From:

Brigid O'Brien |

Sent: To: 15 September 2017 15:39 Planning - Plan Review

Subject:

Fwd: Bray local area plan 2017

This submission is from residents of Adelaide Rd. They are:

Philippa Bridge, Cassandraville, Adelaide Rd.
Patricia Doyle, 2 Westview Terrace, Adelaide Rd.
Martina Arthur, 3 Waverley Terrace, Adelaide Rd.
Susan Corbett, Carrigburn, Adelaide Rd.
Les Corbett, Carrigburn, Adelaide Rd.
Jack Corbett, Carrigburn, Adelaide Rd.
Louise Knatchbull, 1 Westview Terrace, Adelaide Rd.
Brigid O'Brien, 7 Westview Terrace, Adelaide Rd.
Aiden Corcoran, 6 Westview Terrace, Adelaide Rd.
Ponie Deveney, 8 Westview Terrace, Adelaide Rd.

Sent from my iPad

Begin forwarded message:

From: Brigid O'Brien < brigidobray@gmail.com >

Date: 14 September 2017 at 23:01:30 IST
To: Brigid O'Brien < brigidobray@gmail.com >
Subject: Fwd: Bray local area plan 2017

Sent from my iPad

Begin forwarded message:

From: Brigid O'Brien < brigidobray@gmail.com>

Date: 14 September 2017 at 22:59:54 IST **To:** Brigid O'Brien < <u>brigidob@gmail.com</u>>

Subject: Bray local area plan 2017

To: Wicklow County Council

Re: Local area plan, Bray.

Regarding traffic on Adelaide Road.

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.

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.

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.

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.

Re: Drainage.

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.

Sent from my iPad

Subnission (or Dray MD)

CJ

Planning Section

Wicklow County Council

Wicklow Town

WICKLOW COUNTY COUNCIL

15 SEP 2017

PLANNING DEPT.

47 Swanbrook

Southern Cross

Bray

Co Wicklow

14th September 2017

Dear Sir/Madam,

I wish to object in the strongest possible manner at the removal of the 30 Metre "Buffer Zone" behind Swanbrook, on the 2017 Local Area Plan for Bray. This was put in place as part of the controversial rezoning of part of Killruddery for High Density Housing and Tourism championed by Councillor John Ryan.

Wicklow Planner Bernadette Harvey has been unable to give any adequate explanation as to why this Buffer zone has been removed and has denied any knowledge of representation by Councillors or anyone else to the Council on this matter.

On Bord Pleaneala appeal 247501 against the unauthorised development carried out at Killruddery Planning Inspector Emer Doyle is of the view that additional planting of trees and hedging on this Buffer Zone should be carried out to reduce the impact of dust, traffic pollution and noise on residential amenity, which is already a serious environmental health issue here.

I am of the view that the removal of the" Buffer Zone" and placing a busy roadway between Swanbrook Estate and Killruddery which will greatly increase dust, noise and traffic pollution is a malicious and vindictive act against the residents of Swanbrook Estate by Planners responsible Sorcha Walsh, Bernadette Harvey and Lisa Rothwell.

I would ask for incoming Chief Executive Frank Curran to investigate these matters and to reinstate the Buffer Zone in full.

Conor Aherne

Yours-sincerg

12th September 2017

Senior Executive Officer Planning Dept. Wicklow Co. Council County Buildings Wicklow Residents Hollybrook Park Southern Cross Rd. Bray Co. Wicklow

RE: SUBMISSION in relation to DRAFT BRAY LAP 2017 - 2023

Dear SEO.

As residents of Bray and the Southern Cross Road we are writing this submission in relation to proposals in the current draft Bray Local Area Draft Plan 2017, in particular the planned zoning of Killruddery Demesne West for new residential and employment.

The new proposed land zoning for Killruddery will cover an area almost **double** the size of the last proposed development in the 2009-15 Bray LAP, **from 7.6 hectares (18 acres) to 12 (29.6 acres),** to accommodate the building of a large residential development of up to **240 houses.**

Killruddery is without question of tremendous benefit for a number of reasons - cultural, heritage, ecological and recreational. As an area of outstanding natural beauty (AONVB), it is a much-valued tourism asset in the County and, as such, the Demesne and surrounding environment, including the slopes of the Little Sugar Loaf, should be fully supported, protected, and maintained by Wicklow County Council and other relevant bodies.

There is undoubtedly a need for private and social housing. However, any development in support of the County's commitments to population targets to help address this crisis must be carried out *in a long-term sustainable manner*, which we do not believe the Draft LAP in its current form will achieve. Indeed, the Bray LAP as it pertains to Killruddery/Little Sugarloaf in particular goes against the broader plan for the town and the county.

Our concerns broadly fall into the following categories, outlined in further detail below:

- The Natural Environment
- Wicklow Heritage
- Flood Risk
- Road Traffic & Public Transport

The Natural Environment

In 2008, the then Minister for Environment - Green Party member John Gormley - made a ministerial order for the Great and Little Sugarloaf Mountains that an area of special amenity be designated for the area. The Special Amenity Area Order (SAAO) was not implemented by Wicklow County Council.

While we are aware that the majority of Wicklow County Councillors voted not to proceed with the order at the time, we strongly believe that both Wicklow County Council and the Department of Environment should proceed with this order. Amongst other things, we believe not doing so fails to comply with the Planning Act 2000 and subsequent amendments to that Act.

If this SAAO were to proceed, in our opinion we would not be facing the prospect of zoning lands on the slopes of what should be a protected area in this, the so-called 'Garden of Ireland', where alternatives should be exhaustively investigated to preserve the uniquely beautiful landscape of the County. To that end, Wicklow County Council should be seeking to contain urban sprawl and not contributing to it via the development of greenfield sites of this size in such environmentally sensitive areas.

Section 7.3 - Bray Head & Great and Little Sugarloaf Mountains in the current Draft LAP notes '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 outstanding natural beauty' in the Wicklow County Development Plan landscape strategy'. The section continues without further elaboration of the need to safeguard the Little Sugarloaf area's own geological heritage or scenic value while noting only additional details pertaining to Bray Head, for example:

'In the Bray Head and Sugarloaf Mountains areas, it is the objective of the Council to: Protect and enhance the character, setting, and natural and geological heritage of Bray Head in order to ensure its existing and future amenity, recreational and scientific value is secured. In recognition of the area's scenic value and vulnerability to development pressure, it is the policy of the Council to implement the 'Special Amenity Area Order' (SAAO) for Bray Head.

We believe this 'lip service' to the Sugarloaf Mountains represents a serious shortcoming in approach and should be addressed in the revised LAP and through the implementation of the previously highlighted Special Amenity Area Order (SAAO).

Section 3.1 – 'Rationale for the Development of the Environs' of the previous Bray LAP 2009-2015 noted that: 'A limited extent of low density development is considered viable on lands within the Killruddery Demesne'. This rationale should still apply, as no changes have occurred in the ensuing period of time.

The designation of the proposed area with substantially increased housing density to accommodate 240 new homes along with a new employment area on the slopes of the Little Sugar Loaf could irreversibly spoil this unique natural amenity, which in turn will impact negatively on the local people and visitors to the area.

By way of alternatives, the Residential Development Strategy for Bray MD of the Draft LAP (p12/13) prioritises the redevelopment of brownfield and derelict sites including infill, high-density development and LOS (living over shop).

A number of such sites that were previously manufacturing and industrial areas situated on the Southern Cross/ Boghall Road have been in decline for some time, are unsightly, and are in dire need of redevelopment and regeneration. These include the Dell Site, the AO Smith site, the Schering Plough site, the Superquinn site, with the addition of other similar sites such as the Florentine town centre site, Heiton Buckley Site.

All of these sites are provisioned for via existing infrastructure, the development of which would avoid development creep on the Little Sugar Loaf and provide a welcome rejuvenation of the Southern Cross Road and surrounding area.

In summary, the Council should seek as far as is possible to ensure all housing targets are met via these existing derelict, brownfield sites, thereby rejuvenating existing derelict lands and local environs and protecting the local natural environment in as coherent and sustainable manner as possible.

Wicklow Heritage

Section AH5 of the Architectural Heritage Objectives in the Draft Municipal District LAP 2017 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Killruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne.

The building of 240 houses and a new employment area within cannot but adversely affect the character of Killruddery's demesne. Moreover, it is difficult to envision how the vehicular access to the new development outlined in the plan - via the existing Killruddery entrance – can assist in preserving the estate's character. Simply reconfiguring the actual entrance gates for the scale of development proposed would be problematic given these gates are included in the list of Record of Protected Structures (Ref. 08-34, OS Map Ref. 08), Appendix 4 of the Wicklow County Development Plan 2016-2022.

Chapter 11 of the Draft Bray LAP, in relation to Special Areas of Conservation (SACs), appears to contravene The Habitats Directive currently outlined in the Draft County Wicklow Heritage Plan 2017-2022.

Rather than developing the environs of Killruddery House and Gardens, the County Council should be seeking to protect the County's Heritage.

Flood Risk

Chapter 2 of the Draft Municipal District LAP 2017 states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. Again the proposed re-zoning of Killruddery lands would be problematic.

Though not identified in the Strategic Flood Risk Assessment 2016-2022, localised flooding is already a problem both on the road through the Killruddery estate where vehicular access to the new housing development is proposed, as well as in the adjacent Hollybrook Park estate itself. Rear gardens in Hollybrook Park, particularly those located near the Swan river, routinely experience waterlogging after heavy rainfall, relating directly to the surface run-off from the Little Sugar Loaf.

The building of 240 houses and an office/industrial area on the slopes of the Little Sugar Loaf would inevitably increase the surface run-off leading to greater flooding to surrounding land and estates, and therefore likely contravene the aforementioned objectives.

Road Traffic

The Draft Plan fails to meaningfully address the traffic issues on the Southern Cross Road or nearby areas, which I believe is a significant flaw in the proposal, particularly in light of the proposed development on Killruddery lands.

Residents of Hollybrook Park and other estates on the Southern Cross Road routinely encounter difficulty accessing the Southern Cross Road during the peak commuting times of 07:30 to 09:30 and 16:30 to 18:30 because of the volume of traffic. For residents of estates on the Bray Business Park side of this commuter road this can pose a very real danger when crossing the line of traffic when travelling in the direction of Bray/Greystones. Furthermore, N11 access during peak times can often be difficult with traffic backed up as far as the Bray Business Park.

Were the Killruddery lands to be developed with up to the proposed 240 residential units, it is not unreasonable to suppose that a potential additional 480 cars or more accessing and using the Southern Cross Road would be introduced on top of the already existing traffic, further impeding access to the N11, local schools and businesses.

If future development were to occur including the use of the existing entrance gates as proposed, increased traffic noise would be introduced, likely impacting the estate itself and a loss of privacy for existing residents who have lived in this area for the past 20 years, to say nothing of the noise impact of the necessary construction phases.

Though any future development of the Superquinn site on the Southern Cross Road would inevitably add congestion to the road, this could at least be mitigated by additional access points to and from the Boghall Road.

As early as March 2000 there is reference to "existing congestion problems" from the Roughnan O'Donovan Consulting Engineers Traffic Impact Report, Ref. 00-114, 3rd March 2000, paragraph 2.1.

The following information from Section 1.4/Study Area of the M11/N11 Corridor Study (April 2017) provides further context to the congestion experienced on the Southern Cross Road:

"it would appear that the N11 between Junction 6 (Fassaroe) and Junction 8 (Kilmacanogue) has for the most part been in service since 1991 (at a minimum). Limited interventions or upgrade has taken place on this section of the N11 since the early 1990s, aside from the construction of Junction 6 (Fassaroe) and Junction 7 (Killarney Road) grade separated interchanges and some minor works"

"Clearly issues, including: mainline capacity; weaving conditions; direct accesses; and sub-standard junction arrangements (Junction 7), are key factors in the congestion and delay experienced at this point of the network."

"In particular, in the AM peak, it is evident that the M11/N11 northbound and southbound flows are operating at or above capacity between Junction 6 (Bray Central) and Junction 7 (Bray South)."

In summary, any further development through zoning Killruddery land on the Southern Cross Road will only impact negatively on existing traffic congestion issues, which the Draft Plan fails to address.

Public Transport

Bray South public transport services do not provide adequate services in the Southern Cross Road area.

Only one limited public (weekday only) and one limited private service exists via the Southern Cross Road utilising the N11/M11, and most Dublin Bus services route via (and stop for a period) at Bray Dart station, all entering via the Dargle bridge or the Killarney Road.

A strategy and implementation of improvements to public transport in Bray and the surrounding areas in advance of any further development through the zoning of lands at Killruddery should be undertaken in parallel. Chapter 8 Infrastructure, Section 8.1.2 Public Transport notes only that 'development plans can put in place the necessary policy framework to encourage and facilitate the improvement of public transport'. Such is the current public transport offering along the Southern Cross Road that any new, sustainable housing development should only commence until such times as a policy framework of this kind was designed and implemented in parallel, and ideally ahead of time, which the Draft LAP provides no assurances around.

As the Draft LAP consequently does not mention detailed measures to address the lack of Public Transport on the Southern Cross road, the objective to develop in a long-term sustainable manner are unlikely to be met were the Draft Plan to be adopted in its current form.

Closing Summary

The Draft LAP outlines the vision for the Bray Municipal District as follows:

"For the Bray Municipal District to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment."

In this context, we believe it is not necessary to zone the Killruddery lands for residential use as proposed unless it can be clearly shown in a detailed manner as to how this development can be justified as an edge of town development, in relation to the unique setting and sustainable development objectives set out in the Wicklow County Development Plan.

We would urge the County Manager, the Planners and the elected members to take these and our fellow residents' concerns into account, to adopt the plan but **not zone** the residential part of the Killruddery proposals.

Yours sincerely,

Richard and Anne Allan Anne M. Logh M.

Richard Ale

100 Hollybrook Park Southern Cross Road

Brav

Co. Wicklow

Vanessa Leonard 123 Hollybrook Park Southern Cross Road

Bray

Co. Wicklow

Manessaleovar

Denise McCormack & Barry Glennon
130 Hollybrook Park
Southern Cross Road
Brav

Across MCCRNCLe

References:

Adopted Bray Environs Plan

Appendix II Non-Technical Summary of the Environmental Report of the Bray Environs LAP 2009-2015

Bray Strategic Environmental Assessment Statement

Bray Town Development Plan 2011-2017

D.T.O. Strategy 'A Platform for Change'

Draft County Wicklow Heritage Plan 2017-2022

M11/N11 Corridor Study Needs Assessment Report April 2017 Broughan & O'Donovan

National Spatial Strategy 2002-2020

NTA Greater Dublin Area Transport Strategy 2016-2025

Regional Planning Guidelines for the Greater Dublin Area, 2010-2022

SEA of the Bray Environs Local Area Plan 2009-2015

Bray Environs Local Area Plan 2009 – 2017 (Extended from 2015)

From:

Sent: To:

Dave Anderson [acro.co.co.]
12 September 2017 22:10
Planning - Plan Review

Subject:

Proposed zoning

Hi,

I would like to submit my objection to the proposed zoning for 240 units on the Kilruddery estate. I would also like the green belt status be reinstated on the fields above and to the east of Deepdales.

्रज्ञात

Best Regards David anderson 6 Deepdales Southern cross road Bray

2 Ashton Wood, Herbert Road, Bray, Co. Wicklow.

10th September 2017

WICKLOW COUNTY COUNCIL
Re:
15 SEP 2017
PLANNING DEPT.

Bray Municipal District Local Area Plan 2017-2023

WICKLOW COUNTY COUNCIL

PLANNING DEPT.

Administrative Officer, The Planning Department,

Wicklow County Council, County Buildings, Wicklow,

Co. Wicklow.

We would like to make the following submissions for consideration as part of the review process of the Draft Bray Municipal District Local Area Plan 2017.

1. Proposal

To include the tree lined section of the Herbert Road as outlined on the attached map in the list of "Tree Preservation Orders" (Schedule 10.08 Draft Bray Municipal District Local Area Plan 2017-Maps and Schedules).

Attachments: Relevant section of Draft Bray Municipal District Local Area Plan 2017, Land Use Zoning Map, Bray Town and Environs Map No. 2.

Rationale/Relevant Information

To preserve and protect the unique character and setting of this tree lined section of the Herbert Road. The Herbert Road was laid out by Sidney Herbert in the late 1850's and constitutes a significant part of the history of Bray Town and local environs. The Herbert Road has a total of 8 Protected Structures listed, of which 3 are located within this section of the road.

This is the last remaining tree lined approach to Bray and we feel that it is important to protect this setting in the interests of local residents and visitors/tourists experience of the Bray area.

We believe that this request is consistent with

- 1. Green Infrastructure Objective GI4 "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" as outlined in Section 9.3. of the Draft Bray Municipal District Local Area Plan 2017.
- 2. Woodland, Trees and Hedgerows Objectives as outlined in Chapter 10, Section 10.3.3 of the Wicklow County Development Plan 2016-2022.
- 3. The Local Green Infrastructure Strategy as outlined in Chapter 10, Section 10.3.6 of the Wicklow County Development Plan 2016-2022, in particular General Green Infrastructure Objectives NH31, NH32, NH33 and NH38.

2. Proposal

To include a definition of the curtilage associated with protected structure Kilbride Hill House (B26 on List of Protected Structures in Draft Bray Municipal District Local Area Plan 2017-Maps and Schedules). We propose that the curtilage is the entire site as outlined on the attached relevant section of Draft Bray Municipal District Local Area Plan 2017, Land Use Zoning Map, Bray Town and Environs Map No. 2.

Attachments: Relevant section of Draft Bray Municipal District Local Area Plan 2017, Land Use Zoning Map, Bray Town and Environs Map No. 2.

Rationale/Relevant Information

Kilbride Hill House is a Protected Structure, which has remained essentially unchanged since its construction in 1870. The house and everything within the curtilage was designed as a single unit and has always functioned as a single dwelling in individual ownership. We feel it is important to preserve the history, heritage, character and integrity of this house and curtilage. The immediate views surrounding the house and the landscape setting of the house contribute significantly to, and are an inherent part, of the character of the house. The National Inventory of Architectural Heritage provides a description of the house and also notes that "The property is set within its own grounds" (Reg. No. 16400701).

It is a building of significant architectural interest. Its importance is further enhanced by its setting amongst impressive mature woodlands which is rarely retained in Bray. A protected structure status includes conservation and preservation objectives to maintain the character of the structure. PDA 2000 s2 defines structure in relation to a protected structure as including 'the land lying within the curtilage......'. Curtilage is defined as '....a piece of ground attached to a dwelling house and forming one enclosure with it or so regarded by the law; the area attached to and containing a dwelling house and its outbuildings' (Oxford English Dictionary).

Recent planning applications relating to this site (Ref Numbers 16905 and 171085) outlining proposed development would result in major alterations to the character, setting and immediate views by creating a new curtilage around the house with huge reduction of land and landscape features, creating a disconnect between the main house and the gate lodge and existing gate entrance, removal of large numbers of the tree/woodland contained within and around the perimeter of the property which defines what we believe to be the current curtilage. The reasons for refusal of application number 16905 included several concerns relating to interference with the setting, privacy and views to and from the protected structure. In reports associated with application 16905 both the Department of Arts, Heritage, Regional and Rural Gaeltacht Affairs and An Taisce raised serious concerns regarding the effects of development on this site from archaeological, architectural and natural biodiversity perspectives.

In order to preserve this example of architectural heritage, including the demesne associated with the structure we believe that is would be beneficial to assess and define the exact curtilage.

We believe that this request is consistent with

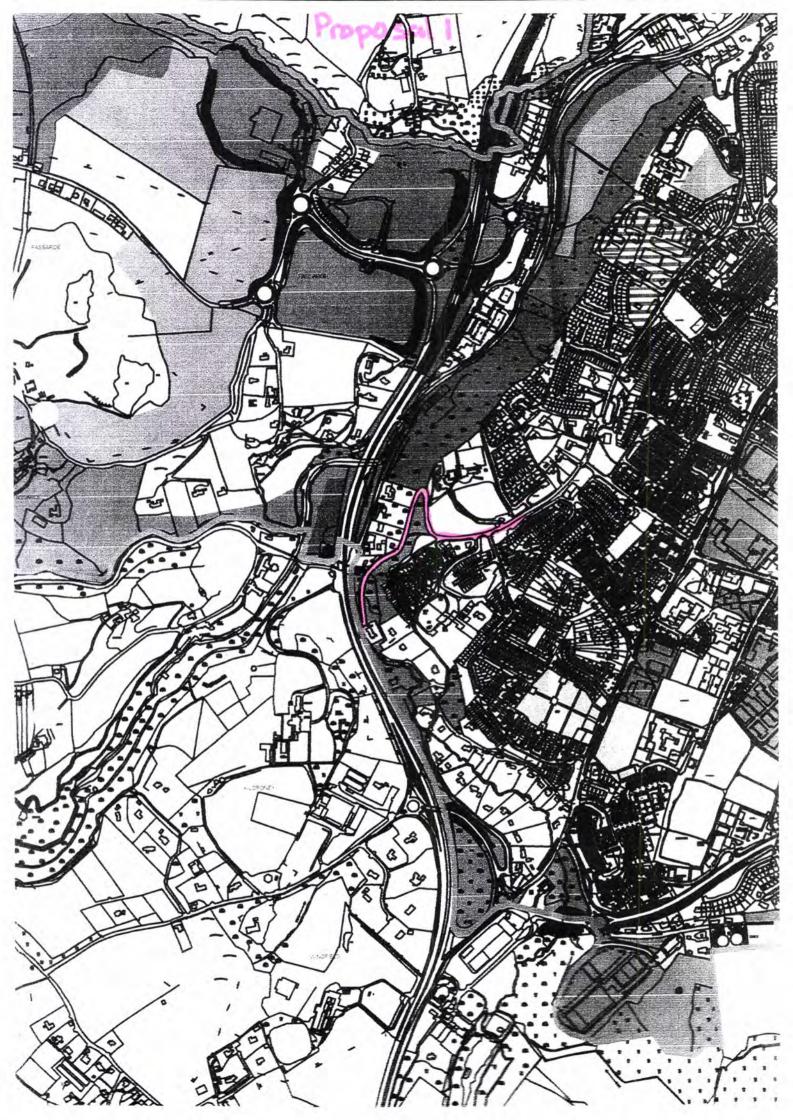
- 1. Chapter 9 Built and Natural Heritage, Draft Bray Municipal District Local Area Plan 2017.
- 2. Green Infrastructure Objective GI4 "To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in the Heritage Schedules of this plan" as outlined in Section 9.3. of the Draft Bray Municipal District Local Area Plan 2017.
- 3. Architectural Heritage Objectives as outlined in Section 10.2.3 of the Wicklow County Development Plan 2016-2022
- 4. Woodland, Trees and Hedgerows Objectives as outlined in Chapter 10, Section 10.3.3 of the Wicklow County Development Plan 2016-2022.

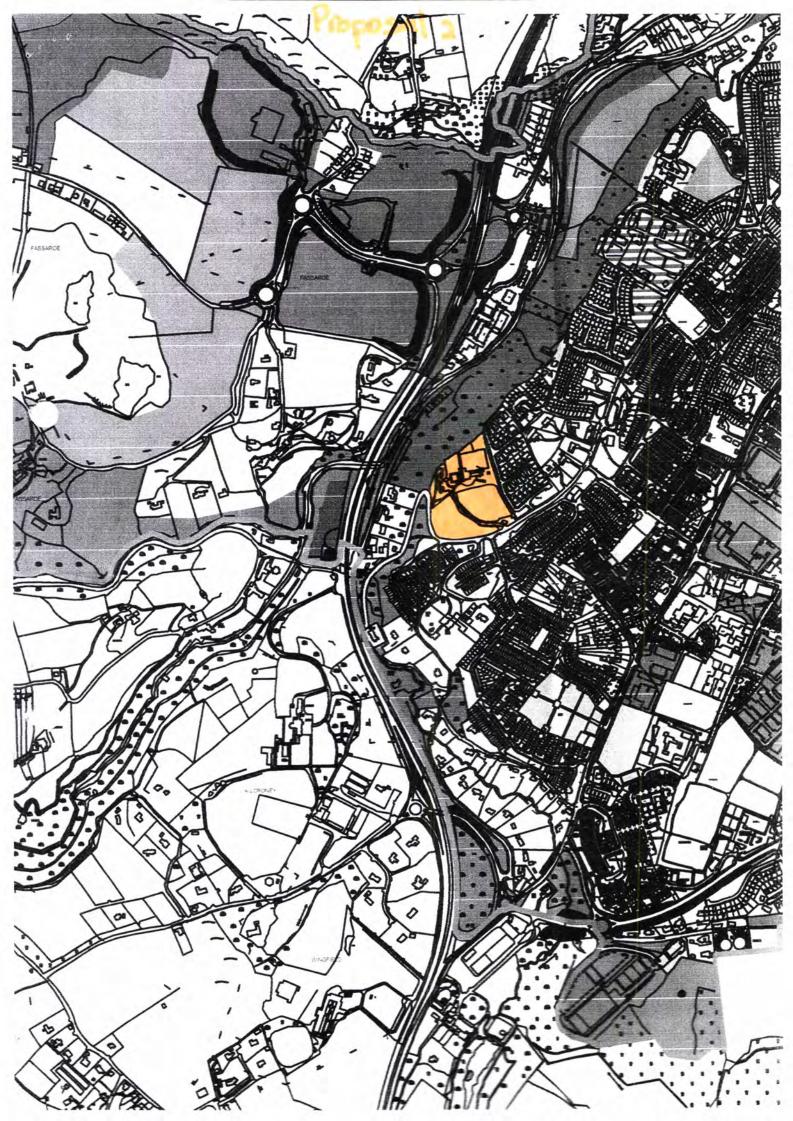
We appreciate your consideration of the above proposals and hope that you will take a favourably approach to their inclusion in Bray Municipal Local Area Plan 2017.

Yours sincerely,

Anne O'Dowd

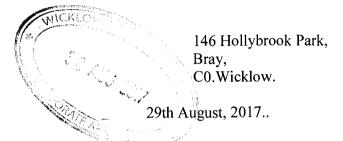
On Behalf of Ashton Wood Residents Association







Administrative Officer, Planning Section, Wicklow Co. Council, Wicklow Town, Co. Wicklow.



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

Dear Sir,

I wish to object in the strongest possible terms to the proposal to re-zone land at Kilruddery estate for housing and employment.

Environment.

You mention protecting Kilruddery estate no- where do you mention protecting the residents of Hollybrook Park and their environment.

The residents have spent years planting trees and trying to maintain the existing woodland in order to have a sound and visual buffer between the estate and Takeda and other factories in the industrial estate. If a walkway is placed near this boundary this area will be destroyed and will open up the whole estate to vandalism on a large scale and no protection for the people who have to live here. At this time, we have a wonderful collection of birdlife - Jays, finches, tree-creepers, ducks, wild pheasants and one beautiful woodpecker in this woodland. What happens to them? Traffic congestion.

I have lived here for fifteen years and in that time Wicklow Co. Council have done absolutely nothing to help with improving the traffic congestion on the Southern Cross Road. To get out of this estate at peak times is a nightmare. Has a traffic survey taken place?

Flooding.

I live very near to the Kilruddery boundary and during heavy rainfall my back garden is flooded to my back doorstep. I have had to resort to pouring buckets of water into the kitchen sink. Your proposal to put more development higher than the existing

Continued.

dwellings makes no sense. Where is the water to go? In view of recent events in Donegal maybe you should take a serious look at that proposal.

To re-zone a site behind Hollybrook Park from agricultural to industry is totally unacceptable. If you must, this site would make sense to be behind the existing factories with least impact on existing housing.

In any event, why not encourage industry onto derelict sites already zoned.

By re-zoning this land you have taken it away from the people of Wicklow forever. You have destroyed beautiful land that it supposed to be part of the garden of Ireland to put houses on. Affordable houses are needed in Bray not halfway up a hillside with no services.

I am dismayed at this proposal to destroy the natural environment on such a scale without any consideration being taken for the people who are already living here.

Yours sincerely,

Elaine Bailey.

From:

Ciara Slattery [c

Sent:

15 September 2017 08:35

To:

Planning - Plan Review

Subject:

BRAY MD LAP

Attachments:

170915_Submission to Bray MD Draft Local Area Plan.pdf

Good Morning,

Please see attached submission with regard to the Draft Bray Municipal District Local Area Plan.

I would be grateful if you could please confirm receipt by return.

Kind Regards,

Ciara Slattery BSocSci MPLAN MIPI



This email, including any attachments, is confidential and may be legally privileged. The email, including any attachments, is to be read solely by the intended recipient(s). If you are not an intended recipient, please notify the sender by return email and then delete all copies from your system. If you are not a named addressee you must not use, disclose, disseminate, distribute, copy, print or rely on this email, including any attachments. Emails cannot be guaranteed to be secure or free from errors or viruses. Please note that I have no authority, either express or implied, to bind or be bound in any manner whatsoever, and the existence of any contract is expressly denied. No contract shall exist until such time as a formal contract has been executed by both parties and a deposit paid. Nothing in this email or any other document issued by this office shall constitute a memorandum capable of satisfying Section 51 of the Land and Conveyancing Law Reform Act 2009.



Balark Trading GP Ltd.,

7TH Floor,

College House,

Townsend Street,

Dublin 2

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

15/09/2017

BY EMAIL

RE: BRAY MD LAP

Dear Sir / Madam,

This submission has been prepared by Balark Trading GP Ltd., in response to the notice given by Wicklow County Council of the proposal to make a new Local Area Plan for Bray Municipal District to include the Towns of Bray, Enniskerry and Kilmacanogue, (hereinafter Draft LAP).

Balark Trading GP Ltd. is a Group Company of Marlet Property Group Ltd., a leading residential home builder and commercial developer operating in the wider Dublin area and owning a residential landholding with the Bray Town boundary. We welcome this opportunity to comment on the Draft LAP, particularly with regard to measures which are likely to impact on the delivery of homes within the Municipal District over the lifetime of the LAP.

It is respectfully submitted that 2 no. amendments should be made to the Draft LAP via the Material Alterations process:

 It is recommended that the designation of the Kilbride Hill House lands as Open Space and Parks be 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. 2) It is recommended 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 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".

Kilbride Hill House

Balark Trading GP Ltd., owns a site of c. 3.7 ha at Kilbride Hill House and an ancillary c. 0.3 ha of woodland both accessed from Herbert Road as illustrated in the below Fig. 1.

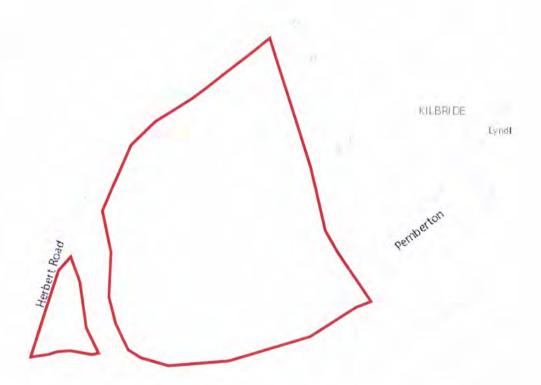


Fig. 1: Location of subject site

Kilbride Hill House is a Protected Structure. The RE Existing Residential Zoning of Kilbride Hill House has been retained in the Draft LAP. We note also that it is proposed to re-zone the ancillary area of woodland from RE Existing Residential to OS2 Open Space (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.



Fig. 2: Existing zoning as per Bray Development Plan 2011 - 2017

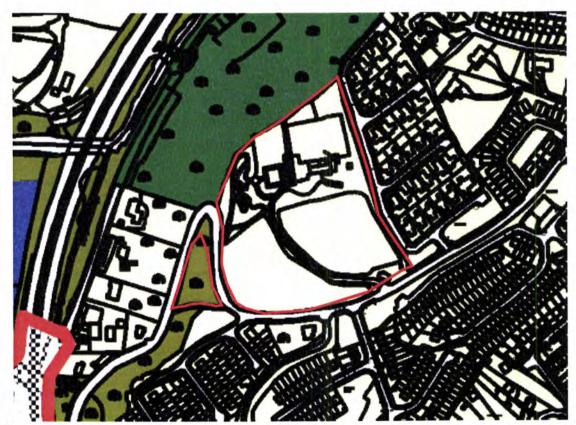


Fig. 3: Proposed zoning as per Draft Bray LAP

We welcome the retention of the RE Existing Residential Zoning for the main site and consider that with regard to the nature and topography of the ancillary site, the OS 2 zoning is appropriate.

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 as shown below:



Fig. 4: Extract from Map GI1 from the Draft Plan

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. We note that no other private residence within the Draft LAP has been identified as Open Space and Parks and consider that this could be 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 northwest and the retention and strengthening of the boundary tree belt. See fig. 5 for the proposed green infrastructure strategy for the site.



Fig. 5: Green infrastructure strategy as proposed under Reg. Ref. 171085

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. It is recommended 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.

Core Strategy

The lands at Kilbride Hill House are capable of accommodating 45 residential units which is almost a quarter of the total number envisioned for infill development in the Draft LAP as per Table 3.1 of the Plan. Therefore it is critical that its development potential is not prejudiced by inconsistent or unclear objectives.

We note the development strategy for Bray as provided by the Wicklow County Development Plan 2016 – 2022 which seeks to increase the population of Bray to 40,000 persons by 2028 requiring an additional 8,000 units. The Draft Plan states that the population of the Bray MD in 2016 was 35,530 persons which is a minor increase of 3.5% from the 2011 population (34,335). In order to meet the requirements of the Wicklow County Development Plan Core Strategy, there is a requirement for an additional 6,133 units in Bray up to 2025. With regard to the wider context and morphology of Bray, the N11 forms a barrier to development to the west with the urban Bray area extending from the N11 to the coastline to the west. Bray Head and the foothills of the Sugarloaf form a natural barrier to development to the south with limited development north of the River Dargle (to the north of the site) extending towards the Town Boundaries. As a result, the developable area of Bray is relatively constrained and in order to meet the requirements of the Core Strategy, a number of out-of-centre areas have been targeted for development including the Former Bray Golf Club, lands at Fassaroe and lands at Kilruddery.

When considering the most appropriate location for development, it is best practice to adopt a sequential approach beginning at the centre of the settlement and extending outwards. As such, the development of underutilised sites such as the lands at Kilbride Hill House should be facilitated, and indeed prioritised. Such lands represent existing zoned and serviced sites within established communities

Objective GI4

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 recommended 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 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".

Conclusion

In conclusion, the following amendments are recommended:

- It is recommended that the designation of the Kilbride Hill House lands as Open Space and Parks be 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.
- 2) It is recommended 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 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".

We trust that the above submission will be considered by Wicklow County Council in the making of the Draft Bray Municipal District Local Area Plan. We are available for discussion on any of the matters referred to above. We would also ask if you could confirm receipt of this submission by return.

Yours faithfully,

Ciara Stattery

Ciara Slattery BSocSci MPLAN MIPI

For and on behalf of Balark Trading GP Ltd.

From:

Richard Webb

Sent: To:

13 September 2017 13:01

Subject:

Attachments:

Planning - Plan Review
Bray Municipal District Local Area Plan 2017-2023
Ballywaltrim Lane and Wingfield Residents Association Bray LAP 2017.docx

Please accept the attached as the comments from the Ballywaltrim and Wingfield Residents Association.

Regards

Margaret Webb

Secretary

Ballywaltrim Lane and Wingfield Residents Association

Observations on the Draft Bray Municipal District Local Area Plan 2017-2023

We welcome this opportunity to comment on the above plan. In general the provisions of the plan are supported and comments are made on specific aspects below.

The major concern to residents is the proposal 8.1.4 on pp. 45 and 46 concerning the objectives for the M/N11 upgrade. We have seen the outline suggestions of TII in this regard (TII M11/N11 Corridor Study April 2017) and we 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 amenity through the destruction of trees and woodland that at present shield us from the motorway. We 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 Kilcroney Church.

If these proposals are developed then they will face vigorous opposition from our members.

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.

We are also 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.

We support 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.

We are concerned by the proposal in SLO 1 regarding the further development of Killruddery lands for residential and industrial purposes. We feel that this development would have a significant adverse impact on the functioning and visual quality of the Killruddery demesne, as well as making development on the lower slopes of the Great Sugarloaf more visually intrusive.

Other comments in relation to Bray are as follows:

5.1 Town Centre Development Objectives TC4

Tidy Towns adjudicators have already 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.

5.4 Bray Neighbourhood Centres

The proposal for a neighbourhood centre on the Southern Cross road is supported.

6.1 Open Space and Play objectives

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 skatepark where there is access to public transport and sufficient open space for it. A location on the seafront would be ideal. 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.

7.1 Bray Seafront and Esplanade

Objectives for the OS1 zoned area should include a prohibition on temporary commercial activities on the beach east of the esplanade, as happened recently.

7.2 Bray Harbour and SLO3

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 a 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.

7.4 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 Powercourt by means of a public access agreement with landowners.

9.3 The built and natural heritage and the green infrastructure objectives are supported.

G 15 and SLO3 Major open spaces

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. This would also preserve the fine view of Bray from the railway.

Finally, it is suggested that the boundary of Bray should be extended to the Wilton roundabout.

Ballywaltrim and Wingfield Residents Association c/o Springfields, Ballywaltrim Lane, Bray

From: John Murphy [john@bmaplanning.ie]

Sent: 15 September 2017 12:59 To: Planning - Plan Review

Cc: Ray Ryan

Subject: Submission to Bray MD LAP

Attachments: 170915 Bray LAP Submission Final.pdf

Dear Sir/ Madam,

On behalf of our client, Barnaby Investments Limited, please find attached a submission to the Draft Bray Municipal District Local Area Plan 2017 - 2023.

Please do not hesitate to contact me should you have any queries in relation to the attached.

Best regards

'ohn Murphy

Email: john@bmaplanning.ie

Mob: 0876562962 Tel: 01 676 4522

BMA PLANNING

128 Lower Baggot Street, Dublin 2

Web: www.bmaplanning.ie



This email and any files transmitted with it are confidential and are intended solely for use by the addressee. Any unauthorised dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this email in error please notify the sender and delete the message. Any views or opinions presented in this email are solely those of the author and cannot be relied upon as being those of BMA Planning. E-mail communications such as this cannot be guaranteed to be virus free, timely, secure or error free and we do not accept liability for any such matters or their consequences



A Please consider the environment before printing this email

SUBMISSION TO DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

RE: FORMER SCHERING PLOUGH LANDS AT BOGHALL

ROAD AND SOUTHERN CROSS ROAD, BRAY, CO.

WICKLOW

FOR: BARNABY INVESTMENTS LIMITED

Submitted to:

WICKLOW COUNTY COUNCIL planreview@wicklowcoco.ie



PLANNING AND DEVELOPMENT CONSULTANTS

128 Lower Baggot Street Dublin 2 Ireland

Tel: +353 1 676 4522 Fax: +353 1 676 3312 Email: info*ta* bmaplanning.ic

www.bmaplanning.ie

September 2017

1.0 INTRODUCTION

This submission to the Draft Bray Municipal District Local Area Plan 2017-2023 is on behalf of **Barnaby Investments Limited** in respect of their lands at Boghall Road and Southern Cross Road, Bray, (the former Schering Plough lands).

Measuring c.5.2 ha (13 acres), the lands extend in a north south direction between Boghall Road and Bray Southern Cross Road (Bray SCR).

The southern portion of the Barnaby lands, adjoins the eastern boundary of the Nechouka Limited "NS1" lands.

Two submissions have been made to date regarding these lands:-

- November 2016 Pre-draft submission on behalf of Barnaby Investments Limited in relation to the former Schering Plough lands.
- July 2017 Joint submission on behalf of Barnaby Investments Limited and Nechouka Limited, the owners of the adjoining "NS1" or "NC" lands

Barnaby Investments Limited and Nechouka Limited have had discussions in relation to the lands and have discussed how an integrated approach to the future development of their landholdings might be appropriately reflected in the forthcoming LAP and ultimately to achieve a more coherent and planned neighbourhood centre strategy. In this context, the outline development strategy that has been discussed is outlined below with proposed Amendments to the LAP that are considered appropriate to facilitate the orderly development of the lands

A separate submission from Nechouka Limited (c/o John Spain & Associates) is being submitted confirming their support for this development strategy and, in particular, to the extension of the NC zoning into the southern section of the Barnaby lands.

As agreed with Barnaby, the Nechouka Limited submission states as follows:

Support for Neighbouring Site Draft LAP Submission

3.6 Our client acknowledges the submission being made by Barnaby Investments Limited on the adjoining lands to the east and supports their request for a change in zoning of a portion of their lands from 'Employment' to 'Neighbourhood Centre' provided that this will not have an impact of the zoning of the lands subject to this submission on behalf of Nechouka Limited and that the subject lands at Southern Cross Road remain zoned as Neighbourhood Centre (NC) as per the Draft LAP.

2.0 OUTLINE OF DEVELOPMENT STRATEGY

The integrated approach to the Barnaby Investments Limited and Nechouka Limited lands illustrated in Figure 1 is based on the following principles: -

Roads

- As indicated in SLO6 of the LAP there is potential for a new road / street to be provided on the Barnaby Lands to connect Boghall Road and Bray SCR including.
- An access direct to the "NS1" lands from the SCR was previously permitted and can be included as part of any new scheme.

Pedestrian/ Cycle Connections

- As outlined in the previous submission, the north-south link would also facilitate the provision of the Swan River Greenway which currently terminates at Glen na Smole.
- Pedestrian connections between the neighbourhood centre and the adjacent residential estates
 can be provided as appropriate at detailed design stage.

Services Infrastructure

- There are potential synergies between the Barnaby and Nechouka lands in terms of connection to infrastructure already in place and subject to any minor upgrades.
- Storm water / flooding considerations and can be developed subject to adherence to best practice in terms of storm water attenuation and adherence to SUDS principles.

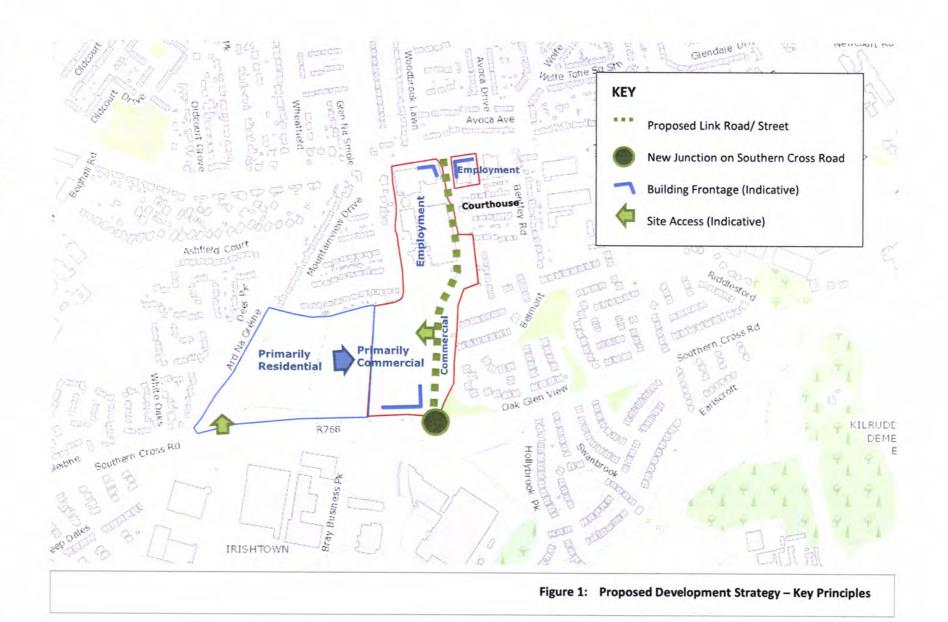
Land Use (Barnaby Lands/ Former Schering Plough):

- Southern Part (c 2.8 ha / c 6.9 acres): Neighbourhood Centre (ie. Mixed Use Commercial
 – No Residential possible).
- Northern Part Employment c.2.4 ha (6.1 acres),

NOTE: As stated in the previous submissions, there is a covenant on the title of the former Schering Plough lands precluding residential development on these lands. If a new road is constructed, the logical centre of gravity for the neighbourhood centre moves east towards the proposed new link road (see below). However, without uses to fund it, the new road will not be provided.

Land Use (Nechouka Limited Lands)

- A focus on new residential development within the Nechouka Limited "NS1" lands, particularly on the western end of the site.
- Mixed Commercial/ neighbourhood uses as part of the overall NC commercial uses on the Barnaby lands.



3.0 AMENDMENTS SOUGHT

The Draft Bray Municipal District Local Area Plan 2017-2023 proposes to zone the Schering Plough lands as "E: Employment". On the basis of the above, the following amendments are sought to the Draft Bray Local Area Plan 2017:-

Amendment #1: Zoning Map No.2

Barnaby / Former Schering Plough Lands - Southern Part (c 2.8 Hectares / c 6.9 acres): Amend the zoning of the southern section of the Barnaby Lands as outlined below, as follows

FROM: E Employment

TO: NC Neighbourhood Centre

No change is sought to the E Employment zoning for the northern portion of the Barnaby Lands.

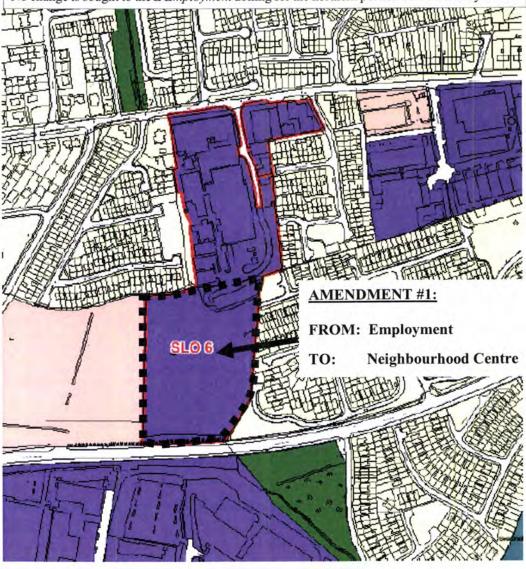


Figure 2: Amendment sought to Map no. 2 and SLO 6 Map

Amendment #2: Specific Local Objective SLO6

SLO 6: Employment Lands between Boghall Road- Bray SCR

- Revise SLO map to reflect NC Neighbourhood Centre zoning as per Amendment #1

Amendment #3: Zoning Matrix

The following additional uses to the list of "typical appropriate uses" on *Employment* lands, contained in Chapter 11, is sought:-

- Retail Warehousing
- Medical Uses (including Primary Care Centre)
- Motor Sales

4.0 CONCLUSION

We would welcome the opportunity to discuss the above Proposed "Amendments" to the Draft Bray Local Area Plan 2017 or any other aspect of this submission at your convenience.

If you require any further information in relation to any aspect of the above, please do not hesitate to contact the undersigned.

Ray Ryan BMA PLANNING ray@bmaplanning.ie

From:

Hugh Beckett [h

ា]

Sent: To: 14 September ∠u17 22:23 Planning - Plan Review

Subject:

Bray Municipal Plan re Kilruddery area

Dear Sir/Madam,

I would just like to add my objection to the draft plan for an increase in the size of Bray Business Park and the plan to zone for 240 extra housing units in the Kilruddery area.

There are three main points:

The level of traffic on the Southern Cross Road is already heavy enough in the morning rush hour period without the addition of another 240 households feeding onto this road, the N11 junction and the Vevay Road.

There is already a long-standing, strong requirement for some kind of retail facility for the existing estates on this road, without adding more houses to the equation, making the situation worse.

The location for these houses is on an excellent scenic and recreational resource for the Bray area and this planned development would ruin this. This was already set aside as an area of outstanding natural beauty, which should surely not be built on? This amenity is a credit to the Bray area and enjoyed by a large number of people from all over the county.

Regards and Thanks,

Hugh and Joanne Beckett

32 Hollybrook Park

From:

Alan Whelan [alan@oconnorwhelan.com]

Sent: To:

13 September 2017 13:30 Planning - Plan Review

Subject:

Bray MD LAP

Attachments:

OCW Submission to the Draft Bray Plan.pdf

Dear Sir / Madam

On behalf of Beralt Developments Limited, Heron House, Corrig Road, Sandyford Industrial Estate, Dublin 18, please see attached a submission in relation to the former Heiton Buckley site on Castle Street, Bray, Co. Wicklow.

I would appreciate if you could acknowledge receipt of same.

Regards

Alan

ALAN WHELAN

BA(Hons), MRUP, MIPI, MRTPI

Director

O'CONNOR WHELAN

222-224 Harold's Cross Road Dublin 6W

M: +353 86 4190058 T: +353 1 561 5000

E: alan@oconnorwhelan.com
W: www.oconnorwhelan.com

PLANNING CONSULTANTS



°C O N WHELAN O R

Submission to the Draft Bray Municipal District Local Area Plan 2017

Former Heiton Buckley Site, Castle Street, Bray, Co. Wicklow

Undertaken by:

O'Connor Whelan Limited

On behalf of:

Beralt Developments Limited Heron House Corrig Road Sandyford Industrial Estate Dublin 18.

September 2017



222 -224 Harold's Cross Road, Dublin 6W.

T:+35315615000 E:info@oconnorwhelan.com W: www.oconnorwhelan.com

Table of Contents

1.0	Introduction	1
1.1	Purpose of the Submission	1
2.0	Site Description and Planning Context	2
2.1	Site Description	2
2.1	Planning Context	3
3.0	The Subject Site and the Draft Plan	4
4.0	Suggested Revisions to Draft Plan	6
4.1	Plot Ratio	6
4.2	Set Back Requirements	7
4.3	Active Street Frontage	10
5.0	Conclusions	11

1.0 Introduction

1.1 Purpose of this Submission

This submission is made by O'Connor Whelan, 222-224 Harold's Cross Road, Dublin 6W on behalf of Beralt Developments Limited, Heron House, Corrig Road, Sandyford Industrial Estate, Dublin 18. 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, Co. Wicklow.

This submission relates to the aforementioned site and its status in the Draft Bray Municipal District Local Area Plan 2017. It is submitted in response to an invitation by Wicklow County Council to make submissions the Draft Plan during the statutory public consultation period which commenced on 2nd August 2017.

Whilst we welcome the Town Centre zoning objection and the designation of the site as an "Opportunity Site" in the Draft Plan, some of the objectives relating to the site are overly restrictive and will ultimately inhibit its redevelopment. The purpose of this submission, therefore is as follows:

- 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.

2.0 Site Description and Planning Context

2.1 Site Description

The site is located in a busy part of Castle Street, near the junction with Dwyer Park, close to the main bridge in the town over the Dargle River (see Figure 1). Castle Street is a prime urban street in the town and is the main thoroughfare connecting the Dublin Road and the dual carriage way with Bray Town Centre. The site is currently a vacant brownfield site, which was in use for quasi-retail purposes, accommodating Heiton Buckley's Builders Merchants with associated surface yard space storing building material. It has been vacant for a number of years.

The site is awkward and irregular in shape comprising two disparate elements. It has an overall area of 0.613 ha. The main site has significant frontage onto Castle Street and at present is dominated by palisade fencing with the detritus of the merchant yard activity behind, an inappropriate activity along such a principal commercial Street. The site contains 3 buildings: a two storey office building and a single storey retail building, both of which front onto Castle Street; and a warehouse building to the rear of the site. There are also two sheds located to the rear of the site. All of the buildings will be demolished to make way for the proposed development.

The secondary element of the site is located to rear and north-west of the main site and has a poor physical connection with same. It has no road frontage and could not be independently accessed from the road network. It is connected to the main site by a narrow strip of land making cohesive development problematic.

At present, the site is accessed off Castle Street via a gate in the palisade fencing.

The site is surrounded by a variety of land uses. There are residential units to the side (east) and rear (north) of the site, which are accessed via Dwyer Park. These houses are two storeys in height and directly abut the site.

There is a row of two storey shop units located to the front of the secondary element of the site is with frontage onto Castle Street and Supervalu Shopping Centre is located to the south of the site, on the other side of the road.



Figure 1 Site Location

2.2 Planning Context

The most relevant planning context to this site is the most recent planning application:

Planning Reference: 14/2174, PL27.245361

Permission was refused by both Wicklow County Council and An Bord Pleanála for a development consisting of the demolition of existing buildings and outbuildings (totalling 1,970 sq m gross) and associated site development works; the construction of a single storey double height Discount Food Store (with ancillary off-licence sales) measuring 1,635 sq m gross floor space with a net retail sales area of 1,164 sq m; associated signage; a revised vehicle access off Castle Street; surface car parking of 105 no. spaces, and 10 no. cycle parking stands; boundary treatments and all other ancillary and associated works.

A reason for refusal common to both decisions was that the application site is identified as an 'Opportunity Site' in section 4.4.13 in the Bray Development Plan whereby a Mixed Use Development is required. The provision of a single use retail development would not promote the appropriate redevelopment and intensification of use of this opportunity site and would result the site becoming an under-utilised town centre site.

It is apparent that this reason for refusal influenced the status of the site in the Draft Plan, in the particular the requirement for a plot ratio of not less than 2. As discussed in section 4.1 below, this is an entirely inappropriate parameter for the redevelopment of the site.

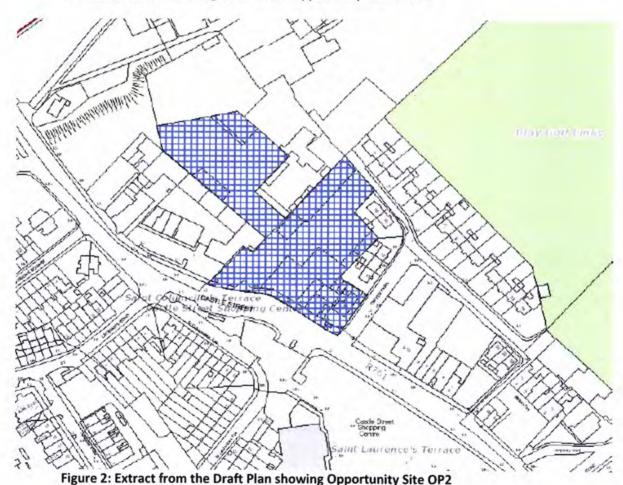
3.0 The Subject Site and the Draft Plan

The site is zoned 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."

The Description of Town Centre lands is:

"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."

The entire site is also designated as an "Opportunity Site" - OP2.



Former Heiton Buckley site on Castle Street, Bray, Co. Wicklow Submission to the Draft Bray Municipal District Local Area Plan 2017

The Draft Plan states the site is suitable for a high intensity mixed commercial and residential development. It contains a number of objectives specific to the site:

- "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 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; in particular, active commercial use shall be expected at ground floor, opening onto the street."

Whilst we welcome the Town Centre zoning and the Opportunity Site designation of the lands, we believe that some of these objectives are un-necessary and will inhibit the future development of the site.

4.0 Suggested Revisions to Draft Plan

4.1 Plot Ratio

One of the objectives requires a high density redevelopment of the site, with a plot ratio of not less than 2.

We believe the requirement for a plot ratio of 2 or anything near that figure is completely unworkable on this site. The site has an area of 6,950 sq m. To achieve a plot ratio of 2, a development of at least 13,900 sq m would have to be provided on the site. This may be achievable on an inner city site surrounded by similar high density developments, and where underground car parking would be economical.

The subject site, however, is a far different proposition. To achieve a plot ratio of 2, development would have to occur across the entire site. This is not possible for a number of reasons:

- It is bounded on a number of sides by 2 storey dwellings and single storey commercial
 units. In order to protect the amenities of the residential properties and the
 development potential / property rights of the commercial properties, appropriate
 setbacks from the boundaries would have to be incorporated into any future
 development.
- The site is an awkward shape, with the north eastern portion being effectively a back land area.
- It is bounded on a number of sides by 2 storey dwellings and single storey commercial
 units. In order to protect the amenities of the residential properties and the
 development potential / property rights of the commercial properties, appropriate
 setbacks from the boundaries would have to be incorporated into any future
 development.
- Underground car parking would be required which is not economical at this location.
- Any significant retail development on the site will require a loading area with an onsite truck turning circle.

As a result the developable area of the site is severely constrained. Figure 3 shows the developable area of the site when setbacks of 11 m and 5 m are taken into account. The minimum buildable area is 3,600 sq m. The north eastern portion, which can only be accessed from the front of the site, realistically, is not capable of accommodating any development other than a surface car park. If, however, the existing commercial units to the west and Town Centre zoned lands to the north of this area were incorporated into the site, then the entire commercial area would be ultimately developable to a high density. As these neighbouring lands are in multiple ownerships, this is a not a workable prospect.

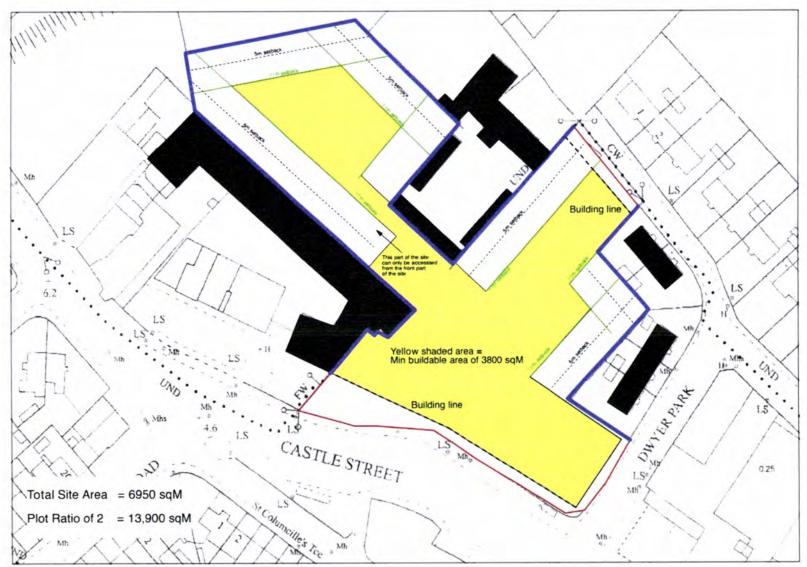


Figure 3: Constraints to Developable Area

As a result, in order to achieve the plot ratio of 2, the remaining lands would have to be developed at a height of up to 6 storeys. This is not a realistic prospect for lands adjoining two storey dwellings in Dwyer Park.

We suggest that setting minimum plot ratios is impracticable for any site without a detailed design being undertaken in the first instance. Indeed, we know of no other Development Plan or Local Area Plan that sets minimum plot ratios for particular sites.

In this regard, we suggest the objective is revised to:

"A high density development that makes the best use of this serviced urban land, with a plot ratio of not less than 2, in a 3-4 storey development."

4.2 Set Back Requirements

One of the objectives of the Draft Plan states that any set back in excess of 5m from the kerb on Castle Street must be justified on specific design criteria and in any event buildings shall not be set back any further than 15m from the kerb.

We believe that this is an impractical approach which is not based on actual design principles specific to this site. Vehicular access is a key issue in relation to the future development of the site. As highlighted in the most recent application for the redevelopment of the site, sightlines, particularly north-west along Castle Street, are difficult to achieve. Indeed the previous applicant had to undertake a deal with the adjoining landowner in order to achieve the necessary sightlines.

The requirement to have a maximum of 15 m setback from the kerb may not possible in order to achieve the necessary sightlines. Figure 4 shows a site layout for a revised retail and residential development on the site (which will be subject to a future planning application). It is possible to achieve a street frontage along the east half of the site, but the western edge may have a setback more than 15 m from the kerb in order to achieve the necessary sightlines. A setback greater than 15m may also be required to maintain the building line along Castle Street.

In this regard, we request Wicklow County Council to change the wording of this objective to:

"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."

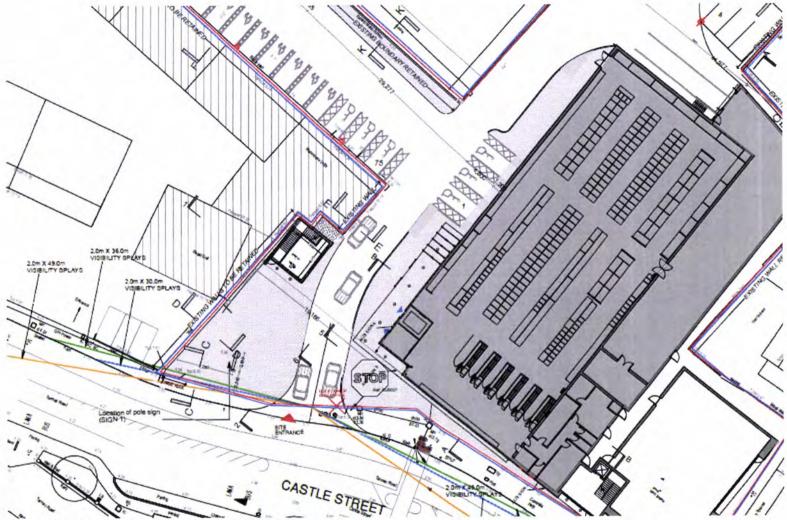


Figure 4: Potential Future Development of the Site.

4.3 Active Street Frontage

The final objective of the Draft Plan pertaining to this site seeks that any proposed development adjoining existing streets shall provide for an active street frontage / commercial uses, opening onto the street.

We have no issue with this objective where it relates to Castle Street. However the site also opens out onto to O'Dwyer Park at the rear, which is strictly a residential street. To create active commercial uses on this street would ruin the residential nature of this street and badly affect existing residential amenities. In addition commercial units at this location, opening out onto a minor residential street with little or no footfall would not be commercially viable.

We suggest therefore, that this objective is clarified to read as follows:

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

5.0 Conclusions

We welcome the Town Centre zoning objection and the designation of the site as an "Opportunity Site" in the Draft Plan. However, some of the objectives relating to the site are overly restrictive and will ultimately inhibit its redevelopment.

We therefore recommend that the following wording changes are made to these specific objectives:

Plot Ratio:

"A high density development that makes the best use of this serviced urban land, with a plot ratio of not less than 2, in a 3-4 storey development."

Setback:

"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."

Active Street Frontage:

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

Please do not hesitate to contact the undersigned should any clarification be required on the foregoing.

Yours faithfully

Alan Whelan Director

O'Connor Whelan Limited

Alan Whelan

Leonora Earls

From: Sent:

Julia Bird |

Julia Bird | 11 September 2017 21:38

To:

Planning - Plan Review

Cc:

Cllr. Tommy Annesley, Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC;

Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr.

Shay Cullen; Clir. Mary Kavanagh; Clir. Daire Nolan; Clir. John Snell MCC; Clir. Irene

Winters MCC

Subject:

Feedback on Bray Local Area Plan

We have reviewed the Proposed Bray Local Area Plan 2017 and we wish to submit an objection to this plan being approved in relation to the proposed reasoning of Kilruddery lands. We have copied in the Wicklow councillors on this email so that they are aware of objections when voting on the Plan.

Our reasons for objecting are as follows:

- 1. The Plan does not comply with the wishes of the Brabazon family of Kilruddery so it doesn't represent their actual plans for the land.
- 2. We would strongly object to the second commercial zone directly behind the houses in Hollybrook Park based on the existing businesses causing noise and environmental pollution and the potential for this to increase. This commercial zone is too close to the houses and the buffer zone in the previous plan has been removed. It is not an appropriate place to locate a commercial zone between housing estates when there is other land behind the existing business park available.
- 3. We are concerned with the pedestrian and cycle entrance through the existing green area in Hollybrook Park as it will damage the natural sounds barrier that exists from the trees to the business park.
- 4. We are also concerned with the very strong potential of numerous cars parking in Hollybrook Park to gain an easier access to the new houses, planned Park and other amenities that the Plan details. Any development in this area must be segregated from the existing estates so it is not used as a bypass to access the land and all traffic should be strictly be routed through the Kilruddery estate.
- 5. There are already problems with flooding in some properties in the Hollybrook Park estate and any development that blocks the natural flood plain is likely to increase these problems.
- 6. We object to the houses being located in the zoned land per the Plan due to the loss of an important protected natural amenity and the height of the buildings based on the land height.
- 7. It is not appropriate to build more housing and commercial units in this area until local amenities and infrastructure are improved. The roads are already gridlocked at many different times of the day and there are no local amenities despite previous promises.

Please can you ensure that our objections are noted to the proposed plan.

Regards Julia & Graeme Bird 48 Hollybrook Park Bray

Leonora Earls

From:

Deirdre Kirwan

Sent:

15 September 2017 16:52

To:

Leonora Earls

Subject:

Submission on Draft Bray LAP

Attachments:

Submission on Bray LAP (Blueton Properties) Final Update (15.9.17).pdf

шj

Leonora,

Can we please replace our submission by Bluetone Properties Limited with the attached.

We picked up a minor typo in client name at the last minute.

Your help is greatly appreciated.

Kind regards,

Deirdre Kirwan John Spain Associates, 9 Fitzwilliam Place, Jublin 2, D02 ND61.

T: 01 662 5803 M: 087 2826855

e-mail: dkirwan@johnspainassociates.com

web: www.jsaplanning.ie



John Spain Associates

Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal professional privilege, and copyright. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it.



39 Fitzwilliam Place Dublin 2 D02 ND61

www.jsaplanning.ie

Tel 01 662 5803 info@johnspainassociates.com

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

15th September 2017

Dear Sir/Madam,

RE: <u>SUBMISSION ON THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017</u>

1.0 INTRODUCTION

- On behalf of our client Bluetone Properties Limited (in Receivership) c/o William O' Riordan and Declan Mc Donald (Joint Receivers), Price Waterhouse Coopers we wish to make a submission on the Draft Bray Municipal District Local Area Plan 2017. The submission relates to lands located at Kilgarron Hill, Enniskerry, Co. Wicklow, which is noted at Action Area 2: Parknasilloge in the Draft Bray Municipal District LAP 2017.
- 1.2 The Draft LAP sets out a number of specific policies and objectives for the development of Action Area 2 which our client generally welcomes. However, there are certain objectives which restrict the overall development potential of the lands which should be revised in the publication of the final Local Area Plan.
- 1.3 This submission specifically relates to the unit numbers, density, and phasing of Action Area 2 and the specific housing policies restricting the residential unit size within the Action Area.
- 1.4 It is respectfully requested that the following be amendments be considered for inclusion within Enniskerry Action Area 2: Parknasilloge in the publication of the Bray Municipal District LAP 2017:
 - 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;
 - The phasing strategy be amended to remove the restriction in the phasing of housing delivery linked to delivery of employment.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRIPI MIPI

Executive Director: Erika Casey BA (MOD) MRUP MRIPI MIPI

Associate Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Stephanie Farrington BA MA (EDS) MRUP MIPI Robert Keran BS. LLB MIPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 39 Fitzwilliam Place, Dublin 2, D02 ND61.. VAT No. IE 6416306U

Associate Offices: London Manchester Leeds

• The removal of Enniskerry Specific Housing Objective R7 to enable appropriate sized units with regard to the stated densities.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The subject lands are located at Kilgarron Hill which is a short distance to the north west of the traditional Enniskerry town core. The lands are greenfield in nature. Knocksink Woods cSAC is located to the north east of the lands.
- 2.2 To the south, the lands abut the existing GAA pitch and grounds which have an area of c. 2 ha. The southern boundary of the site is formed by the Enniskerry to Glencree Road (L011). To the west, is the Park na Sillogue Court development of local authority housing. To the east, the site adjoins the grounds of St. Mary's Church and the adjoining primary school of St. Mary's and St. Gerard's.

3.0 DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017

3.1 The Draft Bray Municipal District Local Area Plan 2017 sets out a number of policies and objectives for Enniskerry. In particular, the LAP notes the development of our client's lands under Action Area 2: Parknasilloge to which this submission relates.

3.2 The LAP states the following:

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 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.

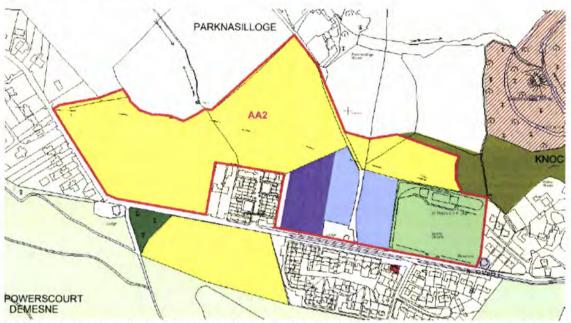


Figure 1: Extract from the Bray Municipal District LAP indicating Action Area 2: Parknasilloge

3.2 In addition, the Draft LAP notes a number of specific objectives in relation to employment, residential development and green links which relate to the development of the subject lands as follows:

Enniskerry Specific Housing Objectives

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.

R7 A full range of unit sizes, including smaller 1 and 2 bedroomed units shall be provided in all new housing area. No more than 50% of the units in any development shall exceed 3 bedrooms or 125 sq.m. in size.

Enniskerry Specific Economic Development Objectives

EE2 To provide c.1ha of employment lands in the form of high quality office / surgery / studio type employment and local service and incubator business (in Action Area 2).

Green Infrastructure Objectives

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:

 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.

4.0 GROUNDS OF SUBMISSION

- 4.1 This submission seeks amendments to the Draft LAP to recognise the development potential of the subject site in terms of increased unit numbers, density and phasing.
- 4.2 The LAP states in relation to the phasing of Action Area 2: Parknasilloge that 1ha of employment lands shall be delivered no later than Phase 2 of the development and shall be accompanied by no more than 75% of the residential units.

"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".

- 4.3 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.
- 4.4 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.
- 4.5 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 overall development of the area.
- 4.6 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 amendment to the following:
 - "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 made available in Phase 1 accompanied by no more than 50% of the residential development.
- 4.7 In addition, the LAP sets out a maximum number of residential units for Action Area2: Parknasilloge. The LAP states:
 - "A maximum of 156 residential units may be provided on the remainder of the site (8.8ha)".
- 4.8 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.
- 4.9 In accordance with the Sustainable Development Guidelines for Residential Development in Urban Areas 2009, it is states that for outer suburban / green field sites "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".
- 4.10 The Guidelines continue to state that "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".
- 4.11 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.
- 4.12 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.
- 4.13 In addition, 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.
- 4.14 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, therefore should be omitted in this instance in the context of the relatively low densities for Enniskerry.

5.0 CONCLUSIONS

- 5.1 This submission is made on behalf of our clients Bluetone Properties Limited (in Receivership) c/o Declan Mc Donald (Receiver), Price Waterhouse Coopers on the policies and provision set out in the Bray Municipal District Local Area Plan as it relates to Action Area 2: Parknasilloge.
- 5.2 It is respectfully requested that the Action Area 2 policies be amended to remove the restriction in the phasing of housing delivery linked to delivery of employment as this is detrimental to the development potential of the lands for housing due to the lack of demand for additional employment opportunities without a critical mass of population in the area being established. The employment lands should be brought forward at such time that the critical mass and ancillary services are in place to present viable employment opportunities.
- 5.3 In addition, it is respectfully submitted that Objective R7 be omitted and the maximum number of units within Action Area 2: Parknasilloge be increased from 156 no. to 176 no. (20 no. units per hectare) as to provide for a more appropriate density in accordance with national policy for the development of Greenfield lands.

5.4 We would be grateful if our submission could be considered in the preparation of the plan.

Yours sincerely,

John Spain Associates

Jan Spin Ason.

Leonora Earls

From:

Iris Bodenham i

Sent:

12 September 2017 15:42

To:

Cllr. Tommy Annesley; Planning - Plan Review

Cc:

Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom

Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net;

Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary

Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC;

simon.harris@oir.ie

Subject:

Bray Local Area Plan

To whom it may concern

I hereby oppose in the strongest terms of the three significant changes that have been proposed by the council.

New zoning on the Kilruddery Estate. Changing the estate from green belt to Conservation and Tourism Zoning.

New Residential zoning on lower slope of small sugarloaf.

New industrial Zoning backing onto the existing industrial estate

My family and I are residents of HollyBrook park for over 20 years. We the residents have been maintaining our beautiful green spaces, trying to keep HollyBrook park a clean and safe environment for present and future families. The county council do not participate in the maintenance of HollyBrook Park.

The one thing that we should be preserving is beautiful green space. This is what is unique to Bray, that it is on the edge of the main city in the country but also extremely scenic. As you approach Bray on the N11 the scenery dramatically changes, and all over the town the views of the small Sugarloaf and Bray head make he town what it is.

I am aware that we have a housing crisis and need to urgently build more homes, but there is alot of land around that is not as scenic as this exact part you are proposing building on. There is the hideous open space the other side of the Southern Cross for example. This is a waste land, ugly and an eyesore. Apparently it was zoned for development 10yrs ago and sold, but nothing has happened yet. So you could purchase that back (less the penalties they should have been paying for not developing) for most likely alot less than you would have to pay for Kilruddery lands.

The small Sugarloaf can be seen from all round and many people walk up and down it, exercise their dogs etc. It is a very used piece of parkland.

I am actually shocked at the proposal to build on it.

Iris Bodenham

٠.

43 Giltspur Wood Bray Co Wicklow

11 September 2017

Administrative Officer Planning Section Wicklow County Council Wicklow Town

Your ref: BRAY MD LAP 2017

Wicklow County Council

1 4 SEP 2017

PLANNING DEPT.

Dear Sir/Madam.

We are writing to object to the rezoning of land adjacent to Oldcourt House and Giltspur Wood to R20 'New Residential' status, as set out in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017). Our reasons for this objection are:

a) Health and Safety

- Access to the new housing area would require breaking through an existing, safe and child- friendly, cul-de-sac which has been part of the estate for over 20 years.
- The popular, child-friendly green spaces adjacent to the entrance and opposite the Oldcourt
 Castle are essentially the playground for the estate. Access to the new houses would bring
 large amounts of additional traffic directly beside the green areas, resulting in a significantly
 increased risk to child safety.
- Additionally, all construction required on the rezoned land would result in large amounts of heavy construction traffic passing through the estate for a prolonged period of time. As the route this traffic would take is directly beside the green spaces, this would be a major concern for the safety of children playing in the estate.

b) Traffic Congestion

Recent traffic changes around Claire's Villas and Old Soldiers Road, coupled with traffic from the neighbouring Castlelynn development, have drastically increased the traffic volume on Oldcourt Park leading to Killarney Road. New development in the area would exacerbate this further.

c) Flood Risk

The OPW Fluvial Flooding map tool outlines that the Oldcourt River and surrounding land, including the proposed re-zoned field, is included within the 1 in 100-year flood zone.

d) Tree Preservation Order

There is a tree preservation order which covers all the trees on the proposed rezoned site and all the land surrounding the site. "Order no. 5- Oldcourt House and Vevay House, Swan River".

e) Wildlife

The proposed rezoned field and the surrounding land supports a rich and diverse set of wildlife, which would be greatly damaged by the loss of this area to housing.

f) Protected Structures

There are four protected monuments adjacent to the land in question. Developing on the proposed rezoned land would risk their preservation and future.

We request that you consider our submission and objections in respect of this proposed rezoning as outlined above.

race but for

Yours faithfully.

Stephen & Tracy Booth

Leonora Earls

From:

Ray Ryan [ray@bmaplanning.ie]

Sent:

14 September 2017 10:17

To:

Planning - Plan Review

Cc:

Viv Boylan

Subject:

170914 Killruddery - Draft LAP Submission

Attachments:

170914 Killruddery - Draft LAP Submission.pdf

SUBMISSION TO DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

PROPOSAL FOR REZONING OF LANDS AT KILLRUDDERY ESTATE, KILLRUDDERY ESTATE, SOUTHERN CROSS ROAD, BRAY, CO. WICKLOW.

FOR: JOHN AND ANTHONY BRABAZON

See Submission attached

RAY RYAN

Email: ray@bmaplanning.ie

lob:

Tel:

01 676 4522

BMA PLANNING

128 Lower Baggot Street, Dublin 2

Web: www.bmaplanning.ie



PLANNING AND DEVELOPMENT CONSULTANTS

This email and any files transmitted with it are confidential and are intended solely for use by the addressee. Any unauthorised dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this email in error please notify the sender and delete the message. Any views or opinions presented in this email are solely those of the author and cannot be relied upon as being those of BMA Planning. E-mail communications such as this cannot be guaranteed to be virus free, timely, secure or error free and we do not accept liability for any such matters or their consequences



Please consider the environment before printing this email

SUBMISSION TO DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

RE: PROPOSAL FOR REZONING OF LANDS AT

KILLRUDDERY ESTATE, KILLRUDDERY ESTATE, SOUTHERN CROSS ROAD, BRAY, CO. WICKLOW.

FOR: JOHN AND ANTHONY BRABAZON



Submitted to:

WICKLOW COUNTY COUNCIL planreview@wicklowcoco.ie



128 Lower Baggot Street Dublin 2 Ireland

Tel: +353 1 676 4522 Fax: +353 1 676 3312 Final: info*(a* bmaplanning)c

www.bmaplaming.ie

September 2017

1.0 INTRODUCTION

This submission to the *Draft Bray Municipal District Local Area Plan 2017-2023* ("Draft LAP") is submitted on behalf of **John and Anthony Brabazon** in relation to their lands at Killruddery Estate, Southern Cross Road, Bray, Co. Wicklow.

The submission provides a review of the Draft LAP in respect of the Killruddery Estate and sets out the zoning and objectives that our clients seek to have included in the *Bray Municipal District Local Area Plan 2017-2023*.

In summary, our client has serious concerns regarding certain draft residential zoning relating to the Killruddery Estate which they believe is not practical. Area 4 ("Foggy Field") is considered to be a suitable residential site and the rezoning of this area is sought in lieu of the residential zoning on Area 2

2.0 REVIEW OF DRAFT LOCAL AREA PLAN / AMENDMENTS SOUGHT

Figure 1 attached shows Areas 1-4 which are sub areas of Killruddery Estate lands defined for the purpose of this submission and outlines the zoning objectives sought for these areas.

Figure 2 is an extract of the Draft LAP Zoning Map and also includes Areas 1-4 for ease of reference..

2.1 AREA 1 'KD' - ' Kilruddery Demesne Conservation & Tourism Zone'

A new tourism/conservation zoning objective has been introduced in the Draft LAP for Killruddery Estate and is referred to as 'KD' – 'Kilruddery Demesne Conservation & Tourism Zone'. This zoning extends beyond what was the original 'Tourism' zoning area and now includes all lands to the south and east of the house, within the LAP boundary.

With the exception of the request to exclude the Foggy Field (Area 4) from the KD zone, our client supports this new "KD" zoning.

The zoning matrix and specific objectives reflect existing uses aswell as a range of potential tourism and leisure related uses which would provide for the consolidation of the tourism function of Killruddery in the context of the Bray urban area. However, the potential of the area for hosting events and functions needs to be reflected in policy in addition to the potential for tourist and visitor accommodation. This is addressed under the SLO below

AREA 1

Retain "KD" zoning in Area 1

Remove Area 4 "Foggy Field" which is proposed for "Residential" zoning

2.2 AREA 2 'R20'- Residential Development Zoning & 'AOS' -Open Space Zoning

A residential zoning is included for lands to the west of the house and gardens, and south of the lands now zoned for employment use, referred to as Area 2. The draft zoning objective is 'R20 - To protect, provide and improve residential amenities at a density up to 20 units/ha.'

Our client objects to this proposed zoning for the following reasons:-

- Our clients 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).

The open space zoning 'OS2- To protect and enhance existing open, undeveloped lands' should be included in place of the residential areas identified in the Draft Plan – Area 2.

The AOS (Active Open Space) zoning which is intended to provide playing pitches, playgrounds etc.for the residential zoned lands should also be removed

AREA 2

Rezone Area 2

From: 'R20' residential zoning AND AOS (Active Open Space)

To: OS2 - To protect and enhance existing open, undeveloped lands'

2.3 AREA 3 - Employment Uses

Our client supports the draft zoning of Area 3 as E-Special Employment which seeks 'To provide for the development of enterprise and employment at Kilruddery'. No amendment is sought.

AREA 3

Retain E-Special Employment zoning

2.4 AREA 4 'Foggy Field' - Residential Use

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.

We enclose 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.

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.

AREA 4

Rezone Foggy Field (4.3 hectares (10.6 acres)

From: KD

To:

Residential



Sketch layout proposal for residential development in Area 4 "Foggy Field" 4.3 ha (10.6 ac)

2.5 Specific Local Objective

To reflect the amendments sought by this submission we request that the strikethrough text below is deleted from the SLO for Killruddery and that the wording set out in red is accepted.

'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.

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 / northwest 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.

The development of these lands shall comply with the following objectives:

- 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.

-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 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).

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.

- 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.

-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 location of such uses are shown indicatively on the concept plan to follow, which is reflect 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.'

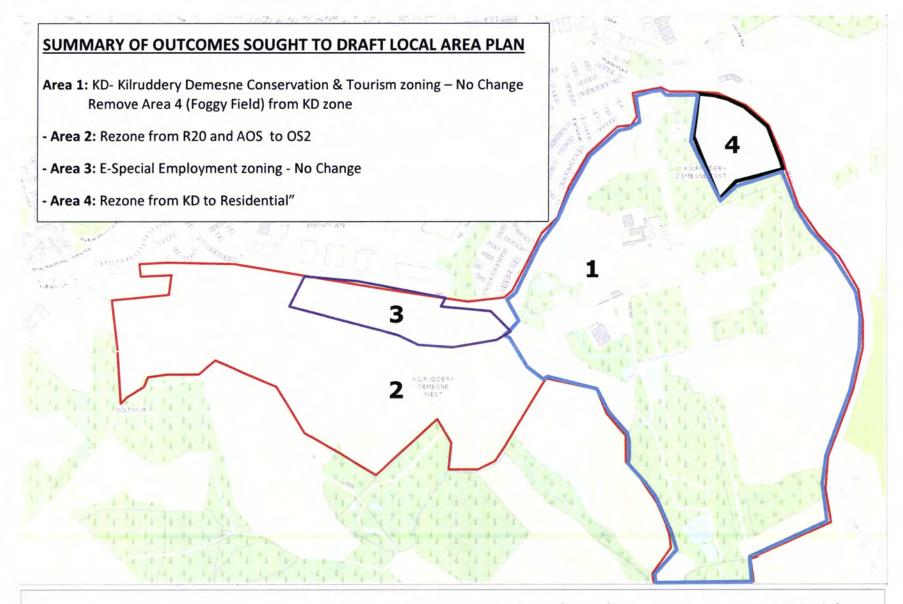


Figure 1: Proposed Development Strategy – Key Principles

3.0 CONCLUSION

We trust that the above is in order. If you require any further information in relation to any aspect of the above, please do not hesitate to contact us.

BMA PLANNING September 2017

Carolyn Brady Giltspur Wood Brav. Co Wicklow Date: 06/09/2017

Administrative Officer. Planning Section, **Wicklow Co Council** Station. Wicklow Town

Wicklow County Council PLANNING DEPT. Dear Administrative Officer:

BRAY MD LAP 2017

We are writing to make a submission in objection to the rezoning of land, adjacent to Oldcourt House and Giltspur Wood, as R20 'New Residential'. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017). We have outlined several reasons for this objection.

a) Health and Safety

- To gain access to the field would require breaking through an existing, safe and child friendly, cul de sac which has been part of the estate for over 20 years.
- The popular and child friendly green area is essentially the playground of the estate; Access to the land would bring large amounts of traffic directly beside the green area bringing an increased risk to child safety.
- Any construction required on the rezoned land would result in large amounts of heavy vehicles and construction traffic going through the existing estate for a prolonged period. The route this traffic would take is directly past and alongside the popular green and would be a major concern for the children playing in the estate on the large green area.

b) Traffic Congestion

Recent changes to the direction of traffic in the area, Soldiers Road, coupled with the neighbouring new development, Castlelynn, have dramatically increased the traffic on the road and the road usagein the vicinity. New development in the area would exacerbate this further.

c) Flood Risk

The OPW Fluvial Flooding map tool outlines that the Oldcourt River and surrounding land, including the proposed re-zoned field, is included within the 1 in 100-year flood zone.

d) Tree Preservation Order

There is a tree preservation order which covers all the trees on the proposed rezoned site and all the land surrounding the site. "Order no. 5- Oldcourt House and Vevay House, Swan River".

e) Wildlife

The proposed rezoned field and the surrounding land support a rich and diverse set of wildlife.

f) Protected Structures

There are four protected monuments adjacent to the land. Developing on the proposed rezoned land would position new buildings and structures extremely close to these precious monuments, risking their preservation and future.

We would ask that you consider our submission and objections in the hope of preventing the WICKLOW COUNTY COUNCIL rezoning of the land we have outlined.

Sincefely,

Corporate Affairs

Leonora Earls

From: Sent:

info [info@braychamber.ie] 15 September 2017 11:36

To:

Cc: Subject:

Attachments:

Planning - Plan Review
'Mick Glynn'; 'Pat O'Suilleabhain'
BMD Local Area Plan 2017 Bray Chamber Submission Bray Municipal District Local Area Plan 2017 Chamber Submission 15 Sept 17.pdf; Bray

Municipal District Local Area Plan 2017 Chamber Submission 15 Sept 2017.docx; Cover

letter submission 2017.doc; Appendix for submission.pdf

Administrative Officer Planning Section Wicklow Co Co **Station Road** Wicklow

Friday, 15 September 2017

Dear Leonora,

Please find attached a submission regarding the Draft Bray Municipal District Local Area Plan 2017 from Bray & District Chamber of Commerce CLG.

Should you have any queries please do not hesitate to contact the office on 01-2828248.

Thank you for your time,

Kind Regards,

Pat O Zuilleabhain

Pat O'Suilleabhain

President

Bray & District Chamber of Commerce CLG

Promoting Business, Supporting the Community



Bray & District Chamber CLG Chamber of Commerce House 10 Princes of Wales Terrace, Bray, Co. Wicklow Tel: 01 282 82 48 Fax: 01 276 0272

Email: <u>info@braychamber.ie</u> <u>www.braychamber.ie</u>

Administrative Officer Planning Section Wicklow Co Co Station Road Wicklow

Friday, 15 September 2017

Dear Leonora,

Please find attached a submission regarding the Draft Bray Municipal District Local Area Plan 2017 from Bray & District Chamber of Commerce CLG.

Should you have any queries please do not hesitate to contact the office on 01-2828248.

Thank you for your time,

Kind Regards,

Pat O Zuilleabhain

Pat O'Suilleabhain
President
Bray & District Chamber of Commerce CLG



Draft Bray Municipal District Local Area Plan 2017-2023

Introduction:

This submission is made by the Bray and District Chamber of Commerce 10 Prince of Wales Terrace Bray, County Wicklow ('the Chamber'). The submission outlines a number of amendments to be taken into consideration when drafting the final plan. In summary our key objectives of this submission is to address residential development, reduction of retail development, traffic management and car parking in the Town Centre, and a development of a tourism strategy.

General:

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 ('WCC') to ensure that the plan is being actioned.

Physical Context:

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. Sufficient zoning has been provided for population growth and housing projections to 2025. 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.

Residential Development:

The 2005 permission for the Florentine centre including inter alia, 110 residential units and 549 car parking spaces along with commercial space. The development was seven stories high with a further three floors below ground and we believed that the permission granted met the objectives set out in the draft LAP and objective HD5 of the County Development Plan in order to make best use of land resources and services.

The current permission obtained by WCC is much more modest and has no residential aspect. Should this permission not be development in the short term we would support a much greater concentration and mix of development that reflects on the importance of the site to the Town Centre.

Tel: 012828248



Fassaroe and Bray Golf Club Land:

The Chamber supports the rapid delivery of the maximum number of good quality housing units for the above lands. The units need to be of mixed sizes and of a high quality build. Consideration should be given to blocks of apartments of 4, 5,6 stories and greater where appropriate.

Town Centre and Retail Strategy for Bray:

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/ Louglinstown, 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. The Chamber is therefore concerned at the stated intention 'to facilitate the delivery of a large scale retail development on the former Golf Cub Lands'. Any such development will be detrimental to the existing Town Centre.

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

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.

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.

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.

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).

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.

Infrastructure & Services:

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.

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

Built Heritage and natural Environment

Further erosion of lands at the **Killruddery 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.

Oldcourt Castle is hidden gem which the Chamber believes 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.

Economic Development & Employment:

Tourism is a growth industry, employment intensive and brings consumers with disposal 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.

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

Tel: 012828248



at Dun Laoghaire, Wicklow and Arklow and the available of suitable sites for small, medium and large projects.

Tourism & Recreation

As part of the Tourism Strategy we would request the following be included:

- 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 Killruddery Estate and through the Estate (with then 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 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.

Bray Gateway & Transportation Hub:

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 Kilmcanaogue 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



Conclusion:

5. Guardian Article 23/7/2017

The chamber is committed to working with the local authority to maximise the potential of the Bray Municipal District Area and to ensure that best practice is applied, that the plan is soundly formed taking into consideration the rapidly changing world of retail, the housing, educational and employments needs of the population, the dramatic impact of new technology on transport, on how and where we work and how we will spend our leisure time.

Dated the 13 th September 2017		
Signed:	Mick Glynn Bray & District President On behalf of the Bray	
& District Chamber of Commerce		
Appendices:		
1. Bray Golf Club Development mark	keted as 'The Bray Town Centre' Scheme	
2.2005 Florentine Scheme	•	
3.2017 Current propose Florentine S	Scheme	
4.Waterford Greenway		

Tel: 012828248



Draft Bray Municipal District Local Area Plan 2017-2023

Introduction:

This submission is made by the Bray and District Chamber of Commerce 10 Prince of Wales Terrace Bray, County Wicklow ('the Chamber'). The submission outlines a number of amendments to be taken into consideration when drafting the final plan. In summary our key objectives of this submission is to address residential development, reduction of retail development, traffic management and car parking in the Town Centre, and a development of a tourism strategy.

General:

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 ('WCC') to ensure that the plan is being actioned.

Physical Context:

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. Sufficient zoning has been provided for population growth and housing projections to 2025. 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.

Residential Development:

The 2005 permission for the Florentine centre including inter alia, 110 residential units and 549 car parking spaces along with commercial space. The development was seven stories high with a further three floors below ground and we believed that the permission granted met the objectives set out in the draft LAP and objective HD5 of the County Development Plan in order to make best use of land resources and services.

The current permission obtained by WCC is much more modest and has no residential aspect. Should this permission not be development in the short term we would support a much greater concentration and mix of development that reflects on the importance of the site to the Town Centre.

Tel: 012828248



Fassaroe and Bray Golf Club Land:

The Chamber supports the rapid delivery of the maximum number of good quality housing units for the above lands. The units need to be of mixed sizes and of a high quality build. Consideration should be given to blocks of apartments of 4, 5,6 stories and greater where appropriate.

Town Centre and Retail Strategy for Bray:

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/ Louglinstown, 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. The Chamber is therefore concerned at the stated intention 'to facilitate the delivery of a large scale retail development on the former Golf Cub Lands'. Any such development will be detrimental to the existing Town Centre.

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

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.

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.

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.

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).

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.



Infrastructure & Services:

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.

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

Built Heritage and natural Environment

Further erosion of lands at the **Killruddery 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.

Oldcourt Castle is hidden gem which the Chamber believes 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.

Economic Development & Employment:

Tourism is a growth industry, employment intensive and brings consumers with disposal 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.

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.



Tourism & Recreation

As part of the Tourism Strategy we would request the following be included:

- 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 Killruddery Estate and through the Estate (with then 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 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.

Bray Gateway & Transportation Hub:

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 Kilmcanaogue 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



Conclusion:

5. Guardian Article 23/7/2017

The chamber is committed to working with the local authority to maximise the potential of the Bray Municipal District Area and to ensure that best practice is applied, that the plan is soundly formed taking into consideration the rapidly changing world of retail, the housing, educational and employments needs of the population, the dramatic impact of new technology on transport, on how and where we work and how we will spend our leisure time.

Dated the 13 th September 2017		
Signed:	Mick Glynn Bray & District President On behalf of the Bray	
& District Chamber of Commerce		
Appendices:		
1. Bray Golf Club Development ma	rketed as 'The Bray Town Centre' Scheme	
2.2005 Florentine Scheme		
3.2017 Current propose Florentine	Scheme	
4.Waterford Greenway		

Leonora Earls

From:

on behalf of Bray Harbour Action Group

[brayharbouractiongroup@gmail.com]

Sent:

15 September 2017 15:34

To: Subject:

Planning - Plan Review
Bray Harbour Action Group submission re Bray MD draft LAP
BHAG submission re Bray MD draft LAP 150917.pdf

Attachments:

Good afternoon,

Please find attached a submission on behalf of Bray Harbour Action Group.

Best regards,

Mark Henderson



c/o Bray Sailing Club The Harbour Bray Co. Wicklow

15th September 2017

Administrative Officer Planning Section Wicklow County Council Station Road Wicklow Town

Re: Submission regarding the draft LAP on behalf of BRAY HARBOUR ACTION GROUP

Dear Sir/Madam,

Bray Harbour Action Group is a group representing all of the water-based users of Bray Harbour (see attached list of member organisations). 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.

We are 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.

We note and welcome that Section 7.2 of the draft LAP says that "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".

Our member organisations will support any efforts to achieve this aspiration.

We are 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 "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."

We 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 our 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. We would encourage anyone who disagrees to visit the harbour on a busy Saturday or Sunday in the middle of the summer.

While we recognise that Bray faces significant traffic issues, due to the limited number of access routes and river crossing points, we feel that using the harbour as a partial solution to this problem is absolutely incompatible with the objective of creating "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". We are of the opinion that the implementation of any such proposal would be the final death knell for water sports in Bray. Therefore, we ask that this paragraph be amended to reflect the prioritisation of access to the water and that any suggestions of using the harbour as a though road be abandoned forthwith.

Yours faithfully,

Ger Crowley Chairperson

BRAY HARBOUR ACTION GROUP MEMBER ORGANISATIONS		
Bray Adventures	500+ Participants Per Annum, 5 Instructors	
Bray Harbour Mooring Holders Assoc	50 Members	
Bray Head Fishing & Social Club	250 Members	
Bray Sailing Club	200 Adults, 130 Juniors, 12 Instructors	
Bray Sea Anglers	50 Members	
Bray Sea Scouts	260 Scouts, 74 Leaders	
Bray Veteran Kayakers	25 Members	
Bray Youth Services	350 Children, 5 Instructors	
Row-A-Round	25 Members	

Leonora Earls

From:

Sent:

To:

Subject: Attachments: Tony Foran [ton 15 September 2017 16:40 Planning - Plan Review BHMHA Submission re draft LAP L150917 Submission LAP.pdf

Dear Sir /Madam,

Please find attached submission to LAP.

Regards,

Tony Foran

e-mail:

Mobile:

BRAY BARROUR MOODING COLUED ASSOCIATION ITB

(A Company limited by guarantee and not having a share capital) c/o Bray Sailing Club, The Harbour, Bray, Co. Wicklow

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

15th September 2017

Dear Sir/Madam.

Re: Submission regarding the draft LAP on behalf of BRAY HARBOUR MOORING HOLDERS ASSOCIATION Ltd

I write as chairperson of the BHMHA Ltd in connection with current draft LAP.

I have had sight of a draft submission being delivered today 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.

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. We do however require access to our vehicles to load and unload gear as appropriate before/after all water-based activities.

Yours sincerely,

Tony Foran [Ph: 086 254 7331]

Chairperson

Bray Retailers Group (BRG)

c/o Liam McGarry 19 Main Street Bray County Wicklow

Attention:

The Administrative Officer

Planning Section

Wicklow County Council

13th September 2017

Dear Sir/Madam,

BRAY MD LAP

Please receive our attached submission to the process of producing the Bray Municipal District Local Area Plan 2017 to 2023.

This submission was created on foot of consultations with retailers in Bray Town. Bray Retailers Group circulated 250 copies of the draft Local Area Plan to retailers in the Town Centre, Castle Street, Dublin Road, Egan's Centre, Strand Road, Vevay Road and the Boghall Centre. A public meeting for retailers was held on 30th August 2017 in the Royal Hotel. Attendees shared their comments on the draft Local Area Plan and to generate ideas to address issues related to land-use and the physical development of Bray with a focus to promote growth and prosperity in the town.

Please acknowledge receipt and confirm further engagements in the production of the final Local Area Plan.

Sincerely

Frank Power (Chair) .

Liam McGarry (Secretary)

John Keyes (Executive member)

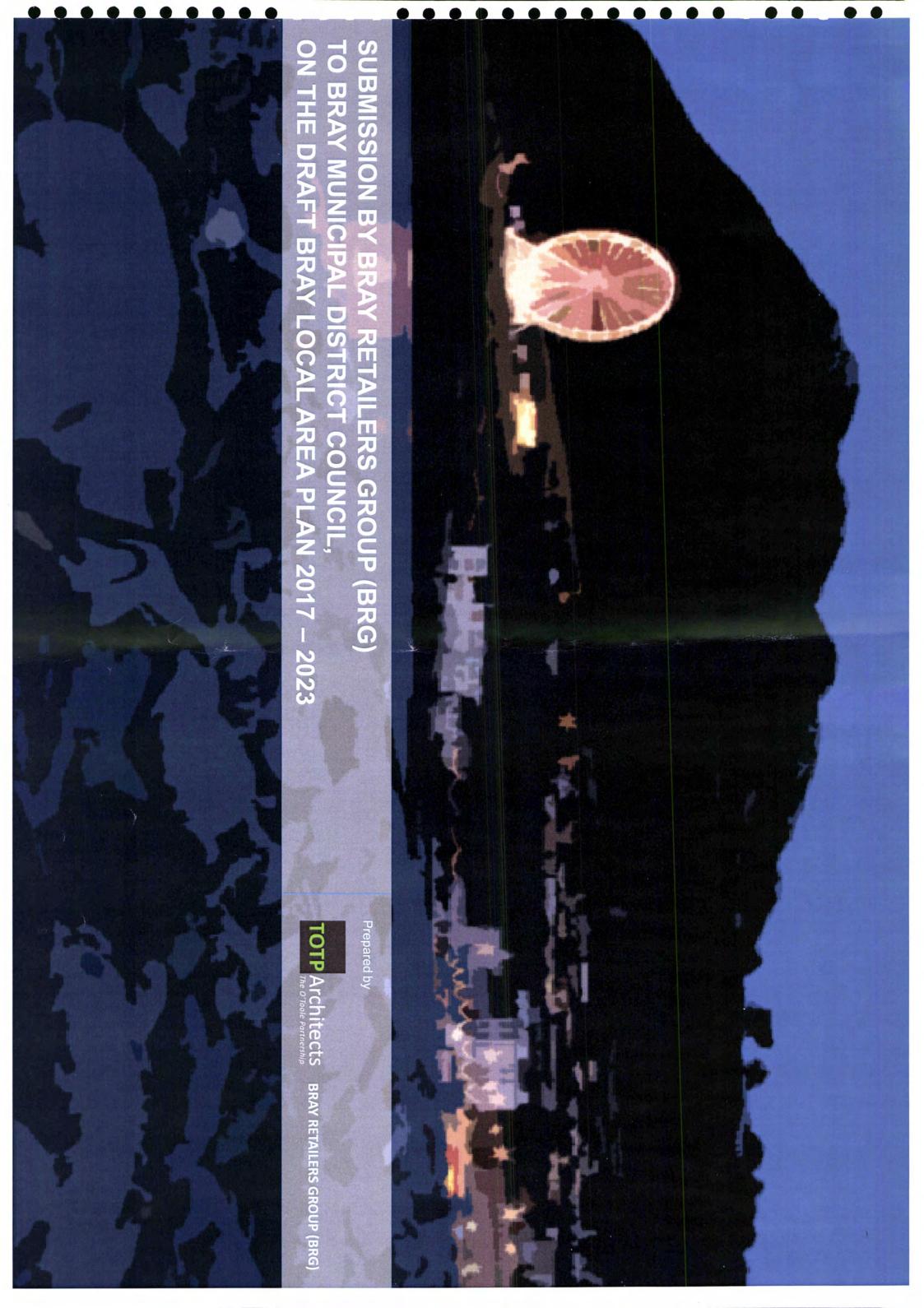
Michael Bannon (Executive member)

WICKLOW COUNTY COUNCIL

1 5 SEP 2317

WICKLOW CALANTAIN CHORE PT.

1 5 SEP 231



PREAMBLE

The preamble of the draft Local Area Plan states that the role of the land use plan is to put in place a framework within which development can occur in the Bray Municipal District.

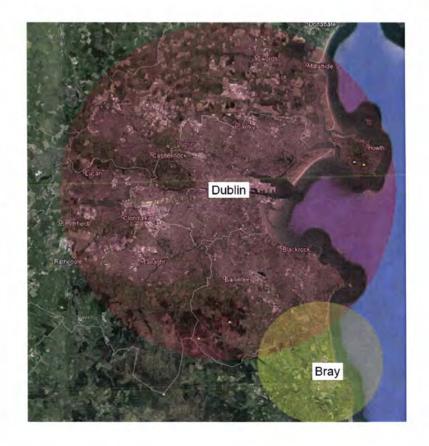
The development of the Bray Municipal District Local Area Plan 2017 - 2023 comes at a time when Ireland has recovered from its worse financial crisis and when the nation is preparing for a new course of sustainable economic development and growth.

Four trends will impact on the future economic activity in Bray namely:

- the future growth patterns of Dublin city and its commuting areas;
- the digital revolution;
- the future arrangements in the European Union including the consequences of Brexit;
- the resilience (or lack of) of local urban areas in the wake of climate change.

The business environment will however 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 on existing footplates, where residents will be able to buy online and collect in the shop. Some research in the UK is showing a secondary buying behaviour where customers who collect also buy other items 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.

How Bray responds and competes in this regard is in our hands as the larger community and institutions of the Bray Municipal District.





Bray is well positioned to benefit from the continued growth of the Dublin Metropolitan Region. Significant 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 launchpads 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 probusiness environment facilitated locally and nationally.



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 As defined by Eurostat.

Many town centres and high streets in the UK and Ireland continue to experience depressed sales with the growth of online retail and the presence of out-of-town malls and retail warehouses. 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.

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.

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.





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.

The rejuvenation of the Bray Main Street is an ongoing project that follows the vision of a new urbanism evident in Europe and other parts of the world. The draft Local Area Plan recognises the importance of a set of actions and continued commitment of various role players to change the town centre through urban design and placemaking initiatives. In this sense many towns in Europe of similar size serve as great examples.

The Bray Retailers Group is optimistic that we have the capacity to grasp these opportunities and deal with the challenges to steer the development of our town for the benefit of future generations.

Herewith specific proposals to parts of the draft Bray MD Local Area Plan: See for example the EU's Urban Innovative Actions Initiative with a fund of €372m for authorities to tackle urban challenges.

Chapter 8: INFRASTRUCTURE

8.1 Roads and Transportation

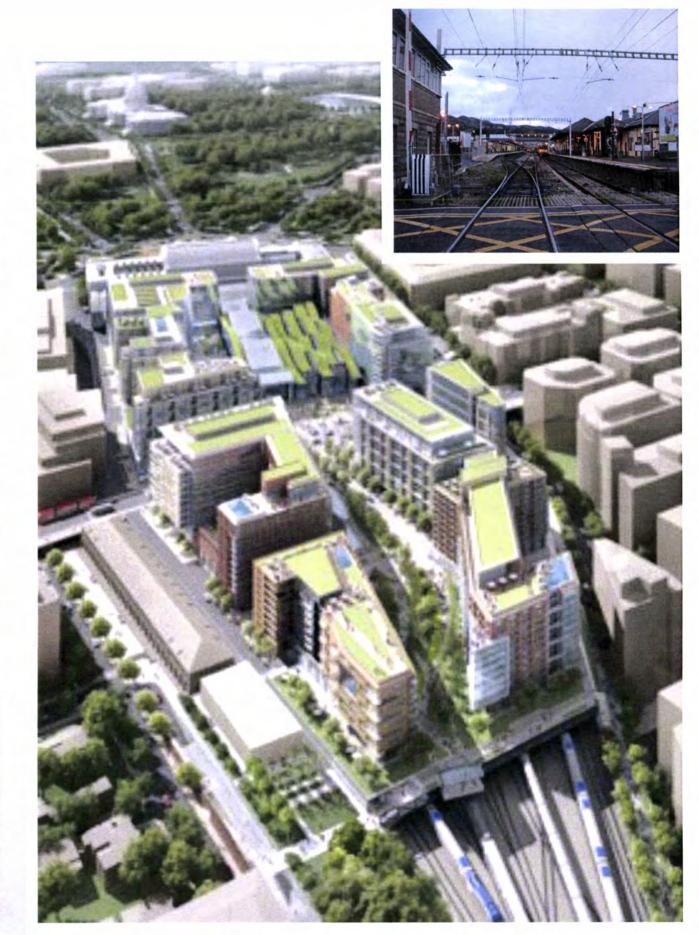
The draft Local Area Plan proposes a number of Public Transport and Road Objectives with which the Bray Retailers Group concurs. In particular the Group wants to see the Local Transport Plan for Bray and Environs being developed by the NTA to comprehensively alleviate the chronic traffic flow and congestion 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.



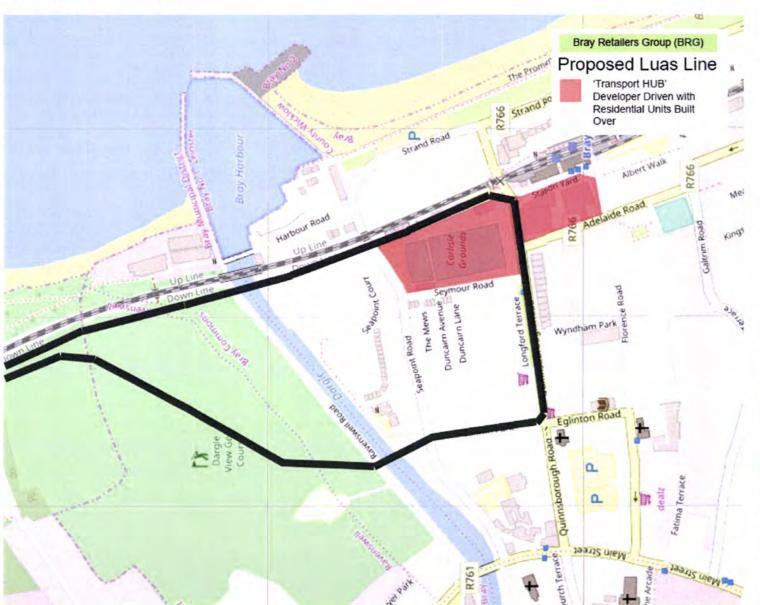




Bray furthermore needs to leverage its high quality public transport connections. The Bray Retailers Group proposes the development of a new transportation hub at the Carlisle grounds and siding area that will accommodate one main intercity railway line linking Bray to Rosslare Europort, two DART lines, 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 parkand-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.





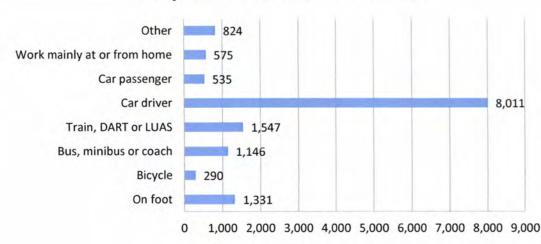


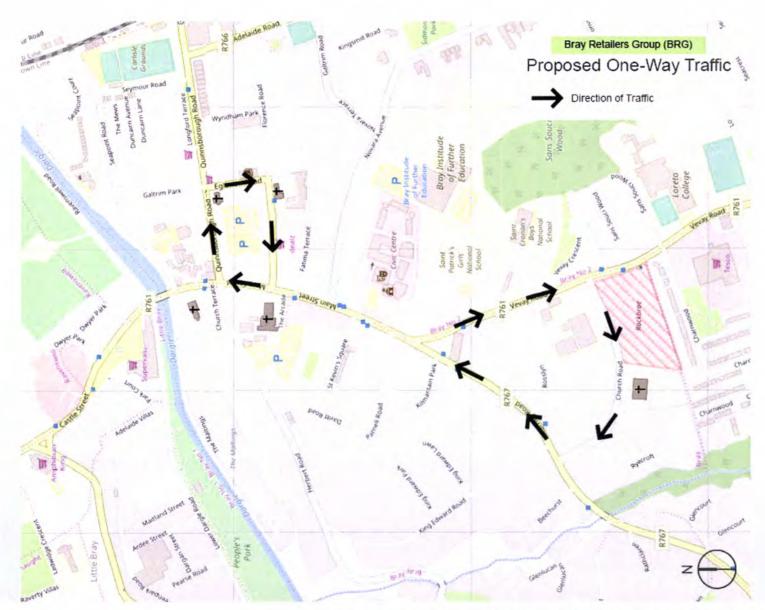




The Group believes the new transportation hub will enable a much better uptake of public transport compared to the disappointing Census 2016 statistics. See chart below:

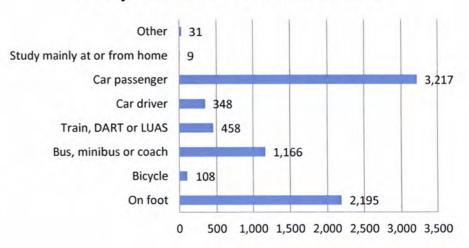
Bray: Mode to Travel to Work





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 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. See chart below:

Bray: Mode to Travel to School



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.

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.

Chapter 5: TOWN/ NEIGHBOURHOOD CENTRES & RETAIL

5.1 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.

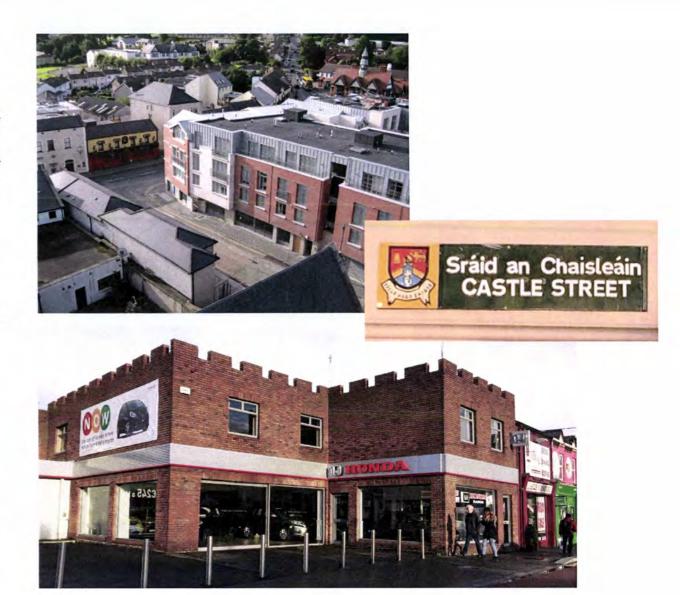
5.4 Bray Neighbourhood Centres

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.







5.5 Bray Opportunity Sites

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.

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.

Chapter 10: KEY DEVELOPMENT AREAS

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 the above-mentioned 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.

The Specific Local Objective for the development of the golf course 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. Again, 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.





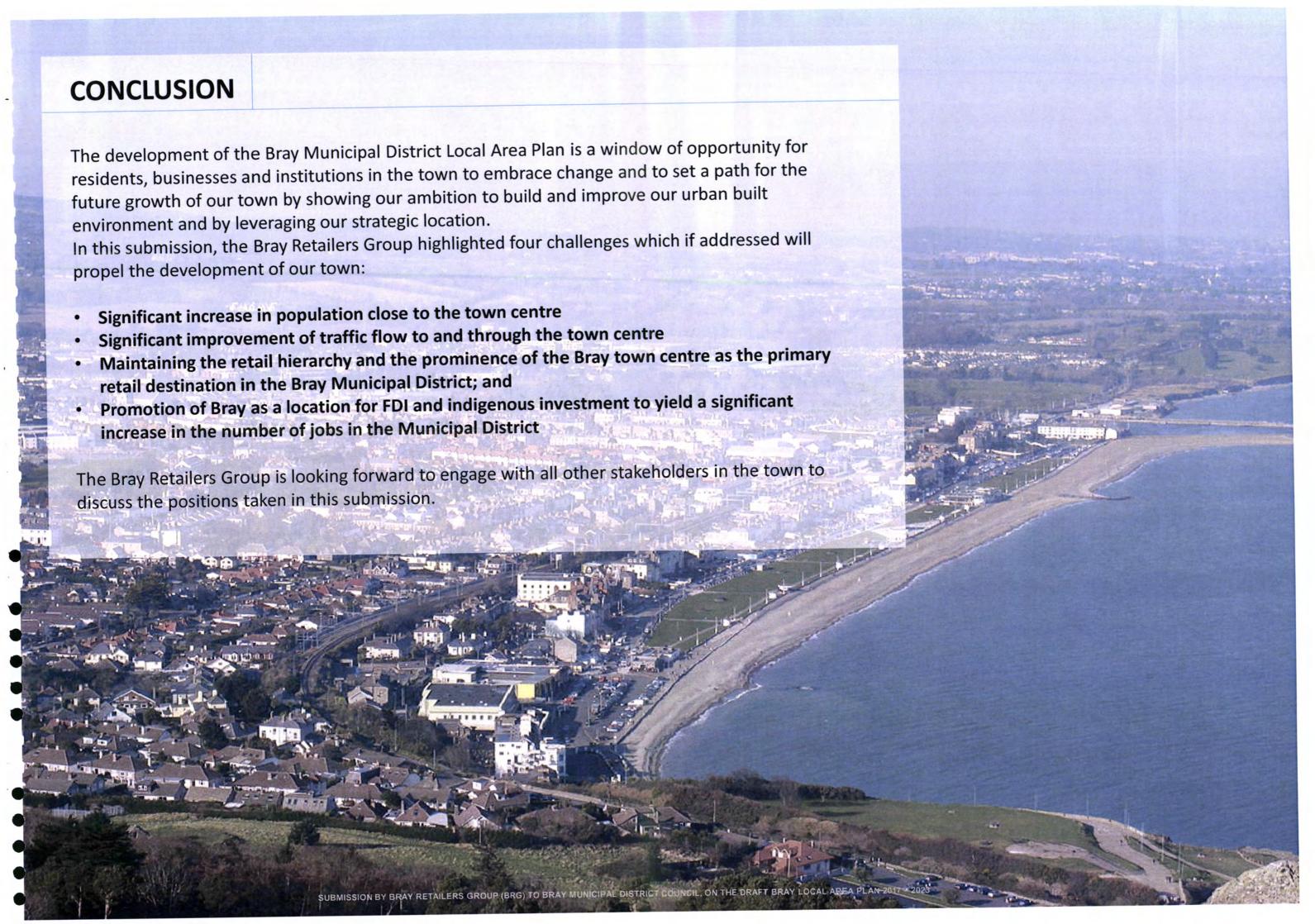




2.2.4 Economic Development and Employment

The Bray Retailers Group concur with targets set in the draft Local Area Plan to significantly increase jobs growth in the town centre and in existing employment sites.

In relation to the Specific Local Objective SLO 6 which signifies employment lands between the Boghall Road and the Southern Cross Route, it is proposed to create a Strategic Development Zone with a focus on Life Sciences and to gear the proposed developments in such a SDZ towards investments in this field that could yield up to 1,500 jobs. The location is convenient both with good access from the N11 as well as with the possibility for employees to avail of more affordable accommodation in the vicinity. This could also be a valuable real estate option for the IDA to present to investors in the light of Brexit.



Leonora Earls

From:

Sent:

Ronan Laffan 14 September 2017 22:43

To: Cc:

Planning - Plan Review commodore@braysailingclub.ie BRAY MD LAP

Subject:

Attachments:

Bray Sailing Club Draft MD LAP Submission.docx

To: Administrative Officer, Planning Section, Wicklow County Council

Please find attached a submission on behalf Bray Sailing Club on the Draft Bray Municipal District Local Area Plan 2017.

Regards

Ronan Laffan Harbour Officer, Bray Sailing Club The Harbour **3ray** Co. Wicklow ror cc



Bray Sailing Club The Harbour Bray Co. Wicklow

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

14th September 2017

Submission regarding the draft LAP on behalf of Bray Sailing Club

Dear sir/madam,

We wish to comment on section "7.2 The Harbour" of the "Draft Bray Municipal District Local Area Plan 2017 – Written Statement".

We welcome the tenor and content of the section in general however have serious concerns regarding the final bullet point in the section – i.e. "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."

We recognise the need for improvements in road, pedestrian and cyclist infrastructure in the area. We 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 we believe likely to be promoted again in the lifetime of this plan as the golf course lands are developed.

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. Our sailing club depends on access to the harbour across the current roadway when launching dinghies, rescue boats and other vessels. In our peak summer months, we have up to 60 children each day under instruction in the harbour, unavoidably crossing the road and operating close to it on 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.

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 "To improve road and pedestrian / cyclist infrastructure in the area", we believe the reference to "linkages" should be separately stated as an objective and constrained to pedestrians and cyclists – i.e. "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".

Ronan Laffan Harbour Officer, Bray Sailing Club

Leonora Earls

From:

Sent:

15 September 2017 13:37

To: Subject: Planning - Plan Review Bray MD LAP

Attachments:

LAP objection.doc

To: Administrative Officer, Planning Section, Wicklow County Council

Attached please find a submission on behalf of Bray Sea Scouts on the Draft Bray Municipal District Local Area Plan.

We would appreciate if if you could confirm receipt of this submission.

Regards

Stephen Carvill Group Leader ray Sea Scouts.

 0°



5th Wicklow (Bray) Sea Scouts, Dock Tce, Bray, Co. Wicklow.

14th September 2017

Submission regarding draft LAP on behalf of Bray Sea Scouts

Dear Sir/Madam,

We 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".

We are a scout group located in Bray Harbour since 1965, we now comprise 350 youth and adult members ranging in age from 6 to 80 years of age. We meet weekly year round in our premises built on the site of the former Dock Terrace. Our boating program includes use of the harbour and surrounding bay by our various sections on 5 nights every week, and at the weekend. We store our boats in our 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 our reputation in the community we are heavily over-subscribed: our waiting list presently runs to 700. We therefore consider ourselves a stakeholder in the Harbour.

We welcome the statements in the section, in particular the acknowledgement of the importance of community and recreational assets to the town. We note 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. We also would like to see the Harbour become more active, and improve its recreational and touristic value to the community.

Our concerns relate to the 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 club lands to the west"

We are pleased with the recent works in the Harbour which will provide footpaths and cycle tracks in the area.

We 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 our transport of all boats to the water more dangerous to the scouts. It would also make it extremely difficult to transport some of our larger boats: our 2 East Coast skiffs are 29 feet long and are pulled by hand, the rib requires a jeep to pull it on its trailer.

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.

We would therefore ask for this paragraph to be amended so that a through road is neither advocated nor can be inferred in the future. We suggest this amendment:

"To improve/provide linkages to the north beach, the seafront, Dargle River walk and the former golf course lands for cyclists and pedestrians."

Stephen Carvill Group Leader 5th Wicklow (Bray) Sea Scouts

Leonora Earls

From:

Bray Skateboarding Association [brayskateboardingassociation@gmail.com]

Sent: To: 14 September 2017 22:12 Planning - Plan Review

Subject:

Bray Municipal District Local Area Plan 2017

Attachments:

On behalf of the Bray Skateboarding Association.pdf

Please open pdf, if it doesn't work below is also suitable.

On behalf of the Bray Skateboarding Association (BSA) and its members, we would like to make a submission for the need of a skatepark in Bray. This has been a campaign that helped form the BSA while the idea has been campaigned a lot longer than the BSA's existence.

A brief Perspective from the BSA

Obesity and Mental Health

Minister for health, Simon Harris has stated in 2016 "In recent years, levels of obesity have increased dramatically with 60% of adults and one in four children in Ireland either overweight or obese". 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.

Low political risk of the youth and the effects on obesity and depression.

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 have 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. 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 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.

Skateboarding as an Olympic Sport

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.

SA's goals for having a skatepark

- 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

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.

We are hoping to setup something similar to the structure of Malmo's skateboard scene (Sweden). What is seen below is an official from the Malmo parks department and following that is a video of the head of the skateboard school also in Malmo.

https://vimeo.com/189642252

https://vimeo.com/176743262

Proposed location

The most recent location that has been proposed to the BSA was of the space next to the south harbour wall, north of the promenade. This would be a very ideal location as there are many passers-by. This would help avoid anti-social behaviour but also help promote the sport and entertain those who wish to watch. Having access for observers will also help retain participation numbers while also helping attract new skateboarders. The BSA would very much be in favour of this location provided the correct experienced skatepark builder ensues.

Conclusion

Please consider the large potential a skatepark could have on the community of Bray. More amenities, more events, more tourism and more options for the youth. A skatepark can bring so many people together whom would not otherwise cross paths.

Regards,

Bray Skateboarding Association

Rob Moss

Alan Collins

Paul Fitzgerald

Bray Skateboarding Association Find us on Facebook



On behalf of the Bray Skateboarding Association (BSA) and its members, we would like to make a submission for the need of a skatepark in Bray. This has been a campaign that helped form the BSA while the idea has been campaigned a lot longer than the BSA's existence.

A brief Perspective from the BSA

Obesity and Mental Health

Minister for health, Simon Harris has stated in 2016 "In recent years, levels of obesity have increased dramatically with 60% of adults and one in four children in Ireland either overweight or obese". 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.

Low political risk of the youth and the effects on obesity and depression.

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 have 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. 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 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.

Skateboarding as an Olympic Sport

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

BSA's goals for having a skatepark

how it creates a skatepark.

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

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.

We are hoping to setup something similar to the structure of Malmo's skateboard scene (Sweden). What is seen below is an official from the Malmo parks department and following that is a video of the head of the skateboard school also in Malmo.

https://vimeo.com/189642252

https://vimeo.com/176743262

Proposed location

The most recent location that has been proposed to the BSA was of the space next to the south harbour wall, north of the promenade. This would be a very ideal location as there are many passers-by. This would help avoid anti-social behaviour but also help promote the sport and entertain those who wish to watch. Having access for observers will also help retain participation numbers while also helping attract new skateboarders. The BSA would very much be in favour of this location provided the correct experienced skatepark builder ensues.

Conclusion

Please consider the large potential a skatepark could have on the community of Bray. More amenities, more events, more tourism and more options for the youth. A skatepark can bring so many people together whom would not otherwise cross paths.

Regards,

Bray Skateboarding Association

Rob Moss

Alan Collins

Paul Fitzgerald



Leonora Earls

From:

Bray Tidy Towns [braytidytowns@gmail.com]

Sent:

11 September 2017 21:52

To:

Planning - Planning and Development Secretariat

Subject:

ACA Submissions for Bray Municipal District Local Area Plan 2017-2023

Attachments:

PROPOSAL(2) (2) 010517.pdf; Proposal11thNov2016 11.20.pdf; PROPOSAL(3)Single

for WCC.pdf; Letter to WCC 040917.docx

Dear Sir/Madam,

Herewith attached covering letter and three ACA submissions for the above.

Regards

Mary

Bray Tidy Towns
1 Alexandra Terrace
Novara Avenue
Bray
Co. Wicklow

(Chair)

Mimi Megannety: 086 6995065

(Secretaries)

Mary-Anne Parsons: 0872868011 and

Mary Hargaden: 0872104844

(Treasurer)

Leah Kinsella: 087 2266613

Dear Sir/Madam,

Re: Bray Municipal District Local Area Plan 2017 - 2023: Architectural Conservation Area Plans submissions.

The attached three Architectural Conservation Area (ACA) proposals have already been lodged with Wicklow Co. Co. in respect of the request for submissions last year for the Bray Municipal District Local Area Plan 2017 – 2023 (BMDLAP2017-2023). These are:

- 1 Quinsboro Road, Florence Road and Eglinton Road.
- 2 Galtrim/Wyndham/Adelaide/Novara/Sidmonton and Meath Road.
- 4 Seafront

We had intended to submit No. 3 – being the area around the Town Hall; we may do this separately but we firstly want to consolidate the above submissions.

Bray Tidy Towns therefore, submits the same three proposals for ACA's in respect of the current request for submissions for the BMDLAP 2017-2023.

In this regard we have detailed below some of the reasons for these proposals:

OLD AND TROUBLESOME ISSUES SUCH AS SHOPFRONT NAMES AND SIGNAGE CAN BE GIVEN A FRAMEWORK

ACA's 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. In we are of the opinion that the Quinsboro Road in particular would benefit from a signage policy.

QUINSBORO ROAD

We firmly believe that the adoption of planning policies through an ACA for the Quinsboro Road would at least halt some of the neglect 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.

ACA MORE FLEXIBLE THAN PROTECTED STRUCTURE

• The building guidelines for ACA's 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.

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.

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- Brennans 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.

http://www.buildingsofireland.ie/niah/search.jsp?county=WI&name=Meath+Road&town=Bray&townland=&type=quick&page=2

OTHER AREAS IN WICKLOW WITH ACA'S

Currently Bray, unlike eight towns in Wicklow does not have any ACA's 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 ACA's for four separate areas including their Main Street. Other towns, which have ACA's are:

- o Blessington
- o Rathdrum
- o Tinahely
- o Greystones Four areas

- o Delgany
- o Dunlavin
- o Enniskerry

CONSOLIDATING ACA AREAS

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

http://www.buildingsofireland.ie/FindOutMore/Architectural%20Heritage%20Protection%20-

%20Guidelines%20for%20Planning%20Authorities%20(2011).pdf

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. The recommended building attributes detailed by BTT in the attached ACA proposals are only given as examples of areas requiring policies and guidelines, they are not meant as definitive recommendations in themselves.

Bray Tidy Towns would urge you to consider these ACA's as their coherence lies in the fact that Bray (the largest town in Wicklow) was developed because of the railway and became an important Victorian resort. Dargan provided the inspiration and in some cases the finance, for the building and development of the streets, roads, villas, parks and the original Seafront. This town as it was designed and built in the late 1800s and early 1900's is sustaining a population of over 36,000 and it arguably deserves a helping hand to ensure that it will continue to thrive as an urban population centre.

Yours truly

Mary Hargaden Joint Secretary Bray Tidy Towns



making a great town better **Bray Tidy Towns**

12th September 2017

WICKLOW COUNTY COUNCIL

1 2 SEP 2017

PLANNING DEPT.

Dear Sir/Madam,

Re: Bray Municipal District Local Area Plan 2017 - 2023: Architectural Conservation Area (ACA) submissions.

The enclosed three ACA proposals have already been lodged with Wicklow Co. Co. in respect of the request for submissions last year for the Bray Municipal District Local Area Plan 2017 – 2023 (BMDLAP2017-2023). These are:

- 1 Quinsboro Road, Florence Road and Eglinton Road.
- 2 Galtrim/Wyndham/Adelaide/Novara/Sidmonton and Meath Road.
- 4 Seafront

We had intended to submit No. 3 – being the area around the Town Hall; we may do this separately but we firstly want to consolidate the above submissions.

Bray Tidy Towns therefore, submits the same three proposals for ACA's in respect of the current request for submissions for the BMDLAP 2017-2023. In this regard we have detailed below some of the reasons for these submissions:

OLD AND TROUBLESOME ISSUES SUCH AS SHOPFRONT NAMES AND SIGNAGE CAN BE GIVEN A FRAMEWORK

ACA's 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. In we are of the opinion that the Quinsboro Road in particular would benefit from a signage policy.

QUINSBORO ROAD

We firmly believe that the adoption of planning policies through an ACA for the Quinsboro Road would at least halt some of the neglect 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.

ACAs MORE FLEXIBLE THAN PROTECTED STRUCTURE DESIGNATION

1

The building guidelines for ACA's 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.

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.

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:

- O 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—Brennans Parade 14 houses, Marine Terrace four houses, Fitzwilliam/Marlborough Tce - eight houses, Bray Coastguard Station - six cottages (currently involved with a planning application which is under review 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.
 http://www.buildingsofireland.ie/niah/search.jsp?county=WI&name=Meath+Road&town=Bray&townland=&type=quick&page=2

OTHER AREAS IN WICKLOW WITH ACA'S

Currently Bray, unlike eight towns in Wicklow does not have any ACA's 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 ACA's for four separate areas including their Main Street. Other towns, which have ACA's are:

- Blessington
- o Rathdrum
- o Tinahely

- o Greystones Four areas
- o Delgany
- o Dunlavin
- o Enniskerry

CONSOLIDATING ACA AREAS

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

http://www.buildingsofireland.ie/FindOutMore/Architectural%20Heritage%20Protection%20-%20Guidelines%20for%20Planning%20Authorities%20(2011).pdf

CONCLUSION

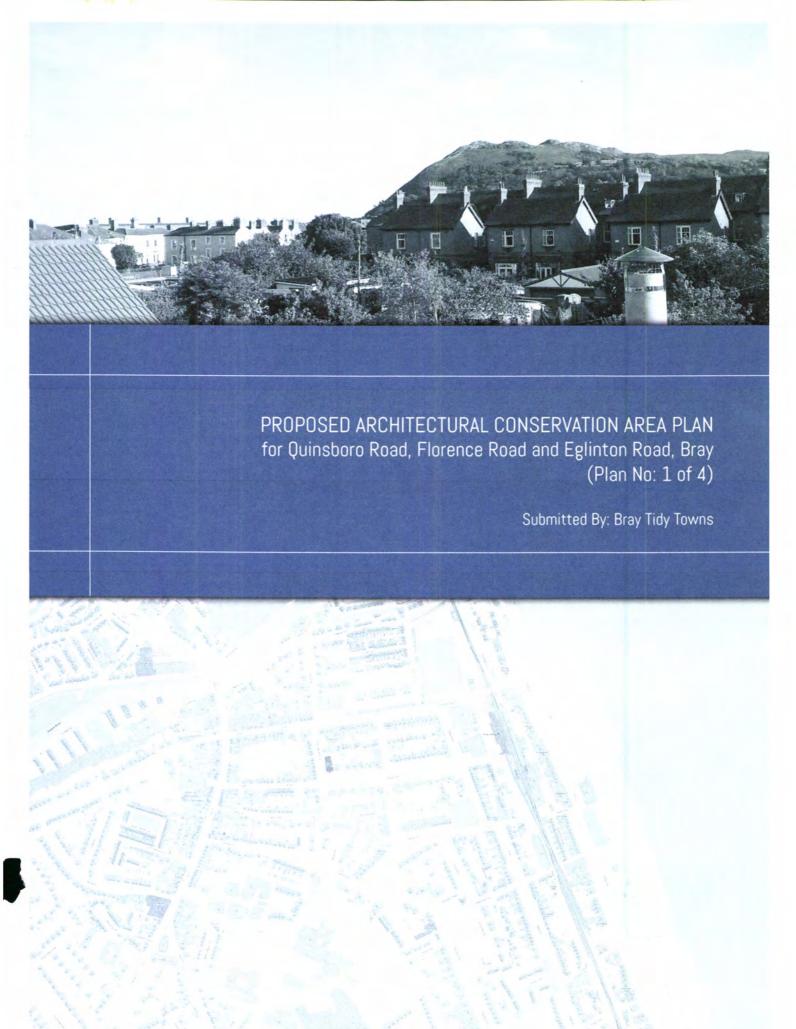
Bray Tidy Towns feel that the ACA is a planning tool to be used by planners to ensure that they can have greater influence on how an area develops. The recommended building attributes detailed by BTT in the attached ACA proposals are only given as examples of areas requiring policies and guidelines, they are not meant as definitive recommendations in themselves.

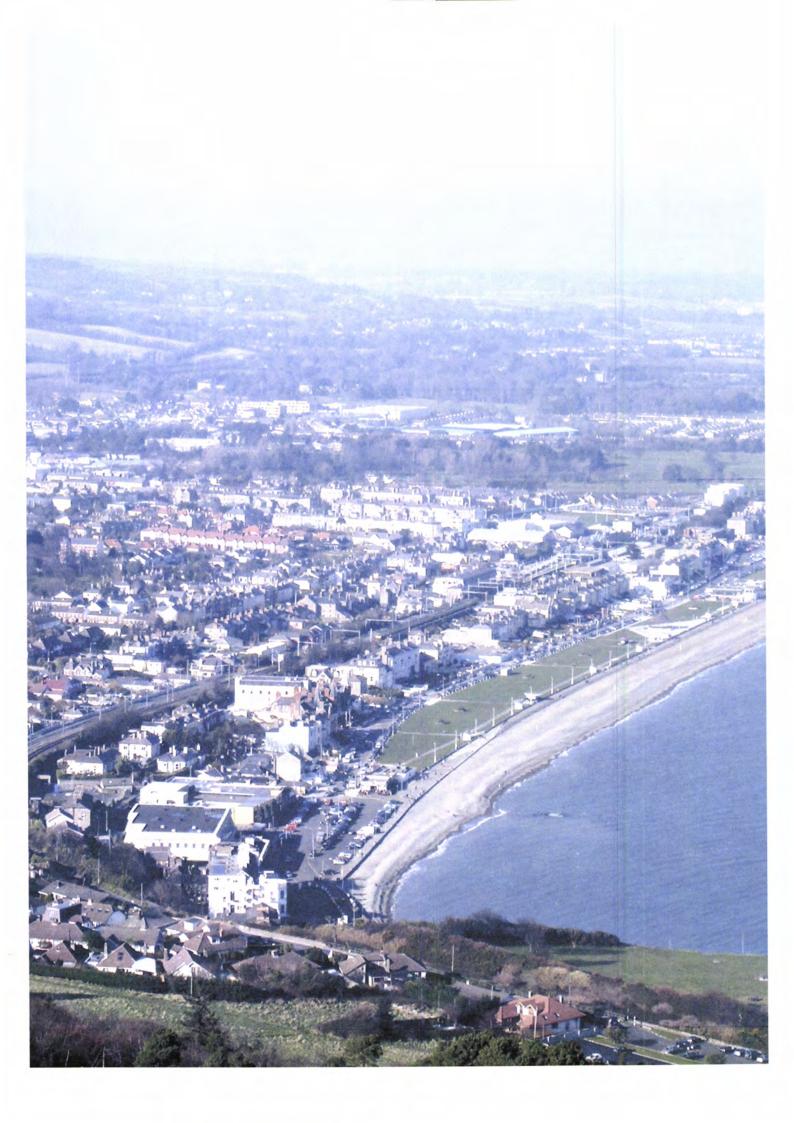
Bray Tidy Towns would urge you to consider these ACA's as their coherence lies in the fact that Bray (the largest town in Wicklow) was developed because of the railway and became an important Victorian resort. Dargan provided the inspiration and in some cases the finance, for the building and development of the streets, roads, villas, parks and the original Seafront. This town as it was designed and built in the late 1800s and early 1900's is sustaining a population of over 36,000 and it arguably deserves a helping hand to ensure that it will continue to thrive as the ninth largest urban population centre in Ireland.

Yours truly

Mary Hargaden Joint Secretary

Bray Tidy Towns





Contents

Introduction
Proposed Architectural Conservation Area Map
Historic Development
Character of the proposed Architectural Conservation Area (ACA)
1 List of Protected Structures
2 Building sequence
3 Characteristics of Prince of Wales, Goldsmith, Duncairn and Florence Terraces/Eglinton Road
4 Architects
5 Setting
Problems and Pressures
Objectives
. Appendix 1
Appendix 2 Existing designations

Introduction

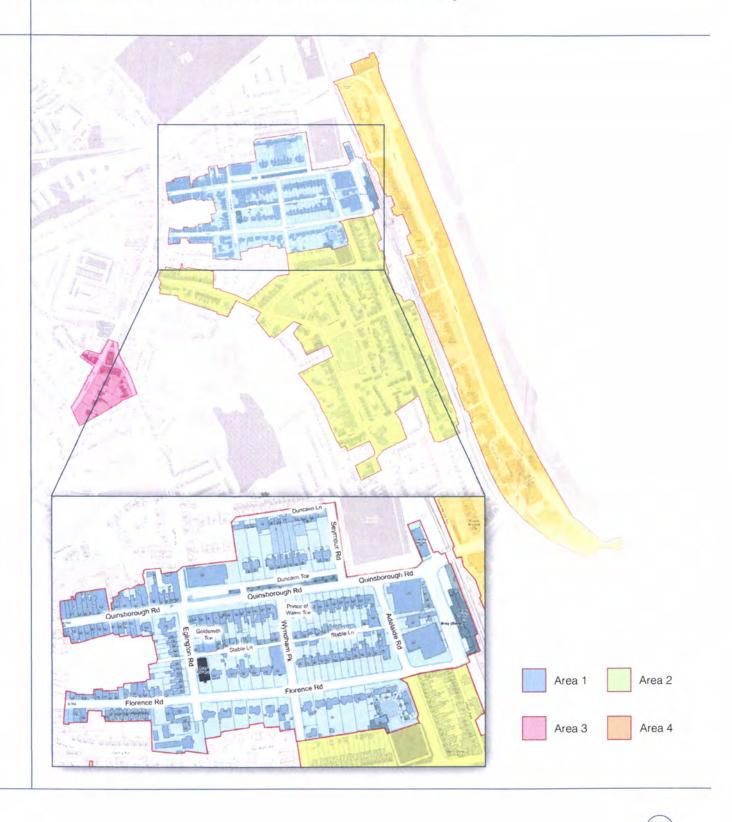
Several towns in Wicklow have ACAs and it is thought timely that Bray, given its size and unique history, should have areas within the town protected by Architectural Conservation Area status. The area under consideration was developed in Victorian times and contains many examples of well designed buildings by impressive, nationally accredited architects and engineers of the Victorian era.

The construction of the railway from Dublin to Bray led to extensive development in Bray, which was until then an unimportant market town and small bathing resort. The coming of the railway sparked off a massive building boom which turned the town into a major seaside resort and commuter town for Dublin. Architecturally important terraces and houses were built along new roads using the most competent architects of the time. The entrepreneurs responsible for building the railway and for financing the building boom in Bray included the notable railway engineer William Dargan (1799¬–1867) and local businessmen John Quin Junior, Edward Breslin and John Brennan. Quin supplied the land allowing the Dublin and Wicklow Railway Co. to lay out Quinsborough Road and Dargan laid out the seafront and provided structures on Quinsborough Road.

As was fashionable at the time three very grand rows of houses were erected along Quinsborough Road, which rivalled the town houses of Dublin: Dargan (now Duncairn) Terrace built c. 1859, Prince of Wales Terrace built c. 1860 and Goldsmith Terrace built c. 1863.



Proposed Architectural Conservation Areas - Bray



Historic Development

Quinsborough Road was laid out in 1854 by the Dublin and Wicklow Railway Co. under William Dargan: he also laid out the first Bray Promenade at his own expense in 1859.

The Quin family stipulated that the railway company undertake to build the Quinsborough Road. It was designed to be 40 feet wide at the west end from the main street as far as Eglinton Road and 50 feet wide from there to the railway level crossing. The west end was not developed as early as the wider end. On the north side of Quinsborough Road, Westbourne Terrace was built by 1870 and the houses were set back from the road with front gardens which were built over in the 20th century to provide street-front commercial premises.



NLI - Duncairn Terrace, Bray, Co. Wicklow by French, Robert, 1841-1917 photographer Published / Created: [between ca. 1865-1914]. - Lawrence Collection

Character of the proposed Architectural Conservation Area (ACA)

1. LIST OF PROTECTED STRUCTURES IN THE ACA:

1/12 PRINCE OF WALES TERRACE

1/12 GOLDSMITH TERRACE

1/10 DUNCAIRN TERRACE

ST. ANDREWS PRESBYTERIAN CHURCH

FORMER MANSE OF ST. ANDREWS CHURCH

NO. 15 GOLDSMITH TERRACE (LAWLOR'S PHARMACY)

NO. 9 QUINSBORO RD.

BRAY POST OFFICE

1/13 FLORENCE TERRACE

ARNO FLORENCE ROAD

COLAISTE RAITHIN - FLORENCE ROAD

1-11 EGLINTON ROAD (INCLUDING NOS. 1-5 LONGFORD TERRACE)

CARNEGIE - BRAY PUBLIC LIBRARY - EGLINTON ROAD

METHODIST CHURCH

See profiles of the Protected Structures in Appendix 1.

2. BUILDING SEQUENCE

The railway was built in 1854, St. Andrew's church was built in 1858, and the terraces of houses were built in the following sequence: Duncairn Terrace (previously Dargan Terrace) c. 1859, Prince of Wales Terrace c. 1860, Goldsmith Terrace c. 1863. The Methodist Church on the corner of Eglinton Road and Florence Road was built in 1864. Eglinton Road and Florence Terrace were built c. 1870. The Post Office was built in 1905 and the Carnegie Library in 1910.

3. CHARACTERISTICS OF PRINCE OF WALES, GOLDSMITH, DUNCAIRN AND FLORENCE TERRACES / EGLINTON ROAD

ORIGINAL BUILDING FEATURES AND MATERIALS INCLUDE:

- · Uniform terraces with matching features
- Decorative wrought iron railings and gates
- Cast-iron rainwater goods
- Decorative wrought-iron balconies
- Slate hipped roofs sometimes behind parapets
- Granite stone steps
- Entrances, consisting mainly of panelled timber doors, sometimes flanked by pairs of moulded jambs with decorative console brackets, set within projecting porticos with lonic columns, corner pilasters.
- Openings with decorative moulded surrounds with semi-circular fanlights
- Segmental pediments in brackets above windows
- Simpler copice like hoods on brackets above windows
- · Brick and granite details including guardrails
- Timber doors with plain segmental fanlights
- · Jambs with decorative brackets
- Timber sash framed windows
- Granite window sills
- Bay windows
- Windows with decorative wrought-iron security grills
- Full height gabled bays forming symmetrical "palace fronts" in the case of some Florence Terrace
- Apart from the redbrick houses some are finished in unpainted limed render
- Moulded quoins surrounding openings
- Terracotta tiling at entrances/porches.

CHARACTERISTICS OF SOME OTHER BUILDINGS IN THIS ACA INCLUDE:

Carnegie Library on the corner of Eglinton and Florence Road, built in locally sourced granite (Glencullen) with many of its original features intact. Laid out tastefully back from the road and on the same line as other houses and buildings in Eglinton Road and Florence Road.



NLI -St. Andrew's Church by French, Robert, 1841-1917 photographer Published / Created: [between ca. 1865-1914]. Lawrence Collection

ST. ANDREW'S CHURCH - QUINSBORO ROAD:

- · Granite with clasping and diagonal buttresses
- Slated roof with crenellated granite parapets
- · Pitched arch timber door with strap hinges
- · Arch-headed windows with stone tracery and moulded drip stones
- · Area of planting enclosed by decorative cast-iron railings and carriage gateway

METHODIST CHURCH AND MANSE - FLORENCE ROAD:

- Built of granite rubble with sandstone dressings
- Gothic arched opening with pointed arch windows geometric tracery with sandstone surrounds.
- Rose window
- Double sheeted timber doors
- Wrought-iron railings
- Natural slate, granite chimneys with clay pots.

4. ARCHITECTS

Many acclaimed architects worked on the infrastructure of Bray in Victorian times and later and these include the following:

STRUCTURE	ARCHITECTS
Prince of Wales Tce. and Florence Tce.	Lanyon and Lanyon.
Duncairn Tce.	George Wilkinson designed Bray Greystones and Dalkey railway stations among others.
Post Office	Robert Cochrane who designed many other post offices and coastguard stations.
Carnegie Library	John C. Wilmot resident of Bray who also designed houses in Galtrim Road.
Methodist Church	A.G. Jones who designed the famous wall, chained railings and entrance gates for Earlsfort Terrace Exhibition Palace and Winter Garden (National Concert Hall).
St. Andrew's Church	W.J. Barre church designer in Northern Ireland.
Florence Road - Up to Eglinton Road.	John Ryan railway engineer worked in US and Ireland. Also worked on Duncairn Tce. houses.

5. SETTING

The Quinsborough Road was conceived and built in Victorian times to serve the seafront, the railway station and the Main Street. This road, together with the adjacent Eglinton and Florence Roads, was built to service a thriving seaside and railway town, which was imaginatively and competently planned.

The street width, the trees and design are intrinsic to the amenity and character of Quinsborough Road. Mature trees are planted in a line in front of Duncairn Terrace providing diversity, and there is a line of well-planted trees on the footpaths alongside Prince of Wales Terrace and both sides of the Main Street end of the Quinsborough Road.

The uniform proportions of groupings of houses and their front gardens create pleasing views from the roadways included in the proposed ACA. The churches together with their well tended gardens and settings provide pleasant features on the Quinsborough, Florence and Eglinton Roads.

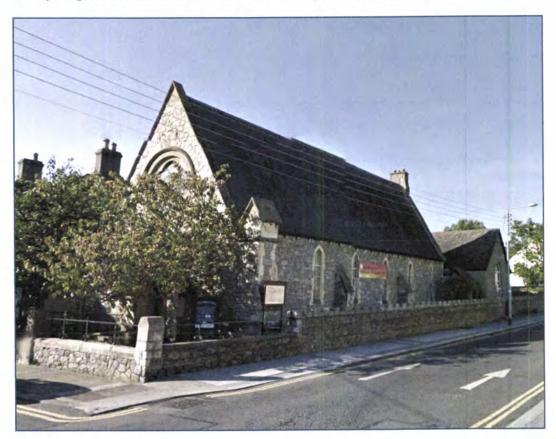


Prince of Wales Terrace.
According to NIAH this building "is still largely intact, which along with Duncairn Terrace and Goldsmith Terrace, makes Quinsborough Road Bray's most impressive thoroughfare."

The Buildings of Ireland (NIAH) survey carried out by The Department of Arts Heritage and the Gaeltacht http://www.buildingsofireland.ie/Surveys, has much to say about these Victorian terraces in Bray. It says "The Prince of Wales Terrace in particular, possesses a mid Victorian splendour to equal contemporary terraces in London." It also says "this Victorian Terrace is one of Bray's most complete and most impressive 19 c. groupings".

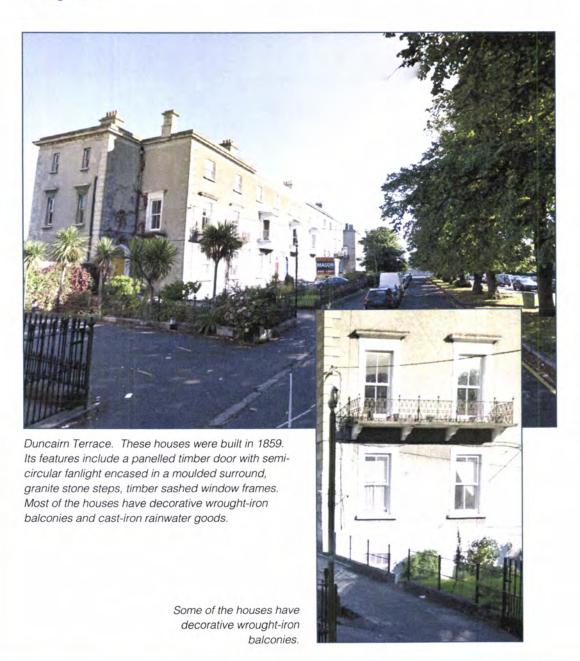
"Quinsborough Road is undoubtedly the most architecturally impressive of Bray's main thoroughfares, largely due to its three grand, late 1850s/early 1860s terraces."

The Methodist Church and Manse "has been well preserved and combined with the group value of the adjoining manse it adds much to both the streetscape and the historic character of the area".

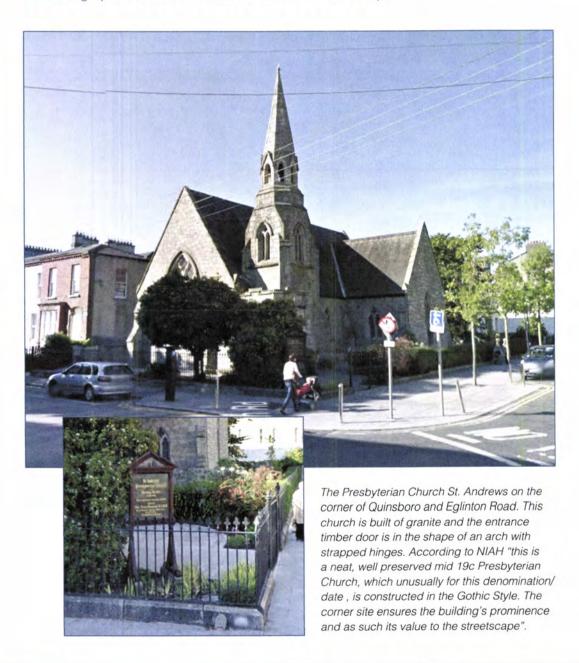


This Methodist Church, on the corner of Florence Road and Eglinton Road, was built in 1864 from granite rubble with sandstone dressings. According to NIAH it is "well preserved and combined with the group value of the adjoining manse it adds much to both the streetscape and the historic character of the area".

Duncairn Terrace - According to NIAH this group of houses "along with the contemporary Prince of Wales Terrace and Goldsmith Terrace makes Quinsborough Road Bray's most impressive thoroughfare".



St. Andrew's Church "is a neat, well preserved mid 19th century Presbyterian church, which, unusually for this denomination/date, is constructed in the Gothic Style. The corner site ensures the building's prominence and as such its value to the streetscape".



Goldsmith Terrace (below) - Quinsborough Road is undoubtedly the most architecturally impressive of Bray's main thoroughfares, largely due to its three grand late 1850s / early 1860s terraces. Of the three Goldsmith Terrace is the most altered, all bar two of the properties having been given over to commercial use, with many unsympathetic shop fronts inserted and front gardens lost; however the Regency style grandeur of the row is still evident and the terrace continues to make an important contribution to the streetscape.



Eglinton Road Nos. 1–8 are "one of the most complete mid to later Victorian Terrace groupings in the whole of Bray". Nos 9–11 are houses "whose restrained, dignified air contributes much to the streetscape".





Nos. 6/7 Longford Tce. Eglinton Road. These houses were built c 1865. The facade is finished in brick with decorative eaves course. (Terracotta tiles at entrance above). The granite stone steps are a feature together with the original railings and guardrails. According to NIAH the west side of Eglinton Road is "one of the most complete mid to later Victorian groupings in the whole of Bray. (These houses are now in a very dilapidated condition).

Problems and Pressures

Over the years there have been a number of developments of shop-fronts and mixed-use commercial developments which have negatively impacted on the Quinsborough Road in particular. While the listings of a protected structure protects the immediate building, it is critical that a cohesive approach is taken to the design of this road along with the Florence and Eglinton Roads in order to ensure that the formality of the road is maintained.

ISSUES INCLUDE:

- Signs including illuminated projecting and non-projecting signage, down-lighters, neon signs and large window graphics erodes the uniform appearance of Quinsborough Road (see below).
- Buildings at the Westbourne Terrace end of Quinsborough Road are uninhabited, accessible, subject to illegal dumping and a health and safety issue. These need to be boarded up.
- Although Goldsmith Terrace still has characteristics of well-designed buildings, additions to the fronts
 of the buildings need to be monitored.
- Small incremental changes can quickly erode the appearance of historic buildings. In particular the
 use of uPVC windows/door frames.
- Bin-storage, necessitated by sub-divided units, leads to deterioration of visual appearance.
- Porches, extensions, roof alterations need to take into consideration the historic nature of the area.
- Electrical and Telecoms cables litter the facades of many of the buildings.











Objectives

It is desired that guidelines for development will carry significant weight in determining applications for planning permission within the ACA. Possible outcomes of submitting an ACA include:

- Encouraging the retention of original features such as roof coverings, wall renders, windows, doors, railings, trees, streetscapes, gardens.
- To ensure that any developments, modifications, alterations or extensions affecting a structure within an ACA comply with planning standards and are sited/designed appropriately.
- Encouraging the removal of redundant modern signage which detract from the visual quality of the streetscapes.



Appendix 1 - Profiles of Protected Structures

In most cases details of the architects responsible for the design of buildings was sourced from the Dictionary of Architects in Ireland http://www.dia.ie/. Details of the characteristics of the buildings was sourced from the Building Survey of Ireland - National Inventory of Architectural Heritage

http://www.buildingsofireland.ie/Surveys/Buildings/

1/12 Prince of Wales Terrace

1/12 Goldsmith Terrace

1/10 Duncairn Terrace

St. Andrews Presbyterian Church

Former Manse of St. Andrews Church

No. 15 Goldsmith Terrace (Lawlor's Pharmacy)**

No. 9 Quinsboro Rd.**

Bray Post Office

1/13 Florence Terrace

Arno Florence Road**

Colaiste Raithin - Florence Road**

1-11 Eglinton Road (Including Nos. 1-5 Longford Terrace)

Carnegie - Bray Public Library - Eglinton Road

Methodist Church

Structure, including interior, gates and railings. Ref No. 68

Structure and railings. Ref No. 72

Structure and railings. Ref No. 73

Structure and interior. Ref No. 69

Structure. Ref No. 69

Façade. Ref No. 74

Structure. Ref No. 70

Structure. Ref No. 65

Structure and railings. Ref No. 14

Structure. Ref No. 16

Façade, external walls and roof. Ref No. 17

Structure. Ref No. 11

Structure. Ref No. 12

Structure and interior. Ref No. 15

^{**} Profiles not included

QUINSBORO ROAD, 1-12 PRINCE OF WALES TERRACE. REF NO. 68

The "twelve Italiante houses" on Prince of Wales Terrace were designed in 1860 by Lanyon, Lynn and Lanyon, important architects of the mid 1800's. These architects were also responsible for other work in Bray including those in Florence Tce, Ardmore House and also built a number of other houses for Dargan. They also completed drawings for Edward Breslin, another developer at that time in Bray. Prince of Wales Terrace "has been described by a modern architectural writer as a splendid example of Victorian town development and a monument to 19c confidence, and so it remains". According to NIAH this is still a "largely intact, terrace, which along with the contemporary Duncairn Terrace and Goldsmith Terrace, makes Quinsboro Road Bray's most impressive thoroughfare".

QUINSBORO ROAD, 1-12, GOLDSMITH TERRACE. REF NO. 72

This was built by 1863 but unlike the Prince of Wales Terrace it is in commercial usage. And is absent of enclosed front gardens at most properties. According to NIAH of the three terraces in Quinsboro Road "this is the most altered, all bar two of the properties having been given over to commercial use, with many unsympathetic shopfronts inserted and front gardens lost; however the Regency style grandeur of the row is still evident and the terrace continues to make an important contribution to the streetscape".

QUINSBORO ROAD, 1-10 DUNCAIRN TERRACE (PREVIOUSLY DARGAN TERRACE). REF NO. 73

At least four of the houses in Duncairn Terrace, were designed for William Dargan, by the famous architect, George Wilkinson who designed many railway stations in Ireland including Bray, Greystones, Dalkey and Wicklow. He was responsible for the design of the station-masters house which currently lies in ruins. He also designed the Royal Marine Hotel for Edward Breslin. These are semi-detached three storey over basement houses built in 1859 as part of a planned, part terraced, part semi-detached development of ten houses. There are decorative wrought-iron balconies to the first floor and each has cast-rion rainwater goods. Similar to the other house built nearby they face on to the road but are separated from the road by a relatively large garden, they are enclosed by decorative cast-iron railings with matching gates.

According to NIAH "this large mid-Victorian residence is part of a grand, still largely intact grouping of similar houses, which, along with the Prince of Wales Terrace and Goldsmith Terrace, makes Quinsboro Road Bray's most impressive thoroughfare".

QUINSBORO ROAD, ST. ANDREW'S PRESBYTERIAN CHURCH AND MANSE REF NO. 69

St. Andrews Presbyterian Church, was designed by William J. Barre in 1858. Most of Barres work was carried out in the Northern counties and he lived in Newry and Belfast. He is also responsible for the Church of Ireland church at Kilbride.

QUINSBORO ROAD, THE POST OFFICE. REF NO. 75

The Post Office was built in the 'New Dutch Renaissance style' according to the Irish Dictionary of Architects. The Post Office was designed in 1905, by Robert Cochrane, who designed a large number of Post Offices throughout Ireland including ones in Ennis, Belfast, Armagh, Newry Birr and Omagh. He also built quite a number of coastguard stations including ones at Fenit, Dingle and Bunbeg.

FLORENCE TERRACE NOS. 1-13

Like the Prince of Wales Tce, on the Quinsboro Road, the houses on Florence Terrace, were built by the architects, Lanyon Lynn and Lanyon. According to NIAH these are a relatively uniform but non-identical row of thirteen two storey over basement houses built c 1870. Many of the original features remain including the stone steps, timber doors with sidelights, timber jambs with decorative brackets and plain semi-circular fanlights. Most have timber frames. Some windows have decorative wrought-iron security 'grills'. Most have cast-iron rainwater goods. According to NIAH this is a Victorian terrace and one of "Bray's most complete and most impressive 19c groupings".

EGLINTON ROAD 1-8

Similar to Nos. 9-11 however NIAH states that these houses make the west side of Eglinton Road "one of the most complete mid to later Victorian terrace groupings in the whole of Bray".

EGLINTON ROAD NOS. 9-11

These are two-storey over basement houses built in a uniform row c1870. According to NIAH "The front façade is finished in brick and granite with a decorative brick eaves course" Each has a flight of stone steps with a plain segmental fanlight. The houses front onto the street but is separated from it by a garden enclosed by "rendered wall topped with cast-iron railings". NIAH states these are houses "whose restrained, dignified air contributes much to the streetscape".

BRAY PUBLIC LIBRARY

This is a Carnegie Library built in 1910 from a grant of £2,000 given by Andrew Carnegie. John C. Wilmot was the architect, he also designed houses at Galtrim Road and the Northern Bank façade on the Quinsboro Road. He died at his residence at No. 3 Galtrim Road in 1912. The Granite used to build the library was from Glencullen and this stone was dressed in Glencree. It was built by A. Hull.

METHODIST CHURCH

This church was built in 1864 of granite rubble and sandstone dressings. The double sheeted timber doors are set in a gothic arched opening set within a porch. There is a large rose window above this door. The window openings are pointed-arched with geometric tracery and sandstone surrounds. The roof is of natural slate and cast-iron rainwater goods. This church was designed by A.G. Jones who built several Methodist Churches around Dublin, including one at Silchester Road Dunlaoghaire.

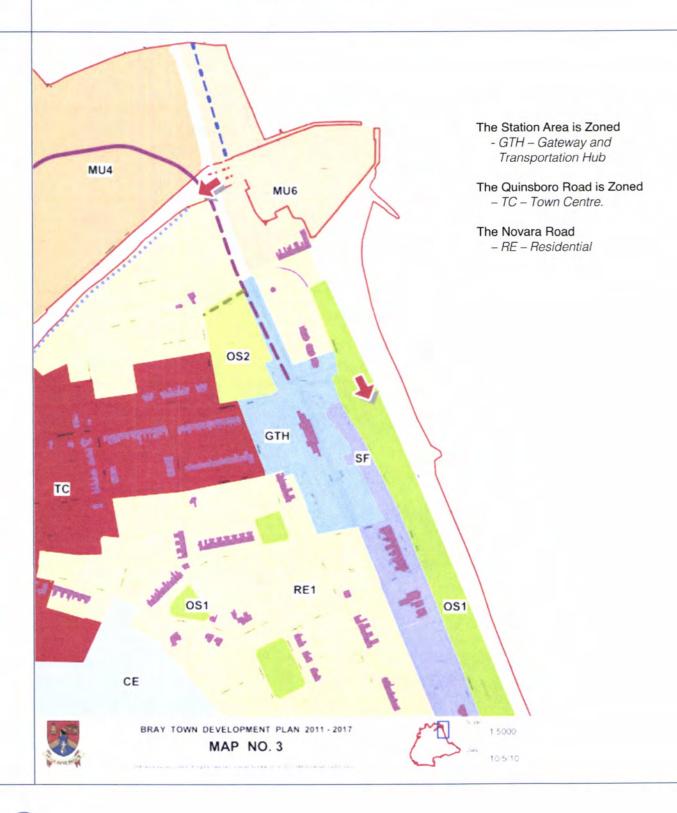
BRAY RAILWAY STATION. NOT ON PROTECTED STRUCTURE LIST

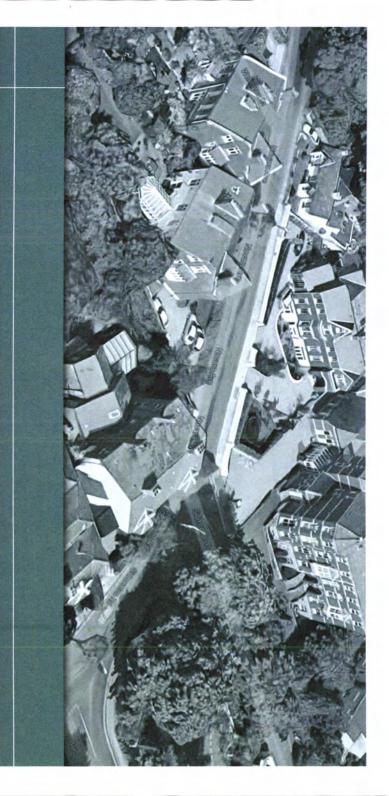
The famous architect of workhouses George Wilkinson built the Bray Railway Station in 1852 along with other stations including those in Dalkey, Killiney, Dundrum, Greystones and Wicklow. Up until this time he had designed up to two hundred workhouses. His works include buildings at Phoenix Park and the Agricultural Hall at the RDS. In Bray he also built the Royal Marine Hotel, Duncairn Terrace Houses and the Station Master's House.

NORTHERN BANK. NOT ON PROTECTED STRUCTURE LIST.

The Northern Bank was designed in 1890 by George P. Beater who worked on many commercial premises in Dublin including Arnotts, Elverys and Bewleys Henry Street, which was destroyed during 1916. He also worked on the entrance porch to the Nelson Monument in O'Connell Street.

Appendix 2 - Existing Designations/Zonings

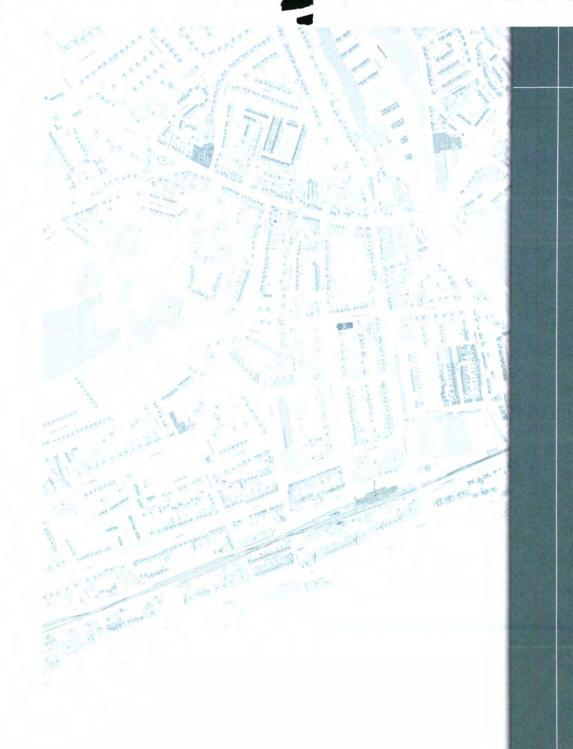


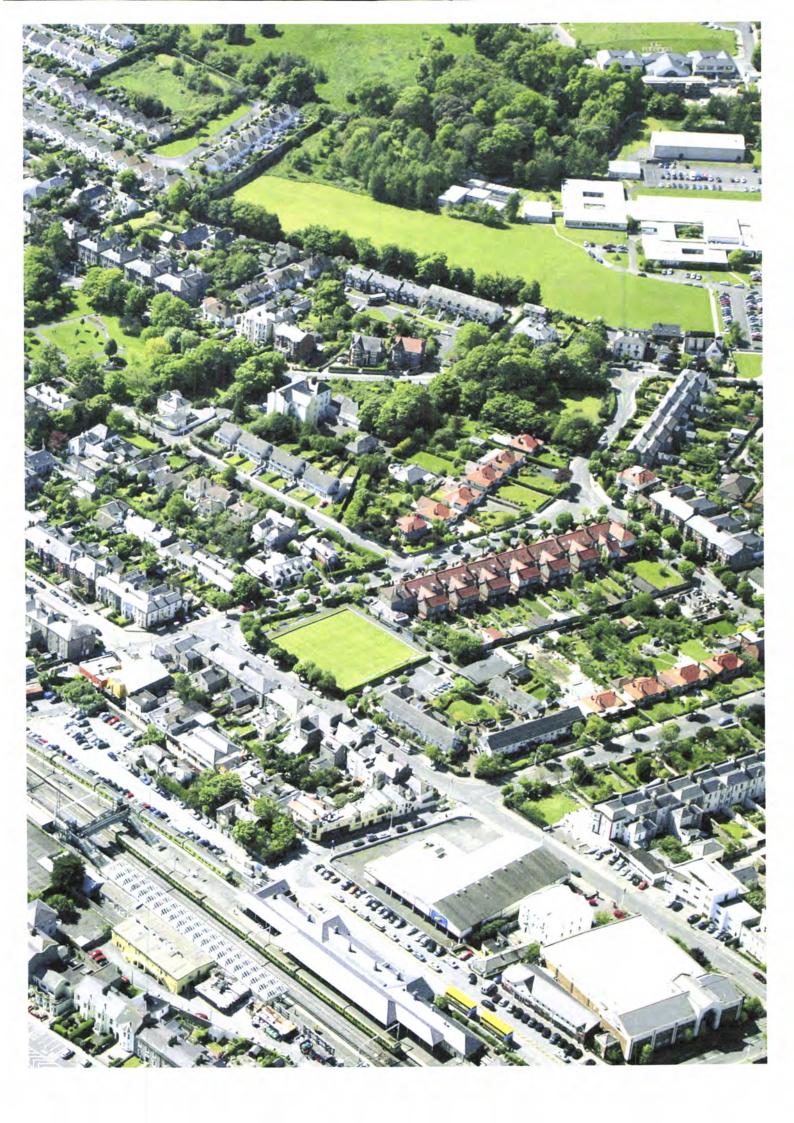


PROPOSED ARCHITECTURAL for Galtrim Road, Wyndham Park, Adelaide Road L CONSERVATION AREA PLAN

Novara Avenue, Sidmonton and Meath Road Bray (Plan No: 2 of 4)

Submitted By: Bray Tidy Towns





Contents

Introduction	2
Proposed Architectural Conservation Areas - Map	3
Historic Development	4
Character of the Proposed Architectural Conservation Area (ACA)	5
1 List of Protected Structures	5
2 List of Surveyed Structures not on the Protected Structure List	6
3 Characteristics of Houses in the Proposed ACA area	7
3 (a) Specific Characteristics of other Houses in the Proposed area	9
Street-scape Settings and Features	10
Open Space Private and Public	13
Problems and Pressures	14
Objectives	15
Appendix (A) Profiles of Protected and Unprotected Structures	16
Appendix (B) Existing Designations/Zoning	25

Introduction

This is the second of four ACA submissions detailed on the attached Map at Appendix 3. As with the ACA submission for Quinsborough Road, Eglinton Road and Florence Road, this area was developed in Victorian times and contains many examples of well designed buildings by impressive, nationally accredited architects and engineers of the Victorian era.

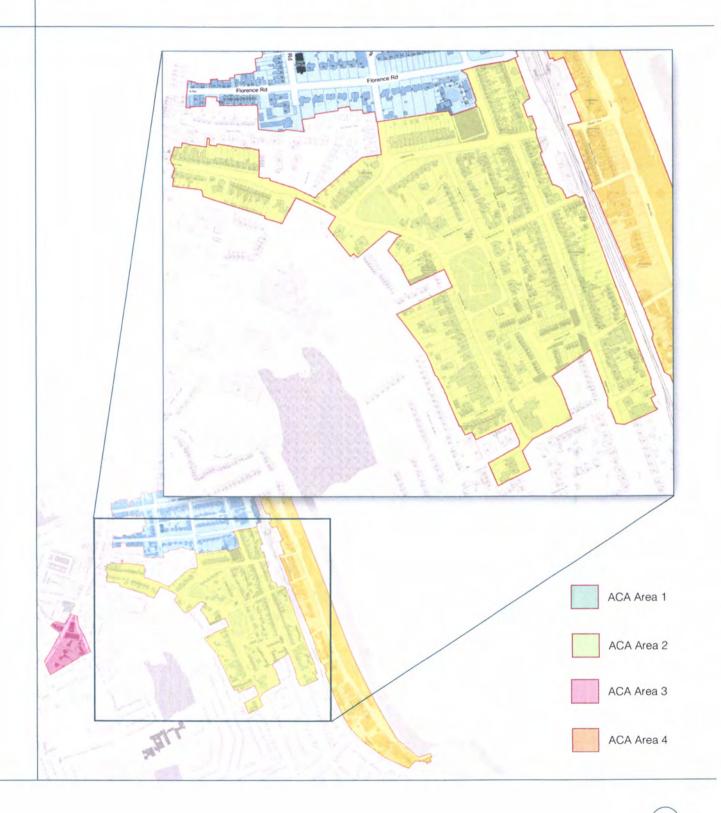
The population of Bray in 1841 before the arrival of the railway in 1854 was 3,169 and with the spurt of house-building which took place after 1854, by 1861 the population had grown by 325% to 4,182. From 1861 to 1901 the population grew to 7,424. In other words the population doubled in 60 years.

Until the railway was constructed, Bray was an unimportant market town and small bathing resort. The coming of the railway sparked off a massive building boom which turned the town into a major seaside resort and commuter town for Dublin. Sea air was regarded as healthy and therefore many Dublin families moved to Bray for the Summer and many houses were rented. These Victorian houses in Bray were rented by people who did not have to travel into Dublin every day. Houses similar to those in Milward Tce. can be found in many Dublin suburbs including Rathmines. Similar houses to the two storey terraced houses can also be found in suburbs including those in Sth. Circular Road.

As was fashionable at the time many terraces, mainly redbrick, were erected along the Galtrim, Novara, Sidmonton and Meath Roads similar to other terraces which were built in other parts of the country but particularly in Dublin at the time.



Proposed Architectural Conservation Areas - Bray



Historic Development

The Quinsboro Road, was laid out in 1854, by the railway entrepaneur William Dargan who built the Bray to Dublin railway: he also laid out Bray Promenade at his own expense in 1859. As an able building contractor he built a number of roads including Dublin to Howth and Dublin to Blessington. He attracted a number of investors and architects to Bray including the famous George Wilkinson who designed the Bray Railway Station.

The town grew steadily in the fifteen years following the arrival of the railway indicated by the development, of the Quinsboro Road, its terraces, the two hotels the Royal Marine and the International, the Methodist Church 1859, the Presbyterian Church in 1860, Christchurch in 1863 and the Turkish Baths in 1859. The Florence Road followed and by 1860 other residential areas such as Sidmonton Square and Novara Avenue were being developed. In 1857 a Town Commission was established, which was responsible for lighting, water supply and paving. Before 1854 according to Davies¹ there was "no lighting supply of any kind; paraffin lamps and candles were still the order of the day, even though Dublin had had gas street lighting since 1825".

Bray continued to expand through the late nineteenth and early twentieth centuries in contrast to the majority of Irish towns, which ceased to grow by the end of the 19c. To emphasise the importance of Bray the famous architectural practice of Thomas Newenham Deane & Son designed a 'grand Town Hall' paid for by the Brabazons ² (benevolent landlords of the greater part of the township of Bray)



NLI - Wyndham Park and corner of Galtrim Road Bray, Co. Wicklow by French, Robert, 1841-1917 photographer

Character of the proposed Architectural Conservation Area (ACA)

1. LIST OF PROTECTED STRUCTURES IN THE ACA:

1-7 WYNDHAM PARK

1-14 GALTRIM ROAD

1-8 WAVERLEY TERRACE, ADELAIDE ROAD*

1/7 NOVARA TERRACE

NOVARA AVENUE - BRAY PAROCHIAL HALL INCLUDING HOUSE

NOVARA AVENUE - FERNDALE

NOVARA AVENUE - WELLINGTON

NOVARA AVENUE -SIDMONTON COTTAGE*

NOVARA AVENUE - LAXTON

NOVARA AVENUE - NOVARA HOUSE

1/6 SIDMONTON SQUARE

SIDMONTON PLACE - TONER HOUSE (FRENCH SCHOOL)

MEATH ROAD - 1/8 MILWARD TERRACE

MEATH ROAD - RICHMOND TERRACE

MEATH ROAD - CLAREMONT TERRACE

MEATH ROAD - EARLSBROOK HOUSE

*Details not readily available for these houses.

See profiles of the Protected Structures in Appendix (A).

2. LIST OF SURVEYED STRUCTURES, NOT ON PROTECTED STRUCTURE LIST (BUT RECORDED ON THE BUILDING SURVEY OF IRELAND NIAH).

MEATH ROAD - SHORELINE HOUSE AND ARDEEVAN HOUSE.

MEATH ROAD - WOJTYLA HOUSE

MEATH ROAD - ROSEVILLE HOUSE

MEATH ROAD - IVERAGH HOUSE

MEATH ROAD - KILLISK HOUSE

MEATH ROAD - HEYFORD HOUSE

MEATH ROAD - SLOAN TERRACE



NLI - The Meath Road, built c. 1855, with Milward Terrace at left built 1864 by French, Robert, 1841-1917 photographer Published / Created: [between ca. 1865-1914].

3. CHARACTERISTICS OF HOUSES IN THE PROPOSED ACA AREA

Features on specific Terraces, Roads, Avenue and Square:

The characteristics of quite a number of the houses in this proposed ACA area are detailed by the Buildings of Ireland (NIAH) survey carried out by the Department of Arts Heritage and the Gaeltacht, http://www. buildingsofireland.ie/Surveys and can be found in Appendix (A). According to this survey, houses in the roads, avenues, terraces and squares in this proposed area have similar Victorian and Edwardian architectural features. These include Milward Tce, Novara Tce, Sidmonton Sq/Place, Claremont Tce, Richmond Tce, Novara Ave and Wayverley Tce.

- Sidmonton Square are single-storey over basement houses and according to NIAH this design takes advantage of the sloping site and adds considerable interest.
- Novara Terrace some of the balconies have Regency style cast-iron guard rails.
- Most of the Edwardian Houses on Galtrim Road have recessed porches.
- Alexandra Terrace, Novara Avenue Nos. 1-6 have decorative moulded keystones in the form of the 'Prince of Wales' feathers.
- Milward Terrace, the upper floors have granite quoins, sills and string course. Each house has a broad flight of granite steps with wrought-iron guard rails.





Galtrim Road



Novara Terrace



Alexandra Terrace



Milward Terrace

Most of the Terraced houses in the proposed ACA area have the following features:

- Front gardens with cast-iron railings and stone plinths.
- Slate hipped roofs sometimes behind parapets
- Panelled front doors with segmental, or semi-circular fanlights and jams with decorative brackets
- Timber sashed windows
- Brick details
- Rectilinear overlights.
- Front doors with side lights.
- Original crown and cylinder glass survives on some of the houses which adds to their character.

Victorian houses in the ACA area have:

- Granite stone steps
- Cast-iron rainwater goods
- Decorative wrought-iron balconies
- Granite window sills
- Bay windows
- Moulded quoins surrounding openings
- Terracotta tiling at entrances
- Some front entrances are set within projecting porticos
- Segmental pediments in brackets above the windows
- Different colours in the façade of the brick houses and different shapes of brick in some cases.
- Parapet structures
- Natural slate
- Gothic arches made of mixed red and yellow brick.
- Boundary walls of brick, granite (with a chamfered edge to promote the run off of water) or a mix of both.

3 (A) SPECIFIC CHARACTERISTICS OF OTHER HOUSES IN THIS ACA PROPOSAL INCLUDE:

Laxton House on Novara Avenue has a door opening which according to the NIAH is dressed with "distinctive block and start quoins". There is also a Regency style screen sitting in front of the door which raises to support a small balcony.



Laxton House, Novara Avenue - Photo: Mary Hargaden

Killisk House - Meath Road. According to the NIAH "This late Victorian house has an original veranda".



Street-scape settings and features:

Along with the Victorian and Edwardian Houses and buildings dealt with below there are a number of well designed terraces which are not protected or which are not on the Buildings of Ireland (NIAH) survey, carried out by the Department of Arts Heritage and the Gaeltacht. These houses are in keeping with good design and streetscapes. An ACA will give weight to the assessments of developments in regard to this area as a whole and encourage the development of the street-scape with appropriate street furniture and landscape.

The incremental loss of seemingly small elements such as street furniture, original doors and windows, paving and other architectural elements, has a significant effect on the character of an area. All efforts should be made to retain the existing fabric and to aim for the reinstatement of any architectural element, which it has been lost.

The Buildings of Ireland (NIAH) has made comments about the street-scapes in this area which include the following (fuller versions of these comments can be found in Appendix A):

TONER HOUSE, Sidmonton Place – (Old French School) According to NIAH "this Ruskinian Gothic style former terrace introduces a mildly Venetian appearance to the street-scape...... this building has retained much of its original charm and character. This is now an increasingly rare example of the genre".

GALTRIM ROAD is, according to NIAH "one of the most complete and most attractive terraces in Bray"

SIDMONTON SQUARE - According to the NIAH "This small group of houses is distinctive well preserved and has retained much of its original character. The single-storey over basement design takes advantage of the sloping site and adds considerable interest to the street-scape".





Toner House, Sidmonton Place - Google Earth

LAXTON HOUSE, Novara Avenue - NIAH states that this is a "well preserved mid 19c house which is in good condition and which retains its original setting. Despite the addition of rough-cast render, this building maintains the Victorian character of the street-scape".

ALEXANDRA TERRACE, NOS. 1-6, Novara Avenue - According to NIAH this is "one of Bray's more distinctive later Victorian terraces, the grouping contributing much to the street-scape and the unusual keystones lifting the whole row that little bit above the ordinary".

FERGUSLEA HOUSE AND ROSSLEA HOUSE – Waverley Terrace - Adelaide Road. According to NIAH "These two houses are flamboyant and well preserved examples of Edwardian Tudor style houses, they have retained their original setting and add to the historic character of the street in a most dramatic way".



Wellington House, Novara Avenue - Building Survey of Ireland.



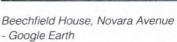
The Parochial Hall and Caretakers House, Novara Avenue - Google Earth

WELLINGTON HOUSE – Novara Avenue. According to NIAH this is "a striking example of an early Edwardian House built with mild Tudor overtones which adds diversity and richness to the rhythm of the street-scape".

THE PAROCHIAL HALL & CARETAKERS HOUSE – Novara Avenue, was built in 1886 by Thomas P. Figgis. To his credit are thirteen stations on the Northern Line subway in London and he was also an adviser to the Presbyterian Church in England.

BEECHFIELD HOUSE - Novara Avenue was built c1880 and is according to the NIAH "in very original condition and is well preserved. It adds to the historic character of the street-scape".







Richmond Terrace, Meath Road - Google Earth

RICHMOND TERRACE, Meath Road – The terrace according to NIAH "is all in very original condition. Each house adds character and quality to the street-scape but with a group as complete as this, the overall effect is greater than the sum of the parts".

MILWARD TERRACE, Meath Road – According to NIAH this is a "well preserved terrace" the terrace "makes a major contribution to the street-scape".

CLAREMONT TERRACE, Meath Road – NIAH this is a "well preserved terrace" the terrace "makes a major contribution to the street-scape".

EARLSBROOK HOUSE, Meath Road - According to NIAH "this is a very decorative late Victorian house whose distinctiveness adds variety to the street-scape".

RAHEEN HOUSE, ARDVEEN HOUSE, SHORELINE HOUSE, IVERAGH HOUSE, SLOAN TCE, WOJTYLA HOUSE, KILLISK HOSE, ROSEVILLE HOUSE, ARD BEAG and HEYFORD HOUSE, on the Meath Road, though not on the 'Protected Structures list' according to the NIAH add rhythm, variety and distinctiveness, contributing greatly to the 19c street-scape

Open Space-Private and Public

SIDMONTON SQUARE PARK - PUBLIC

In the 2011-2017 Bray Town Development Plan Section 8.4.5.2 it was stated that "It is the policy of the Council to consider making Architectural Conservation Areas to preserve the character of areas of special interest" and "Having regard to the requirements of Part IV of the Planning and Development Act 2000 as amended, the Council will investigate the designation of A.C.A.'s for" "Sidmonton Square"

This important amenity is defined by continuous fencing and has an entrance at Sidmonton Square. Tree planting is concentrated within the park boundaries and apart from having a good stock of original trees, new ones have been planted by volunteers and residents. The park is under the control of Bray Municipal District with the cooperation of local residents. It also has a selection of playground furniture and well placed seating.

BOWLING GREEN - ADELAIDE ROAD

This is used by the Bray Bowling Club and is leased from Bray Municipal District.

NOVARA TERRACE PARK - PRIVATE

Residents of Novara Terrace hold keys to this park, which is well maintained and contains quite a number of deciduous trees and adds to the character of the area.



Sidmonton Square Park layout, Aerial Shot - Google Earth

Problems and Pressures

The uniformity of terraces is dependent on continuous horizontal lines and vertical divisions achieved by planned alignment as well as by parapet walls and the repetition of the stucco detailing, each finely balanced against the other. Incremental changes can quickly erode the appearance of historic buildings in particular the use of uPVC windows and door frames.

Altering the shape of window and door openings especially in some of the Victorian Terraces can compromise the integrity of the entire terrace. Bin-storage and car parking spaces, necessitated by sub-divided units, leads to deterioration of visual appearance. Porches, extensions, roof and chimney alterations need to take into consideration the historic nature of the area.

ISSUES INCLUDE:

- Damage or loss of Iron Work.
- Removal of front boundary railings.
- The loss of original sash windows or bay windows.
- Damage or loss of original wall brickwork.
- Extensions which are clearly not in keeping with the spirit of the original designs and using inappropriate materials.
- Electric wiring clutter on some buildings.

- Removal of roof parapets.
- Wall renders being unsympathetic to the other houses in the street-scape.
- Some of the 'curtilages' of the protected structures need to be considered when allowing car-parking spaces to be built especially for the buildings designed by highly regarded architects such as Toner House and Wellington House which were designed by Thomas Newenham Deane.









Objectives

ACA designation will give significant statutory protection to the houses in this area. The designation aims to protect the special character of a place and in this instance this area contains many of the Victorian Terraces outside the seafront in Bray. The importance of the houses in this area lies in their street-scape value.

It is desired that guidelines for development will carry significant weight in determining applications for planning permission within the ACA. Possible outcomes of the acceptance of this ACA submission include:

- Encouraging the retention of original features such as roofs, walls and wall renders, windows, doors, railings, trees street-scapes.
- Ensuring that any developments, modifications, alterations or extensions affecting a structure within the proposed ACA area complies with planning standards and are sited/designed appropriately.
- · Discouraging the abolition of front gardens in favour of off street parking.

NOTE: The Conservation Grants Scheme for Protected structures allow for the careful repair of some of the features of these structures including windows, roofs and railings.

http://www.citizensinformation.ie/en/housing/building_or_altering_a_home/protected_structures.html



Appendix A - Profiles of Protected & Unprotected Structures

PROTECTED STRUCTURES

Where available the details of the architects responsible for the design of the buildings was sourced from the Dictionary of Architects in Ireland http://www.dia.ie/.

Details of the characteristics of the buildings were mainly sourced from the Building Survey of Ireland – National Inventory of Architectural Heritage http://buildingsofireland.ie/Surveys/Buildings

Name of Area	References	Approximate Date Built
1-8 Waverley Terrace, Adelaide Road	Structures including gates and railings. Ref No. 1	1910
Culloden, Wyndham Parkw	Structure. Ref No. 107*	
1-7 Wyndham Park	Structure and railings. Ref No. 108*	
Galtrim Road 1-14	Structure. Ref No. 19	1907
1/7 Novara Terrace	Structure railings and remaining balconies. Ref No. 57	1862
Novara Avenue – 1-11 Alexandra Terrace	Structure. Ref No. 57	1880
Novara Avenue - Bray Parochial Hall including House	Structure. Ref No. 61	1886
Novara Avenue - Ferndale	Structure. Ref No. 60*	
Novara Avenue - Wellington,	Structure. Ref No. 58	1905
Novara Avenue –Sidmonton Cottage	Structure. Ref No. 59*	
Novara Avenue - Novara House		
Novara Avenue – Laxton	Structure. Ref No. 62	1858
Sidmonton Square – 1/6	Structure	1870
Sidmonton Place – Toner House (French School)	Structure. Ref No. 78	1868
Meath Road – 1/8 Milward Terrace	Structure. Ref No. 53	1864
Meath Road - Richmond Terrace	Structure. Ref No. 54	1890
Meath Road - Claremont Terrace	Structure. Ref No. 55	1880
Meath Road - Dargan Court,	Structure. Ref No. 51*	
Meath Road - Earlsbrook House.	Structure. Ref No. 52	1875

^{*}Profiles not included as details not available in the NIAH Building Survey of Ireland

UNPROTECTED STRUCTURES

Buildings - not on the Protected Structure list but recorded on the Building Survey of Ireland. They are considered good examples of Victorian/Edwardian buildings in the NIAH Survey.

Name of Area

Meath Road - Shoreline House and Ardeevan House.

Meath Road - Wojtyla House

Meath Road - Roseville House

Meath Road - Iveragh House

Meath Road - Killisk House

Meath Road - Heyford House

Meath Road - Sloan Terrace

Profiles for Protected Structures

ADELAIDE ROAD 1-8 WAVERLEY TERRACE. REF NO. 1

Built by Edward Breslin the businessman and John Brennan the builder who gave his name to Brennan's Parade and Brennan's Terrace. He named Adelaide Road after his daughter.

WAVERLEY TERRACE - FERGUSLEA HOUSE AND ROSSLEA HOUSE ADELAIDE ROAD. REF NO. 1

Houses here were built c 1910 and were constructed in red brick with mock half timbering. Stone steps lead to the panelled front door with has plain sidelights and a fanlight set within a semi-circular arched opening with moulded keystones. Window frames are a mix of casement and top hung. The roof is finished with castiron rainwater goods, serrated clay ridge tiles and bracketed overhanging eaves. The house is set back behind a rendered wall with elaborate cast-iron railings and gate. According to NIAH "These two houses are flamboyant and well preserved examples of Edwardian Tudor style houses, they have retained their original setting and add to the historic character of the street in a most dramatic way".

MORNINGTON HOUSE - GALTRIM ROAD NO. 1, REF NO. 19

This was built in 1907 It has a "typical Edwardian asymmetrical front elevation with a five-sided, full height, hipped roof, corner bay to the west side, and a full-height canted bay, topped with a gable. Entrance consists of a semi-circular headed opening with moulded archivolt, behind which is a recessed porch area, with a part glazed timber door screen." The windows are of various sizes and have mullioned and transformed timber frames with small panes to the upper lights. House has cast-iron rainwater goods. House is separated from the street by rendered wall and hedging. It is, according to NIAH a "well preserved Edwardian House, which along with the equally well preserved contemporary terrace, is a good asset to the street-scape".

GALTRIM ROAD 2 - 14.

According to the NIAH the Edwardian Houses built in 1907 on Galtrim Road were built as a uniform row of thirteen properties and are "one of the most complete and most attractive terraces" in Bray. The entrances consist of semi-circular headed openings with moulded archivolt fronting a recessed porch ".....the windows are flat headed and have mullioned and transformed timber frames, with casement and top-hung openings......Cast iron rainwater goods". The tiled pitched roof has a slight overhang with exposed rafter ends and plain barge-boards, decorative ridge tiles and brick chimneys-tacks with corbelling" Some of the windows have upper lights which are filled with small panes and some are leaded.

KILADREENAN HOUSE - 14, GALTRIM ROAD

This house has an asymmetrical front elevation with a recessed, veranda-like porch to the east side with a small first floor balcony area directly above it. The entrance consists of a mainly glazed timber door screen, with decorative leaded panes. Above the porch is a balcony with plain railings and posts which support the overhang of the main roof. The windows have timber frames and stone sills and cast iron rainwater goods are used for drainage. The house is separated from the street by a garden which has a decorative wroughtiron gate with square brick piers. According to NIAH "This house is not as architecturally interesting, nor ads well preserved as its near neighbours, however, it is still an important part of the grouping and as such is still of value".

NOVARA TERRACE

Built in 1862 According to the National Inventory of Architectural Heritage (NIAH) Novara Terrace on Galtrim Road is "a quite well preserved and complete terrace of the mid 19th century; its rhythm adds richness to the area and its age contributes a sense of permanence to the street-scape". Some of the balconies have Regency style cast-iron guard rails and some of the rainwater goods are cast-iron. They are slightly set back from the road behind hedges.

NOVARA AVENUE - ALEXANDRA TERRACE NOS 1-6

The six identical houses in Alexandra Terrace were built in 1880. They have decorative moulded keystones in the form of the 'Prince of Wales' feathers. Most of the houses have cast-iron rainwater goods. The houses front on to the street but are separated by small gardens with wrought iron gates with rendered piers.

According to NIAH these properties constitute "one of Bray's more distinctive later Victorian terraces, the grouping contributing much to the street-scape and the unusual keystones lifting the whole row that little bit above the ordinary".

NOVARA AVENUE - ALEXANDRA TERRACE NOS. 7-11

These houses have original cast iron rain water goods, original fanlights and wrought-iron gates. These two-bay three-storied houses were built in 1865 as part of a group of five similar properties. According to NIAH these houses remain a "valuable part of the street-scape".

NOVARA AVENUE - THE PAROCHIAL HALL, REF NO. 61

The Parochial Hall was built in 1886 by Thomas P. Figgis who was based in England. To his credit are thirteen stations on the Northern Line subway in London and he was also an adviser to the Presbyterian Church in England.

BEECHFIELD HOUSE NOVARA AVENUE

This was built c1880 and is according to the NIAH "in very original condition and is well preserved. It adds to the historic character of the street-scape".

NOVARA AVENUE - WELLINGTON HOUSE. REF NO. 58

Detached three bay two and a half storey house, built c 1905. According to NIAH this house is built in red brick with granite dressings. Front door has a plain fanlight and is set below a stone balcony with turned balusters supported on a column and anta pilasters all of Tuscan order. Windows have block and start dressings, some are mullioned and transomed. The pitched roof is covered with rosemary tiles and clay ridge tiles, the eaves are bracketed and the chimney-stacks are brick with slightly corbelled caps with clay pots. Rainwater goods are cast-iron. The gate pillars have decorative pyramidal caps and support a wrought-iron gate. According to NIAH this is "a striking example of an early Edwardian House built with mild Tudor overtones which adds diversity and richness to the rhythm of the street-scape".

NOVARA AVENUE - LAXTON HOUSE. REF NO. 62

This two storey three bay house was built in 1858. The NIAH states that the panelled door is flanked by pilasters and has a semi-circular headed fanlight. The door opening is dressed with "distinctive block and start quoins". A wrought-iron Regency Style screen sits in front of the door and raises to support a small balcony. Windows have timber sash frames and a "French window opens from first floor onto the balcony". Eaves are overhanging and rainwater goods are cast-iron. House has wrought-iron gates set in a mature garden. According to NIAH this is a "well preserved mid 19c house which is in good condition and which retains its original setting. Despite the addition of rough-cast render, this building maintains the Victorian character of the street-scape".

SIDMONTON SQUARE NOS. 1-6 REF NO. 79

These consist of three pairs of semi-detatched three-bay single-storey over basement houses built c 1870. Each house has granite stone steps and panelled front doors which have plain sidelights and fanlights set within segmental arch headed openings with moulded keystones and surrounds. Windows have timber sash frames. Rainwater goods are a mixture of uPVC and cast-iron. The houses face the road and are slightly set back behind low walls with, in most casts, original cast-iron gates. According to the NIAH "This small group of houses is distinctive well preserved and has retained much of its original character. The single-storey over basement design takes advantage of the sloping site and adds considerable interest to the street-scape".

SIDMONTON PLACE - TONER HOUSE REF NO. 78 (OLD FRENCH SCHOOL)

The four houses in Sidmonton Place were built by the famous architect Thomas Newenham Deane c 1868 who was also responsible for building the Town Hall and Market Square at the Vevay Road end of the Main Street in Bray. Deane was also responsible for works on Christ Church College in Oxford, Portumna Castle Co. Galway, St. Canice's cathedral in Co. Kilkenny, St. Anne's in Dawson Street, the Museum Building in Trinity College, Westland Road Railway Station among many others. House is finished in red brick with straw-coloured brick dressings in Ruskinian Gothic style. The doors are recessed within Gothic arched porches. Window openings have shallow Gothic openings with timber sash frames. Two of the houses have first floor oriel windows supported on brackets. The roof is finished with slate and cast-iron rainwater goods. The building is slightly set back from the road. According to NIAH this group of houses is "prominently sited at the junction of Sidmonton Place and Novara Avenue, this Ruskinian Gothic style former terrace introduces a mildly Venetian appearance to the street-scape. Despite the two changes of use, this building has retained much of its original charm and character. This is now an increasingly rare example of the genre".

MEATH ROAD - MILWARD TERRACE. REF NO. 53

Milward Terrace houses were built in 1864. Basement constructed in squared rubble granite with brick dressings. Upper floors have granite quoins, sills and string course. Each house has a broad flight of granite steps with wrought-iron guard rails and the front door is flanked with panelled pilasters which support a cornice above which is a plain fanlight all of which is "set within a semi-circular headed opening which is in itself recessed within a semi-circular headed open porch". The porch arch is dressed with radial brick of contrasting colours. Cast-iron rainwater goods are used. The low granite garden wall has square brick gate pillars with granite caps. Some of the houses have "oriel bay" windows, which have "one over one timber sash frames". According to the NIAH this is a "well preserved terrace" which "makes a major contribution to the street-scape".

MEATH ROAD - RICHMOND TERRACE. REF NO. 54

These houses were built c. 1890 and were constructed "in red brick with straw and grey coloured brick decoration. The front panelled door is flanked by panelled pilasters with console brackets which support a projecting cornice with a plain fanlight; all is set within a semi-circular headed opening with radial brick decoration". Window openings are "segmental arch-headed with radial brick decoration; each one has a one over one timber sash frame. The pitched roof is slated with cast-iron rainwater goods. The house faces the road and is slightly set back behind wrought-iron railings". This is a group of six similar houses. The terrace according to NIAH is all in very original condition. "Each house adds characte r and quality to the street-scape but with a group as complete as this, the overall effect is greater than the sum of the parts".

MEATH ROAD - CLAREMONT TERRACE, REF NO. 55

Similar to other red brick houses on this road this house was built c 1880. Panelled front door has a plain fanlight set within a segmental arch headed opening, each opening has a raised brick surround. Window openings have one over timber sash frames and the house has cast-iron rainwater goods. According to NIAH "the houses are substantially complete and compliment the street-scape within this 19th century area of townscape".

MEATH ROAD - EARLSBROOK HOUSE, REF NO. 52

This was built c 1875 is designed with free classical detailing. Panelled front door with plain sidelights, semi-circular fanlight and flanked panelled pilasters with moulded capitals supporting a segmental arched pediment. Windows are segmented headed with eared moulded segments with keystones. Windows are *timber sash*. The roof is hidden behind a high parapet moulded coping with rise to centre of parapet. Very decorative wrought-iron front gate. According to NIAH "this is a very decorative late Victorian house whose distinctiveness adds variety to the street-scape".

VICTORIAN PILLAR BOXES

Junction of Sidmonton Road and Loreto Avenue. Junction of Sidmonton Road and Novara Terrace. Ref No. 44

Profiles for Unprotected Structures

Houses - not on the Protected Structure list but recorded on the Building Survey of Ireland. They have features which are considered good examples of Victorian/Edwardian housing.

NOVARA ROAD - NOVARA HOUSE

"Novara House, an early beach lodge, lying at the southern end of Novara Avenue, dates from this time, though it has been extensively modernised. Originally known as Bay View, it is sited a half mile inland from the seafront itself." This house dates from the early 18c.¹ "The façade and gateposts of the early bathing lodge survive." ²

MEATH ROAD - SHORELINE HOUSE AND ARDEEVAN HOUSE.

Both of these were built c 1880. Feature wrought iron railings, timber sash frames and some cast-iron rainwater goods. The front door has projecting cornices and set in a semi-circular arch-headed opening with matched notching and has a plain fanlight. According to NIAH these well preserved late Victorian houses, "retain much of their original character and are in good condition. The houses add variety and rhythm to the street-scape though setting is weakened by the loss of the front gardens".

¹ xxharrison. Just another WordPress.com site https://xxharrison.wordpress.com/2015/03/23/bray-a-short-history/

² Davies, Mary. Author of That Favourite Resort: The story of Bray Co Wicklow

MEATH ROAD - WOJTYLA HOUSE.

This house was built c 1880 similar to other houses along this road the panelled front door is flanked with Panelled pillars with console brackets supporting a projecting cornice with a plain fanlight all set within a segmental-arched opening with moulded surrounds. To either side is a canted single-storey bay with a hipped roof. Windows have timber sash frames and the roof is finished with cast-iron rainwater goods. The house is slightly set back behind wrought-iron railings and gates. According to NIAH the house is "set within an area of historic character is well preserved and maintains the 19c feel of the street-scape".

MEATH ROAD - ROSEVILLE HOUSE

This house was built c 1890. It has two projecting bay windows with a gable. It has its original roofing on the main building of black-blue slate with green slate over the bay windows. The chimney stacks are panelled and rendered with corbelled caps and clay pots. The house still has its original square gate pillars with wrought iron gate. According to NIAH "this is a good example of an imposing late Victorian house which adds much to the built heritage of the area".

MEATH ROAD - IVERAGH HOUSE

This house was built c 1880 and has a panelled front door with a plain fanlight set within a semi-circular headed opening with twisted rope decoration flanked with panelled pilasters with console brackets supporting a projecting cornice. There are two storey cantred bay windows, a slated roof with cast-iron rain-water goods. The chimneys are rendered with corbelled capstone and clay pots. The original square gate pillars have pyramidal caps and support wrought-iron gates. According to NIAH this is "a well-preserved original late Victorian house, which retains much of its original charm and character: its properties add

greatly to the street-scape".

MEATH ROAD - KILLISK HOUSE

This house was built circa 1883 in redbrick with projecting base, eaves and decorative saw-tooth course. It has a plaque stating "Killisk House 1883". The house has a plain front door, a fanlight set in a semi-circular headed opening. The inner screens has decorative sidelights and fanlight. The North window is a cantred bay and the South window is a square bay. The veranda is slated and supported by plain timber posts with a decorative timber fascia. The timber sash windows are segmental arch-headed. The upper windows have margin panes. Roof is slated with barge-boards. There is a granite and brick wall with cast-iron gates. According to NIAH this is a "good and well-preserved example of a distinctive late Victorian House with an original veranda. This house adds much to the 19c feel of the street-scape".

MEATH ROAD - HEYFORD HOUSE.

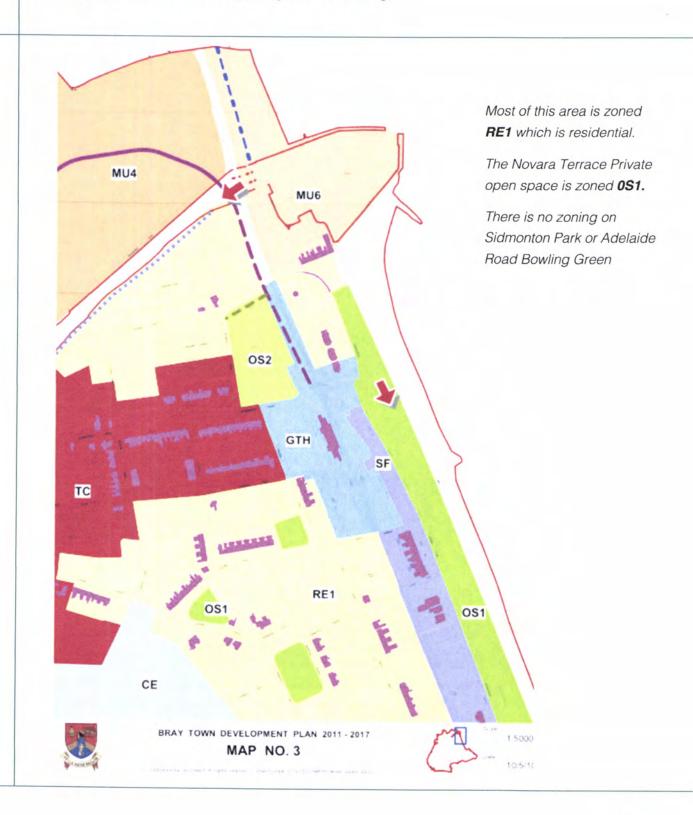
This is a semi-detached, two-bay two-storey house, built c.1880. The panelled front door has "panelled pilasters with console brackets and plain fanlight, all within a semi-circular headed opening with moulded surround. To the south is a two-storey canted bay. Window openings are all flat-headed with two over two timber sash frames. The pitched roof is slated with cast-iron rainwater goods and projecting eaves. An original chimney-stack is rendered with corbelled caps and clay pots; a second rendered replacement chimney-stack is small and plain. The house is slightly set back behind a low rendered wall with a small pedestrian wrought-iron gate". According to the NIAH this is "one of a pair of modest but well preserved houses of the later Victorian period, whose plain proportions fit well with the 19th-century feel of the street-scape".

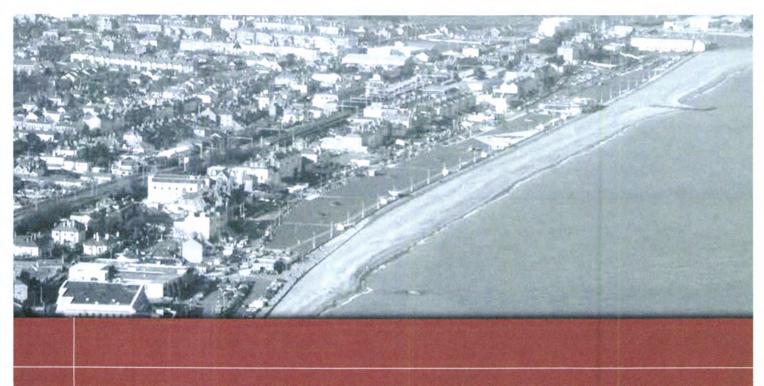
MEATH ROAD - SLOAN TCE.

According to NIAH, these are semi-detached two-bay two-storey houses, built c.1880. They have panelled front doors with panelled pilasters with console brackets supporting projecting cornices; above is a plain fanlight and all is set within a semi-circular headed arched opening with a moulded surround. They have timber sash windows and the roof is finished with slate and cast-iron rainwater goods. The chimney-stacks have corbelled caps and clay pots. The house has decorative wrought-iron railings on a low wall with square gate pillars and pyramidal caps. The NIAH states that these are "well preserved houses which remain very much intact. A very typical design which adds greatly to the 19th-century street-scape".

Appendix B - Existing Designations/Zonings

>

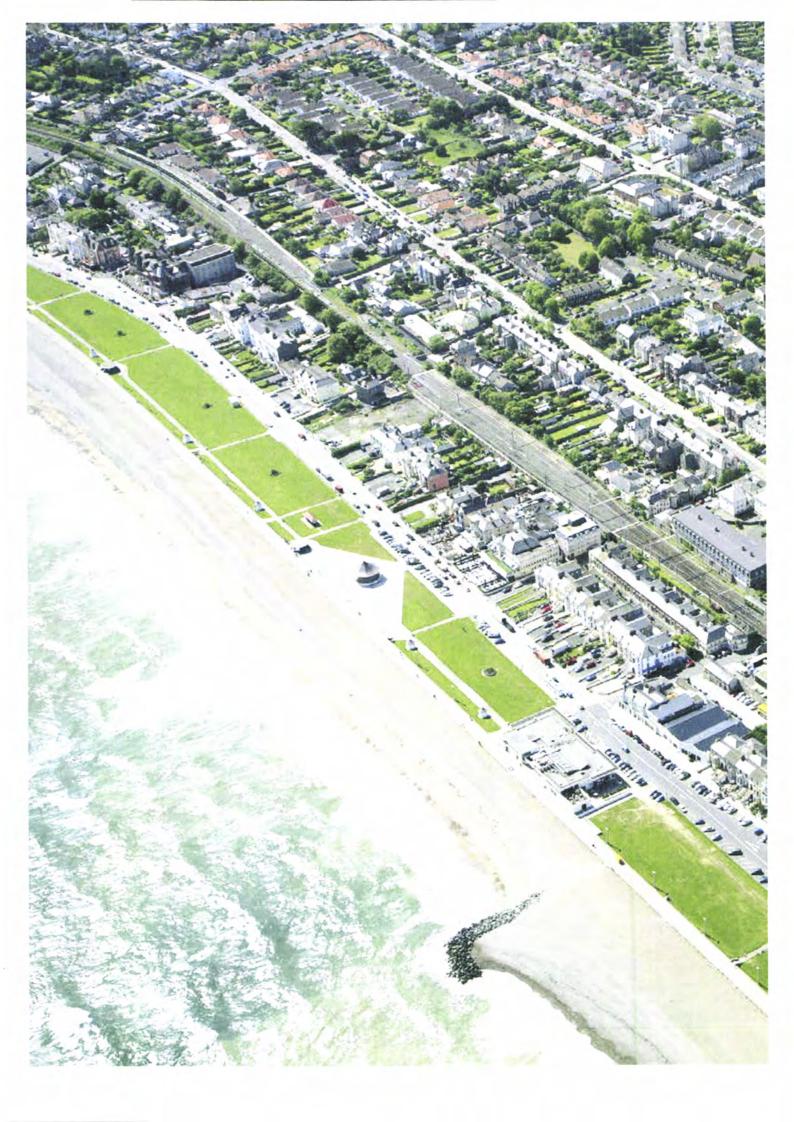




PROPOSED ARCHITECTURAL CONSERVATION AREA PLAN for Bray Seafront (Plan No: 4 of 4)

Submitted By: Bray Tidy Towns





Contents

1. Introduction	2
Proposed Architectural Conservation Areas - Map	4
3. Architects and Engineers	5
Character of the Proposed Architectural Conservation Area (ACA)	7
4.1. List of Protected Structures in ACA	5
4.2. List of Surveyed Structures, not on Protected Structure list	8
4.3. Architectural Features of Buildings	9
5. Street-scape Settings and Features	10
5.1. Landscape/Streetscape settings and features	10
5.2. Detailed Appraisals of Protected Structures from NIAH	10
5.3. Detailed Appraisals of Unprotected Structures from NIAH	14
6. Problems	16
7. Objectives	17
Appendix (A) Profiles of Protected and Unprotected Structures	18
Appendix (B) Existing Designations/Zoning	23

1. Introduction

This is the third of four ACA submissions on Bray, in this case dealing with Bray Seafront as outlined on the attached Map at Appendix B. As with the ACA previous submissions this area was primarily developed in Victorian times and contains many examples of well designed buildings by impressive, nationally accredited architects and engineers of the Victorian era.

The basic original Bray Esplanade according to the National Inventory of Architectural Heritage (NIAH) was laid out between 1859-61 by William Dargan. The present concrete walled one described below was built by the Town in the 1880's. It comprises a slightly raised concrete walkway some four metres wide which separates and protects the gardens from the beach and sea. It has a tubular metal railing with ball finials to the seaward side and a low rendered wall with wrought iron sloping railing (all of which acts as a very long bench) to the western side. Various openings on either side give access to and from the beach and gardens. There are various structures to the garden side:

- One is the only surviving of three bandstands. It is octagonal in plan and has decorative cast-iron columns which support a copper clad roof.
- In addition there is a small rectangular plan shelter which is constructed in cast-iron and timber and has a replacement metal deck roof.
- Also there are a number of small kiosks which have copper clad roofs; these open on summer days for the sale of confectionery.



Although conceived and constructed over 140 years ago this walkway is in regular use today for the purpose for which it was originally intended. It is a most valuable, useful and decorative Victorian legacy which complements the 19th century buildings of the promenade.

The coming of the railway sparked off a massive building boom and turned the town into a major seaside resort and commuter town for Dublin. The sea air was regarded as healthy and therefore many Dublin families moved to Bray for the Summer and many houses were rented.

According to Mary Davies who has written extensively on Bray's history

"In the late 18th century and early 19th centuries it blossomed into a successful resort, catering for invalids and for those seeking fresh air away from grimy Dublin, and forming a base for visitors to the beauty spots of Wicklow. This existing resort role was a factor in the deliberate choice of the town for development when the railway was built in the 1850's.

As a planned town – albeit one planned by businessmen rather than by a great landowner – Bray is one of a small distinctive group of Irish towns designed; as a major Irish holiday resort on the British pattern it has a character all of its own.

Although the general decline of the traditional seaside resort after 1970 has changed Bray's role yet again, the lengthy Esplanade, the long straight roads and the grand late-nineteenth century terraces and houses survive as a reminder of the town's special history".

Many famous people are associated with Bray seafront: James Joyce lived at 1, Martello Terrace, The Wilde Family lived in the Strand Hotel and built Kinvara House.

Many celebrities visited Bray: the Prince of Wales stopped off in Bray for a few hours on their way to Kilruddery in 1868; the Lord Mayor of London and Mayor of York visited in 1875; William Gladstone in 1877; the Queen of Romania in 1890 and Lord Lieutenants of Ireland on numerous occasions. Bray even had a perfumiere who boasted the patronage of the Prince of Wales ².

¹ Davies, Mary. (2007) That Favourite Resort: The story of Bray, Co. Wicklow.

² Isolde Moylan The Development and Growth of Bray c 1750-1900 submitted to the Dept of Modern History. Trinity College. 1972.

2. Proposed Architectural Conservation Areas - Bray



3. Architects and Engineers

Most of the information below dealing with architects and engineers was sourced through the Dictionary of Architects www.dia.ie Bray Promenade was designed by Patrick Forstall Comber in 1884, who also worked on the Sea Wall and Bray Harbour. He was appointed surveyor to Bray Township in 1881 and lived in the Prince of Wales Terrace in Bray. He was responsible also for many water works and labourers' cottages in Bray. Outside that, his commissions included the building of the chapel, wards and nuns residences at Loughlinstown hospital and he also designed some of the buildings at Deans Grange cemetery.

"P.F Comber who was the Bray town surveyor, drew-up Plans for the Sea Wall and promenade, ornamental railings were put at the top. Six sets of steps led to the beach. The 18ft wide promenade was asphalted and sloped gently towards the sea for drainage. A dwarf wall was then built to protect this area and "on this wall wooden planks were to be placed and seating formed with ornamental backs". Seven places for steps only and four places with steps and ramps for invalid chairs were erected with ornamental gas lamps at either side. An Act of "Parliament authorized the building of Comber's sea wall and promenade was passed in 1881". Furthermore "Lord Brabazon was responsible for its quick passage through the commons. In 1884 tenders for the work were advertised and that of Mc Alpines of Glasgow were accepted". The "Lord Lieutenant Lord Carnarvon opened it. This was built in stages. Debenture stock financed the work. It was known as the Grand Marine Promenade".3

Breslin's Royal Marine Hotel was added to by George Wilkinson (1859-63). He was also the architect for three railway companies and the railway stations he designed include Bray, Greystones, Harcourt Street, Dalkey, Athlone and Sligo. He was also the famous Poor Law Commission architect who designed several poorhouses around Ireland.

Esplanade Terrace/ Kinvara House, was probably designed by the architect and engineer Isaac Farrell who was also responsible for several well known buildings in Dublin and elsewhere including the Presbyterian Church, Adelaide Road, the National Bank in College Green and the Methodist Church in St. Stephens Green.

The Esplanade Pavillion, was designed by William Mansfield Mitchell in 1883 he was also responsible for additions to Christ Church, Park Road, Dunlaoghaire (new tower), Church of Ireland, Monkstown (new chancel), Glenart Castle (additions to) and gate lodge for Dunlaoghaire Park.

³ Isolde Moylan The Development and Growth of Bray c 1750-1900 submitted to the Dept of Modern History. Trinity College. 1972

The Bray Head Hotel, previously the Bethel Hotel Ltd, was added to by the architect William Henry Byrne in 1901. He was very prolific and worked on changes and additions to many chapels, churches, and parochial houses, in Dublin and in the rest of Ireland. Some of his interior decoration work included working on the transepts, apses, pulpit, sacristy and communion rail of the Holy Redeemer Church in Bray from 1894 – 1898. He also built the curates house in Bray for Dr. Donnelly, Bishop of Carea.

Brennans Terrace and The Wavecrest (now known as the Porterhouse), were designed by the architect John Joseph Lyons in 1859, he was the founder of the Dublin Builder. Lyons was also responsible for many works including the Circular Oratory in Glasnevin cemetery, houses at Sorrento Terrace, side altars at the Pro-Cathedral, St. Augustine's Church Galway to name but a few.



Brennans Terrace - Photo Google Maps

4. Character of the proposed Architectural Conservation Area (ACA)

4.1. LIST OF PROTECTED STRUCTURES IN THE ACA:

ESPLANADE HOTEL/LACYS

BELLA VISTA

1/8 MARTELLO TERRACE

MARTELLO TOWER

1/5 MARINE TERRACE

1/12 BRENNANS TERRACE

THE WAVECREST (PORTERHOUSE)

JIM DOYLE'S

SEANCHARA - TULLYRA

1/4 ESPLANADE TERRACE -- KINVARA HOUSE

STRAND HOTEL

DUNLUCE **

TREE OF IDLENESS **

ALTONA

NEPTUNE HOUSE

KELLY'S BATH HOUSE

1/4 MOUNT NORRIS VILLAS

BRAY HEAD HOTEL

1/6 FONTENOY TERRACE

THE BATTERY **

ST. MARY'S TERRACE **

^{**} Details not readily available for these houses. See profiles of the Protected Structures in Appendix (A).

4.2. LIST OF SURVEYED STRUCTURES, NOT ON PROTECTED STRUCTURE LIST BUT RECORDED ON THE BUILDING SURVEY OF IRELAND (NIAH).

BRENNANS PARADE

COASTGUARD COTTAGES **

FITZWILLIAM TERRACE/MALBOROUGH TERRACE

MARINE TERRACE

ST. CANICE'S/SEADECO TWO OF THE ART DECO HOUSES AT HARBOUR END OF SEAFRONT

ST. TERESA'S NURSING HOME

** Details not readily available for these houses.

See profiles of the Unprotected Structures in Appendix (A).



Mount Norris Villas - Photo Patrick Comerford 2016

4.3. ARCHITECTURAL FEATURES OF BUILDINGS

Most of the buildings in the proposed ACA for the seafront area were built in the Victorian era and have some or all of the following features:

Entrances

- Front gardens with cast-iron railings and stone plinths.
- Granite stone steps
- Iron railings usually in with one of the two main filial designs namely 'fleur the lis' and 'palmette'.

Doors

- Panelled front doors with segmental, or semicircular fanlights and jams with decorative brackets
- Rectilinear over-lights.
- Front doors with side-lights.
- Decorative wrought-iron balconies
- Front entrances are set within projecting porticos

Windows

- Timber sashed windows
- Granite window sills
- Bay windows
- Moulded quoins surrounding openings
- Segmental pediments in brackets above the windows

House Finish

- Different colours in the façade of the brick houses and
- Parapet structures
- Brick detail
- Natural slate
- Boundary walls of brick, granite (with a chamfered edge to promote the run off of water) or a mix of both.
- Cast-iron rainwater goods.



Entrance



Windows



Doors



House Finishes



Railings

5. Streetscape settings and features

5.1. LANDSCAPE/STREETSCAPE SETTINGS AND FEATURES:

The landscaping of the seafront is quite specific and unique and attention is constantly given to the upgrading and re-creation of the promenade area, the seating area and the park area together with the facilitation of the necessary road and cycle access while paying attention to the setting of the houses along the Strand Road.

Apart from the houses, the design of the 'Bray Promenade Railings', the sensitively restored 'Victorian Seat Backs', the recently added street furniture and granite pathways, the Martello Tower at the Harbour-end and the dominating presence of Bray Head creates a theatre of interest which consistently engages the imagination of the public, poets, writers, artists, musicians, filmmakers and photographers.

The seafront is also used daily by walkers, dog-walkers, runners, athletes, cyclists, swimmers, fishermen, wheel-chair users, diners, picnickers, sailors, scouts and guides to name but a few.

It is also the setting for charity, musical and spectacular events from the award winning "Air-Show" through to triathlon participants, to Sumo Runners and many others. It is truly a rich resource shared by all segments of the population.

5.2. DETAILED APPRAISALS FOR PROTECTED STRUCTURES FROM NIAH:

The Buildings of Ireland (NIAH) survey carried out by the Department of Arts Heritage and the Gaeltacht, http://www.buildingsofireland.ie/Surveys, has made the following comments in relation to the following protected structures and streetscapes in this area (see table on page 8)

Fuller versions of these comments are in the attached Appendix A





NLI - Esplanade, Bray, Co. Wicklow by French, Robert, 1860-1920 Photographer (Lawrence Collection)

Esplanade Hotel – a well-preserved late Victorian hotel which retains much of its original detailing and all of its original grandeur. Its proportions add considerably to the streetscape of the sea front.

Bella Vista - Memorable, late Victorian eclectic, house which makes a unique contribution to the sea front.

1/8 Martello Terrace - one of Bray's earliest, best preserved, and most distinctive seafront terraces; it is also of some historical value due to the fact that James Joyce lived in one of the properties between 1887 and 1891.



Martello Terrace - Photo, NIAH

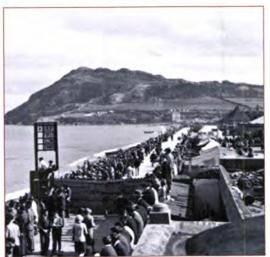
Martello Tower - A good example of a Martello tower which has found a new use. Originally Bray had two such towers but that to the east of Strand Road was demolished in 1884. This is an important example of comprehensive sea defences which were erected around the British Isles in the early 19th century to resist the threat of invasion by the French.

2/5 Royal Marine Terrace - well preserved mid 19th-century houses, which are in very good condition. Their imposing design and setting add much the 19th-century character and streetscape of the promenade. They are unusual in that they face a private cul-de-sac and have a very public elevation to the promenade.

Hibernia Inn – 1, Royal Marine Terrace - although it was radically altered in the early 20th century this structure remains a good example of a conversion of a house to commercial use. It is well preserved and in good condition and its character and detailing adds much to the rhythm of this mainly 19th century street.



Hibernia Inn - Google Maps



NLI - Swimming Event, Esplanade, Bray, Co. Wicklow Eason photograph Collection 1900 - 1939

1/12 Brennans Terrace - one of Bray's earliest and most complete seafront terraces. It is of considerable importance in terms of local heritage and makes a positive contribution to the streetscape.

Wavecrest/ Porterhouse - Although it was much altered in the later 20th century, this remains a good example of a conversion of a house to commercial use. It is well preserved and in good condition and its character and detailing add much to the rhythm of this mainly Victorian promenade.

Jim Doyle's - Although it was much altered in the later 20th century this remains a good example of a conversion of a house to commercial use. This flamboyant Edwardian free style design is well preserved and in good condition and its design adds variety and rhythm of this mainly 19th century promenade.

Seanchara/Tullyra - this delightful former house is otherwise in excellent condition and adds much variety to the promenade. It is in marked contrast to many of the adjacent tall houses.

1/4 Esplanade Terrace - Somewhat austere but with much site presence this group make a valuable contribution to Bray's sea front. Despite many replacement windows this property has retained many original features.

Elsinore/Strand Hotel - A well preserved example of an early but quite modest hotel which recalls the Victorian love of the seaside. It forms an important part of the promenade which is comprised of mainly Victorian houses. Sir William and Lady Jane Wilde built Esplanade Terrace and Elsinore (now the Strand Hotel) as an investment. Oscar Wide inherited the properties in 1876 and sold them in 1878.

Altona - A well preserved example of an early semi-detached dwelling which recalls the Victorian love of the seaside and forms an important part of the promenade's set of mainly Victorian houses.



Fontenoy Terrace - Photo, Google Maps

Neptune House - A well preserved example of an early semi-detached dwelling which recalls the Victorian love of the seaside and forms an important part of the promenade's set of mainly Victorian houses.

Kelly's Bath House - Despite changes of material and loss of detail, this modest bath house is nevertheless an extremely rare example of building genre in the later 19th century once relatively common in coastal resorts. It shares with, and contributes to, the group value of the promenade and Strand Road.

1/4 Mount Norris Villas - The houses are somewhat altered but still retain much of their charm.

Bray Head Hotel - Though now somewhat altered this hotel still retains much of its late Victorian grandeur and forms a fitting end to Bray's largely 19th-century seafront.

1/6 Fontenoy Terrace - a palace-fronted terrace of c.1860 whose proportions add grandeur to the streetscape.

5.3. DETAILED APPRAISALS FOR UNPROTECTED STRUCTURES FROM NIAH:

The NIAH has the following comments to make in relation to the following unprotected structures along Strand Road (see table 1a above):

The Buildings of Ireland (NIAH) has made the following comments in relation to the following unprotected structures and streetscapes in this area (see table 1 above):

Fuller versions of these comments are in the attached Appendix A

Brennans Parade - a uniform mews terrace of fourteen, something of a rarity within Bray. The property has been altered somewhat with the replacement of the window frames, however as part of this unique terrace, it remains of some value.

St. Canice - This is a good example of a modern movement design of the early 20th century with mild Art Deco overtones. It was built as a pair with the other house set to the south side. This adds considerable variety to the streetscape and is an increasingly rare example of the genre.

Seadeco House - This is a good example of a modern movement design of the early 20th century with mild Art Deco overtones. It was built as a pair with the other house set to the north side. This adds considerable variety to the streetscape and is an increasingly rare example of the genre.





Marine Terrace - Google Maps

Marine Terrace - one of Bray's earliest seafront terraces- a terrace whose simple, well-mannered, relatively low two-storey proportions, set it apart from many of its neighbours yet allow it to make a valuable contribution to the streetscape.

St. Teresa's Nursing Home - Although it was altered in the later 20th century, this remains a good example of a conversion of a house to "commercial" use. It is well preserved and in good condition and its character and detailing adds much to the quality of this mainly 19th century street.

Fitzwilliam/Marlborough Terrace - In relation to loss of detail, this terrace now suffers from the "significance of small effects". That said, it is still a prominent and important part of the 19th century fabric within what is essentially a 19th century town. It maintains the flow of tall detached and terraced properties along the promenade.

6. Problems and Pressures

- Small incremental changes can erode the historic buildings in particular the use of uPVC windows and door frames.
- There are a number of gap sites on the seafront leading to the understandable pressure to maximize the use of these sites which can lead to a tipping point between this and retaining the character of the area.
- Front extensions to buildings, are sometimes insensitive to its character.
- Repairs are sometimes not in keeping with the character of the buildings.
- Painting of previously unpainted brick or stone surfaces can negatively impact on the whole structure.
- Cheap or temporary signage can overpower neighbouring non-commercial streetscapes.
 Such signage when allowed to stay unchecked can create a precedent.
- Additions to buildings can be excessively out of character with the area and the immediate neighbouring buildings.
- Bin-storage, necessitated by sub-divided units, leads to deterioration of visual appearance.

- Pressure will mount on the Bray Head Hotel to change some of the protected parts of its original structure. Though this building is arguably in a bad condition it is none the less desirable that the site and general building layout of the apartments will take into consideration the Victorian seafront context of this building in respect of:
 - Colour
 - Site layout building well set back from the road.
 - Mounted railings on road boundary wall.
 - Protected parts of the current structure.
- Altering the shape of window and door openings especially in some of the Victorian Terraces can compromise the integrity of the entire terrace.
- Alterations to porches, extensions, roof and chimney alterations can have a detrimental effect of the overall 'feel' of the buildings and terraces.
- Curtilages and attendant areas of protected structures are not always fully considered when improvements are made to structures.









7. Objectives

ACA designation will give significant statutory protection to the houses in this area. The designation aims to protect the special character of a place and in this instance this area contains many Victorian Terraces. The importance of the houses in this area lies in their streetscape value.

It is desired that guidelines for development will carry significant weight in determining applications for planning permission within the ACA. It is also desirable that unnecessary controls are avoided while ensuring that new developments will accord with the proposed ACA designated area. Possible outcomes of the acceptance of this ACA submission include:

- Encouraging the retention of original features such as roofs, walls and wall renders, windows, doors, railings, trees, green areas, public walking and cycling areas and streetscapes.
- Ensuring that any developments, modifications, alterations or extensions affecting a structure within the proposed ACA area complies with planning standards, are sited/designated appropriately and are not detrimental to the general character of the ACA.
- To encourage the removal of redundant or unsightly signage which detract from the visual quality of the visual realm.

- Discouraging the abolition of front gardens in favour of off street parking.
- To encourage the reinstatement of original features.
- To ensure that any works carried out are of the highest standards and do not add clutter to or detract from the character of the area.
- To avoid the demolition of the removal of protected structures and to encourage the maintenance so that structures do not fall into disrepair.



Appendix A - Profiles of Protected & Unprotected Structures

PROTECTED STRUCTURES

Where available, the details of the designing architects was added, and this information was sourced from the Dictionary of Architects in Ireland http://www.dia.ie/.

Details of the characteristics of the buildings were mainly sourced from the Building Survey of Ireland – National Inventory of Architectural Heritage http://buildingsofireland.ie/Surveys/Buildings

Name of Area/Structure

Esplanade Hotel/Lacys

Bella Vista

1/8 Martello Terrace

Martello Tower

1/5 Marine Terrace

1/12 Brennans Terrace

The Wavecrest (Porterhouse)

Jim Doyle's

Seanchara - Tullyra

1/4 Esplanade Terrace - Kinvara House

Strand Hotel

Dunluce **

Tree of Idleness **

Altona

Neptune House

Kelly's Bath House

1/4 Mount Norris Villas

Bray Head Hotel

1/6 Fontenoy Terrace

The Battery **

St. Mary's Terrace**

^{**} Details not readily available for these houses. See fuller profiles of the Protected Structures in Appendix A.

PROFILES FOR PROTECTED STRUCTURES - NIAH

Esplanade Hotel – According to NIAH this a detached multiple bay 3 storey Gothic style hotel built in 1900. It is constructed in red brick with ground floor finished in smooth render. The façade consists of cantered bay windows, which have hipped, gabled or spire like slated roofs. The door opening is set within a Gothic arched opening with sandstone dressing. This opening is framed with painted pilasters. There are timber sashed windows throughout and cast-iron rainwater goods.

Bella Vista – A three-storey terraced over basement house built c 1890. The building is rendered with moulded decoration. There is a large canted projecting bay window on one side. There are steps to the front entrance with a decorated guard rail. The part panelled door has a canopy supported on moulded brackets with a plain fanlight. There is a cast iron balcony on the first floor. The chimney stacks have corbelled caps and the house is set back from road behind decorative wrought-iron railings. Bella Vista was built in 1890 for the Lord Mayor of Dublin – Joseph Meade.

Martello Terrace – Two two-bay three-storey houses, row of eight, built in 1860. A veranda and first floor Regency style balcony spans the front of the buildings, continuing across the whole grouping. The verandas have low rendered wall with simple railings and steps, and slender iron columns with brackets support the balcony. The balconies have decorative geometric Chinoiserie railings. The entrances consist of timber and glazed doors with narrow sidelights and segmental-headed fanlight. The windows have timber sash frames. Glazed doors to the first floor leads onto the balconies. Windows have painted stone sills. The houses have cast-iron rainwater goods. The properties face onto Bray's grass-covered esplanade, but is separated from it by a small private space now mainly used for car-parking. James Joyce lived in one of the properties in this terrace between 1887 and 1891.

Esplanade Terrace Kinvara House – A terraced six-bay three-storey over basement pair of former houses, built c.1870, now amalgamated as an old peoples' home. The building is reached by a pair of "sweeping stairs with wrought-iron railings" leading to a platform. Doors have semi-circular headed sidelights set within semi-circular headed opening. Windows have sash frames. The first floor have canted oriel windows with panelled bases. Chimney stacks have "corbelled caps and clay pots" Houses are set back behind wrought-iron railings.

Wavecrest/Porterhouse - This is a detached four-bay three-story public house, built c. 1860. This was originally two semi-detached houses. The building has a pedimented parapet and is framed with giant order pilasters. Window openings are dressed with moulded surrounds and some have blocking courses with projecting cornices. The roof is finished with natural slate and cast-iron rainwater goods. The former front garden is now in use as a beer garden. Although much modified it is a good example of a conversion of a house to commercial use.

Jim Doyle's – This is a detached two-bay three-storey former house, built c.1900 in Jacobean style. The building is finished with render and the tall bays are constructed in ashlar granite. To either side of the front east elevation is a three-storey canted bay with a copper clad domed roof; each bay sits on a three-storey bay with a Jacobean gable. Windows have timber sash frames. The roof is finished with natural slate.

Marine Terrace 1 to 4 – This is a terrace of largely identical three-bay two storey houses built in 1862. The façade has moulded quoins and a projecting eaves course. Entrances consist of panelled timber doors, segmental fan lights and decorative brackets supporting a "plain entablature". The houses face on to the road but are separated from it by a garden which is enclosed by a wall with cast-iron gates.

Brennans Terrace – According to Davies "John Brennan had in 1859 built the terrace of twelve houses that bears his name, another terrace which has survived remarkably intact to the present. This terrace, and the other houses southwards along the Strand Road, have the benefit of being set further back from the road than is Fitzwilliam Terrace, with front gardens some ten metres long. When built they were at the very edge of the fields, with their flights of front steps touching the divide between pasture and strand....Although they had good front gardens the houses of Brennans terrace had only modest yards at the rear, given that Brennans Parade with its small terraced dwellings had been fitted in behind next to the railway track and engine house".

Neptune/Altona — According to NIAH these are Semi-detached two-bay two-storey over basement houses, built c. 1880. The building are finished in render with a Tyrolean finish. "Paired and curved dogleg stairs rise to the broad shared stair which rises to the raised ground floor"; they have "decorative wrought-iron guard rails. The panelled doors have plain fanlights and sit within a semi-circular arched opening which in turn is set within a semi-circular arched recess with twisted rope decoration. Window openings have segmental arch heads to the ground floor with flat-headed openings elsewhere and have one over one timber sash windows". They each have "a two-storey over basement canted bay. The roof is obscured by a high parapet with a heavy moulded cornice. Chimney stacks are rendered and have corbelled caps; cast-iron rainwater goods. The house sits at the south end of the promenade behind a rendered wall with square gate pillars with pyramidal caps and looks out to sea". Ground floor window in Neptune has been replaced with French windows.

Tree of Idleness and Dunluce – These are similar in style to Neptune and Altona but are not included in the Building Survey of Ireland.

Bray Head Hotel - This is a detached multiple-bay part three part four-storey hotel, built c. 1860 and extended in the later 19th and early 20th centuries. The building has moulded quoins and decorative balustraded parapet. The central section is three-storey with mansard roof and gabled dormer windows. To the south side is a large three-storey projecting bay while to the north is a large four-storey projecting squared bay which in turn has a two-storey projecting squared bay. The ground floor of the central and northern sections are enclosed with a replacement porch / conservatory. To first floor of the central and northern sections is a balcony with decorative wrought-iron guardrail directly above the porch; to the central section there is a further balcony at second floor and this has a plain guard rail on which the hotel name is painted. The windows have timber sash frames. The mansard roof is slated with mainly cast-iron rainwater goods. The hotel is set behind a rendered wall with decorative wrought-iron railings. The Bray Head Hotel was the flagship of the Seafront hotels; it had white gloved waiters and did not allow any sand on the carpets.

Fontency Terrace Nos. 1/6 - These are terraced two-bay two-storey houses, built c.1860. They form part of a palace-fronted terrace. They have giant order panelled pilaster between the houses. The panelled doors are framed with panelled pilasters with console brackets and is set within a semi-circular headed

opening; the door sits in a projecting two-storey bay. The ground floor window has a projecting cornice which is supported on console brackets while other windows have broad surrounds. The high parapet partly obscures the roof which is pitched and slated. The chimney stack is rendered with a corbelled cap and clay pots. The terrace sits at the south end of the sea front slightly set back from a rendered wall with wrought-iron railings.

UNPROTECTED STRUCTURES

List of Structures, not on the Protected Structure list but recorded in the Building Survey of Ireland.

Name of Area

Brennans Parade

Coastguard Cottages **

Marine Terrace

Fitzwilliam Terrace/Malborough Terrace

St. Canice's/Seadeco two of the Art Deco Houses at Harbour end of the seafront

St. Teresa's Nursing Home

PROFILES FOR UNPROTECTED STRUCTURES - NIAH

Martello Tower – This coursed granite tower was built in 1804. It comprises of a high battered granite wall with small plain defensive openings. It is now surmounted by a glazed 'drum' with a glazed conical roof. It overlooks the shoreline and is built on a bailey like mound circled by a stone wall.

Mount Norris Villas — Houses have timber front doors with plain fanlights surmounted by projecting cornices supported by console brackets. Windows have timber sash frames. The single window is modelled like the front door and there is a projecting square bay window on the opposite side of the front door with decorative pilasters.

Coastguard Cottages - This is a detached multiple-bay two-storey coastguard station, built in 1877, now in use as six private dwellings. The building is constructed in semi-coursed rubble granite with brick dressings and a slightly battered base course. Five of the houses are entered from a rear private yard to which there was no public access; the sixth has a small porch projection with a sheeted side door and sits on the south side. The pitched roof is slated and rainwater goods are cast-iron; the stone eaves course is bracketed. Chimney stacks are rendered with corbelled caps and clay pots. The building sits on a slight rise behind promenade; a narrow lane way extends across the east side. The station was converted to an army barracks in 1922 and then to private dwellings in 1925.

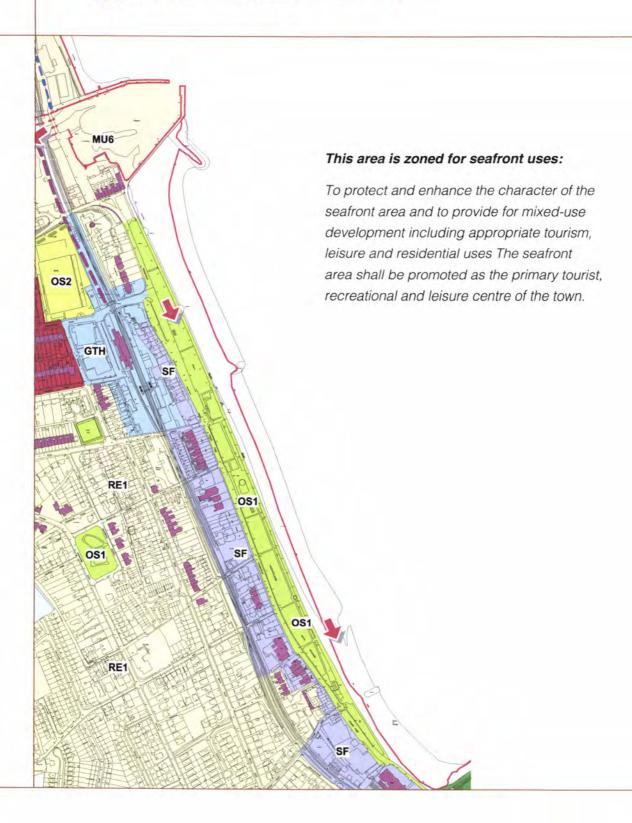
Royal Marine Terrace No.1 Hibernian Inn - This is a detached three-bay three-storey former house, built 1861, converted to a hotel c.1920 and now in use as a public house. The top is constructed in brick with granite quoins and moulded pilasters and the ground floor is finished in rusticated render. To the east and west elevations there is a recent uPVC conservatory. The panelled double front door is framed with a recent projecting pedimented door surround with paired columns. The south elevation is framed with giant order pilasters with floor height pilasters between windows. Window openings to the south have a variety of moulded pedimented dressings, with a moulded string course. The roof is finished with natural slate with cast-iron rainwater goods; the overhanging eaves are bracketed with cast-iron rainwater goods. There have been several alterations carried out on the building but it still identifiable as a Victorian house.

Royal Marine Terrace 2/5 – These are a set of four semi-detatched, three bay, two storey over basement houses built in 1862. They are constructed in brick with moulded quoins. Short flight of steps lead up to a panelled front door with free standing columns and pilasters supporting a cornice. Door has plain fanlight with semi-circular headed opening in a recessed bay. Roof has natural slate and a mixture of uPVC and cast-iron rainwater goods. Overhanging eaves have moulded brackets. Houses are accessed from short cul-de-sac.

- St. Canice's and Seadeco Houses, Harbour end of the seafront. These art deco influenced single story detached houses were built in 1937. The front door is flanked by two wide multiple pane windows, set within a recessed bay with a plain flat roofed concrete porch roof supported by two separate columns. Seadeco has been recently sympathetically renovated.
- **St. Teresa's Nursing Home -** This Terraced four-bay three-storey former house was built c.1870. A short flight of steps, with cast-iron guard rails, rises to the panelled front door; this is flanked by panelled pilasters with console brackets which support a projecting cornice. Sidelight and the fanlight are plain and all is set within a semi-circular-headed opening which has a raised moulded surround which in turn has a projecting cornice with console brackets. To one side is a canted bay, which is single-storey over basement. The pitched roof is finished with slate and has cast-iron rainwater goods and a bracketed overhanging eaves. The building is road fronted.

Fitzwilliam Terrace/Malborough Terrace - These terraces of eight four-bay two-storey over basement houses, were built 1863. The houses are finished in render with moulded dressings. Each pair of houses share a wide stair with cast-iron guard rails raising to the panelled front door which is flanked with panelled pilasters with console brackets; above is a plain fanlight and all is set within a semi-circular arched headed opening. To one side is a single-storey over basement canted bay. Some chimney stacks are missing but those remaining are rendered with clay pots. The terrace is road fronted. Many of the houses along this terrace have been altered but are are still identifiable as Victorian Houses.

Appendix B - Existing Designations/Zonings



"Bray MD LAP"

FRANCHISE CLICTION

13 SEZ 2017

WICKLOW COUNCIL

Sian & Edwin Brenner 80 Giltspur Wood Brag co Wohloce

Wicklow Country Council

13 SEP 2017

PLANNING DEPT.

80 Giltpur Wood Bray Co Wicklow

10th September 2017

Administrative Officer Planning Section Wicklow County Council Station Wicklow Town

Re: Opposition to rezoning of lands adjacent Giltspur Wood, Bray

Dear Sirs,

We would like to oppose the rezoning of the above lands for the following reasons;

Extra Traffic/Health and Safety Issues

There would be additional construction traffic for circa one year during construction. When there was building work in the estate in 2001/2002 at numbers 80 and 81 there was a major concern for the safety of the children as there was a substantial amount of construction traffic on a daily basis. At one stage one of the lorries was trying to turn, there was not enough room to manoeuvre the truck and as a result it knocked down our garden wall. It took the builders more than 6 months to rebuild our front garden wall! We do not want to see repetition of this. In addition to the safety and construction issues the roads in the estate during the building work were covered in the mud and debris from the lorries.

The rezoning would result in **another** cul-de-sac been broken through. The traffic entering and exiting the estate on Soldiers Road would be much increased, this is already severely congested in the mornings and evenings.

There would be a loss of green space/play area in our existing estate to facilitate the traffic to the new houses.

The old castle on the land is a protected structure that is 600 years old. This needs to be preserved.

There are numerous trees on the land that are protected. These will be lost if rezoning goes ahead.

Having lived in Giltspur Wood for over 18 years we feel that the estate is one of best estates in Bray and as such we would like to keep it as it is.

Yours faithfully,

Sian Brennan

Edwin Brennan

Jack Brennan





Jack Brennan
80 Giltspur Wood
Bray
Wicklow
11th September 2017

Administrative Officer
Planning Section
Wicklow County Council
Station
Wicklow Town

To whom it may concern,

I am currently living in Giltspur Wood and have been living here for the last 18 years. I am writing this letter to oppose of the rezoning of land that has been suggested in the grounds of Old Court Castle and Old Court House.

As an architect, I understand the demand for houses to deal with our nation's current housing crisis and rapidly growing population. But I firmly believe that more thought has to be put into the zoning of the new houses suggested for Bray, co. Wicklow and the Greater Dublin Area (GDA) as a whole.

With regards to the rezoning of houses adjacent to Giltspur Wood, I think it is unfair to build that many houses in such close proximity to an extremely sensitive area. Old Court Castle was first built back in 1433. Bray has managed to hold on to some of its architectural marvels like Ard Soluis by Sir Thomas Manly Deane and Kilruddery House. But it brings me great sadness to admit that Bray has lost a myriad of its architectural gems over the years such as the Turkish Baths, the International Hotel, St. Paul's School and we even lost our old Town Hall (also by Sir Thomas Manly Deane) to a fast food restaurant.

"Up this small terrace is the site where the town of Bray really began. Walter de Riddlesford was granted lands by Richard de Clare, better known as Strongbow after the Battle of the Strand where he fought valiantly. Here on a promontory overlooking the Dargle he built his castle. Unfortunately, no visible elements remain of the originally castle built by de Riddlesford in 1173."

This extract is from www.bray.ie describes another castle in Bray but hasn't survived unlike Old Court Castle and it as illustrates just how old some of these structures can be and how lucky we are to still have a few in our town.

Although the castle is the dominant structure on the site in question there is another significant structure within the lands, Old Court House. The house dates back as far as c. 1830 and deserves such high praise because it even "predates the town's railway related expansion and remarkably, considering its proximity to the town centre, its setting remains intact, thus preserving the feel of a small country house. It is in original condition and adds variety to Bray's stock of heritage buildings."

The above extract has been taken from www.buildingsofireland.ie and clearly states the importance of the old country house and its woodland setting in such a built-up area.

"Detached four-bay single-storey over basement house, built c. 1830. The house is constructed in roughcast render. The house and adjoining outbuildings form a three- sided courtyard. The panelled front door is flanked with fine timber pilasters and is set within a small projecting flat-roofed porch. Window openings to the ground floor are flat-headed with timber casement frames. To the basement level some windows are semi-circular arch-headed openings. The hipped-roof is finished with natural slate and cast-iron rainwater goods. The house is set within a large mature garden and is sited close to the ruinous castle from which it takes its name. The garden is entered through a wrought-iron gate with square stone pillars with wrought-iron railings."

The above extract is brief description of Old Court House taken from www.buildingsofireland.ie and illustrates the number of architecturally significant features this house still possesses.

Unfortunately, I can't get online access to the original planning application for Giltspur Wood as it is more than 15 years old but from memory I can recall that the planning permission for the estate was first lodged back in 1996/97. The planning application was understandably quite large but not all of the aspects of the original planning application were granted. From my knowledge, the area that has been suggested for rezoning was in fact **REFUSED** planning permission because it suffers from flooding.

In order to build houses on this area of land a flood prevention scheme must be put in place and a huge amount of ground works would need to be completed. One major issue I doubt many have considered is the effect these vibrations would have on their immediate environment. The vibrations caused by the ground works and even those caused by the heavy construction vehicles entering and exiting the site could have a detrimental impact on the existing structure of Old Court Castle, a **PROTECTED STRUCTURE** that is.

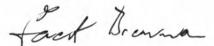
I can't even begin to imagine the cost that might be required to protect the castle from the vibrations caused by the ground works and circulation in and out of the site. On a more worrying note, if the castle was at all damaged during the proposed building works, the client of the proposed contract could come under serious scrutiny as well as the council that approved the application.

There are also a number of other reasons for opposing the rezoning of the land including the <u>increase in traffic</u> throughout the suggested construction period and the increase in traffic as a result of new houses. The <u>safety</u> of the children in the estate must come under question with this increase in traffic both during the construction works and once the houses would be completed. It would involve <u>breaking through an existing cul de sac</u>, thus affecting the prices of the adjacent houses. There would be a <u>loss of green space and wildlife</u> if the land is rezoned. There would be an additional <u>loss of green space</u> in our existing estate to facilitate traffic to new houses and a new footpath. There is also a <u>tree preservation</u> order on the trees surrounding Old Court Castle.

I would like to thank you for taking the time to read this letter in opposition to the proposed rezoning of land within the grounds of Old Court Castle. I have attached a few images depicting the castle and house throughout their lifetime, these may help demonstrate how meaningful the structures have been to locals since their completion.

Kind Regards,

Jack Brennan







Old Court Caslte, with the river Dargle in the foreground.



View of Old Court House from Driveway.

Leonora Earls

From:

Sent: 12 September 2017 14:45

sharon brennan

To: Planning - Plan Review
Cc: Cllr. Tommy Annesley: Cll

Clir. Tommy Annesley; Clir. Sylvester Bourke MCC; Clir. Pat Fitzgerald MCC; Clir. Pat Kennedy; Clir. Mary McDonald; Clir. Miriam Murphy; Clir. Vincent Blake MCC; Clir. Thomas Cullen MCC; Gerry O'Neill; Clir. Jim Ruttle MCC; Clir. Edward Timmins MCC; Clir. Joe Behan; Clir. Michael O'Connor; Clir. Clir. Steven

Clir. Joe Behan; Clir. Michael O'Connor; Clir. Christopher Fox MCC; Clir. Steven Matthews; Clir. Oliver O'Brien; jryan@greatplacetowork.ie; Clir. Brendan Thornhill; Clir. Pat Vance MCC; Clir. Tom Fortune MCC; Clir. Nicola Lawless; Clir. Grainne McLoughlin MCC; mitchelld@eircom.net; Clir. Gerry Walsh; Clir. Jennifer Whitmore; Gail Dunne; Clir. Shay Cullen; Clir. Mary Kavanagh; Clir. Daire Nolan; Clir. John Snell MCC; Clir. Irene

Winters MCC; simon.harris@oir.ie; Sebastian

Subject: Kilruddery/small Sugarloaf

Dear all,

I am writing to object in the strongest terms the proposed rezoning plan for Kiluddery and the small Sugarloaf. I live in Hollybrook park, but even if I did not live very locally I would object to this.

The one thing that we should be preserving is beautiful green space. This is what is unique to Bray, that it is on the edge of the main city in the country but also extremely scenic. As you approach Bray on the N11 the scenery dramatically changes, and all over the town the views of the small Sugarloaf and Bray head make the town what it is.

I am aware that we have a housing crisis and need to urgently build more homes, but there is alot of land around that is not as scenic as this exact part you are proposing building on. There is the hideous open space the other side of the Southern Cross for example. This is a waste land, ugly and an eyesore. Apparently it was zoned for development 10yrs ago and sold, but nothing has happened yet. So you could purchase that back (less the penalties they should have been paying for not developing) for most likely alot less than you would have to pay for Kilruddery lands.

The small Sugarloaf can be seen from all round and many people walk up and down it, exercise their dogs etc. It is a very used piece of parkland.

I am actually shocked at the proposal to build on it.

If the derelict land on the Southern cross is to to developed I hope all necessary amenities would be put in place

- better traffic management (v hard to get out of any of the estates on SCR now with the traffic), also if somehow a bike path could be put in place from the SCR to the schools at the bottom of the Vevay this would help alot, Right now it is too dangerous for all but the bravest and most experienced cyclists.

new school so not all travelling down the Vevay every day

- shops
- more facilities for children like a playground/skate park

Also obviously the N11 is a major issue in Bray, both getting on to it in the morning and the outrageous traffic every rush hour particularly at Bray north. But I assume you have plans underway to improve all that.

Best regards Sharon Brennan and Sebastian Tkacz, 35 Hollybrook Park, Southern Cross Rd Bray

Leonora Earls

From:

BRS Office [info@brennanstownrs.ie] 15 September 2017 13:17

Sent: To:

Planning - Plan Review

Subject:

Bray Municipal District Local Area Plan 2017-2023

Attachments:

Wicklow County Council Objection September 2017_.docx

Importance:

High

Dear Sir,

Please find my letter re Bray Municipal District Local Area Plan 2017-2023 attached.

I would appreciate it if you would acknowledge receipt of this letter.

Regards,

Jane Kennedy

Prennanstown Riding School



BRENNANSTOWN RIDING SCHOOL LTD.

Hollybrook, Kilmacanogue, Co. Wicklow info@brennanstownrs.ie www.brennanstownrs.ie

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

14 September, 2017

Dear Sir.

I am writing to object to the Wicklow County Council Bray Municipal District Local Area Plan 2017.

<u>Proposed new distributor road linking Kilmacanogue to our boundary with a Greenway across our lands at Brennanstown to the Southern Cross Road</u>

This is unacceptable for the following reasons:

- 1. This Greenway, cutting across the lands at Brennanstown Riding School, will have a negative impact on our riding out facilities on lands over which many tourists and clients have enjoyed riding and trekking for over 40 years, for the following reasons:
 - a) The proposed Greenway would traverse our cross country course which is used by visitors to the riding school on a daily/ weekly basis. It is also used for the training of our career students. It is clear to us that this proposed greenway would render the use of this cross country course inoperable and the riding school would lose one of its main assets.
 - b) A Greenway will create a security risk in relation to the safeguarding of our horses and ponies that graze our top fields. We already experience problems regarding anti-social behaviour, including youngsters riding our ponies while they are out resting, and holding drinking parties on our land etc. This will only be exacerbated by the easier access provided by this proposed Greenway over which we will have no control.
 - c) Further, any users of the Greenway (including families and/or children) straying into the adjoining fields to have a closer look at/to pat/to feed the horses and ponies grazing

there would be placed at a personal risk and this would be likely to have a significant impact on our business liability insurance which is already extremely high.

- 2. We also have a concern that the combination of the distributor road and Greenway is simply a precursor that will facilitate the Council in the future in implementing the original proposal contained in Wicklow County Council Development Plan 2016 and Bray and Kilmacanogue Local Area Plan 2016. This was to link the eastern roundabout at Kilmacanogue Village with the 'Woodies' roundabout on the Southern Cross Road. It has only recently come to our attention that despite the fact that the proposed route of this roadway was removed from the relevant map following strong opposition to same, the 'objective' permitting such a distributor road nonetheless remains in the County Development Plan 2016. Given this fact, one would have to seriously question whether Wicklow County Council are attempting to circumnavigate the opposition to this proposed roadway by stealth in the form of gradual amendments to the Local Area Plans, which amendments would be in compliance with the remaining 'objective' in the County Development plan. In accordance with due process and proper procedures that objective ought properly to have been removed from the County Development Plan 2016 and in failing to do so it is submitted that there has been a clear breach of proper procedures by Wicklow County Council. That objective should be removed at the next opportunity. This issue is further compounded by Transport Infrastructure Ireland's (hereinafter "Til's") findings that such a road would be superfluous to requirements and is unnecessary.
- We accept there is a need to address the access problems of the businesses and houses alongside the section of the N11 roadway approaching Kilmacanogue but this can be done by implementing the Til's proposal published in April 2017 to provide a 'local service road' here.

Proposed Rezoning of lands on the Lower Sugar Loaf

Part of the vision contained in Chapter 2 of the current Plan states 'For the Bray Municipal District to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected'. Section 2.2 Factors Influencing the Strategy defines Kilmacanogue as a 'Rural Town' where 'it is essential that growth is supported while also strictly controlled so that development is undertaken in a manner that is respectful to the character of these towns and the environmental sensitivities of the rural area.'

We feel very strongly that the rezoning of lands on the lower Sugar Loaf for residential and light commercial use runs contrary to the above.

The Little Sugar Loaf mountainous region is an 'area of outstanding natural beauty' and is, without a doubt, what has attracted so many riders to Brennanstown Riding School over the years. The proposed intrusion onto these slopes will have a totally negative impact on the views our many tourists and regular riders currently enjoy and will detract greatly from these visitors' enjoyment of their riding experience in 'The Garden of Ireland'.

We also believe this development will contribute towards the subsuming of Kilmacanogue into the outer 'suburbs' of Bray itself. These lower slopes of the Little Sugar Loaf comprise a rich and diverse habitat for populations of deer, pheasant, otter, badger and many other species of wildlife and birds - this proposal will devastate their environment – the deer will move away and the others will simply not survive.

Conclusion

For the above reasons, it is submitted that the proposed new roadway and greenway, together with the rezoning of lands on the Lower Sugar Loaf, would have a detrimental impact on the activities which have been enjoyed by both tourists and regular clients of Brennanstown Riding School at Hollybrook, Kilmacanogue since 1973. In respect of Tourism, the LAP states clearly that priority concerns in the Bray MD are "Appropriate management of existing tourism and recreational assets". Brennanstown Riding School is a major tourism asset to the wider Bray area drawing significant numbers of tourists and visitors annually. We would request that the status and success which this business has achieved in the last 44 years of operation would be afforded due respect by Wicklow County Council and that the nature and sensitivities of the business which we operate will be protected into the future.

We hope that the submission of this objection will be given full consideration by Wicklow County Council in their discussions regarding the Bray Municipal District Local Area Plan 2017.

Yours Sincerely,

Jane Kennedy

Leonora Earls

From:

' -4@-mail.aa--] triona brett

Sent: To:

Subject:

11 September 2017 11.00
Planning - Plan Review
Proposed 're Zoning of 2 plots of land rear of Charnwood and Giltspur wood

I Breda O keeffe of 32 Charnwood strongly oppose with proposed 're Zoning....

Leonora Earls

From:

Oisin Boland [oisin.boland@bridgedale.ie]

Sent:

15 September 2017 16:07

To:

Planning - Plan Review

Cc:

Catherine Hanly

Subject:

BRAY MD LAP

Attachments:

BRAY MD LAP.pdf

Good afternoon.

On behalf of Bridgedale Homes Ltd, please accept the attached submission on the Bray Municipal District Draft Local Area Plan 2017.

If you have any queries or require any further information please do not hesitate to contact me on:

Tel: 01 645 9243 **Mob:** 085 201 9437

Email: oisin.boland@bridgedale.ie

Could you please send confirmation of receipt,

Kind regards,

Oisín Boland

Graduate Planner

M: 085 2019437 DL: 01- 645 9243





T: 01-610 6546 | F: 01-6549410 | oisin.boland@bridgedale.ie | www.bridgedale.ie

Unit 11, Block F, Maynooth Business Campus, Maynooth, Co. Kildare

Subject to Contract / Contract Denied / Without Prejudice

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



September 2017

Bridgedale Unit 11, Block F Maynooth Business Campus Maynooth Co. Kildare



Table of Contents

1. Introduction	3
2. Context	4
2.1. Planning Policy Context - Wicklow County Development Plan 2016-2022 and Draft Bray Municipal District Local Area Plan 2017	4
3. Enniskerry - Kilgarron	5
3.1. Population	5
3.2. Housing	5
4. Kilgarron site	7
4.1. Background to the site	7
4.2. SLO8 Criteria	7
4.3. Suggested changes	8
5. Conclusion	10



1. Introduction

This submission on the Draft Bray Local Area Plan (LAP) is prepared by Bridgedale, an Irish real estate company with a large portfolio of residential development land in Wicklow and the Greater Dublin Area (GDA). Bridgedale employs a range of professionals including Chartered Town Planners, Surveyors and Engineers and are committed to providing high quality sustainable housing.

Bridgedale is currently engaged in construction of a number of sites in the Greater Dublin Area, including Marina Village in Greystones. Considering this, Bridgedale welcome the opportunity to comment on the draft Bray Municipal Local Area Plan 2017. This submission refers to the settlement of Enniskerry and more specifically the land zoned for housing development at Kilgarran.



Figure 1: Map of Wicklow



2. Context

The purpose of the Bray Municipal District Area Plan 2017 is to put in place a land use framework that will guide the future sustainable development of the Bray Municipal District, including the settlements of Bray, Enniskerry and Kilmacanogue. This plan is made in conjunction with the Wicklow County Development Plan which will inform and manage the future development of the area.

Wicklow's proximity to Dublin, allows for easy access to the main commercial and employment centres of the Metropolitan area. Enniskerry is situated 22km south of Dublin City centre, 5km west of Bray and approx. 2.5km west of the N11/M1. Enniskerry itself is described as a Level 5 Small Growth Town under the Regional Planning Guidelines for the Greater Dublin Area. These towns have a population range from 800-2,000 people (2011) and a targeted increase to 1,500-3,500 people by 2028. As a growth town, the settlement should provide urban housing for people from across the County and region.

2.1 Planning Policy Context - Wicklow County Development Plan (CPD) 2016-2022 and Draft Bray Municipal District Local Area Plan 2017

Wicklow CDP 2016-2022 has outlined that the existing housing stock in 2011 was 54,351 while the housing stock required by 2022 is 69,822, an increase of 15,471. The population of Wicklow has risen by 4.2% from 136,640 to 142,425 between 2011-2016 with a target population of 158,000 by 2022. To reach this housing stock and population target, it will be necessary to deliver an annual average housing completion rate of 1,838 units per annum 2011-2028. Zoning requirements have been reviewed under this plan and where a surplus was identified the land was redesignated for an alternative use. However, it was found that Enniskerry had a deficit of residentially zoned land and therefore the new Enniskerry Town plan includes additional zoned land to address this deficit.

Hierarchy	Location (as relates to County Wicklow)	Description International business core and high density population, retail and cultural activities		
Gateway Core	Dublin city centre and immediate suburbs			
Metropolitan Consolidation Town	Bray	Strong active urban place within metropolitan area with strong transport links.		
Large Growth Town I	Wicklow	Key destinations economically active towns supporting surrounding areas, located on multi modal corridor in metropolitan hinterland		
Large Growth Towns II	Greystones, Arklow	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city.		
Moderate Sustainable Growth Towns Newtownmountkennedy, Blessington		(i) In metropolitan area, strong edge of metropolitan area district service centres, high quality linkages and increased densities at nodes on public transport corridors (ii) In hinterland areas, 10km from large town on public transport corridor, serve rural hinterland as market town.		
Small Towns	To be defined in development plan	Good bus or rail links; 10k from large growth towns.		
Villages	To be defined in development plan			

Figure 2: Settlement typology



3. Enniskerry- Kilgarran

This submission focuses on the settlement of Enniskerry and in particular the land zoned for residential use and open space under SLO8 (Special Local Authority Objective 8) in the Draft LAP. The site itself is bound by the Forge Road to the east, the rear of the Eagle Valley housing development to the south west and Kilgarran Cottages to the north. The site is located approx. 150m south west of the town centre of Enniskerry. At present the boundary of the site is defined by mature trees and hedgerows. Kilgarran Cottages are listed under the National Inventory of Architectural Heritage. Furthermore, the existing access lies within the Architectural Conservation Area (ACA) which facilitates the conservation and protection of the town's heritage and preserves the architectural quality of the town. The N11 national primary route is located 2.3km east of the site.

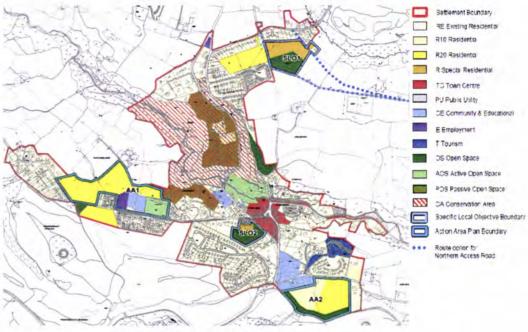


Figure 3 Enniskerry land use zoning objectives

3.1. Population

Enniskerry has seen a population rise from 1,811 in 2011 to

1,889 in 2016 according to Census figures, resulting in a population increase of 4.3%. This figure is significantly higher than the state average of 2.16%. The settlement of Enniskerry had an average age of 38.1 in 2016 compared with 36.1 in 2011. These findings indicate that Enniskerry is a desirable place to live with short commuter journeys to Bray and within close proximity to Dublin City centre.

3.2. Housing

Existing housing stock for Enniskerry in 2011 was 642 and the total housing unit requirement for the year 2022 is 1,017, which means an additional 375 houses are to be built during this period. The 2016 Census recorded that there were 652 occupied permanent dwellings within Enniskerry. The number of vacant dwellings has been reduced from 51 to 32 between 2011 and 2016. Figure 4 indicates that an additional 470





houses are required to meet the 2025 housing stock target. Given the additional zoning of residential zoned land in Enniskerry in the Enniskerry Town Plan, it is evident that Enniskerry has significant potential to grow to cater for the continuing growth towards a long term housing delivery of 1,112 by 2025 which will cater for the projected population of 2,401.

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			+66

Figure 4 Population and housing



4. Kilgarran

4.1. Background to the Site

The site which is the subject of this submission is located in Enniskerry to the south of the LP-1010 road and the Kilgarran Cottages and to the west of the Forge Road. The site is zoned both OS – Open Space and R-Special Residential in the Daft Bray Municipal LAP. The site's zonings are identified in figure 5.

The subject site is identified in the Draft LAP as Special Local Objective 8 (SLO 8). The purpose of the SLO is to guide developers as to the aspirations of the plan regarding the development of certain lands where more than one land use is proposed, with the exception that no masterplan will be required to be agreed prior to the submission of a planning application.

4.2. SLO 8 Criteria

The site itself measures c.2.5ha and the Draft Bray Municipal District Local Area Plan 2017 has outlined that the land is to be developed as a residential area in accordance with the following criteria:

- Access to the site shall strictly be from local road LP-1010 (Enniskerry – Kilgarron) and no opening, entrance or otherwise (including for construction purposes) shall be made along the Forge Road.
- Development proposals shall be accompanied by a detailed tree survey of the entire area, including all trees along site boundaries. Development proposals shall include measures to protect and re-enforce existing mature trees and proposals for new tree planting.
- The finished floor level of any development shall not exceed 90.00mOD (for the avoidance of doubt, this being the existing

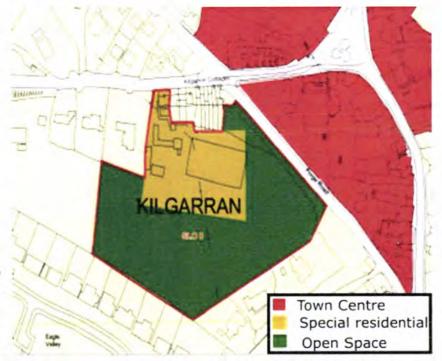


Figure 5 Kilgarran site



- ground level at the south-east of the existing jumping arena); the top ridge height of any structure shall not exceed 98.00mOD.
- 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 design of any development proposed shall have due regard to the protection of the privacy and amenity of the houses on the north side of the area and in particular, the design shall include significant screening and planting proposals.
- Any development proposals 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 remainder of the site, zoned open space, is not designated for a particular purpose (either housing or amenity use), shall be retained in its current agricultural use.

4.3. Suggested Changes

We feel that the current criterion for SLO 8 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. We do 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.

Submission on Draft Bray Municipal Local Area Plan 2017



The site is currently zoned as Special Residential which aims 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". 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 stated in SLO 8 will reflect the density and character of the surrounding area and will improve the quality of development.

Draft Bray LAP - SLO 8: Kilgarran

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.

Suggested changes

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

Submission on Draft Bray Municipal Local Area Plan 2017



5. Conclusion

This submission has largely focused on the area of Enniskerry, more specifically the land zoned for residential and open space at Kilgarran. To conclude, it is our opinion that the restriction of the site density to 40 units per hectare potentially undermines the development of the site to achieve residential development.

We respectfully request that the Council re-examine the draft criteria relating to the density on the site which in its currently format is highly restrictive and is not considered feasible for a site of this size in this location. In order to provide a housing development that will reflect the surrounding character of the area we propose that the requested unit density on the site is reduced and allows for the development of high quality housing.

Given Bridgedale's presence at Greystones Marina, Bridgedale are well placed to deliver residential housing units in Enniskerry to assist with alleviating the impact of the ongoing housing crisis which is particularly magnified in the Greater Dublin Area.

Leonora Earls

From:

David Browne [L-

Sent:

13 September 2017 15:35

To:

Planning - Plan Review

Cc:

Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance

MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan;

jryan@greatplacetowork.ie

Subject:

Proposed rezoning Kilmacanogue

Dear sirs

I formally object to the proposed rezoning and planned new road at Kilmacanogue

The 'village' is already in chaos due to poor planning and disgracefully bad traffic management. Adding more traffic will completely destroy the area on top on unnecessarily ruining an area of natural beauty.

Yours sincerely,

avid Browne 6 Rocky Valley Crescent Kilmacanogue Co wicklow

========= DISCLAIMER ===========

Any views or opinions expressed in this email are not necessarily those of Savills Commercial (Ireland) Ltd. All correspondence is Subject to Contract / Contract Denied / Without Prejudice All emails are scanned and may be opened for verification; all recognised viruses have been removed. Savills Commercial (Ireland) Ltd, registered in Dublin, Ireland. No. 119887 egistered Office - 33 Molesworth Street, Dublin 2, D02 CP04.

======= Visit our website www.savills.ie =======

arls

Caroline Burrell

04 September 2017 10:13 Planning - Plan Review

Subject: Attachments:

10:

Draft Bray LAP 2017 Submission CB

CBBrayLAP2017.doc

Dear Sir/Madam

Please see attached submission in relation to the draft Bray LAP 2017 (closing date 15th September)which I would appreciate you taking the time to read and also to act on at any Meeting that discusses this Plan, particularly in relation to any amendments and adoption of the Plan.

. 47

I would urge Bray Municipal District Council to delete any proposals to zone land for residential development at Killruddery as I believe it is unnecessary due to other brownfield and derelict sites being available for infill development in Bray including the site at Fassaroe, issues with access points, traffic and infrastructure, damage to the environment and tourism aspects as well as bad planning.

should you have any comments or queries, please do not hesitate to get in touch.

Regards Ms. Caroline Burrell

131 Belmont
Southern Cross Rd.
Bray
Co. Wicklow
Ireland

Email.

04th September 2017

Administrative Officer Planning Section Wicklow Co. Council County Buildings Wicklow 131 Belmont Southern Cross Rd. Bray Co. Wicklow

Re: Submission in relation to Draft Bray LAP 2017 - 2023

Dear AO

I am writing and submitting this submission as a resident of Bray and the Southern Cross Road which also includes views expressed to me by other residents in the area.

This submission is in relation to proposals in the current draft Bray Local Area Draft Plan 2017. Apologies, if I repeat myself through submitting information previously stated in past submissions. I believe that many of the previous issues are still relevant, still apply and have not been addressed by either the County Manger or elected members in the last Bray Local Area Plan and also contravene other documents such as the draft County Wicklow Heritage Plan 2017-2022, the Bray Environs Local Area Plan 2015 and the M11/N11 Corridor Study 04/17 amongst others (a full list is given at the end of his submission).

I would also like to point out that I 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.

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.

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 Killruddery 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.

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.

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 Killruddery) as other documents and guidelines have acknowledged:

"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."

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.

In relation to proposals for Killruddery:

(please note the spelling which has two "I"s is incorrectly spelt in the draft Plan)

A number of points are listed below which are further elaborated on in this submission by referring to other back up documentation (listed at end of submission). The draft Bray LAP proposes a number of ways in regard to sustainable development, protection of existing heritage, amenities and natural surroundings, particularly in relation to Conservation Areas (Chapter 11), so therefore:

- What benefit will there be for the community at large, particularly for those residents on the Southern Cross Road and others residing near that area, if these proposals were adopted?
- Why is there a requirement to zone lands at Killruddery for residential use when there are already significant housing opportunities through redevelopment, infill and backland developments, due to other derelict and brownfield sites available for development first (including Fassaroe, Heaton Buckleys site, Superquinn site, former Everest Centre, Rehills land)?
- Who has designated or requested this zoning? I understand that Anthony Brabazon recently verbally stated that Killruddery had not requested this zoning. Wicklow County Council? If so, how can a Council zone and designate private lands (unless there is a plan to CPO it?) Councillors?
- How are traffic, access and public transport issues currently being addressed, specifically in relation to the Southern Cross Road, going forward? Another new pedestrian crossing on the Southern Cross road opposite the entrance to the IDA Business Park is currently required (as it is only a matter of time before a cyclist or pedestrian is injured at this location).
- How will these land zoning proposals at Killruddery fit into "sustainable travel patterns" and how will they be serviced and accessed by Public Transport?
- How will this proposed development at Killruddery, if these proposals are adopted, be serviced in regard to access and traffic?
- Will Social & Affordable Units be provided as part of this development at Killruddery?
- If these proposed land zonings at Killruddery were adopted, and planning permission granted with development progressing, how will this development cater for public services such as public transport, lighting, waste & water and infrastructure?
- If planning permission was applied for and granted with future development occurring, how does Killruddery intend to deal with issues such as noise transfer, loss of privacy, view aspects etc. for existing residents who have lived in this area for over twenty years?
- If these lands were zoned at Killruddery, what guarantee is there that these proposed developments would go ahead?
- How does Killruddery intend to finance, develop, run these and any other developments longterm?

Will more lands be required for rezoning (residential, industrial) in the future?

As the Bray LAP is not a Planning Application, it proposes general zoning for different areas of Killruddery for potential development with no time limit as to when development may take place. I believe it is too vague as to what may actually may be developed with many residents expressing serious concerns over these issues. These land rezoning proposals are for a private development by private individuals so therefore should be subject to the mandatory planning permission process and not included as part of the Bray LAP.

I recognise that Killruddery is of tremendous benefit from cultural, heritage, recreation and amenity aspects as well as a being a much-valued tourism asset in the County including being an area of outstanding natural beauty (AONVB). This Demesne should be fully supported and maintained by Wicklow Co. Council and other relevant bodies with any development carried out in a long-term sustainable manner.

I would welcome any proposals proposed and adopted in this Plan relating to connectivity and Eco-Tourism between Bray Head and both Sugarloaf Mountains to join up with the Wicklow Way re walking trails, bridle paths, other amenities and facilities that would enhance this area with future sustainable tourism.

I would welcome if Wicklow Co. Council in conjunction with Killruddery as part of these proposals would consider providing areas for community gardens or allotments for the community.

If this land is rezoned with this type of housing density being approved, planning permission applied for and granted, it will only result in having another housing estate built off the Southern Cross Road which in turn will create several issues in relation to access, sewerage, water, lighting, waste facilities as well as creating further congestion and other traffic issues. I believe these current proposals are bad forward planning. This type of planning and zoning will only result in short term gain of perhaps alleviating the current housing shortage should planning permission be granted and residential development occur.

I believe 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.

I would urge all members to reject the proposals in relation to any zoning of lands at Killruddery for residential development and delete from the draft Bray LAP.

I would urge the County Manager, the Planners and the elected members to take these and residents' concerns into account, to adopt the plan but NOT ZONE the residential part of the Killruddery proposals and only zone the tourism part.

I believe this proposal in regard to proposed land zoning directly contravenes and do not meet the objectives and policies of the following sections of the draft Bray LAP:

Section 2.2.7 Infrastructure & Services (in particular the Infrastructure Strategy)

Section 2.2.8 Built Heritage & Natural Environment (in particular Recognition of the valuable heritage asset that is Kilruddery Demesne and the Heritage Strategy for Bray)

Section 2.2.10 Flood risk (Any development at Killruddery would be inappropriate as there are already flooding issues associated with Hollybrook Park and further development would exacerbate this)

Chapter 8.2 Flooding

Chapter 9 Built & Natural Heritage

Chapter 10 Key Development Areas

Chapter 11 Zoning & Land Use

The following questions need to be asked and addressed in relation to any proposals (which should include any modifications/amendments being proposed and sought through taking residents views into consideration) before adoption of this Plan:

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 Rehill lands should also be prioritised being already zoned for residential and other land uses. One site appearing to have the most potential (which I would support) 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.

This new proposed land zoning for Killruddery in the current draft Bray LAP will cover an area almost double the size of the last proposed development in the 2009-15 Bray LAP from **7.6 hectares (18 acres)** to **12 (29.6 acres)** to accommodate the building of a large residential development of **240 houses**. This proposal appears to be at odds with the Strategic Environment Assessment Statement, Alternatives at Killruddery, Land Use Alternatives 1-4 as it would appear if any of these Land Use Alternatives were adopted, the development would no longer be low-density as there would be more than a total of 240 residential units. Is there a necessity for this number of residential units at this location?

Bray LAP, Section 2.2.3: states:

"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."

If this is going to be the case regarding "**normal planning considerations**", why is there a necessity to zone lands at Killruddery at all, considering Killruddery can apply for planning permission when in a position to do so?

It also states that this LAP intends:

To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.

To promote and facilitate the redevelopment of sites in town centres, including identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre. To promote and facilitate the rapid delivery of the maximum number of housing units in the key development areas of Fassaroe and the former Bray golf club.

Rezoning of lands on the Killruddery Demesne does not fit with and would contravenes these objectives.

There is also little or no mention of addressing traffic issues on the Southern Cross Road or nearby areas which I believe is a significant flaw in this proposal. The Southern Cross Road is currently carrying **twice its intended capacity**. The road is used as a commuter route to the N11 and is daily congested at peak commuting times of 07:30 to 09:30 and 16:30 to 18:30. There is a significant build-up of traffic at peak times on the Southern Cross Road, and with a likely AADT of 12,000 or higher.

As far back as March 2000, there is reference to "existing congestion problems" from the Roughnan O'Donovan Consulting Engineers Traffic Impact Report, Ref. 00-114, 3rd March 2000, paragraph 2.1. Since this Report was drafted and published, there is now a total of nine housing estates, a Recreational Park and a Swimming Pool, which have greatly added to the traffic congestion on this road.

While I would welcome any future development of the Superquinn site on the Southern Cross Road which will be a much-needed addition to the area, it will also further add to congestion on the road. However, this may be alleviated by having access points to and from the Boghall Road. Currently there are no shops, chemist, Dr.'s clinic or other required facilities on the Southern Cross Road including a lack of input from WCC in regards to maintenance of the road, vacant premises and the general area for over the 900 residents who reside there which requires being addressed.

If these lands are rezoned at Killruddery, planning permission granted, and development occurs with up to 240 residential units built, this could result in a possibility of a further **480 cars or more** accessing and using the Southern Cross Road on top of already existing traffic.

Bray South public transport services do not provide adequate services in the Southern Cross Road area. Most Dublin Bus services route via (and stop for a period) at Bray Dart station, these all enter via the Dargle bridge or the Killarney Road. Only one limited public and one limited private service exists via the Southern Cross Road that utilises the N11/M11. If this trend was to continue, further development through zoning lands at Killruddery would only contribute to this trend, unless there is a strategy and implementation of improvements to public transport in Bray and the surrounding areas first. This should take place before any further development occurs in this area.

The M11/N11 Corridor Study (04/17) states:

(Bray Central) and Junction 7 (Bray South)."

"Over the last two decades, there has been significant development in the towns served by the M11/N11 corridor, most notably in Bray, Greystones, southeast Wicklow and north Wexford. The corresponding improvement to public transport has been limited, with only minor enhancements of rail services, and the sporadic introduction of bus routes which have relied mostly on the response of private operators to a partially regulated market.

More recently, an examination of the TII Traffic Monitoring Units (TMU) between Junction 4 (M11/M50) and Junction 5 (Bray North) reveals a 3% growth in traffic volumes between 2014 and 2015 and between 2015 and 2016. This underlines the steady and consistent growth in traffic on the M11 in the period 2014 - 2016 and it is expected that such growth will continue as the economy continues to grow.

The M11 carries a high proportion of its daily traffic during the AM Peak Period. For example, the M11 between Junction 4 and Junction 5 carried approximately 16% of the daily traffic on the route during the AM peak period (07:00 – 09:00)4. By comparison, two other major commuter routes into Dublin, the N4 and N7 carried 14% and 15% respectively during the same period. The M11 however carries lower volumes of Heavy Goods Vehicles (HGV) with the daily proportion of HGVs on the M11 at Fassaroe standing at 2.8% in 2015. This compares to the M7 at Naas which stood at 7.9%4.

Therefore, it would appear that the N11 between Junction 6 (Fassaroe) and Junction 8 (Kilmacanogue) has for the most part been in service since 1991 (at a minimum). Limited interventions or upgrade has taken place on this section of the N11 since the early 1990s, aside from the construction of Junction 6 (Fassaroe) and Junction 7 (Killarney Road) grade separated interchanges and some minor works. The bulk of these infrastructural elements were opened prior to the formation of the National Roads Authority. As such this section of the M11/N11 corridor does not reflect the current design standards applied to other more recently constructed parts of the network. When first designed, it is unlikely that the projections used included such large volumes of traffic both on the mainline and using the junctions. As such, the designs cannot adequately cater for the current demands. Once traffic passes Junction 7, the mean spot speeds (measured at 5 minute intervals) increases in the area of Fassaroe to around 60kph. Although this represents an improvement on the Level of Service compared to further south, the low spot speeds at this location is likely a function of the high traffic volumes, to the order of 4,200 vehicles northbound during the AM peak. This may also indicate a mainline capacity issue along this section. Clearly issues, including: mainline capacity; weaving conditions; direct accesses; and substandard junction arrangements (Junction 7), are key factors in the congestion and delay experienced at this point of the network. The traffic flow volumes show the links that are operating at or above 95% of the link specific practical capacity in the base year. In particular, in the AM peak, it is evident that the M11/N11 northbound and southbound flows are operating at or above capacity between Junction 6

Unless the above issues are addressed with strategies and implementation of improvements to the roads and public transport in Bray and the surrounding areas, in particular to Junction 7 (entry and exit points) for accessing the Southern Cross and Killarney roads, any further development through zoning Killruddery land on the Southern Cross Road will only impact negatively on these.

The current traffic congestion not only creates problems on the Southern Cross Road itself by causing delay to residents and local businesses, not just at peak commuting times, but more seriously when there is any kind of traffic flow pressures or incidents on the N11. At that point, the entire Southern Cross Road becomes gridlocked which is a serious safety risk in terms of emergency services access. Any further development would exacerbate this ongoing issue unless firstly addressed.

I would also **object** to any proposed development that would result in the creation of a new road through Killruddery lands, over the Little Sugarloaf slopes, or from the Southern Cross Road that would connect with either Windgates, the Greystones road, Bohilla Lane or the N11.

How will any proposed development at Killruddery (which is now proposed to cover a much larger area than in the last Bray LAP 2009-2016) if these proposed zonings were adopted, planning permission applied for and granted, cater for access to and from it and where will these points be located?

The following locations on the Southern Cross Road, which have been proposed would not be suitable for several reasons:

The entrance to Killruddery itself, is long and too narrow and would not be able to cope with extra traffic on top of the current traffic in relation to viewing the house, farmers market and other events that take place during the year at Killruddery.

The woodland area between the IDA Business Park and Hollybrook Park which is as designated a Woodland & Open Space. Residents have serious concerns regarding this if it were to change and access was permitted. Also, the Swan River is located within this area and there have been flooding issues associated with it.

Access at Giltspur Lane is not suitable, due to being a tiny, narrow lane used for private access by residents residing on it, a reservoir providing the water supply to Bray is at the end of this lane and also ti aloe Killruddery Estate to access farmland.

Access points from or through Deepdales Estate would not be suitable either due to congestion and other issues etc. None of these access points have been addressed through this draft Bray LAP.

<u>Chapter 2. Overall Vision</u>: It contravenes the vision stated in a number of ways in regard to sustainable development, protection of existing heritage, amenities and natural surroundings (such as Little Sugarloaf).

For the Bray Municipal District to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.

Section 2.2.2.: in regard to recognising historical developments and physical limitations:

Growth on the southern/southern western side must consider the historical Killruddery Demesne, the Little Sugarloaf and the desire to maintain a 'break' between the built up areas of Bray and Kilmacanogue

Solutions offered include:

The development of a major new centre at Fassaroe, west of the M11, targeted to be developed as a mixed residential, open space, community and employment area, with the potential to meet up to 60% of the new housing need of the settlement;

To designate a small area of Killruddery Demesne for additional development, for residential, open space, tourism and employment uses.

I would support the first relating to Fassaroe but object to the second point and request that the following words "additional development, for residential," be deleted from the draft Bray LAP as it is not appropriate for several reasons listed below.

Viable alternatives:

Section 2.2.9 Strategic Environmental Assessment (Appendix A)

I object to these alternative scenarios apart from 2(b).

Chapter 3: Residential Development:

RESIDENTIAL ZONINGS

It is an aim of this plan to focus new residential development into the existing built envelope of the districts' three settlements. While the 'Town Centre' zones in Bray and Enniskerry, the 'Primary Zone' in Kilmacanogue and the 'Existing Residential' / 'Secondary Zone' areas all present significant housing opportunities through **redevelopment, infill and backland developments**, these areas are not sufficient in size and scope to accommodate all of the required future housing growth in the area.

Therefore new residential development is also provided for on 'greenfield' lands zoned 'new residential' (RHD, R40, R20, R10, R-Special12) and 'Mixed Use (MD). 'Edge of centre' locations will be considered the priority location for new residential development while 'out of centre' housing sites will only be considered on the basis of integrated housing / community facilities / open space schemes that can be well connected to the built up area. Such areas may be 'Specific Local Objective' or 'Action ' areas which are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the area during the plan period.

R3 Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents. Where specified by the Planning Authority, new significant residential or mixed use development 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.

R4 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.

Chapter 5: Town/Neighbourhood Centres & Retail:

5.4 Bray Neighbourhood Centres Specific Objectives

BT4 Within designated neighbourhood centres at Boghall Road / Ballywaltrim, Vevay Road, Dargle Road, Dublin Road – Little Bray, Albert Road and walk, Fassaroe and Bray Southern Cross Road, it is the objective of the Planning Authority to protect, provide for, and improve the mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community, to a degree that is akin to their role and function as outlined in the Retail Strategy and the objectives of this plan.

Chapter 7: Tourism & Recreation:

7.3 Bray Head & Great and Little Sugarloaf Mountains

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 outstanding natural beauty' in the Wicklow County Development Plan landscape strategy**. These areas are important locations for recreation amenity both locally and for visiting tourists, with Bray Head having a Special Area Amenity Order designation. Bray Head is one of the most important natural and amenity assets in Bray and accordingly, it must be preserved as open space and protected from development pressures. Currently the building line is restricted to the lower slopes with little residential or commercial development in the area, the surrounding open space may come under development pressure in the future. **As a result, there is a need to protect and enhance this natural resource.**

Owing to the presence of important coastal habitats of sea cliffs and dry heath, and due to its high scenic

an area of local. National and European importance, and as such is afforded strict protection due to its designation under the EU Habitats Directive as a 'Candidate Special Area of Conservation' (cSAC) and as a proposed 'Natural Heritage Area' (NHA). In addition, the area is also a site of geological and geomorphologic importance. Bray Head is an area of enormous recreational and social value, and is frequented regularly by the town's residents and visitors. Care must be taken to ensure that the damaging effects of overuse, in terms of erosion and pollution are mitigated, and to ensure that the area is sustainably managed for its future conservation and preservation. In the Bray Head and Sugarloaf Mountains areas, it is the objective of the Council to: □ Protect and enhance the character, setting, and natural and geological heritage of Bray Head in order to ensure its existing and future amenity, recreational and scientific value is secured. In recognition of the area's scenic value and vulnerability to development pressure, it is the policy of the Council to implement the 'Special Amenity Area Order' (SAAO) for Bray Head. ☐ In the Bray Head SAAO, to only allow development that contributes to and enhances the function of the area as a natural and recreational amenity to the area ☐ Strictly implement the landscape protection measures for AONBs as set out in the Wicklow County Development Plan To support the development of new and existing walking trails from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way, including facilities ancillary to trails (such as sign posting and car parks) ☐ 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. 7.5 Kilruddery House & Gardens 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.

value. Bray Head has long been recognised as an area of prime importance for nature conservation. It is

I would support Section 7.5 as stated above. However, if the proposals for land rezoning for residential development for Killruddery are passed and adopted, those will contravene these sections of the draft Bray LAP.

Chapter 10: Key Development Plans:

A number of actions areas are listed such as Fassaroe, which would largely be in keeping with sustainable development due to its location, access and links to transport. This site would be more suitable for development as a brownfield site rather than zoning a greenbelt at Killruddery. However, there would be issues to address if this development was approved and went ahead in relation to provision of community facilities, schools, churches, shops, transport and traffic, infrastructure, lighting, water and waste facilities.

Specific Local Objectives: SLO 1: Killruddery:

SLO 1: Kilruddery

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.

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.
The development of these lands shall comply with the following objectives:
☐ 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.
☐ 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 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 12ha of land for new
housing (at density of 20/ha).
☐ 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.
☐ 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.
☐ 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 location of such uses are shown indicatively on the concept plan to follow, which is reflect 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 agree and welcome some of the points stated but disagree with the second. The last sentence of the second point should be deleted as the area designated is too large, unnecessary (and has been touched on earlier in this submission).

I disagree with the fourth point and would request that no further land be zoned for general "employment use" due to the large amount of other easily accessible vacant, derelict, and infill sites currently available within the town.

I disagree with the fifth point in regard to access points listed as these are not suitable or viable access points for vehicles apart from pedestrian and cyclists (on a limited basis).

Chapter 11: Zoning and Land Use:

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

I believe that the specific zoning listed in this section is clearly the right way forward as it has the potential to benefit Bray and the wider community in a sustainable manner while other proposals for land rezoning for residential/commercial/industrial development directly contravenes this section.

Bray Draft LAP Part A:

Strategic Environmental Assessment, Section 5.0, Point 5.3:

The most important strategic environmental issues relating to the Killruddery area are identified as follows:

- Certain lands in Killruddery area which are located within an Area of Outstanding Natural Beauty and are adjacent to an area under consideration for a Special Amenity Area Order are visually prominent making them sensitive to development and
- The cultural heritage and historic importance of Killruddery Estate could be cumulatively diminished by the continual selling of land facilitated by rezoning. Common to both Fassaroe and Killruddery is the need to provide energy, transport, wastewater collection and wastewater treatment infrastructure in a timely and sufficient manner.

The above points are crucial and should be addressed and I do not believe these have been listed under the present proposals for Killruddery in this draft Plan. A previous Minister for the Environment requested and directed Wicklow County Council in April 2008 to progress the Special Amenity Area Orders (in accordance with Sections 202 and 203 of the Planning and Development Act, 2000) for both Sugarloaf areas in North Wicklow.

SAAO's are created for areas of outstanding beauty or areas of special recreational value, having regard to any benefits for nature conservation. The SAAO states the objectives of the planning authority in relation to the preservation and/or enhancement of the character or special features of an area, including objectives for the prevention and/or limitation of development in the area. The SAAO enhances the protection afforded to the area as one of outstanding natural beauty by promoting it as an important recreational and education resource. The SAAO also acts as a stimulus to improve environmental quality by enhancing environmental diversity and the area's natural and manmade heritage. The main reason for implementing an SAAO is to ensure the protection of an area of local and national importance. An effect of the SAAO is that it brings certain exempted developments within planning control. It provides more detailed information to potential developers as to what is acceptable/unacceptable by stating in advance the special amenity value of the area and the clear policy of the Council with regard to the area. The Order must state the objectives of the planning authority in relation to the preservation or enhancement of the character or special features of the area, including objectives for the prevention or limitation of development in the area. Any further zoning or development should fit in with this proposed SAAO.

This is the type of objective/proposal that should be listed in the current draft Bray LAP, progressed and implemented resulting in benefits for both Bray and Killruddery from a local, national and international context particularly in regard to employment, recreation, amenities, heritage and tourism.

Location & Planning Context, Section 6.0, Point 6.2:

The settlement hierarchy places Bray, the county's Metropolitan Consolidation Town, a Level 1 town, as the principle growth settlement in the County. Development therein should be focused on:

- A consolidated approach
- Increased densities and
- Enhancement of the public transport system

This point concurs with the draft Bray LAP. If the land rezoning proposals for Killruddery are adopted, I believe they contravene this section.

Rationale for Development in the Environs Section 7.0:

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 had requested for a Special Amenity Area Order to the south. Similar to the lands

in Kilmacanogue these designations do not necessarily preclude zoning or future development. However, the 'Bray South' lands appear to be particularly sensitive due to the lands sloping quite significantly up to the Little Sugar Loaf to the south and being in part visible from the Southern Cross Road.

A limited extent of low density development is considered viable on lands within the Killruddery Demesne, but at a sufficient distance from the Estate House and in close proximity to existing employment and residential development. In addition, other uses identified as viable, such as tourism, on Demesne lands should be located to the edge of the Demesne and uses that are tied to the heritage of the Killruddery Estate. Scope exists for an element of low density residential development located to the south of and immediately adjoining the existing industrial estate that adjoins the Southern Cross Route.

The current proposals contravene this section which still applies. The above section outlines proposed viability and rationale for some development at Killruddery.

However, it needs to be asked under what basis and how will sustainable development be achieved, particularly in relation to the provision of public services such as public transport, lighting, waste & water if these proposals are adopted along with the Plan?

How does this rationale match up with the draft Bray LAP's Strategy re policies & objectives in relation to land use and high infill density?

Draft County Wicklow Heritage Plan 2017-2022:

How does this proposal (and the draft Bray LAP) fit in with the draft County Wicklow Heritage Plan 2017-2022? I believe that this proposal contravenes this plan, particularly in relation to the Habitats Directive?

In "promoting the conservation and management of Wicklow's heritage"

- 2.1 Research and develop county heritage trails/themed heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation with other organisations, communities and landowners.
- 3.1 Promote integrated conservation planning and sustainable development through heritage appraisal of development plans.

This Heritage Plan is being reviewed with a new one currently being drafted. I believe it should be noted as to how these land rezoning and development proposals at Killruddery fit into the policies and objectives of this Plan, including Biodiversity and with the draft Bray LAP, Chapter 11 in relation to Special Areas of Conservation Areas (SAC's).

Also, the Bray Urban Habitat Mapping Document, an action of a previous Wicklow Heritage Plan (though at the time it did not cover the Killruddery area due to the landowners refusing access), should be taken into account as it also has links and a bearing on these current proposals in regard to nature, flora and fauna and wildlife at Killruddery. It is unfortunate that the Urban Habitat Mapping only covers areas inside the town boundaries and perhaps would been more beneficial should all lands in the Bray LAP be included as part of the Environmental Report. Perhaps this could be an objective of the current draft Bray LAP and/or the draft Wicklow Heritage Plan?

Development Management Section 4 states:

As this Plan must conform to the policies and objectives of the County Development Plan, it is not proposed to include a repetition of the policies, objectives or strategies as set out in the County Plan. Where standards or objectives for a particular development are not included in this plan, the provisions of the County Development Plan shall apply. The LAP will however include appropriate specific development objectives and guidance, compatible with those of the County Development Plan, to assist the Development Management process in managing sustainable progress for the environs of Bray town.

This proposal to increase the density is not "sustainable progress for the environs of Bray town".

Again, I would urge the Planners in Wicklow Co. Council and elected members to **note the following in** this draft Bray LAP which clearly states the following listed below (these points should be given priority in relation to this proposed development as it is the town of Bray and surrounding areas that will most affected by this current proposed Bray Local Area Plan).

The D.T.O. Strategy 'A Platform for Change', the 'Regional Planning Guidelines for the Greater Dublin Area, 2010-2022', or the 'National Spatial Strategy 2002-2020' for the metropolitan area of the GDA:

Strategy:

The strategic vision for the spatial development of Ireland for the forthcoming twenty years is outlined in the 'National Spatial Strategy (NSS)'. This Strategy aims to achieve balanced regional development over the country of Ireland within the period up to 2020, in a way that is internationally competitive, socially cohesive and environmentally sustainable. Under the Strategy, Bray is located within the metropolitan area of the Greater Dublin Area (GDA). The strategic national role of the GDA is to consolidate its area.

To facilitate this physical consolidation, the following actions are required:

- Provision of housing and other suitable uses on vacant, derelict and under-utilised land, particularly on areas in or close to public transport corridors and areas with under-utilised physical and social infrastructure.
- Use of the Derelict Sites Act (1991) to assemble fragmented sites and to encourage the relocation to more suitable sites where there is inappropriate land use.
- Prepare urban design plans in renewal areas, to establish a framework for buildings and public spaces.
- Examine the potential of declining industrial and warehouse estates for re-development for new economic activity.

Housing:

In summary, the development approach put forth in the Guidelines, as relevant to Bray, is one which calls for an increase in overall residential densities with a high priority on the creation of elegant and exciting urban places.

- The approach also includes the location of quality employment, residential developments and amenities in proximity to each other in order to reduce the need to travel and the dependence on private transport.
- The Guidelines emphasise the need to provide adequate transportation and services infrastructure; social, community and cultural facilities; and to ensure the preservation and protection of the environment and its amenities, including the archaeological, architectural and natural heritage.
- The existing boundaries of the administrative area of Bray Town Council will be reviewed with a view to extending them to include areas of the environs of the town which are currently located within the jurisdictions of the adjoining local authorities. It is a particular objective of this plan that the town boundary is extended to include the entire area of the Southern Cross.
- In order for Bray to consolidate, overall residential densities must be increased, [as recommended under the terms of the 'Residential Density Guidelines for Planning Authorities' (DoELG, 1999)], in addition to the delivery of well designed urban environments and priority for public transport. In time this will lead to a more compact urban form, relative to the size of the population, and will reduce the growth in overall demand for travel through supporting the provision and use of public transport.
- It is the policy of the Council to encourage infill housing developments on appropriate sites where there is adequate and appropriate access for public and other services and where the proposals respect the existing character of the area.
- Potential sites for infill development may range from small gap infill, unused or derelict land and backland areas, up to larger sites that are assembled from a multiplicity of ownerships. Infill housing should have regard to the surrounding environment and the existing character
- An emphasis will be placed on achieving a joined-up and co-ordinated approach between the three relevant planning authorities such that the Bray Environs Area may in future be perceived as a single entity.

Transport:

In line with the objectives of the D.T.O. Strategy 'A Platform for Change', the NTA Greater Dublin Area Transport Strategy 2016-2025, the 'Regional Planning Guidelines for the Greater Dublin Area, 2004-2016', and the 'National Spatial Strategy' for the metropolitan area of the GDA, the following are the strategic transportation objectives for Bray:

- maximise access to and encourage use of public transport, cycling and walking;
- discourage private car based travel;
- develop an extensive, effective, high quality and integrated network for rail, bus, road, cycling and walking;
- integrate land use and transportation planning objectives so that sustainable urban patterns and communities are formed, where the distance between employment, residential, leisure and commercial land uses are reduced;

- develop an improved mesh of roads, which are safe and provide for the needs of all road users. The Council recognizes the fundamental link between transport and land use. In this regard, the D.T.O. Strategy provides the following guidance that is relevant to the development of Bray:
- the resource of public transport corridors should be maximised by concentrating development along these corridors at public transport nodes (rail stations, bus stops and interchanges);
- development should be phased to maximise the utility of existing public transport services and to avail of new services as they come on stream;
- reservations for public transport should be protected in the design of new developments;
- development near public transportation nodes should comply with the following principles:
- detailed layouts and design of developments which reflect the importance of walking and cycling as transportation modes by providing safe and direct access to local services
- increased density should be promoted close to public transport nodes;
- · mixed-use developments should be encouraged;

All of the above policies and objectives should be noted as of primary importance and taken into consideration before any of the proposed modifications put forward in this Plan are adopted as this current draft Bray LAP will have a direct impact on the town and its environs (which is one of the reasons that a joint approach should be taken by Wicklow Co. Council and Bray Municipal District Council).

How does these land rezoning and development proposals for Killruddery fit in with the draft Bray LAP, Chapter 8 Infrastructure, specifically in relation to Public Transport Objectives, Roads, Road objectives? I believe they would contravene these objectives.

Wicklow County Development Plan 2016-2022:

These statutory requirements must be taken into consideration in relation to the draft Bray LAP. I believe the land rezoning and development proposals at Killruddery would contravene these particularly in relation to:

"proper planning and sustainable development" and "that the development objectives in the development plan are consistent, as far as practicable, with the conservation and protection of the environment."

1.4 Statutory Content of the Plan

The Planning and Development Act 2000 (as amended) sets out the statutory requirements regarding the content of a development plan.

As required by the Act, the Wicklow CDP 2016-2022 is consistent, in so far as is practicable, with such national plans, policies and strategies as the Minister determines relate **to proper planning and sustainable development**. In this regard, Appendix 13 sets out a list of statutory provisions, plans, policies and strategies that set the context within which the plan is framed and which have influenced the strategies and objectives of the plan.

Section 28 of the Act requires the Planning Authority to append a statement to the development plan including information which demonstrates how the Planning Authority has implemented the policies and objectives of the Minister, contained in Ministerial Guidelines, when considering their application to the area of the development plan. This statement is included in Appendix 12. In making the plan, the Planning Authority shall have regard to the development plans of the adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities, except where the planning authority considers it to be inappropriate or not feasible to do so. The Planning Authority shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining planning authority. Accordingly, the objectives of this plan have been prepared having regard to the plans of the adjoining planning authorities of Dun-Laoghaire Rathdown, South Dublin, Kildare, Carlow and Wexford.

Wicklow County Council, being a planning authority within the Greater Dublin Area (GDA) shall ensure that its development plan is consistent with the transport strategy of the National Transport Authority. The development plan shall include a 'Core Strategy' which shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Spatial Strategy and the relevant regional planning guidelines (which in the case of this plan is the Regional Planning Guidelines for the Greater Dublin Area 2010-2022). The 'Core Strategy' is set out in Chapter 2 of this plan.

The written statement shall include a separate statement which shows that the development objectives in the development plan are consistent, as far as practicable, with the conservation and protection of the environment. The Environmental Report (included as part of the draft development plan) and Strategic Environmental Assessment Statement (included upon the 'making' of the development plan) form part of the development plan process. It is considered that these reports satisfy the statutory requirements in this regard.

Section 10(2) of the Act includes a list of the objectives that shall be included in a development plan. A list of additional objectives that may be included in the plan are set out in the First Schedule of the Act. These lists are included in Appendix 14.

Appendix II Non-Technical Summary of the Environmental Report of the Bray Environs LAP 2009-2015 SEA stated:

5.3 Alternatives for Kilruddery

5.3.1 Overview of Evaluation Brownfield vs. Greenfield Development

All four alternatives provide for growth by way of greenfield development. Alternative 3 provides a balance between brownfield/infill development while Alternatives 1, 2 and 4 provide for greater extents of greenfield development. Alternatives 1, 3 and 4 provide for E2 Employment uses at the Foggy Field to the immediate north east of the Kilruddery Estate. This provision could encourage ribbon development south of the roundabout in the direction of Greystones.

Greenhouse Gas Emissions and Car Dependency

The interaction between all 4 Alternatives and the reduction of greenhouse gas emissions and the minimisation of car dependency is uncertain. It would be important that a sufficient public transport service is provided to all lands which are zoned for residential and employment development by the LAP.

Architectural and Archaeological Heritage

There are 6 entries to the Record of Monuments and Places (RMP) within the Kilruddery lands including a possible burial ground, Kilruddery House and 2 Fulacht Fias. It is possible that there is subterranean archaeological heritage beneath the subject lands which has not been identified to date. In order to prevent unnecessary impacts on archaeological heritage it will be necessary to carry out pre-development archaeological testing surveying, monitoring and recording.

By providing for development in the vicinity of the Protected Structure of Kilruddery House potential conflicts could arise between new development and the protection of this structure, including its curtilage (the parcel of ground immediately associated with the structure or in use for the purposes of the structure). The cultural heritage and historic importance of Kilruddery Estate could be cumulatively diminished by the continual selling of land facilitated by rezoning. Consequently, the form of any proposed development within Kilruddery Demesne should be informed by the protected status of the Kilruddery House and its curtilage and the consequent need to uphold the heritage value of the estate.

Landscape

The eastern lands at Kilruddery are classified under the Wicklow County Development Plan 2004-2010 County Landscape Characterisation as being within a Corridor Area while the western lands are classified as being within an Area of Outstanding Natural Beauty. The Area of Outstanding Natural Beauty classification indicates that the western lands are of a high sensitivity and value on a County level. In addition, the eastern lands in Kilruddery are adjacent to an area under consideration for a Special Amenity Area Order.

All alternatives propose E2 Employment uses to the south of the existing business park. These lands are particularly visually prominent and sensitive due to the elevated and sloping character of the lands which are located in the vicinity of the Little Sugar Loaf. This land is highly visible from the Southern Cross Road and from other parts of Bray. Development of these lands should have regard to existing topography and minimise visual encroachment on the lower slopes of the Great Sugar Loaf.

Alternatives 1, 2 and 4 propose R4 low density residential development on the slopes of the Little Sugar Loaf. This development would be likely to significantly and adversely affect the landscape and would not be likely to be fully mitigated.

CAAS for Wicklow County Council 31Appendix II Non-Technical Summary of the Environmental Report of the Bray Environs LAP 2009-2015 SEA CAAS for Wicklow County Council 32

5.3.2 Summary

Implementation of Alternative 3 for Kilruddery would be likely to result in the least amount and least severity of adverse effects on the environment while implementation of Alternative 4 for Kilruddery would be likely to result in the most amount and most severity of effects on the environment.

The potential conflicts and associated adverse effects of Alternative 3 would be likely to be avoided or reduced by complying with various aspects of the land use zoning objectives of the LAP and mitigation measures including those which are recommended to be integrated into the Plan (provided in Section 9 of the Environmental Report).

5.3.3 The Kilruddery Component of the LAP

The Kilruddery component of the LAP that emerged from the Plan preparation process has a close correlation to Alternative 3. The evaluation summarised above for Alternative 3 is generally applicable for the Kilruddery component of the LAP.

The Alternatives that were examined were produced and evaluated at an earlier - more embryonic - stage to facilitate evaluation and selection of a plan. Consequently there are a number of differences between Alternative 3 and the Kilruddery component of the LAP. These differences are indicated on Figure 5.1 and Figure 5.2. The differences are identified and discussed below.

Difference 1

Lands zoned by Alternative 3 to the immediate south of the existing business park as Employment (E2) are zoned R3 New Residential Low Density by the LAP. These lands together with the adjacent lands zoned Open Space (OS) are not configured in the same way in the LAP as they are in Alternative 3 - the lands zoned New Residential Low Density in the LAP cover a greater area than those zoned Employment in Alternative 3.

Although this difference does not change the assessment provided for Alternative A above, it is noted that the LAP provides that the elevation of the residential development shall be confined to a contour of no higher than 65 metres. This provision will positively impact upon the protection of the landscape.

Difference 2

The LAP provides for a buffer between the Kilruddery Tourism zone and the Swanbrook and Hollybrook housing developments that is not provided for by Alternative 3. This buffer will positively impact upon the protection of the context of Kilruddery Demesne and the protection of ecological connectivity.

Difference 3

The E2 Employment - Industry/Business Park zoning of the Foggy Field area in Alternative 3 is zoned T - Tourism in the LAP. This difference does not change the assessment summarised above for Alternative 3.

Difference 4

The majority of lands within the Plan boundary of Alternative 3 are not attributed a zoning. The LAP attributes a Green Belt zoning objective to these lands. As this Green Belt zoning will significantly restrict new built development, this difference would be likely to have significantly beneficial impacts upon the protection of the landscape, architectural heritage, archaeological heritage, ecological connectivity and non-designated flora and fauna.

According to this Report, none of these proposals would be completely viable for various reasons and should be noted in relation to this current draft Plan.

The sections listed above also tie in with the draft Bray LAP, Chapter 9 Built & Natural Heritage objectives.

How will rezoning of lands at Killruddery meet with these objectives? I believe they would contravene these objectives.

It also states that:

6.3 Monitoring

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored, puts forward proposals for monitoring the likely significant environmental effects of implementing the LAP. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the LAP is achieving its environmental objectives and targets - measures which the LAP can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

The Environmental Report identifies indicators - which allow quantitative measures of trends and progress in the environment over time. Measurements for indicators should come from existing monitoring sources and no new monitoring should be required to take place.

A preliminary monitoring evaluation report on the effects of implementing the LAP will be prepared within two years of the making of the Plan. Wicklow County Council are responsible for collating existing relevant monitored data, the preparation of a monitoring report, the publication of this report and, if necessary, the carrying out of corrective action.

The Social & Community Infrastructure policies of the Draft LAP shall be reviewed by the Forward Planning Section of the Council in conjunction with the Integrated Planning Sub group of Wicklow County Development Board. Where any recommendations subsequently made are deemed to be material the LAP shall be amended in accordance with the provisions of the Planning and Development Acts 2000 – 2006.

I believe aspects of the Bray LAP Environs Plan sections which clearly outline the situation in regarding to development and zoning of lands at Killruddery still apply and should be taken into consideration for the current draft Bray LAP.

I would also express concern about this proposal as to who members of this Sub Group may be. I would request that in the interests of sustainable planning, culture and heritage, the make-up of this group would include members of the public and persons who have experience in these areas. Also, that this sub group would, before any changes occur, liaise with Councillors and the public alike.

I recognise that Killruddery is of tremendous benefit from a cultural and heritage point of view as well as a valuable tourism asset in the County as well as being an area of outstanding natural beauty and should be fully supported and maintained, but believe it is imperative that any development be carried out in a long-term sustainable manner.

I believe these proposals for rezoning land and development at Killruddery for any residential, industrial and commercial development is bad forward planning. If the land is rezoned with this type of housing density being approved, all that will be achieved is having another housing estate built off the Southern Cross Road which in turn will create more sewerage, water, lighting, waste facilities, access points and infrastructure being required as well as creating traffic issues.

I would urge Councillors and officials of Bray Municipal District and Wicklow County Council to reject this proposal and delete from the draft Bray LAP.

Many of the points stated in the various documents listed above should also be noted and applied to any future developments, ensuring that development is carried out in a joined up and sustainable manner with all infrastructure, transport, community and other facilities provided either firstly before any residential development takes place or should occur at the same time.

In relation to the seafront in Bray, I believe 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. I 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). I 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.

In relation to amenities for Bray, I believe 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.

I would be grateful if any questions etc. were clarified and answers were provided by WCC.

¥ours sincerely



Ms. CAROLINE BURRELL Bray & Southern Cross Road Resident

References:

Adopted Bray Environs Plan
Appendix II Non-Technical Summary of the Environmental Report of the Bray Environs LAP 2009-2015 SEA
Bray Strategic Environmental Assessment Statement
Bray Town Development Plan 2011-2017
D.T.O. Strategy 'A Platform for Change'
Draft County Wicklow Heritage Plan 2017-2022
M11/N11 Corridor Study Needs Assessment Report April 2017 Broughan & O'Donovan
National Spatial Strategy 2002-2020
NTA Greater Dublin Area Transport Strategy 2016-2025
Regional Planning Guidelines for the Greater Dublin Area, 2010-2022
SEA of the Bray Environs Local Area Plan 2009-2015

Leonora Earls

From:

Dave Burton [

Sent: To: 11 September 2017 18:46 Planning - Plan Review

Cc:

' (leemalone@gmail.com)'

Subject:

BRAY MD LAP

To whom it may concern,

My wife and I are currently the owners of 36 Giltspur Brook and are very concerned about the potential traffic access route to the new housing development planned for lands adjacent to Giltspur Brook and Giltspur Wood. We have lived in this quiet cul de sac for many years and are very happy here.

. . 4 ----1

We are concerned that the access route to this new development could run right past our front door. This would severely disrupt this quiet and settled community neighbourhood that we have worked so hard to create and are so proud of. We have created a safe and secure environment to raise our children.

We really don't think that access from the Boghall road is suitable for more traffic. At the moment, with residential parking, there is not even the capacity for cars to easily pass each other in opposite directions. There is always the need of one car to pull in to allow another to pass.

Road access through the cul de sac would cause parking issues for all of the residents.

We have endured some anti-social behaviour and indeed burglaries in the area and feel that opening this area up further would lessen the security of our area.

However, probably most importantly, we would lose the wonderful green spaces that the originally planning for in this estate provided. The river area with its trees and wildlife would be badly impact and we would lose the space where our children and pets can play.

Yours sincerely, Dave Burton. 36 Giltspur Brook

Lisa Rothwell

From:

Dave Burton [[

Sent:

[moc *----* 11 September 2017 18:46 Planning - Plan Review

To: Cc:

(leemalone@gmail.com)'

Subject:

BRAY MD LAP

To whom it may concern,

My wife and I are currently the owners of 36 Giltspur Brook and are very concerned about the potential traffic access route to the new housing development planned for lands adjacent to Giltspur Brook and Giltspur Wood. We have lived in this quiet cul de sac for many years and are very happy here.

We are concerned that the access route to this new development could run right past our front door. This would severely disrupt this quiet and settled community neighbourhood that we have worked so hard to create and are so proud of. We have created a safe and secure environment to raise our children.

We really don't think that access from the Boghall road is suitable for more traffic. At the moment, with residential parking, there is not even the capacity for cars to easily pass each other in opposite directions. There is always the need of one car to pull in to allow another to pass.

Road access through the cul de sac would cause parking issues for all of the residents.

We have endured some anti-social behaviour and indeed burglaries in the area and feel that opening this area up further would lessen the security of our area.

However, probably most importantly, we would lose the wonderful green spaces that the originally planning for in this estate provided. The river area with its trees and wildlife would be badly impact and we would lose the space where our children and pets can play.

Yours sincerely, Dave Burton. 36 Giltspur Brook.

Lisa Rothwell

From:

Lee Malone [

Sent: To: 02 September 2017 16:40 Planning - Plan Review

Cc:

Dave

Subject:

Bray MD LAP

Hi,

I'm contacting you regarding planned development at the back of Giltspur Wood / Giltspur Brook - in particular, the planned access route/point.

We are residents in Giltspur Brook for 12 years, and we chose to live here because it is a very quiet cul-desac. This suits us as it is a quiet, safe and secure neighborhood. It is safe for children to play outside as there is no through road.

Our house backs on to the new development & we strongly object to a through road from our cul-de-sac through to the new development / estate. We object on the grounds of safety, security and more importantly traffic. We will be meeting with Joe Behan to discuss further and make our objections known.

I hope you take our strong concerns on board, and we look forward to hearing from you.

Lee & Dave Burton
@ 36 Giltspur Brook

Kilmolin, Enniskerry, Co. Wicklow.

14th. September 2017

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

re. Bray Municipal District Local Area Development Plan for 2017 - 2023

Dear Sir/Madam.

I wish to make a submission to have a section of my lands in Kilmolin/Kilmalin in the Enniskerry area included in the 'Bray Municipal District Local Area Development Plan for 2017 – 2023'. This portion of land is part of a field and it is shown on the enclosed map (which is dated 7th. April 2017). This section of land is adjoining an existing Zoned Residential Area.

I wish to have this portion of land included in the upcoming Local Area Development Plan in order that it can be used for residential accommodation for members of my family. It will not be for sale or for speculative purposes.

Thanking you, in anticipation.

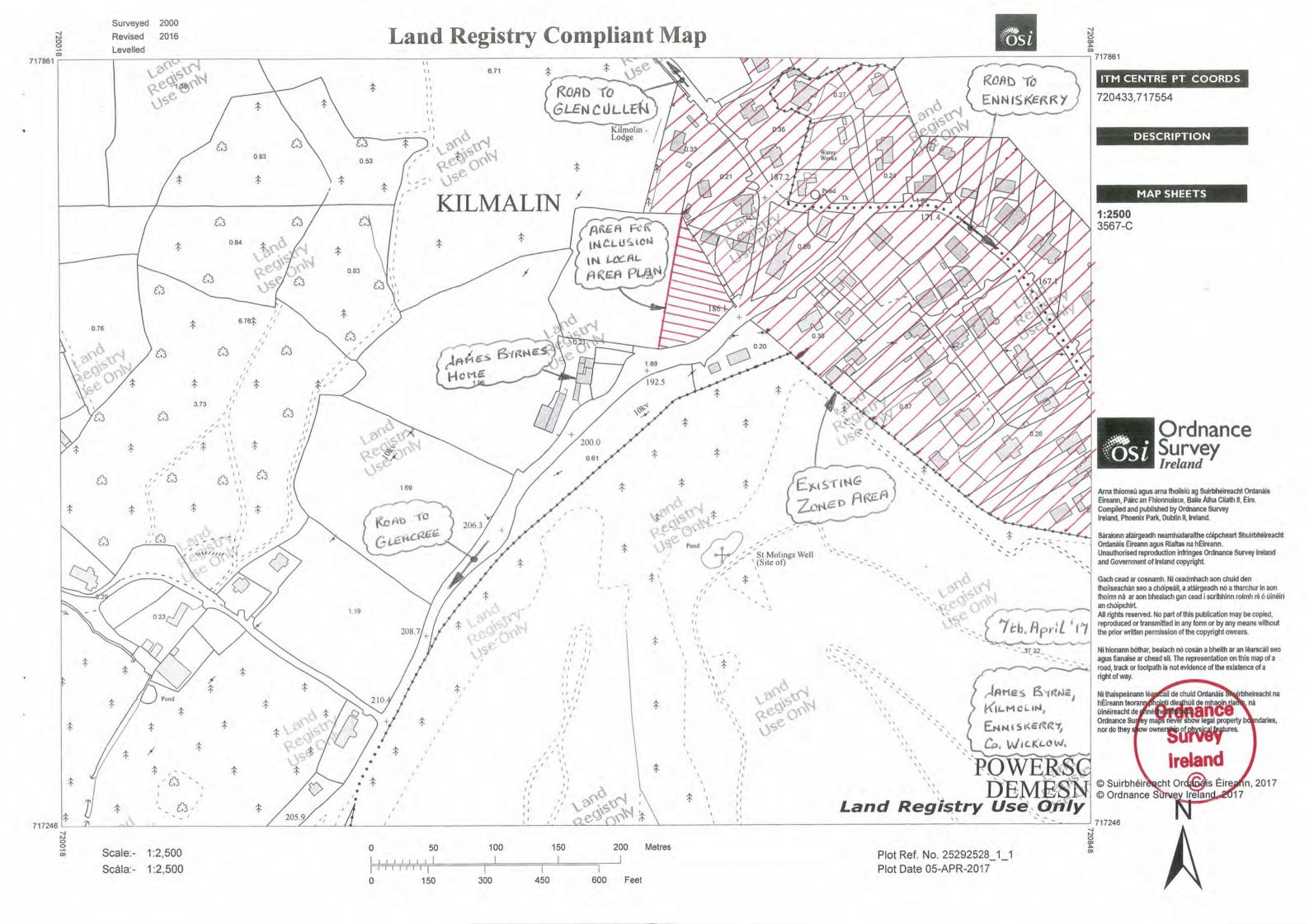
Yours faithfully.

James Byrne.

WICKLOW COUNTY COUNCIL

1 4 SEP 2017

PLANNING DEPT.



Leonora Earls

From:

tracey byrne [1

Sent: To: 05 September 2017 09:44 Planning - Plan Review

Subject:

Bray local area plan

I am a resident on the southern cross and I strenuously object to the proposals in the 2017 Bray local area plan on the grounds that it will destroy an area of national beauty, cause flooding in an already prone to flooding and increase traffic in an area that is already congested both morning and evening. The southern cross does not have the infrastructure to cope with the population currently living there and I feel that this change in zoning would have a negative effect on the entire locality. I look forward to hearing from you soon. Kind regards Tracey Byrne

Leonora Earls

From:

Sent:

To:

Subject:

Pam Byrne [
15 September 2017 16:54
Planning - Admin
REZONING DEVELOPMENT PLAN GILTSPUR WOOD : R20 "New Residential"

Attachments:

Document1.docx

Importance:

High

Please see attached letter which has also been sent by fax and post

Pamela and Patrick Byrne: Eoin Byrne, Cathal Byrne 48 Giltspur Wood, : Bray, Co Wicklow 15/09/2017

Administrative Officer, Planning Section, Wicklow Co Council Station Rd Wicklow Town

Ref: BRAY MD LAP

Dear Administrative Officer:

We are writing to make a submission in objection to the rezoning of land, adjacent to Oldcourt House and Giltspur Wood, as R20 'New Residential'. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017). We have outlined several reasons for this objection.

a) Health and Safety

- To gain access to the field would require breaking through an existing, safe and child friendly, cul de sac which has been part of the estate for over 20 years.
- The popular and child friendly green area is essentially the playground of the estate; Access to the land would bring large amounts of traffic directly beside the green area bringing an increased risk to child safety.
- Any construction required on the rezoned land would result in large amounts of heavy vehicles and construction traffic going through the existing estate for a prolonged period. The route this traffic would take is directly past and alongside the popular green and would be a major concern for the children playing in the estate on the large green area.

b) Traffic Congestion

Recent changes to the direction of traffic in the area, Soldiers Road, coupled with the neighbouring new development, Castlelynn, have dramatically increased the traffic on the road and the road usage in the vicinity. New development in the area would exacerbate this further.

c) Flood Risk

The OPW Fluvial Flooding map tool outlines that the Oldcourt River and surrounding land, including the proposed re-zoned field, is included within the 1 in 100-year flood zone.

d) Tree Preservation Order

There is a tree preservation order which covers all the trees on the proposed rezoned site and all the land surrounding the site. "Order no. 5- Oldcourt House and Vevay House, Swan River".

e) Wildlife

The proposed rezoned field and the surrounding land supports a rich and diverse set of wildlife.

f) Protected Structures

There are four protected monuments adjacent to the land. Developing on the proposed rezoned land would position new buildings and structures extremely close to these precious monuments, risking their preservation and future.

We would ask that you consider our submission and objections in the hope of preventing the rezoning of the land we have outlined.

Sincerely,

Pamela, Patrick, Eoin and Cathal Byrne

Lisa Rothwell

From:

Orla Fenelon I

Sent: To:

15 September 2017 17:00

Planning - Plan Review

Subject:

Bray Municipal District Draft Local Area Plan 2017- Observation submitted

Dear Sirs,

We wish to submit the below observations taking into consideration ot the Draft Local Area Plan 2017.

Whilst we are very supportive of the vision of Local area plan we have a number of concerns which we would like to see be taken into consideration.

1. Parking and Traffic

he 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.

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 resulting 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

Can more detail be provided as to how the traffic and parking challenges expected as a result of this plan have

- Been estimated and quantified
- Will be addressed o)

2. Florentine Centre

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?

3. Built Heritage and Natural Environment

This section 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.

Orla & Robert Byrne 9 Eglinton Road Bray

C39a

Leonora Earls

From:

Michelle Stephens Byrne L 15 September 2017 17:54

Sent: To:

Planning - Admin

Subject:

rezoning of lands adjoining Giltspur Wood, Bray, Co Wicklow

Dear Council Members

REF: R20 'New Residential'. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017).

I am writing to oppose the rezoning application and hereby wholly and irrevocably object to this proposed rezoning.

My own children have grown up using the cul de sac and green area since we moved into the estate in August 1997. This has always been and continues to be, an important amenity for all residents but especially the children using it as a safe and friendly play area.

With the already newly built houses in Oldcourt this will only increase traffic congestion and we already have restrictions with the newly imposed one-way system bring all traffic to Old Soldiers Road.

There are other concerns such as:

- 1. Flood Risk
- 2. Tree Preservation Order
- 3. Wildlife

I would ask that you seriously consider this submission and objections in the hope of preventing the rezoning of the land.

Please acknowledge receipt of this email. Thank you.

Sincerely, Michelle Stephens Byrne 54 Giltspur Wood Bray, Co Wicklow

Leonora Earls

From:

Noel Cafferkey

Sent:

06 September 2017 23:33

To:

Planning - Plan Review

Cc:

Cilr. Tommy Annesley; Cilr. Sylvester Bourke MCC; Cilr. Pat Fitzgerald MCC; Cilr. Pat Kennedy; Cilr. Mary McDonald; Cilr. Miriam Murphy; Cilr. Vincent Blake MCC; Cilr. Thomas Cullen MCC; Cilr. Pat Doran MCC; Gerry O'Neill; Cilr. Jim Ruttle MCC; Cilr. Edward Timmins MCC; Cilr. Joe Behan; Cilr. Michael O'Connor; Cilr. Christopher Fox MCC; Cilr. Steven Matthews; Cilr. Oliver O'Brien; jryan@greatplacetowork.ie; Cilr. Brendan Thornhill; Cilr. Pat Vance MCC; Cilr. Tom Fortune MCC; Cilr. Nicola Lawless; Cilr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cilr. Gerry Walsh; Cilr. Jennifer Whitmore; Gail Dunne; Cilr. Shay Cullen; Cilr. Mary Kavanagh; Cilr. Daire Nolan; Cilr.

John Snell MCC; Cllr. Irene Winters MCC

Subject:

Objection to rezoning of lands on Southern Cross

To whom it may concern

We strongly object to the rezoning of lands on Southern Cross behind our estate in Swanbrook on the following grounds:

- Increased traffic through our estate will cause a significant problem of trying to get onto Southern
 Cross at peak times which is already a major problem
- Increased traffic will also pose more danger to our small children
- There is already a severe lack of green areas and the nearest playground is over 1 mile away from us
- Flooding in Hollybrook in gardens will be more prevalent with the addition of an additional 240 houses.
- The promise of retail units since 1997 has still not come to frutition and the nearest retail/shops to us are over 1.2 miles away
- Severe lack of public transport cannot cope with additional new houses
- A undependable bus service supplied by finnegan bus which does not turn up half the time or is severely late I feel impacts on the increase of a Dublin Bus schedule as the owner has a past relationship with county council
- The natural beauty of the area will be greatly diminished.
- We already have anti social behaviour and very little Garda presence

To note we already put up with Kilruddery hosting to Hell & Back which causes mayhem around out estate with cars parking everywhere and litter all along the road which is never all picked up and Kilruddery only end up lining their own pockets as the majority of visitors to the estate are transient day trippers and its the locals like us who have purchased annual passes for the last 10 years that keep the place going and enjoy its charm and serenity which could soon be all but gone if this goes ahead.

Please confirm back to me that you have received this email out of courtesy @planrevview Many thanks.

Noel & Liz Cafferkey, 76 Swanbrook, Southern Cross (and 3 very small worried children)

Kind Regards

Noel Cafferkey Action Recruitment -



Noel Cafferkey Managing Director

Email: noel@actionrecruitment.ie

Mobile: +353 87 2145990

Web: http://www.actionrecruitment.ie