater requirements for any area, as these are utilities that are within the remit of Irish Water to provide.

On foot of this and other submissions, it is recommended that more details of the 'implementation' programme envisaged is set out.

Given the quantity of EU and national primary and secondary legislation, guidelines and studies, as well as regional and local policies / programmes / that are in place with regard to land use planning, environmental protection etc in general, it would render the plan particularly cumbersome and impenetrable to refer to all such documents. EU and national primary and secondary legislation requires to be complied with – it is not the responsibility of a land-use plan to ensure all such laws are complied with. Development Plans are meant to be strategic documents, and are not intended to be inventories of legislation and guidelines.

Compliance with Ministerial guidelines

It is considered that the draft plan contents and process is compliant with Ministerial guidance. The submitter who raised this issue does not specify exactly how he considers that the plan is non-compliant and therefore it is difficult to give any other response. There is no requirement to state in plan where and how all guidelines, laws, regulations etc have been considered in the plan; to do so would render the plan unreadable with cross referencing and indexing.

With respect to the availability of Ministerial guidelines, such guidelines are available in the Planning Department in Wicklow County Council and a link to same is provided on the Council's website.

Chief Executive's Recommendation

Amend the draft plan as follows:

1. Amendment No.23, as detailed in Part II of this report (p52)

(d) : MAPS & DOCUMENTS

Sub No.	Issues raised
<p>C118 A. ffrench</p>	<p>Scoping and Mapping – MD Area and Urban Settlements: The Draft Plan's approach to mapping of the Bray MD area and the resultant maps are confusing and not in accordance with best practice , revealing spatial and policy anomalies between county area, Greystones-Delgany conurbation and the lack of inclusion of land parcels formerly in the Bray Environs Development Plan 2011-2017, e.g. southern and western portions of Bray Head, of Kilruddery estate, demesne (Little Sugar Loaf); and the SW portion of the SCR/Woodies retail park and Brennanstown Riding School lands. This makes for confusing and difficult interpretation and lack of integration of planning zonings and objectives, failing to facilitate integrated delivery of sustainable development. For example the Kilruddery estate and demesne is split between Bray MD, Bray Environs and Wicklow County plans; no unified 'picture' or plans is available. Is this deliberate?</p> <p>Suggestions: Extend redline scoping of Draft Plan to include full Municipal District covering all human settlements and adjoining areas. Prepare and Publish large format (A0 sheets), small scale (1:5,000) scaled maps of the Bray Towns/Environs and Kilmacanogue/Little Sugar Loaf/Rocky Valley and Enniskerry settlements and Fassaroe/Ballyman (Old Conna) and contiguous areas</p>

Quality and Content of Documentation - Technical Issues

Maps not to scale in any case (current Bray Town Development Plan's Land Use Zoning Map is designed and published to a stated scale, 1:14,000). For comparison with best practice, see Dlr CDP 2016-22 - 14 no. maps at 1:5,000, with overall 'parent', reference map at 1:20,000. Inset maps in statement not legible or to scale Lack of integrative approach to mapping – ref. CFRAMs and Zoning Maps.

Suggestions: Can be simply resolved by publishing easily legible and navigable maps, adopting Best Professional Practices in draughtsmanship and planning; Ensure clarity of graphic symbols, representation and cross-referencing; simplify texts, legends and colour code; Green Infrastructure Map – produce and publish at smaller scale of 1:5,000 relate to Dlr cross-boundary aspects (e.g. Green Corridors).

Opinion of Chief Executive

- This plan relates to the entire Bray MD area. The maps are very clear in this regard (see Map No. 1). The boundaries of the settlements within the MD are clearly outlined also.
- All previous plan boundaries are irrelevant and will be superseded when this plan is adopted.
- Previously the plan did not relate to MD boundaries as they did not exist legally at the time and therefore there was flexibility in the decision as to the extent of the land covered by the previous Bray Environs LAP.
- Greystones - Delgany is located in the Greystones MD area. None of this area is included in this Bray MD plan. There is no anomaly.
- The southern and western portion of Bray Head, the southern part of the Kilruddery estate, and parts of the Little Sugarloaf are not in the Bray MD area and is therefore not included in this plan.
- The Woodies retail park is in the MD area and is zoned for 'retail warehousing' – it is not clear what discrepancy is being raised here. It is noted that the lands to the west of this retail park, including a small part Brennanstown Riding school lands, are in the MD but are not proposed to be zoned and are therefore not included in the 'red line' boundary of the Bray town and environ zoning element of the plan. These lands were previous included in the boundary of the Bray environs LAP (zoned GB greenbelt). This is proposed to be changed to 'unzoned'.
- There is no lack of consistency or 'integration' of zoning – this plan does not require to be consistent with any previous plan superseded - this is a new plan and all zonings are applied and described in the most up to date terms, in accordance with the Wicklow County Development Plan and new zoning 'codes' provided by the Department of Planning.
- The Kilruddery estate is not 'split' between the Bray MD plan and the Bray environs plan – the Bray MD plan supersedes the Bray environs plan. The Bray MD LAP is subsidiary to the Wicklow County Development Plan and therefore is no known or suggested inconsistency between the two. Land outside of identified town zoning plans is deemed 'unzoned'; rural development policies apply.
- All maps are available at any printed size on request. It is found that the majority of users look at maps now online, where excellent zoom tools are available. Wicklow County Council is currently working on a new interactive viewer (similar to a 'Google Maps' format) which will allow for much easier viewing of zoning, objectives etc and this will be functional this year.
- All maps are to scale and on any future maps, the scale will be more clearly stated.
- The 'insert' maps in the ext document are intended to be representative only and are not meant to be used to scale distances or areas;
- It is not considered appropriate to include DLR objectives maps on WCC maps as these are subject to ongoing change and review outside of the control of WCC. In the event that 'metropolitan Area Plans' come about as suggested in the draft NPF, this issue of cross boundary planning and consistency , will be addressed.

Chief Executive's Recommendation

No change

(e): BOUNDARY ISSUES

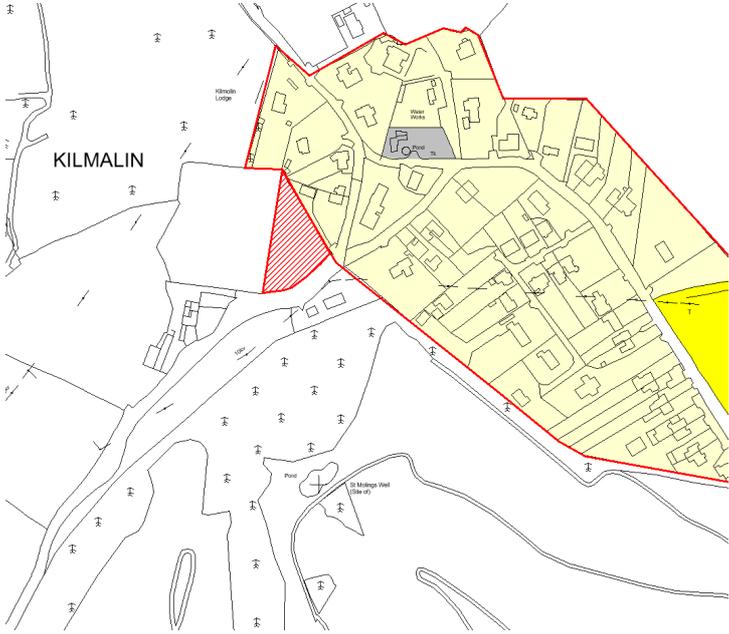
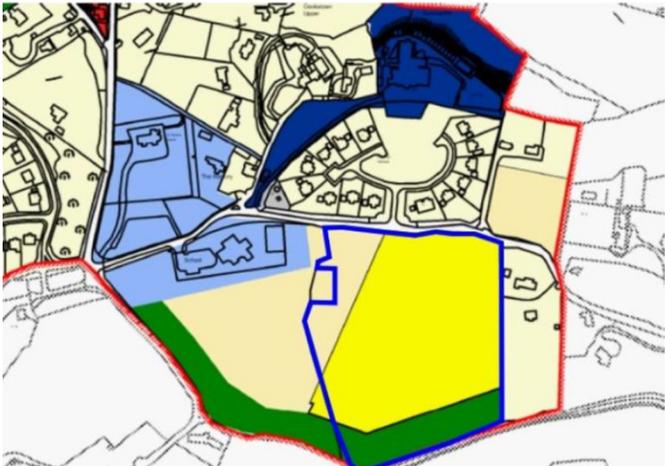
Sub No.	Issues raised
C8 Ballywaltrim & Wingfield Residents Association	It is suggested that the boundary of Bray should be extended to the Wilton roundabout.
C18 Bray & District Chamber of Commerce	The Chamber does not accept the statement that ' Bray cannot grow to the north or north west due to the County boundary ' as clearly the county boundary can be altered as has happened with other towns and cities or by agreement with the adjacent local authority. Already a significant part of the town of Bray is located the Dun Laoghaire Rathdown Local Authority area.
C118 A.ffrench	There is little evidence in the draft or elsewhere of collaboration or it fails to take a joint approach between Wicklow Co. Council and its neighbour to the north, Dún Laoghaire-Rathdown County Council. This is unfortunate, as it seems to ignore some obvious opportunities for joined-up approach that would advance sustainable, holistic planning in the north Leinster sub-region of the GDA (Greater Dublin Region), particularly with regard to Blue-Green Infrastructure, Coastal Zone Management, Climate Change Adaptation, Transport and Biodiversity. There is legal provision for cross-boundary collaboration within the Planning and Development Act, 2002.
Opinion of Chief Executive	
<p>It is not within the remit of a LAP to address County boundary changes.</p> <p>Wicklow County Council planning officials work closely and convene regularly with the colleagues in DLR planning department and in fact are working directly with them, the Transport Dept of DLR and the NTA, TII of the current Bray & Environs Transport Study. In the formulation and crafting of zoning and transport objectives in particular there is considerable collaboration and consultation between the two councils.</p> <p>The majority of issues that have cross-boundary implications are addressed nonetheless in the regional plan. In the event that 'Metropolitan Area Plans' come about as suggested in the draft NPF, this issue of cross boundary planning amend consistency, will be addressed.</p>	
Chief Executive's Recommendation	
No change	

SECTION 3.20 ENNISKERRY

This section of the report deals with the submissions that have been made with respect to Enniskerry

No.	Name	Issues raised
C13	Bluetone Properties Ltd	<p>This submission related to lands located at Kilgarron Hill, Enniskerry at Action Area 2 – Parknasilloge.</p> <p>1. The Draft LAP sets out a number of specific policies and objectives for the development of Action Area 2 which the submitter generally welcomes. However, there are certain objectives which restrict the overall development potential of the lands (the unit numbers, density, and phasing of Action Area 2 and the specific housing policies restricting the residential unit size) which should be revised in the publication of the final Local Area Plan.</p> <p>2. It is requested that the following amendments be considered for inclusion within Enniskerry Action Area 2: Parknasilloge:</p> <p>(a) The unit number be increased from 156 no. units to a maximum of 176 no units on the 8.8ha site to allow for a higher and more appropriate density on the site; As part of the preparation of the Wicklow County Development Plan 2016-2022, Action Area 2: Parknasilloge was increased by 1ha from 7.8 hectares to 8.8 hectares as part of the proposed amendment stage. However, the maximum number of units on site remained at 156 no. which did not reflect the increase in available residential zoned lands. This results in a density of 17 no. units per hectare, compared to 20 no. units per hectare previously. In accordance with the Sustainable Development Guidelines for Residential Development in Urban Areas 2009, it is states that for outer suburban / green field sites <i>"the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally"</i>. The Guidelines continue to state that <i>"development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares"</i>. In light of recent planning policy provision such as Rebuilding Ireland and the new Strategic Housing Process which emphasises consistency with National Section 28 Guidelines, it is considered that the proposed density of 17 no. units per hectare is significantly below the recommended provision for such greenfield lands. It is respectfully submitted that the density should be increased to allow for 20 no. units per hectare, therefore increasing the maximum number of units on site to 176 no.</p> <p>(b) The phasing strategy be amended to remove the restriction in the phasing of housing delivery linked to delivery of employment. It is considered that this restriction in the phasing of housing delivery linked to delivery of employment is detrimental to the development potential of the lands due to the lack of demand for additional employment opportunities without a critical mass in the area being established. It is essential that ancillary facilities such as employment uses have the necessary services and population in place prior to the development of such uses in order to present a viable case for provision of an employment centre at this location. In this regard it is considered that the delivery of the total residential units should not be hindered by a requirement for the development of the employment lands which should be brought forward at such time where considered necessary to enhance the</p>

		<p>overall development of the area. As such it is respectfully submitted that the provisions of Action Area 2 be amended to remove reference to the phasing of the employment lands and amend the following: <i>"The development shall be delivered in phases such that adequate education, community and employment facilities are provided for each phase; in particular, the school site shall be provided in Phase 1 accompanied by no more than 50% of the residential development and the employment facilities shall be provided no later than Phase 2 accompanied by no more than an additional 75% of the residential units"</i>.</p> <p>(c) The amendment of Enniskerry Specific Housing Objective R7 to enable appropriate sized units with regard to the stated densities. It is respectfully requested that the specific housing objective R7 be amended to omit the restriction of no more than 50% of the units shall be 3 no. bed units and no more than 125 sq.m. Restricting the provision of 3 no. bed units and the size of units to no more than 125 sq.m., based on the current density of 17 no. units per hectare will result in the provision of large plot sizes with small units at a very low density on the subject site and for development within Enniskerry. It is considered that this form of development is unsustainable and inconsistent with the national policy to provide increased densities on appropriately zoned lands and should be omitted in this instance in the context of the relatively low densities for Enniskerry.</p>
<p>C31</p>	<p>Bridgedale Homes Ltd</p>	<p>This submission relates to SLO at Kilgarron lands zoned 'special residential' and 'open space' located at Kilgarron, Enniskerry.</p> <p>It is requested that the following amendments be considered for inclusion within Enniskerry SLO at Kilgarron:</p> <p>The current criterion for SLO at Kilgarron is very restrictive for a residentially zoned site of 0.7ha. The town centre type density at 40 units per hectare, results in a target density of 28 units. It is considered that 28 units is not a feasible target on this site without the inclusion of apartment blocks. The submitter does not feel that apartment style units are appropriate for the site due to the topography of the land, combined with the restriction on ridge heights and the overlooking impact that would likely affect the existing bungalows to the north. To avoid any privacy issues while complying with the ridge height restrictions, it is suggested that a mix of housing units could be developed on site to maximise development potential. Bungalow houses backing onto the northern site boundary would reduce the possibility of overlooking, two storey houses could be located to the eastern and southern boundary while adhering to the ridge height restriction. It is considered that 3 storey units could not be placed on the site as they would exceed the specified ridge height and therefore it is not possible to meet the required density of 40 units per hectare. Furthermore, public open space requirements, as outlined in the Wicklow County Development Plan 2016-2022 indicate that public open space will be required at a rate of 15% of the site area. At this rate, 15% of the residentially zoned land would equate to 0.1050ha which leaves a maximum 0.5950ha of available land to develop residential units and associated services.</p> <p>The site is currently zoned as 'Special Residential' which aims to facilitate for the <i>"provision of high quality new residential environments with excellent layout and design, reflecting the density and character of the surrounding area"</i>. The surrounding residential areas are mainly comprised of single storey terraced and detached two storey units. There are no apartment blocks within the vicinity and it is not considered that the erection of a high-density housing development at this site would reflect the developments within the surrounding area. Ultimately, a lower density than currently</p>

		<p>stated in SLO2 will reflect the density and character of the surrounding area and will improve the quality of development.</p> <p>It is requested to amend the SLO at Kilgarron as follows; A maximum of 0.7ha of the area may be developed for residential use. The site shall be developed at 'town centre' type densities (i.e. 40 units/ha max) and shall generally comprise terraces and courtyards of dwellings, as opposed to detached format housing; commercial development is not permitted within the area. The site shall be developed to facilitate for the provision of high quality new residential environments with excellent layout and design, reflecting the density and character of the surrounding area; commercial development is not permitted within the area.</p>
<p>C36</p>	<p>James Byrne</p>	<p>The submitter is the owner of lands at Kilmolin/Kilmalin in Enniskerry. They are seeking for their lands, in hatched red on the map below (measured 0.31 ha), to be included in the Bray MD LAP and zoned for residential accommodation for members of the submitters family. It will not be for sale or for speculative purposes.</p>  <p>The map shows the Kilmolin/Kilmalin area with a red hatched site of 0.31 ha. The area is labeled 'KILMALIN' and includes 'Kilmolin Lodge' and 'St. Malgus Street Library'.</p>
<p>C44</p>	<p>Cairn Homes PLC</p>	<p>Cairn Homes PLC are the owners of lands within Action Area 3 – Cookstown (blue outline in map below). The majority of these lands are zoned new residential R20 (20 units per hectare).</p>  <p>The map shows Action Area 3 – Cookstown with a blue outlined site. The area is zoned for new residential R20 (20 units per hectare).</p>

Population figures

It is requested that, to ensure a robust plan, that the Council update these figures to reflect the latest census information. Based on the CSO's figures the population of Enniskerry has increased by 4.8% between 2011 and 2016, while there has only been a 3.4% growth in housing numbers. This indicates housing numbers in the town are failing to match population growth in Enniskerry.

In relation to the Draft LAP figures it is unclear what geographical area was used in the calculation of the population and housing targets. The census figures do not appear to be based on the Enniskerry Electoral Division or the CSO's legal definition of Enniskerry town. It is therefore not possible for the public to comment on the accuracy of any of the figures in the Draft LAP.

Cairn Homes PLC have commissioned independent research to identify areas of potential housing demand. Coupled with the CSO's population projections, census information, and housing vacancy rates to estimate housing requirements in urban areas across the country. In the case of Enniskerry, it has been predicted there will be a shortfall of housing provision of between 77 units (assuming a low growth scenario in line with the CSO's low growth projections) and 116 units (assuming a high growth scenario in line with the CSO's high growth projections) relative to population growth between 2017 and 2025. The exercise did not take account of "pent-up" demand, which as the Council are aware is a significant legacy issue. The shortfall of residential units in Enniskerry is therefore likely to be significantly higher, and the new plan must legislate for this.

It is the responsibility of the Council to provide adequate zoned land in appropriate areas to accommodate residential development. Whilst the submitter acknowledges that the Enniskerry LAP was recently reviewed as part of the CDP review process, this was done without the benefit of up to date CSO figures. In addition, the housing crisis has intensified and the demand for houses increased exponentially. Given Enniskerry's location in the GDA convenient to Dublin City the submitter believes the Council have a responsibility to make more efficient use of serviced zoned land within the development limit of Enniskerry. The making of the new LAP offers an opportunity to review the Core Strategy figures and produce a potentially more reliable plan for Enniskerry up to 2023.

Density

Zoning and density are intrinsically linked. Densities in Enniskerry vary between 10 and 40 units per hectare but the predominant density guide equates to 20 units per hectare. Cairn feel that the densities promoted in the Draft LAP do not comply with national guidance and do not make efficient use of zoned and serviced land located within the metropolitan area of the Greater Dublin Area. Enniskerry is within the Metropolitan Area of Dublin.

The "*Sustainable Residential Development in Urban Areas*" Guidelines, May 2009 provide guidance at a national level on appropriate densities in towns, villages and urban areas. Most residential zoned land in Enniskerry is restricted to low density levels of less than 20 units per hectare. The Guidelines state in Section 6.12, that "*no more than 20% of the total planned housing stock in small towns and villages should be at this lowest density level*". The quantum of residentially zoned land at very low densities in Enniskerry far exceeds this 20% threshold. The Draft LAP therefore would appear to be in breach of national guidance in relation to the recommended densities for sites in small towns and

villages. In line with the Guidelines, densities in the range of 20 – 35 units per hectare are recommended on 'Edge of Centre' residential zoned land in a small towns or villages, such as Enniskerry. Due to the proximity of the Cairn land to the town centre, approximately a 10 minute walk, a slightly higher density of 20 – 35 units per hectare can be successfully accommodated while respecting the character of the town and area. The Council are requested to re-consider the densities proposed in the Draft LAP and to apply a more sustainable and flexible density range, in line with the *"Sustainable Residential Development in Urban Areas"* Guidelines. It is possible to achieve more efficient and sustainable densities yet retain a low- density character to a development. This can be achieved by quality urban design, the design of public open space and bespoke house designs.

Action Area 3 – Cookstown

In general, Cairn supports the above objectives and is committed to assisting in their delivery where possible. However, Cairn would have concerns about the cap of 105 units on the site overall as it is considered that more efficient use of this zoned land can be achieved through high quality design and construction.

Cairn does not propose to develop excessive amounts of terrace or duplex units to achieve these higher densities. Instead Cairn believes that higher density parameters will allow them to deliver a broader range of unit types within the site but respect the character of the area. Delivering smaller units where the cap of 105 units is retained will result in a larger number of large homes on large plots which is considered to be an inefficient use of the site. Whilst an element of larger units is desirable by Cairn, it is requested that the cap of 105 units is removed entirely and development controlled by more conventional and well-established development control standards that are successfully applied elsewhere in Wicklow.

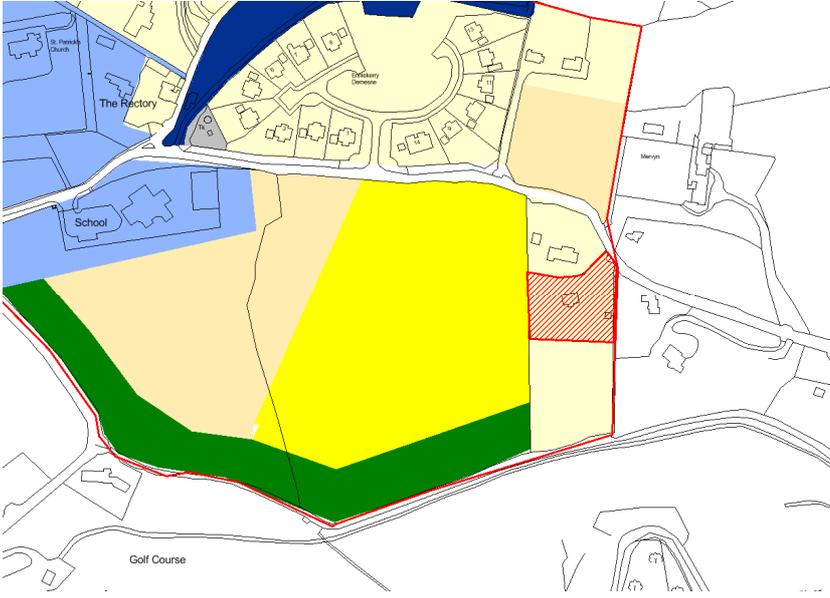
Objectives R6 and R7

Cairn is generally supportive of the policies and objectives of the Draft LAP however they have concerns in relation to policies R6 and R7. It is recognised that Wicklow County Council are seeking to ensure a mix of tenures, design, and house type and whilst Cairn support such aims it is felt that this can be achieved in a less prescriptive way. In their experience, the same result can be achieved through more flexible policies which allow for innovative design and ensure developments reflect local housing need.

Cairn request that R6 and R7 are amended with the following:

R6: - ~~The maximum size of any single 'housing estate' shall be 60 units and developments that include more than 60 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes.~~ **Ensure that an appropriate mix of housing types and sizes is provided in each residential development over 60 units.**

R7: - ~~A full range of unit sizes, including smaller 1 and 2 bedroomed units shall be provided in all new housing areas. No more than 50% of the units in any development shall exceed 3 bedrooms or 125sqm in size.~~ **Ensure that a wide variety of adaptable housing types, sizes and tenures are provided to support a variety of household types.**

C106	James & Aisling Driver	The 2 sets of submitters are residents in Parcnasillogue in Enniskerry and have looked at the new Proposed Draft Area Plan for 2016-2022 (2023-2028) and are satisfied with what is being proposed at present.
C107	Niall & Cindy Driver	
C116	Alex Endrizzi	<p>The submitter raises a number of points with the following in relation to Enniskerry.</p> <ol style="list-style-type: none"> 1. The aim of the plan should be to provide housing for those who work or wish to work in Bray, Enniskerry and Kilmacanogue, rather than those who wish to commute out of those areas into Dublin. 2. Retail units should be strictly limited to the Bray town centre area (Main Street).It seems unnecessary and unreasonable to have convenience shops and larger shopping centres in Enniskerry and Kilmacanogue.The draft plan appears to allow for improved routes between Enniskerry and Bray, this may defeat the purpose of having more retail units in Enniskerry. 3. Allowing for office units in Enniskerry should be removed from the plan. Enniskerry being a smaller settlement, and there being office space in Bray, and the two areas being only 5 km apart, it seems unreasonable to allow for office space here, which would alter the identity of Enniskerry. An allowance could be made for small industrial units, perhaps to encourage local businesses, such as breweries (brewing now being a growing industry in this country).
C131	Sylvia Geraghty	<p>The submitter is the owner of c.0.45ha of land at Cookstown. They are seeking for their land to be re-zoned from Existing Residential (RE) to New Residential (R20) as part of Action Area 2.</p>  <p>It is put forward that the lands are within the settlement boundary, they are zoned RE, the existing AA2 is adjacent their lands, there is no probability of flooding and there are no heritage issues here.</p>
C190	Gerard McGlinchey	The submitter is the owner of 1.7 hectares of land at Brookville, Ballyman Road, Enniskerry. It is located within the village boundary of Enniskerry on mains sewer and water (marked in green to follow).



It is requested that the 0.2 hectares area be considered for residential zoning in the Bray Municipal District Plan.

<p>C218</p>	<p>Pat & Sheila Nolan</p>	<p>The submitters put forward that while the plan appears to be sensitive to Enniskerry's particular history, heritage and natural environment, it would not appear to realise the impact that over 400 additional housing units would have on traffic, noise and congestion in what is actually the small throughway of the village itself. The existing village residents are often forgotten in discussions on tourism, trade traffic, etc.</p> <p>The submitters particularly wish to put forward observations on the proposed idea of the development of 2.5ha off Kilgarron Hill (SLO2) set for 28 potential units of housing which it is believed to be unsuitable for purpose both visually and practically..</p> <p>Protect the green bowl of the village</p> <p>It is hugely important to preserve the surrounding green backdrop (the bowl) of the village untouched. This is as much a part of the village structure as the built environment within it. The Action Area lands is exactly in this backdrop category and can be seen from many angles, especially approaching on the Dublin road – the first view that many have of the village itself. Any two-storey structures in this position would be visible and would partially obscure this backdrop.</p> <p>Protection of the skyline/backdrop</p> <p>The building lines and heights of the houses built on this site will inevitable be visible from many angles/positions and would overlook and destroy the privacy and the ambient light of many houses nearby, especially the cottages and houses directly below which are included in the Area of Architectural Conservation and in so doing, affect their traditional setting. The additional new street lighting that would inevitably accompany any new housing development would be obtrusive and discordant on the village character.</p> <p>Access to proposed site</p> <p>The narrow and hidden entryway to the proposed rezoned site which does not allow cars to enter or exit simultaneously – which is also so close to a busy junction –would be dangerous and totally unsuitable. Cars at this point increasing speed to ascend Kilgarron Hill, would add to the danger. As many residents use this area of the hill to park the entryway visibility would be poor.</p> <p>Drainage and water run-off</p> <p>Over the years there have been drainage problems with run-off water from this site which has caused flooding/ damage to the houses below. Construction interference could significantly add to this problem.</p>
--------------------	-------------------------------	---

Finally it would be a sad loss for all of those in Enniskerry and County Wicklow to see Enniskerry subsumed into the expanding suburbs of Dublin. A proactive green belt barrier of fields should be left around Enniskerry to prevent 'merge'. The pressure for housing and development so close to a large city is appreciated but Enniskerry should not be destroyed in achieving this development.

Opinion of Chief Executive

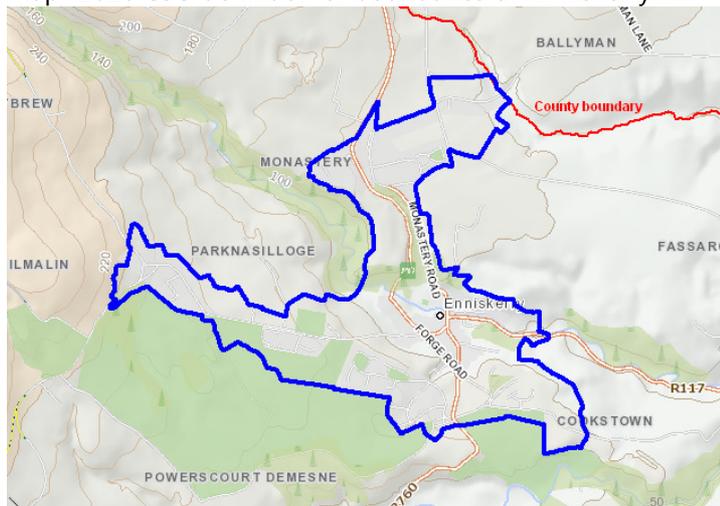
Population figures

With regard to the population figures and housing allocations, in 2012-2013, a time consuming and detailed exercise was carried out by Wicklow County Council to determine the actual 2011 population and housing stock within the then plan boundary. Since the publication of the draft LAP, the CSO have released their SAPS data for the 2016 census. With regard to the 2016 figure, the CSO states the following: *'80 legal towns were abolished under the Local Government Reform Act 2014. Census towns which previously combined legal towns and their environs have been newly defined using the standard census town criteria (with the 100 metres proximity rule). For some towns the impact of this has been to lose area and population, compared with previous computations'*.

Population of Enniskerry 'town', 2006, 2011 and 2016

	2006	2011	2016
Enniskerry town ³²	1881	1811	1889

Map- 2016 CSO definition of boundaries of 'Enniskerry'



It is recommended to incorporate the 2016 population figures into the draft LAP. In accordance with these updated figures, the Census population of Enniskerry in 2016 was 1,889, with a housing stock of 640 units. In accordance with the 2025 population and housing targets for Enniskerry set out in the Core Strategy of the Wicklow CDP, the housing growth target for 2025 is 472 units (from this 2016 base). It should be noted that prior to incorporation of the updated the 2016 figures i.e. using the 2011 based figures, the housing growth target was 470 units. Their use of the updated figures has not resulted in a requirement to make any significant changes to the zoning provisions of the Enniskerry plan.

Zoning

This draft plan has provided for the zoning of land up to 2025, with an additional 470 units (Recommendation No. 1 increases this to 472 units). Hence new zoned land is required in Enniskerry. The zonings of the draft plan are consistent with the County Development Plan Core Strategy. It is important to note that:

- The population target for Enniskerry must be consistent with the CDP and RPG and there is no scope for

³² 'Town' as defined by the CSO

deviation from this,

- Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities),
- Enough land has been zoned in the plan to meet the target for the lifetime of the plan,
- In accordance with the guidelines from the DoE (Core Strategy guidelines) the most appropriate lands have been selected for development.
- The zoning of additional lands at Kilmalin and Brookville (Ballyman Road) from rural/outside the plan area to 'Residential' within the plan area is not warranted. The existing RE zonings along Ballyman Road and at Kilmalin are for the most part confined to existing properties and some small areas of undeveloped land with road frontage between properties (which might be suitable for small infill development). No lands such beyond the existing built envelope of the settlement are zoned for new development in an effort to prevent the spread of Enniskerry. In this regard, the proposed zonings would undermine this objective. The proposal at Ballyman Rd is backland development, with no indication of how it would be accessed. The proposal at Kilmalin is for the family of presumably a person outside the boundary of the settlement, and they would more than likely qualify for housing under the rural housing policies of the County Development Plan. Any development proposed on such sites will be considered in line with the rural development objectives of the County Development Plan at the development management stage to ensure the proper development of the area. Therefore no change is recommended.
- The request to change the zoning of lands to the west of Action Area 3 from RE to R20 for inclusion within the adjoining Action Area is not considered necessary. This site has an existing dwelling on site therefore the RE zoning is appropriate.

Specific Local Objective (SLO) at Kilgarron hill

- It is noted that the owners of the site welcome the proposed zoning; however they are seeking the objectives and requirements be less specific with regard to the amount of density of housing units to be developed. The density as set out in the LAP is not prescriptive, the SLO criteria states "*the site shall be developed at 'town centre' type densities (i.e. 40 units/ha max) and shall generally comprise terraces and courtyards of dwellings, as opposed to detached format housing*". The provision of apartments here is not set out in the objective for the development of this SLO. Having regard to the location of these AA2 lands in the town centre, it is a proper planning proposal for a housing development and given the objectives proposed seeking a specific density of dwellings, along with other design objectives it would be considered to be a positive development for the area. The concerns in relation to the provision of 15% of the site for open space are noted however it is considered that the 15% open space requirement is necessary to provide adequate amenity for future residents and is not excessive to the degree that it would affect the developability or realisation of the desired density on the site.
- With regard to the potential visual impact of the development of these lands, the residential zoning is confined to the lower parts of the site and it is a requirement that any development proposal shall be accompanied by a Visual Impact Assessment which shall have particular regard to views of the site from the town square and the approach roads to the north of the town and where adverse visual impacts are identified, suitable mitigation measures shall be proposed. The concept of the 'green bowl' around the town centre is noted. There are no objectives included in the draft plan that would alter the settlement's topography or would encourage tree removal, both of which create this 'green bowl effect'.
- With regard to the potential traffic impact from the development of these lands, given the location of the proposed entrance in the town centre area, where traffic speeds are necessary low due to road alignment, on-street parking and sometime congestion, it is considered that an entrance that meets traffic safety criteria could be provided here.
- With regard to drainage issues, it is normal requirement of the planning permission process that any drainage issues are addressed, and if not addressed planning permission could not be granted.

Action Area 2: Parknasilloge

It is noted that the owners of the site welcome the proposed zoning; however they are seeking the amount of housing units to be developed to be increased from 156 to 176 units. Having regard to the core strategy of the Wicklow County Development Plan and the housing target figures (including recommendation No. 1 with the new housing target), the zonings and housing unit allocation for this Action Area is considered appropriate and in line with the core strategy.

In line with proper planning and sustainable development it is important to ensure that the employment lands are developed in tandem with the residential development of this action area. All that is required as a minimum is to carry out site development works for the employment lands. This will facilitate the provision of employment opportunities within the settlement reducing the need for local residents to commute long distances to work. Given the population of Enniskerry and its catchment and the lack of existing employment opportunities in the town, it is not accepted that the development of housing on the site would need to come before employment development in order to ensure the viability of any employment development.

Action Area 3: Cookstown

It is noted that the owners of the site welcome the proposed zoning; however they are seeking the objectives and requirements be less specific with regard to the amount of density of housing units to be developed. Having regard to the location of these AA3 lands on the periphery of the settlement boundary on the edge of Powerscourt Demesne, the quantum and density targeted is considered fitting with the location.

Objectives R6

Given the scale of existing development and the scale of proposed development in Enniskerry and having regard to the existing character of the development in the town along with the environmental designations and landscape in the area it is considered appropriate to retain R6 with *"The maximum size of any single 'housing estate' shall be 60 units and developments that include more than 60 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes"*. This is not considered to be a brake on development, and is purely a design matter.

Objectives R7

There is a preponderance of large detached homes in Enniskerry, with limited supply regularly coming onto the market. There is a severe lack of small and medium sized housing in the town, that would come within the budget of lower and middle income households. In order to address this imbalance, the plan includes the following objective: *"A full range of unit sizes, including smaller 1 and 2-bedroomed units shall be provided in all new housing areas. No more than 50% of the units in any development shall exceed 3 bedrooms or 125sqm in size"*. This provision is considered reasonable based on the particular circumstances in Enniskerry.

Density

The Local Area Plan Guidelines seek a "minimum density of 35 – 50 dwellings per hectare in urban areas of suitable size and population where local circumstances warrant, particularly in high-capacity public transport corridors". Enniskerry has been designated a Level 5 Growth Town in the County Development Plan Core Strategy, it has not been prioritised for major growth or investment. Nor could it be described as being in a "high-capacity public transport corridor". Enniskerry is targeted for more local indigenous growth. The proposed higher densities in the centre, densities of 20 units / hectare on lands next to the centre and low densities on the periphery of the settlement are all considered appropriate and in line with sequential planning and proper planning principles.

Greenbelt

'The need to maintain the rural greenbelt between towns' is a key written 'Land Use Zoning Principle' of the draft County Development Plan therefore it is not considered necessary to incorporate a 'greenbelt zoning' around the settlement of Enniskerry.

Retail and employment

It is considered necessary to retain the town centre and employment zonings. There are very few opportunities (sites / buildings) in Enniskerry for employment creation (other than in the town centre), there is high out commuting and it is an objective to increase the jobs ratio by 50% by 2028. This cannot be achieved without the development of new employment sites / buildings. Having regard to Enniskerry's location close to the higher order settlement of Bray, it is unlikely that the town can act as an attractor for large scale employers and therefore it is a strategy for Enniskerry to provide for enhanced opportunities for the creation of new, small scale enterprises. The Town Centre is a key employment asset and the development of existing tourism and retail. No greenfield land has been zoned for town centre development. The Town Centre of Enniskerry performs an important role in serving the settlement for retail and services provision and it is not envisaged or planned for the town centre to be an attractor for any large scale retail development. The County Retail Strategy as set out in the County Development Plan 2016 has designated Enniskerry Town centre as a level 4 'Small Town Local Centre' *"providing for the day to day shopping and service needs of the local population. Small towns should be the main service centre in the rural area, providing a range of facilities, shops and services, at a scale appropriate to the needs and size of their catchment."*

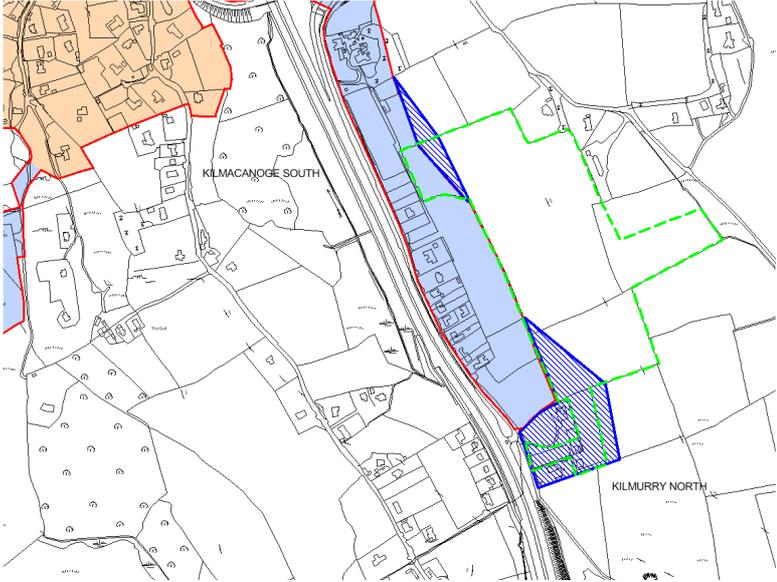
Chief Executive's Recommendation

No change

SECTION 3.21 KILMACANOGUE

This section of the report deals with the general submissions that have been made with respect to Kilmacanogue. Any submission that raised the issues of the rezoning of the lands to the northeast of the village, the proposed road (Objective R08), proposed Greenway (Objective R09) and seeking a SAAO order are dealt with under Sections 3.3 and 3.5.

No.	Name	Issues raised
C73	Ben Crowley	<p>Lack of Public transport and services for young people</p> <p>The submitter has grown up in the village and traveled by car to school each day. They are considering attending college in Dublin in the future, however the lack of public transport in the area is of concern to him. The bus services are unreliable. In addition, there are no places for young people to go in the village outside of the GAA club.</p> <p>Retaining The Rural Village</p> <p>As a small village, Kilmacanogue punches above its weight in relation to the natural beauty. The Little Sugarloaf and the Great Sugarloaf attract many local walkers, but more importantly they attract walkers, cyclists, horse riders and tourists from further afield with thousands of people from Dublin and the surrounding areas walking the hills on a regular basis to enjoy the natural flora and fauna. It is vital that this amenity is kept for future generations to enjoy and that the wildlife, views and landscape are preserved. It's easy to take the short-term view however we as villagers have to live with the long-term regrets and to be accountable to those visitors for the destruction of our village and these delicate amenities. Kilmacanogue should be developed into a 'green' village by infilling with houses where possible around the village before ever looking to carve up the mountainside. Development, if any, should be slow and considered. Create a centre where we can come together as a village with some village services, not a collection of houses. This should be the priority.</p> <p>The plan states: <i>The town of Kilmacanogue is spread out, with no real definition in terms of a town core and over the years the N11 has come to dominate the town.</i> Please do not compound the issues by randomly expanding the village creating further division with no centre. The planned rezoning contradicts the statement; <i>..to encourage the development commercial and community development in the core, particularly that which can contribute towards creating a more defined 'town centre' and town streetscape; and to allow for the development of housing on infill, rather than out of centre, sites.</i> Destroying an area of outstanding natural beauty is not the way forward.</p> <p>Any given evening there are wild deer on the hill, pine martens hiding in trees, pheasants roaming freely and other wildlife around that contribute to the beauty and uniqueness of the area. Development pushes this wildlife further afield. All development impacts wildlife and we need to consider them and the local flora when making any decisions. A study is needed to be undertaken to protect the unique trees that exist in the village on the grounds of Avoca Handweavers and beyond. There are trees there that are the best specimens in the world. These are worth preserving. The plan states: <i>The area of land covering Bray Head and the Great and Little Sugarloaf mountainous region surrounding the towns of Bray and Kilmacanogue is designated an 'area of</i></p>

		<p><i>outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. How can that beauty be maintained if we start development however small the scale. It always develops – look at the destruction of Kiltiernan as a case in point. It's now a place of granite walls blocking landscapes that were open. Our village is heading that way.</i></p> <p>Doing the Right Thing</p> <p>You have the chance to do the right thing now for the long-term sustainability of the area and it is incumbent on the Council to listen to the wishes of the people, particularly the local people, in relation to this. There are Councillors who will vote on this proposal who are not familiar with the area which is a great shame. They are invited to familiarise themselves with Kilmacanogue before taking that vote that will ultimately impact generations to come. Ultimately, the submitter would like the proposed rezoning not to go ahead and for the plan to make more of the potential in the area for the development of a centre for the village and a tourist area for visitors and locals alike. We must preserve the amenity for future generations.</p>
<p>C101</p>	<p>Denis Doyle</p>	<p>The submitter is the owner of land at Kilmacanogue (outlined in the green line). He is seeking for 3.25ha of his lands to be zoned for Tertiary Development (outlined in blue hatching)</p>  <p>The following reasons are set out:</p> <ul style="list-style-type: none"> ▪ There is an existing vehicular access road available to the lands ▪ The lands can be readily serviced by existing utilities/services ▪ This would bookend the development as there is only agricultural land to the south of the land in question.
<p>C122</p>	<p>John Flynn</p>	<p>This submission is in relation to Kilmacanogue Local Area Plan, requesting that the council do not zone Greenfield land in the environs of Kilmacanogue until it is in public ownership. The last major rezoning for residential land in Kilmacanogue was the lands at Rocky Valley crescent. A group of business people sat on this land for years until it was ready for development and sold it for 26 million. Consequently not a single local person was able to purchase a house in the development.</p>

		<p>What should have happened here is that that land should have been purchased by the council prior to any rezoning and any windfall from rezoning should go back to the council. This also allows for better planning of land use and provides funds for spending in the community. All that happened here is that a land speculator became very rich at the expense of young people trying to house themselves.</p> <p>There needs to be joined up thinking going forward between the various council departments. The 20 houses proposed for Rockfield Park are a drop in the ocean in terms of the demand for housing in the near future.</p> <p>In practical terms, if the Councils proposed rezoning of the land at the bottom of the little Sugarloaf goes ahead this bestows a financial windfall for whoever owns this land when they sell it off to developers. What will happen then? Houses are built that local people cannot afford to buy just like Rocky Valley Crescent.</p> <p>It is time for council executive and elected representatives to show leadership.</p> <ul style="list-style-type: none"> ▪ Either the council purchases this land now (unzoned) and only then zones this land and then either directly or indirectly allows for the orderly development of appropriate affordable public and private houses and community facilities (not 3000sq foot mansions like Rocky Valley Crescent) ▪ Or if council insist on zoning the land only that really robust conditions attach to who should be allowed to purchase these houses i.e. genuine local people with a housing need. If the local only condition is robust enough this should dampen the value of the land and make the houses affordable. A weak condition such as people living or working the county for a year will not be sufficient to prevent the squeezing out of locals. ▪ Another alternative is to do as they do in France. The local town mayor controls the land on the edge of towns / villages and sells off individual serviced sites to locals when they need them. It is not unusual to see a mini housing estate built over a twenty year period in an orderly manner under this system. This is done in France to avoid the pressure for one off housing in the countryside which is not sustainable. Another advantage of this system is that it provides an opportunity for young people with initiative to house themselves at a much cheaper cost by utilising their own talents and skills in building the house. <p>All above potential actions are perfectly lawful once acting in the 'common good'. It is time for the council executive and public representatives to step up to the plate and take concrete measures to allow local people to continue to live in their local area.</p>
<p>C210</p>	<p>Raymond & Etain Murphy</p>	<p>Village centre</p> <p>Local residents are yearning for the village heart that they feel was taken from them, when the N11 sliced Kilmacanogue into two sections. What's gone is gone, but we must make sure that anything done in the future tries to repair or at least mitigate the damage done at that time. There is now no 'heart' to the village. There are no local shops - the only places in the village to buy a newspaper, milk or bread are the two service stations. The Post Office was closed down recently – the only place in Kilmac to see posters about local events. Now, over 1000 people have to drive to Greystones or Bray to buy a stamp to post a letter.</p> <p>The obvious place for a village centre is the area around the 1916 memorial garden. We propose that a few local shops and possibly a community centre could be built here and land vacant at present here, such as the field between the west end of the bridge and the memorial garden, should be earmarked <i>for this purpose only</i>. The village also</p>

		<p>needs its Post Office to be reinstated.</p> <p>Tree Preservation Orders Ireland, with the Netherlands, at 11%, are the two least forested countries in Europe, so anything we can do to protect our remaining trees is crucial.</p> <p>Anyone who knows Kilmacanogue knows that it lies in a wooded valley, and that there are wonderful trees everywhere – the ones that particularly spring to mind are those at Avoca Handweavers, those around the church, those along the road to Kilmurray Cottages and the group of Scots Pines on the Little Sugar Loaf side that you see as you drive across the motorway bridge. Now if we look at the Kilmacanogue Settlement Plan, only one tree is identified as having a preservation order on it. It stands in the area KM1, where it is proposed to build 25 new houses.</p> <p>There is a leaflet available at Avoca Handweavers (attached to submission) which tells the history of the original house on the site, Glencormac House, and its gardens. The leaflet lists the rare specimen trees there, among which is a Monterey Cypress, <i>the only mature specimen in the world of this tree</i>, and which has been described as ‘one of the outstanding trees of the British Isles’. The Eucalyptus Dalrympleana is <i>the largest recorded in the British Isles</i>. There is <i>an ancient avenue of 13 Yew trees – 12 are estimated to be about 800 years old and the 13th an amazing 2000 years old</i>, thought to be part of an old avenue leading to Hollybrook Abbey, long gone, which may have been a rest house for pilgrims walking to or from Glendalough. Then there are 3 extremely rare pine trees, the pinus palustris, one of which is <i>the tallest in the British Isles</i>. And so it goes on.</p> <p>This is obviously an extraordinary and unique collection of trees and, as such, deserves the highest protection</p> <p>The Little Sugarloaf designation The Little Sugarloaf should be designated as a site of geological and geomorphical interest.</p> <p>The following amendment is sought “to promote Kilmacanogue as the main service base for visitors to the Great Sugarloaf, <i>the Little Sugarloaf</i> and preserve and improve walking routes between the town and the summit of the mountain ” as the Little Sugarloaf is an extremely popular climb.</p> <p>Other Issues The presence of the invasive weed Japanese Knotweed in the environs of Kilmacanogue could impact on the building of houses.</p>
<p>C257</p>	<p>Keith & Maeve Robinson</p>	<p>Growth in Kilmacanogue At present there is limited space for further development in Kilmacanogue. The amount of new housing needs to be clearly quantified with specific regard to the physical and environmental constraints of the area. There are a number of dwellings on the edge of the settlement boundary that are clearly part of the village however they have not been included within the settlement boundary. The plan set out a number of criteria for the zoning of land however there does not appear to be any rationale set out in the draft plan for the new proposed zonings in the draft LAP. The justification for the zoned lands need to be clearly set out.</p>

		<p>The greenfield lands to the north of the 'KM1' lands should be considered for housing.</p> <p>Core The core area of the settlement is a run of traffic, and in order to consolidate the core, the traffic needs to be addressed first. There is a need for a full safety audit of the two petrol stations and if it is found that their locations are not compliant with relevant safety standards they should be required to move to another location along the N11.</p>
<p>Opinion of Chief Executive</p>		
<p>Lack of public transport The provision of public transport is not within the remit of a Local Area Plan. The 133 Bus Éireann bus and 45A Dublin bus currently serves Kilmacanogue with a regular daily service, the 145 Dublin bus has a very limited service to the village however it is agreed that Kilmacanogue, as a typical small rural village away from a major centre of population, is lacking in good public transport facilities. It is probably unrealistic to assume that high frequency public transport would be rolled out to a location such as Kilmacanogue, even if the population were increased. The NTA is however currently undertaking a complete review of the Dublin Bus system, and it is likely to be based around 'hubs' where one can easily connect to different forms of transport or different bus routes / destinations. It is likely that the hub for this area would be Bray and therefore what is key for Kilmacanogue's connectivity is its connectivity to Bray</p> <p>Lack of services for young people While the submitter's view that there is a lack of facilities for young people in Kilmacanogue is noted, the Council is committed, through the actions of the Community, Cultural and Social Development Department of the Council to improving community facilities through the County. In particular, it utilises the 'Community Facilities Hierarchy' adopted by the Council which sets out broadly the range of facilities that should be available in each settlement according to its size. Kilmacanogue is a village of less than 2,000 people and in accordance with the hierarchy, such a settlement would be expected to be served by a community / parish hall, open spaces / play areas, playing pitches and an outdoor multi use games area. Such facilities are available in Kilmacanogue, but this does it imply that more cannot be done to improve community infrastructure in the area.</p> <p>The Community, Cultural and Social Development Department of the Council is working hard to address community and youth infrastructure needs as they are identified, and to source funding to make improvements. The role of this land use plan is to support this work, for example, by ensuring the correct objectives and land zoning provisions (if required) are in place.</p> <p>Village Centre The plan acknowledges that Kilmacanogue's village centre is lacking definition and a focus. The Primary Development Area zoning aims to address this, where should any planning application be submitted within this primary area, the objective is to <i>"create a consolidated and vibrant mixed use settlement centre that is the focal point for the delivery of the retail, commercial, community and activity needs of the local population and its hinterland, and to promote this area for tourist uses and for residential use, with an animated and high quality streetscape, whilst ensuring the protection of the special character and heritage of this area."</i></p> <p>Additional zoning impact on wildlife Kilmacanogue's designation as a Level 9 Rural Cluster acknowledges that the settlement is a built up area within the open countryside. All of County Wicklow's countryside has an abundance of natural wildlife and habitats; hence the County Development Plan has numerous objectives to ensure their conservation. There are too many to reference individually however Chapter 10 'Heritage' ensures that all habitats and wildlife are considered in all planning applications with the Vision of the County Development Plan seeking <i>"to protect and enhance the diversity of the county's natural and built heritage"</i>.</p>		

Land zoning requests

The submission seeking the 'rezoning' of lands for inclusion within the Settlement Plan, would essentially allow for additional housing, employment or other forms of development. It is considered that the analysis that was carried out in formulating the settlement plan and specifically in determining the quantum of land that is required for Kilmacanogue to develop in the future is consistent with the Core Strategy and therefore there is no requirement for any additional lands to be zoned for additional housing in the settlement. The specific zoning request (No. C101) it is considered that to accede to this request would result in the unacceptable sprawl of the village further into its surrounding countryside, a considerable distance south of the village core. It would also entail development above the 100m contour, which has been utilised as the maximum extent of development in this area. The proposal is therefore not supported.

With regard to the provision of new employment lands, it is considered that there would be sufficient opportunities to provide for the required number of future jobs in Kilmacanogue on the lands already designated in the primary and secondary zones. There are also a number of existing retail, retail services and tourism related developments in the settlement, as well as offices and commercial units in the local business park that could accommodate future job growth. The proximity of Kilmacanogue to Bray should also be noted, which is designated a Metropolitan Consolidation Settlement by the Regional Planning Authority, where various employment opportunities exist.

Protection of Trees

The trees identified at Avoca Handweavers are already subject to a TPO (No.2 of the CDP Trees at Avoca Handweavers, Glencormick South, Kilmacanogue). It is acknowledged that there are other trees in Kilmacanogue that are worthy of protection in some cases and it is considered that the following objectives of the County Development Plan seeks the protection of such tree's, NH18 *"To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments"*.

The Planning Act does not allow for a Tree Preservation Order to be made through the local area plan process as Section 205 of the Planning Act has its own separate process. It is recommended that a review of the TPO list is undertaken post adoption of this LAP, perhaps in conjunction with the planned review of the RPS.

County Geological Sites

In 2014, the Council in partnership with the Irish Geological Heritage Programme of the Geological Survey of Ireland, assessed the geological heritage of Wicklow and identified the most important sites which are worthy of protection as County Geological Sites . The Council will seek to maintain and where possible enhance the geological heritage values of these sites. There are 62 sites on the list with the Great Sugarloaf included, while the Little Sugar Loaf was not included and there are no plans to update this list or to include the Little Sugar Loaf.

Referencing the Little Sugarloaf

It is not considered necessary to reference Kilmacanogue as the main service base for visitors to the Little Sugarloaf. Section 7.3 on 'Bray Head & Great and Little Sugarloaf Mountains' of the plan sets out proposals for both the 'Great and Little Sugarloaf Mountains'. The Great Sugarloaf is the main attraction between the two hence its emphasis in the objective *"To promote Kilmacanogue as the main service base for visitors to the Great Sugarloaf and preserve and improve walking routes between the town and the summit of the mountain."* In addition to this Objective T29 of the County Development Plan seeks *"To support the development of new and existing walking, cycling and driving routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties. In particular, to encourage and facilitate - the development of a new walking route from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way"*.

Japanese Knotweed

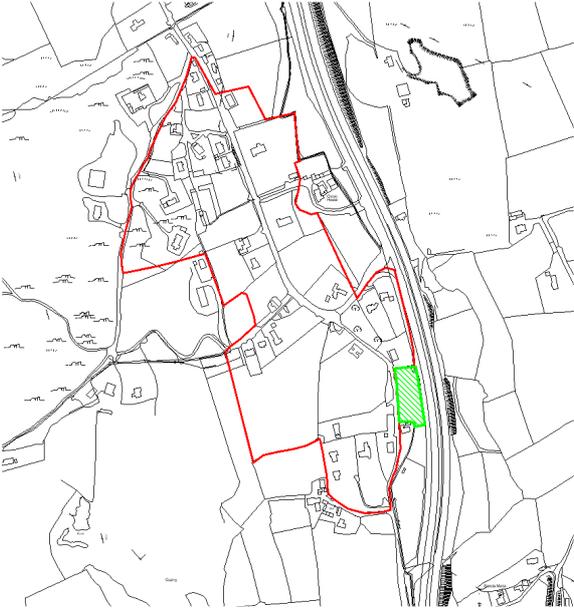
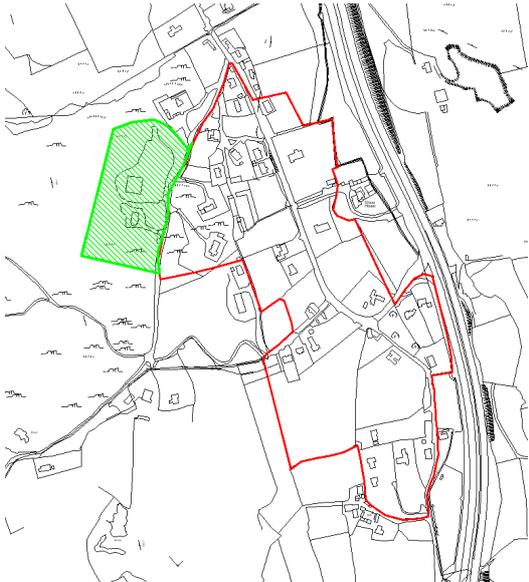
The presence of Japanese Knotweed is not a matter for the Local Area Plan. This is a matter to be dealt with by landowners in accordance with the law.

Chief Executive's Recommendation

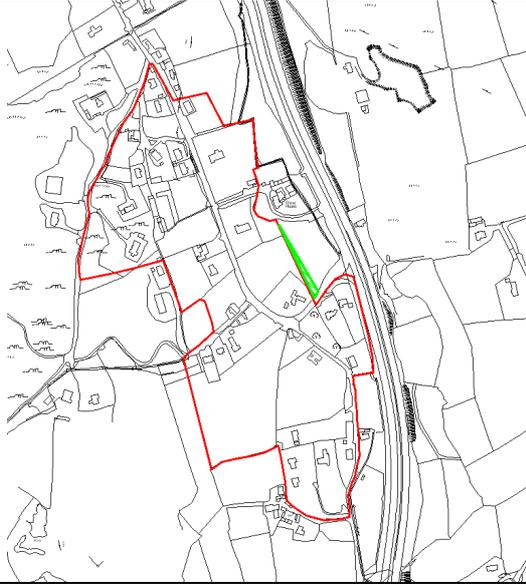
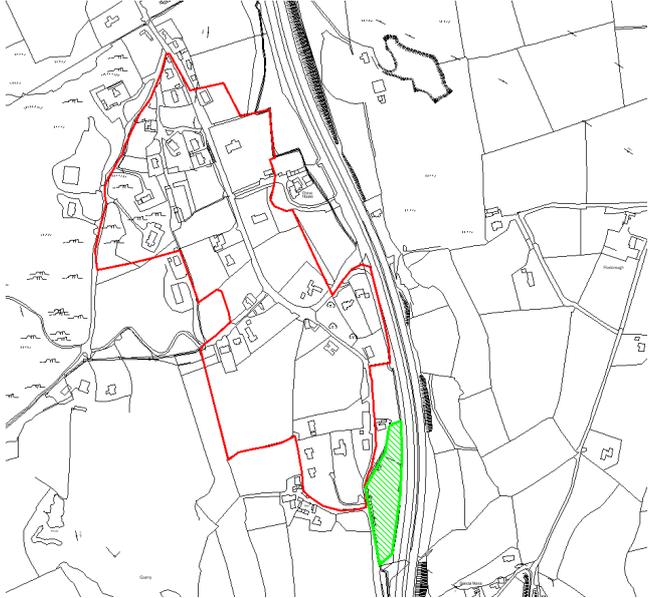
No change

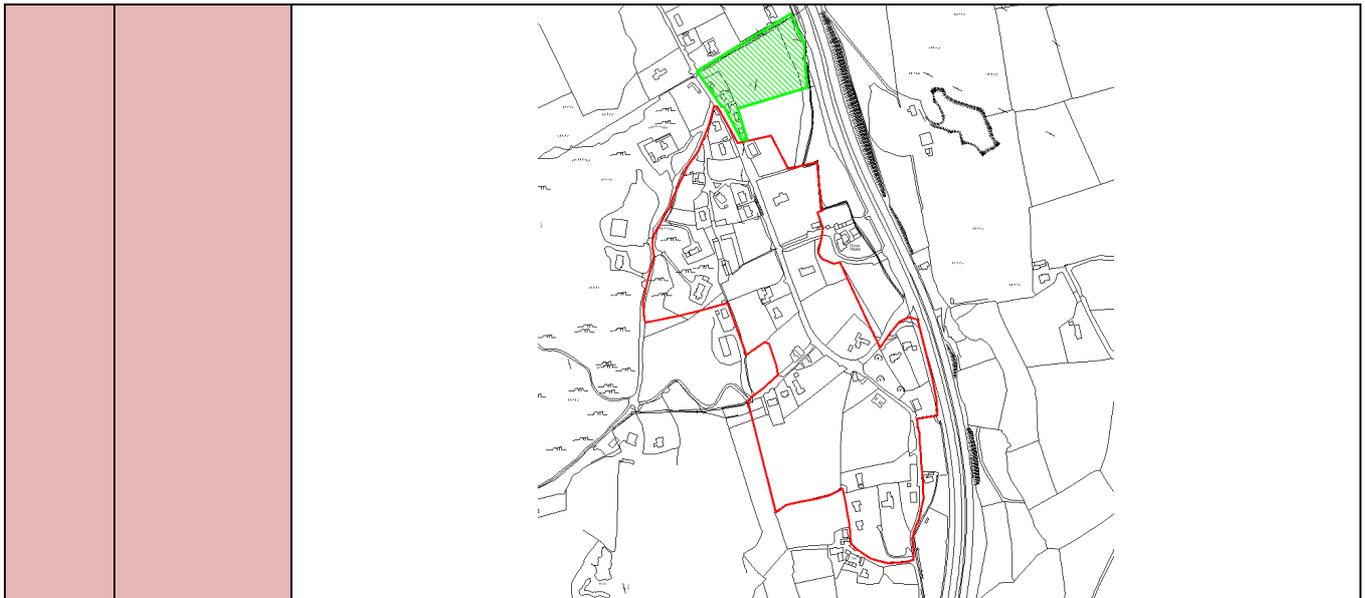
SECTION 3.22 KILMURRAY

This section of the report deals with the submissions that have been made with respect to Kilmurray.

No.	Name	Issues raised
C94	John Donnelly	<p>This submission is seeking the inclusion of the following lands to be within the boundary of Kilmurray.</p> 
C103	Draper Family	<p>This submission is being made on behalf of the owners of lands at Kilmurray encompassing the family's concrete products yard and commercial buildings and his own house and that of his son. The Subject Lands are outside the Rural Cluster of Kilmurray (Kilmacanogue).</p>  <p>Part of the Subject Lands were designated in the County Development Plan 2010-2016 as an area 'restricted to the development of one dwelling only' within the Settlement</p>

		<p>Boundary. This hatched designation referred to Richard Draper's dwelling and Robert Draper's dwelling (granted under Planning Reference: No. 12/6054).</p> <p>The draft Bray Plan 2017 proposes to remove the Settlement Boundary around the Subject Lands, and the existing designation (which is no longer applicable). Removing the Settlement Boundary from around the Subject Lands is considered unacceptable by the landowner as there are two existing houses and a long-standing family business operation at this location.</p> <p>There is extensive landscape screening surrounding the existing concrete products yard and commercial buildings which mitigate any views to it from the surrounding area, and there are piped water services in the vicinity of the Subject Lands.</p> <p>A concrete supply business operate here, Sugarloaf Concrete Products Limited on the Subject Lands, and the owners reside in the family homes adjacent to this business which has been operating for over 30 years now, providing building products and is a local employer.</p> <p>It is submitted that the Subject Lands should be within the Settlement Boundary of the Rural Cluster of Kilmurray (Kilmac) and the existing concrete products yard and commercial buildings be designated for Employment Uses - Light Industrial & Warehousing in the upcoming Bray Municipal District Local Area Plan 2017-2023.</p>
C122	John Flynn	<p>The minor rezoning of land at Kilmurry resulted with land owner purchasing the land without a zoning and paid a non zoned price he then sold off the rezoned land with windfall profits. These windfall profits are paid from a millstone around the necks of young families who will be paying off the debt for the next 30 years.</p> <p>What should have happened here is that the land should have been purchased by the council prior to any rezoning and any windfall from rezoning should go back to the council. This also allows for better planning of land use and provides funds for spending in the community. All that happened here is that a land speculator became very rich at the expense of young people trying to house themselves.</p>
C123	John Flynn	<p>This submission is requesting that the council consider a slight revision to the settlement boundary at Kilmurray as shown on map. The eastern boundary seems to be set by a line parallel to the motorway which means the boundary crosses the middle of existing established boundaries. A more sensible boundary would be to follow the line of the existing field divisions which only involves a minor movement of boundary 5m average to the east.</p>

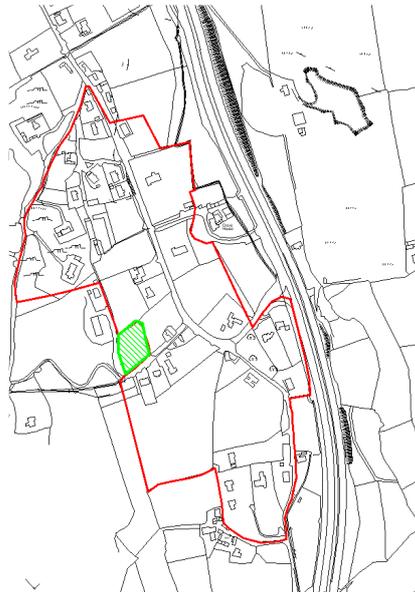
		
<p>C171</p>	<p>Michael Lawlor</p>	<p>This submission is seeking the inclusion of the following lands to be within the boundary of Kilmurray.</p> 
<p>C247</p>	<p>Pamela Prendergast</p>	<p>This submission is seeking the inclusion of the following lands to be within the boundary of Kilmurray.</p>



C248

Paul Prendergast

This submission is seeking the inclusion of the following lands to be within the boundary of Kilmurray.



Opinion of Chief Executive

1. It is not within the remit of a Local Area Plan to address the Council's land acquisition and development policy. This would be a matter for the Housing and Corporate Estate Department and SPC.

2. The Council has no control over the price of lands or dwellings within the cluster. However there are strict criteria for anyone seeking planning permission to build a dwelling within the cluster to ensure that locals are prioritised. In order to build a single house in Kilmurray the following applies:

Applicant / purchaser of any new home must

(a) be a resident for at least 10 years duration in County Wicklow of a settlement / area designated as Level 7-10 in the County settlement hierarchy that is within 10km of the rural cluster in question prior to making of application / purchase of new house.

(b) demonstrate a proven need for housing, for example:

- first time home owners;

- *someone that previously owned a home and is no longer in possession of that home as it had to be disposed following legal separation / divorce, the transfer of a home attached to a farm to a family member or the past sale of a home following emigration.*

3. Boundary extension proposals

The proposals to include the any or all of the subject lands within the settlement boundary of the Level 9 Rural Cluster of Kilmurray is not considered acceptable, for the following reasons:

- 'Rural clusters' are 'unstructured' settlements considered suitable for very limited new rural development.
- The cluster has been designated to accommodate the growth of 6 additional units during the lifetime of the LAP³³. There are adequate lands within the existing boundary to accommodate this growth.
- Designating substantial areas of additional lands undermines the Settlement Strategy which aims to direct new housing into larger established settlements.
- The proposal does not accord with the key housing and zoning principles set out in Chapter 4 of the County Development Plan, including the application of the 'sequential approach' to zoning/designation of new lands whereby 'leapfrogging' to peripheral lands is to be resisted and the need to maintain the rural greenbelt between towns, the north of Kilmurray is in close proximity to the south of Kilmacanogue and it is important to maintain this 'greenbelt' between settlements.
- The proposals are not in accordance with principles of proper planning and sustainable development and it is not recommended.

With regard to submission C103, this site was within the boundary of Kilmurray under the previous County Development Plan 2010-2016 and was restricted to the development of one dwelling only. They are not within the settlement under the current County Development Plan 2016 - 2022. The subject lands (c. 3.25ha/c. 8 acres) were designated within the settlement boundary for the first time in the County Development Plan in 2010 with the condition that development be restricted to one dwelling only. In 2012, the landowner received permission for a dwelling (PRR12/6054). The landowner has received the benefit of the designation. The designation is therefore no longer necessitated. The extension of the boundary on the subject lands is not acceptable. The lands are not required for the future growth and development of the cluster. Furthermore, the lands in question are extremely elevated and exposed to views on the slope of the Great Sugarloaf and any development here would further impact on the scenic amenity of the area.

4. Employment zoning

The proposal to zone the lands for 'Employment uses – Light industrial and Warehousing' is not recommended. Lands within rural clusters are not zoned. Rural clusters are 'unstructured' settlements considered suitable for very limited new rural development with the main purpose of the designation being to direct rural generated housing into clusters rather than the open countryside. The proposed zoning of lands for employment use within this rural area is not justified under the Core Strategy or the employment hierarchy and is contrary to sustainable planning principles which aim to direct new employment generating development on zoned land into the established towns and villages. The current use is pre-existing and without the benefit of planning permission. To designate this area for wider uses in a remote area served only by narrow lane would not be in accordance with proper planning and sustainable development. The following objectives are included within the County Development Plan, to facilitate the development of appropriate employment generating developments within the rural area. The proposed zoning is not therefore necessitated.

Rural Employment Objectives **RUR1** *"To permit the development of employment generating developments in rural areas, where it is proven that the proposed development requires to be located in a rural area (e.g. dependent on an existing local resource) and will have a positive impact on the location."*

RUR2 *"To permit the development of small-scale commercial / industrial developments in rural areas that are not*

³³ In accordance with Chapter 3 of the Wicklow County Development Plan, indicative growth target for such 'rural clusters' during the six year lifecycle of County Development Plan is in the order of 4 units.

dependent on an existing local resource, subject to compliance with all of the following criteria:

- *The proposed development shall be a small-scale industrial / commercial scheme or service and the number employed shall be appropriate in scale to the location and its characteristics, including proximity to the workforce and customers;*
- *the proposed development shall be located on the site of a redundant farm building / yard or similar agricultural brownfield site; and*
- *the nature and scale of the proposed development and the proposed process or activity to be carried out, shall be appropriate to and compatible with, the character of the rural environment of the site at which the development is proposed, and shall not be detrimental to the rural amenity of the surrounding area. In the assessment of planning applications, cognisance shall be taken of the location of the site vis-à-vis the proximity of the site to the national and regional road network. "*

RUR3 *"To encourage, where appropriate, home-based economic activity³ in rural areas including the provision of small-scale individual enterprises. Proposals which involve the change of use and/or new development for purposes of home-based employment will generally be considered favourably where it can be demonstrated that the nature and scale of the proposed development and the proposed process or activity to be carried out, shall be appropriate to and compatible with the character of the rural environment."*

Chief Executive's Recommendation

No change