

**Leonora Earls**

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**From:** Ciara Gilgunn - (DECLG) [Ciara.Gilgunn@housing.gov.ie]  
**Sent:** 15 September 2017 15:37  
**To:** Planning - Plan Review  
**Subject:** DHPLG Submission on Draft Bray Municipal District LAP 2017  
**Attachments:** DHPLG Submission 15 Sept 2017 Draft Bray MD LAP.pdf; ATT00001.txt; ATT00002.htm

To Whom It May Concern,

Please find attached submission from the Department of Housing, Planning & Local Government on the Draft Bray Municipal District LAP 2017.

I would be very grateful for confirmation of receipt of the attached submission.

Kind Regards

Ciara Gilgunn

Ciara Gilgunn  
Forward Planning Section

Planning & Housing Market Policy and Land Management Division | Department of Housing, Planning and Local Government | Custom House | Dublin 1 | +353 (0) 1 8882418



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



15 September, 2017

Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

**Re: Draft Bray Municipal District Local Area Plan 2017**

A Chara

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

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.

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. 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 *Development Plans Guidelines*, 2007. Appropriate phasing and sequential development policy mechanisms should be provided as necessary.

#### 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.

#### 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 ‘*The Planning System and Flood Risk Management Guidelines*’ (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.

The officials of the Department are available to discuss the matters raised above and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,



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Niall Cussen

Principal Advisor,

Forward Planning Section

**Leònora Earls**

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**From:** Tanya Yeoman [Tanya.Yeoman@nationaltransport.ie]  
**Sent:** 15 September 2017 16:19  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Municipal District Local Area Plan NTA Submission  
**Attachments:** Bray Municipal District Local Area Plan.NTA Submission.pdf

To whom it concerns,

Please find attached the NTA submission to the Draft Bray Municipal District Local Area Plan 2017.

Kind regards,

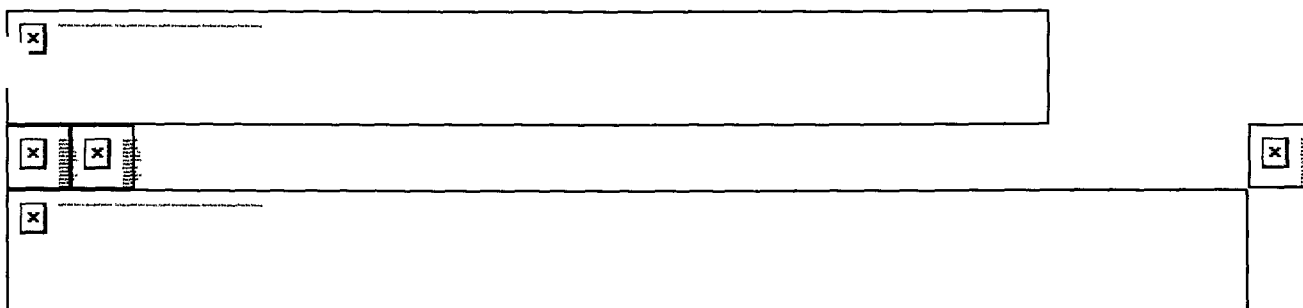
Tanya Yeoman

Land Use & Transport Planner  
Transport Planning and Capital Investment



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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Administrative Officer,  
Planning Department,  
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15<sup>th</sup> September 2017

**RE: Bray Municipal District Local Area Plan**

Dear Sir/Madam,

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.

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.

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.

**1. Development Objectives**

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.

**2. Roads and Transportation**

The NTA recommends the following changes to the text in Section 8.1:

- 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:
  - o "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:
  - o "To improve east-west linkages, particularly by walking, cycling and public transport".

### 3. 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:
  - o "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:
  - o 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;
  - o 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:
  - o 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.

#### 4. 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.

#### 5. 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.

#### 6. 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*.

I trust that the views of the Authority will be taken into account in the finalisation of the Bray Municipal District Local Area Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael MacAree', is positioned above a horizontal line.

**Michael MacAree**

***Head of Planning and Data Analysis***





An Roinn  
Cultúir, Oidhreachta agus Gaeltachta

Department of  
Culture, Heritage and the Gaeltacht

**Our Ref: FP2017/081** (*Please quote in all related correspondence*)

29 August 2017

Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town



By email to [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

**Re: Draft Bray Municipal District Local Area Plan 2017**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

### **Architectural Heritage**

The Architectural Heritage Advisory Unit of this Department recommends the following:

**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).

**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.

### **Nature Conservation**

The nature conservation comments are listed below and it is recommended that the draft documents are amended to take account of these comments.

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.

## **Plan**

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.

Examples of such objectives include:

- 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

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.

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 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 Parknasillogh 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.

## **NIR**

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.

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.

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.

## **SEA**

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.

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.

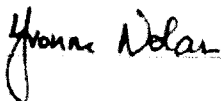
It is stated in the NIR that the specific objectives that could cause adverse impacts on site integrity are CD6, GI5, RO9, RO7, RO4 and RO3. This is not reflected in the SEA assessment in table 19 in section 7.3. For example RO9 is given a neutral rating and the issue of the impact on the biodiversity 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.

The description of Kilmacanogue Marsh pNHA on page 21 appears to be an error as it refers to a site in Co. Wexford.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@ahg.gov.ie](mailto:manager.dau@ahg.gov.ie) (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager  
Development Applications Unit (DAU)  
Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Y35 AP90

Le meas



**Yvonne Nolan,  
Development Applications Unit**

**Bernadette Harvey**

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**From:** Kelly, Veronica [Veronica\_Kelly@education.gov.ie]  
**Sent:** 14 September 2017 17:11  
**To:** Planning - Plan Review  
**Subject:** DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017  
**Attachments:** Sub\_Draft\_Bray\_Municipal\_Dist\_LAP\_2017\_12Sept17.docx

Attached please find the submission of the Department of Education and Skills to the above referenced plan.

Veronica Kelly  
 Forward Planning Section  
 Department of Education and Skills  
 Portlaoise Road  
 Tullamore  
 Co. Offaly  
 R35 Y2N5

h: 057 932 4448  
 Email: Veronica\_Kelly@education.gov.ie

**From:** Catherine McDonald [mailto:CMcDonal@wicklowcoco.ie]  
**Sent:** 01 August 2017 11:47  
**To:** Cregg, Mary <mary\_cregg@education.gov.ie>; Power, Brian <Brian\_Power@education.gov.ie>; Lyons, Fidelma <fidelma\_Lyons@education.gov.ie>  
**Subject:**

**DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017**

Dear Sir or Madam,

Pursuant to Section 20 of the Planning and Development Act 2000 (as amended), please log onto the following link to view the public notice and the draft Bray Municipal District LAP 2017 (Main document, maps and appendices)  
<http://www.wicklow.ie/bray-municipal-district-local-area-plan-2017>

The Draft Bray MD LAP and associated documents will be available to view from 02.08.17 to 15.09.17.

**SUBMISSIONS ARE INVITED** on the plan and associated document. before **15th September 2017 (5pm)**. Submissions may be made by either **Writing to:** Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town or **Emailing to:** [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

A **PUBLIC INFORMATION DAY** will be held in Bray Municipal District Office, on **Wednesday AUGUST 16<sup>TH</sup> 2017** from 14.00PM – 16.00PM and 17.30PM TO 20.00PM where planning staff will be available to assist you in making a submission.

Yours sincerely

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Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow

14 September 2017

**Re: Draft Bray Municipal District Local Area Plan 2017-2023**

Dear Sir/Madam

Thank you for your email of 1 August 2017 in relation to the above. The Department of Education and Skills wishes to make the following submission.

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.

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.

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

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.

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 *circa* 4.57 hectares (12 acres approximately).

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 (extract below in italics). 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.

*Using the projected population targets published in the public consultation booklet (40,000 by 2028) 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 as set out in the public consultation booklet, if this level of population growth was to materialise.*

Strategic Planning Area	2011 Population	2028 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 Municipal District	29,339	40,000	10,661	1,279	47	906
Enniskerry	1,940	2,500	560	67	N/A	N/A
Kilmacanogue	800	950	150	18	N/A	N/A

*The projected population targets referenced in the public consultation booklet provides figures for 2011 and projected target figures for 2028. Five of these 17 years have already elapsed so the additional children will already be attending the existing primary and post-primary schools. However, in relation to the additional educational infrastructure which may arise as a result of such a population increase, the growth of 10,661 would result in the need for an additional 47 classrooms at primary level and 906 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 circa. 4.57 hectares (12 acres approximately). It may be prudent to consider a campus arrangement for these schools and if so a site of approx. 20 acres would be required. It is important therefore that sufficient lands in the areas where significant additional population is likely to arise, is zoned educational, to ensure that educational infrastructure can be put in place to meet the needs of these new communities.*

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.



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

If you have any queries in relation to the above or require any additional information please do not hesitate to contact me.

Yours sincerely

---

Veronica Kelly  
Executive Officer  
Forward Planning Section

Tel. No: 057-9324448

Email: [Veronica\\_Kelly@education.gov.ie](mailto:Veronica_Kelly@education.gov.ie)

## **Appendix 1**

### **Information used to calculate educational infrastructural requirements**

Based on the projected population growth included in the draft Plan, the Department calculates the extent of primary and post primary provision needed in an area to cater for this additional population as follows:

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of post primary school going age.
- At primary level, school accommodation is calculated on the basis of a Pupil Teacher Ratio of 27:1, meaning each individual classroom in a school will have 27 pupils.
- New primary school buildings are generally provided in multiples of 8 classrooms. This is because there are eight individual class groupings between junior infants and 6th class. A 16 classroom school would mean that there are 2 junior infant classes, 2 senior infant classes, with a 24 classroom school having 3 junior infant classes.
- A new primary school ranging in size from 4 - 8 classrooms, as a guide, requires 0.77 hectares (1.9 acres).
- A new school ranging in size from 8 - 16 classrooms, as a guide, requires 1.14 hectares (2.8 acres).
- A new school ranging in size from 16 - 24 classrooms, as a guide, requires 1.6 hectares (4 acres).
- A new school ranging in size from 24 - 32 classrooms, as a guide, requires 2.2 hectares (5.47 acres).
- At post primary level, the Department refers to the size of a building by the number of pupils it will cater for because the number of pupils, together with the curriculum to be delivered (which is school specific), will dictate the range and extent of specialist facilities to be provided.
- Generally, the maximum size of new post-primary school the Department will build, is for 1,000 pupil places.
- 4.57 hectares (12 acres approximately), as a guide, are required for a new 1,000 pupil post primary school.

## Appendix 2

### Site Suitability

This Department has published two documents that provide guidance in relation to site suitability for educational provision. Technical Guidance Document - 025 – Identification and Suitability Assessment of Sites for Primary Schools & Technical Guidance Document - 027 – Identification and Suitability Assessment of Sites for Post Primary Schools. Both of these documents are available, for download, from this Department's website [www.education.ie](http://www.education.ie).

Your attention is also drawn to the Department of Environment, Community and Local Government guidelines titled **"Sustainable Residential Development in Urban Areas"** published in May 2009 which provides that no significant residential development should take place without an assessment on the impact of school provision (refer to Chapter 4: Page 25). Please refer to Department of Environment, Community and Local Government website [www.environ.ie](http://www.environ.ie).

In addition, the Department of Education and Skills draws your attention to the published (July 2008) Code of Practice for Planning Authorities and the provision of schools, in particular Item 2 and the need for consulting with this Department regarding the assessment of specific sites. This document is available on both the Department of Education and Skills and Department of Environment, Community and Local Government websites.

Furthermore, following on from the publication of the Code of Practice in 2008, a Memorandum of Understanding between the Department of Education and Skills and the City & County Managers' Association on the acquisition of sites for school planning purposes is in place. This Memorandum of Understanding is designed to codify practice in relation to cooperation between this Department and local authorities in relation to the acquisition of sites suitable for the construction and development of buildings for educational purposes.

In relation to additional educational needs identified for this plan, subject to the availability of resources and on foot of a formal request to the CEO of your local authority, it would be this Department's intention to request, at the appropriate time, that Wicklow County Council would assist this Department in relation to the identification/acquisition of suitable school sites as required.

The Memorandum of Understanding document is available, for download, from this Department's website [www.education.ie](http://www.education.ie).

### Appendix 3

The Department's current programme of capital investment in schools includes the following projects, which are due to go to construction over the course of the plan.

#### Projects going to construction

<b>6 Year Programme Projects to go to construction 2018</b>			
County	Roll Number	School Name & Address	School Type
Wicklow	N/A	KWETB Bray	Post-Primary
<b>6 Year Programme Projects to go to construction 2019 - 2021</b>			
County	Roll Number	School Name & Address	School Type
Wicklow	61820J	Loreto Secondary School, Bray	Post-Primary

A6



HEALTH AND SAFETY  
AUTHORITY

HSA Head Office, Metropolitan Building, James Joyce Street, Dublin 1  
Telephone: 1890 289 389 Website: <http://www.hsa.ie>

Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town

Our Ref: 97403

14/08/2017

**Re: Draft Bray Municipal District Local Area Plan 2017**

Dear Ms McDonnell,

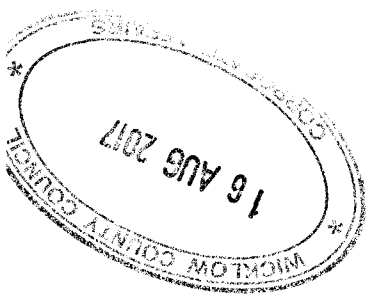
I wish to acknowledge receipt of your correspondence dated 1<sup>st</sup> August 2017, regarding the above which has been noted.

If you have any queries please contact the undersigned.

Yours sincerely

**Tara Horigan**  
**Inspector,**  
**COMAH, Chemical Production & Storage (CCPS)**





**Comhairle Chontae na Mí**

Teach Buvinda, Bóthar Átha Cliath, An Uaimh,  
Contae na Mí, C15 Y291

Fón: 046 – 9097000/Fax: 046 – 9097001

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**Meath County Council**

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Co. Meath, C15 Y291

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Web: [www.meath.ie](http://www.meath.ie) - Registration No. 00172770

**Planning Department.**

**31<sup>st</sup> August, 2017.**


Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

**Re: Draft Bray Municipal District Local Area Plan 2017.**

Dear Sir/Madam,

I refer to the above-mentioned and wish to confirm that Meath County Council, Planning Department have no comment to make in relation to the Draft Bray Municipal District Local Area Plan 2017.

Yours sincerely,

  
Wendy Bagnall,  
Senior Executive Planner.

**Leonora Earls**

---

**From:** McCormack Michael [Michael.McCormack@tii.ie]  
**Sent:** 13 September 2017 14:26  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Municipal District Local Area Plan, 2017 - 2023  
**Attachments:** Draft Bray MD Local Area Plan 2017 - 2023.pdf

Dear Sir/Madam,

Please find attached a copy of the Authority's observations on the Draft Bray Municipal District Local Area Plan, 2017 – 2023.

A hard copy has also issued by post.

Yours sincerely,  
Michael McCormack  
Senior Land Use Planner



Administrative Officer  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow

Dáta | Date  
13 September, 2017

Ár dTag | Our Ref.  
TII17-98599

Bhur dTag | Your Ref.

**Re: Bray Municipal District Draft Local Area Plan, 2017 - 2023**

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes referral of consultation relating to the preparation of the Bray Municipal District Draft Local Area Plan, 2017 – 2023. The Council will be aware that the M11/N11 is of strategic importance nationally and this is reflected in its inclusion within the EU TEN-T comprehensive network. In addition, the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035, outlines a number of specific proposals related to the M11/N11 corridor. Having regard to the extent and location of planned development in the area and the relationship of the proposed Local Area Plan area to the strategic national road network, the Authority submits the following observations for the Councils consideration;

#### **Strategic National Road Network**

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 *'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'*.

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.

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 Council will be aware that TII issued the M11/N11 Corridor Study in April, 2017. The objectives of which are as follows:

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Bonneagar Iompair Éireann  
Ionad Gró Gheata na Páirce  
Sráid Gheata na Páirce  
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Transport Infrastructure Ireland  
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+353 (0)1 646 3601

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.

It is acknowledged that the Draft Local Area Plan references the M11/N11 Corridor Study and indicates in Objective RO2 the commitment to *'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'*.

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.

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 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,
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- 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.

#### **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.

#### **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.

#### **Conclusion**

It is requested that the foregoing comments and observations are considered and addressed by the Council in the adoption of the Local Area Plan or included as proposed amendments prior to adoption.

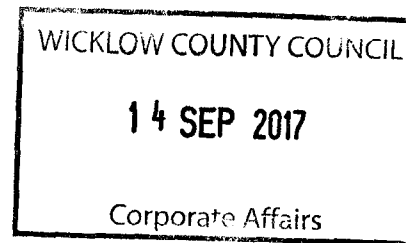
TII as always remains available to assist and support the NTA and Wicklow County Council in developing a sustainable land use and transport based planning framework for the Bray and Environs area of the county as part of potential material amendments to the Draft Bray Municipal District Local Area Plan.

Yours sincerely,



Michael McCormack  
Senior Land Use Planner

Administrative Officer  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow



Dáta | Date  
13 September, 2017

Ár dTag | Our Ref.  
TII17-98599

Bhur dTag | Your Ref.

**Re: Bray Municipal District Draft Local Area Plan, 2017 - 2023**

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Yours sincerely,



Michael McCormack  
Senior Land Use Planner