

C242

**Leonora Earls**

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**From:** Mary-Anne MPBA [mailto:maryanne@mpba.ie]  
**Sent:** 15 September 2017 10:23  
**To:** Planning - Plan Review  
**Subject:** Bray LAP  
**Attachments:** Shopfront letter.pdf

Dear Sir Madam

Please find attached submission on the Draft Local Area Plan

Regards  
Mary-Anne

Mary-Anne Parsons, Architect  
B.A.S. B.Arch (MRIAI) (SACAP)  
5 Stable Lane, Bray Co. Wicklow  
A98 XC42

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

MPBA Architects  
5 Stable Lane, Bray, Co. Wicklow

15<sup>th</sup> September 2017

**RE: Draft LAP submission, SHOPFRONTS**

Dear Sir/Madam

*We welcome the objective within the Draft Bray Local Area Plan to ‘improve the quality of the overall appearance of the town and seafront area, including ..... shopfront improvements.’ We believe an improved overall appearance will encourage footfall, business and as a result the overall viability of the town. Bray Main Street, Quinnsboro Road and Florence Road have a rich heritage however the quality of shopfronts result in a view of low cost and low quality wares.*

*As such we are of the opinion the clear guidance is required for retailers, with simple guidelines to provide quality shopfronts, much of which can be undertaken without planning permission or through a Section 5 process. There are numerous shopfront guidelines which have been produced by County Councils through the country. We are of the opinion that a simple reference check is required, which is user friendly for store owners and businesses, and this should form part of the Local Area Plan.*

*We acknowledge the guidance within the Wicklow Development Plan for shopfronts, and appreciate that this forms an overall guideline for Bray. We do however suggest that it is an objective of the Local Area Plan to:*

*Undertake an audit of all shopfronts in Bray Main Street, Quinnsboro Road and Florence Road is undertaken. Recommendations and suggestions for improvements are to form part of the audit process.*

*We are of the opinion that shop owners require guidance to improve the appearance of the main retail area and that Bray Municipal District, through the development plan are best suited to provide this. We are aware that there are many individuals and groups that would be willing to liaise with Bray Municipal district in the preparation of such an audit.*

Kind regards

---

**Mary-Anne Parsons**  
**BAS. BArch. SACAP MRIAI**

C243

Trish Pempelfort &  
Dale Longmore  
38 Giltspur Wood  
Bray  
Co Wicklow  
12 September 2017

Wicklow County Council  
15 SEP 2017  
PLANNING DEPT.

Administrative Officer  
Planning Section  
Wicklow Co Council  
Station Rd  
Wicklow Town

WICKLOW COUNTY COUNCIL  
15 SEP 2017  
Corporate Affairs

**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). Please see below reasons for this objection;

**1. Health and Safety**

- To gain access to the field would require breaking through an existing, safe and child friendly, cul de sac.
- 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. 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.

**2. 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. The traffic light system on the Killarney road allows only a small number of cars through the lights. This already results in congestion along the road in and out of the estate. New development in the area would exacerbate this further.

**3. 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.

**4. Wildlife**

- The proposed rezoned field and the surrounding land supports a rich and diverse set of wildlife. This area is extremely close to wildlife and development may well disrupt and displace wildlife.

**5. 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".

**6. 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,

Trish Pempelfort

Dale Longmore

**Leonora Earls**

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**From:** Trevor Sadler  
**Sent:** 15 September 2017 13:52  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017 - Submission on behalf of Pizarro Developments Ltd (in receivership)  
**Attachments:** Bray MD LAP Submission on behalf of Pizarro.pdf

To Whom It Concerns  
Please find attached submission to the Bray MD Draft LAP 2017 on behalf of Pizarro Developments Ltd (in receivership).  
Please confirm receipt by return email.

Regards

Trevor Sadler  
Director  
**McGill Planning Ltd.**  
**7 Fitzwilliam Street Upper**  
**Dublin 2**  
Email:  
Tel:  
Mob:  
Website: [www.mcgplanning.ie](http://www.mcgplanning.ie)  
Twitter: @McGillPlanning

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Senior Administrative Officer,  
Planning Department,  
Wicklow County Council,  
Whitegates,  
Wicklow Town.

15<sup>th</sup> September 2017

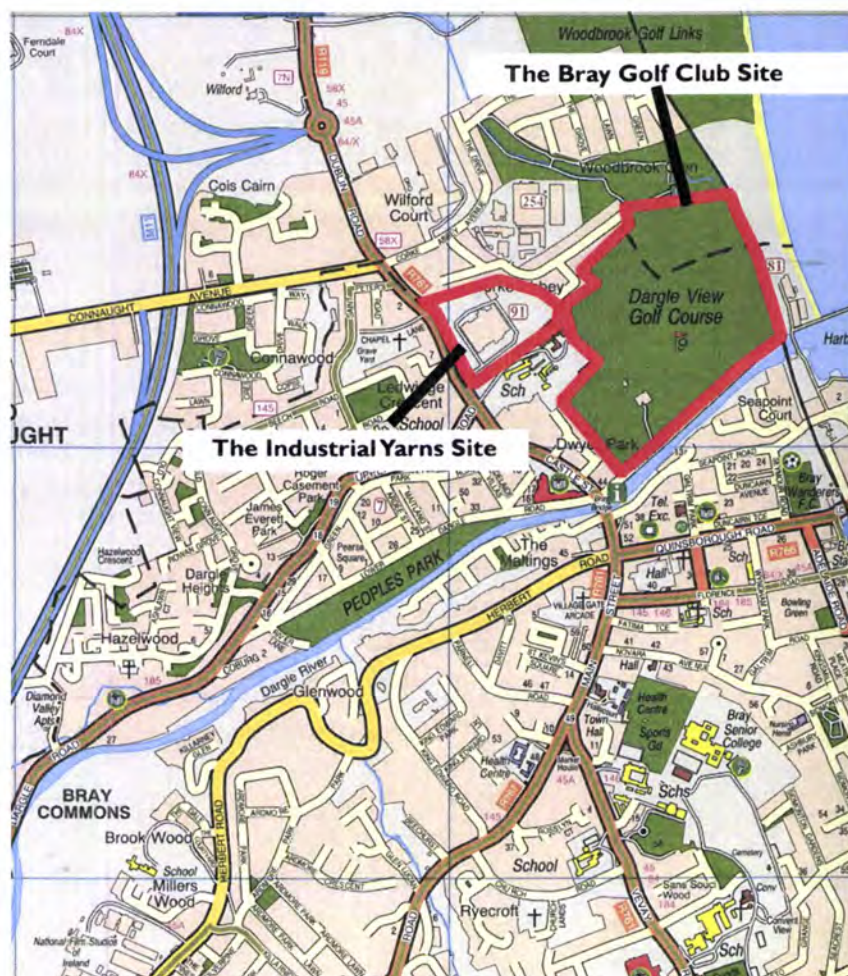
Our Ref: 17016

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

Dear Sir/Madam,

We are instructed by Pizarro Developments Ltd. in Receivership, c/o Mr. Ken Fennell as Receiver, owners of the Former Bray Golf Club Lands (and the Industrial Yarns Site in the administrative area of Dún Laoghaire - Rathdown County Council) to make this submission on the Draft Local Area Plan (LAP), published on the 2<sup>nd</sup> August 2017.

**Figure 1  
Site Location**





## 1.0 Introduction

The Golf Club lands are approximately 21 hectares in area (this excludes Industrial Yarns). Approximately 16.6 hectares (41 acres) are within the administrative area of the former Bray Town Council, now incorporated within the administrative area of Wicklow County Council. The balance of the land holding is to the North East of the site and is zoned for residential purposes in Dún Laoghaire - Rathdown County Council Development Plan 2016-2022. Despite being in separate administrative areas, the lands will be developed in a coherent fashion. The lands in Dún Laoghaire - Rathdown County Council are c. 4.48 hectares in area and have permission for c.348 residences extant until June 2020.

The subject lands in the Wicklow County Council administrative area also have the benefit of a 10-year permission for a mixed-use development comprising primarily retail and residential uses with other commercial and community facilities. The permission was granted on appeal on 3<sup>rd</sup> June 2010 after an oral hearing and a thorough examination of the issues affecting the development of the site.

The permitted scheme comprises 603 residential units, 58,000sqm of retail (gross), 5,800sqm of offices and c. 12,000sq. metres of ancillary uses (a cinema, bars, restaurants and community facilities). The principles of development upon which the permitted scheme was based have not changed. The proximity of the site to and its synergy with the existing town centre will be enhanced with the provision of new bridges (pedestrian and vehicular) over the River Dargle. Increased connectivity to the Dart Station and the Main Street is such that the site has the key ingredients necessary to secure the successful expansion of the town centre. This will achieve the principles of proper planning and the designation of Bray as a Metropolitan Consolidation Town in the Regional Planning Guidelines, and a Major Town Centre in the Retail Guidelines for the Greater Dublin Area.

Subsequent to the above, planning permission has been granted on the Golf Club lands for a 450 pupil post primary school and a 24-class primary school catering for approx. 1,170 pupils in total, each with playing and recreational facilities. The schools are under construction and nearing completion.

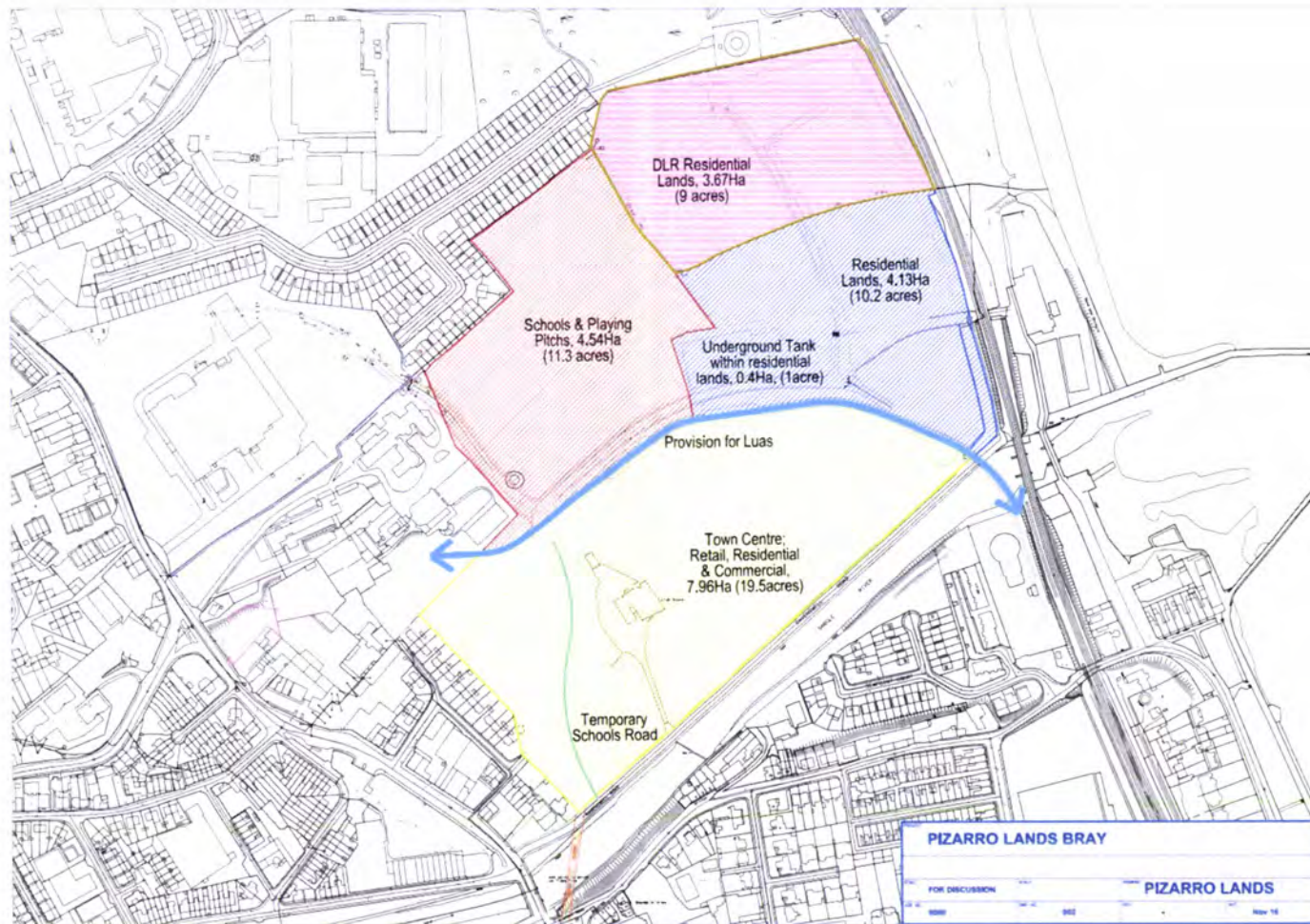
Of the 16 hectares of land identified in the draft plan, the schools/sports zone (including 2 school buildings) and access roads which are currently under construction, cover an area of 4.54 ha. In addition, a large local authority storm water attenuation tank has been installed that occupies 0.4 ha. Furthermore, additional land has been reserved for the future development of a central access road and LUAS provisions that are mooted to link to a new bridge over the River Dargle and connect to the DART Station. The lands will also accommodate a main trunk sewer proposed by Irish Water. This is an indication of the level of infrastructure that has been invested in and or identified as required for this site.

Given the above, it can be reasonably assumed that c.10 ha of land remains available for development of a mixed-use town centre development. This excludes the lands located in Dún Laoghaire-Rathdown.

The above areas are depicted on the map below, which includes the administrative area within Dún Laoghaire – Rathdown County Council.



**Figure 2**  
**Land – Use Zoning Map**





In general, Pizarro Developments Ltd. welcomes the proposals in the Draft LAP. It is noted that the plan makes reference to the extant permissions and the possibility that an extension of duration permission could be sought. In the event that these permissions wither, or are not commenced, the Draft Plan outlines requirements that any new development proposals shall comply with.

The Draft Plan is comprehensive and we have taken this opportunity to comment on specific requirements that might impact on potential development proposals for the subject site. These will be dealt with in more detail, below, when discussing Specific Local Objective 3: Former Bray Golf Course, contained in Chapter 10 of the LAP.

## 2.0 General Comments

The Draft LAP highlights the need for the town to become a major shopping destination for comparison goods and to attract people from surrounding towns and villages. The imperative for this is enhanced by the proposed town centre in Cherrywood with up to 35,000sqm of gross retail space to be developed in the SDZ. Despite being linked to and supporting the new population of Cherrywood, the town centre therein will attract retail expenditure from North Wicklow. It is essential that the new LAP supports and promotes a Bray Town Centre development that is viable and can be developed. The Golf Club development will also physically promote the viability and vitality of the existing town centre in a sequential manner. The importance of the Golf Club development for the town cannot be overstated. The development of the Golf Club lands will also help provide other strategic objectives of the Plan. It will cater for the future expansion of Luas, provide additional public transport crossings of the River Dargle and provide linkages to the Dart station, Seafront and Harbour.

## 3.0 Residential Development

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

## 4.0 Town Centre

Chapter 5 of the Draft Plan deals with the Town Centre. All of the existing and historic centre is zoned Town Centre (TC) – “to provide for the development and improvement of appropriate town centre uses”. The lands of the Former Golf Club are zoned Mixed Use (MU)– “to provide for mixed use development”. However, the chapter discusses the Former Golf Club Lands in several references when considering the future development of the Town Centre.

For example, Policy BT2 seeks to promote significant retail and commercial development in Bray Town Centre at the Florentine Centre and the Former Golf Club Lands. Yet in the preceding paragraph it is stated that Bray Town Centre consists of the land which is zoned TC. It is suggested that the language used in this section should be altered to provide greater clarity in this regard. A similar confusion persists with Policy BT3 which refers to building heights. A maximum of 3 storeys above ground is considered appropriate in the Town Centre, exceptions are possible. The permitted “town centre development” on the Former Golf Club lands is significantly taller than 3 storeys over ground. While the Former Golf Club Lands are part of the Town Centre they are zoned MU not TC. It is therefore assumed that the height restriction of 3 storeys over ground does not refer to the Former Golf Club Lands. It would be impossible to achieve the densities needed to develop 1,000 residential units with a three storey over ground height restriction in place.

It is suggested that policy BT3 in section 5.3 be amended to clearly state that the 3 storey over ground restriction does not apply to the former Golf Club lands.

## 5.0 Tourism and Recreation

Chapter 7 of the Draft Plan contains policies which refer to the Dargle River. The Golf Club lands enjoy significant frontage to the river. The permitted development proposes an enhanced river frontage with a promenade, steps from the level of the town centre down to the river, seating areas, public realm and outside spaces for cafes/restaurants. All of the above enjoys southern aspect and would prove a major addition to the amenities of the town for use by existing and future visitors and residents. However, Section 7.3 of the Plan seeks to “reserve lands along the river bank of not less than 10m free of all development”.

It is noted that the flood defence works to the River Dargle include the landscaping of Ravenswell Road.

It is assumed that it is not intended that the amenity potential described above would be prohibited. Development (albeit limited) is needed to provide the type of recreational and leisure experience envisaged in the development of the Golf Club lands. It will be necessary to marry this with the flood defence works. The 10 metre restriction in the Draft Plan refers to the entire river. It is suggested that this should be amended for the frontage of the Golf Club lands. Again, this requires clarification in a revision to the Draft Plan.

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

We refer to figure 4 of this submission. This is a suggested green infrastructure network for the lands. At its centre is a park of c. 1.3 hectares. This is augmented with a pocket-park, the village green, riverside promenade and linear park/jogging track beside the Dart line. These amenities total c.2.7 hectares. In addition, there will be a community park of c.1 hectare in Dun Laoghaire Rathdown, with active play facilities. (refer to figure 4 of this submission).

The provision of c.3.7 hectares of public amenity on a development site of 14.48 hectares represents a large area (25%) within an urban town centre mixed use development.

As a result, it is suggested that the requirement for a minimum 2 hectares park in SLO 3 be amended. The requirement should be for a park of a minimum of 1 hectare which is to be the centre of a green infrastructure for the lands.

## 6.0 Infrastructure

Chapter 8 of the Plan, in Policy RO5, specifically refers to the Golf Club lands. It states: “with respect to the major development area at the former Bray Golf Course, excellent linkages shall be provided from the site to surrounding areas, multiple access points for both vehicles and cyclists/pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray Seafront the Dart Station and public walking routes along the river”.

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

## 7.0 Former Golf Club Lands

Chapter 10 contains specific objectives and recommendations for several key sites in the Plan area. Specific Local objective (SLO 3) refers to the Former Golf Club Lands.

SLO 3 states that MU zoned lands are c. 17 hectares in area. It is a stated objective that the lands will be developed as a mixed commercial residential, education/community facilities and open space zone. The fact that c. 5 hectares have been developed to date as a school/sports zone is referenced. The 5 hectares figure would also include the area of the attenuation tank, located to the south east of the school site. As a result, c. 12 hectares of land are available for mixed-use development.

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

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

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



**Figure 3**  
**Bray Permitted Masterplan**



Figure 2.1 Masterplan

**Figure 4**  
**Proposed Green Infrastructure Plan**





## 8.0 Revised Masterplan

It is likely that a new masterplan will be prepared for the redevelopment of the lands. This will be used to inform the detail of any development that will be subject of new planning applications.

It is considered likely that the footprint of the “town centre/commercial” element of a new proposal will reduce. For example, a cinema is unlikely with provision of same in Florentine Centre. The new “retail experience” is now focused more on leisure with the increase in online retail sales. The quantum of retail floor space is likely to be below the previously permitted (58,000sqm) with an additional of 12,000 sqm of bars/restaurants etc.

It is noted that the Draft Plan requires a minimum of 20,000 sqm of retail floorspace, to include retail services, including restaurants. In addition, the existing permission provides for 3 levels of basement parking. Such an extent of basement construction is unlikely to be economically viable. Alternative provision, such as a multi-storey carpark, will have to be considered.

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

## 9.0 Phasing and Implementation

As above, a masterplan will be prepared for the redevelopment of the lands. This will include phases for building commercial and retail floor space, residential and car parking provision. The Draft Plan proposal that a Phase I of development could include the free-standing apartment blocks and public park is welcomed. Supporting social infrastructure (crèches etc.) would also be developed. This proposal is supported and will allow for a phased and economically viable development model to be promoted.

## 10.0 Summary

The policies and objectives of the Draft Plan that refer to the Former Golf Club Lands are broadly welcomed. Some apparent discrepancies have been highlighted in this submission (building heights, town centre designation to include Golf Club despite MU zoning etc.). It is considered that the discrepancies can be readily amended to provide the clarity needed for new proposals to be advanced for the redevelopment of the lands. The most important and significant part of the Draft LAP that is considered to require amendment refers to the minimum provision of 1,000 residential units on the lands.

This could require buildings of 8-10 stories in height. The apartments will also require several levels of basement parking. Based upon the experiences of the previous planning applications for the lands, significant additions to previously permitted building heights require detailed consideration. This part of the Plan and the SLO, along with the minimum size of the public park should be amended.

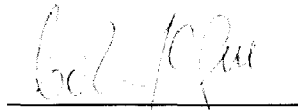
## 11.0 Conclusion

Subject to the above suggestions it is considered that the Draft Plan and the SLO provide a viable basis for the redevelopment of the Former Golf Club Lands. Such redevelopment is likely to see the reconsideration of the previously permitted scheme. Key elements of infrastructure (social and physical) will remain along with the provision of linkages to the existing town, seafront/harbour and Dart station. The Former Golf Club Lands are uniquely positioned to assist in the provision of quality public transport linkages which will serve the wider area. It will help achieve the Council's objectives for transportation and traffic in the Bray and Environs area. The River Dargle provides the potential for a high-quality amenity which along with the public park will contribute to an environment that will accommodate thousands of new residents, visitors and shoppers alike. This will help Bray fulfil its role as a Consolidated Town in the Greater Dublin Area.

It is considered important that careful consideration is given to the use of prescriptive minimum targets – a 2 hectares park and 1,000 residential units. The lands may not have the capacity to provide these in tandem.

It is suggested that these issues will evolve through design development in the preparation of a new planning application. The Plan and SLO 3 should not be prescriptive but rather promote a viable and sustainable mixed-use town centre development through more general policies and objectives.

Yours faithfully,



Colin McGill,  
**McGill Planning Limited.**  
**Chartered Town Planners.**

**15<sup>th</sup> September 2017**

C245

**Leonora Earls**

---

**From:** John Powderly [r]  
**Sent:** 12 September 2017 20:20  
**To:** Planning - Plan Review  
**Subject:** Fwd: Proposed development at the little sugarloaf

----- Forwarded message -----

**From:** "John Powderly" <[john.powderly@wicklow.co.co.ie](mailto:john.powderly@wicklow.co.co.ie)>  
**Date:** 12 Sep 2017 20:01  
**Subject:** Proposed development at the little sugarloaf  
**To:** <[planreview@wicklow.co.co.ie](mailto:planreview@wicklow.co.co.ie)>  
**Cc:**

Dear sirs

I would like to submit my objection to the proposed development at the little sugarloaf, not only is it an area of natural outstanding beauty but we in Hollybrook park also suffer from flooding which will worsen with this development

. also strongly object to the walk/ cycle way that's proposed through our estate which would obviously mean the cutting down of the trees that have stood for generations

Yours faithfully  
John and Elaine Powderly

5 DWYER PARK

BRAY

CO. WICKLOW

A98 D9C6

4TH SEPT 2017



C246

TO WHOM IT MAY CONCERN,

AS RESIDENTS OF NUMBER 5 DWYER PARK, WE WOULD LIKE TO MAKE A SUBMISSION REGARDING BRAY DRAFT DEVELOPMENT PLAN.

THE SAID SUBMISSION WOULD BE TO RE-ZONE THE REMAINING BRAY GOLF CLUB LANDS AS PARK LAND FOR RECREATIONAL USE AND NOT ALLOW BUILDING ON THE FLOOD PLANE, WE BELIEVE THIS WOULD FURTHER ENHANCE THE STERLING WORK ALREADY IN PLACE FOR THE RESIDENCE OF BRAY AND LITTLE BRAY WHO HAVE SUFFERED SO MUCH DAMAGE TO THEIR PROPERTY OVER THE YEARS FROM FLOODING.

THE WALKWAY AND BOARDWALK ALONG THE RIVER LOOKS AMAZING AND IF IT COULD BE EXTENDED TO THE SEAFRONT WOULD BE A GREAT ASSET TO THE TOWN FOR RESIDENCE AND VISITORS A LIKE.

KIND REGARDS.

*Avril Power*

AVRIL POWER



C247

Pamela Prendergast  
The Banks  
Kilmurray  
Quill Road  
Kilmacanogue  
Co. Wicklow



7<sup>th</sup> September 2017

The Administrative Officer  
Planning Department  
Wicklow County Council  
Whitegates  
Wicklow Town  
Co. Wicklow

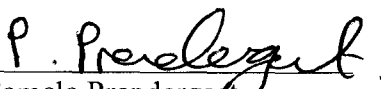
**Re: Submission to the Bray Municipal District Local Area Plan (2017-2023)**

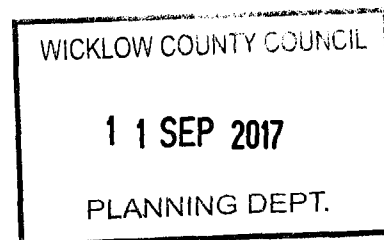
A Chara,

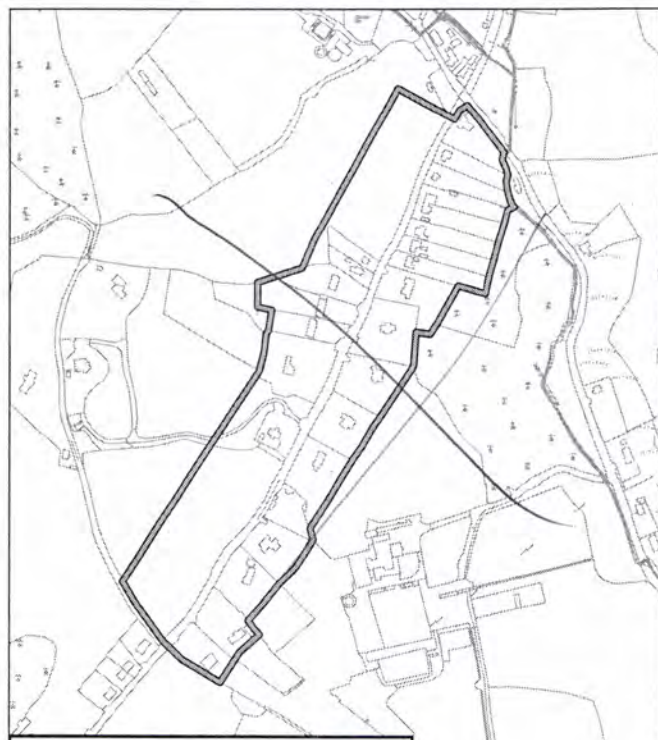
As part of the Statutory Public Consultation period I wish to make the following submission:

Please find attached a map of Kilmurray (Kilmacanogue) settlement boundary rural cluster. Can you please include the area bounded in red and marked a, b, c & d in the 2017 to 2023 Bray Municipal Local Area plan.

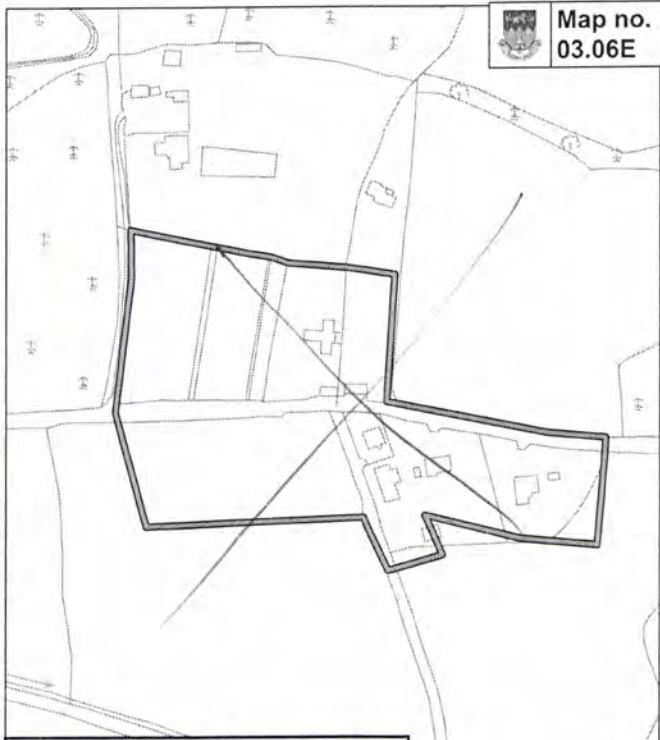
Yours sincerely,

  
Pamela Prendergast

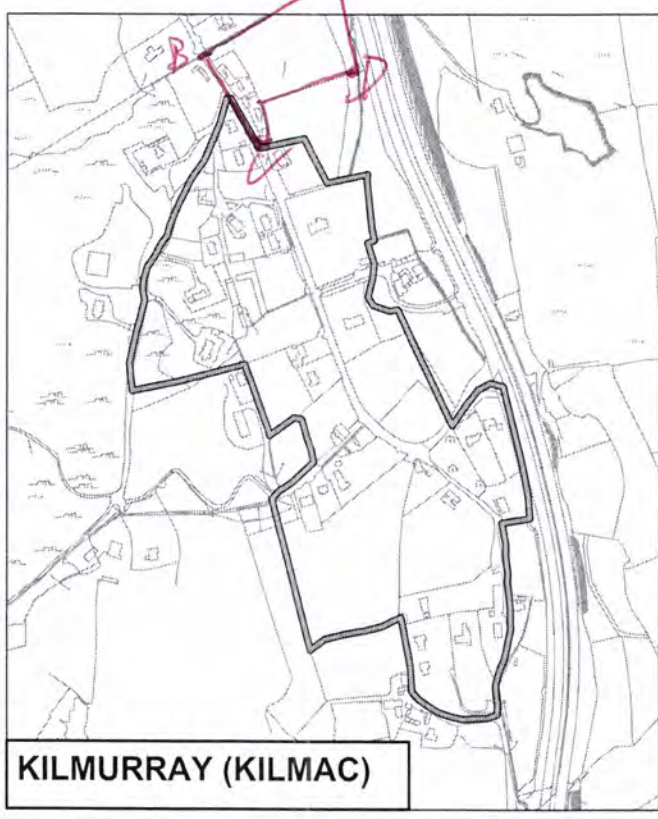




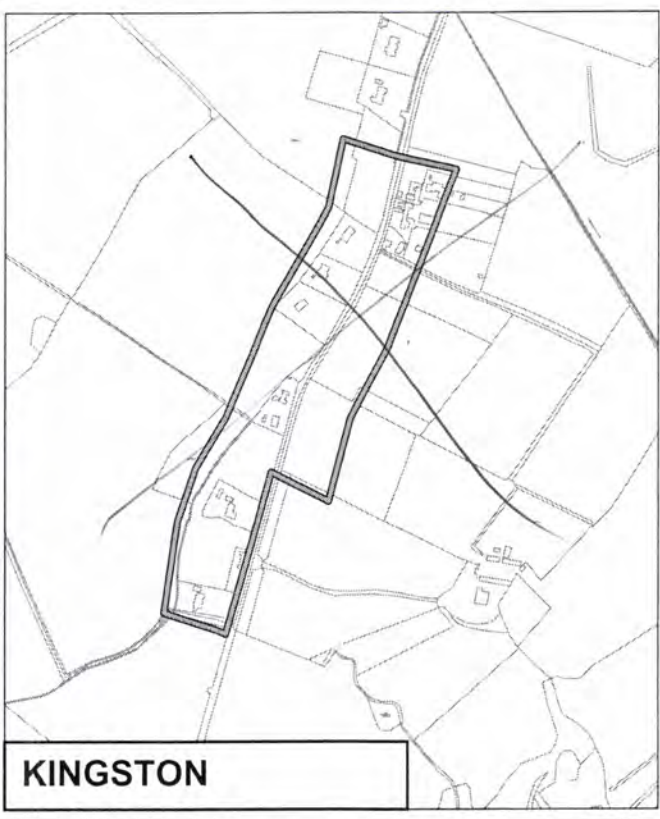
**KILLISKEY**



**KILMURRAY (NTMK)**



**KILMURRAY (KILMAC)**



**KINGSTON**

**Settlement Boundaries  
Rural Clusters**

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Maps Not To Scale

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2015/35/CCMA/Wicklow County Council

C248

Paul Prendergast  
Kilmurray  
Quill Road  
Kilmacanogue  
Co. Wicklow

7<sup>th</sup> September 2017

The Administrative Officer  
Planning Department  
Wicklow County Council  
Whitegates  
Wicklow Town  
Co. Wicklow

**Re: Submission to the Bray Municipal District Local Area Plan (2017-2023)**

A Chara,

As part of the Statutory Public Consultation period I wish to make the following submission:

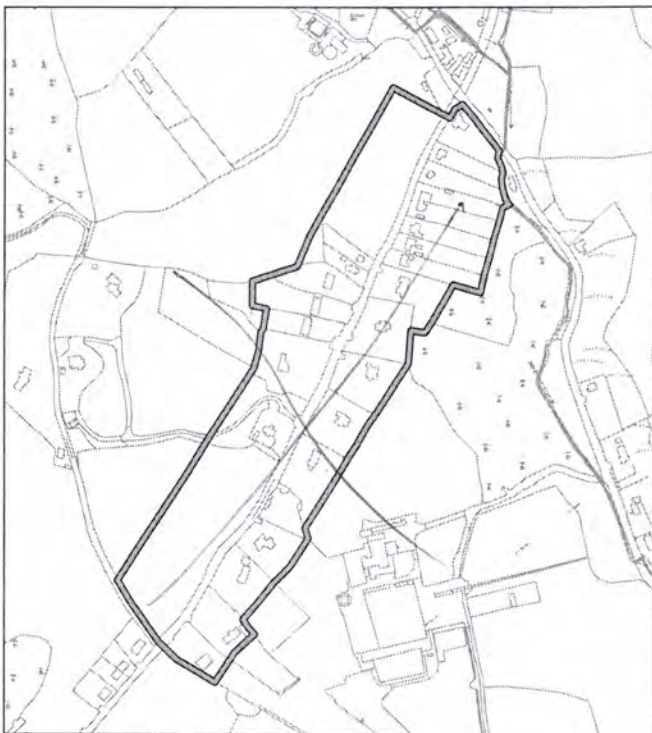
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Yours sincerely,

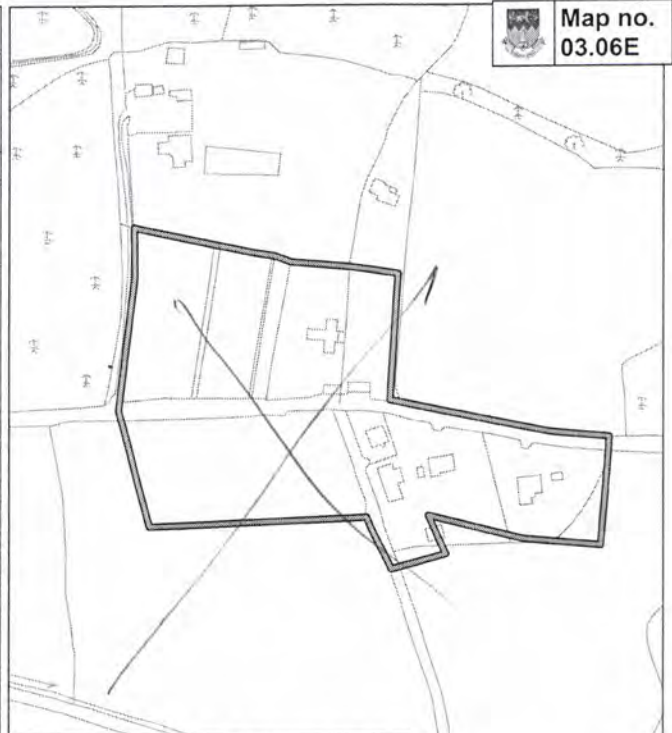


Paul Prendergast

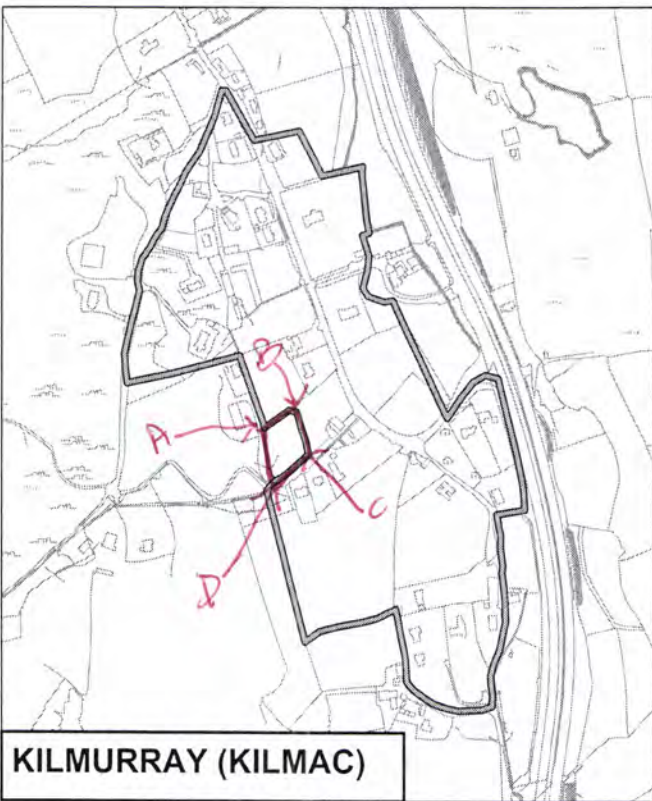




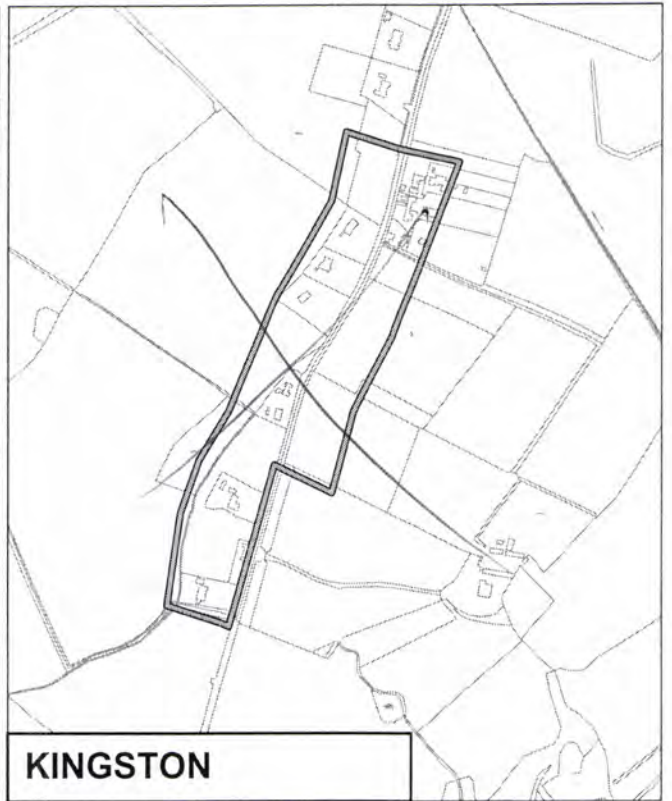
**KILLISKEY**



**KILMURRAY (NTMK)**



**KILMURRAY (KILMAC)**



**KINGSTON**

**Settlement Boundaries  
Rural Clusters**

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Maps Not To Scale

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**Leonora Earls**

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**From:** Grace Purtil [  
**Sent:** 15 September 2017 15:04  
**To:** Planning - Plan Review  
**Subject:** LAP

To whom it may concern

I wish to lodge an objection to the proposed rezoning of lands on the Kilruddery estate.  
In particular (1) the zoning that would allow for commercial and residential development.  
(2) to insist that the green belt zoning is to be re-instated on the fields above and to the east of Deepdales.

Kind regards

Grace Purtil

**Leonora Earls**

---

**From:** Keith Pyper [mailto:keith.pyper@hpra.ie]  
**Sent:** 01 September 2017 13:57  
**To:** Planning - Plan Review  
**Cc:** keith Pyper  
**Subject:** Lodge Objection for the proposed Re-Zoning of a plot of land in grounds of Oldcourt House

Hi,

**To Wicklow County Council:**

I am a home owner and occupier of 48 Giltspur Brook, Bray with my wife and 2 teenage son's, and have lived at this address for 17 years.

I am objecting to the proposed re-zoning of a plot of land in the grounds of Oldcourt House, on the basis of access to this site will have a significant negative impact to safety of the residents of Giltspur Brook.

My main concerns are;

- 1) The current road is not suitable to accommodate increased traffic.
  - a. Road is too narrow, already congested with parked cars belonging to existing residents.
  - b. Residents park cars on bends/junctions some of which are blind turns, extremely dangerous
  - c. The junction from Wheatfield into Giltspur Brook, is regally congested with parked cars, when entering or exiting the estate you MUST drive on the wrong side of the road through the junction, which is also a blind turn.
  - d. Increase in traffic through a residential area.
- 2) Development may open a second entrance to Giltspur Brook, it would become a rat run for non – residents to avoid main roads.
- 3) Development and proposed opening of foot path into rezoned area would make our estate prone to getting unsavory characters using it as a short cut. So potential increase in crime

I trust my objections will be listened to;

Regards,  
Keith.

**Keith Pyper**  
**ICT Manager**

Health Products Regulatory Authority | An tUdaras Rielala Tairgi Slainte  
Kevin O'Malley House, Earlsfort Centre, Earlsfort Terrace, Dublin 2.

Tel: -

Fax: +3

Mob: -

kei

[www.hpra.ie](http://www.hpra.ie)

**Leonora Earls**

---

**From:** Hugh Quigley |  
**Sent:** 15 September 2017 09:05  
**To:** Planning - Plan Review  
**Subject:** Fwd: Proposed Changes to Roads in Kilmacanogue

**Categories:** Red Category

----- Forwarded message -----

**From:** **Hugh Quigley** <[hquigley@wicklowcoco.ie](mailto:hquigley@wicklowcoco.ie)>  
**Date:** 15 September 2017 at 08:26  
**Subject:** Proposed Changes to Roads in Kilmacanogue  
**To:** [planreview@wicklowvovo.ie](mailto:planreview@wicklowvovo.ie)  
**Cc:** [crfox@wicklowcoco.ie](mailto:crfox@wicklowcoco.ie), [stevensgreenbray@gmail.com](mailto:stevensgreenbray@gmail.com), [olobriain@gmail.com](mailto:olobriain@gmail.com),  
[pavance@wicklowcoco.ie](mailto:pavance@wicklowcoco.ie), [jcbthornhill@gmail.com](mailto:jcbthornhill@gmail.com), [cllrnicoelocconnor@gmail.com](mailto:cllrnicoelocconnor@gmail.com), [joebehan@outlook.ie](mailto:joebehan@outlook.ie),  
[jryan@greatplacetowork.ie](mailto:jryan@greatplacetowork.ie), [tom.fortune49@gmail.com](mailto:tom.fortune49@gmail.com), [Nicola.lawless.sf@gmail.com](mailto:Nicola.lawless.sf@gmail.com),  
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[GEONEill@wicklowcoco.ie](mailto:GEONEill@wicklowcoco.ie), [TCullen@wicklowcoco.ie](mailto:TCullen@wicklowcoco.ie), [vblake@wicklowcoco.ie](mailto:vblake@wicklowcoco.ie),  
[murphyinmotion@gmail.com](mailto:murphyinmotion@gmail.com), [marymcdonaldsinnfein@gmail.com](mailto:marymcdonaldsinnfein@gmail.com), [patkennedy1@outlook.com](mailto:patkennedy1@outlook.com),  
[PFitzgerald@wicklowcoco.ie](mailto:PFitzgerald@wicklowcoco.ie), [SBourke@wicklowcoco.ie](mailto:SBourke@wicklowcoco.ie), [tomannesley@yahoo.co.uk](mailto:tomannesley@yahoo.co.uk)

### To Whom It May Concern

I understand that there is a proposal to plan and develop a new roadway to the east of the N11 along the slope of the Little Sugar Loaf. It has been suggested that this road might serve as an alternative route for motorists from the south or west seeking to access Bray would then be able to use this road as an alternative to the N11.

Having lived in this area for more than 20 years I would wish to strenuously object to such a proposal on the following grounds:

1. The slopes of the Little Sugar Loaf are currently home to a diverse range of wildlife and such a development would likely to be hugely disruptive to this semi-wild environment.
2. A full traffic study should be conducted to support the suggestion that there is a need for such a new roadway.
3. This proposal would seem to contradict the previous trend towards protective both the Great Sugar Loaf and Little Sugar Loaf mountains from over-development.

The existing road arrangements through the village are substandard and unsafe and I wish to make the following observations:

### Southbound from the end of the M11:

- Existing arrangements for pedestrians and cyclists, travelling from the Fassaroe junction (including the Fassaroe Bridge) are poor, with little or no separation from vehicular traffic to Kilmacanogue.

- The arrangements for traffic wishing to access any of the business premises in Kilmacanogue (to the east of the N11) are poor, particularly for Heavy Goods Vehicles entering Glen Fuels.
- Traffic exiting the Glen Fuel or Topaz Service Station should not be permitted to merge immediately onto the N11 but directed up the off-ramp at Junction 8 and then safely rejoin the N11 from the on-ramp.

Northbound from Glen of the Downs:

- Traffic wishing to exit the N11 at Junction 8 tend to approach the "button" roundabout at the exit at excessively high speed (already on one occasion a vehicle has failed to stop and crashed into the wall of Pluck's car park). Speed restrictions on the approach to this exit are required.
- There is insufficient observation of the painted double yellow lines opposite the service station with many vehicles, particularly light and heavy commercial vehicles, parking there for a few minutes while making purchases in the Service Station. Oftentimes the roadway outside the Service Station becomes completely blocked, especially if the service station is busy and vehicles are queuing to access the fuel pumps.
- Consideration should be given to relocating the public bus stop as currently, all buses travelling from the south can only halt at the bus stop via the "button" roundabout and along the narrow roadway outside the service station.
- Consideration should be given to removing the painted ghost island that forces traffic wishing to access Avoca Handweavers to merge into the inner carriageway of the N11 and then exit again almost immediately.
- There is no separation for pedestrians or cyclists from vehicular traffic from just past Avoca Handweavers all the way along to the Fassaroe exit,

Yours faithfully

**Hugh Quigley**  
Kilfenora Road  
Kilmacanogue  
Co Wicklow

--

**Hugh Quigley**

**Leonora Earls**

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**From:** nicky ralph [i]  
**Sent:** 10 September 2017 11:17  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP

To whom it may concern,

My husband and I attended your public information evening at Bray Municipal office on Wednesday the 16th August 2017 in relation to the Draft Bray Municipal District Local Area Plan 2017-2023.

Our names are Alan and Nicola Ralph and we live at: 2 Killarney Glen,  
Herbert Rd,  
Bray  
Co. Wicklow.

On behalf of our family we would like to strongly object to the proposed walkway on the River Dargle south bank. This bank is approximately 15 metres from our home at the end of our garden. If this proposed walkway occurred, our main living area is orientated in this direction and whilst our concerns revolve around many aspects, our primary concern is our family's privacy and safety.

For quite a number of years we initially dealt with Bray County Council and more recently Wicklow County Council with regard to the River Dargle flood protection. Knowing and seeing the reasons for human safety and protection that these improvements were implemented for, we struggle to see how and where this "pedestrian circulation" pathway can be accommodated on the south bank within your plans for 2017-2023.

We would be concerned regarding the safety of the various embankments in this area (including the bank upon which Herbert Road is built) to withstand the necessary works as the majority of them have a high sand content. We are aware of a case ongoing nearby with regard to a landslide into a property in The Maltings development.

During the river works the Dargle river has changed dramatically. We, as a family, have lived throughout the disruption that the works brought but continue to live with exceptionally anti social behaviour not only on our side of the river but also from the opposite side. The river works removed all natural protection on both banks and undesirable gatherings of youths occur. These occur even with the use of 24hr security cameras and full monitoring. We have had to place numerous documented Garda call outs for such behaviour as stone throwing, abusive language, threatening behaviour, shed break ins, shooting of pellet guns to name but a few - all which have occurred directly behind our home, 15 metres from our family living area. I would strongly request that you review the information gathered by the Gardaí and the security firm that is monitoring the river at present as they will confirm this anti social behaviour. Due to a series of unpleasant threatening behaviours from youths during not only night time but also during day time, we had a meeting at our home with Bray Community Garda, Darren Kelly. It is common knowledge that walkways in secluded areas such as this are a magnet for anti-social behaviour.

We would struggle to understand,

- Where this "pedestrian circulation" pathway can be safely placed due to the geology on the south bank,
- How the physical landscape issues can be overcome in order to connect the pathway from the Rehills Land Area along the south bank of the Dargle to Bray Town
- How you would intend to maintain public safety to those on the "intended" pathway during weather storms as the Dargle is an extremely fast flowing river at times

- How you would maintain public safety to those on the "intended" pathway from the anti-social behaviour that tend to thrive in such areas
- And finally our own most serious personal issue - how we and other home owners along the south Dargle bank can be guaranteed the safety and privacy of our families, without destroying the amenity and value of our homes.

We would implore the members of the planning authorities to consider the rights and views of all the residents that live with family homes in this situation and who are already living with serious anti social behaviour, that affects our quality of family life,

Yours Sincerely,

Nicola and Alan Ralph

**Leonora Earls**

---

**From:** Hazel Redmond [I]  
**Sent:** 12 September 2017 21:18  
**To:** Planning - Plan Review  
**Subject:** Rezoning of lands in Killruddery Demesne

Hazel Redmond  
38 Swanbrook  
Bray  
Co Wicklow

To: Wicklow County Council

I wish to object to the rezoning for Housing and Industry in Killruddery Desmesne. It will be an environmental disaster for the wildlife. The introduction and establishment of the Red Kite has just about settled in well, I've noticed two pair recently with their young. Also Pine Martins and Sparrow Harks have made their homes there, not to mention Badgers, Squirrels and all the lovely Beings that exist only because of the green belt. We must also be mindful of the Flora of which our pollinators exist, without them we will cease to exist. We must be mindful of our duty as a humane society to protect the ones who don't have a voice. We can't keep pushing the boundaries of the voiceless, taking away their habitat and expect no consequences. It's time we took responsibility and are held accountable for our destructible behaviour.

Yours faithfully

Hazel Redmond

**Leonora Earls**

---

**From:** Anthony Marston [mailto:am@marstonplanning.ie]  
**Sent:** 15 September 2017 14:54  
**To:** Planning - Plan Review  
**Subject:** DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023  
**Attachments:** Flood Risk study.pdf; Submission report.pdf

TO WHOM IT MAY CONCERN

Please find attached submission in relation to the Draft Bray Municipal District Local Area Plan 2017-2023. A Flood risk assessment report in relation to some of the lands subject to this submission is also attached.

I would be grateful if you would confirm receipt.

Regards

Anthony Marston  
**Marston Planning Consultancy**

m:01  
[www.marstonplanning.ie](http://www.marstonplanning.ie)

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# MARSTON

## PLANNING CONSULTANCY

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

14<sup>th</sup> September 2017

Our Ref. 16017

**Re: Formal submission in relation to the Draft Bray Municipal District Local Area Plan 2017-2023**

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by our clients Rego Property, in relation to lands that measure some 6.1 hectares that include one habitable dwelling at Oldcourt House, to make this formal submission to Wicklow County Council in relation to the Draft Bray Municipal District Local Area Plan 2017-2023.

Following an extensive submission made by ourselves in relation to these lands in response to the Issues Paper relating to the preparation of the LAP in November 2016 the Planning Authority have published the Draft Bray Municipal District Local Area Plan 2017-2023. We welcome the inclusion by the Planning Authority of some lands within the Oldcourt House property as being zoned for residential purposes.

We refer the Council to the fact that a review of the deeds to the property have confirmed that the overall landholding was misrepresented in this earlier submission at the northern end of the landholding. This has not affected any land that was rezoned as part of the publication of the Draft LAP. It is not the purpose under this submission to reiterate the basis of this original submission but to deal with the zoning of the lands as identified below. The rezoning of part of these lands under the Draft LAP can be broken into three distinct areas as shown on the map below:



Map 1 Excerpt from Draft Bray Municipal District LAP indicating Oldcourt House lands outlined in red and land to which rezoning is proposed under the Draft LAP outlined in purple



The three zoning changes to our clients' lands under the Draft LAP are:

**1. Oldcourt House and its environs that includes the land either side of driveway** – the majority of these lands have been rezoned as RE – Existing Residential. The rezoning of these lands is viewed as being appropriate and acceptable to our clients and in accordance with best planning practice. Therefore no material change to this zoning is proposed under this submission.

We respectfully submit that this additional land forms part of the natural curtilage and setting of Oldcourt House, which is a protected structure. The area to the rear (south) of Oldcourt House is a paddock of flat grassland with former stables located at their northern end. An area to the immediate west of the house forms a former orchard and walled garden of the house. We submit that the attached flood risk assessment has shown that these lands are, when the flood risk of the River Swan is considered, not prone to, or have a history of flooding.

As outlined under the attached flood risk assessment of the specific lands to the immediate west and south of Oldcourt House undertaken by Barret Mahony, Consulting Engineers there is little if any evidence of the potential for flooding on the adjacent Open Space lands, and given the applicants control of the downstream lands they have complete control of the ability to implement mitigation measures, and intend as a matter of course to remove the double concrete culvert that clearly forms a potential blockage to the flow of the river to the immediate north of the paddock that could create a potential flood. The inspection of the site by the Consulting Engineers indicated no potential flood risk to these lands. We refer the Planning Authority to the attached report that comprehensively addresses this matter.

The fact that the head of the river is approximately 750m from the site and it runs mainly through areas of residential housing estates significantly reduces the catchment area. Downstream of the site, the river bed steepness increases significantly and the flow is unobstructed due to large trees blocking out the light and preventing overgrowth on the banks. This serves to provide a potential for conveying large amounts of water away from the site in the case of higher flows in the river. The implication of this is that the flood risk of the paddock and walled garden is significantly reduced. In addition the owner and lifetime resident of Oldcourt House has confirmed that the property and lands have never flooded due to the Swan River breaking its banks in this location. The proposed removal of the double culvert, which is the only constriction of the channel, will further reduce potential flooding of the site. It is possible that a range of flood mitigation measures could be incorporated into any development of this site that may include minimum finished floor levels, or a low flood defence wall or embankment running along the western side of the site.

- **Proposed rezoning of outlined lands from Open space to RE – Existing Residential**



Map 2 Excerpt from Draft Bray Municipal District LAP indicating extension to Area 1 RE – Existing Residential zoning (outlined in purple)

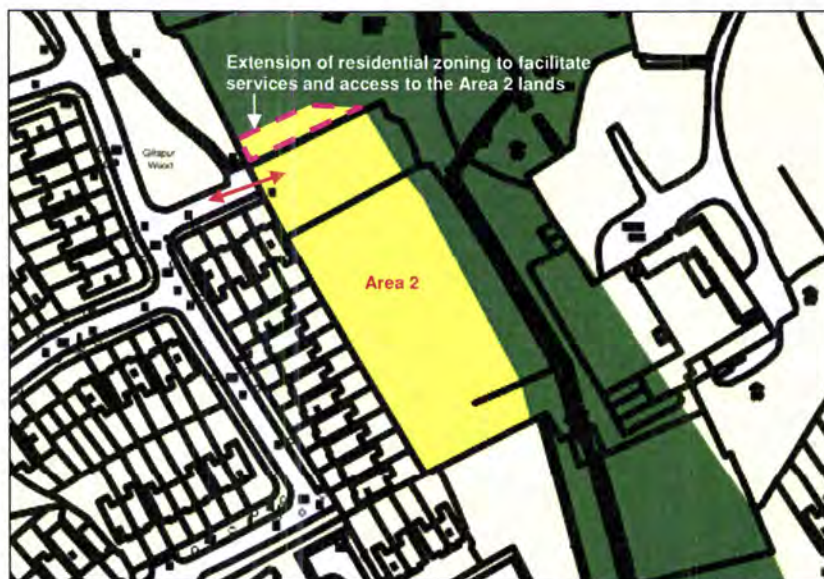
**2. Lands bounding Giltspur Wood to the west of Oldcourt House** – these lands have been rezoned as R20 – New Residential under the Draft LAP. The residential density of the zoning – 20 units per hectare -



reflects the very low density of the adjacent Giltspur Wood estate. The residential zoning of these lands is viewed as being appropriate and acceptable but the objective for such lands should be revised so that a minimum density of 20 units per hectare be achieved and that all development proposals on such land should be assessed on their own merits having regard to their impact on adjoining residential amenity / pattern of development.

We refer the Planning Authority that a legal right of access is available to these lands from the Giltspur Wood estate at the north-west corner of the lands. In order to avoid any potential issues in terms of gaining access, and requirements to provide infrastructure and services on non- residential zoned lands it is sought that a small portion of land to the north of this pocket of land is also zoned for residential purposes. This is set-back from the north-east to reflect the setting of Oldcourt Castle.

- **Proposed rezoning of outlined lands from Open space to New Residential, and amend overall R20 zoning to a minimum density of 20 units per hectare**



Map 3 Excerpt from Draft Bray Municipal District LAP indicating extension to Area 2 residential zoning (outlined in purple) to facilitate services and access to these lands

**3. Lands to the north east abounding Charnwood** – some 1.1 hectares of these lands have been rezoned as R20 – New Residential under the Draft LAP. Whilst our clients welcome this rezoning we would submit that the restriction on residential density and area is overly restrictive in this instance given the context. We submit that the extent of the new zoning, irrespective of the density applicable to it, should be extended to an area of 1.9ha as per the map below.

We would request that the Planning Authority positively consider the planning gains of indicating the overall landholding as being required to be subject to a master plan. This would provide the Council with control over densities but enable the overall lands to be developed in a manner that would provide significant planning gains to the existing and new residential areas.

Whilst part of the extended zoning includes the edge of the wooded area to the west it is clear that what would remain would be a significant portion of open space lands that would be wooded and could be managed in a sustainable manner. The loss of a small number of the trees (a number of which are in need of removal due to age and poor condition) would be more than compensated for by the opening up of the entire site to and from surrounding areas that would achieve a truly sustainable development of the Oldcourt lands.

We submit that the density of residential development within this area should be determined by the densities of adjoining residential development and the large extent of amenity / open space lands to its west. In this regard we note that the Charnwood estate to the east is developed at a density of some 28 – 30 units per hectare in the form of semi-detached houses. This is significantly above that identified for this area of the



site under the Draft LAP. It is our contention that to develop the site at a density of a maximum of 20 units per hectare would be wholly contrary to the proper planning and sustainable development of the area.



Map 4 Excerpt from Draft Bray Municipal District LAP indicating extension to Area 3 zoning and change in zoning to High Residential Densities

We request that the zoning for these lands, whether as outlined in the Draft LAP, or as outlined in this submission be amended to being R – HD (Residential High Density) with a density of not less than 50 units per hectare. The site has more than capacity, given its size and setting to accommodate such a density without compromising the quality of the open space along the Swan River or the residential amenity of the dwellings in Charnwood. The rezoning of these lands for high density in accordance with a master plan for the entire land holding would ensure a significant planning gain for the area. This would increase the capacity of these lands to some 90 units.

The lands are a walking distance of only 1,000m to the south-west of the town centre. The alteration and extension of this zoning will fully conform to National, Regional and County wide planning policy that all seek that development should be condensed and built up around core centres to facilitate densification and sustaining local facilities and services. Our clients' lands, and particularly these lands provide an ideal opportunity to achieve significant planning gains to the wider local community as well as achieving the strategic aims of the Council.

The premise of any rezoning to higher density residential development must be that any residential zoning of the lands should ensure that the amenity offered by the main woodland / amenity area is achieved. The best way forward in relation to this is via developing a master/action plan for the lands. This would tie the residential development component with the creation of the opening up of the amenity space that would be in lieu of any public open space requirement of the residential development.

What is clear in relation to the subject lands is that if the current zoning remains at such a low density it has little public benefit as the lands will remain in private ownership and have no public access to them. It is also clear that the protected structures will continue to decline without investment as will the woodland demesne without management. The proposed rezoning to higher residential densities addresses all of these.

The Oldcourt lands offer an opportunity to achieve a number of significant planning gains that can be of benefit to the County, town and immediate local population. However, this can only be achieved by creating new residential development at higher densities on this area of the site. Its capacity is undoubtable and by extending the zoning and residential density it offers the most sustainable approach to development. It will also increase permeability to surrounding residential areas, as well as a significant benefit in terms of the amenity space that is accessible to all local residents.

- **Extension of R20 zoned lands to create larger site and alteration of its zoning to Residential – High Density (R-HD)**

## **Conclusions**

We have set out under this submission some amendments to the zoning, density and extent of lands within the Oldcourt estate that are appropriate to incorporate within the finalised LAP. It is in the interests of the sustainable development of Bray to provide sustainable residential densities of 50 units per hectare on lands particularly greater than 0.5 hectares such as Area 3. Such lands have the capacity to establish their own character and form without impacting upon the residential and visual amenities of surrounding lands. This is even more so in the case of the extended Area 3 within Oldcourt.

Our clients' lands clearly provide a strategic opportunity to achieve significant planning gains to the wider local community as well as achieving the stated aims of the Council. The premise of any rezoning must be that any residential zoning of the lands should ensure that the amenity offered by the main woodland / amenity area is achieved, but also facilitates new residential development whilst enabling the setting of the protected structures to be retained.

This can be achieved by a direct rezoning as proposed in the Draft LAP (albeit as amended under this submission) or by identification of the Oldcourt lands to be subject to an Action Area Plan / Master Plan that would provide a planning framework in which the development of the Oldcourt lands may be facilitated, and appropriate proposals developed.

The subject site which is located on the edge of the existing town core is well serviced and is in all respects suitable for residential development, some of which on sites greater than 0.5 hectares should be at higher densities. Its development for residential purposes and high densities where appropriate would be in accordance with the proper planning and development of the area including the preservation and improvement of the amenities thereof.

It is respectfully submitted that this submission is based on ensuring both the proper planning and sustainable development of Bray and the overall land parcel of our client's lands. It is also submitted that the need for housing in this location is fully in accordance with strategic policies set down by Wicklow County Council in the County Development Plan as well as national policy set down by the Residential Density Guidelines, National Spatial Strategy and the Regional Planning Guidelines.

We would be obliged if you will acknowledge receipt of this submission in due course and we would be happy to furnish any further information that you may require to deal with this matter.

Yours faithfully,



**Anthony Marston**  
**Marston Planning Consultancy**

<p><b>Barrett Mahony Consulting Engineers</b>  Civil . Structural . Project Management  Sandwith House, 52 – 54 Lower Sandwith Street, Dublin 2, Ireland.  Tel: (01) 677 3200 Fax: (01) 677 3164 Email: bmce@bmce.ie Web: www.bmce.ie</p>	<b>DOCUMENT</b>  <b>LEAD</b>  <b>SHEET</b>	<b>PAGE</b> <b>1</b> <b>OF</b> <b>13</b>
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**PROJECT:                    OLDCOURT HOUSE, BRAY**

**PROJECT NO.                17.274**

**DOCUMENT TITLE:        FLOOD RISK RE-ZONING SUBMISSION**

**DOCUMENT NO:            17.274 – RP – 01**

Issue	Date	Description	Orig.	PE	PD	Issue Check
0	11/09/2017	Issued for Discussion	PS	PS	CK	

**FLOOD RISK RE-ZONING SUBMISSION**

barrett mahony

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- 1.2 Setting
- 1.3 Information Used
- 1.4 Qualifications

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- 4.1 River Morphology and Catchment
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- 4.5 Conclusion

## **APPENDIX A – SURVEY PHOTOGRAPHS**



## 1. INTRODUCTION

### 1.1 GENERAL

Barrett Mahony Consulting Engineers Ltd. (BMCE) have been requested by Marston Planning Consultancy to undertake a review of a property at Oldcourt, Bray, Co. Wicklow with a view to assessing the appropriateness of the current zoning of part of the site as an area at risk of flooding.

### 1.2 SETTING

The Swan River runs through the Oldcourt House grounds, from south to north as shown in Figure 1 below. The site is the highlighted area to the east of the river which has been deemed at risk of flooding.

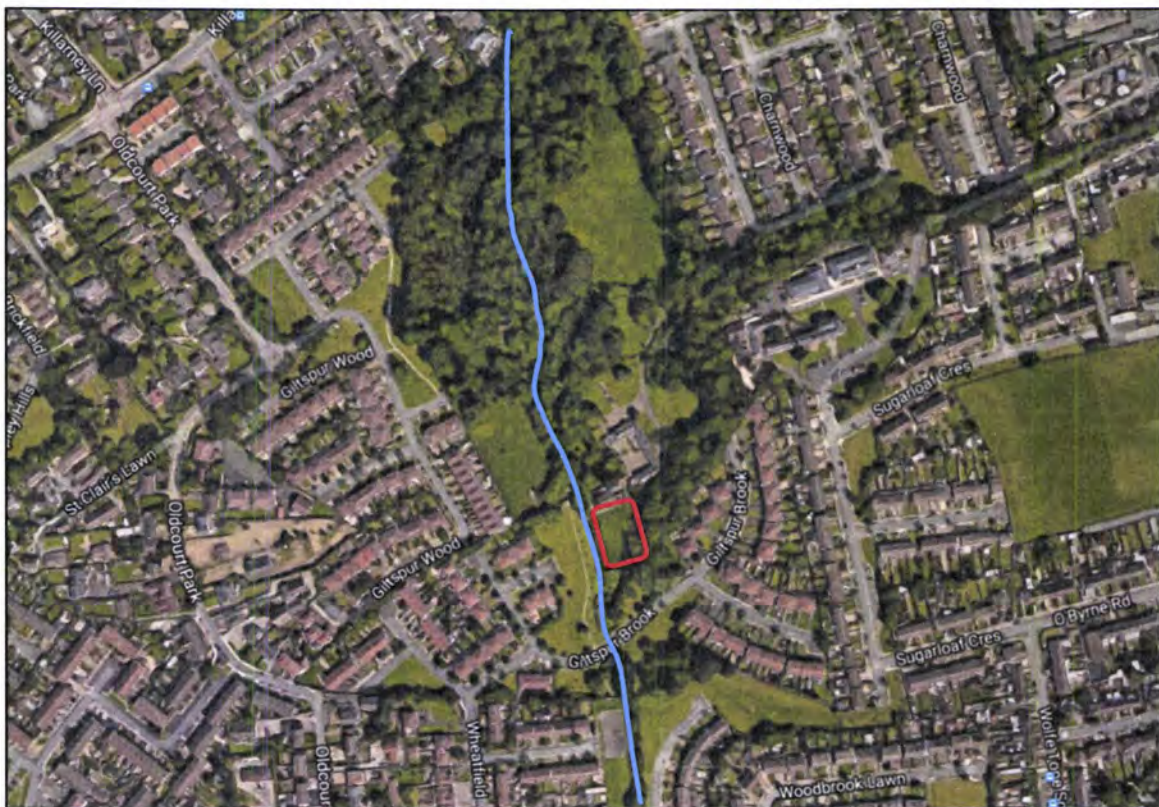


Figure 1.1 – Site Location

The area is surrounded by residential estates to the east, west and south, with Oldcourt House and gardens to the north.

### 1.3 INFORMATION USED

Barrett Mahony Consulting Engineers Ltd. (BMCE) have used the following information to prepare this report:

- Bray Municipal District Local Area Plan 2017 (2<sup>nd</sup> August 2017)
- Bray Municipal District Local Area Plan 2017, Strategic Flood risk Assessment



- Marston Planning Formal Submission Ref 16017
- Bray Municipal District Local Area Plan 2017, Land use zoning map

In addition to the above information, a site walkover was carried out by an engineer from BMCE on 4<sup>th</sup> September 2017 to review the area in question as well as upstream and downstream in the Swan River.

#### 1.4 QUALIFICATIONS

This report has been prepared by BMCE (civil and structural engineers). The BMCE report has been prepared by the following personnel:

**BMCE report prepared by:**

Paul Stephenson BE(Hons), CEng, MIEI

**BMCE report approved by:**

Ciarán Kennedy BSc(Hons) StructEng Dip Struct Eng MStructE MIEI CEng FConsEI

## 2. SITE SURVEY AND OBSERVATIONS

### 2.1 TOPOGRAPHY

The topography of the area surrounding the subject site is undulating, but generally falling to the north towards the River Dargle in Bray. The site and much of the area to the east of the Swan River, upstream is relatively level with the river bank.

On the west side of the river the ground rises sharply from the river bank.

This is illustrated on Figure 2.1 below.

### 2.2 GENERAL OBSERVATIONS

There is an existing 2m high concrete block wall separating much of the site from the river. At the north end of the site, the wall crosses to the west of the river, effectively bringing the river into the site.

A double pipe culvert formed with 1050mm precast concrete pipes exists approximately 20m after the river crosses the boundary into the property.

After this culvert the river channel is relatively uninterrupted with a roughly rectangular channel cross section with an approximate width of 3m and depth of 1.5m.

Before the river crosses into the Oldcourt House property its banks are overgrown. However, the banks are minimally vegetated within the property due to the large trees overshadowing the area preventing low level growth.

Some photographs of the above observations are appended to this report.

### 2.3 WETLANDS

There was no evidence of wetlands or waterlogged ground within the site in question inside the boundary of Oldcourt House.

Some wetland plants were noted 100m south of the site on the east side of the river, in an area of ground which is noticeable lower than the riverbank. This area is outside the site in question with an road embankment of the neighbouring Giltspur Brook estate in-between which prevents any over-ground flow.

### 2.4 UPSTREAM

The river was traced upstream and found to start approximately 750m from the site, in a field north of the R768. It may have been culverted from the north, but no trace of the river was found in the higher ground to the south of the road.

The areas which the river flows through for the visible section are all residential estates, with small grass verges of 20m to 50m on both sides and a significant amount of impermeable area in the housing estates beyond this. This would appear to have the effect of intercepting and diverting rainfall into the public sewer which would otherwise have found its way into the river.



## 2.5 DOWNSTREAM

Downstream of the site the Swan River flows 1km to where it joins the River Dargle. It falls over 30m over the course of this distance. The river bed gradient appears shallow in the vicinity of the site and for 100m downstream, after which it falls steeply below an old stone bridge and the flow is more rapid downstream.

On the day of the site visit the flow in the river was low, with a water depth of 200mm to 300mm in the deepest zones.



Figure 2.1 – Observations

### 3. FLOOD RISK ASSESSMENT REVIEW

The Bray Municipal District Local Area Plan 2017 includes a flood risk assessment (FRA) document which outlines the rationale behind the assessment and gives an overview of why each area is designated with the respective flood risk categories.

The introduction to this document lists the key planning principals which it follows (in accordance with the Flood Risk Guidelines). Most of these are not applicable to the green field residential site at Oldcourt House in Bray. Those that may apply are as follows:

- *Avoid inappropriate development in areas at risk of flooding*
- *Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water runoff.*

BMCE believe that both of the above planning principals would not be breached by zoning the land in question for residential housing. The reasons supporting this are presented in the next section.

Clarification of advice in the Flood Risk Guidelines on two matters was issued in 2014. These items are addressed in the Bray FRA report as follows:

Firstly, the PFRA and CFRAM flood maps have been consulted in carrying out the flood risk assessment. Reviewing these maps, it is evident that the PFRA map shows the area of the site in question as subject to flooding in a 100-year event, and appears to have been copied directly for use as the flood risk assessment map.

There is no pluvial CFRAM mapping for Bray so this could not be consulted. Therefore, the assessment relies completely on the less detailed PFRA.

Secondly, local knowledge, site specific risk assessments and engineering judgment from a suitably qualified engineer is to be used in the assessments where appropriate. If 'vulnerable use' zoning (such as residential) is proposed in flood risk areas it would require these processes to be carried out by the planning authority to suggest suitable flood mitigation strategies, if deemed necessary after the process.

It appears that the second step was not undertaken for the site in question. BMCE suggest that if it is carried out, this would prove the site is acceptable for residential zoning without mitigation measures. This is discussed further in the next section.

#### 3.1 ZONING AND LAND USE

Chapter 11 of the Draft Bray Municipal District Local Area Plan 2017 addresses zoning and land use. The area in question is currently zoned as 'OS2: Open Space'. The explanation of this zoning lists several reasons for the designation – *'flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity'*.

The only points on this list which may apply to the site are flood plains or buffer zones. The next section outlines why it is not believed to be a flood plain and why a buffer zone is not required in this area. As the site is private land it cannot act as a green corridor and similarly it does not appear to be an area of biodiversity as there are no plants apart from grass in the field.

It is proposed to rezone the site as existing residential due to it being within the curtilage of Oldcourt House.

The area is perfectly situated to provide the description of residential zoning which is outlined in the report as *'Residential developments . . . well linked to the town center and community facilities . . . meet household needs and promote balanced communities'*.

#### **4. CASE FOR RE-ZONING**

This section presents the reasons why BMCE believe that it is appropriate to re-zone the site in question as existing residential due to it being with the curtilage of Oldcourt House.

##### **4.1 RIVER MORPHOLOGY AND CATCHMENT**

As outlined in section 1, the head of the river is approximately 750m from the site in question, and it runs mainly through areas of residential housing estates. This all serves to reduce the catchment area. The PFRA shows an area of groundwater flooding at the head of the river, presumably based on the rising topography to the south.

The runoff along the length would be significantly reduced by the amount of hardstanding in housing estates which serves to divert rainfall into the public sewers.

The open field which is subject to groundwater flooding is unlikely to cause problems in excess of what has occurred in the past.

Downstream of the site, the river bed steepness increases significantly and the flow is unobstructed due to large trees blocking out the light and preventing overgrowth on the banks. This serves to provide a potential for conveying large amounts of water away from the site in the case of higher flows in the river

The implication of the above commentary is that the flood risk of the site in question is reduced.

##### **4.2 LOCAL KNOWLEDGE**

The current owner and lifetime resident of Oldcourt House confirmed that the property and lands have never flooded due to the Swan River breaking its banks while he has lived there. This is over a period of approximately 60 years and therefore includes the 1986 Hurricane Charley flood which is one of the biggest flood events in the history of Bray.

##### **4.3 PROPOSED CHANGES**

As part of any development it is proposed to remove the double concrete pipe culvert downstream of the site. This is the only constriction of the channel which may cause a back-up during extremely high flows.

The implication of the removal of this culvert is that the channel is unobstructed, thereby reducing the flood risk at the site.

##### **4.4 SITE SPECIFIC FLOOD RISK ASSESSMENT**

In order to re-zone the area it is anticipated that the planning authority would be required to carry out a site specific flood risk assessment. During this process if it were deemed necessary that any flood risk mitigation measures were required, these could be incorporated into the development with minimal difficulty. Such measures may include:

- Minimum ground floor levels for houses in this area.

- A low flood defence wall or embankment running along the east bank of the river at a set height and for a set distance downstream and upstream to the nearby bridge (~50m), as deemed necessary.

If any further information such as a site specific topographical survey is required to facilitate this assessment, this can easily be arranged.

#### **4.5 CONCLUSION**

Based on the information presented in this report BMCE suggest that the site in question has a negligible risk of flooding and should not be deemed a flood risk in the context of the principals set out in the Flood Risk Guidelines.

If any further information is required to supplement this report, please do not hesitate contact us.

**APPENDIX A – SURVEY PHOTOGRAPHS**





View of the east side of the site



View of the west side of the site with the stream bank behind the block wall





Culvert within the site to be removed.



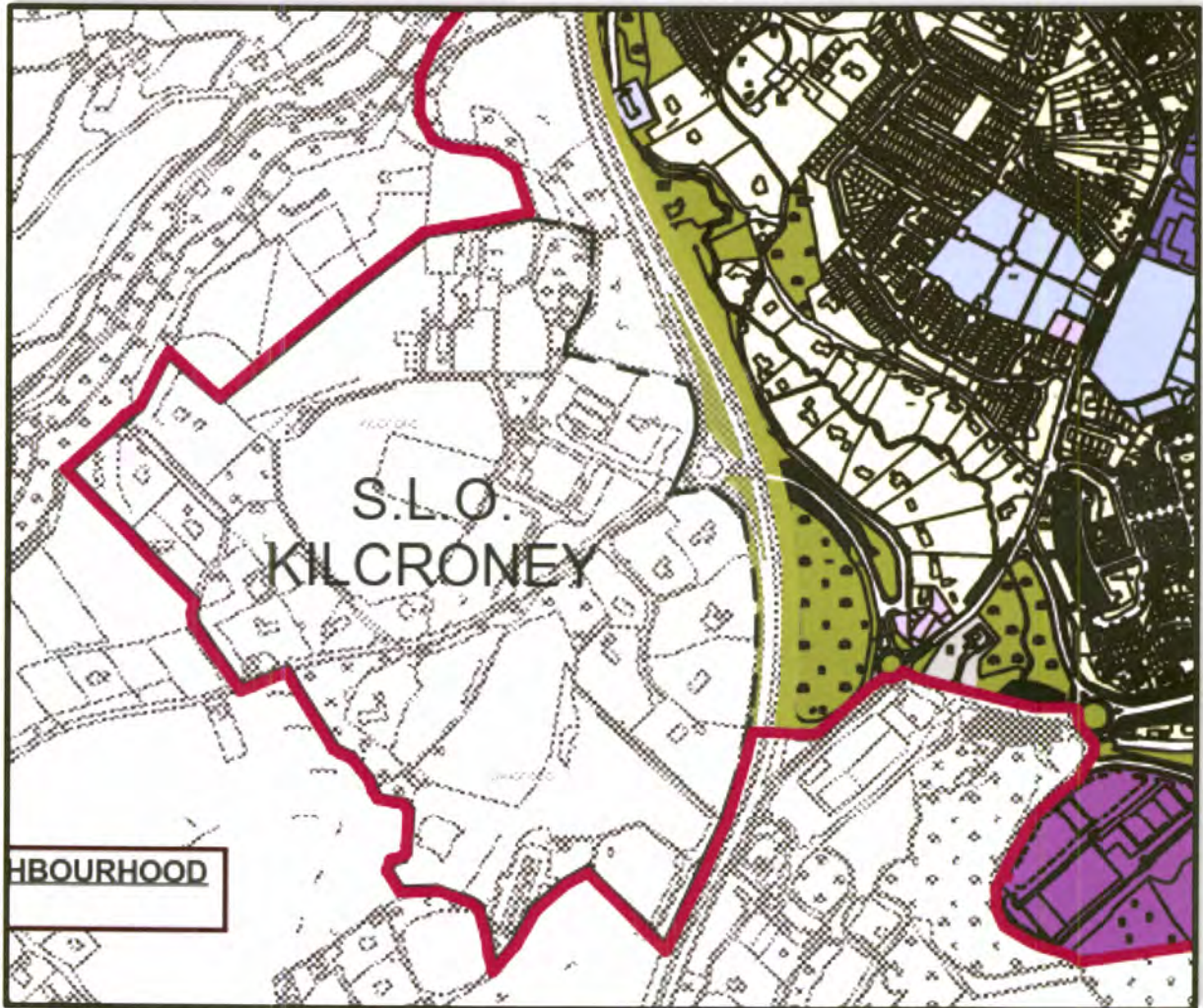
View of the stream flowing along the west side of the site outside the boundary wall. **Error! Not a valid bookmark self-reference.**



**PLANNING SUBMISSION**

**BRAY DRAFT MD LOCAL AREA PLAN 2017-2023**

**KILCRONEY NEIGHBOURHOOD SPECIFIC LOCAL OBJECTIVE**



**SHANE AND TANJA REIHILL**

*15<sup>th</sup> September 2017*

**FRANK O'GALLACHÓIR &  
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Associates Ltd.



Planning & Development Consultants

Our Ref: J17-004

Bray MD LAP  
Planning Department  
Wicklow County Council  
County Buildings  
Wicklow

Date: 15<sup>th</sup> September 2017

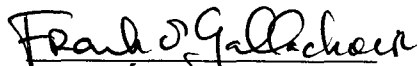
**BRAY DRAFT MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023**  
**KILCRONEY NEIGHBOURHOOD SPECIFIC LOCAL OBJECTIVE**

Dear Madam,

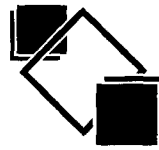
On behalf of our clients Shane and Tanja Reihill, we wish to make a submission regarding the Development Plan for the consideration of the Council. Our submission follows.

Please contact us if we can be of any further assistance on any of the matters raised. Please address all correspondence to the undersigned.

Yours sincerely,

  
Frank Ó'Gallachóir  
Dip. T.C.P., M.Sc., M.I.P.I.

**Enc: Bray MD Local Area Plan Submission**



**BRAY MD LOCAL AREA PLAN 2017-23**

**KILCRONEY**

**SHANE AND TANJA REIHILL**

## **1. INTRODUCTION & SUBMISSION OBJECTIVE**

Our clients Shane and Tanja Reihill own circa 5.5 ha (13-14 acres) at Kilcrouney Lane, on the outskirts of Bray, Co Wicklow. The lands are located to the west of the M11 road and gain access to it by way of a grade-separated junction, Junction 7. See Figure 1 Location & Draft Bray MD Local Area Plan.

The objective of this submission is, as follows:

- To extend the Bray plan boundary to include lands in the immediate vicinity of the Kilcrouney interchange to provide for an integrated development of a new neighbourhood.
- To include a Specific Local Objective (SLO), to develop this land, as a new residential neighbourhood with mixed residential, commercial, educational, community and open space uses, with appropriate requirements, and appropriate densities.

## **2. BACKGROUND**

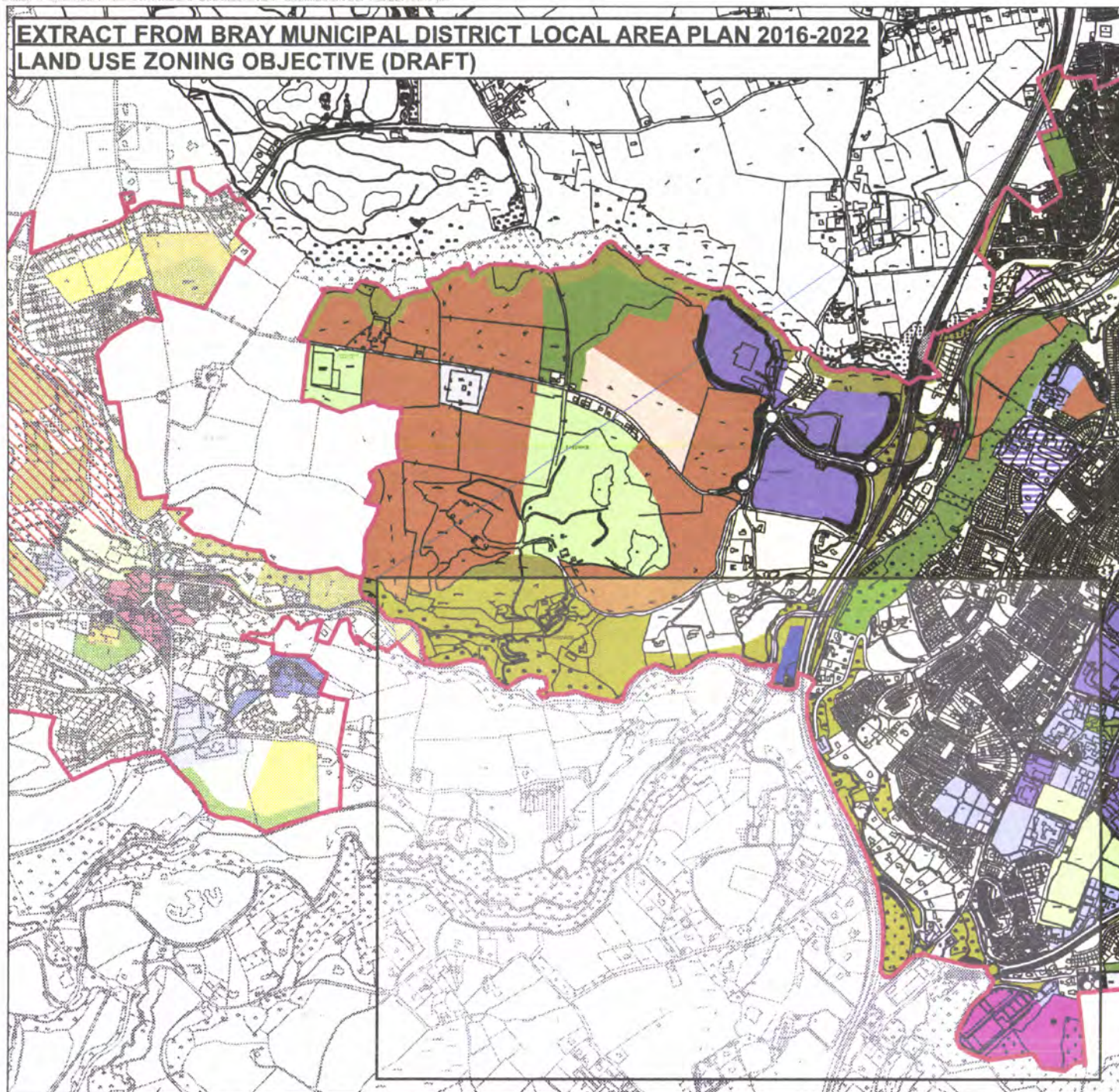
### **2.1 Area Description**

This area is located immediately adjacent to junction 7, an existing grade separated interchange which joins the Bray Southern Cross Road to the N11/M11. It is an existing multi-landuse area, comprising of the following. See attached Figure 1.

1. Badger Hill House and adjacent lands (c 5.7 ha.).
2. The Dublin Oak Academy, a boys' boarding school (c 15.5 ha.).

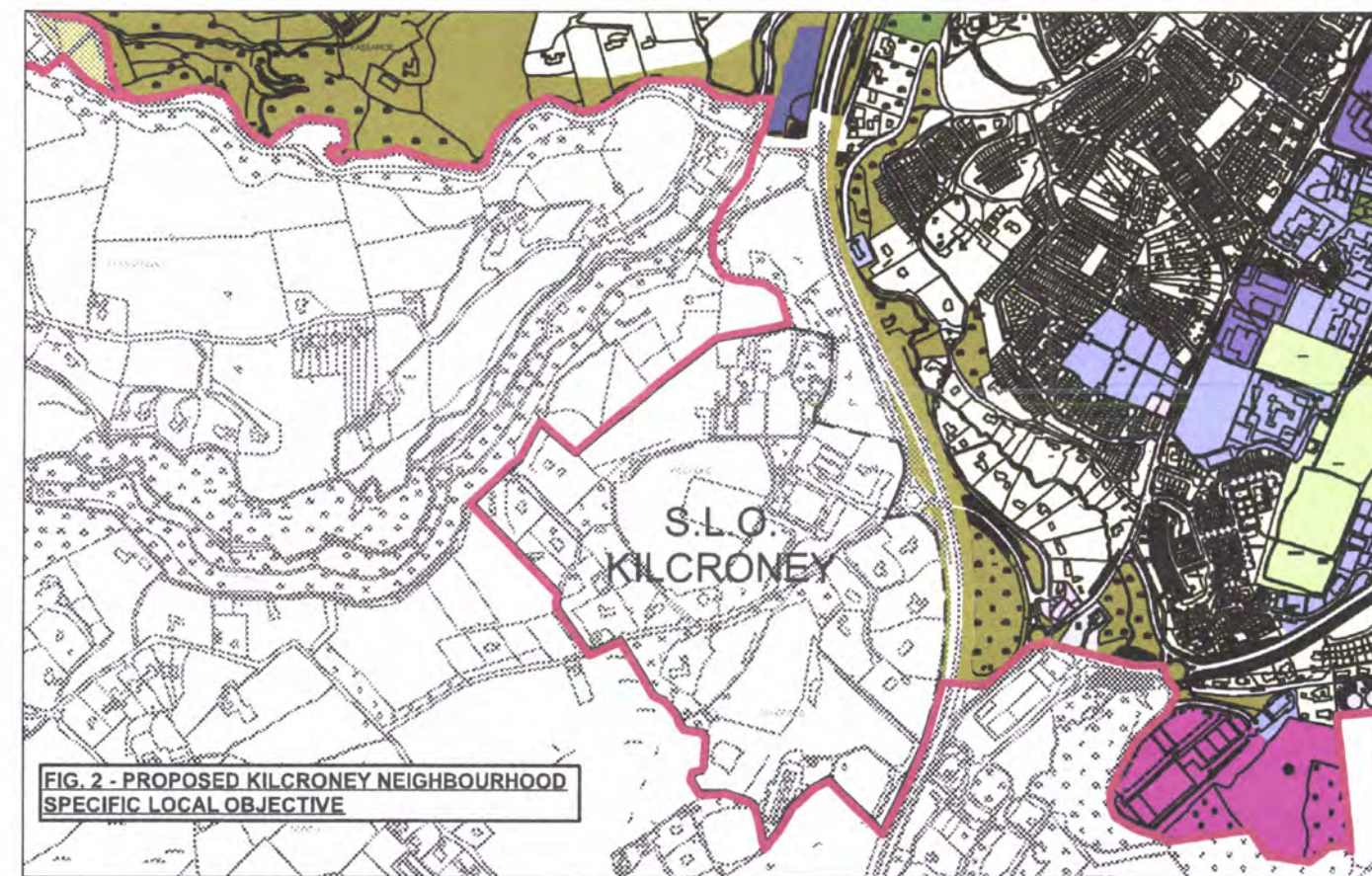
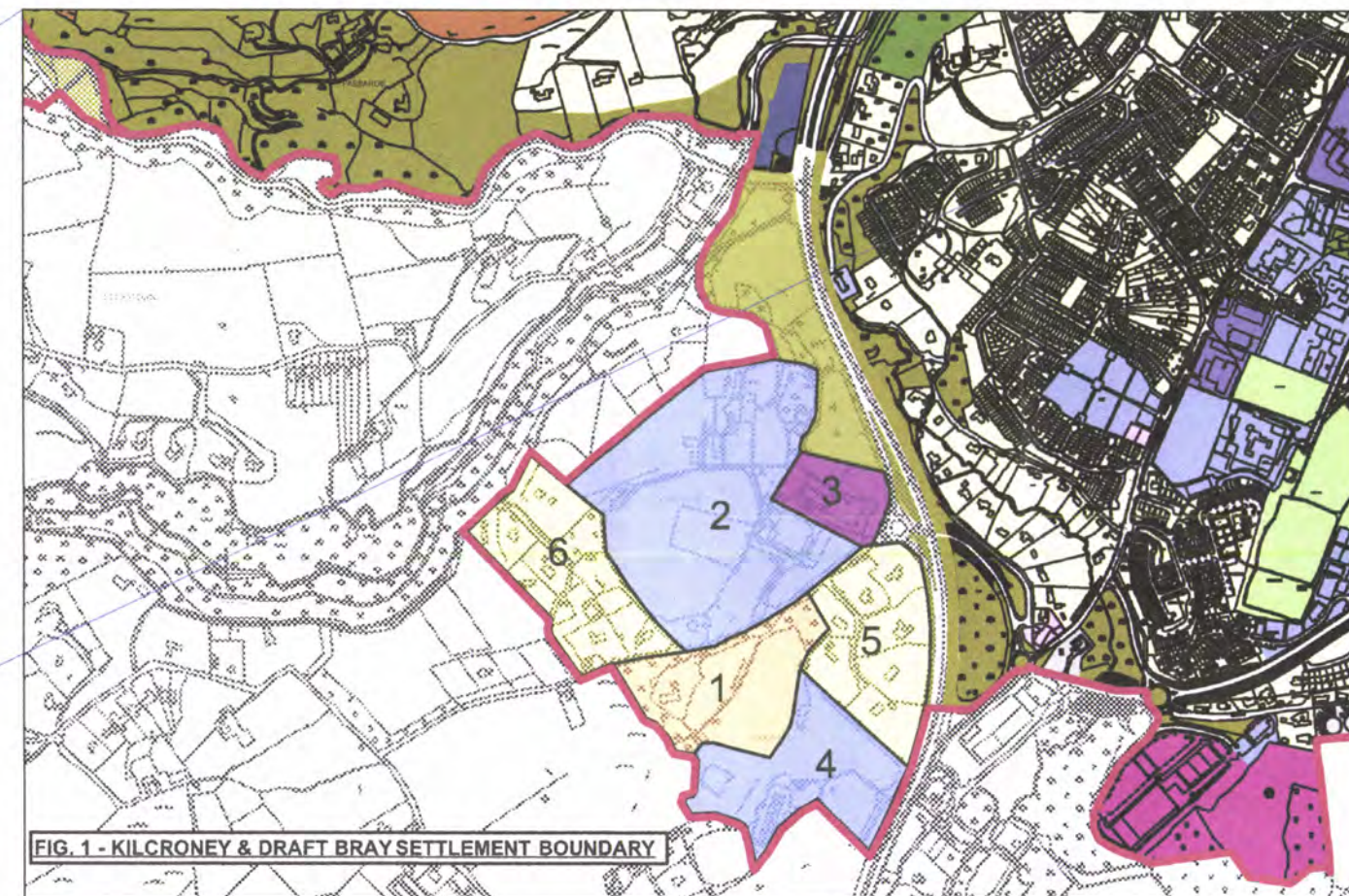


EXTRACT FROM BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2016-2022  
 LAND USE ZONING OBJECTIVE (DRAFT)



EXTRACT FROM BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2016-2022  
 LEGEND - LAND USE OBJECTIVES

Municipal District Boundary	TC Town Centre	AOS Active Open Space
Settlement Boundary	NC Neighbourhood Centre	OS1 Open Space
RE Existing Residential	LSS Local Shops & Services	OS2 Open Space
R-HD New Residential	E Employment	SF Bray Seafront
R20 New Residential	E Special Employment	GTH Bray Gateway & Transport Hub
R15 New Residential	FI Film Industry	KD Kilruddy Demesne Conservation & Tourism Zone
R10 New Residential	T Tourism	PU Public Utility
R Special New Residential	MU Mixed Use	CE Community & Education
		Conservation Area
		Bray Head SAO



**THE PADRAIG SMITH PARTNERSHIP**  
 ARCHITECTS PLANNERS DESIGNERS

Merkel Square  
 Wicklow  
 Ireland  
 Phone 0404-69478  
 Fax 0404-66584

PROJECT: **KILCRONEY NEIGHBOURHOOD SPECIFIC LOCAL OBJECTIVE**

TITLE: **BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN -AMENDMENTS**

SCALE: \_\_\_\_\_

DATE: MARCH 2017

OUR REF: OUR REF

NO: PP 02-02

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3. Kilcroe Furniture, a retail warehouse (c 2.19 ha.).
4. The Woodlands Academy, a girls' boarding school (c 6.17 ha.).
5. Wingfield housing estate comprising eight houses (c 6.02 ha.).
6. Millicent Lane, comprising five houses (c 6.56 ha.).

### **2.3. Existing Development Plan**

This area forms part of the 2009 Bray Environs Local Area Plan area. This area is located on “white” i.e. unzoned land. It is therefore treated as a rural area, within the Bray Environs Development Plan boundary. Therefore, rural areas policies apply. Despite this, and due largely to historical factors, permitted mixed commercial, educational and housing developments exist, side-by-side, in this area.

### **2.4 Bray Draft Municipal District Local Area Plan 2017-2023**

The Bray settlement boundary in the Draft Municipal District Local Area Plan does not include these lands at present. Therefore, these lands continue to be unzoned land and considered as part of the rural area outside of Bray.

## **3. SUBMISSION PROPOSAL**

### **3.1 Submission Request**

We request the Planning Authority to:

- To extend the Bray plan boundary, to include lands in the immediate vicinity of the Kilcroe interchange, to provide for an integrated development of a new neighbourhood.
- To include a Specific Local Objective (SLO), to develop this land, as a new residential neighbourhood with mixed residential, commercial, educational, community and open space uses, with appropriate requirements, and appropriate densities. See Figure 2.



### **3.2 Rationale for the Submission**

We believe this rezoning proposal is sustainable, and in accordance with the proper planning and sustainable development of the Bray area. Our reasons are as follows:

#### **3.2.1 Delayed Achievement of Bray Housing Targets**

The core strategy of the Municipal District Local Area Plan, as it refers to Bray Town, is predicated on major housing developments occurring at Fassaroe, and at the former Bray Golf Club. The balance of 30% of the total new housing requirement would be provided on designated infill sites.

However, there are likely to be delays in housing provision particularly in the short and medium-term, when there is currently a great demand for new housing in Bray.

- The Fassaroe area proposal for 3,700 new houses is subject to public transport availability, to justify the high-density residential zoning, and to prevent the massive generation of car-based commuting. However, the proposed Fassaroe Luas station and Luas connection, is no longer Government policy. Furthermore, there are no proposals, or commitments, to provide a QBC to serve this area, and/or to connect it, to Bray dart station, or to the Luas station and Carrickmines. It is therefore, in our opinion, unlikely that there will be 3,700 house completions in Fassaroe, in the 6-year period of this plan.
- The former Bray Golf Club lands are targeted to provide 1,000 new houses. However, the extant planning permission, which was granted in 2010, does not satisfy existing housing preferences, nor the Draft MD LAP proposed housing density requirements. Any new planning application, needs to comply with the terms of the new Bray Municipal District Local Area Plan. The new MD LAP significantly changes the development objectives for this area. Therefore, there is likely to be a significant time delay, before new houses are provided on these lands.





- There are 12 infill sites in Bray, in the Draft Bray Municipal District LAP, designated for high density housing. However, there is no guarantee that these ambitious housing density objectives will be met. This is particularly so, because infill sites, in accordance with Government planning policy, must respect the existing character and densities, of surrounding areas. Surrounding property owners are likely to demand appropriate development of these infill sites, which respects the amenities and character of existing properties. These issues will only be resolved, through the planning application and planning appeal processes. We believe that the density objectives, for these infill site, are unlikely to be fully met.
- Therefore, for the variety of reasons listed above, it is unlikely that the ambitious housing targets listed in the Municipal District Local Area Plan for Bray, will be met, unless more headroom is provided. A new neighbourhood of Kilcronee could be developed in a relatively short time, subject to suitable zoning in the new Municipal District Local Area Plan.

### **3.2.2 Existing Mix of Land Uses at Kilcronee**

The Kilcronee interchange (Junction 7) is the only interchange serving Bray, within the Wicklow County Council area, which does not have zoned land on its western side. This area already contains, two post-primary boarding schools, a furniture retail warehouse, and the Wingfield housing estate. All of these developments have been permitted by the Planning Authority in this rural area.

Given the existing pattern of development, and the mixture of land uses in the area, it is sustainable to consider a new neighbourhood, at Kilcronee.

### **3.2.3 Development Plan Context – Nature and Conservation Designations**

The existing Bray Environs Plan contains policies, identifying environmental designations requiring protection, such as Natural Heritage Areas, Areas of Outstanding Natural Beauty and Greenbelt areas. It also includes protected views and prospects. None of these environmental designations, or listed views or prospects, relate to the subject area at Kilcronee. The Dargle



Valley SAC is located to the north of the Kilcronee area, between it, and the new Fassaroe neighbourhood. It is therefore clear that a new neighbourhood could be developed, in this area, without impact on any designated sites, or protected views.

### **3.2.4 Compliance with Draft MD Objectives and Policies**

This Kilcronee neighbourhood proposal has had detailed regard, to the policies and objectives contained in the Draft Bray Municipal District Local Area Plan.

- It has regard to the Preamble, which contained a longer horizon, up to 2025, to assist in meeting housing targets, by helping to avoid impediments to the development of certain sites, and to ensure sufficient headroom is provided.
- It is in compliance with the Physical Context statement at 2.2.3, which states that growth to the west of the N11 is feasible, but must take cognizance of existing access points across the N11, and the maintenance of a break between Bray and Enniskerry. Indeed, the proposed neighbourhood at Kilcronee is distant from Enniskerry, and separated by greenbelt from Kilmacanogue village.
- The Vision for Bray, at part 2.2.3, includes the provision and facilitation of the rapid delivery of the maximum number of housing units. This Kilcronee proposal facilitates this vision.
- The Kilcronee proposal does not encroach on any sensitive sites, listed in the Draft Bray Municipal District Local Area Plan

### **3.2.5 Traffic and Transportation**

The Kilcronee lands are close to the existing Junction 7, which is a grade-separated interchange linking Bray south to the N11/M11. It is the main interchange serving Bray south. Whereas there are some capacity issues at times, this junction could be significantly improved with development contributions arising from the development of the Kilcronee neighbourhood. Proposals exist to enhance the capacity of the N11/M11 corridor in this area from 2 to 3 lanes.



Furthermore, there are proposals to improve the capacity at Junction 7. See attached AECOM Engineering Report.

The Kilcrouney interchange, and the subject lands, are served by bus services from Bus Eireann, Dublin Bus and Finnegan Bus. These services connect Kilcrouney to Bray and Dublin, and to public transport at Bray Dart station, and to the Luas, at Carrickmines station. See attached AECOM Engineering Report.

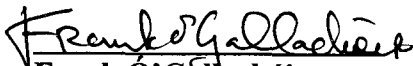
### **3.2.6 Piped Infrastructure**

There are several watermains running along Kilcrouney Lane, including a 24" diameter main. There is also a 100 mm watermain, serving this area located on Kilcrouney Lane. See accompanying AECOM Engineering Report.

There is an existing 225 diameter gravity foul sewer available to serve this area which discharges into the Bray sewerage system, See Figure 3. See attached AECOM Engineering Report.

## **4. CONCLUSION**

We request the Planning Authority to take this submission into account and to rezone this land.

  
**Frank Ó'Gallachóir**  
**Dip. T.C.P., M.Sc., M.I.P.I.**

*Figure 1 Kilcrouney and Draft Bray Settlement Boundary*

*Figure 2 Proposed Kilcrouney Neighbourhood Specific Local Objective*

# Submission to Wicklow County Councils 'Draft Bray Municipal District Local Area Plan 2017'

<b>To</b> Padraig Smith Partnership Ltd.	<b>Project number</b> 60540530	<b>Client</b> Padraig Smith Partnership Ltd.	<b>Subject</b> Proposed Residential Development at Badger Hill, Kilcronee, Co Wicklow
<b>Date</b> 15 September 2017	<b>Issued by</b> Clodagh Holmes	<b>Reason for issue</b> Submission to Wicklow County Council	<b>Prepared by</b> AECOM

## 1.0 Introduction

AECOM has prepared this technical note, which should be read in conjunction with the main submission, prepared by Frank O'Gallachoir, to Wicklow County Council in relation to the 'Draft Bray Municipal District Local Area Plan 2017'.

This Technical Note considers the Engineering aspects of the proposed Kilcronee Local Neighbourhood and examines its suitability for future development in the context of the planning framework set out in the Draft Bray Municipal District Local Area Plan 2017. The report looks at both road access and service provision for the subject area. Section 2.0 of this report sets out the general planning issues pertaining to the lands whilst Section 3.0 and 4.0 of this report specifically discusses the suitability of the lands for development in relation to road access and service provision.

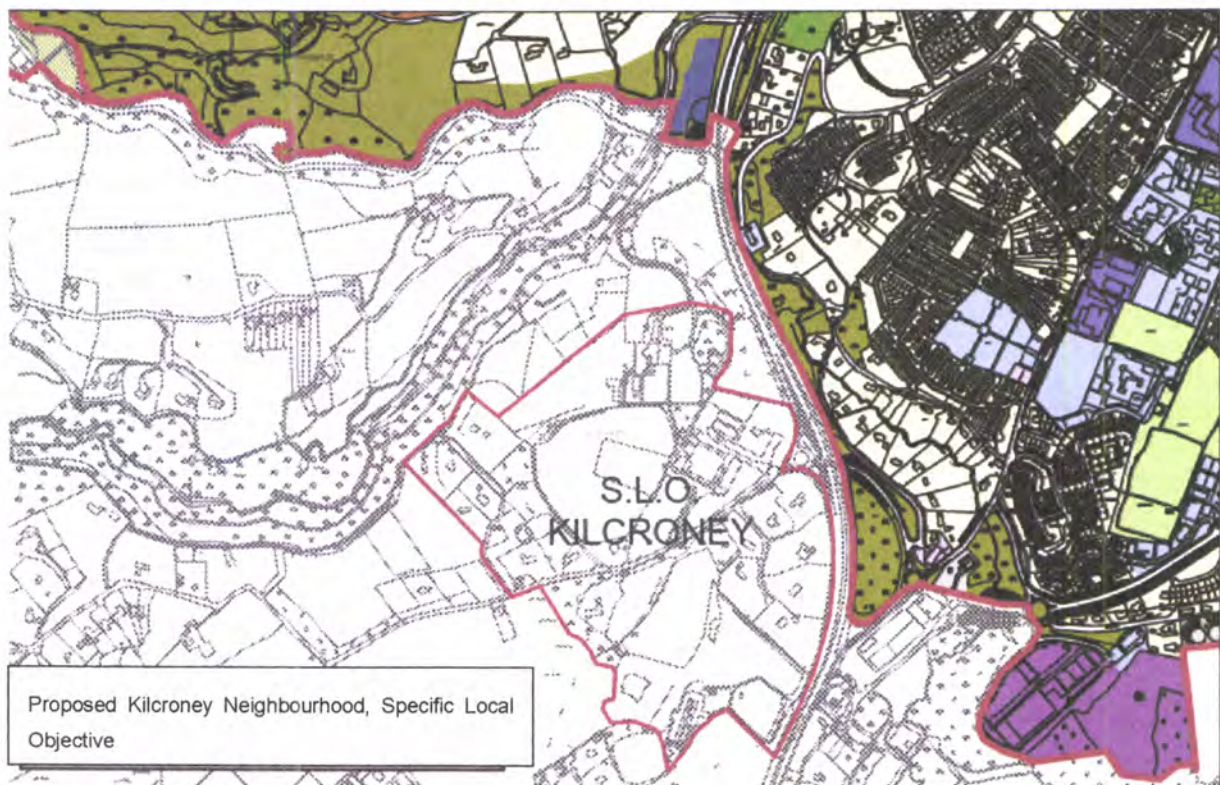


Figure 1 –Proposed Kilcronee Neighbourhood, Specific Local Objective, Co. Wicklow



## 2.0 Draft Bray Municipal District Local Area Plan 2017

Wicklow County Council is currently inviting submissions on the Draft Bray Municipal District Local Area Plan 2017. Once formally adopted, the LAP will present the statutory planning context for the subject site. The Bray Draft Land Use Zoning Map has also been published by Wicklow County Council.

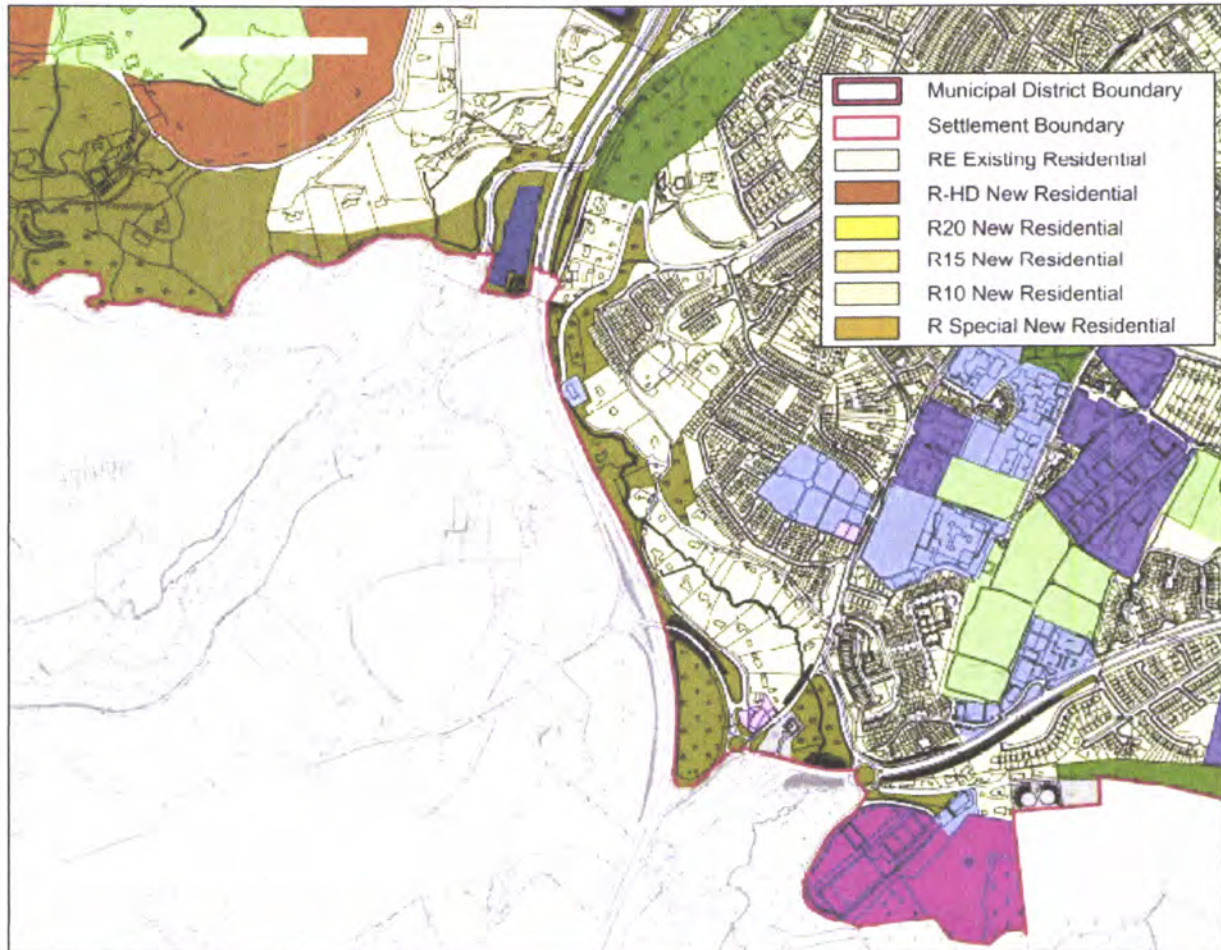


Figure 2 –Current Bray Zoning Map (Source: Draft Bray Municipal District Local Area Plan 2017)

As illustrated in Figure 2, the subject lands are located outside of the Settlement Boundary within the Zoning Plan for Bray and have no specific zoning.

The objective of the overall submission is, as follows:

- To extend the Bray boundary to include lands in the immediate vicinity of the Kilcrony interchange to provide for an integrated development of a new neighbourhood.
- To include a Specific Local Objective (SLO), to develop this land, as a new residential neighbourhood with mixed residential, commercial, educational, community and open space uses, with appropriate requirements, and appropriate densities.

### 3.0 Road Access & Traffic

It is acknowledged in Page 9 of the Draft Bray Municipal District Local Area Plan 2017 that the development of Bray in the latter half of the 20th century was “principally focused on the lands between the town centre and the seafront and to the west as far as the natural boundary formed by the Dargle River initially, with the construction first of dual carriageway and then the M11 ‘Bray – Shankill bypass’ in 1991 ultimately forming a western boundary to the development envelope.”

The Draft Bray Municipal District LAP recognises that when considering how and where future growth and development will be facilitated, the historical and the physical limitations are recognised, one item of note:

- *“Growth of the town to west of the N11 is feasible, but must take cognisance of existing access points across the N11 and the maintenance of a break between Bray and Enniskerry.”*

In cognisance of the above point, this submission has assessed the characteristics associated with the respective lands for inclusion within the zoning plan for Bray on the basis that the principal of development extending westwards beyond the N11/M11 has already been accepted.

The lands are located to the south west of Bray Town Centre and are accessed off Kilcrone Lane.

Kilcrone Lane is a single carriageway for its entire length with an approximate width of 6m. The road is lightly trafficked and connects directly to the N11 to the east via a four arm roundabout and Glencormick North Lane to the west via a simple priority junction.

The Kilcrone Lane connects directly onto the M11 Interchange links to the M11 itself which is a key commuter route and provides access to Dublin City to the north and Wicklow / Wexford to the south. Regional Road 767 provides a direct link from Kilcrone to Bray Town Centre via the R768/R767 roundabout.

As such, the subject lands are very accessible to the M11 for longer journeys to Dublin City and Wicklow Town and also to the local road network for travelling to Bray town centre and Bray Dart station.

The nearest bus stop is located on Southern Cross Road, which is approximately 750m from the extremity of the subject lands. This stop is serviced by no. 84x, which travels from Newcastle / Kilcoole to Hawkins Street, Dublin City Centre. Figure 3 illustrates the bus stop location in relation to the proposed lands.

This bus stop location also services the privately operated Finnegan bus route which provides a regular bus link to the Bray DART station.



Figure 3 – Bus Stop in the vicinity of the site lands

A traffic count was carried out in May 2017 to indicate the existing peak hour traffic volumes on Kilcroney Road in Table 1 below.

Table 1 Base Traffic Flows, Kilcroney Lane

Peak Period	Base Traffic (Total Two Way Trips)
AM (08:00 - 09:00)	172
PM (17:00 - 18:00)	196

As illustrated in Table 1, Kilcroney Lane is lightly trafficked; with the peak hour of traffic recorded was the PM Peak Hour (17:00 – 18:00) with a total of 196 vehicular trips.

Some queuing takes place on the southbound off ramp and the northbound off ramp during the evening and morning peaks respectively but quickly dissipate and generally the Kilcroney Lane / N11 Interchange (Roundabout Junction) appeared to be operating well within capacity except for during short peak hour periods indicating that there is still potential for further development potential without having a significant impact upon the capacity of the N11 Interchange.

In April 2017, Transport Infrastructure Ireland (TII) published the '*M11 / N11 Corridor Study (J4 M50 – J14 Coynes Cross) Needs Assessment Report*'. The study assesses the needs of the M11 / N11 National Road Corridor, whilst also considering the regional and local road network that supports and compliments the M11 / N11 corridor.

The TII study identifies in section 4.8 that the M11 / N11 mainline corridor will need to be increased as far south as Junction 8 (Kilmacanogue) in order to cater for the projected demand in 2030 based on current traffic growth projections. The TII Study (Section 5.2) includes a 'Do Minimum' scenario which proposes an upgrade to the M11 / N11 Corridor from 2 to 3 lanes between M11 Junction 5 and 8, which will enhance capacity along this respective section of national road corridor.

The TII study also considers Junction 7 Bray South interchange (Kilcronee) and the Killarney Road roundabout. Whilst it is noted that there is several potential options for increasing capacity at this junction, the study assessed the following scenario:

Junction 7 Scenario, closure of the existing on/off ramps and the implementation of a dumbbell interchange or similar. The proposals also consider a potential southbound lane drop and lane gain south of J7, and potentially northbound lane drop and lane gain north of J7.

The potential development impact associated with the proposed Kilcronee Neighbourhood will have a negligible impact upon the existing and future operation of the M11 / N11 and Junction 7. The Needs Assessment Report identifies that at a strategic level, it is considered necessary to widen to M11 / N11 mainline corridor, which will enhance capacity on the strategic road network. The proposals on the respective lands will not impact or impede any future works to the M11 / N11 corridor.

It is clear from the above analysis that the local road network has capacity to cater for the level of development associated with this proposed Kilcronee Neighbourhood, Specific Local Objective.

## **4.0 Service Provision**

### **4.1 Surface Water**

The subject lands and their environs have been examined to assess the services provision and identify any potential shortcomings in relation to sanitary service provision. It is noted that there is a stream flowing from south-west to north-east of the lands (refer to Figure 4).



This stream, subject to maintenance and cleaning provides an outfall for the surface water runoff discharge from the proposed development. This would be subject to incorporation of suitable SuDS measures within the proposed development such as soakaways, infiltration trenches, green roofs, rainwater harvesting and surface water attenuation facilities.

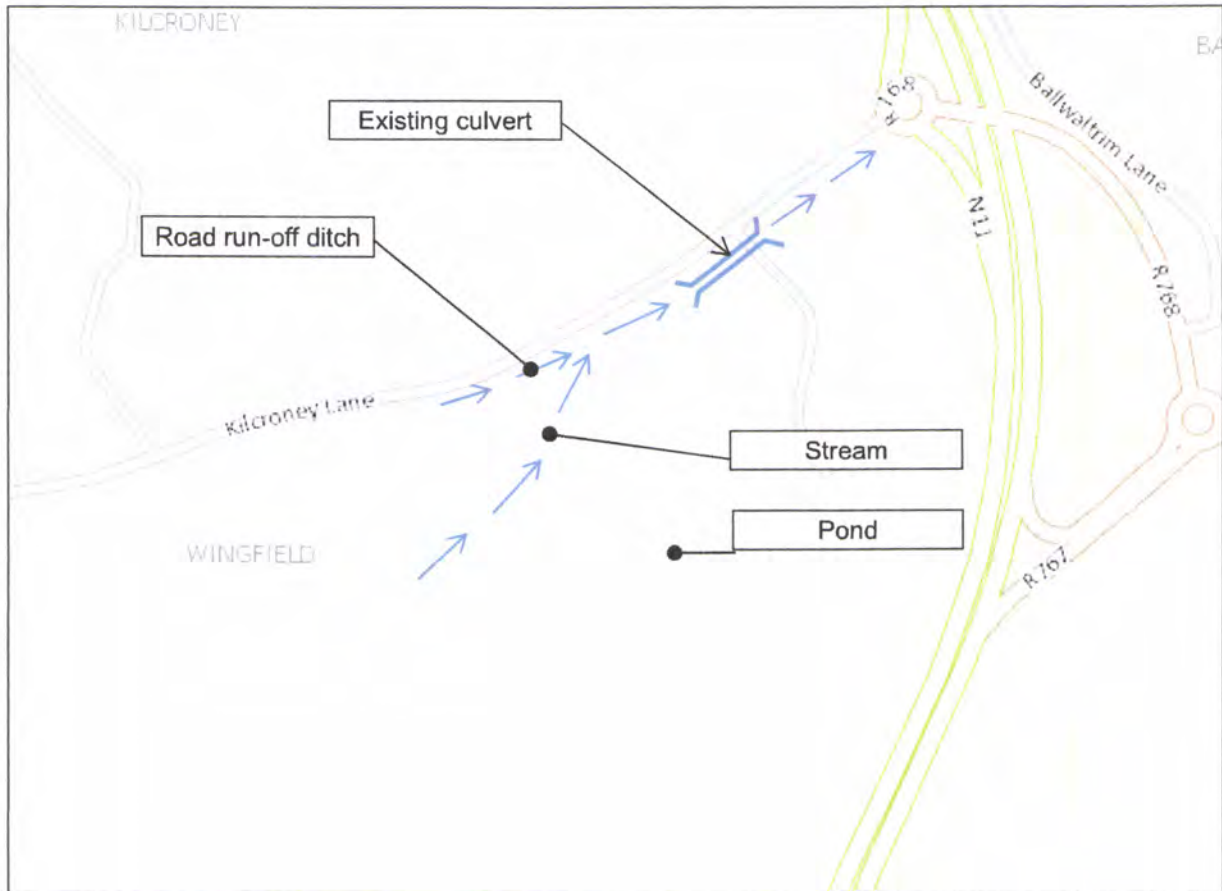


Figure 4 – Existing Stream, Kilcronee, Co. Wicklow

## 4.2 Foul Water Drainage

An existing dwelling on the subject lands is serviced by a septic tank system. Septic tanks are not compliant with the current EPA Standards Records provided by Irish Water indicate that there is a 225mm diameter concrete foul water sewer running in a northerly direction along N11 (refer to Figure 5).



Figure 5- Existing Foul Water Record Drawing

AECOM have submitted a Pre Connection Enquiry Form to Irish Water to initiate discussions with regard to the existing waste water network. It is envisaged to facilitate the disposal of foul water effluent from the proposed development lands to the existing sewer which runs along the N11.

### 4.3 Water Supply

Records provided by Irish Water indicate that there are a number of watermains running along Kilcroyne Lane (refer to Figure 6). These include the following:

- A 24 inch diameter Cast Iron watermain dated 1924
- A 100mm diameter Ductile Iron watermain dated 1996

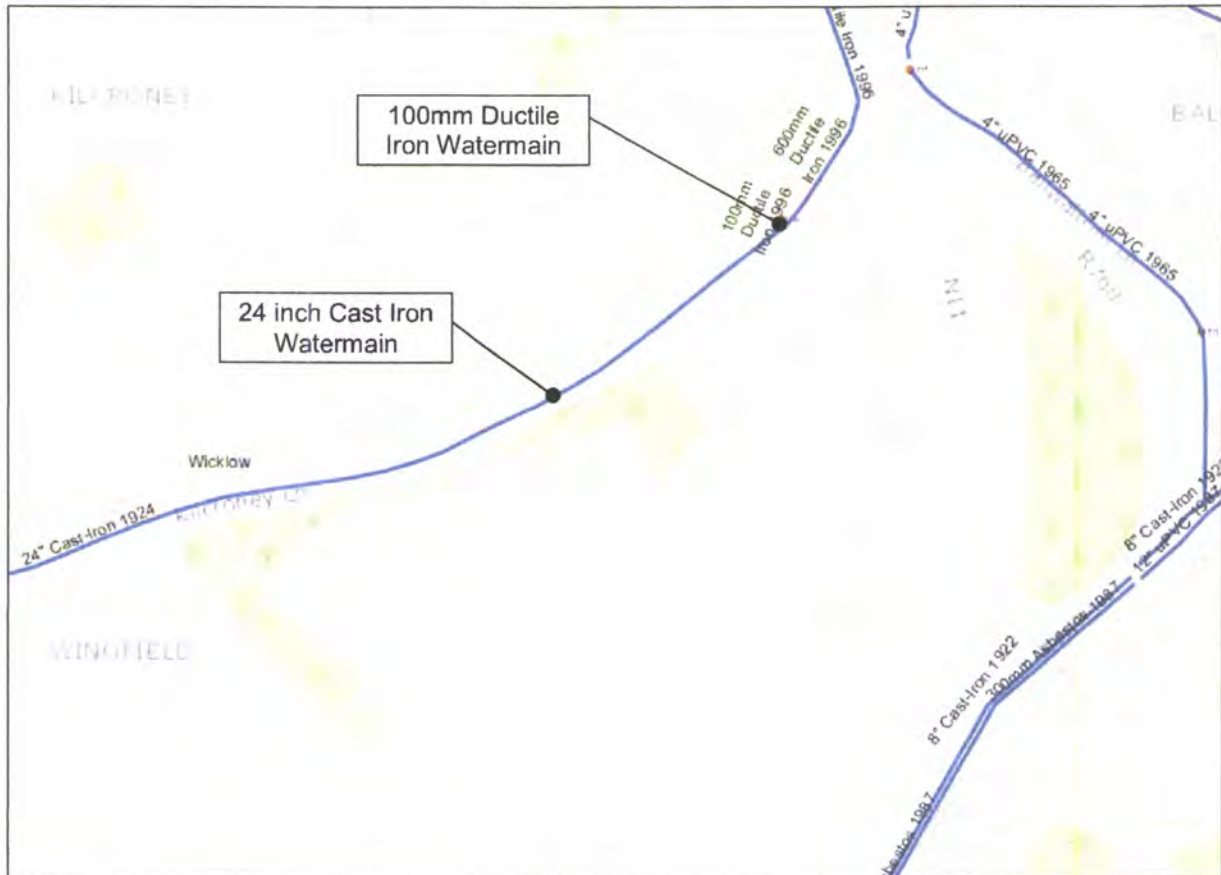


Figure 6 – Existing Watermain Record Drawing

Water in the Bray Environs area is provided by Dublin City Council. The Dublin Region 24 inch diameter watermain runs along Kilcroyne Lane. A 100mm diameter connection has been made in 1996 off the 24 inch diameter watermain to serve the developments to the north of Kilcroyne Lane (Dublin Oak Academy and Kilcroyne Furniture Warehouse).

AECOM has issued a Pre Connection Enquiry Form to Irish Water to initiate discussions with regard to capacity of the existing watermain network. These discussions are ongoing with Irish Water.

The existing 100mm diameter watermain off the existing 24 inch diameter watermain may be considered as a possible water supply for the proposed development.

## Flood Risk Identification

### Coastal Flood Risk

Coastal flooding results from sea levels which are higher than normal and result in sea water overflowing onto the land. Coastal flooding is influenced by the following three factors which often work in combination: high tide level, storm surges and wave action.

There is no risk associated with coastal flooding for these lands as general ground levels are much higher than expected extreme coastal flood levels.

### Fluvial Flood Risk

Fluvial flooding is the result of a river exceeding its capacity and excess water spilling out onto the adjacent floodplain.

The existing stream flowing through the lands was not covered in the Eastern CFRAM Study. Prior to development of the lands, a full Flood Risk Assessment is required to ensure that the existing stream will not pose a threat to the proposed development and mitigation measures are adopted accordingly.

Initial inspections would indicate that the stream which currently flows through the subject lands needs to be cleared and maintained.

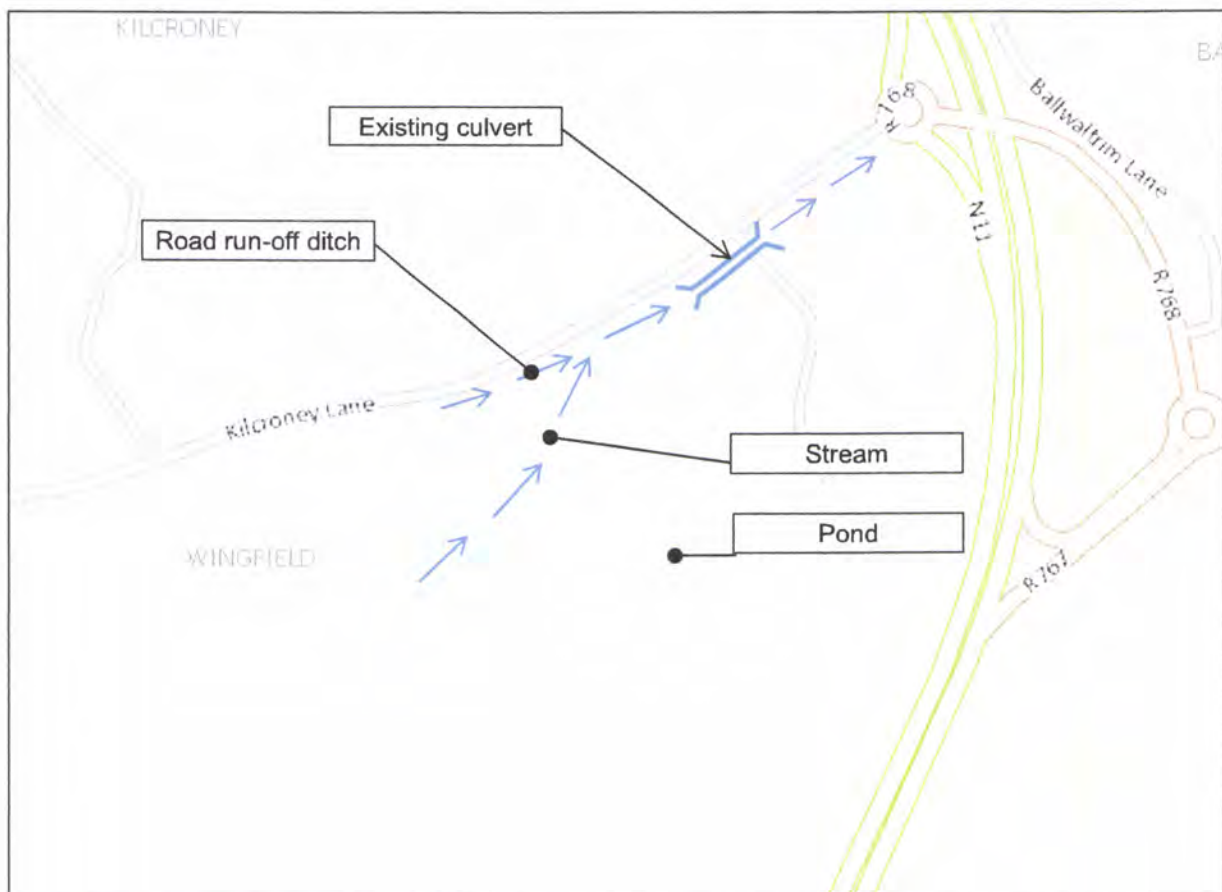


Figure 7 – Stream at Kilcronee, Co. Wicklow



## Pluvial Flood Risk

Pluvial flooding is a result of rainfall-generated overland flows which arise before runoff enters any watercourse or sewer. The intensity of rainfall can be such that the runoff totally overwhelms surface water and underground drainage systems.

Myplan.ie map incorporates different sets of spatial information, including OPW Flood Mapping data (fluvial, pluvial, coastal flooding data and groundwater flood extents).

Figure 8 is an extract from [www.myplan.ie](http://www.myplan.ie) and illustrates areas that may be at risk of pluvial flooding in the vicinity of the subject lands. It is noted that pluvial flooding can be overcome by appropriate surface water drainage.



Figure 8 – Extract of the OPW Draft Flood Mapping from [www.myplan.ie](http://www.myplan.ie)

The OPW Flood Hazard Mapping Website is a record of historic flood events. This database indicates that one property in the vicinity of the subject lands floods to door after heavy rain (refer to Figure 9).

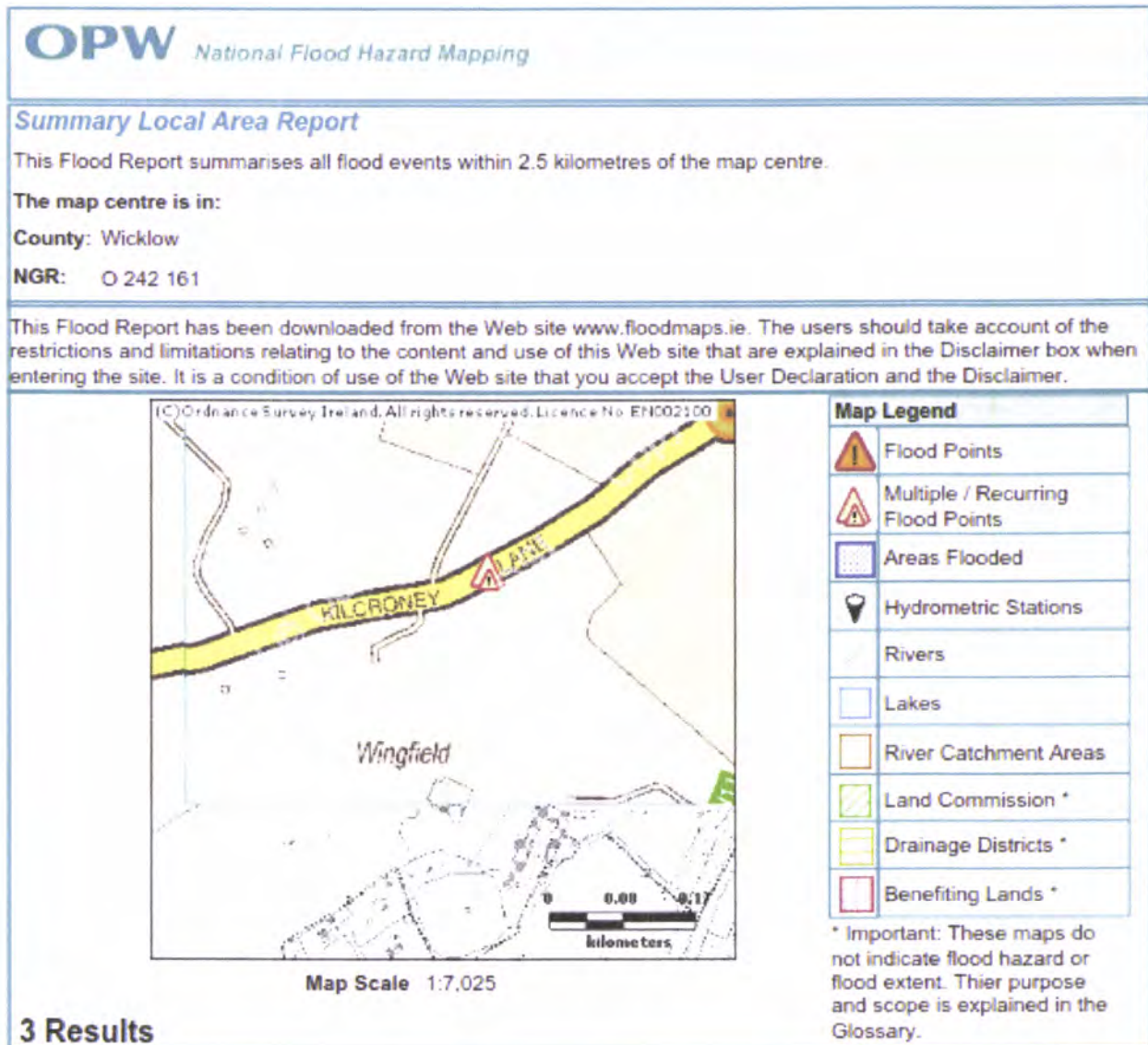


Figure 9 – Historic Flood Events at Kilcroney Lane ([www.floodmaps.ie](http://www.floodmaps.ie))

Although having potentially severe consequences, pluvial flooding can generally be managed through site design, layout and drainage.

The proposed Kilcroney Neighbourhood shall have a surface water drainage network designed to cater for storm waters from hardstanding areas in accordance with the Greater Dublin Strategic Drainage Study (GDSDS).

It is noted that in the case of the subject lands, the fluvial and the pluvial flooding aspects are interconnected; therefore the Flood Risk Assessment should address them holistically.

## Conclusion

This document should be read in conjunction with the main submission from Frank O'Gallachoir. This technical note considers the traffic implications associated with

- Extending the Bray boundary to include lands in the immediate vicinity of the Kilcronee interchange to provide for an integrated development of a new neighbourhood.
- To include a Specific Local Objective (SLO), to develop this land, as a new residential neighbourhood with mixed residential, commercial, educational, community and open space uses, with appropriate requirements, and appropriate densities.

Our assessment would indicate that the subject lands are well served by the local and national road network and we note that there are current proposals to provide enhanced capacity along the M11 to facilitate long distance journeys. We also note that a public transport structure is in place which could also be enhanced subject to increased demand from development lands.

With regard to service provision to the subject lands, we can conclude that the land can be serviced from a surface water, foul water and water supply point of view.



C256

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

15<sup>th</sup> September 2017

Dear Sir/Madam,

**RE: SUBMISSION ON THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017**

**1.0 INTRODUCTION**

- 1.1 On behalf of our client, RGRE J & R Valery's Limited, Treasury Building, Grand Canal Street Lower, Dublin 2, we wish to make a submission on the Draft Bray Municipal District Local Area Plan 2017. The submission relates to lands located at within the curtilage of St. Valery's, Fassaroe, Kilcrouney, Bray, Co. Wicklow.
- 1.2 This submission relates to lands within the curtilage of St. Valery's and bounded by the N11 to the east and the Enniskerry Road (R117) to the south. Our client supports the zoning resignation of the subject lands from hotel use in the Bray Environs Local Area Plan 2009-2017 to tourism as proposed within the Draft Bray Municipal District Local Area Plan 2017.
- 1.3 However, it is respectfully submitted that the extent of the hotel zoning as indicated in the County Plan be retained within proposed new tourism zoning in the Bray Municipal District Local Area Plan.

**2.0 SITE LOCATION AND DESCRIPTION**

- 2.1 The subject lands are located in the settlement boundary of Bray, as defined in the Draft LAP. The subject site is located off the N11 National Primary Route which connects Dublin southwards to Wexford. The N11 in the vicinity consists of a partially separated dual carriageway. Approximately 2 kilometres to the north, the N11 gives way to the M50 motorway, which is just north of the Fassaroe Interchange. Bray town is located approximately 4km south east of the subject lands and Enniskerry Village is approximately 3.5 kilometres to the west.
- 2.3 The site is bounded to the west and north by the Dargle River and the St. Valery's demesne beyond. The south eastern portion of the site is bounded by Council owned land containing the access steps and a pedestrian footbridge crossing the N11. The bridge provides pedestrian connectivity from the subject lands to lands

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI  
 Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MSERM MAT&CP Dip EIA Mgmt. MIPI

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west of Bray Town. North of this along the eastern boundary there is an existing berm rising some 7 metres above the remainder of the site which falls gently from the Enniskerry Road northward towards the River Dargle. The existing berm on the eastern boundary contains a number of mature trees. The remainder of the eastern boundary is formed by a 2m high blockwork wall running parallel to the N11 dual carriageway which is at a level approximately 2 metres higher than the site.



Figure 1: Aerial view of the subject site: Source: Google Maps



#### 4.0 GROUNDS OF SUBMISSION

- 4.1 This submission seeks amendments to the Draft Bray Municipal District LAP in relation to the zoning boundary of our client's lands for tourism use.
- 4.2 The Bray Environs Local Area Plan 2009-2017 which is the existing plan for the lands, designates the subject site as Hotel use. The Draft Bray Municipal District LAP re-designates the zoning of the subject site to Tourism. As part of the re-designation, the boundary of the tourism land use area has been marginally decreased and covers a lesser extend of our client's lands.

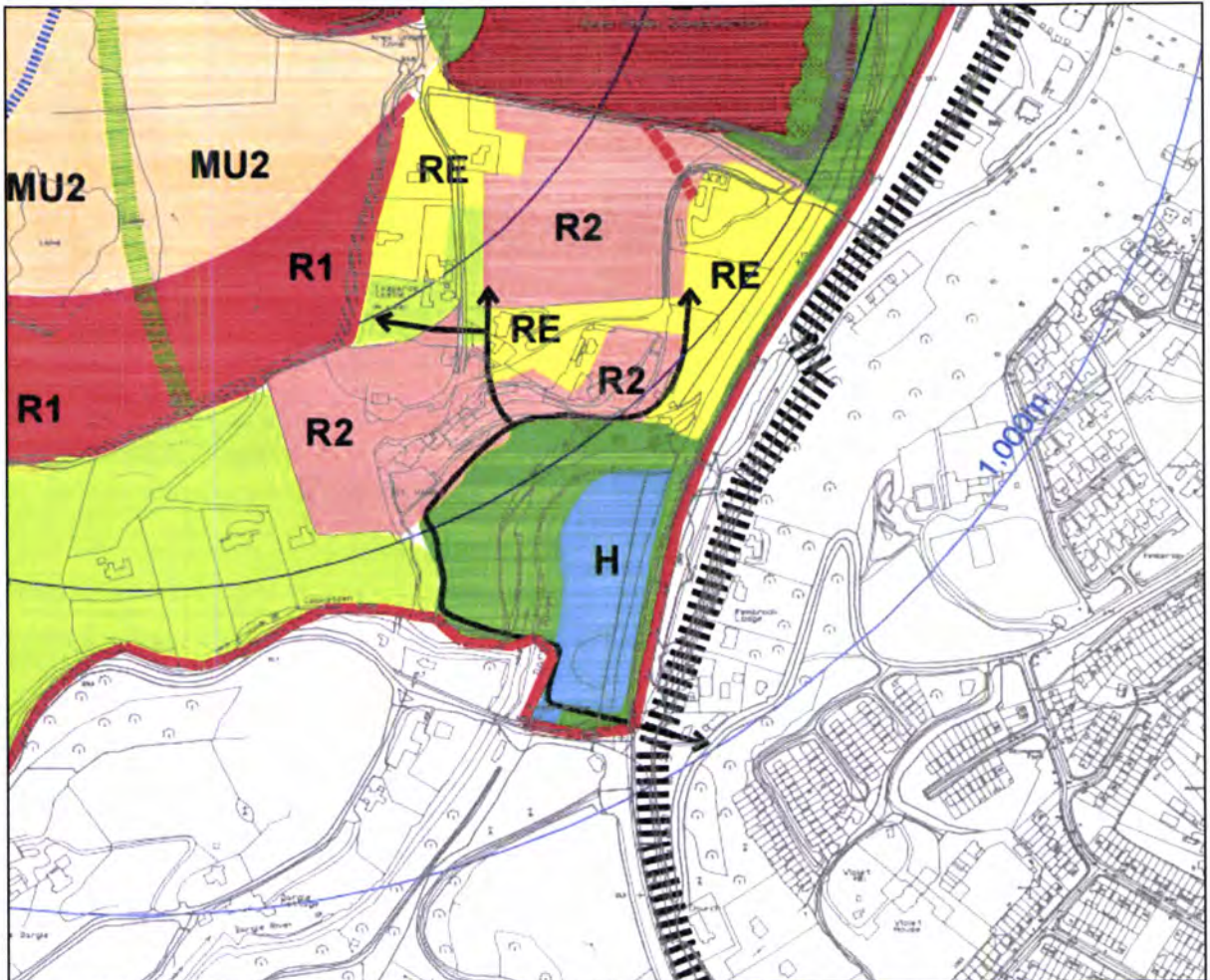
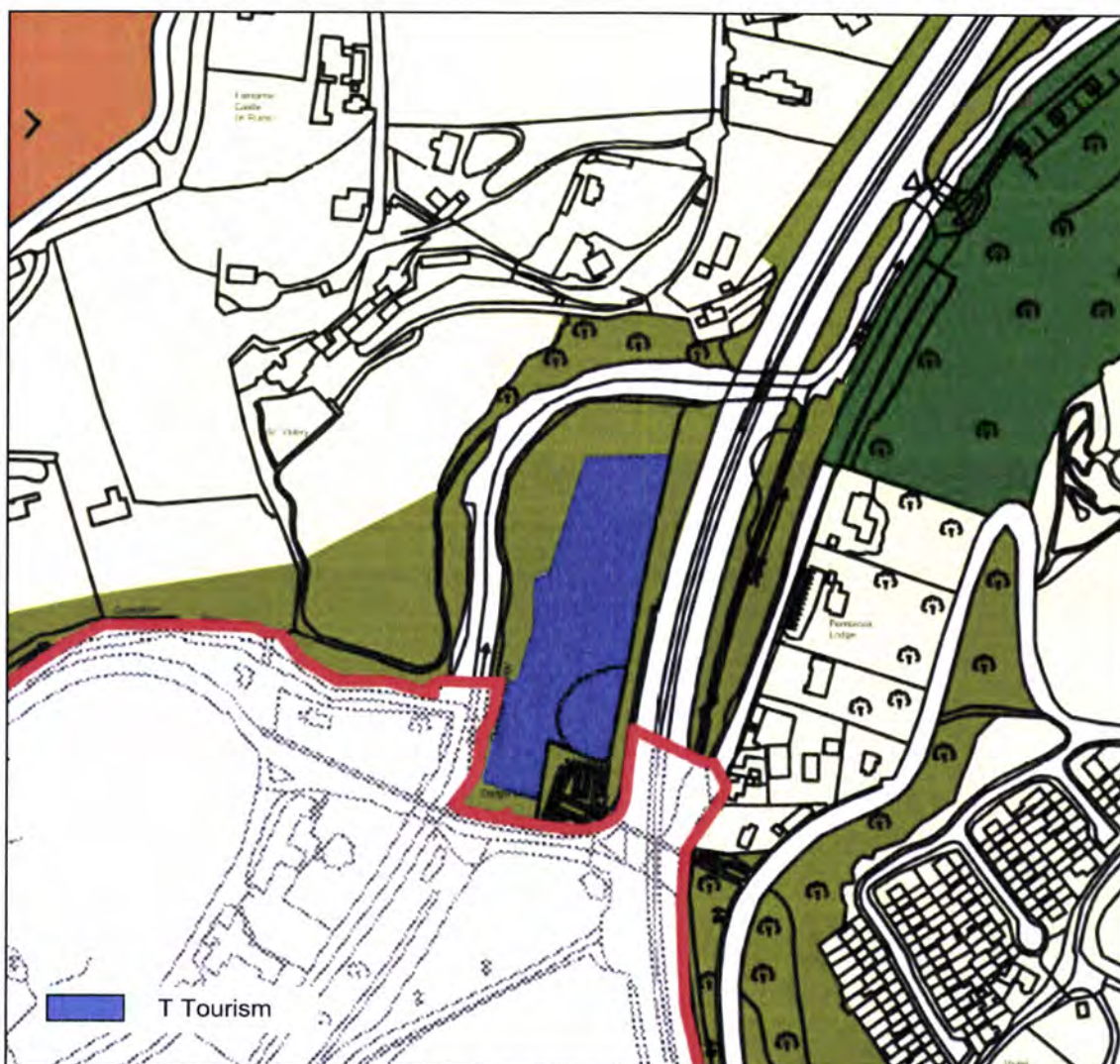


Figure 2: Extract from Bray Environs LAP 2009-2017 indicating the subject site within the H zoning designation





**Figure 3: Extract from the Bray Municipal District LAP 2017 indicating the proposed tourism use in blue**

- 4.3 It is clear from the zoning map extracts above that the extent of the proposed tourism zoning has been reduced marginally in comparison to the previous hotel zoning. The reduction in the boundary of the proposed zoning reduces the development potential on the lands and potentially hinders future tourism development due to the tight site constraints. The retention of the previous zoning extent will enable a more appropriate sized development on the site while at the same time respecting the River Dargle and the N11 buffer zone.
- 4.4 As such, it is respectfully requested that the extent of the land use boundary of the hotel zoning as indicated in the Bray Environs Local Area Plan 2009-2017 be retained within the proposed Tourism zoning in the Bray Municipal District Local Area Plan 2017.
- 4.5 In addition, it is respectfully submitted that rental residential accommodation for tourism and general occupancy should be included within the Tourism zoning description as indicated in Chapter 11, page 73 of Draft LAP having regard to the location of the site within the settlement boundary of Bray.

**5.0 CONCLUSIONS**

- 5.1 This submission is made on behalf of our client, RGRE J & R Valery's Limited, Treasury Building, Grand Canal Street Lower, Dublin 2.
- 5.2 This submission relates to the zoning boundary of the proposed Tourism zoning at the subject lands located within the curtilage of St. Valery's, Fassaroe, Kilcronee, Bray, Co. Wicklow.
- 5.3 It is respectfully requested that the extent of the zoning boundary be amended to reflect the previous hotel zoning as indicated in the Bray Environs Local Area Plan 2009-2017.
- 5.4 In addition, it is respectfully submitted that rental residential accommodation for tourism and general occupancy should be included within the Tourism zoning description as indicated in Chapter 11, page 73 of Draft LAP.
- 5.5 We would be grateful if our submission could be considered in the preparation of the plan.

Yours sincerely,

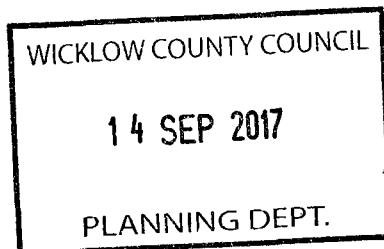


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**John Spain Associates**



Administrative Officer  
 Planning Section  
 Wicklow County Council  
 County Buildings  
 Wicklow Town  
 Co Wicklow



Drishcoora Cottage  
 Barchuillia Commons  
 Kilmacanoge, Bray  
 Co. Wicklow

tel:

14th September 2017

### Re Draft Bray Municipal District Local Area Plan 2017 - 2023

A chara,

Attached are comments/proposals concerning Kilmacanogue for consideration by Councillors when adopting the Bray Municipal District Local Area Plan 2017 – 2023:-

#### **1. Status of the Little Sugar Loaf**

In the *Wicklow County Development Plan 2016-2022*, the ‘Bray Mountains Group/Northern Hills’, comprising Bray Head, the Great Sugar Loaf and Little Sugar Loaf are classified together as “An Area of Outstanding Natural Beauty” (Chapter 10, Table 10.4 and Map 10.13b).

Thereafter, and carried over to the draft plan, the status of the three hills is treated inconsistently

- Schedule 10.6, ‘Proposed Natural Heritage Areas in County Wicklow’ includes Bray Head (no. 714) and Great Sugar Loaf (no. 1769), but Little Sugar Loaf is omitted. Little Sugar Loaf should be included in the Schedule, either in tandem with Great Sugar Loaf in no. 1769 or separately on its own
- Schedule 10.10, ‘County Geological Sites’ includes Bray Head (no. 2) and Great Sugar Loaf (no. 48), but Little Sugar Loaf is omitted. Little Sugar Loaf should be included in the Schedule, either in tandem with Great Sugar Loaf in no. 48 or separately on its own. The ‘Site Description’ and ‘Geological Feature’ statements for Great Sugar Loaf, respectively “*A prominent, scree covered, quartzite conical mountain peak*” and “*The steep upper slopes are blanketed with extensive patches of loose angular quartzite boulders*” apply equally to both Great and Little Sugar Loaf.

In addition, in Schedule 10.14 ‘Views of Special Amenity Value or Special Interest’, there is an omission. The view of the Little Sugar Loaf from the R755 Road in Kilmacanogue village looking eastwards, should be included in this Schedule.

#### **2. Growth and the settlement boundary**

Growth. However it may be viewed in theoretical planning terms, the physical and environmental *locale* of Kilmacanogue means that it cannot support growth indefinitely. At some stage planners will acknowledge that growth cannot be an end in itself in a location where a) there is limited or no suitable space and/or b) where growth destroys the very essence of the location.

At present there is space for some new housing in Kilmacanogue. But the sweeping general precepts in the draft plan that it ‘*is suitable for accommodating a significant element of urban*

generated housing demand' or that it '*.. has much [i.e. 'considerable'] potential in accommodating additional housing development catering for persons working in larger cities and towns ..*' (pp7) are patently not applicable to Kilmacanogue. Indeed, the specific statement that '*.. it shall be prioritized for moderate housing growth and shall absorb demand for new housing from inside and outside the County*' (R9 pp24) depends entirely on what is meant by 'moderate'! This needs to be clearly quantified with specific regard to the physical and environmental constraints at Kilmacanogue.

Kilmacanogue 'Settlement Boundary'. On the 'Land Use Zoning Map; Map no. 4', there are clusters of houses contiguous with, but outside the drawn 'settlement boundary', as shown on the attached copy; they all lie within 200 m, maybe 300 m, of the settlement boundary as drawn by planners. What criteria have been used to decide that these house clusters are classified as 'Rural' and not part of the Kilmacanogue settlement (pp 69)? Clearly their occupiers will consider themselves as living in Kilmacanogue. Their exclusion from 'Kilmacanogue' means that the principles that '*the key aim.. is to consolidate the town .. and develop housing on infill, rather than out of centre , sites*' cannot be applied effectively. The Kilmacanogue 'settlement boundary' needs to be given rational reconsideration.

Re-zoning. In the draft it is made clear that rezoning decisions should be based on local conditions justifying the same (pp 14). There does not appear to be any rationale set out in the draft plan for the new zoning proposed, with regard to either their location or their category.

Specifically, no rationale is given for the proposed ribbon developments on the east side of the N11. Reasons for their unsuitability include:-

- . the recognition in the draft plan that they are '*.. cut off from the [core]*' (pp 11), with the consequence that the draft plan is actively proposing housing development on green-field sites that are manifestly '*out of centre, sites*' (pp 11)
- . their spread along the eastern side of the N11 in a ribbon development in contradiction of the key aim '*.. to consolidate the town.*' (pp11)
- . their location on ground that rises sharply from the floor of the valley on the lower slopes of the Little Sugar Loaf and consequently their visual intrusion on this 'Area of Outstanding Natural Beauty' and their specific adverse impact on the 'View of Special Amenity/Special Interest' '*View of Little Sugar Loaf from N11 Kilmacanogue*' (Schedule 10.14, no. 39)
- . their location in the northern part along the Kilmacanogue river, when all rivers are to be kept '*free from inappropriate development*' (see GI3 pp 54).

Apart from the opportunity for extra infill housing if the Kilmacanogue settlement boundary was properly defined, there are potential locations for housing development apart from those proposed which would meet the principles set out in the draft plan; for example the area north-west of and immediately adjacent to the area proposed for rezoning, KM1 (see attached plat). Such alternative locations have not been considered or discussed in the draft plan.

There are clear principles set out in the draft plan to be applied when rezoning. These need to be honoured in careful and considered practical work, to define the Kilmacanogue settlement boundary and to identify appropriate areas for rezoning; and the rationale (pros and cons) for areas considered for rezoning need to be made available for public consultation.

### **3. The core area**

Kilmacanogue is '*spread out, with no real definition in terms of a .. core*' (DBMDLAP17 pp10). The draft plan has proposals for '*consolidating the town*' and promoting a core. However, there

is no recognition that the long-time core at the lower, eastern end of the R755 road serves as a traffic-run for vehicles passing through to join the N11 northbound. And given the nature of that junction, with a petrol station and bus terminus on the slip road giving access to the N11, there is serious congestion throughout the day, particularly in early morning, so, often, the core-area is a slowly moving car-park. Any plans to develop a '*.. consolidated and vibrant mixed use settlement centre ... that is the focal point [of the village] ..*' (pp17) is bound to fail unless the through run of traffic is stopped; this requires closing of direct access to the N11 through the core area and redirecting through-traffic to join the N11 away from the core area.

#### **4. Safe access to Bray for non-vehicular traffic**

Ever since the dual-carriageway with a central reservation barrier was built at Kilmacanogue, an effective stop was put on locals being able to walk (even to cycle) to Bray; at present walking or cycling to and from Bray is arduous, unpleasant, hazardous, even life threatening. There is a pressing need for a safe, vehicle-free access route from Kilmacanogue to Bray.

A principle set out in the plan (pp 19), as a priority, is '*To enhance pedestrian and cycling infrastructure within settlements and between settlements, .. including the development of green routes.*' This matter is not addressed specifically in the proposals for Kilmacanogue, but there is the germ of the idea there with the proposed R09 greenway along the Kilmacanogue river outside the settlement to the north (pp 47 and map T01). As a matter of top priority, the plan should include a greenway (defined specifically to exclude any form of motorized transport) between Kilmacanogue and Bray. This should run along the Kilmacanogue river, starting from the east side of the Kilmacanogue pedestrian overbridge, to the southern-cross road at Ballywaltrim, and, with the will and some imagination, this vehicle-free artery could be extended to Bray sea-front (see proposal GI 5 pp 54). Such a green-way would fulfill the principle of vehicle-free infrastructure between settlements (pp 19), the principle of 'Green Infrastructure (pp 53), the principle that *..a break must be maintained between the built-up areas of Bray and Kilmacanogue* (pp 9) and also the principle that rivers, including the Kilmacanogue river, be '*free from inappropriate development*' (see GI3 pp 54).

*Bealach Ó Chualann* (The Sugarloaf Way/Trail). Not only would the greenway provide Kilmacanogue residents with a safe and attractive facility for walking, jogging, cycling, horse riding etc, they would also have a safe, direct route to access the Dublin Bus service at Ballywaltrim direct to Dublin city centre, and also to access Bray centre should the greenway be extended there (see GI 5 pp54). Such a greenway would be an enhancement of '*Bealach Ó Chualann*' which currently runs from the Memorial garden in Kilmacanogue to the top of The Great Sugar Loaf (*Ó Chualann*). The greenway would make it possible for walkers/tourists to climb the Sugarloaf without use of a car, by getting a Dublin bus to Ballywaltrim or by getting the Dart to Bray. As a result, *Bealach Ó Chualann*, from Bray to the top of the Sugarloaf, would complement *Slighe Chualann*, the ancient road from Bray to Tara.

#### **5. A new road proposed east of the Kilmacanogue river**

In the draft plan it is proposed that a new road (a *cul-de-sac*) should be built east of the Kilmacanogue river on the lower slopes of the Little Sugar Loaf (R08 pp 47) '*.. to serve properties that currently are accessed only via the N11*'. This is not a valid reason for putting a new road at this location as it has been considered in great detail in the 'M11/N11 Corridor Study, Needs Assessment Report' of April 2017 commissioned by Transport Infrastructure Ireland (TII) in which it is concluded that it offers '*Limited benefit to the operation of the N11 via reduced flows and [is] considered superfluous with mainline and junction improvements between Junctions 7 and 8*' (TII Report, pp51)

## **6. Safety audit on two Kilmacanogue petrol stations**

There are two petrol stations in Kilmacanogue, one on each side of the N11. They are legacy features from before development of the N11 dual carriageway, when they were simple, paired petrol pumps set well back from the road. They have been allowed to develop into large filling stations providing (expensive) fuel from multiple pumps, fast food and alcohol, serving as pit-stops for travelers on the N11. Their location on the actual slip roads providing access to the N11 (west side) and from the N11 (east side) is a serious, even life-threatening hazard for all users of the N11 at Kilmacanogue, not only those in vehicles but also cyclists and pedestrians. This has been known to planners and Councillors for many years. There is an urgent need for a full safety audit of the location of these petrol stations on the slip roads, and this should be included in the LAP. In circumstances where their locations are found not to be compliant with relevant safety standards/regulations then the petrol stations should be required to move to locations along the N11 to the south or north where they will be compliant.

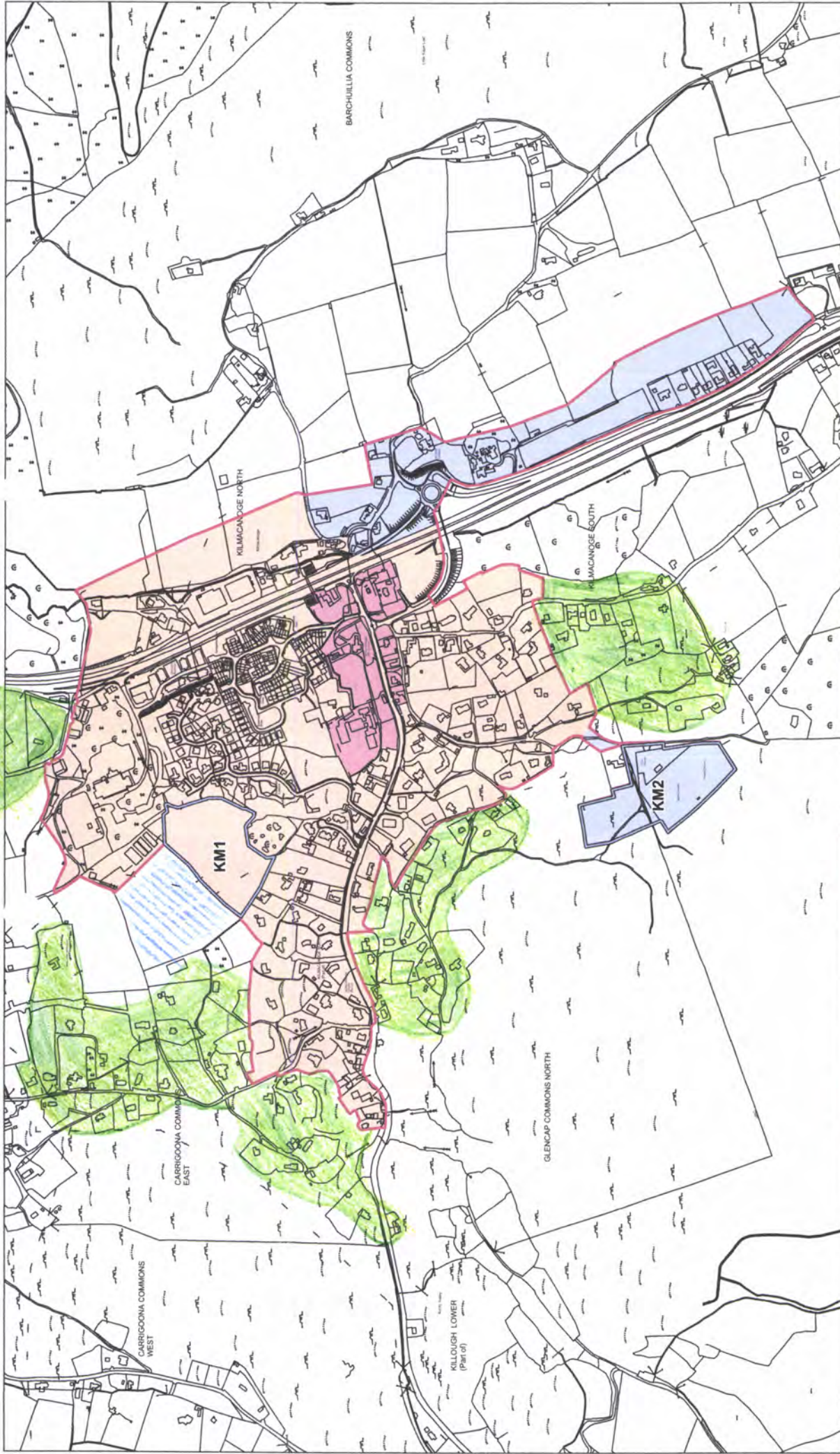
We request that this submission be fully presented to all Councillors so that the points may be taken fully into account when the decision on the draft plan is taken.

Is muidle le meas,

Handwritten signatures of Keith and Maeve Robinson in cursive script.

Keith and Maeve Robinson





- Primary Development Area
- Secondary Development Area
- Tertiary Development Area
- Plan Objectives Boundary

- Municipal District Boundary
- Settlement Boundary

WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District**  
Local Area Plan  
2017

LAND USE ZONING MAP **DRAFT**

Title: Kilmacanogue  
Map No. : 4

**PLAT**  
**COPY MAP NO. 4**

**KILMACANOUGE HOUSE CLUSTERS**  
**OUTSIDE "SETTLEMENT BOUNDARY"**  
**AREA SUITABLE FOR REZONING**



Wicklow County Council  
Planning Department  
Maps are not to scale

Ordnance Survey Licence: All rights reserved.  
Product Number: 201725/CCMA/Wicklow County Council

**KMR 14/9/17**



**Leonora Earls**

---

**From:** Nicholas Robinson [mailto:nicholas@kilmacanogue.ie]  
**Sent:** 14 September 2017 21:29  
**To:** Planning - Plan Review; 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; 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; Cllr. Edward Timmins MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Miriam Murphy; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley  
**Subject:** re: Wicklow County Development Plan 2016-2022, and the Bray/ Kilmacanogue Local Area Plan 2017-2023

I am writing on behalf of the household of Glencapple, Glencap Commons North, Kilmacanogue, Co. Wicklow A98 YT10

We object to the proposed roadway and re-zoning of lands on the lower slopes of Little Sugar in Kilmacanogue because:

- 1) We feel that this proposal will lead to the amalgamation of Kilmacanogue with Bray. The proposed road and inevitable housing and commercial development will effectively end Kilmacanogue as a separate entity from Bray in the years to come.
- 2) It will not solve the issue with the traffic on the N11. The Transport Infrastructure Ireland report correctly describes the proposed road as "superfluous".
- 3) It will not alleviate the danger the Topaz garage on the east side of Kilmacanogue presents. Only a complete relocation of this garage to a safe area can do that.
- 4) It will damage an area of outstanding natural beauty as well as the environment of the locality. Also mentioned in the Transport Infrastructure Ireland report.
- 5) Following the closure of our local Post Office and the removal of the 145 bus service, we feel that this represents yet another change for the locality which does not take into account the needs and wishes of the majority of the people of Kilmacanogue.

For these reasons we believe the proposal must be removed from the Wicklow County Development Plan 2016-2022 and the Bray/ Kilmacanogue Local Area Plan 2017-2023. Lastly, we would urge Wicklow county council to follow through with the 2008 ministerial decree to create a Special Amenity Area Order for the Little and Great Sugar Loaf mountains.

Nicholas Robinson  
 Kilmacanogue resident since 1974 with third generation Kilmacanogue children



C259a

**Bernadette Harvey**

---

**From:** Pat Robinson  
**Sent:** 14 September 2017 09:24  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews  
**Subject:** Fwd: Re the Draft Bray Municipal District Local Area Plan 2017

Hi Sorcha,

Further to by email below.

I will be in Wicklow this morning and was wondering if I could have access to the written submissions in respect of the plot of land in question. I can be at your offices at 11 am. Please confirm this is ok.

I am still awaiting responses to the other queries in my email.

Thanks,  
Pat

----- Forwarded message -----

**From:** Pat Robinson <pat@wicklowcoco.ie>  
**Date:** 12 September 2017 at 13:08  
**Subject:** Re the Draft Bray Municipal District Local Area Plan 2017  
**To:** [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)  
**Cc:** Steven Matthews <steven@wicklowcoco.ie>

Hi Sorcha,

Thanks for getting back to me. Further to your email.

The area of land in question is not part of the green open space for this estate nor is it dedicated solely for the use of the residents of Glencourt.

This is in fact private land ( as far as I am aware owned by the Holfield family). I understand that other Holfield land (Oldcourt House and the Oldcourt Castle land) have been proposed to be rezoned from OS4 to R20: New Residential (coloured coded Yellow). Why is this portion of land at Glencourt Estate, which fits the same criteria being treated differently given that it was OS4 and similar type land, apart from being a greater scale.

I would have thought that in the interest of clarity and to make the Bray Plan user friendly all land that has been proposed to be rezoned should be clearly visible. What other land is proposed to be rezoned in this manner?

As regards work being done on the area in question, this is private land (although clearly designated OS4). As such unless informed neither Wicklow County Councils Planning Department or the Municipal District office in Bray would be aware of any work. Perhaps there is a Planning Enforcement issue here as work has been done on land currently zoned OS4?

I will make a formal submission and will include our emails as part of it.

Please supply me under the Freedom of Information Act the reasons why Wicklow County County concluded to propose this area of land to be rezoned. I requested the reasoning in my previous email.

I would like to inspect and copy the written submissions in respect of the area in question. What time would they be available to view? Do I have to make an appointment and who should I meet?

Many thanks,  
Pat

## **Bernadette Harvey**

---

**From:** Pat Robinson [mailto:pat@robinson.ie]  
**Sent:** 12 September 2017 15:09  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews  
**Subject:** Re the Draft Bray Municipal District Local Area Plan 2017

Hi Sorcha,

Thanks for getting back to me. Further to your email.

The area of land in question is not part of the green open space for this estate nor is it dedicated solely for the use of the residents of Glencourt.

This is in fact private land (as far as I am aware owned by the Holfield family). I understand that other Holfield land (Oldcourt House and the Oldcourt Castle land) have been proposed to be rezoned from OS4 to R20: New Residential (coloured coded Yellow). Why is this portion of land at Glencourt Estate, which fits the same criteria being treated differently given that it was OS4 and similar type land, apart from being a greater scale.

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I would like to inspect and copy the written submissions in respect of the area in question. What time would they be available to view? Do I have to make an appointment and who should I meet?

Many thanks,  
Pat



## Sorcha Walsh

---

**From:** Sorcha Walsh  
**Sent:** 11 September 2017 12:35  
**To:** 'Pat Robinson'  
**Cc:** Leonora Earls  
**Subject:** RE: BRAY MD LAP

Dear Pat,

Thank you for your emails.

I wish to advise that no 'error' has been made, the zonings in questions are indeed proposed for alteration. The lands are not proposed to be zoned 'new residential' but rather 'existing residential'.

In this regard, I wish to advise you that the zoning protocols / codes utilised by Wicklow County Council differ from those used by the former Bray Town Council in that WCC identifies lands that form the open space of a permitted residential development as 'RE – existing residential' rather than 'OS' as they form an intrinsic part of the residential development. The County Development Plan provides that *'In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Non-community uses on such lands will not normally be permitted (Objective CD44)*

It is of course open to you to make a submission against this proposed change if you so wish, or alternatively, we can take your 2 emails together as a 'submission' if you would like?

With respect to submissions, we do not take 'verbal' submission, only written, and all of these are available for inspection in the offices of Wicklow County Council. Please however be advised that changes in zoning do not only come about via submissions / representations, but also via the normal plan crafting process carried out by the forward planning team, in accordance with guidelines set out by the Minister.

With regard to landscaping activity in the area, the planning department would have no knowledge of such works, but perhaps you might inquire with the Municipal District Engineers office in Bray?

Is mise le meas,

Sorcha Walsh

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**From:** Pat Robinson [<mailto:patrobinson.bray@googlemail.com>]  
**Sent:** 08 September 2017 15:50  
**To:** Planning - Plan Review; Cllr. Steven Matthews  
**Subject:** Fwd: BRAY MD LAP

Hi Sorcha,

Further to my email below I am now sending you more detailed maps of the area I referred to in my previous email.

Revised map 1 - Proposed Development Plan

Revised Map 2 - Current Development Plan

From this you can clearly see the land area has been rezoned.

Regards

Pat

----- Forwarded message -----

From: **Pat Robinson** <patrobinson.bray@googlemail.com>

Date: 8 September 2017 at 10:51

Subject: BRAY MD LAP

To: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

To whom it may concern

## **Re the Draft Bray Municipal District Local Area Plan 2017**

I believe there is an error in the above draft plan. An area stretching from between number 23 and number 11 Glencourt Estate (see attached map 1) to the boundary wall with Giltspur Wood extending into Giltspur has been changed to be existing residential. This area is zoned OS4 in the current development plan (see map 2). OS4 is defined as Solely Open Space. If there has been a change in zoning should it not be colour coded as being new residential?

Could you please outline the reasons why this area has been rezoned? Also please supply me under The Freedom of Information Act with any submissions to the Council both verbal and written from third parties in respect of the above rezoning.

There is a significant amount of activity in the area of the rezoned land in the past twelve months

- Mature trees in Giltspur Wood overlooking the area have been cut back and topped.
- Work has commenced on clearing the area. Trees and shrubs cut down and removed.
- Mature trees in the area have been cut down and removed.
- The landscape at the front of the area at the end of the road at Glencourt Estate has been altered.

Are you aware of any reason for these activities?

Many thanks in advance.

My contact details are

Pat Robinson

## Bernadette Harvey

---

**From:** Pat Robinson  
**Sent:** 08 September 2017 15:50  
**To:** Planning - Plan Review; Cllr. Steven Matthews  
**Subject:** Fwd: BRAY MD LAP  
**Attachments:** Map 1.png; Map 2.png; Revised Map 1.jpg; Revised Map 2.jpg

[REDACTED]

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My contact details are

Pat Robinson

23 Glencourt Estate,

Killarney Road.

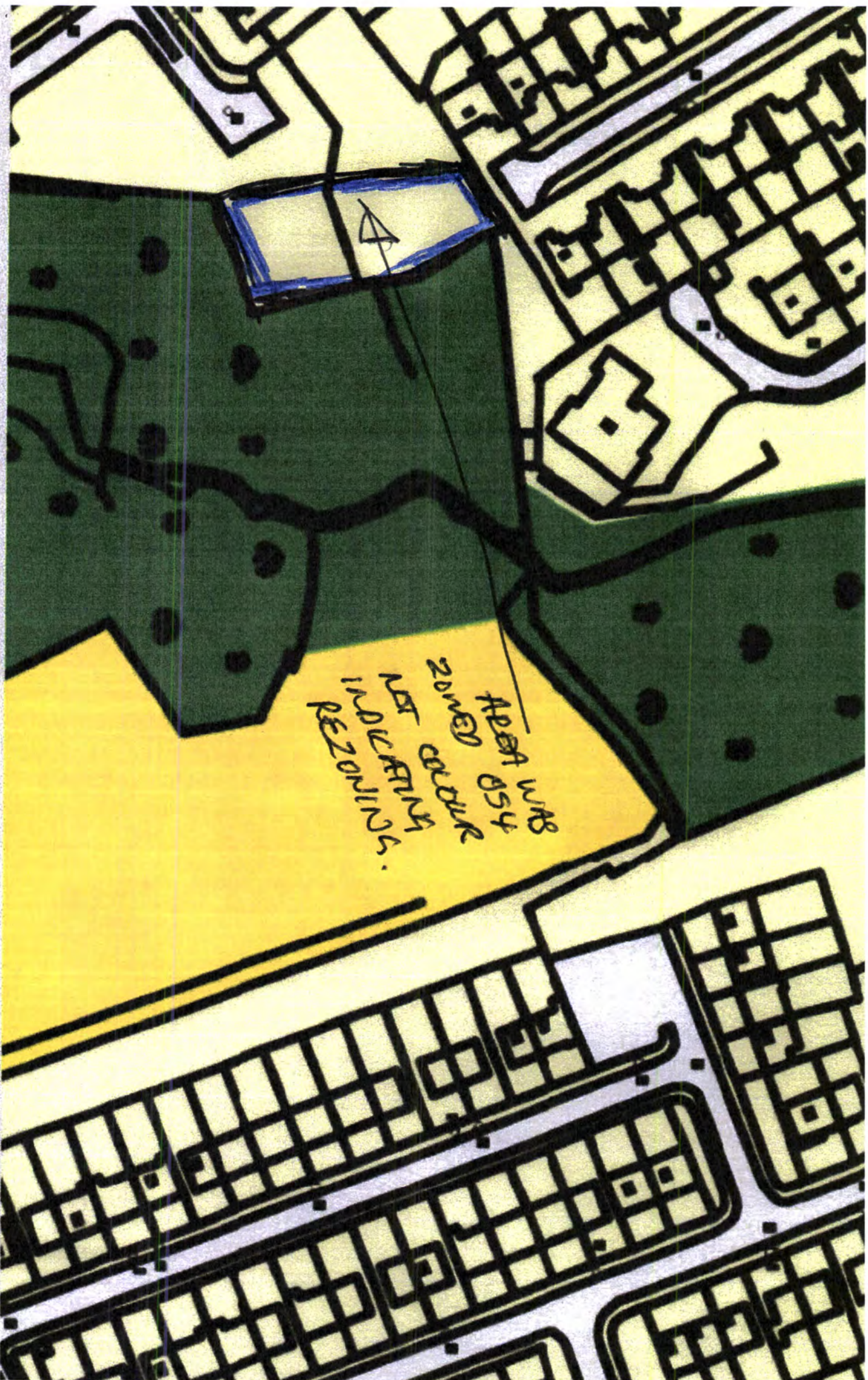
Bray.

My email address is as per this email.

Please confirm receipt of this email.

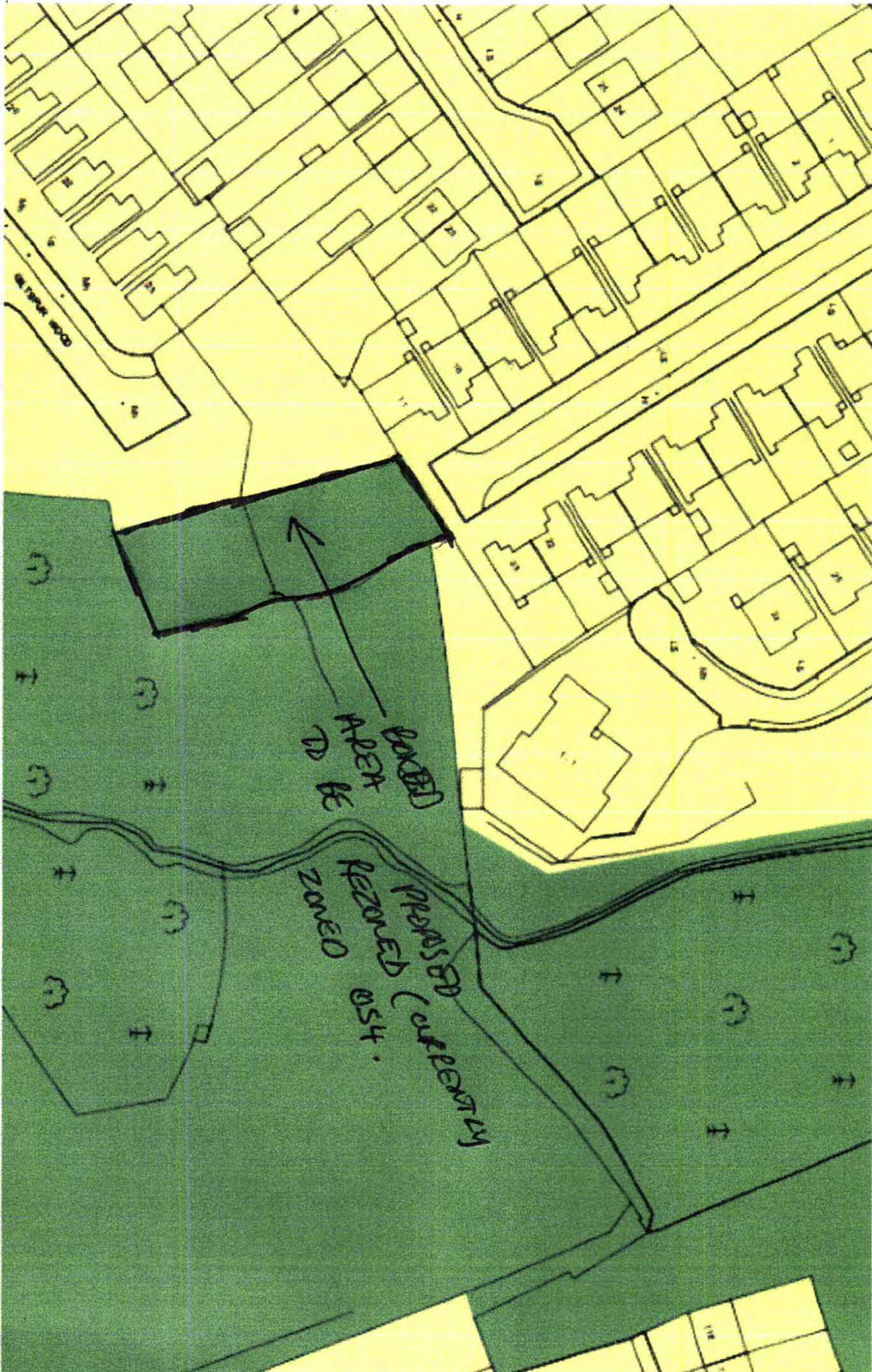
Regards





AREA WAS  
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NOT INDICATED  
RE ZONING.





PROPOSED  
AREA  
RD BE

PROPOSED  
REZONED  
OS4  
CONCRETE

ALTAIR RD





**Bernadette Harvey**

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**Sent:** 08 September 2017 10:51  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP  
**Attachments:** Map 1.png; Map 2.png

To whom it may concern

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Pat Robinson

23 Glencourt Estate,

Killarney Road.

Bray.

My email address is as per this email.

Please confirm receipt of this email.

Regards











C2598

**Leonora Earls**

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**From:** Julieanne Prendiville  
**Sent:** 13 September 2017 11:06  
**To:** Planning - Plan Review  
**Cc:** Pat Robinson  
**Subject:** Draft Local Area Plan Public Consultation  
**Attachments:** Bray LAP.pdf

Dear Sir/Madam,

Please find enclosed a submission in relation to the draft local area plan public consultation phase of the Bray plan.

Regards,  
Julieanne Prendiville

Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town

Prendiville Planning  
10 Loretto Terrace  
Bray  
Co. Wicklow  
Tel: 4

Email: 01  
01

13th September 2017

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

Dear Sir/Madam,

Prendiville Planning, 10 Loretto Terrace, Bray, Co. Wicklow on behalf of our client, Patrick Robinson of 23 Glencourt, Killarney Road, Bray, Co. Wicklow, wish to lodge this submission in relation to the public consultation phase of the Draft Bray Municipal District Local Area Plan.

Please find enclosed a submission document which outlines the issues and concerns of Patrick Robinson. The submission is being made within the timeframe for submissions (15th September 2017) as detailed in the public notice.

We would respectfully request that you would give due consideration to the matters raised.

If you have any queries or require any further copies, please do not hesitate to contact me.

Yours faithfully,

Julianne Prendiville MRTPI



**DRAFT LOCAL AREA PLAN SUBMISSION**



**Draft Bray Municipal District  
Local Area Plan**

*On behalf of: Patrick Robinson*



## 1. Introduction

Prendiville Planning, 10 Loretto Avenue, Bray, Co. Wicklow on behalf of our client, Patrick Robinson, wish to make this submission on the Draft Bray Municipal District Local Area Plan 2017 to Wicklow County Council. This written submission is made in response to an invitation for comments from interested parties by Wicklow County Council. This submission is being made within the specified timeframe for submissions i.e. 15<sup>th</sup> September 2017, as set out on Wicklow County Council's website.

## 2. Site Location and Description

The subject lands are located to the south of Glencourt; a small housing estate located off the Killarney road. Please see the relevant area outlined in red below. This land forms part of a green corridor which extends from Giltspur Brook to Rycroft. This corridor contains a number of important trees, and the Swan River. The green corridor also forms an attractive setting that is rich in flora and fauna.



Fig 1- Site Location, with subject lands outlined in red, as shown in the Draft Bray Municipal District Local Area Plan 2017



### 3. Planning History

Prendiville Planning have carried out an examination of the planning history pertaining to the subject land, and there are no recent planning applications pertaining to this site.

### 4. Principal of Submission

This planning submission proposes to object to the change in zoning of the subject lands (as identified in Figs 1 (above) and 2 (below)) from "OS4" Solely Open Space (it's current land use zoning) to "RE" — Existing Residential in the Draft Bray Municipal District Local Area Plan 2017.



**Fig 2- Site Location, with subject lands outlined in red as show in the Bray Town Development Plan 2011 - 2017**



#### **4.1 Proposed Development**

Under the Bray Town Plan 2011-2017, the objective of zoning “OS4” is “To preserve continuous open space along the river valley”.

In relation to OS4, Policy 9.4.5.4 of the current plan says “It is the policy of the Council to preserve continuous open space along the Swan River Valley ensuring no negative impacts on the natural environment of the area. This zoning provides for the preservation of the open space along the river valley as well as the preservation of trees, consistent with maintaining the flood capacity of the stream.”

Acceptable uses for this zoning as outlined in the plan are:

- Permitted in Principle: Cemetery, Open Space
- Not Normally Permitted but Open for Consideration: Car Park, Church, Commercial Recreational Buildings, Community Facility, Cultural use, Education, Private Club, Private Garage, Recreational Facility/Sports Club

As noted before, the Draft Bray Municipal District Local Area Plan has zoned these lands “RE” — Existing Residential. The objective of this zoning is “To protect, provide and improve residential amenities of existing residential areas”.

And the vision is “To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity.

In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned ‘RE’ as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.”

## **4.2 Relevant Frameworks, Guidance, Plans and Policy**

The draft Bray Municipal District Local Area Plan 2017 has been prepared pursuant to Section 20 of the Planning & Development Act 2000 as amended.

Of particular importance and relevance in the development of the Draft Bray Municipal District Local Area Plan is the Wicklow County Development Plan 2016 – 2022.

## **4.3 Issues for Consideration**

### **Principal of Zoning**

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

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

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

The change of zoning from open space to residential is clearly in conflict with this.

### **Loss of Open Space**

The draft plan goes onto note “Of key importance in the crafting of this plan was recognition of the **shortfall in active open space**” and “**a priority concern in the Bray MD is the provision of adequate Open space**”... “**CD4 The redevelopment for alternative uses of open space and recreational lands** whether owned by private recreational clubs or publicly owned, **will normally be resisted by the Planning Authority** unless suitable and improved alternative recreational facilities can be provided in a convenient location.”

In this case, no other alternatives appear to be proposed.

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

### **Promotion of the Green Corridor**

Objective GI5 of the new plan seeks “**To promote the development of a series of major open spaces and recreational areas linked by green corridors where feasible**” (See map GI1)

In addition, objective RO9 says it will “**promote and support the development of enhanced or new greenways** at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links... (including) **Bray - Swan River Kilruddery to Dargle River**”.

The reduction of open space to the south of Glencourt, which forms part of this greenway, is again in clear conflict with these objectives.

### **Protected View**

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



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

One of the listed protected views within the draft plan is the Swan River. Specifically “Schedule 10.14 (b) Protected Views and Prospects, 4. The view both up and downstream of the Swan River Valley, from both sides of the bridge on the Killarney Road.”

If this view is altered, then its importance and value naturally diminishes.

Whilst it may be argued (erroneously in my view) that “RE”- Existing Residential allows for open space, the protection afforded under “OS4” (or similarly “OS1” in the draft plan) is much greater.

#### **Loss of Habitat and Wildlife**

An area’s habitat and wildlife is vitally important to its residents health and wellbeing. Whilst the current plan contains many references to habitat and wildlife, the draft plan’s policy references to this are much sparser. Regardless, the draft plan (objective B4) does say it will seek “To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows ... other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network in Wicklow.”

The Swan River Valley acts as an important habitat and wildlife corridor in Bray and supports many different species of flora and fauna. Any reduction of this space, should be strongly resisted in accordance with objective B4.

### **Protected Trees**

The current Wicklow County Development Plan contains a specific objective on the preservation of trees. Objective NH14 says it will “ 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.”

Under Schedule 10.08 Existing Tree Preservation Orders - Bray Municipal District wide, the area between Oldcourt House and Vevay House, Swan River Valley is listed as having a tree preservation order.

Any change in status of the area from “OS4” to “RE” arguably puts more pressure on this area and Tree Preservation Order listing, by virtue of the greater emphasis on residential development permitted under “RE”.

### **5. Conclusion**

To conclude, the proposed rezoning of the aforementioned lands from “OS4” to “RE”-Existing Residential is in clear conflict to many of the current and draft plans policies and objectives.

The area in question is lush and green. It contains a rich amount of trees, habitats, flora and fauna, and forms an intrinsic part of the Swan River Valley.

The area has been designated a greenway, which the Council says it seeks to promote and support the development of.

By reducing the amount of space associated with the greenway, the Council is going against its own written plan.

## PRENDIVILLE PLANNING

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Greenways play not just an important role for the town's residents but also those visiting the area . They are an attractive and desirable feature not just to have but to maintain and extend as can be seen in the success of greenways in other localities.

The change in zoning from "OS4" to "RE"-Existing Residential arguably puts more pressure on the area in terms of development, in particular residential development.

Whilst open space is referenced in the zoning "RE"- Existing Residential, given the above likely pressures, it is proposed a more appropriate zoning for the land in question would be "OS1", in unison with the land immediately adjoining it to the south (i.e. the greenway of which it forms a part of).

For these reasons, the Councils is respectfully asked to amend this proposed zoning from "OS4"to "OS1".



**Leonora Earls**

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**From:** Ron R [.  
**Sent:** 06 September 2017 21:27  
**To:** Planning - Plan Review  
**Subject:** Rezoning of areas in Kilruddery Estate as part of the Bray Local Area Plan

Re: Rezoning of areas in Kilruddery Estate as part of the Bray Local Area Plan

To whom it concerns,

With regards to the rezoning of part of the Kilruddery Estate for housing (new residential) and commercial (special employment) use, as part of the Bray Local Area Plan, we the undersigned would like to express our opposition to such rezoning. We are all residents of the Hollybrook Park estate which adjoins the Kilruddery Estate.

Our objection is based on a number of grounds, as follows –

1. Access – It is unclear as to how the proposed areas for zoning would be accessed, will it be through existing roads and estates or newly developed roads. It does not appear that the infrastructure currently exists to provide for new builds.
2. Traffic – Current levels of traffic on the Southern Cross Road are heavy during rush hours. The traffic levels have increased noticeably during the last few years and it can sometimes take a number of minutes to get out of Hollybrook Park and onto the Southern Cross Road (S.C.R.). Adding another 240 houses and a commercial area, especially if access is through existing estates, will increase the volume of traffic within the estates and on the Southern Cross Road itself. This will increase the time needed to gain access to the S.C.R. and the congestion on the road.
3. Facilities – We believe that there are not adequate facilities/amenities on the Southern Cross Road to cater for people currently living in the estates on the road and further housing should not be added before facilities are provided. There are no shops nearby, a less than adequate bus service, no playgrounds/play areas for children, no litter bins on the Southern Cross Road etc. etc.
4. There is a concern that the current flood plain and drainage of the estate may be adversely affected by the addition of new buildings near the Little Sugarloaf which will increase the likelihood and severity of flooding. This would need to be addressed before permission for new buildings was to be granted.
5. We are also unsure as to why there is a need for further zoning for commercial/ special employment areas directly behind housing estates when there are at least three substantial buildings lying idle on the Boghall Road, including DELL, Schering Plough and A.O. Smith

Based on the above we would object to the rezoning proposals regarding Kilruddery Estate and the Southern Cross Road currently contained in the draft Bray Local Area Plan.

Signed:

Ron Roche and Michele Roche, 7 Hollybrook Park

Shane Blount and Niamh McHugh, 6 Hollybrook Park

Phil Owen and Maeve Owen, 8 Hollybrook Park

Paul O'Neill, 9 Hollybrook Park  
September 2017

6<sup>th</sup>

**Leonora Earls**

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**From:** michelle rogers [mailto:michelle.rogers@wco.ie] ]  
**Sent:** 15 September 2017 16:47  
**To:** Planning - Plan Review  
**Subject:** Submission on Bray Local Area Plan  
**Attachments:** LAPS-submission.rtf

Attached is my submission. Also pasted in below.

Submission to BrayLocal Area Plan

by Michelle Rogers

1 Vale Terrace Bray, Co. Wicklow

ousing

Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield

and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.

am completely opposed to the suggested development at the foot of the Little Sugarloaf.

An SSAO needs to be created to protect the Great and Little Sugarloaf. These are areas of outstanding beauty and must be protected from housing and roads being built anywhere near them.

I am opposed to housing on Rehill's land - this is the bank of our lovely river Dargle and should be made into a recreational area or planted with more trees. We have such few recreational areas in Bray. There is plenty of other land for housing.

Bray Harbour is an area of huge heritage value - it should be preserved as it is as much as possible and there should be no major building project here. If there are to be any buildings built on the side where there are now currently some warehouses, this must be done with the utmost sensitivity and should be low rise and not have a big visual impact on this beautiful old harbour - perhaps a few restaurant spaces with housing



only at the back with no visual intrusion on the harbour. The harbour is also, perhaps first and foremost, an important nature preserve for birds and it should be protected as such. Nothing should be done that will disturb that environment for the birds who call this their home.

It is vital that recreation space be preserved in the town - there is not enough of it as it is - it absolutely should not be built on - we need MORE recreation spaces.

Housing should be concentrated on the site at Fassaroe, west of the N11.

Please ensure that the golf club lands is in form of a linear park alongside the flood defence wall to offer some attenuation in the event of overtopping.

Please provide for co-housing or co-operative housing initiatives. We need affordable housing. Every new development must be required to have social and affordable housing in the mix.

Please prioritise land for community gardens and spaces where people can grow their own food.

## Roads and transportation

The LUAS must go to Bray Town Centre, not the new to-be-developed site at Fassaroe, west of the N11. The decision must NOT be made on the influence of any developer to part-fund a LUAS station!

Safe cycling and walking for our children and all of us must be prioritised. We need safe, separated cycle lanes.

A greenway type cycle and walking track that links Bray to Dublin and to the rest of Wicklow should be prioritised - this kind of development has brought huge tourism to many other areas of the country.

It is unrealistic that a town like Bray can continue to accommodate an ever-increasing number of cars, without having to ruin our unique and precious architectural heritage. It must be made easier for people to get into the town centre without driving. Shuttle buses would be a good idea.

## Heritage

It is critical that we protect and preserve our architectural heritage. In terms of future development of Bray as a good place to live and a good place to visit, destroying our architectural heritage is killing the goose that laid the golden egg.

Please take steps to preserve the unique character of our Main Street in Bray and surrounding streets of beautiful old buildings. It is a scandal that the huge ugly block of flats and shop units was built up the top of the town near McDonald's, destroying the character of a Victorian Main Street that had up until then remained pretty much unchanged for over 100 years. A lesson is that those depressing shop spaces cannot be filled and lie vacant. Please preserve the view, the architectural heritage of our Main Street, town centre and esplanade. This should be a major concern when planning is sought to demolish ANY old building in the town.

Preserve beautiful spaces like the People's Park - a lovely old Victorian park. Please preserve the view looking from the new park entrance by the boardwalk up to the mountains - it is beautiful sweeping parkland running along the river, with lovely old houses at the top of the park and a beautiful backdrop of mountains. This view should be preserved and protected.

Please protect all the old trees in the People's Park and around the town from either being cut down or from being brutally pruned so as to ruin their shape - as has happened in the town. There must be a process whereby residents are informed of the council's plans to cut down trees so that we have a chance to object. There have been some beautiful old trees cut down with no consultation. We treasure those trees as part of OUR natural heritage.

Please preserve the esplanade and harbour as unique areas of architectural importance. Greystones is a terrible lesson on what can happen when we have developer-led planning that ends up ruining architectural heritage. The harbour must NOT be developed - there is no need for it.

Please preserve the harbour as a wildlife reserve. Please make it into an official wildlife reserve. Any work should take into account the fact that it is a precious reserve for so many beautiful wild birds and they should be protected from disturbance of their habitat. This means no development and no harsh lighting to be installed. They live there.

Please prioritise making the town's open spaces friendly to wildlife - in terms of planting and leaving some areas wild. We have lost so much of our biodiversity in recent decades and the preservation of environments for our wildlife is a top priority for me.

Please allow for community gardens in the town and spaces for people to grow their own food when planning new housing.

--

Michelle Rogers  
1 Vale Terrace  
Bray  
Co. Wicklow



Submission to Bray Local Area Plan  
by Michelle Rogers  
1 Vale Terrace Bray, Co. Wicklow

## Housing

Wicklow County Council should be seeking to contain urban sprawl and not contributing to it. We need to rejuvenate what were previously manufacturing and industrial areas situated on the Boghall Road which have been in decline over the past twenty years. Also we need to rejuvenate sites like Dell, AO Smith, Schering Plough and Superquinn, Florentine town centre site, Heiton Buckley Site amongst others that are in dire need of redevelopment and regeneration which in turn could create local employment. These brownfield and derelict sites should be prioritised first and progressed for redevelopment including infill, high-density development and LOS (living over shop) objectives before zoning or development of any greenfield sites.

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It is critical that we protect and preserve our architectural heritage. In terms of future development of Bray as a good place to live and a good place to visit, destroying our architectural heritage is killing the goose that laid the golden egg.

Please take steps to preserve the unique character of our Main Street in Bray and surrounding streets of beautiful old buildings. It is a scandal that the huge ugly block of flats and shop units was built up the top of the town near McDonald's, destroying the character of a Victorian Main Street that had up until then remained pretty much unchanged for over 100 years. A lesson is that those depressing shop spaces cannot be filled and lie vacant. Please preserve the view, the architectural heritage of our Main Street, town centre and esplanade. This should be a major concern when planning is sought to demolish ANY old building in the town.

Preserve beautiful spaces like the People's Park - a lovely old Victorian park. Please preserve the view looking from the new park entrance by the boardwalk up to the mountains - it is beautiful sweeping parkland running along the river, with lovely old houses at the top of the park and a beautiful backdrop of mountains. This view should be preserved and protected.

Please protect all the old trees in the People's Park and around the town from either being cut down or from being brutally pruned so as to ruin their shape - as has happened in the town. There must be a process whereby residents are informed of the council's plans to cut down trees so that we have a chance to object. There have been some beautiful old trees cut down with no consultation. We treasure those trees as part of OUR natural heritage.

Please preserve the esplanade and harbour as unique areas of architectural importance. Greystones is a terrible lesson on what can happen when we have developer-led planning that ends up ruining architectural heritage. The harbour must NOT be developed - there is no need for it.

Please preserve the harbour as a wildlife reserve. Please make it into an official wildlife reserve. Any work should take into account the fact that it is a precious reserve for so many beautiful wild birds and they should be protected from disturbance of their habitat. This means no development and no harsh lighting to be installed. They live there.

Please prioritise making the town's open spaces friendly to wildlife - in terms of planting and leaving some areas wild. We have lost so much of our biodiversity in recent decades and the preservation of environments for our wildlife is a top priority for me.

Please allow for community gardens in the town and spaces for people to grow their own food when planning new housing.



**From:** Clifton and Sarah Rooney  
**Sent:** 28 August 2017 22:02  
**To:** Planning - Plan Review  
**Subject:** Bray MD LAP  
**Attachments:** MD lap.jpg

To the administrative officer, Planning Section,

My Details:

Clifton Rooney  
102 Deepdales

Southern Cross

Bray  
8'

I am writing to submit my objection to the development proposed in the area on the Little Sugarloaf adjoining the Kilruddery Estate. The areas are noted with '?' symbols on the map attached. The area is a local walkway of stunning natural beauty appearing to support considerable wildlife. It is used by locals to enjoy what is left of their natural world in the Bray Area and its development would constitute an irreversible and undesirable fundamental shift for residents in the area.

The Southern Cross Road has been long neglected in terms of provision of local facilities for its community. The road edges have largely been poorly maintained for years and there is a large area of scrubland left undeveloped on the Northern side of the road opposite the Industrial Estate.

The road is heavily over-used with regular traffic build-up during commuter/school hours. It is also dangerous to cycle on with no provision of a cycle lane. There is no local shop for the residents and no new school to facilitate the extra residents which have joined the area over the past 20 years. The only constructive community-focused development which the area has seen in some time was the development of the Coral Leisure Centre.

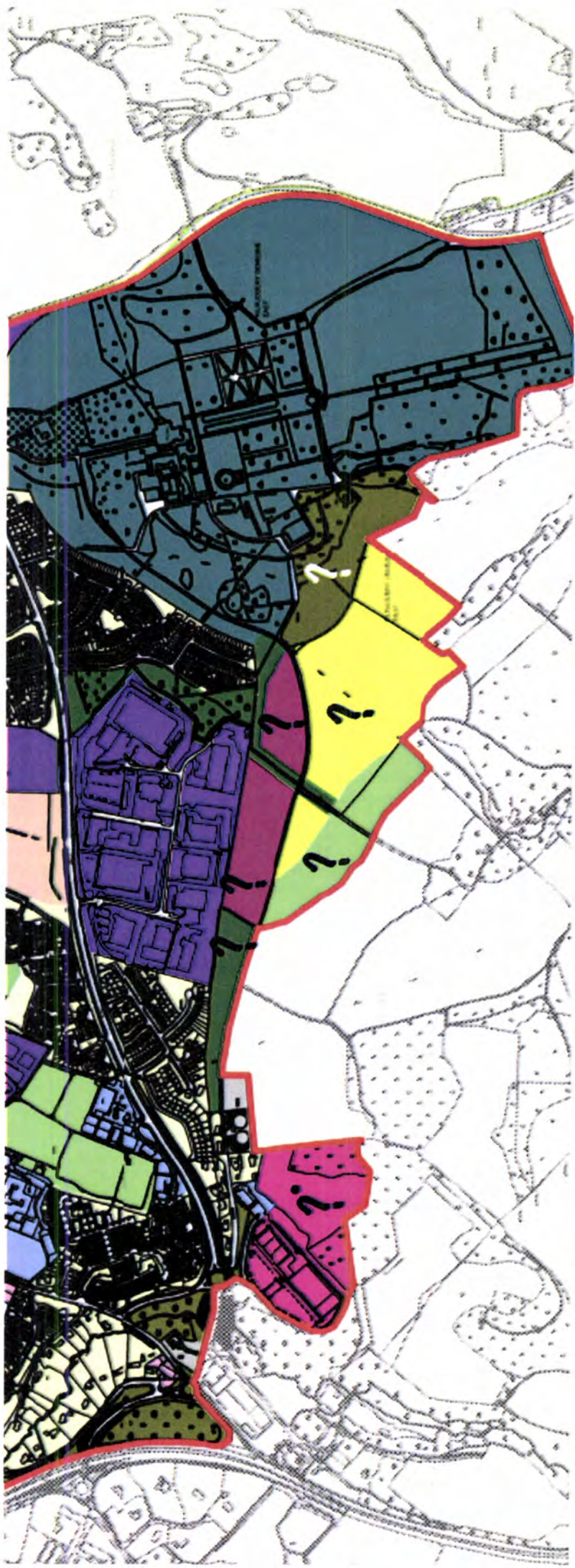
The introduction of more houses, destruction of rural/agricultural space for suburban green areas and introduction of industrial or commercial warehouse type units will significantly detract from the area, increasing through-traffic and adding no sense of community. This development will turn an area which has been long neglected as a community into a satellite Urban service-stop. Our beautiful natural/agricultural surroundings will be replaced with shopping units for bulk items, parking and an increase in population further pressing upon the limited resources of the existing community.

I oppose the proposed changes in the strongest terms.

Sincerely,

Clifton Rooney,

Local resident.





C263

**Leonora Earls**

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**From:** Des Rooney [mailto:desrooney@gmail.com]  
**Sent:** 30 August 2017 11:53  
**To:** Planning - Plan Review  
**Subject:** Proposed additional Housing/Business development on lower slopes of Little Sugarloaf

I make 2 technical submissions :

1. Flooding/landslide risk due to loss of infiltration on lower mountain – aggravated by climate change and incidences of deluge where normal drainage is overwhelmed (as currently in Donegal, India and Houston where engineering solutions have utterly failed).

See <https://projects.propublica.org/houston-cypress/>

Your own Flood Risk Assessment seeks to avoid responsibility:

“All information in relation to flood risk may be substantially altered in light of future data, new methodologies and/or analysis. As a result, all landowners and developers are advised that Wicklow County Council can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments”

**You are hereby on notice that your purported Disclaimer is not accepted and that this submission will be made available to any persons who may in future be affected by flooding due to the proposed re-zoning of the foot-lands of Little Sugarloaf mountain**

2. Traffic overload on S Cross - this is already apparent on what was originally designed purely as a relief road

Please acknowledge.

Des Rooney  
109 Deepdales  
S Cross, Bray

**Leonora Earls**

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**From:** Mike Ruddock [mailto:mike.earls@wco.wicklow.gov.ie]  
**Sent:** 05 September 2017 15:53  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews; olobrain@gmail.com; Cllr. Brendan Thornhill; pvince@wicklowcocco.ie  
**Subject:** Deepdales Resident - Objection to Re-Zoning Lands on the Killruddery Estate.

Dear Wicklow County Councillors,

**Re - Proposal to Rezone land on Killruddery Estate - above Deepdales**

I refer to the above and the plan to rezone lands above Deepdales for residential units. I write to object to the proposed re-zoning of this area. I submit my objection to this proposal based on the following -

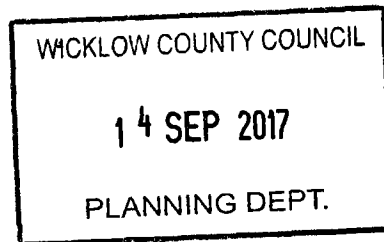
1. I was of the impression that this particular area was already part of an identified 'Green Zone'. If it isn't then it really should be as the elected Council should look to identify & safeguard as a Green Zone this area of outstanding natural beauty. It forms part of a local eco system that needs conservation and protection as i'm sure it provides a natural habitat for many species of plants, herbs, insects and animals.
2. Aside from the ecological disturbance rezoning for residential use would result in a significant increase of local traffic and traffic pollution. Developing land above Deepdales would lead to increased emissions pollution (as an asthmatic that is not a great outcome) , noise pollution and visual pollution particularly during the construction phase.
3. The area does not have local supporting infrastructure like shops, bars restaurants. That means even more traffic in and out of Bray and onto the N11. The Southern Cross Road already resembles a car park at peak hours without adding to its current loading. Residents of any new residential units will inevitably be forced to undertake numerous journeys thereby considerably raising local noise and pollution emissions to unacceptable levels.

In light of the above, I hereby state my dissatisfaction in relation to the proposed plan to rezone lands above Deepdales. As such I object in the strongest terms to the proposed plan. Therefore, I would like the elected members to reject this proposal.

Yours sincerely

Mike Ruddock OBE  
87 Deepdales  
Bray  
County Wicklow

Róisín & Andrew Ryder  
 32 Giltspur Wood  
 Bray,  
 Co Wicklow  
 Date: 12/09/2017



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

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 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,

*Róisín & Andrew Ryder*



**Leonora Earls**

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**From:** veronica smith  
**Sent:** 14 September 2017 17:13  
**To:** Planning - Plan Review  
**Subject:** Submission Veronica Smith, Gleann Aluinn Kilmacanogue Co. Wicklow Date 14th September 1017

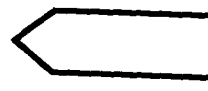
Wicklow County Council Development Plan 2016-2022 Bray Municipal District Local Area Plan 2017-2023 After viewing your recent draft plans and attending a local meeting re the above I wish to make the following submission.

My main concern is the proposed re-development of lands at the foot of the Little Sugar Loaf and also the proposed road. In my view this appears to be a plan to rectify the mistakes made by Wicklow County Council when the motorway was built. You got it wrong and now you want the residents of Kilmacanogue to suffer the consequences. You would not listen to the local people then so if you have learned anything you should listen now. The Little Sugar Loaf is home to a lot of wildlife and this needs to be protected. You propose to surround the houses, ours in particular on three sides with road and with the ever increasing traffic already, noise levels are getting louder. Thats one road

what if there are three roads. This proposed development will lower the standard of living to unbearable. As has been mentioned at a recent meeting, WCC does not want any house or businesses exiting onto to the N11 but the people of the businesses can go home in the evening and enjoy the peace and quiet. I for one do not see why I should suffer for the mistakes of WCC. I only know one local lady working in the line of businesses dotted along the N11 in Kilmacanogue on the Little Sugar Loaf side and you want to destroy our village to make made money for the big guns.

This proposal to develop land and construct a road at the bottom of the Little Sugar Loaf indicates that the Council is desperate and instead of forward thinking they are going backwards in their thinking. Where are your bright Engineers now - Australia I heard.

Veronica Smith



**Leonora Earls**

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**From:** Joy Hunter  
**Sent:** 15 September 2017 08:52  
**To:** Planning - Plan Review  
**Cc:** Brien Gilmore; John Behan  
**Subject:** Draft Local Area Plan for the Bray Municipal District  
**Attachments:** Site Location Plan.pdf; Submission for Draft Local Area Plan of Bray.pdf

Dear Sirs,

Please see attached a letter wishing to make a formal submission regarding the Draft Local Area Plan for the Bray Municipal District.

Please see map attached also.

Kind Regards,  
Joy Hunter.  
Bursar.  
Direct Line 0.



Scoil Ghearáid Naofa,  
Bóthar Cnoc na Sceach  
Bré, Co. Chill Mhantáin



St. Gerard's Senior School  
Thornhill Road,  
Bray, Co. Wicklow

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

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

14<sup>th</sup> September 2017.

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

Dear Sirs,

We wish to make a formal submission regarding the Draft Local Area Plan for the Bray Municipal District.

St. Gerard's School is a co-educational private day school which provides education to students at Montessori, Primary and Secondary levels. Founded in 1918, St. Gerard's operates on a significant site on Thornhill Road overlooking Bray (please see enclosed map).

Our School provides extra-curricular activities in the evenings, at weekends and throughout the holiday periods and as a result is in operation seven days a week throughout the calendar year. Whilst we note that our campus is within the jurisdiction of Dún Laoghaire-Rathdown County Council, its proximity to the areas outlined within the Bray Municipal District Local Area Plan mean that any proposed development changes in the neighbouring areas could have a bearing on the operation of our School.

We note the following observations regarding the Draft Local Area Plan:

- Road Objective RO4 proposes a new north-south route from the new distributor road at Fassaroe across Ballyman Glen to link up with Old Conna Road. This proposal could provide an opportunity to remove/limit through traffic from Thornhill Road, but should be undertaken in a manner appreciative of School operations.
- Transport Zoning Objective PT3 supports the extension of the LUAS and other transport links in the area. Transport Zoning Objective PT5 references new development of land at Fassaroe, which is expected to increase traffic in the area. We appreciate that these developments will incorporate improved transport and road infrastructure in the area and would request that their effect on our campus is considered as part of the review process.
- Improved east-west linkages in the area and improved and/or increased number of road crossings of the Dargle river may improve access towards St. Gerard's from Bray Town which would be a benefit to our School population.

We request that the Local Area Plan for the Bray Municipal District recognises the location and activities of our School campus located on Thornhill Road.

Yours sincerely,

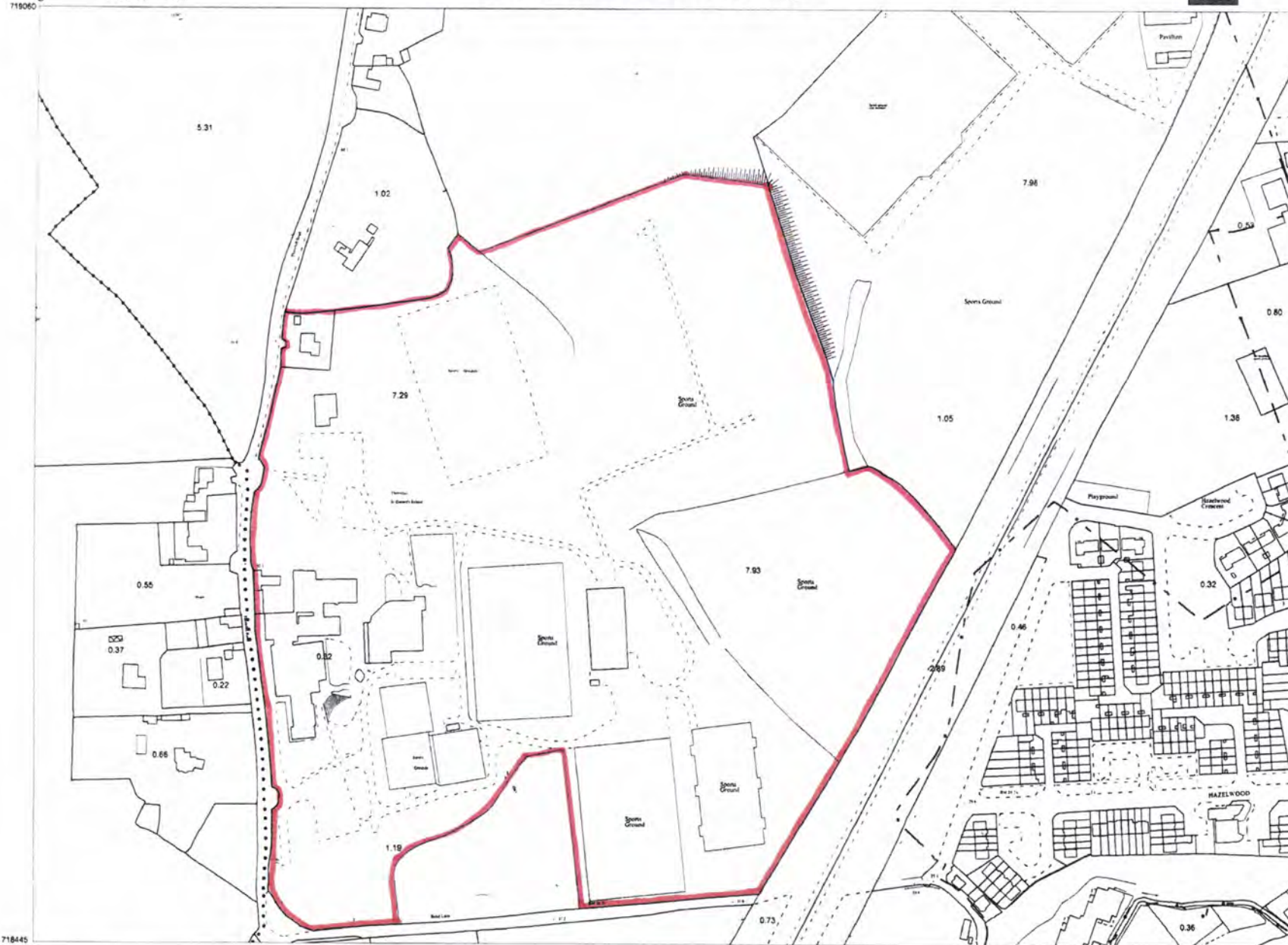


Mr John Behan  
Chairman of the Board of Directors  
St. Gerard's School



Surveyed 1979-2000  
Revised 2016  
Levelled 1977

# Urban/Rural PLACE Map



**ITM CENTRE PT COORDS**  
724815,718752

**DESCRIPTION**

**MAP SHEETS**

**1:1000**  
3568-07 3568-12  
**1:2500**  
3568-A 3568-C



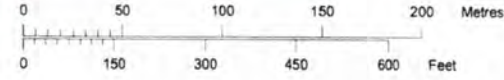
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On behalf of Ordnance Survey Ireland,  
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Scale:- 1:2,500  
Scála:- 1:2,500



Plot Ref. No. 25302700\_1\_6  
Plot Date 24-JUL-2017



**Leonora Earls**

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**From:** tmjs77@gmail.com on behalf of Tessa Stewart [mailto:tmjs77@gmail.com]  
**Sent:** 09 September 2017 15:56  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District local Area Plan 2017  
**Attachments:** Tessa submission Draft Bray MLAP.docx

Please see attached, this is a different submission under my name.

Thanks,  
Tessa

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

Submission on RE-ZONING. From Tessa Stewart, 171 Charnwood.

### **RESIDENTIAL ABOVE SHOPS**

I fully support the idea that shops will be able to have residential accommodation above them. This goes with Jane Jacobs' view that it keeps communities economically and socially vibrant, and keeps them safer at night.

### **GREENWAY ALONG SWAN RIVER**

This is excellent for bio-diversity, my husband saw an otter there two years ago. It also provides a wonderful venue for all ages, especially teens. Though some people complain about anti-social behavior in this area from young people, my husband walks there all the time and the teens are friendly and he feels safe. The only problem is the rubbish, especially in summer, but he brings a large bin bag and clears it up. We strongly think young people need a place like this to go.

### **R20, KILRUDDERY RESIDENTIAL**

I pay the membership fee annually to walk in this area, including the fields when there are no crops in them, and see how very widely it is used. It would be very sad to lose this amenity, along with the views. I submit it should be kept as a public amenity.

### **R20, REZONING Oldcourt Demense, Behind Charnwood**

#### **TRAFFIC ISSUES ON VEVAY ROAD**

Vevay road is a main thoroughfare that is already at capacity during term time, and any further development will exacerbate the congestion and potentially affect air quality. There are new houses coming on stream already along Church Road. There is an increasing amount of traffic not able to move when kids are coming out of schools, breathing the fumes. Additionally it is very hard already to exit Charnwood during term times. The only other possible solution is for a school bus system as exists in many other countries.

#### **HISTORICAL NATURE OF DEMESNE**

The oak trees surrounding the field for development are 400 years old, according to a specialist arborist, and need a 15 metre zone to protect the roots from any development.

#### **PARKING IN SEA FRONT AREA**

If the Dawson's amusement site is to be developed, there must be an equal amount of parking provided as currently exists on that site.

#### **CLIMATE CHANGE**

#### **SUSTAINABLE BUILDING**

Any new developments should be required to have energy conservation measures in place.



## FLOODING

Developers should be told that storm and surface water infrastructure needs to be ready for more intense rain events. The Council should mandate that front and back gardens cannot be paved over unless provision is made for run-off. **Preferably porous solutions should be used.**

For example, in Charnwood estate all the water is flowing down the hill to our street at the bottom of the hill, where it does not disperse into the already full storm drain. Every year more people pave over their gardens and soon we will have water in our front doors. We already need a drain upgrade.

9<sup>th</sup> Sept 2017

**Leonora Earls**

---

**From:** tmjs77@gmail.com on behalf of Tessa Stewart  
**Sent:** 08 September 2017 12:42  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District local Area Plan 2017  
**Attachments:** Submission to Wicklow County Council.docx

Dear Planning Officer

I attach our submission for the Bray Municipal District local Area Plan 2017.

Many thanks,  
Tessa Stewart



Virus-free. [www.avast.com](http://www.avast.com)

## **ZONING #R20, OLDCOURT ESTATE: Draft Bray Municipal District Local Area Plan. 2017**

Submission from Charnwood residents living in end row of houses adjoining Oldcourt field, east of River Swan.

### **TREES**

#### **Maintenance of existing trees, hedges and embankments between adjoining field and ends of gardens in last row of houses in Charnwood:**

We welcome the recommended greenway along the Swan River in the Oldcourt Estate, linking up to the Dargle River. Similarly we would like to inform the Planning Department that there are trees of historical importance at the bottom of our gardens. We would ask that the trees, hedges and embankment at the end of our gardens would be considered as natural features to be retained under the objective that existing mature trees and hedges should be preserved along with an adequate buffer zone between any development in any planning application. This would ensure that the impact of the new development would be minimized, as well as providing a natural barrier between our estates. (Wicklow Green Infrastructure Development Plan Strategy. NH3, NH14, NH19.)

#### **Notes on special nature of trees.**

The oak trees on both sides of the field are hundreds of years old, and are part of the original Oldcourt Demesne and which are shown on the old 6" maps, upon which many Tree Protection Orders exist, namely on the trees by the river, on the other side of the field marked for development. Being large and mature trees, they would be expected to support a wide variety of bio-diversity and enhance the overall environment.

#### **Suggested easement of 15 metres**

We would ask for an easement of minimum 15 metres exclusion zone to the development boundary would be appropriate to protect the trees on both sides of the field, our side and the river side, in order to protect their root base. This would also make a barrier between our estate and the new estate, and ensure new residents don't request the trees are removed due to health and safety.

### **EMBANKMENT**

#### **Suggested retention of existing embankment at end of our gardens: recommended as flood prevention for field earmarked for development**

The existing embankment on which the hedges grow beside the trees is about 4 or 5 feet high, and acts as a natural water barrier between our estate and the field. If it was removed more water would run down our estate into that field. Every year more homes pave their front gardens, and we are already seeing water gathering in front of the embankment and in front of our houses, as run-off grows. In view of predicted increases in heavy rainfall events we suggest these embankments be retained.

Tessa Stewart and Peter Crisp

171 Charnwood

8<sup>th</sup> September 2017

## Bernadette Harvey

---

**From:** tmjs77@gmail.com on behalf of Tessa Stewa  
**Sent:** 18 September 2017 17:39  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal plan 2017  
**Attachments:** Kilruddery.docx

Sorry this is late.  
An addition.  
Best regards  
Tessa Stewart



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## Sugarloaf- Kilruddery Zoning

In 2008, the Green Party Minister for Environment, John Gormley made a ministerial order for the Great and Little Sugarloaf Mountains that an area of special amenity be designated for the area.

I would ask that Wicklow CoCo to comply with the Green Party Ministers order from 2008 and once and for all put an end to inappropriate development in this area of outstanding natural beauty. I also ask that an objective be included in the Bray LAP to create an SAAO for the Great and Little Sugarloaf Mountains.

One of the reasons for this land zoning proposal is because there is a requirement to provide lands for over 6000 residential units for Bray to meet our population target. The population target was set in the County Development plan last year and was agreed by the vast majority of councillors. The planners have looked at the entire town to find suitable land and have presented a draft plan for public consultation.

I understand the needs, but have concerns about some of these sites due to loss of green space and our natural environment. Bray is already very compactly filled in, and traffic is getting slower and slower. **If Fassaroe and Kilruddery do go ahead, I would suggest that tall trees are planted at the outset to screen the housing, which should remain low in height.**

**The Dawsons site will create an increased need for parking, as will the Ulysses extension plan. It is already very hard to park on the seafront. I would recommend Dawson's site have the same amount of parking available for the public as now.**

In summary, Councillors have an obligation to agree a Local Area Plan based on what was agreed in the overall County Plan.

Signed: Tessa Stewart

171 Charnwood

Bray. 15<sup>th</sup> Sept.

**Leonora Earls**

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**From:** Diane Sutton [d]  
**Sent:** 13 September 2017 23:07  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley; Cllr. Christopher Fox MCC; Cllr. Tom Fortune MCC; Cllr. Miriam Murphy; Cllr. Edward Timmins MCC; Gail Dunne  
**Subject:** OBJECTION - Kilmacanogue Proposed Roadway/Land rezoning

To protect our community, and particularly an Area of Outstanding Natural Beauty, **I wish to lodge my strong objection** to Wicklow County Council's proposal for roadway and rezoning of lands on the lower slopes of Little Sugarloaf.

If you need further details on my objection reasons, as a local resident please contact me at:-

The Bungalow  
Templecarrig  
Delgany  
Co Wicklow  
087 9020101

Diane Sutton

**Bernadette Harvey**

---

**From:** Diane Sutton [mailto:dsutton@kilmacanogue.ie]  
**Sent:** 13 September 2017 23:07  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley; Cllr. Christopher Fox MCC; Cllr. Tom Fortune MCC; Cllr. Miriam Murphy; Cllr. Edward Timmins MCC; Gail Dunne  
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If you need further details on my objection reasons, as a local resident please contact me at:-

The Bungalow  
Templecarrig  
Delgany  
Co Wicklow

Diane Sutton



C270

Mr Anthony and Mrs Janet Swaine  
86 Giltspur Wood  
Bray  
Co Wicklow

The Administrative Officer  
Planning Section  
Wicklow County Council  
Wicklow Town

September 10<sup>th</sup>, 2016

Reference **BRAY MD LAP**

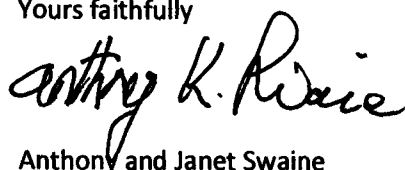
Dear Sir/Madam

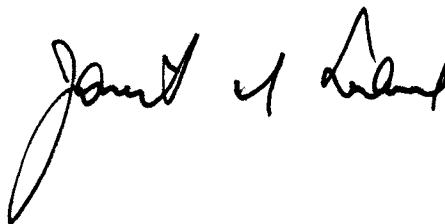
We would like to object to the proposed rezoning of land adjacent to Giltspur Wood in Bray. My reasons for this objection are:

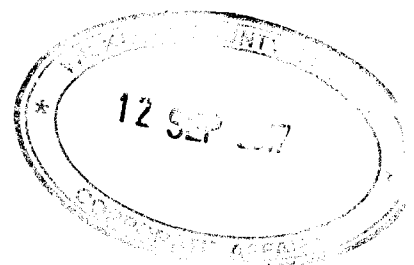
- 1) The proposed rezoning presents a serious threat to health and safety. The existing estate has many young families and children play on the green space and the roads. There will be increased traffic in the estate, particularly during any construction but also after occupation of new houses increases the population accessing the estate. In a previous development in the estate there were injuries to children who entered the building site and this is difficult to control.
- 2) Access to the newly zoned area would require breaking through at the end of an existing cul de sac and make a quiet area busy.
- 3) Traffic on the Soldiers Road is already quite heavy in spite of the introduction of a one-way system: exit from the estate via the Killarney Road traffic lights is already congested and will only get worse.
- 4) There will be a loss of green space if the land is rezoned which may have an impact on plants, trees and wildlife. This loss would be not only the rezoned land itself but land taken from our existing estate to improve traffic access to the new houses.
- 5) Green space is an important part of town planning and loss of green space/ density of building represents a deterioration in quality of life for residents of the area and will increase noise levels, particularly during construction.
- 6) It is difficult to see how this proposed development could avoid damaging trees on the land for which a preservation order exists.
- 7) There is a 600-year-old protected structure on the land.

If you would like to discuss the matter further with me, my contact details are as above and on the attached sheet.

Yours faithfully

  
Anthony and Janet Swaine









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Handwritten text, possibly a signature or name, located in the lower-right quadrant of the page.

Submission to The Administrative Officer, Planning Section, Wicklow County Council Ref Bray MD LAP

This submission was made by:

Mr Anthony and Mrs Janet Swaine  
86 Giltspur Wood  
Bray  
Co Wicklow  
Tel: 0000  
Em: 0000000000

**Leonora Earls**

**From:** SWAP [sw.  
**Sent:** 04 September 2017 18:19  
**To:** Sorcha Walsh  
**Cc:** Planning - Planning and Development Secretariat; Cllr. Edward Timmins MCC; Cllr. Brendan Thornhill; Cllr. Christopher Fox MCC; Cllr. Joe Behan; Cllr John Ryan; Cllr. Michael O'Connor; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Steven Matthews; Adrian Mckenna; Anne Marie Byrne; Brian MacSweeney; carmen cullen; catherine byrne; Derek and Ann Crinnions; Eleanor Phillips; herbert wright; Joan Conway; Mary Dorothy; Niamh Kelly; Pauline O'Brien; sue\_lynch@yahoo.com; thenolans2007@gmail.com  
**Subject:** RE: Awaiting reply re Flood Zone area on old Bray Golf Club lands queries

Dear Sorcha,

As promised, our – hopefully much clearer and now single – question in response to your email, with just one preliminary. I would like to repeat the apology expressed in our immediate response to you. If we inadvertently seemed to personalise our frustration at the sequence of automated responses we were receiving, it was certainly not meant for either yourself or Bernadette or any individual colleague. Nor is it in this email. We tried to direct our questions to you for the opposite reason: you answer us as clearly and as promptly as you can. As I said in my earlier mail, it is neither your fault, nor ours, that Wicklow's planning section seems to have more on its plate than it can reasonably be expected to handle.

You have answered our query as to whether the division of Mixed Use on this site in the 2011 Plan into Zones 1, 2, and 3 have been dropped (the answer is 'Yes') in the 2017 Plan. You have given the reason as being 'to afford more flexibility in the design' of any future proposed development. We would entirely disagree that there should be any flexibility with regard to building on floodplains downriver from our – or any – community, but we will take that up in our submission. Thank you for answering this query.

Our one remaining question then is regarding the executive's choice of maps:

***'Why are Maps no C6 and C1 allowed to extend Flood Zones A & B on your map SFRA1 to such an extent that almost the entire site on the old golf links land is included, rather than the 8.6 acre (3.48 hectare) floodplain comprising the corridor of low-lying land adjacent to the Dargle river?'***

We understand that the your map SFRA1 is used as the basis of your Justification Test, and that this, in turn, is based on the sources listed on page 3 of the SFRA for the Draft LAP. The reason for our assumption that Map no C6 was mainly the basis of your map SFRA1 was because we were directed to this map at the Public Consultation Day when we asked where the extensive flood zone shown there had come from.

That made sense. The only sources listed on page 3 of the SFRA that lend any credence to the validity of Map SFRA1 as a basis for the Justification Test are Maps no. C6 (the Wallingford Study of 2007 showing potential flooding if no flood defences were put in place) and C1 (National Coastal Protection Strategy 2009). Granted, these maps extend the area designated as Flood Zones A and B to such an extent that this entire site can pass the Justification Test.

However, it is difficult to see how these two studies can elevate the high ground on the golf links, which has never been flooded even without flood defences, to Flood Zones A and B, which according to the Government's Flood Risk Management Guidelines are:

- 'Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding)'.

The only way that flooding could occur on the high grounds here is if the recognised floodplain (as opposed to a flood zone) comprising the corridor of low-lying land alongside the river was flooded first. This is clearly shown, even as possible flooding, in maps C1 and C6.

Therefore, it is common sense to protect this low-lying land – the floodplain – from development, not the high ground, because in preventing development on the low ground you are also protecting the high ground for longer from flooding.

In addition, the Government's Flood Risk Management Guidelines very clearly state from the 'get-go', ie. the 'Overview of the Guidelines: at City and County Level' on page v, point 10:

*'Planning authorities will ensure that development is not permitted in areas of flood risk, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level.'*

A floodplain is simpler to define than a flood zone. It is an area of low-lying land adjacent to a river, stream, or sea that floods when the river, stream, or sea is unusually high. That describes perfectly the 8.6 acre (or 3.4 hectares) corridor of low-lying land alongside the Dargle that floods consistently, even with flood defences in place.

Finally, we absolutely agree with you and with the OPW that 'PFRAs are quite 'unreliable' as an indicator of flood risk, having been created by a computer model without any actual site survey work'. We also agree with the OPW that the further flood risk assessment necessary cannot be properly carried out while flood defences are still being erected.

If you (on behalf of the executive of Wicklow County Council) can give us a simple evidence based answer, Sorcha, to our question as to why the high ground is now being considered as Flood Zone A or B on the strengths of the sources quoted, we would be glad to hear from you. Otherwise, please don't add this to your already large workload. We shall just go ahead and prepare our submission in the hopes that our elected representatives will see the sense in protecting the low-lying floodplain, as opposed to throwing the baby out with the flood water as the executive seems intent on doing.

Yours sincerely,

*noeleen mcmanus*  
for SWAP  
007

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**From:** Sorcha Walsh [mailto:SWalsh@wicklowcoco.ie]  
**Sent:** Monday 4 September 2017 13:19  
**To:** 'SWAP'  
**Subject:** RE: Awaiting reply re Flood Zone area on old Bray Golf Club lands queries

Dear Noeleen,

Thank you for your email.

While I apologise for the delay in responding to you, it is simply down to the fact that that our forward planning department has full staff of 3, of which myself and Bernie were out last week, and there simply is no one else that has the knowledge that can respond to your query.

I might also point out that I feel that Bernie has been very diligent in responding to all your queries to date, and we, as well as the councillors have spent significant time over the last year considering and discussing all of the issues you have been raising.



Regarding your questions, I'll do my best to answer but I am finding them a little bit confusing as they do jump back and forth a bit:

1. The carrying out of a development plan flood risk assessment requires the collecting of existing data about flooding from a range of sources. This is likely to include any maps prepared by the OPW, such as PFRAs or CFRAMs; studies / maps prepared by the Local or national government, such as a local council or a government department, and any data / studies prepared / commission by any bodies, public or private. We also gather together historical flood data from both the OPW but also from archives, newspaper articles, local sources, area engineers past and present. We consider old OS maps, alluvial soil maps, contour maps and any data sources at all that can help 'build a picture' of flooding / flood risk in any area. All of these sources are listed on p3 of the SFRA for the draft Bray plan. All of these data sources that are in map format or are 'mapable' are shown in the study.
2. All of these maps and data sources are then collated – pulled together to create one single map to show what are called the A and B flood zones (1:100 and 1:1000). We use our GIS mapping system to allow us to do this, whereby we can 'overlay' all of the different sets of data. It may well be in any given location that an OPW map of the 1:100 risk (zone A) does not fully correlate to say an alluvial soil map or a study carried out for a flood protection scheme, and that is fine, as different methodologies are often employed or maps were drawn up at different scales of accuracy. Our job in preparing a development plan SFRA is not to say which study is the best or right / wrong, but to try to create single unified map that shows, in or expert opinion, the best representation of the A and B zones.
3. These zones are then used to 'test' the emerging zoning options and to carry out the 'justification test'. That is what the A and B zones are for – not a statement that 'this area definitely floods' or 'this area definitely does not flood'.
4. The map that was used to 'test' the plan is not Map C6. This is simply a reproduction of the map / assessment of risk that was determined for the Dargle flood defence scheme. The map against which we assessed the plan and carried out the justification test is map SFRA1. More details of SFRA1 are shown on SFRA2a-c and in the maps shown on pages 16-37 of the report.
5. I have to assume that because map SFRA1 shows the flood risk at the golf club correlating closely with Map C6 you are assuming we are using map C6 'as the basis' for our justification test. However in drawing up SFRA1 we have considered all of the sources not just map C6. Extensive study and analysis was carried out for the flood protection scheme and we would find that data highly persuasive. In contrast, the OPW would be happy to say (from my experience) that the PFRAs are quite 'unreliable' as an indicator of flood risk, having been created by a computer model without any actual site survey work.
6. The Council executive, including a range of staff of different disciplines, are satisfied that the 'justification test' is passed for the golf club lands.

With regard to your other question: the 1-2-3 zones of the previous plan are no longer included in the new draft plan. The 'Mixed Use' area measures 17ha. 5ha is under development for the schools. This leaves 12ha for the development of 1000 units (at an average density of 100/ha) and 2ha for a park. The plan does not state where either must be located. This will be a matter for the designers of any new development (if the current permission is not taken up). The design of any such development would have to include a 'project' flood risk assessment which will determine where the best location for each use is vis-a-vis any flood risk or any other important environmental / spatial planning criteria. The purpose of this change is to afford more flexibility in the design.

I hope this answers your queries.

Sorcha Walsh

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**From:** SWAP  
**Sent:** 03 September 2017 19:47

**To:** Planning - Admin

**Cc:** Sorcha Walsh; Lisa Rothwell; Bernadette Harvey; Cllr. Edward Timmins MCC; Cllr. Brendan Thornhill; Cllr. Christopher Fox MCC; Cllr. Joe Behan; Cllr John Ryan; Cllr. Michael O'Connor; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Steven Matthews; Adrian Mckenna; Anne Marie Byrne; Brian MacSweeney; carmen cullen; catherine byrne; Derek and Ann Crinnions; Eleanor Phillips; herbert wright; Joan Conway; Mary Dorothy; Niamh Kelly; Pauline O'Brien; [sue\\_lynch@yahoo.com](mailto:sue_lynch@yahoo.com); [thenolans2007@gmail.com](mailto:thenolans2007@gmail.com)

**Subject:** Awaiting reply re Flood Zone area on old Bray Golf Club lands queries

Hi,

We sent the email below last Monday to Bernadette Harvey, in answer to hers of August 24, and received an automated reply saying that Bernadette was out of the office until September 12.

We presumed that someone else from planning would reply meanwhile as we need this information for our submission re the LAP for Bray – deadline September 15.

As we have had no reply to date, we would be grateful if someone from planning (perhaps Sorcha Walsh who, like Ms. Harvey, was extremely helpful to us before?) could answer our 2 queries outlined below.

Many thanks.

Yours sincerely,

*noeleen mcmanus*  
for SWAP  
C

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**From:** SWAP [

**Sent:** Monday 28 August 2017 17:00

**To:** 'Bernadette Harvey'

**Cc:** 'Sorcha Walsh'; 'Lisa Rothwell'; [ETimmins@wicklowcoco.ie](mailto:ETimmins@wicklowcoco.ie); Cllr Brendan Thornhill ([jcbthornhill@gmail.com](mailto:jcbthornhill@gmail.com)); Cllr Chris Fox ([CRFox@wicklowcoco.ie](mailto:CRFox@wicklowcoco.ie)); Cllr Joe Behan ([joebehan@outlook.ie](mailto:joebehan@outlook.ie)); Cllr John Ryan ([jryan@greatplacetowork.ie](mailto:jryan@greatplacetowork.ie)); Cllr Michael O'Connor ([cllrmichaeloconnor@gmail.com](mailto:cllrmichaeloconnor@gmail.com)); Cllr Oliver O'Brien ([olobriain@gmail.com](mailto:olobriain@gmail.com)); Cllr Pat Vance ([PVance@wicklowcoco.ie](mailto:PVance@wicklowcoco.ie)); Cllr. Steven Matthews; Adrian Mckenna; Brian MacSweeney; carmen cullen; catherine byrne; Derek and Ann Crinnions ([derandann@gmail.com](mailto:derandann@gmail.com)); Eleanor Phillips; herbert wright; Joan Conway ([pucarua@yahoo.ie](mailto:pucarua@yahoo.ie)); Mary Dorothy; Niamh Kelly ([kellyn2@tcd.ie](mailto:kellyn2@tcd.ie)); Pauline O'Brien ([colobrien88@hotmail.com](mailto:colobrien88@hotmail.com)); [sue\\_lynch@yahoo.com](mailto:sue_lynch@yahoo.com); [thenolans2007@gmail.com](mailto:thenolans2007@gmail.com)

**Subject:** RE: Flood Zone area on old Bray Golf Club lands

Dear Bernadette,

Thank you for the reminder about the closing date for submissions. We will definitely have ours in with you in good time.

This attempt to understand why you (and I obviously do not mean this as a personal 'you', but the Planning executive of Wicklow County Council) are using Map no. C6 as the basis for your Justification Test is a very valuable part of our preparation for this submission. It gives us the opportunity to clarify with you vital issues that need to be explained in non-technical terms before the 32 County Councillors vote on them.

Map no. C6 from Appendix C (Flood Risk Assessment) to the Draft LAP, as already stated, shows potential river and tidal flooding if no flood defences were put in place. Your answer to our question 'Why this map?' is to quote the Flood Risk Management Guidelines (2.25) that '**the presence of flood protection structures should be ignored in determining flood zones**'. We are very familiar with this, as we have been quoting it as part of our argument to rezone the lowlands on the old golf links since 2012 – but it doesn't answer our question. Why choose this map, out of the suite of 9, as the basis for the Justification Test?

. After all, Map no.C6 doesn't actually have any flood defences in it to be ignored: that's the point of that map. Why not Map no. C7, for instance (discredited though it is by photographs showing that flooding has still occurred on these low lands), which does have flood defences to be ignored? ...Or, more logically, Map no. C4 from the OPW's [www.floodmaps.ie](http://www.floodmaps.ie) which shows where flooding has actually occurred, every time the Dargle River has broken its banks?

This is the 8.6 acres of lowland that our community refers to as the floodplain, and it will not pass the Justification Test. This long corridor of floodplain is not vital to the regeneration of Bray, and there is a clear alternative to building on it. To artificially extend that floodplain, by using instead a map designed to show potential flooding if no flood defences were put in place, as opposed to maps showing where flooding has consistently occurred, with and without flood defences, is disingenuous, to say the least.

If, however, we are to accept the possibility of first-time flooding occurring to the extent shown in Map no. C6 on these lands (ignoring flood defences), it is again vital to note that the tidal, as well as the river, flooding is shown on this map as coming from the direction of the river, not over the railway line from the sea. In other words, it is rising from the river to first flood the lowlands of the old golf links, and then, if the floods are bad enough, it will potentially flood up on to the high ground: the high grounds will be the last place to be flooded in this scenario - which makes sense.

What then will happen if this scenario is played out and the lowlands are built on? In the absence of this previously open space nearest the river, the floods will have to move even sooner onto the high ground, where two schools are now almost completed. We are not engineers, but it's common sense that if you fill the lowland there with concrete, then flooding will rise quicker to the high ground.

**This potential flooding on Map no. C6 is therefore an even more powerful argument that the 8.6 acres of low ground next to the river on the old Bray Golf links, which has been proved to be a floodplain over and over again, should be protected from development. Building on this land puts our homes, any development on the real floodplain – the lowlands – and, according to your maps, the schools, at even greater risk.**

1) *We would be very interested to receive Wicklow's planning executive's comments on this before making our submission in time for the deadline.*

We have also noted with interest that the three zones within the overall Mixed Use zoning shown in the present plan (2011-2017), ie. Zone 1: Town Centre (16.5 acres) straddling the floodplain; Zone 2: Open Space and Community (16.5 acres) on the high ground, where the schools are being built; and Zone 3: Residential (8 acres), nearer the sea, are no longer mentioned in the Draft LAP 2017.

2) *We would be grateful if you could clarify for us whether this now means that the present zonings 1, 2, and 3, no longer apply to this site, and, if so, why?*

Thank you for pointing us towards CFRAM's PFRA, but as SWAP, and as members of the Irish National Flood Forum, we have kept very much up-to-date with CFRAM's work and have continually engaged with them.

...And, as for the Flood Risk Management Guidelines, I honestly think we could probably recite most of it by heart for you now. We have been engaged in this fight to stop building on our floodplain for twelve years now. You learn a lot in that time.

We look forward to hearing from you.

Yours sincerely,

*noeleen mcmanus  
for SWAP*

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**From:** Bernadette Harvey [mailto:bernadette.harvey@wicklow.gov.ie]  
**Sent:** Thursday 24 August 2017 10:07  
**To:** 'SWAP'  
**Cc:** Sorcha Walsh; Lisa Rothwell  
**Subject:** RE: Flood Zone area on old Bray Golf Club lands

Noeleen,

Thank you for coming to our open day last week. We look forward to getting your submission in. Remember the closing date for receipt of submissions is the 15.09.17

In response to your questions outlined below

(a) PFRA's Preliminary Flood Risk Assessment – Please see the following OPW link for more information on the PFRA's <http://www.cfram.ie/pfra/>

(b) The Flood Risk Management Guidelines clearly state (2.25) *“The provision of flood protection measures in appropriate locations, such as in or adjacent to town centres, can significantly reduce flood risk. However, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The likelihood and extent of this residual risk needs to be considered, together with the potential impact on proposed uses, at both development plan and development management stages, as well as in emergency planning and applying the other requirements of these Guidelines in chapter 3. In particular, the finished floor levels within protected zones will need to take account of both urban design considerations and the residual risk remaining.”*

I would refer you to the Flood Risk Management Guidelines for more information and to the Disclaimer on p39 of the SFRA.

Kind regards,  
Bernadette Harvey

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**From:** SWAP [mailto:swap@wicklow.gov.ie]  
**Sent:** 24 August 2017 00:02  
**To:** Bernadette Harvey  
**Cc:** Cllr. Edward Timmins MCC; Sorcha Walsh; Cllr. Brendan Thornhill; Cllr. Christopher Fox MCC; Cllr. Joe Behan; Cllr. John Ryan; Cllr. Michael O'Connor; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Steven Matthews; Adrian Mckenna; carmen cullen; catherine byrne; Derek and Ann Crinnions; Eleanor Phillips; herbert wright; Joan Conway; Mary Dorothy; Niamh Kelly; Pauline O'Brien; [sue\\_lynch@yahoo.com](mailto:sue_lynch@yahoo.com); [thenolans2007@gmail.com](mailto:thenolans2007@gmail.com)  
**Subject:** Flood Zone area on old Bray Golf Club lands

Hi Bernadette,

First of all thank you for your patience with our many questions at the Public Consultation Day on Bray's Draft MD LAP.

As we told you then, we were very surprised at the extent of Flood Zone A (on the old Bray Golf Club lands) used in this Draft Plan to satisfy the Justification Test. It is much, much greater than that shown in the present Plan, in any of the OPW maps, and, indeed, in any video or photographic evidence of flooding on this land. In addition, none of us – including residents, like myself, who have lived through the '65 and '86 floods here - have ever known the high ground on the golf links to be under water.

When we pointed this out to you, according to my notes you referred us to Map no. C6 in Appendix C: Flood Risk Assessment, which is on page 46 of the written document, and on page 48 in pdf form at <http://www.wicklow.ie/sites/default/files/APPENDIX%20C%20Strategic%20Flood%20Risk%20Assessment%20dBMD%20LAP2017.pdf>.



This does indeed show a floodplain (zoned A, the highest possible danger of flooding) which is around two-thirds bigger than that shown in all previous maps – and experience. It is, however, a map drawn in 2007 (as part of the Wallingford study?) showing potential river and tidal flooding if no flood defences were put in place. It is an ‘if we do nothing’ potential flooding scenario.

The OPW and Wicklow County Council did do something: you put in flood defences at a cost of some €40 million. While we have been preaching for a very long time now that flood defences can fail, and so we need to keep open the traditional ‘escape route’ for flooding from our homes back to the river and sea (the floodplain located on the old golf links), we have not for a moment suggested that these flood defences will not result in a reduction in the extent, depth, and frequency of flooding in our area. Yet that seems to be what the Planning Department of Wicklow County Council is suggesting by using a map projecting potential tidal and river flooding, if we had no flood defences, as the basis for their Justification Test.

The following map – Map no. C7 – shows where the Wallingford study people believed potential flooding is likely to occur in a post- flood defence scenario. The bright green colour code for potential flooding doesn’t even appear on what we know to be a floodplain, i.e. the long narrow corridor of land (8.6 acres) of low-lying land along the river, which is shown correctly in Map no. C4 taken from the OPW’s [www.floodmaps.ie](http://www.floodmaps.ie). We know now that this projection is too optimistic: the attached photographs showing flooding on these lands in August and October 2016, when escape valves in the flood defences failed, prove this to be the case.

No other map in this suite of 9 maps shows flooding to this extent, except perhaps Map no. C1 (page 41 of the written document, pdf page 43), the scale of which makes it very difficult to read clearly. It does however seem to show quite extensive coastal flooding on the golf club lands. The sources quoted for this map in the table (on printed page 40, pdf page 42) are a) the OPW Preliminary Flood Risk Assessment; and b) the National Coastal Protection Strategy Study.

With regard to the first source, it is, as its title states, merely a preliminary assessment: the OPW have told us in writing that they cannot proceed to the next stage – the CFRAM (Catchment Flood Risk Assessment Management) study – until the flood defences are complete, as any flood risk assessment carried out while the defences are still under construction would be unreliable.

The second source quoted for Map no. C1 is the National Coastal Protection Strategy Study. We presume that the map used from this study as your source is that shown on pdf page 13 of the Irish Coastal Protection Strategy Study: Phase 2 – South-East Coast ([http://www.opw.ie/en/media/ICPSS\\_Appendix7\\_Flood\\_Mapping\\_Final\\_Part1.pdf](http://www.opw.ie/en/media/ICPSS_Appendix7_Flood_Mapping_Final_Part1.pdf)), as this map seems to bear the greatest resemblance to the extent of coastal flooding shown in your amalgam Map no. C1. May we point out that this Coastal Flooding prediction map was drawn in May 2009, three years before the flood defences were put in place, so it is again predicting the level of flooding that might occur without flood defences.

**Could you please explain to us why the two maps used as the basis of your Strategic Flood Risk Assessment map SFRA 2 (a) from this suite of nine (C1 – C9) shown in your Flood Risk Assessment document are both maps showing what projected river and tidal flooding would look like if no flood defences had been put in place?**

It is an important question, we believe, because using this projected, greatly extended flood zone as the basis for your Justification Test to allow building on the floodplain enables it to satisfy the requirements that a) this site is necessary for the continued growth of our town, and b) that there is no alternative site available.

If, however, we take Flood Zone A shown in the present Development Plan, in the OPW’s flood maps (such as that shown in Map no. C4), in video and photographic evidence, and in the experience of even our oldest residents, the SFRA 2 (a) would have to show 8.6 acres of low land, forming a long narrow corridor alongside the river on the former golf links: frankly this would fail the Justification Test miserably. This 8.6 acres from a 41 acre site – with just under 5 acres already suggested for a public park in your Draft Plan – is by no means vital to the development of our town, other than as a recreational space and an escape route for flooding from a very vulnerable community upriver of it.

...And there is a clear alternative – build on the high ground, and return this floodplain to its original Open Space zoning.

We look forward to hearing from you regarding Wicklow Co Council's Planning Department's choice of map sources for its Strategic Flood Risk Assessment on these lands. Many thanks.

Yours sincerely,

*noeleen mcmanus*  
for SWAP

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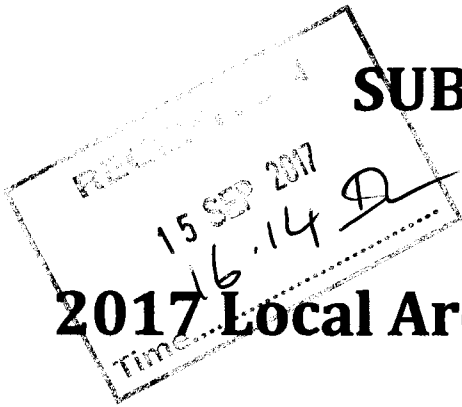
\*\*\*\*\* Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.



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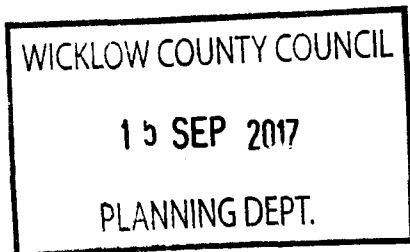
\*\*\*\*\* Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.



**SUBMISSION to**

**2017 Local Area Development Plan**

**for Bray & Environs:**



**from**

**SWAP (Safety with Alternative Plan)**

**Little Bray Community Group**

**15<sup>th</sup> September, 2017**

**Submission to Bray Local Area Development Plan 2017:**  
**from SWAP Little Bray Community Group**

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### SWAP Little Bray Community Group Submission:

We wish to make a submission to the 2017 Local Area Development Plan for Bray & Environs on behalf of our community in Little Bray.

Our concern involves the 3.5 hectares that lies along the north bank of the River Dargle on the old Bray Golf Club lands. All of our comments relate to the designation of this area and how it will impinge on the residents of Little Bray should it be zoned Mixed Use rather than, as we would argue, Open Space for use as a linear park and playing fields.

### Introduction

Our homes are on the lowlands of Little Bray along the northern bank of the Dargle River. They lie at the foot of the Wicklow mountains, upstream of the old Bray Golf Club lands adjacent to the sea, and are therefore extremely susceptible to high tides and swollen river, as was demonstrated when our neighbourhood was completely destroyed by flooding in 1905, 1931, 1965, and again in 1986.

The shaded area on the OPW map at Fig. 1 of this document shows the extent of the flooding throughout our neighbourhood and on the old Bray golf links.

Each time, the flood waters swept through our houses and on to the narrow corridor of low-lying land alongside the river on the links, where they were stored until the river and sea had subsided enough to take them back again. This is the floodplain we wish to keep free of development, because its storage capacity ensures that we can, at least, begin immediately the task of trying to clean and dry and restore our damaged homes and lives after experiencing flooding: it is our 'safety valve'.

Thankfully, the OPW and Wicklow County Council commenced flood defences between us and the river in 2012, works that are now nearing completion. However, as is clearly acknowledged by the OPW in the 'Planning System and Flood Risk Guidelines for Planning Authorities', and in our own Bray Municipal District LAP 2017, flood defences can fail (Figs. 2- 4)

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

### The Floodplain & Zoning:

A floodplain is defined as a low-lying area of land, prone to flooding, adjacent to a river or stream. That is a perfect description of our floodplain, as any golfer will tell you who has had to abandon the 2<sup>nd</sup> fairway of these links after heavy rain.

All of the golf club lands within Bray's municipal boundaries were zoned as Z33 'for the preservation of private open space' until the 1999 Development Plan when they became Mixed Use 'to provide for mixed use development in accordance with the Bray Golf Club Lands Action Plan'. This quote is taken from that Action Plan, commissioned from Brady, Shipman, Martin, Town Planners, by the then Bray Urban District Council, and published in 1999. It is reproduced on our website's archive at <http://www.archive.braywatch.com/Town/answer.html> . Point 2.1 of the report also acknowledges that: '*Part of this land (c3.5 ha or 8.6 acres) is low lying and is regarded as flood plain.*'

- However, by 2005 that Action Plan had been shelved, the Development Plan was prepared in-house, and the Mixed Use zoning had been sub-divided into three further zones:-Zone 1: Town Centre (16.5 acres);
- Zone 2: Open Space & Community (16.5 acres);
- Zone 3: Residential (8 acres).

The floodplain of 8.6 acres (3.5 ha) fell within Zone 1. It had now gone from Open Space (1993) through Mixed Use (1999) to Town Centre (2005).

Our councillors told us that they had agreed to zone it in this way because they had been told that the State would not provide flood defences, despite all best efforts to persuade them, but that Pizarro Developments would pay for them instead, if they were allowed to build on the low land, beside the river.

Nine weeks after the Development Plan had been passed, Pizarro Developments submitted elaborate plans for what was highly publicised as a 2.2 billion euro development, including high density building on our floodplain. (Fig. 5)

In 2010, they were finally granted permission by An Bord Pleanala for a slightly altered version of this plan, this time including a culvert through their two-storey basement car-park (Figure 6), to allow any future flooding to escape. The entrance to the culvert measured approximately 8m high by 10m wide: it replaced an 8.6 acre floodplain.

The 10 year planning permission (till 2020) was granted despite two different An Bord Pleanala inspectors recommending refusal, despite the appalling floods all over the country the previous winter (2009/2010), and despite the fact that Pizarro's debts were now being taken over by NAMA. Our flood defences have been paid for by the State, without a single cent from Pizarro. The Town Centre zoning on the floodplain was voted through on the basis of misinformation.

Pizarro's financial troubles continued, and last April they went into Receivership – but the planning permission attached to this land still remains. We are, separately, appealing to the Minister for Finance and the Junior Minister for the OPW & Flood Relief, together with the Minister for Housing, Planning & Local Government, to work with Wicklow County Council in buying back the 8.6 acre (3.5 ha) floodplain from the Receiver so that it will not be sold with planning permission for this huge development on our floodplain still valid.

This makes economic sense. The biggest benefactor of any monies received for this land will be NAMA, undoubtedly Pizarro's largest creditor. In other words, the taxpayer will recoup some of the money lost through a bad bank debt. In turn, though, any future flooding exacerbated by the loss of this floodplain will come out of the pockets of the tax-payer also, and we have seen over and over how expensive this can be, with the latest 'tens of millions' due to be spent on repairing the damage done in Donegal by flooding.

If the 3.5 ha floodplain is turned into a linear park and playing fields instead, as we propose, it will extend the People's Park from the west right down to the harbour, already planned for extensive development, and across to the Promenade.

The remainder of Pizarro's 17 ha site can then be safely sold at a profit, along with the rest of their assets, both inside and outside Bray Municipal District.

'At least 2 hectares' are already allocated for a park on these lands in the Draft LAP, provided Pizarro's permission is not taken up: only a further 1.5 ha are needed to make this possible.

If housing is planned on this overall site (provided the extant permission is not taken up) at a rate of 100 units per hectare, we are talking about losing 150 housing units on a floodplain, out of a total of 1000 overall. We believe that these 150 units could be moved up to the Fassaroe area, also planned for development instead of housing people on a floodplain. ...Particularly when, from experience, we know that they will not be able to insure those homes.

We are aware also that, according to Bray Retailers' submission, retail density proposed for this site is too high. If this is pulled back to a more reasonable level, it will leave more space for housing units on the high ground.

Again this makes sense. The Florentine Centre at the heart of our real Town Centre, between the Main Street and the two main roads down to the seafront (Quinsboro and Florence) has remained derelict, killing our town, for too many years. We believe that the Florentine project could truly regenerate Bray, but that this will not happen while the threat of a huge shopping development on the other side of the river hangs over it.

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

- a) protect the floodplain from future development, provided it is not sold with the present planning permission intact;



- b) send out a clear message to our Government that Wicklow County Council want our floodplain retained in this way for the safety of its people; and
- c) send out a message also that this County knows how to recognise and rectify mistakes made in the past in all good faith. Today we have too much knowledge of flooding, floodplains, and climate change to be ignorant of its consequences.

Instead, the 2017 Draft LAP for Bray returns the entire site to the Mixed Use zoning of the 1999 Development Plan – the Plan that allowed Town Centre zoning to be imposed on the floodplain in 2005. The reason we have been given for this Mixed Use zoning is ‘to afford more flexibility in the design’ ... ‘if the current permission is not taken up’.

We strongly maintain that there should be no flexibility regarding building on a floodplain: the zoning should, as per the OPW’s clear Guidelines, protect floodplains – even with flood defences in place – from development. The only way this prohibition can be avoided is if the site passes the Justification Test, which we have laid out in full at Fig. 7 of this document: it is reproduced from page 37 of the ‘Planning System and Flood Risk Guidelines for Planning Authorities’.

#### The Justification Test and the old Bray Golf Club lands:

The written statement of the 2017 Draft LAP describes briefly (on page 63) the plans for the old Bray Golf Club lands, with no mention of the floodplain. The flood risk involved here is dealt with solely, and again quite briefly, in the LAP’s ‘Appendix C: Strategic Flood Risk Assessment’ at

<http://www.wicklow.ie/sites/default/files/APPENDIX%20C%20Strategic%20Flood%20Risk%20Assessment%20dBMDLAP2017.pdf> . Here, at page 22, the old golf lands are referred to as B4 (a) and treated alongside B4 (b), the land at Rehills. Both have Flood Zone A areas designated within them.

B4 (a), the old golf links, pass the Justification Test according to the Draft LAP, allowing building on the floodplain, while B4 (b) fails it, although it is clearly flagged in the ‘Recommendation’ at the end that the lands at Rehills are also being considered as a possible site for development in the future. The ‘Recommendation’ for B4 (a), the old golf links, is simply ‘No further action required’ - despite Map SFRA 1 (Fig. 8), showing

almost all of this site now, not just the low lands beside the river, as Flood Zones A and B, the two highest categories of flood risk. This is the map, we were told, against which the plan for the golf club lands was assessed, and on which the Justification Test was carried out.

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

Firstly, it purports to enable the Justification Test to be passed because the area involved would be so large as to answer the two crucial questions in the Justification Test with a 'Yes'. We contend this is spurious. These questions are: whether this land 'is essential to facilitate regeneration and/or expansion of the centre of the urban settlement', and whether 'there are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement'.

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

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

#### Our floodplain - mapped:

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

To be perfectly clear which area of the old golf links we mean when referring to the floodplain, we would point to:

1. the final scene of the RTE news clip at <http://www.braywatch.com/floods.html> showing the golf links the morning after the '86 flood;
2. photos of the same area in October 2015 (Fig. 3) and in August 2016 (Fig. 4) when non-return valves in the new flood defences failed;
3. the OPW map taken from floodmaps.ie (Fig. 1);
4. a later Ordinance Survey map (Fig. 8) – Map 16 in the 2011 Development Plan for Bray; and
5. Map No. C4 taken from the Draft LAP 2017 (Fig. 9), just published.

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

As already stated, the map, we were told, against which the plan for the golf club lands was assessed, and on which the Justification Test was carried out is Map SFRA 1 (to be found following text page 41 of the LAP's 'Appendix C: Strategic Flood Risk Assessment'. We have reproduced the section of that map, enlarged, showing the old golf club lands at Fig. 10). This is augmented by Map SFRA2 (a), on the following page of the LAP, and also at our Fig. 11.

Both produced by Wicklow, they show a flood zone area that has grown by about two-thirds from all previous flood maps for this land. Yet, the only significant event that has occurred since the 2011 Development Plan has been the installation of flood defences. The only justification that we could find for this sudden extension of the flood zone on these lands are **Maps no. C6**, to which we were referred at the Public Consultation Day in August when we queried this, and, perhaps, **Maps C1 and C9** (all part of a suite of 9 maps between text pages 40 and 41 at the end of Appendix C).

**Map no. C6** shows potential river and tidal flooding whose extent is replicated in SFRA 1: it extends the flood zone right up onto the high ground of the old golf links. According

to its source it is a map drawn in 2007 (as part of the Wallingford study for the River Dargle Flood Defence scheme) showing potential river and tidal flooding if no flood defences were put in place.

The following map, on the other hand – Map no. C7 – shows where the Wallingford study people believed potential flooding is likely to occur in a post- flood defence scenario. It shows no flooding at all on the old golf course lands, a projection we now know to be too optimistic: Figs. 3 & 4 show flooding on these lands in August and October 2016, when escape valves in the flood defences failed.

The scale of **Map no. C1** makes it very difficult to read clearly. It does however seem to show quite extensive coastal flooding on the golf club lands. The sources quoted for this map (text page 40) are a) the OPW Preliminary Flood Risk Assessment; and b) the National Coastal Protection Strategy Study.

With regard to the first source, it is, as its title states, merely a preliminary assessment. We would agree with the statement from the planning section of Wicklow County Council that: ‘The OPW would be happy to say that the PFRAs are quite ‘unreliable’ as an indicator of flood risk, having been created by a computer model without any actual site survey work’.

The second source quoted for **Map no. C1** is the National Coastal Protection Strategy Study. We presume that the map used from this study as the source of Map no. C1 is that shown on pdf page 13 of the Irish Coastal Protection Strategy Study: Phase 2 – South-East Coast

([http://www.opw.ie/en/media/ICPSS\\_Appendix7\\_Flood\\_Mapping\\_Final\\_Part1.pdf](http://www.opw.ie/en/media/ICPSS_Appendix7_Flood_Mapping_Final_Part1.pdf)) .

This Coastal Flooding prediction map was drawn in May 2009, three years before the flood defences were put in place, so it is again predicting the level of flooding that might occur without flood defences.

**Map C9** also matches SFRA 1, but only for coastal flooding and for the Newcourt Stream. The coastal flooding is shown as Flood Zone A (high probability of flooding), and the



Newcourt Stream as Flood Zone B (moderate probability of flooding). **Map C9**'s source is CFRAM mapping July 2016.

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

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

- **Map C2** which shows contours (unfortunately not at a scale to demonstrate the sudden rise in land from the floodplain alongside our river up past the old club house and parallel line of trees), and alluvial soil. Alluvial soil is defined, among other sources, in <https://www.vocabulary.com/dictionary/alluvial%20soil> as 'a fine-grained fertile soil deposited by water flowing over flood plains or in river beds'. Not surprisingly, the low lands on the old golf links are shown as alluvial soil, not the high ground.
- **Map C3** shows only 6" mapping, and is of no relevance to flooding.
- **Map C4**, on the other hand, is taken from the OPW's [www.floodmaps.ie](http://www.floodmaps.ie) and shows flood events. Again it corresponds with the low lands of the old golf links.
- **Map C5**, while again taken from [www.floodmaps.ie](http://www.floodmaps.ie), merely indicates 'flood events', without mapping them. Strangely, it only refers to the great floods of 1905 and 1986 on the golf links, ignoring the well-documented and disastrous floods of 1931 and 1965, as well as the smaller floods in between. These multiple floods in Bray are however now documented in CFRAM's UoM 10 (Unit of Management 10) Flood Risk Plan quoted above, and:

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

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

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

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

#### Insurance:

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

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

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

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

Acceptable Risk:

There is no such thing as 'an acceptable risk' when it comes to a very vulnerable community such as ours. Ravenswell Row, Maitland Street, Ardee Street (Fig. 12) were all either built or adapted by our Council for the elderly and disabled, and they have all been consistently flooded over the years. 'Villa Marie' (also Fig. 12), also flooded, was a family home then: it is now a residential home for around eight adults, most of them non-verbal, and many of them in wheelchairs with a variety of physical and intellectual disabilities. In the Printworks apartments, at roughly the same distance from the river, young people with much milder special needs live 'independently', with the support of Sunbeam Services. In addition, there are many other elderly and/or disabled people scattered throughout our neighbourhood, either in one-storey houses, or in 2-storey houses with stairs that they can no longer climb.

All of them live at the heart of the floodplain on which our houses are built, and all of them would be both terrorised and very limited in their capacity to help themselves if the flood waters ever come again.

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

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



Summary:

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

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

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

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

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

Finally, we submit that our community, with its very vulnerable residents, needs a 'belt and braces' approach to flood protection.

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



Signed: *Noeleen McManus*  
on behalf of SWAP Little Bray Community Group

15<sup>th</sup> September, 2017.

**Main Reference Documents:**

- 1) Brady, Shipman, Martin's Bray Golf Club Lands Action Area Plan 1999,  
reproduced at <http://www.archive.braywatch.com/Town/answer.html> ;
- 2) The Planning System and Flood Risk Management – Guidelines for Planning  
Authorities, published by the Dept of Environment, Heritage, & Local  
Government, and the OPW in November, 2009 at  
<http://www.flooding.ie/media/The%20Planning%20System%20and%20Flood%20Risk%20Management.PDF> ;
- 3) OPW website <http://www.floodmaps.ie/> ;
- 4) OPW's CFRAM map for Avoca to Vartry at  
<http://maps.opw.ie/floodplans/uom/10/> .
- 5) Written Statement of Bray Municipal District Draft Local Area Plan 2017 at:  
<http://www.wicklow.ie/sites/default/files/Draft%20Bray%20Municipal%20District%20Local%20Area%20Plan%202017%20-%20Written%20Statement%200.pdf>
- 6) Appendix C: Strategic Flood Risk Assessment of Bray Municipal District Draft  
Local Area Plan 2017 at:  
<http://www.wicklow.ie/sites/default/files/APPENDIX%20C%20Strategic%20Flood%20Risk%20Assessment%20dBMDLAP2017.pdf>

**Figure 1:**  
OPW map from floodmaps.ie with shaded area showing floodplain:





**Figure 2:****Cumbria winter 2015 when their 1/100 year flood defences failed:**

The flood defences Cumbria had put in place were supposed to guard against a 1/100 year flood – like ours.

Cumbria had erected them following their catastrophic flooding in 2009.



The Cumberland Echo, reporting on the floods, on Dec. 7, 2015, said:

*'The £38bn of flood defences recently installed by the Environment Agency failed to stop the floods, causing acute embarrassment for Prime Minister, David Cameron, who is visiting the area today.'*

**Figure 3:****the Golf Course lands inside the flood defences - October 2015:**

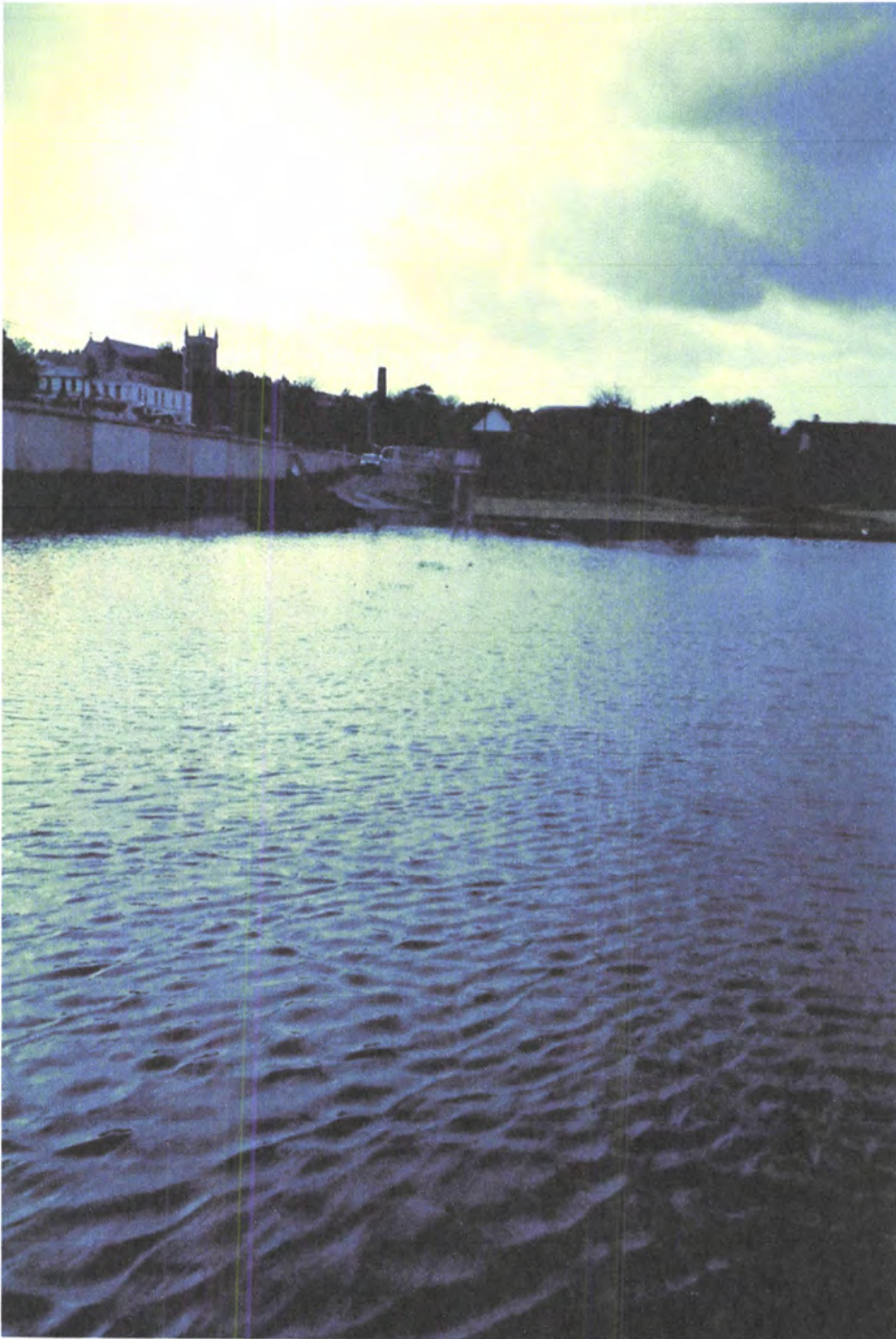
The following three photographs were taken on October 29, 2015, when one of the non-return valves that are supposed to allow water off the land inside the defences, but close when water attempts to enter from the river side, failed. A series of particularly high tides pushed the river through this faulty valve and onto the flood plain. It started around 11 am.





In the second photograph, you can see how the water is already spreading out across the floodplain...

...And in this final photograph, taken only two hours after the flooding began, the floodplain is covered almost completely.



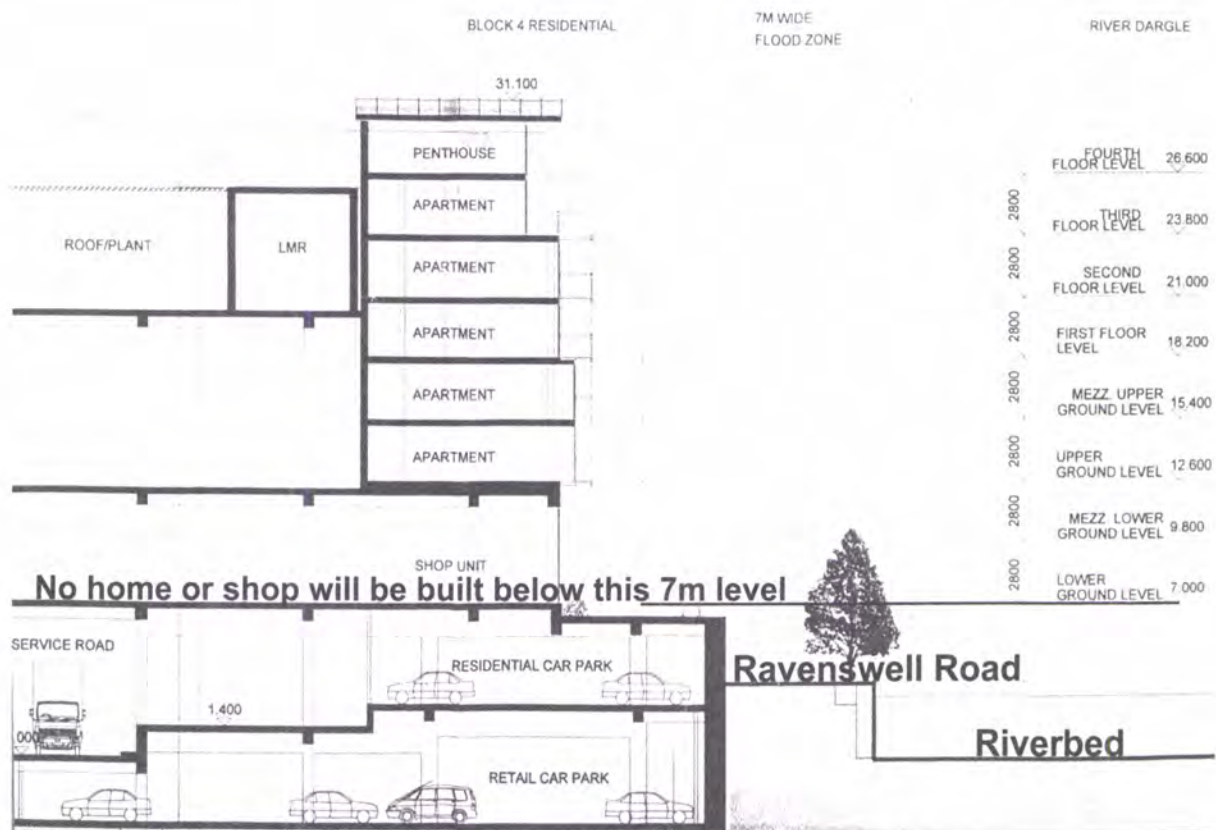
**Figure 4: the Golf Club lands inside the flood defences – August, 2016:**

Less than a year later, on 20<sup>th</sup> August, 2016, the flood defences failed again, creating what looks like a mirror image of the river – inside the defences, on the floodplain.





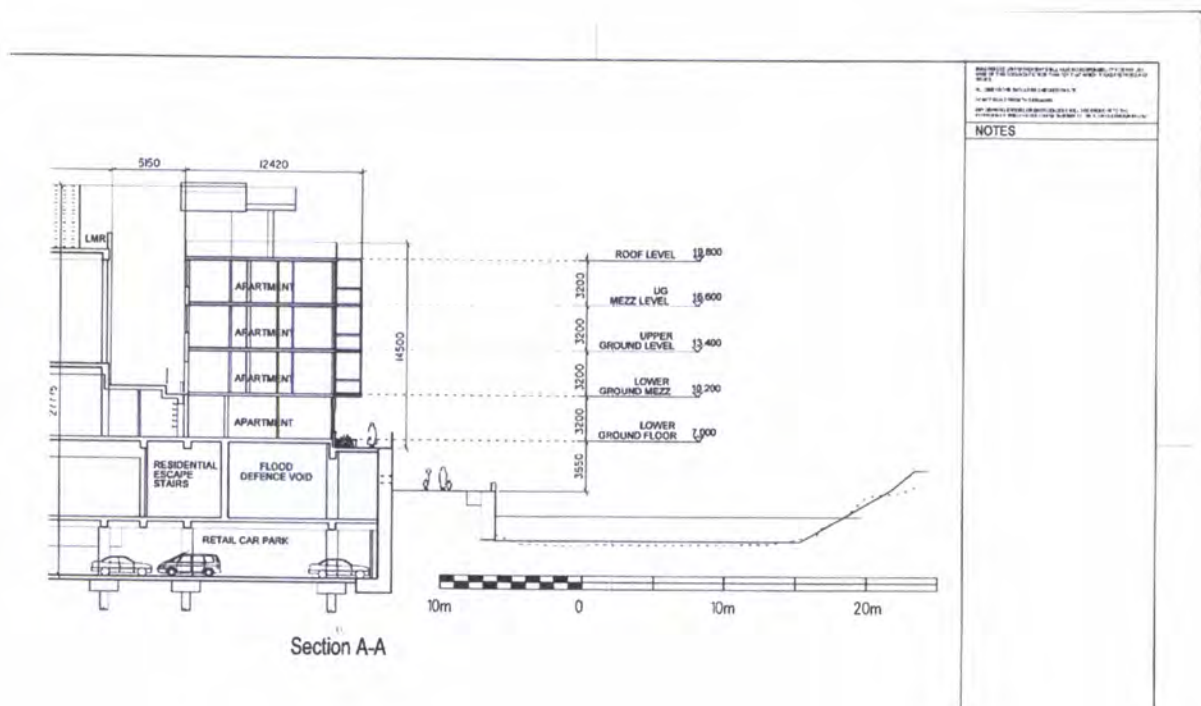
**Figure 5: from Pizarro's 1<sup>st</sup> Application – proposal for the floodplain:**



**To contain:**

- 603 residential units comprising 90 one-bed apartments, 292 two-bedroom apartments, 192 three bedroom apartments, 24 two bedroom duplex units and 5 three bedroom duplex units;
- Retail development with a GFA of c.57,967 sq.m (excluding storage) and office floor space totalling 5,797 sq.m GFA;
- An 8 screen cinema complex;
- A 103 bedroom hotel;
- 6 bars;
- 11 restaurants;
- 2 crèches;
- And various ancillary buildings, along with
- 3,591 no. car parking spaces.

**Figure 6: from Pizarro's 2<sup>nd</sup> application:  
the 'flood defence void' is replacing an 8.6 acre floodplain:**



Some car parking spaces were lost to this flood void, but there were very little changes in the number of units to be built.

## **Figure 7: the Justification Test:**

### **Box 4.1: Justification Test for development plans:**

(page 37 of 'Planning System and Flood Risk Guidelines for Planning Authorities')

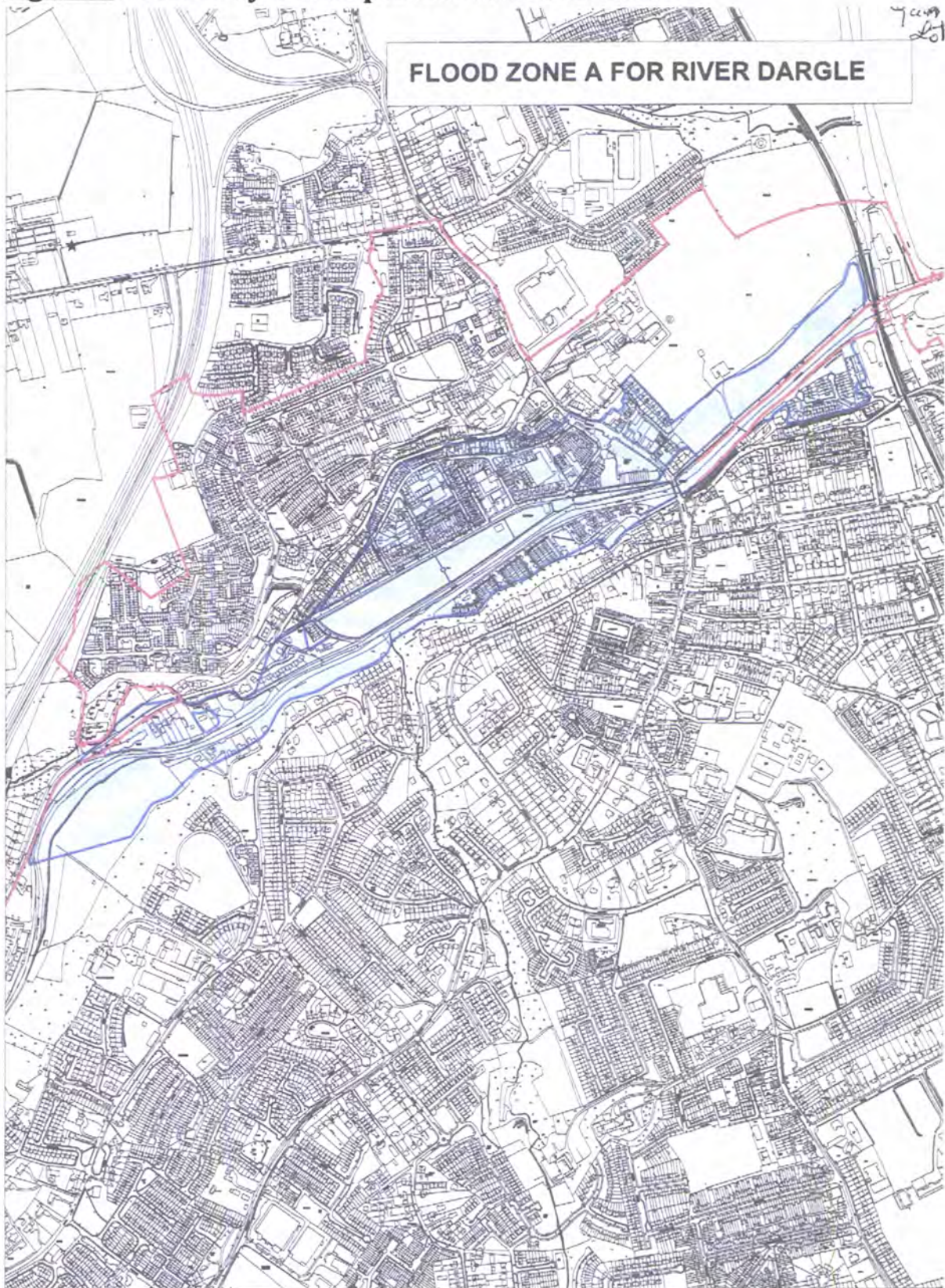
Where, as part of the preparation and adoption or variation and amendment of a development/local area plan, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:



1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
  - i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
  - ii. Comprises significant previously developed and/or under-utilised lands;
  - iii. Is within or adjoining the core of an established or designated urban settlement;
  - iv. Will be essential in achieving compact and sustainable urban growth; and
  - v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.



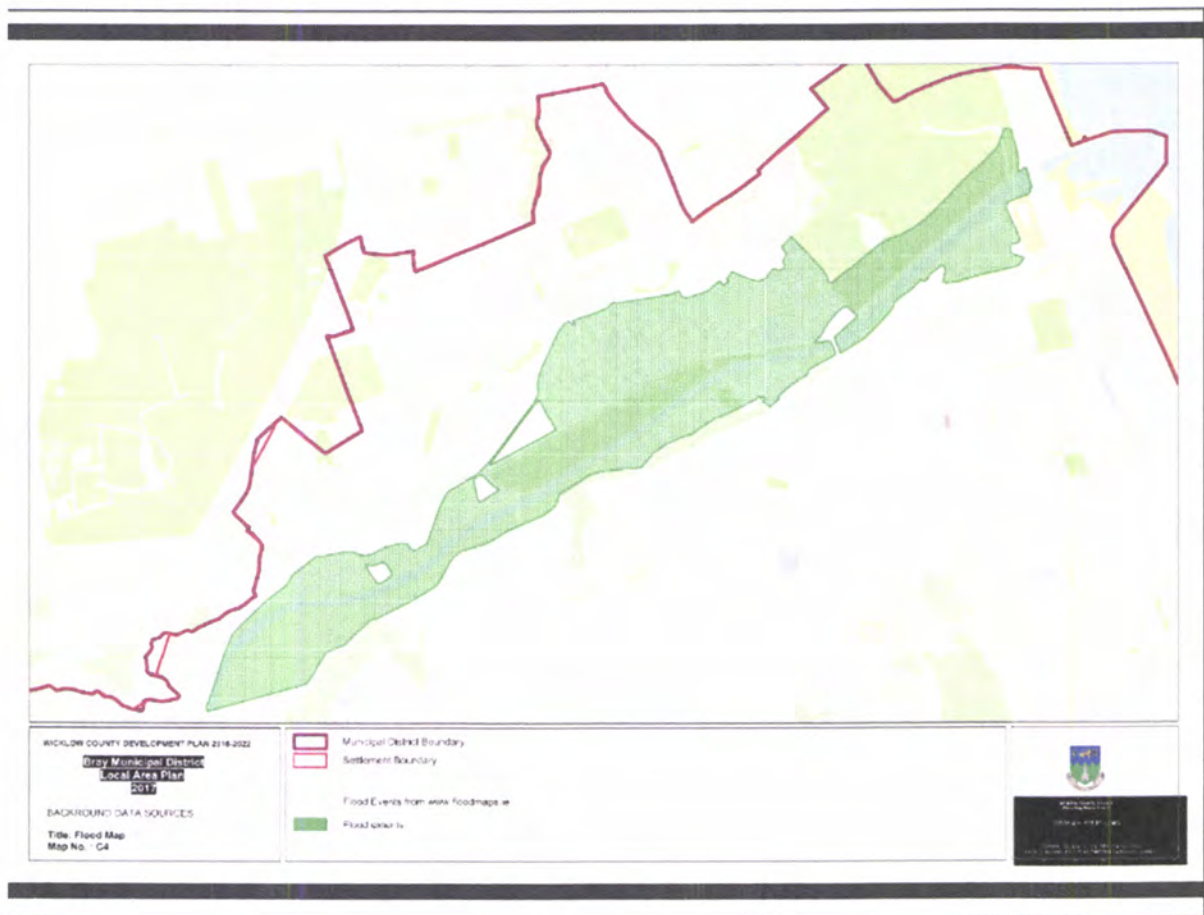
**Figure 8: from Bray Development Plan 2011-2017:**



	<b>BRAY TOWN DEVELOPMENT PLAN 2011 - 2017</b> <b>MAP NO. 16</b>		Scale:	1:11000
			Date:	8/2/11
<small>Ordnance Survey Ireland. All rights reserved. License Number 2010/35/CCMA/WicklowCountyCouncil</small>				



**Figure 9: Map no C4 from Bray's Draft LAP 2017:**



**Figure 10: detail from Map SFRA 1 from Bray's Draft LAP 2017:**







WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

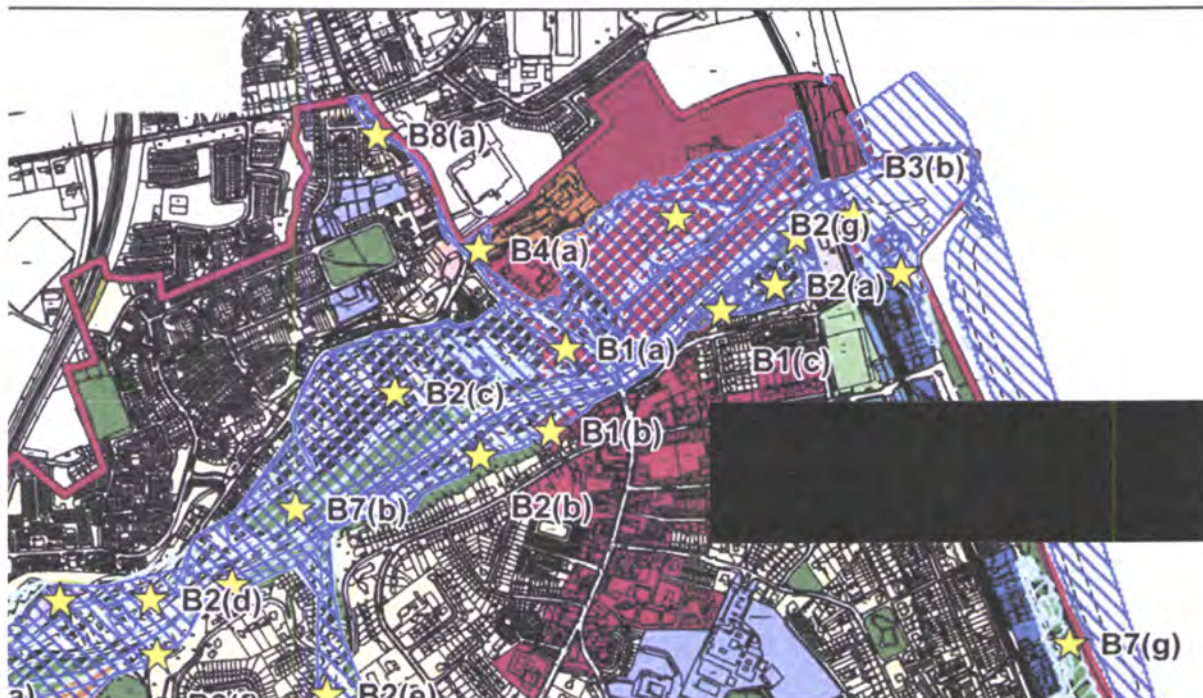
**Bray Municipal District  
Local Area Plan  
2017**

STRATEGIC FLOOD RISK ASSESSMENT

Title: Indicative Flood Zones  
Map No. : SFRA1

- |   |  |
|---|--|
|  | Municipal District Boundary                    |
|  | Settlement Boundary                            |
|  | FLOOD ZONE A: High probability of flooding     |
|  | FLOOD ZONE B: Moderate probability of flooding |

**Figure 11: detail from Map SFRA 2(a) from Bray's Draft LAP 2017:  
(apologies - we couldn't get this to display fully on-screen)**



WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022 <b>Bray Municipal District</b> Local Area Plan 2017 <b>DRAFT</b>		TC Town Centre VC Village Centre LSS Local Shops & Services E Employment E Special Employment FI Film Industry T Tourism MU Mixed Use		AOS Active Open Space OS1 Open Space OS2 Open Space SF Bray Seafront GTH Bray Gateway & Transport Hub KD Kilruddery Demesne Conservation & Tourism Zone PU Public Utility CE Community & Education		FLOOD ZONE A FLOOD ZONE B SITES Conservation Area Bray Head SAAO	
STRATEGIC FLOOD RISK ASSESSMENT SITES Title: Bray Town and Environs Map No. : SFRA2 (a)		Municipal District Boundary Settlement Boundary RE Existing Residential R-HD New Residential R20 New Residential R15 New Residential R10 New Residential R Special New Residential	TC Town Centre VC Village Centre LSS Local Shops & Services E Employment E Special Employment FI Film Industry T Tourism MU Mixed Use	AOS Active Open Space OS1 Open Space OS2 Open Space SF Bray Seafront GTH Bray Gateway & Transport Hub KD Kilruddery Demesne Conservation & Tourism Zone PU Public Utility CE Community & Education	FLOOD ZONE A FLOOD ZONE B SITES Conservation Area Bray Head SAAO		



**Figure 12:**

**Houses at Ravenswell Row, Maitland St., Ardee St., and Sunbeam's 'Villa Marie':**





**Figure 12 (contd.)**



**Leonora Earls**

---

**From:** MR ALAN TAYLOR  
**Sent:** 15 September 2017 12:22  
**To:** Planning - Plan Review  
**Subject:** Re;Submissions on Draft Bray Local Area Plan 2017.  
**Attachments:** Scan0007.pdf

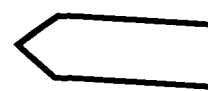
Dear Sir/Madam,

I attach for your attention a submission by Mr Thomas Taylor concerning proposals in the draft Bray Local Area Plan 2017-2023 to rezone lands at the rear of Charnwood, Vevay Road, and Giltspur Wood for residential development and also wish to make the following observations.

The subject lands are presently zoned for open space purposes and were for zoned for such purpose to protect the amenities of both adjoining housing estates (Charnwood and Giltspur Wood). It appears that the owners of the subject lands were the original owners of the lands upon which Charnwood and Giltspur Wood were built and the lands were obviously zoned and rezoned in Development Plans over the years for open space use to protect local residential amenity. The fact that the lands have been not in active use or properly maintained should not be a consideration for rezoning. Wicklow County Council should have acquired these lands for active recreational use but now propose to rezone the lands for housing development that will adversely affect local amenities due to the loss of open space and by way of increasing local traffic on a road network that is virtually at gridlock during daytime hours. The obvious and only beneficiary of the proposed rezoning will be the land owner as the value of the lands will increase tenfold.

Yours faithfully,

Ann Taylor.



**Leonora Earls**

---

**From:** Bradshaw, Simon [mailto:simon.bradshaw@gva.ie]  
**Sent:** 15 September 2017 16:48  
**To:** Planning - Plan Review  
**Subject:** Submission on Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** 170915\_Tesco Ireland submission on the Draft Bray Municipal District Loc...pdf

To whom it may concern,

Please see attached a submission by GVA Planning, Second Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2 made on behalf of Tesco Ireland, Gresham House, Marine Road, Dun Laoghaire, Co. Dublin. This submission relates to the Draft Bray Municipal District Local Area Plan 2017.

We would be grateful if you could respond to acknowledge receipt of this email and should you have any queries with regard to the attached document please don't hesitate to contact us.

Kind regards,

Simon.

**Simon Bradshaw**  
Senior Planner

**GVA**

T +353 (0)1 661 8500 , +353 (0)86 045 6079  
[simon.bradshaw@gva.ie](mailto:simon.bradshaw@gva.ie) | [www.gva.ie](http://www.gva.ie)

2<sup>nd</sup> Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2.

---

**GVA**

an **APLEONA** company



GVA Planning is the trading name of GVA Planning and Regeneration Limited registered in the Republic of Ireland under company number 409687. Our registered office is at Second Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2. Directors of the Company: Robert McLoughlin, Gerard Hughes (British), Stephen Brown (British), Sebastian Happel (German). GVA Planning and Regeneration Limited is an Apleona company.

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An **APLEONA** company

15<sup>th</sup> September 2017

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

To whom it may concern,

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

This submission has been prepared by GVA Planning, 2nd Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2, on behalf of Tesco Ireland Ltd., Gresham House, Marine Road, Dún Laoghaire, Co. Dublin in response to the publication of the Draft Bray Municipal District Local Area Plan 2017 (hereafter Local Area Plan). Tesco, being a recognised part of the retail environment in Bray welcomes the opportunity to make a submission on the proposed Local Area Plan.

The retail sector makes a major contribution to Bray, increasing vitality and viability as well as providing an economic anchor for the town. We are encouraged by the inclusion of policies in the Local Area Plan which provide support for retail and commercial operators. The continued reference to the Vevay Road Neighbourhood Centre and its role in providing essential services to Bray, as detailed in the Retail Strategy that forms part of the Wicklow County Development Plan 2016-2022, is particularly welcome.

The publication of the clarification document which was issued on 21<sup>st</sup> August 2017 is also welcomed, as this document includes the objective, description and location of the Neighbourhood Centre zoning, as well as outlining the uses that are generally considered appropriate. We would request that this clarification is included as part of the final Local Area Plan. It is, however, submitted that Wicklow County Council should review how this clarification was published and if the material alteration mechanism needs to be used to ensure that the contents of the clarification document are included in the final plan, in compliance with the requirements and procedures of planning legislation.

Should Wicklow County Council have any queries with regard to the documents outlined above please do not hesitate to contact us.

Yours sincerely,

**Simon Bradshaw**

**Senior Planner**

**+353 (0)1 661 8500**

**For and on behalf of GVA Planning and Regeneration Limited**

**GVA Planning**

2nd Floor Seagrave House  
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**gva.ie**

GVA Planning is the trading name of GVA Planning and Regeneration Limited registered in the Republic of Ireland number 409687. Registered office, Second Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2.  
Directors of the Company: Robert McLoughlin, Gerard Hughes (British), Stephen Brown (British), Sebastian Happel (German).

GVA Planning and Regeneration Limited is an Apleona company.



**Leonora Earls**

---

**From:** LA Thomson [le...@gmail.com]  
**Sent:** 14 September 2017 00:54  
**To:** Planning - Plan Review  
**Subject:** Submission against Draft Bray LAP Killruddery Rezoning  
**Attachments:** Draft Bray LAP Submission\_Thomson\_20170913.pdf

Please find attached our Submission against the Draft Bray Municipal Local Area Plan 2017 regarding Rezoning of Killruddery Demesne.

Regards  
Neal & Lesly Thomson  
37 Swanbrook  
Southern Cross Road  
Bray  
Co. Wicklow

Neal & Lesly Thomson  
37 Swanbrook  
Southern Cross Road  
Bray  
Co. Wicklow

PI

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

13 September 2017

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

Dear Sir/Madam

We would like to highlight our serious concerns regarding the proposed rezoning of a substantial portion of land in the Killruddery Demesne and we strongly object to this proposed rezoning on the following grounds:

**Loss of Natural Environment:**

We believe this is an inappropriate development on lands of outstanding natural beauty. We urge Wicklow County Council to implement the 2008 Ministerial Special Amenity Area Order (SAAO) for the Great and Little Sugarloaf Mountains in order to protect the Sugarloaf areas from development.

**Housing Density:**

We are concerned by the increase in residential density now being proposed. This higher density will bring in larger numbers to the area, increasing traffic volumes on the already heavily trafficked Southern Cross Road and on the narrow overburdened connecting road network. We are also aware of a number of houses in the Hollybrook area being prone to flooding and an additional 240 houses could increase this flood risk. We would like to see an "Environmental Impact Statement" (EIS) carried out.

**Access:**

We are concerned about the lack of information identifying access to the proposed residential and industrial areas. It is unclear whether this is proposed to come through the existing residential areas, or separate access. Firstly we feel that access via the existing cul de sac estates is totally unacceptable. Secondly we are opposed to vehicular access to the residential development via the existing entrance within Killruddery demesne, and if such access is proposed, it highlights the need for the buffer zone to be widened significantly due to increased traffic volume and noise levels to the rear of the existing houses. We feel that the issue of access should be addressed at this stage and any proposal to increase traffic through our estates is strongly objected to.

**Lack of Infrastructure/Amenities:**

At present there are already concerns in relation to the lack of services on the Southern Cross Road, i.e. no local amenities, retail outlets, playgrounds or green areas, and limited public transport. This limited infrastructure cannot support the proposed housing and industrial development.

**Increased Industrial Zoning in the Area:**

We question why there is a need to increase the industrial zoning in this area when there are so many derelict and neglected commercial sites already within Bray. Before creating new sites, these existing sites should be considered for upgrading rather than leaving them to become areas of antisocial behaviour.

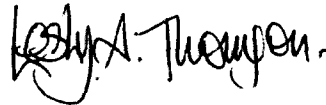
Thank you for taking the time to review these points raised and we hope that you will seriously consider our concerns before any decision is made regarding new zoning on Killruddery Estate.

Yours faithfully



---

**Neal Thomson**



---

**Lesly Thomson**

Leonora Earls

---

**From:** Peter Thomson [p...@planning-solutions@eircom.net]  
**Sent:** 11 September 2017 08:47  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Municipal Local Area Plan 2017 submission  
**Attachments:** Draft Bray LAP submission.pdf

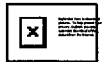
Please find attached a submission to the Draft Bray LAP. I would be grateful if you would keep me updated.

Regards,

Peter Thomson

Peter Thomson Planning Solutions,  
4 Priory Grove,  
Kells,  
County Kilkenny.

T



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Director of Services,  
Wicklow County Council,  
County Buildings,  
Whitegates,  
Wicklow.

7 September 2017.

**Re: Draft Municipal District Local Area Plan for Bray 2017  
Submission in respect of The Carlisle Grounds, Quinsborough Road, Bray,  
County Wicklow.**

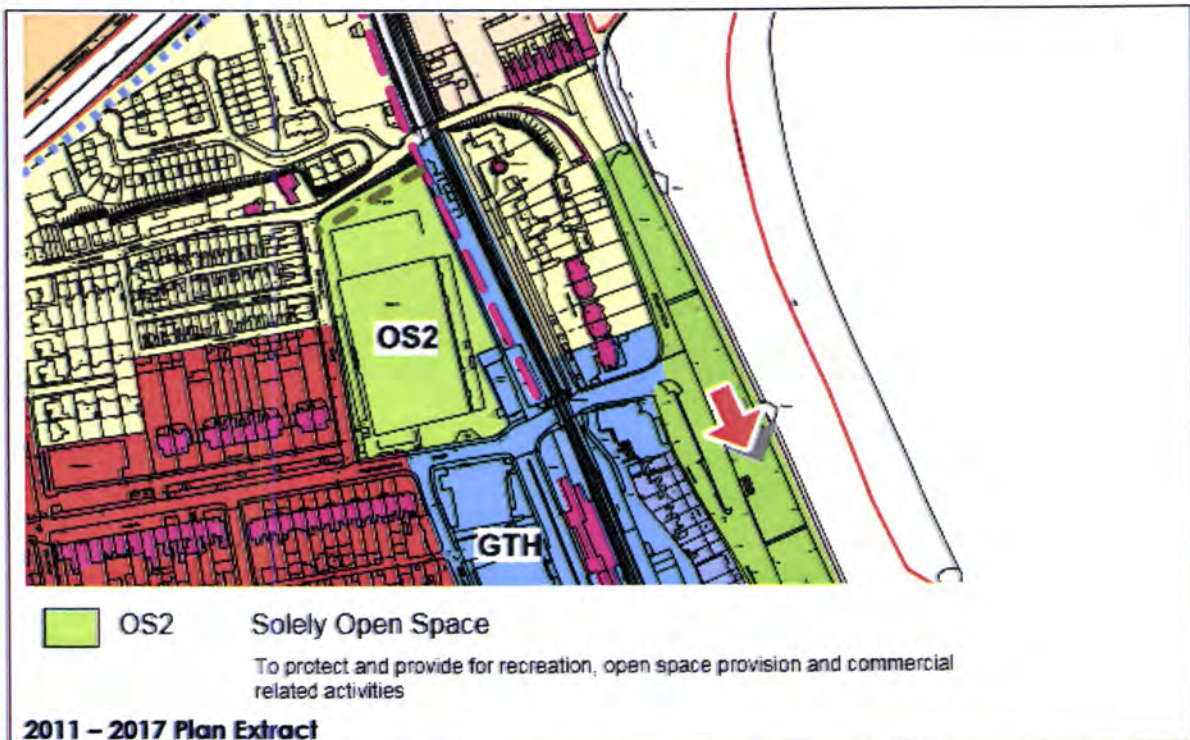
Dear Sir/ Madam,

**Introduction**

I act for Rory Benville, 14 King Edward Lawn, Bray, Co Wicklow who has an interest in the preservation of The Carlisle Grounds, Bray; a sports ground built in Victorian times in a Victorian quarter of Bray Town.

**Current Development Plan**

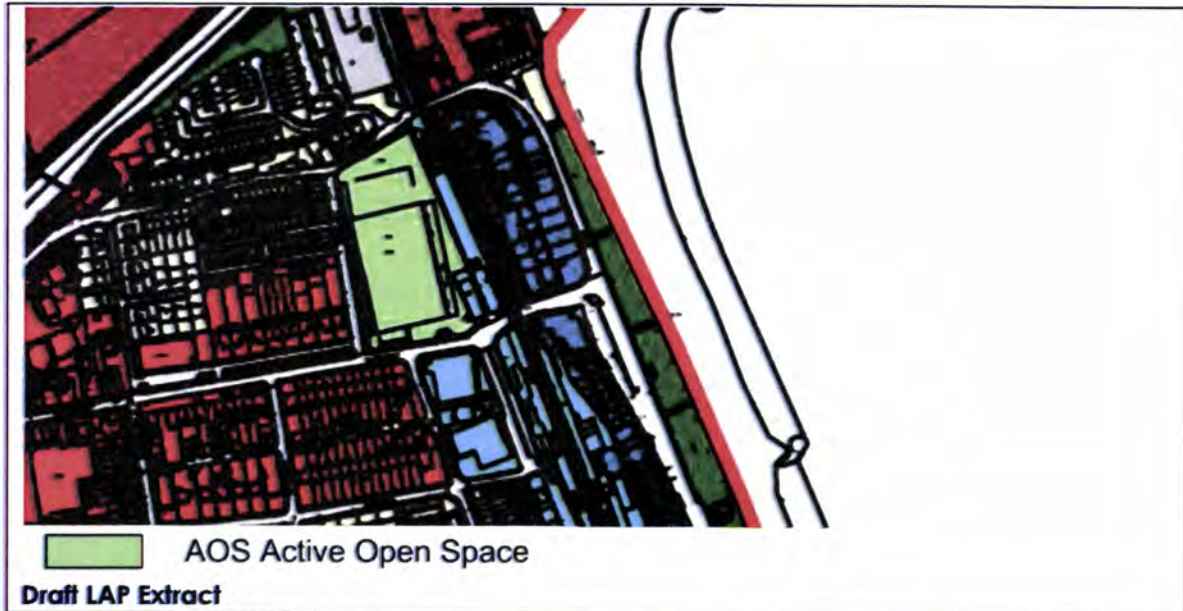
**Bray Development Plan 2011 to 2017** - The current development plan is the Bray Development Plan 2011 to 2017. In the Plan the Carlisle Grounds site is zoned "Solely Open Space" – "*To protect and provide for recreation, open space provision and commercial related activities*".





It is stated in the Plan that it is the policy of the Council to protect, enhance and maintain existing open space. The Council will not normally permit development that will result in the loss of public or private playing fields, parks, children's play space, amenity open space or land zoned for recreational or open space purposes.

**Draft Bray Municipal District Local Area Plan 2017** – In The Draft LAP it is proposed that The Carlisle Grounds retain its open space zoning. The proposed specific designation is "Active Open Space" - *To protect and enhance existing and provide for new active open space*".



This zoning is designed to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for their development.

### **Observations**

My client fully welcomes the Council's continual support for the retention of The Carlisle Grounds in Bray as a major sporting venue.

Bray Wanderers have a current lease on the grounds from Wicklow County Council.

There has been considerable press coverage and speculation in recent times of the intentions of the Bray Wanderers owners to have the site re zoned to permit residential development for sale and rental on the site and for the club to relocate to the periphery of Bray<sup>1</sup>.

<sup>1</sup> Irish Star 3 August 2017 – Grounds for Move - Bray Wanderers outline how club will be financed through sale of apartments and rental income

Irish Independent – 3 August 2017 - Apartments Plan for Bray Wanderers

It would be most unfortunate if Bray Wanderers elected to relocate but that is their prerogative if they have the capacity to terminate the current lease with Wicklow County Council and have a suitable alternative site to relocate to. That is not reason for the current sporting and recreational use of the site to cease or for the zoning to change. The site can be leased to others, if necessary.

The Draft LAP adopts the Core Strategy of the current County Development Plan 2016 to 2022 in respect of housing land supply. The amount of zoned land identified in the Draft LAP is consistent with the County Development Plan. While the LAP will have a life to 2023, sufficient residential zoning has been provided for population and housing projections to 2025. This zoning includes "headroom" to allow for greater location choice and to deal with any land supply inflexibility which may arise.

The existing Carlisle Grounds are therefore not required for housing and, if zoned for such a use, would either create an oversupply of housing land that is not consistent with the County Development Plan or require the County Development Plan to be amended in advance of the LAP being amended and adopted.

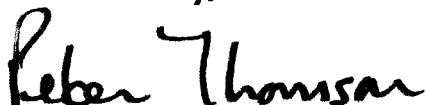
The Carlisle Grounds are ideally accessible to all. Much of the town's population can access them on foot and bike and public transport connections are excellent, including proximity to the Dart/ Rail line and access to bus services. Road connections are also good and town centre parking plentiful. Indeed, as noted by the Director of Services in a recent planning report in respect of planning application 17/811, The Carlisle Grounds itself has a role to play in town centre parking provision.

In recent times The Carlisle Grounds have undergone improvements and now have capacity for around 7000 supporters, almost half of which can be seated. In addition to the facility being home to Bray Wanderers it has also hosted a number of other significant sporting events including UEFA Regions' Cup matches and international rugby league matches. The potential exists for further improvements to increase the attraction of the facility as a major sporting venue in the heart of Bray. This will only be achieved if the proposed zoning is retained.

#### **Conclusion**

The Planning Authority is requested to maintain the current zoning of The Carlisle Grounds as Active Open Space.

Yours faithfully,



Peter Thomson

**Leonora Earls**

---

**From:** Kay Tighe [k@...]  
**Sent:** 14 September 2017 22:04  
**To:** Planning - Plan Review  
**Subject:** Submission regarding Sugarloaf

To Wicklow County Council,

I object to the proposed roadway and re-zoning of lands on the lower slopes of Little Sugar in Kilmacanogue on the following grounds:

1. The proposal is contrary to the vision and goals as laid out in the Wicklow County Development Plan 2016-2022. This proposal would destroy what is deemed as an Area of Outstanding Natural Beauty (AONB).
2. In 2008 a ministerial order was made to grant a Special Amenity Area Order (SAAO) for the Great and Little Sugarloaf Mountains. This order was ignored and not implemented by Wicklow County Council. I request that an objective be included in the Bray Local Area Plan to create an SAAO for the Great and Little Sugarloaf Mountains.
3. The destruction of the green belt would ultimately lead to the subsuming of Kilmacanogue into the greater area of Bray. This I would be detrimental to the village distinction of Kilmacanogue. This is contrary to the vision and goals laid out in the WCDP.
4. The area proposed for re-zoning is an essential amenity, not just locally but the thousands of walking and trekking group visitors who use it throughout the year. This is again contrary to the vision and goals laid out in the WCDP.
5. The roadway proposed by the Council is superfluous to needs and It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible, and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.

I believe this proposal reflects an extraordinary lapse of judgement on the part of Wicklow County Council, and must be removed in its entirety from both the Wicklow County Development Plan 2016-2022, and the Bray/ Kilmacanogue Local Area Plan 2017-2023.)

Tighe Family Kilmacanogue  
Sent from my iPhone



C277

**Leonora Earls**

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**From:** Helena Gavin [  
**Sent:** 14 September 2017 18:13  
**To:** Planning - Plan Review  
**Subject:** RPS TIO SUBMISSION BRAY MD LAP  
**Attachments:** RPS TIO SUBMISSION MH16010 BMDLAP F01 14092017.pdf

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

Please find attached our submission to the Bray Municipal District Local Area Plan 2017-2023 on behalf of our client TIO.

I would be grateful if you could acknowledge receipt of this submission by return email.

Kind regards  
Helena

---

Helena Gavin BA, MSc Town & Country Planning, PG Dip EnvEng, MIPI  
Director Planning - RPS  
West Pier Business Campus,  
Dun Laoghaire, County Dublin.  
Ireland  
**Tel:** +353 (0) 1 488 2900  
**Direct:** +353 (0) 1 709 8029  
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**www:** [www.rpsgroup.com/ireland](http://www.rpsgroup.com/ireland)

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RPS

# Submission to Draft Bray Municipal District Local Area Plan 2017-2023

Formal Submission to Wicklow County Council  
on behalf of  
TIO ICAV (TIO)

MH16010 September 2017





# Submission to Draft Bray Municipal District Local Area Plan 2017-2023

## Document Control Sheet

Client:	TIO ICAV (TIO)		
Project Title:	Submission to Draft Bray Municipal District Local Area Plan 2017-2023		
Document Title:	Submission to Draft Bray Municipal District Local Area Plan 2017-2023		
Document No:	F01		
Text Pages:	20	Appendices:	1

Rev.	Status	Date	Author(s)	Reviewed By	Approved By
D01	Draft	5 <sup>th</sup> Sept 2017	MC	LK	HG
D02	Draft	14 <sup>th</sup> Sept 2017			HG
F01	Final	14 <sup>th</sup> Sept 2017			HG <i>Heldur Sigur</i>

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## EXECUTIVE SUMMARY

RPS Group Ltd, West Pier Business Campus, Dun Laoghaire, County Dublin has been instructed by our client TIO ICAV (TIO), to make this formal submission to the Bray Municipal District Draft Local Area Plan 2017-2023. TIO has been active in the Irish market over the last number of years with strategic acquisitions of a range of development and investments opportunities which include Greystones Marina '*Marina Village*', Cois Glaisín in Navan, Holsteiner Park in Clonee and Herbert Hill in Dundrum. In this regard TIO has a proven track record in the delivery of quality residential development in Wicklow and the Greater Dublin Area. It is also highlighted that Bridgedale, a reputable housing development company, with TIO's support, is in the process of being acquired by Glenveagh Properties as a result of the forthcoming €450m Irish housebuilding IPO launch. This further confirms the credibility to the skills and resources available in the delivery of sites for residential development.

Our client is the owner of lands of c.9.8 hectares of lands which were zoned in the Rathdown District Plan no. 2 to accommodate 'E1' – employment land uses at Giltspur where large scale retail warehousing is identified as a '*normally permitted*' use and office is identified as an '*open for consideration*' use. Bray Retail Park is contained on c.5.8 hectares of this land holding. The balance of the zoned land (c.4 hectares) remains undeveloped.

Following a detailed review of the Draft Local Area Plan, it is noted that there is no reference to Retail Warehouse Uses however since the draft was placed on public display Wicklow County Council has issued a clarification confirming that the '*Retail Warehousing*' use was been omitted in error from the zoning table as published. The clarification states that this matter will be formally dealt with at the proposed amendments stage of the plan making process. Proposed Map No.2 Land Use Zoning indicates purple shading on our client's lands however the key does not indicate to what use this shading relates. For the purposes of this submission it is assumed that this shading is the '*E3: Retail Warehousing*' land use zoning objective referred to in the clarification issued by the Council.

Our client welcomes the zoning objective proposed reflecting existing retail warehousing uses on the site (Bray Retail Park) however submits that the range of uses which are acceptable on the zoning are too narrow. In this regard, our client is seeking that land uses listed as being acceptable within this objective is broadened to include office and other employment generating uses.

As noted above, Bray Retail Park is accommodated on c.5.8 hectares with the balance of the land holding remaining zoned but undeveloped. A review has been undertaken by our client to determine the potential uses appropriate to the subject lands location and context. Clearly the prolonged recession and imbalances in the housing market have resulted in a critical shortfall in well-designed housing located in appropriate locations – close to existing transport links, infrastructure and social infrastructure. As a result of our client's review, this shortfall, the character of the site and servicing infrastructure currently in place, it is proposed that the undeveloped lands adjacent to the existing retail park be considered to accommodate residential uses. Planning permission on the site (planning reg. ref. 08/811) confirms the site's ability to absorb development at this location. The character and setting of the site is in our view more akin to a residential development and provides readily available serviced land in a sustainable location proximate to existing services and infrastructure. This site can be delivered immediately by a reputable developer subject to it being designated with the appropriate zoning objective.



This submission provides a detailed policy based justification for these changes. In summary our client requests the following amendments to the Bray Municipal District Draft Local Area Plan 2017-2023.

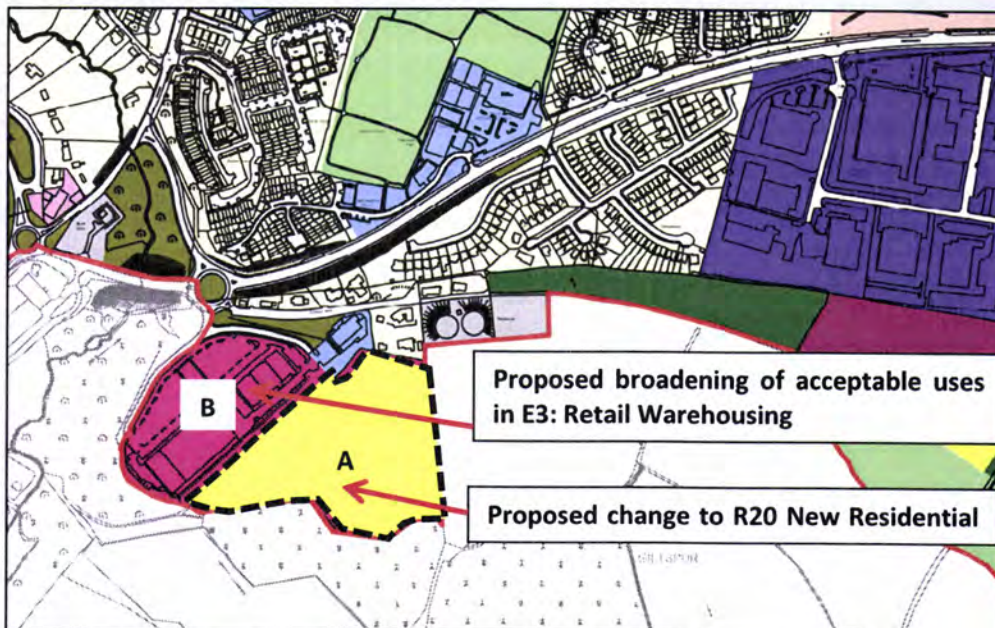
For the undeveloped zoned lands located to the south east of Bray Retail Park (A) our client seeks:

**A change from 'E3: Retail Warehousing' to 'R20: New Residential'- 'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities'.**

For the existing Bray Retail Park lands (B) our client welcomes the proposed 'E3: Retail Warehousing' zoning objective and seeks:

**The range of uses acceptable under the proposed 'E3: Retail Warehousing' zoning objective be broadened to include office and other employment generating uses.**

#### Proposed land use zoning changes



Our client respectfully requests that the suggestions and recommendations made herein are considered and taken into account by Wicklow County Council in the finalisation of the Bray Municipal District Local Area Plan.

We would also like to confirm that our client would welcome the opportunity to give any further information, access to the site or detail in respect of this submission to the planning authority.



# 1 INTRODUCTION

RPS Group Ltd., West Pier Business Campus, Dun Laoghaire, County Dublin has been instructed by our client, TIO, 25 – 28 North Wall Quay, Dublin 1, to make this formal submission to Wicklow County Council in response to the request for submissions or observations relating to *Bray Municipal District Local Area Plan 2017-2023* (Draft BMDLAP) during the public consultation period from 2<sup>nd</sup> August 2017 to 15<sup>th</sup> September 2017.

This submission is structured as follows:

**Section 1** – Introduction

**Section 2** – Context of lands within policy framework

**Section 3** – Consideration of the Draft BMDLAP

**Section 4** – Indicative development strategy for subject lands

**Section 5** – Recommendations and conclusions.

## 1.1 ABOUT TIO

TIO has a proven and strong track record in delivering high quality housing and has been active in the Irish market over the last number of years with strategic acquisitions of a range of development and investments assets which include Greystones Marina '*Marina Village*', Cois Glaisín in Navan, Holsteiner Park in Clonee and Herbert Hill in Dundrum. In this regard TIO has a proven track record in the delivery of quality residential development in Wicklow and the Greater Dublin Area.

The Marina Village in Greystones was achieved through a public-private partnership between Wicklow County Council, Bridgedale, Sisk and our client. Marina Village is a waterside residential location which features approximately 358 architecturally designed A-rated homes and the creation of a coastal 5.7 hectare park on the north shores of the development. Marina Village received multiple awards in 2016 including the '*Panasonic PRO*' award for best European residential project and the '*KPMG Irish Independent Property Industry Excellence Awards for Community Benefit Award*'. The development was also shortlisted for the '*Irish construction Industry awards Residential*' project of the year 2017. It is also highlighted that Bridgedale, a reputable housing development company, with TIO's support, is in the process of being acquired by Glenveagh Properties as a result of the forthcoming €450m Irish housebuilding IPO launch. This further confirms the credibility to the skills and resources available in the delivery of sites for residential development. It is confirmed therefore that our client has excellent experience in respect of realising development, in particular, high quality residential sites.

## 1.2 PURPOSE OF SUBMISSION

Overall the preparation of the Draft BMDLAP by Wicklow County Council is welcomed and supported by our client. The amalgamation and streamlining of the existing statutory plans for the Bray area will assist in providing a coherent framework and co-ordinated approach to the sustainable development of the area.



Our client is the owner of c.9.8 hectares of developed and undeveloped land at and adjacent to Bray Retail Park, Southern Cross Road, just off the N11 to the south west of Bray town centre. This landholding is outlined in red in **Figure 1.1**.

Since the draft was placed on public display Wicklow County Council has issued a clarification confirming that 'E3: Retail Warehousing' use was been omitted in error from the zoning table as published. The clarification states that this matter will be formally dealt with at the proposed amendments stage of the plan making process. Proposed Map No.2 Land Use Zoning indicates purple shading on our client's lands however the key does not indicate to what use this shading relates. For the purposes of this submission it is assumed that this shading is the 'E3: Retail Warehousing' land use zoning objective referred to in the clarification issued.

Bray Retail Park is located on c.5.8 hectares while approximately 4 hectares of the site are currently undeveloped. Our client has reviewed the potential uses appropriate to the subject site, with regard to the recently adopted *Wicklow County Development Plan 2016-2022* (CDP) and in anticipation of the preparation of a new Bray Municipal District Plan. The purpose of this submission is to present a justification for the rezoning of our client's undeveloped lands to enable the delivery of residential uses, to welcome the proposed 'E3: Retail Warehousing' zoning objective on the Bray Retail Park site recognising existing uses and to request that the land uses permitted within the 'E3: Retail Warehousing' zoning objective be broadened to include office and other employment uses.

**Figure 1.1** Subject lands at Southern Cross



### 1.3 SITE CONTEXT

The overall subject site comprises a successful retail park and crèche and approximately 4 hectares of undeveloped zoned lands. The retail park is anchored by Woodies DIY and includes other retail warehouse operators such as DID Electrical, Flanagan Kerins, Harry Corry, House of Tiles and Maxi Zoo. The Park Academy crèche is located within our client's lands with access gained from the retail park. The site is accessed from the roundabout on the Southern Cross Road, which links to the N11/M1 Motorway.

Existing residential areas are located some 120m to the north east of the subject site at Deepdales. Giltspur Lane located immediately to the north of the site includes some residential development. Additional residential areas are located a further 150m to the north at Ballywaltrim Grove. A number of educational facilities are located within 1 mile of the subject site including 2 no. primary schools (Bray School Project National School and Saint Fergal's Junior National School) and 1 no. secondary school (St. Kilian's Community School). Further to the east along the Southern Cross Road, there is a substantial area of commercial lands at Bray Business Park and further residential areas. Kilruddery Demesne East and West are located to the south and east of the subject lands towards the Southern Cross and the R761 which connects Bray to Greystones. The pedestrian infrastructure in the surrounding area is generally very good, with dedicated footpaths on the Southern Cross Road to the north east and footpaths and cycle lanes on Killarney Road to the north west.

### 1.4 PLANNING HISTORY

The retail park (comprising 4 no. retail warehouse units and ancillary garden centre) and crèche was granted planning permission in 2003 under Reg. Ref. 03/8197. The approved development included 503 no. public car parking spaces and 31 no. staff car parking spaces. Access via a new roundabout to the subject site was granted under Reg. Ref. 01630090 by Bray Town Council. An additional 2 retail warehouse units were granted under Reg. Ref. 07/2616 and the crèche unit under Reg. Ref 05/2652 by Wicklow County Council.

In January 2009, Wicklow County Council granted permission (Reg. Ref. 08/811) for the development of industrial and warehouse / distribution space units and associated offices on the undeveloped lands to the rear of the retail park. The permission was not implemented but confirms the site's ability to absorb development at this location.

## 2 CONTEXT OF LANDS WITHIN POLICY FRAMEWORK

### 2.1 NATIONAL PLANNING POLICY CONTEXT

The lands at Bray Retail Park are well positioned to adhere to sustainable development principles and with the policies and objectives for the delivery of sustainable housing, as detailed in the *National Spatial Strategy (NSS)* and in the *Regional Planning Guidelines for the Greater Dublin Area (RPG/GDA)*.

### 2.1.1 National Spatial Strategy (NSS)

While the NSS is due to be replaced by a new *National Planning Framework*, it still provides strategic guidance and objectives with respect to the sustainable provision of housing in urban areas. These include:

- Concentration of development in locations where it is possible to integrate employment, community services, retailing and public transport.
- Mixed-use and well-designed higher density development, particularly near town centres and public transport nodes.
- The efficient use of land by consolidating existing settlements, focusing in particular on development capacity within central urban areas through re-use of under-utilised land and buildings as a priority, rather than extending green field development.

The strategy sets out a following broad evaluation framework to assess the most appropriate spatial locations for housing land. An evaluation of our client's undeveloped land against these tests is provided in **Table 2.1** below.

**Table 2.1 Evaluation framework to assess locations for housing land**

Test	Objective	Subject Lands
The Asset Test	<i>Are there existing community resources, such as schools etc., with spare capacity?</i> The subject lands are located within easy access of local schools, childcare facilities (including the existing crèche located adjacent), a leisure centre and sports fields.	✓
The Carrying Capacity Test	<i>Is the environmental setting capable of absorbing development in terms of drainage etc.?</i> The proposed development of these lands for residential use can be readily absorbed into its setting and is capable of being connected to local wastewater services.	✓
The Transport Test	<i>Is there potential for reinforcing usage of public transport, walking and cycling?</i> There are 2 no. Dublin Bus services located close by (84X and 145). The 145 provides a high frequency service (i.e. every 10 minutes between 7:00 and 21:00 Monday – Friday) from Ballywaltrim to Heuston train station via Bray town centre, Shankill, Cabinteely, Stillorgan, Donnybrook and Dublin City Centre.	✓
The Economic Development Test	<i>Is there potential to ensure integration between the location of housing and employment?</i> The overall landholding of our client includes the Bray Retail Park which provides employment opportunities; further local employment opportunities are located at the IDA Business Park north east of the subject site.	✓
The Character Test	<i>Will the proposal reinforce a sense of place and character?</i> Characteristics of the subject site which includes a high quality green infrastructure resource will enable the proposal to provide and reinforce a strong sense of place and character	✓

**Table 2.1: Evaluation framework to assess locations for housing land (continued)**

<b>Test</b>	<b>Objective</b>	<b>Subject Lands</b>
<b>The Community Test</b>	<p><i>Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?</i></p> <p>A proposed NC Neighbourhood centre is indicated on the Draft BMDLAP zoning maps within close proximity to the subject lands. There are also existing retail outlets in close proximity to the site. Furthermore the site is close to childcare, primary and post primary education facilities.</p>	✓
<b>The Integration Test</b>	<p><i>Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?</i></p> <p>An indicative scheme has been prepared for the site and it is submitted that the site can accommodate a distinctive residential development, which achieves a personal identity while integrating with and contributing to the local services and facilities. Rezoning the site for residential development will lead to the provision of housing to meet a housing need for families, an element of which will cater for social housing as per the developers Part V obligation.</p>	✓

It is clear the subject lands satisfy the evaluation framework for residential sites.

### 2.1.2 Regional Planning Guidelines

Within the GDA, a distinction is made in the guidelines between the Metropolitan Area (existing built up area of Dublin and its immediate environs) and the Hinterland Area. Bray is located in the Metropolitan Area and is classified as a Metropolitan Consolidation Town (MCT) in the settlement hierarchy. Such towns are described as a 'strong active urban place within the metropolitan area with strong transport links'. The settlement strategy for the GDA aims to:

- Physically consolidate the growth of the metropolitan area of Dublin by focusing new housing within the existing footprint of the metropolitan area and planning expansion of the footprint in conjunction with new high quality public transport investment; and
- To concentrate development in the hinterland into designated towns, along multi-modal transport corridors providing enhanced public transport linkages.

According to the RPG/GDA, MCTs, such as Bray, are located close to Dublin City and function as part of the Gateway. The RPG/GDA state that MCTs should continue to be developed 'at a relatively large scale as part of the consolidation of the metropolitan area,' and to continue to support key public transport corridors connecting these locations to the city, each other and the Large Growth Towns in the hinterland. The RPG/GDA highlight that towns such as Bray:

*'should assess, specify and plan for the long term growth of these centres - up to 100,000 population, to take place over a series of Development Plans, so that the planning of new infrastructure fully takes into account the long term growth role of*



*these centres; ensuring for the future the coordinated integration of all new services to serve future expansion.'*

It is important that the new LAP recognises Bray's key role as a MCT in the metropolitan area to help in achieving the economic and social development of the State. National policy encourages consolidation to ensure that land use and transportation are integrated. It is submitted that the consolidation of the existing development area of Bray needs to be achieved with the aim of reducing urban sprawl. It is important to ensure sufficient high quality housing is available at sustainable locations, with good infrastructure, services and amenities.

In order to help achieve the required level of consolidation in Bray, we put forward our client's undeveloped zoned lands adjacent to Bray Retail Park (which is within the development boundary of Bray). These lands are in close proximity to high quality public transport links, and meet the criteria (broad evaluation framework detailed in Table 2.1) for the location of residential development. In this regard our client requests that these lands be rezoned to accommodate residential uses.

#### **SUMMARY ON NATIONAL POLICY**

- Bray is designated as a Metropolitan Consolidation Town (MCT)
- Consolidation of land is promoted in MCTs and development is directed to within the existing footprint of the metropolitan area
- Development should be located in areas supported by sustainable modes of transport
- The subject lands satisfy the broad evaluation framework which assess the most appropriate spatial locations for housing land
- The subject lands will help to achieve the sustainable growth of Bray (particularly much needed high quality homes), being located within the development envelope of the town and in close proximity to existing public transport routes, community facilities and services.

## **2.2 LOCAL PLANNING CONTEXT**

### **2.2.1 Wicklow County Development Plan 2016-2022**

The CDP came into effect on 11<sup>th</sup> December 2016. Wicklow County Council is currently consulting on the proposed Variation No.1. The reasons for the proposed Variation comprise:

- the adoption of a new LAP for Rathdrum.
- the preparation of a new draft LAP for Arklow and environs.
- the preparation of a new draft LAP for the entire Bray Municipal District, which will encompass the settlements of Bray, Enniskerry, Kilmacanogue and their environs. The CDP includes the Level 5 and Level 6 plans for Enniskerry and Kilmacanogue. As the new LAP will update and subsume these plan areas, it is necessary to delete these plans from

the CDP and to allow these plans to be amended through the LAP, rather than CDP review process.

### 2.2.1.1 Core strategy

The core strategy contained in the CDP must be consistent with the RPG/GDA and the NSS. In this regard the CDP confirms that the delivery of new housing should be within the existing settlement boundaries of towns with growth primarily within the north east of the county (within the metropolitan area) where there is existing social infrastructure in place to serve new residential communities. Our client's landholding adjacent to the Bray Retail Park is well placed to take advantage of the existing social infrastructure in the vicinity.

According to the CDP the settlement strategy for the GDA aims to:-

*'physically consolidate the growth of the metropolitan area of Dublin by focusing new housing within the existing footprint of the metropolitan area and planning expansion of the footprint in conjunction with new high quality public transport investment.'* (chapter 2 page 6)

Our client's land adjacent to Bray Retail Park is located immediately to the south of the existing built footprint of Bray within the environs and is indicated for development. As such the lands are well placed to contribute to the overall housing need for Bray in the short to medium term.

The CDP outlines that the RPG/GDA require 42% of the total growth allocated to County Wicklow is located in the metropolitan area settlements. Table 2.4 of the CDP (Table 2.2 below) outlines population targets for Bray. Over the 17 year period, 2011-2028, there is a population target of some 10,661 for Bray, which equates to a 36% increase. Or to a per annum increase of some 627 persons. Variation No.1 of the CDP, as currently proposed, seeks to change the ultimate lifespan of the future BMDLAP to 2025 rather than the possibility of an extension to 2028. This is because between 2016 and 2022 the population targets for the county and Bray will be revised in light of the findings of Census 2016 and reflected in the new *National Planning Framework (NPF)* and the *Regional Spatial and Economic Strategy (RSES)*. Following this revision the targets contained in the LAP will be updated. In anticipation of this sequence of events, Wicklow County Council is of the view that the CDP should aim to meet the shorter term target (to 2025) to provide for sufficient zoned land to meet the 2023 population target plus 'headroom' of 2 years.

**Table 2.2 Population targets for Bray**

Designation	Town	2011	2022	2025	2028
Metropolitan Consolidation Town	Bray	29,339	36,237	38,119	40,000

Source: Wicklow County Development Plan 2016-2022

Our client supports the structure of Wicklow's settlement hierarchy, the preferred development strategy of the adopted CDP and the proposed Variation No.1. The development strategy is based on building strong urban centres while protecting the rural hinterlands and prioritises meeting the shorter and medium term goals. The CDP continues

with the emphasis on developing on serviced land within the metropolitan area of Wicklow - particularly Bray - which is at the top of the settlement hierarchy for the county as a MCT. Our client supports the proposed Variation No.1 of the CDP which seeks to ensure sufficient land to achieve the short to medium targets for development within the Bray Municipal District area.

### 2.2.1.2 Settlement strategy

According to the CDP, the population of Bray is anticipated to increase from 29,339 in 2011 to 38,119 in 2025 (i.e. the maximum lifetime of the future Draft BMDLAP). The CDP sets out that Bray is the largest town in County Wicklow located in a strategically important position within the metropolitan area and at the eastern gateway to the county. The town has the best transport links in the county, with access to the N/M11 transportation corridor (including M50), DART/ rail line and quality bus service. It is a strong active town that provides a higher order economic and social function for its local residents and for residents from other surrounding towns and villages. The CDP acknowledges that *'further expansion of the town is severely constrained on all sides by the administrative boundary of Dun Laoghaire Rathdown and the coast to the north and east, Bray Head / Sugarloaf mountains to the south and the N/M11 to the west'*.

In this regard, it is considered that our client's undeveloped zoned lands located to the south of the existing Bray Retail Park, provide an opportunity to allocate a future residential zoning to the lands as they are serviced, and located in proximity to public transport options and existing social infrastructure. It is our considered view that the conclusions in respect of the allocations of population as set out in the CDP and the physical constraints identified to the expansion of Bray, our client's lands are ideally placed to deliver much needed serviced land for housing – all in line with strategic policy.

The CDP outlines a number of settlement strategy objectives which include:

*“SS1 To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into the designated metropolitan growth centre and the large, moderate and small growth towns in the Greater Dublin hinterland area.*

*SS3 To ensure that all settlements, as far as is practicable, develop in a self sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.*

*SS4 To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.”*

With regards to SS1, it is critical that the link between the delivery of much needed housing at appropriate locations which are serviced by existing infrastructure is recognised. It is important the location of zoned residential land has the ability to be serviced quickly using existing infrastructure. The benefit of this is to maximise the return made by the taxpayer on the services servicing areas. We would highlight that there is sufficient physical and social infrastructure in the area including schools, retail, commercial as well as community

facilities and the crèche on the lands owned by our client. As such the use of the lands for residential purposes is considered to be in accordance with Policy SS3.

### 2.2.1.3 Housing

Chapter 4 of the CDP acknowledges that one of the principal functions of a development plan 'is to put in place a framework for the delivery of new housing'. The aim of the framework is to ensure *inter alia* that:

- *"new housing development is encouraged and facilitated, in the correct locations*
- *adequate zoned and serviced land is available in these locations to achieve the growth required."*

Our client's lands located to the south of the existing Bray Retail Park are ideally placed to provide the recorded need for residential lands for the north east of County Wicklow.

With regards to the objective of providing sustainable communities, the CDP includes a number of locational criteria. It is submitted the lands located to the south of the existing Bray Retail Park would be able to avail of the existing social infrastructure in the area such as community and commercial facilities.

#### SUMMARY ON LOCAL POLICY

- 42% of the total growth allocated to County Wicklow is to be located to the metropolitan area
- The CDP emphasises that the delivery of new housing should be within the existing settlement boundaries of towns primarily within the north east of the county i.e. Bray
- Our client supports the proposed Variation No.1 of the CDP which seeks to ensure sufficient land to achieve the short to medium targets for development within the Bray Municipal District area
- The CDP indicates that the strategy for the future LAP should direct new population growth to appropriate areas, proximate to sustainable modes of transport, community facilities and services. In the case of Bray, new residential zoned lands which can be developed in the short to medium term, at appropriate locations to fulfil its role and function as an MCT are required
- Our client's zoned lands are located immediately to the south of the existing built footprint of Bray and are located within the environs of Bray and are, therefore, well placed to contribute to the overall housing need for Bray in the short to medium term in a sustainable manner

## 3 CONSIDERATION OF THE DRAFT LOCAL AREA PLAN

From the outset it is noted that the zoning colouring allocated to sites in the Draft BMDLAP does not correlate to particular zoning objectives as set out in the key. In this regard and based on the clarification issued by Wicklow County Council it is assumed that the shading shown on our client's lands relate to the 'E3: Retail Warehousing' zoning objective.



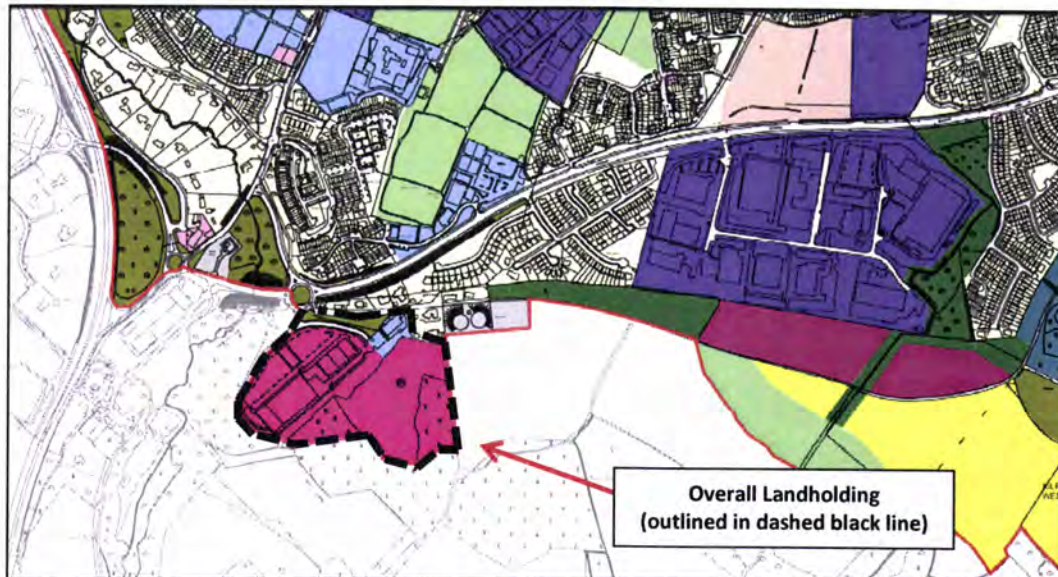
### 3.1 LAP FRAMEWORK

The LAP must play a key role in achieving the objectives contained in higher-level plans and strategies including the NSS, RPG/GDA and the CDP. In order to comply with the requirements of the legislation therefore, the guidelines state that local area plans must be fundamentally guided and shaped by:

- i. any specific aims and objectives for the area of the LAP in the relevant RPG;
- ii. more specific objectives for the area of the LAP identified within the core strategy of the relevant City or County Development Plan, including population targets and quantities of land required for residential or other purposes within such core strategy; and
- iii. the capacity of existing essential social (schools, community facilities) and physical (transport, water services, communications) infrastructure, including the realistic prospects for addressing capacity constraints.

It is important to ensure that the future development of Bray is in line with the core strategy of the CDP and that the new LAP will provide for the appropriate zoning of lands for residential, employment, retail, amenity, community and educational uses in order to deliver a sustainable town through a plan-led approach. One of the overarching principles of the RPG/GDA and the CDP is to ensure that sustainable development is achieved through the development of lands within settlement boundaries. Our client's land is outlined in **Figure 3.1** in the context of the Draft BMDLAP zoning map.

**Figure 3.1** Subject lands proposed land use context



Source: Bray Municipal District Draft Local Area Plan 2017 - 2023

## 3.2 OBSERVATIONS

We have examined the full details and particulars of the Draft BMDLAP as published by Wicklow County Council and wish to highlight the following items:

- the anomaly in the zoning map with regard to the key and assigned shadings;
- no reference to Retail Warehouse Use anywhere in the Draft BMDLAP, apart from proposed change to the zoning table as confirmed by Wicklow County Council in the clarification note issued following publication of the draft plan;
- narrow range of uses proposed within the 'E3: Retail Warehouse' zoning objective.
- concerns as to whether the proposed quantum of lands zoned for residential development can achieve the target population set out in the core strategy of the CDP; and
- particular concerns regarding the period of time that will be required to deliver the housing targets set out for the Fassaroe site within the lifetime of the future LAP.

## 3.3 PROPOSED AMENDMENTS

In light of the above, we propose the following alterations to the zoning of our client's lands as detailed below and illustrated on **Figure 3.2**:

### 3.3.1 Proposed amendment A

For the undeveloped zoned lands located to the south east of Bray Retail Park (A) our client seeks:

***A change from 'E3: Retail Warehousing' to 'R20: New Residential' - 'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities'.***

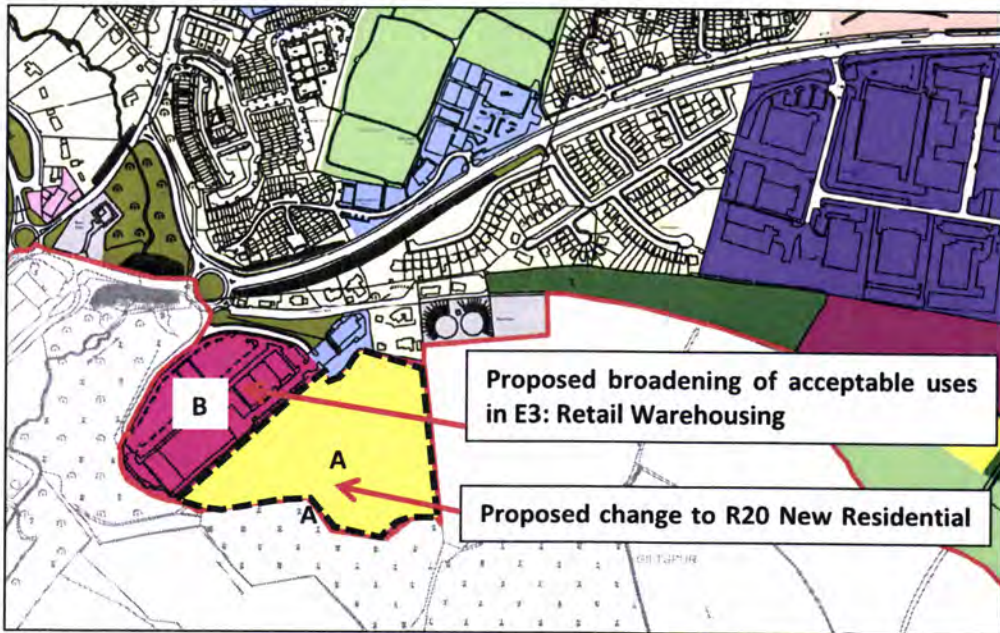
### 3.3.2 Proposed amendment B

For the existing Bray Retail Park lands (B) our client welcomes the proposed 'E3: Retail Warehousing' zoning and seeks:

**The range of uses acceptable under the proposed 'E3: Retail Warehousing' zoning be broadened to include office and other employment generating uses.**



Figure 3.2 Proposed land use zoning changes



### 3.4 JUSTIFICATION FOR AMENDMENT A

On behalf of our client we present below the justification for the proposed amendment A. We respectfully request that the Council review these amendments in light of our submission. Our case is put forward under the following headings:

- Demand for housing
- Location of subject lands and most appropriate land use zoning
- Deliverability of proposed residential zoned lands
- Precedent – Kilruddery.

#### 3.4.1 Demand for housing

Since the adoption of the CDP in November 2016, the results of the 2016 Census have begun to be published by the Central Statistics Office (CSO). While the CDP was prepared using the 2011 data it is important to ensure that an up to date Bray area representation is used in the development of the Draft BMDLAP. From the results of the 2016 Census the population of the State grew by 3.8% from 4,588,252 to 4,761,865 between 2011 and 2016. As outlined in Table 2.3 using the data from 2016 Summary 1 Results, the number of persons in the town of Bray (as defined by the CSO and which includes areas within Dun Laoghaire-Rathdown) grew from 31,872 in 2011 to 32,600 in 2016 representing a 2.2% increase in population.

The population of County Wicklow itself has also increased from 136,640 in 2011 to 142,332 in 2016. This represents an increase of 4.2% which is higher than the overall national average of 3.8%. This growing population and the shortage of new homes on the market require a commitment from Wicklow County Council to provide for quality homes coming on-stream in the short to medium term. Through TIO's prior experience in developing

superior quality homes, in Wicklow and throughout Ireland, the Council can be confident in our client's ability to help them achieve this goal.

**Table 3.1 Population at State and local level 2006, 2011 & 2016**

Area	2006	2011	2016	% Change 2006-2011	% Change 2011-2016
State	4,239,848	4,588,252	4,761,865	8.10%	3.8%
County Wicklow	126,194	136,640	142,332	8.3%	4.2%
Bray (CSO town)	31,901	31,872	32,600	-0.1%	2.2%

Source: Census of Population, 2006, 2011 & 2016. Note Bray CSO town includes areas within administrative area of Dun Laoghaire Rathdown.

The Draft BMDLAP sets out the housing stock growth required by 2025 based on the current population targets for the same. The population of Bray is expected to grow by 8,780 people between 2011 and 2025, from 29,339 to 38,119. As a result of this expected population increase, it is envisaged that a housing stock of +6,133 dwellings is required by 2025. It should be noted that these targets were set based on the results of the 2011 Census rather than the most recent 2016 Census. This growth in population will result in an increased demand for housing.

To address the specific development of Bray Municipal District, the future LAP will have an initial lifespan of 6 years to 2023. As with proposed Variation No. 1 of the CDP, the Draft BMDLAP has been prepared under the premise that the population targets for the county and Bray Municipal District will be revised in light of the 2016 Census, the NPF and RSES. As a result of this, the future LAP should prioritise the need to meet the short term 6 year target, with 2 years 'headroom' to 2025. The Draft BMDLAP states that this 'headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise'. As the economy continues to improve, it is likely that a higher population, and subsequently a higher housing target, will be required.

We are concerned whether the proposed strategy to deliver the required levels to enable the target population as set out in core strategy of the CDP can be achieved. The Draft BMDLAP suggests that lands zoned for residential development can accommodate 6,130 dwellings. It is respectfully submitted that a buffer should be applied to ensure the necessary quantity of housing can be developed. It is not unusual for zoned lands not to come forward for development as anticipated for various reasons, which includes delays in servicing lands within a short timeframe. In this regard, we suggest that a buffer of c. 2% (being the increase in the population of Bray between 2011 and 2016) be applied. This would equate to land for another c. 123 dwellings to ensure the required housing targets can be met within the plan period. We feel this is particularly important to address the 'headroom' of 2 years allowed to extend the powers of the new LAP once adopted.

We propose that to achieve this buffer of c.123 houses, the c. 4 hectares of our client's undeveloped lands could provide c.80 homes. A rezoning of these undeveloped lands to enable the delivery of residential development is vital to achieve the quantum of housing realistically needed to satisfy the demand for housing in Bray during the life of the LAP.



Our client has undertaken a review and a development appraisal of the undeveloped portion of the landholding. This review of the site's suitability sought to ensure the most appropriate use of the land. In this regard, it was deemed that due to strong demand for dwellings in the north east area of Wicklow – particularly sustainable locations in Bray, residential development would be most appropriate. To support the proposals discussed in this submission, an indicative scheme has been prepared for the proposed residential zoned lands to the rear of the existing Bray Retail Park. As our client is in a position to develop the site themselves, we can confirm that an extremely high quality layout and design can be achieved. An indicative residential density of 20 units per hectare is proposed. This scheme is prepared in Appendix A.

### 3.4.2 Location of subject lands and appropriate land use zoning

The Draft BMDLAP sets out that:

*'The town has the potential to be the most sustainable town in the County – a town which can most easily achieve the vision of 'walkable' communities whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance. In addition, all residents in the town have access to a good quality public transport system with local buses and DART services, thereby reducing the dependence of residents on private car use.'* (p5)

We contend that our client's lands at the Bray Retail Park can help to achieve a sustainable community as described above in the short to medium term. The subject site is located in a prime position for future residents in terms of access to local services and community facilities. The local pedestrian infrastructure is very good and high frequency bus routes located just a short walk from the site.

Our client notes that the Draft BMDLAP recognises that there are few undeveloped sites for housing development available in the town. Furthermore, the Draft BMDLAP outlines that future development in Bray is heavily constrained by physical barriers to north, south, east and west. We consider that these constraints allow for the opportunity to develop a more compact urban form for the town as preferred under national and local policy objectives.

Whilst additional residentially zoned lands are required in the LAP, it is our view that the most appropriate approach is a targeted review of rezoning existing zoned employment lands. It is considered that the existing community and open space areas provide a valuable social infrastructure resource for the town and should be protected as much as possible so as to ensure that the existing and future residentially zoned lands have the necessary social infrastructure located and distributed throughout the town.

Our client's undeveloped lands have been identified as being appropriate for development by previous development plans and the Draft BMDLAP. The planning application which was previously permitted on the site (planning reg. ref. 08/811) confirms the site's ability to absorb development at this location. It is also highlighted that a residential use here would be able to avail of the existing facilities and infrastructure (transport and sewerage) in the local area. Moreover this proposal is supported by Draft Objective R4 which encourages the use of under-utilised and vacant sites for residential development. The location of new

development adjacent to the footprint of existing settlements in a sequential manner to existing services and infrastructure from a town centre outwards is preferable and in accordance with best planning practice.

The CDP outlines a number of principles for the zoning/designation of greenfield land for new housing. Our client's lands located adjacent the existing Bray Retail Park adhere to these principles. We outline how in Table 3.1 below.

**Table 3.2 Principles for new housing zoning/designations**

<b>Principle</b>	<b>Compliance of Subject Lands</b>
<i>Application of the 'sequential approach' whereby zoning extends outwards from centres, contiguous to the existing built up part of the settlement</i>	<ul style="list-style-type: none"> <li>▪ The subject lands form part of Bray's development area.</li> <li>▪ The lands adjoining the subject lands are developed and include: <ul style="list-style-type: none"> <li>– the Bray Retail Park (which includes a crèche); and</li> <li>– existing residential development located on Giltspur, at Deepdales (to the east) and Ballywaltrim Grove (on the northern side of Bray Southern Cross Road) .</li> </ul> </li> </ul>
<i>Promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized</i>	<ul style="list-style-type: none"> <li>▪ The lands are located in proximity to existing social infrastructure, public open spaces and within easy range of public transport.</li> <li>▪ The Draft BMDLAP identifies a NC 'Neighbourhood Centre' c.1km to the east of the site on the Southern Cross Road. Once developed it will provide an excellent location for the development of a retail hub serving the southern environs of Bray.</li> <li>▪ We would also highlight that there are a number of existing neighbourhood centres located along the Boghall Road to the north which include Aldi and Tesco.</li> </ul>
<i>Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritized</i>	<ul style="list-style-type: none"> <li>▪ The lands are located in close proximity (i.e. 200m to the north) to the 84X Dublin bus route which provides an express route providing connections to Dublin City Centre.</li> <li>▪ The 145 Dublin Bus route (located c. 400m to the north) providing links to Bray Main St, Shankill, Cornelscourt, Stillorgan, Donnybrook, Leeson Street, before terminating at Heuston Station.</li> <li>▪ Bus Éireann Route no. 133 is located further to the north on Killarney Road.</li> </ul>
<i>Lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized</i>	<ul style="list-style-type: none"> <li>▪ The previously permitted development on the subject site (Reg. Ref. 08/811) proposed to connect to the existing the Bray Retail Park. It is therefore considered that there is sufficient capacity for a residential development on the subject site.</li> </ul>
<i>Cognisance will be taken of the need to provide utmost protection to the environment and heritage, particularly of designated sites, features and buildings</i>	<ul style="list-style-type: none"> <li>▪ A residential development would be more akin to the character and setting of this site rather than the previous industrial use permission (Reg. Ref. 08/811) resulting in the reduced massing and scale of the structures.</li> <li>▪ It is submitted that a residential development would sit comfortably into the context of the landholding.</li> </ul>
<i>The need to maintain the rural greenbelt between towns</i>	<ul style="list-style-type: none"> <li>▪ The proposed inclusion of the undeveloped portion of the lands as residential lands respects the rural greenbelt and will not result in an encroachment of development between towns.</li> <li>▪ It is considered that the use of these lands for residential development is appropriate (and preferable to lands further south at Kilruddery).</li> </ul>

**Table 3.2 Principles for new housing zoning/designations (continued)**

<b>Principle</b>	<b>Compliance of Subject Lands</b>
<b><i>Promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones.</i></b>	<ul style="list-style-type: none"> <li>▪ The subject lands are located to existing community and social infrastructure such as St. Killians Community school as well as Bray Sports and Leisure Centre.</li> <li>▪ In addition, there is an existing crèche (Park Academy) located within the overall landholding.</li> </ul>

### 3.4.3 Deliverability of residential zoned lands

A number of Settlement Strategy Objectives for Bray Municipal District are set out in the Draft BMDLAP. To achieve these objectives and the key parameters for development (i.e. environmental protection, sustainability, minimising car journeys and maximising the use of public transport) a strategy to provide future housing as follows:

- providing 35% of all new housing at suitable sites within the town core, including 1,000 units on the former Bray golf club;
- the development of a major new centre at Fassaroe with the potential to meet up to 60% of the new housing need of the settlement (c. 4,000 dwellings); and
- the designation of a small area of Kilruddery Demesne for additional mix use development including residential.

Draft Objective R5 of the Draft BMDLAP seeks to ensure that the designated residential lands at Fassaroe are to be developed in a comprehensive fashion, rather than piecemeal developments. Almost 4,000 dwellings are proposed on the Fassaroe lands, which equates to almost two third of the overall housing growth of the plan period. Due to the strategic importance of the Fassaroe site, we agree with this strategy for development, however, we are unsure if the totality of the targets allocated to Fassaroe can be completed within the lifetime of the LAP. We submit that lands which are serviced and have the ability to be delivered quickly to the requisite standard should be appropriately zoned to facilitate their development.

### 3.4.4 Precedent – Kilruddery

The LAP Issues Booklet had sought views on the potential for expanding the town on lands to the south of Bray to accommodate new/additional housing in areas such as Kilruddery/Giltspur/Hollybrook. As noted above, an area of land at Kilruddery Demesne has now been proposed for residential development in the Draft BMDLAP.

The Draft BMDLAP states that due to *'the extreme shortfall of suitable housing land in Bray and the high demand for housing in the area'* it considers that there is additional land at Kilruddery that may be suitable for residential development.

It is a concern that environmental sensitivities of Kilruddery Demesne may delay developments being built out. The Draft BMDLAP states *'Growth on the southern / southern western side must consider the historical Kilruddery Demesne'*. Our client's lands have previously been approved for development and are located in a less sensitive location close

to existing services. In response to the *'extreme shortfall'* of housing, it is proposed that the delivery of residential development at our client's undeveloped lands is readily achievable.

### 3.5 JUSTIFICATION FOR AMENDMENT B

On behalf of our client we present below the justification for the proposed amendment B. The north western portion of our client's landholding comprises the Bray Retail Park and also includes a crèche (Park Academy) located to the north. The retail park is anchored by Woodies DIY and includes other retail warehouse operators such as DID Electrical, Flanagan Kerins, Harry Corry, House of Tiles and Maxi Zoo. Overall the employment within the retail park is estimated at c. 100-110 persons.

Our client welcomes the inclusion of the 'E3: Retail Warehouse' zoning objective in the Draft BMDLAP. This zoning objective supports of the retail warehouse function of the existing Bray Retail Park by Wicklow County Council, thereby ensuring that local trade and employment opportunities are not lost and will also prevent the creation of unsustainable travel patterns to retail parks further afield. In this regard we also request that policies supporting the role of the retail warehousing use in Bray be considered for inclusion in the new LAP.

While the proposed '*R3: Retail Warehousing*' zoning objective is welcomed by our client, we are of the view that the proposed list of acceptable uses is narrow and request that list of uses be broadened to include office and other employment uses.

#### SUMMARY OF OBSERVATIONS ON DRAFT BMDLAP & PROPOSED AMENDMENTS

##### ***Residential***

- The results of the 2016 Census show that the population of Bray and Wicklow is growing, this growth will lead to an increase in demand for housing, therefore concerned as to whether the proposed quantum of lands zoned for residential development can achieve the target population set out in the core strategy of the CDP
- Concerned regarding the period of time that will be required to deliver the housing targets set out for the Fassaroe and Kilruddery site within the lifetime of the future LAP.
- Submit that given the character of the subject site (Site A) adjacent to the Bray Retail Park, the proximity to existing services and the servicing infrastructure currently in place, it is reasonable that they be considered to accommodate residential uses.
- Planning permission on Site A (planning reg. ref. 08/811) confirms the site's ability to absorb development at this location. The character and setting of Site A is more akin to a residential development rather than industrial and can provide readily available serviced land in a sustainable location proximate to existing services and infrastructure and which can be delivered immediately by a reputable developer subject to it being designated the appropriate zoning objective.

##### ***Retail Warehousing***

- The land use zoning map needs to be revised to include the zoning objectives as they relate to our client's land holding.



- Welcome the proposed '*E3: Retail Warehousing*' land use zoning objective and request that the proposed list of acceptable uses be broadened to include office and other employment uses.

#### PROPOSED AMENDMENTS

##### Proposed amendment A:

- For the undeveloped zoned lands located to the south east of Bray Retail Park (Site A) our client is seeking: A change from the '*E3: Retail Warehouse*' zoning to '*R20: New Residential*' - *'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities'*.

##### Proposed amendment B:

- For the existing Bray Retail Park lands (B) our client welcomes the proposed '*E3: Retail Warehousing*' zoning and requests that the range of uses acceptable under the proposed '*E3: Retail Warehousing*' zoning objective be broadened to include office and other employment generating uses.

## 4 CONCLUSIONS

TIO, our client is the owner of c.9.8 hectares of lands which were zoned in the Rathdown District Plan no. 2 to accommodate '*E1*' – employment land uses where large scale retail warehousing is identified as a '*normally permitted*' use and office is identified as a '*open for consideration*' use. Bray Retail Park is contained on c.5.8 hectares of this land holding. The balance of the zoned land (c.4 hectares) remains undeveloped.

Following a detailed review of the Draft BMDLAP, it is noted that there is no reference to Retail Warehouse Uses however since the draft was placed on public display Wicklow County Council has issued a clarification confirming that '*E3: Retail Warehousing*' use was been omitted in error from the zoning table as published. The clarification states that this matter will be formally dealt with at the proposed amendments stage of the plan making process. Proposed Map No.2 Land Use Zoning indicates purple shading on our client's lands however the key does not indicate to what use this shading relates. For the purposes of this submission it is assumed that this shading is the '*E3: Retail Warehousing*' land use zoning objective. Our client welcomes the zoning objective proposed reflecting existing retail warehousing uses on the site (Bray Retail Park) however submits that the range of uses which are acceptable on the zoning are too narrow. In this regard, our client is seeking that land uses listed as being acceptable within this objective is broadened to include office and other employment generating uses.

With respect to the balance of the zoned land which remains undeveloped, a review has been undertaken by our client to determine the potential uses appropriate to the subject lands location and context. It is clear that this appropriately located site located to the south of the Southern Cross Road (R768), at Bray (a MCT under the RPG/GDA) will play an important role in securing the objectives as set out in the core strategy of the CDP with regard to accommodating the target population. This site has been identified as being

appropriate for development by previous development plans and the Draft BMDLAP. This land benefited from a previous planning consent (planning reg. ref. 08/811) and therefore is confirmed as being suitable for development. The location of new development adjacent to the footprint of existing settlements in a sequential manner to existing services and infrastructure from a town centre outwards is preferable and in accordance with best planning practice. The character and setting of the site is in our view more akin to a residential development and can provide readily available serviced land in a sustainable location proximate to existing and proposed services and infrastructure and which can be delivered immediately by reputable developer subject to it being designated the appropriate zoning objective.

Our client is seeking the following amendments to the Draft BMDLAP:

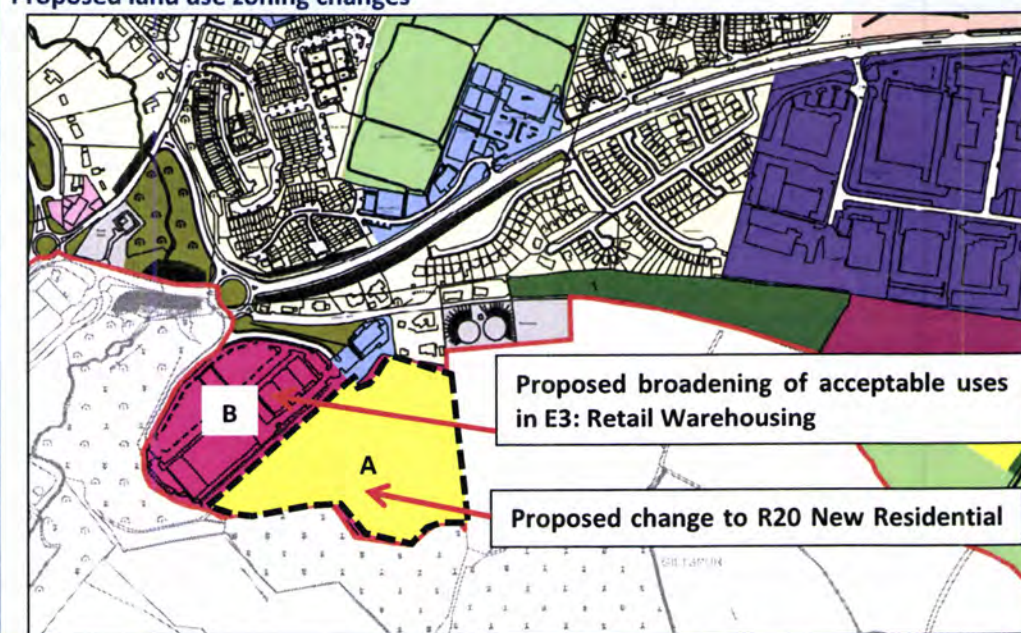
For the undeveloped zoned lands located to the south east of Bray Retail Park (A) our client seeks:

**A change from 'E3: Retail Warehousing' to 'R20 New Residential' - 'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities'.**

For the existing Bray Retail Park lands (B) our client welcomes the proposed 'E3: Retail Warehousing' zoning objective and seeks:

**The range of uses acceptable under the proposed 'E3: Retail Warehousing' zoning objective be broadened to include office and other employment generating uses.**

#### Proposed land use zoning changes



TIO respectfully requests that the proposed amendments sought and justified herein are considered and taken into account by Wicklow County Council in the finalisation of the Bray Municipal District Local Area Plan 2017-2023. It is further highlighted to Wicklow County Council that Bridgedale, a reputable residential development company, with TIO's support, is in the process of being acquired by Glenveagh Properties as a result of the forthcoming €450m Irish housebuilding IPO launch. This gives further credibility to the skills and resources available to deliver the proposed residential development in Bray which will be facilitated by the amendments requested in this submission.

We would also like to confirm that our client would welcome the opportunity to give any further information, access to the site or detail to Wicklow County Council in respect of this submission.

## **APPENDIX A**

### **Indicative Development Strategy for the Subject Lands**



## TIO PROPOSAL

### INDICATIVE FRAMEWORK

To support the proposals discussed in this submission, an indicative scheme (Figure 1) has been prepared for the proposed residential zoned lands to the rear of the existing Bray Retail Park. It is proposed that the site can accommodate a distinctive residential development, which achieves a personal identity while integrating with and contributing to the local services and facilities. The indicative design illustrates that an appropriate level of dwellings can be achieved whilst ensuring adequate public and private amenity spaces are provided.

As our client is in a position to develop the site themselves, we can confirm that an extremely high quality layout and design can be achieved. An indicative residential density of 20 units per hectare is proposed. It is submitted that the emerging potential proposals for the subject lands will provide a high quality residential development in an excellent location.

**Figure 1 Draft Indicative Layout**



Source: McLoughlin Architecture

**Figure 2 Draft Layout – House Typology**



Source: McLoughlin Architecture

**Figure 3 Draft Layout – House Typology**



Source: McLoughlin Architecture



## ACCESS RECONFIGURATION

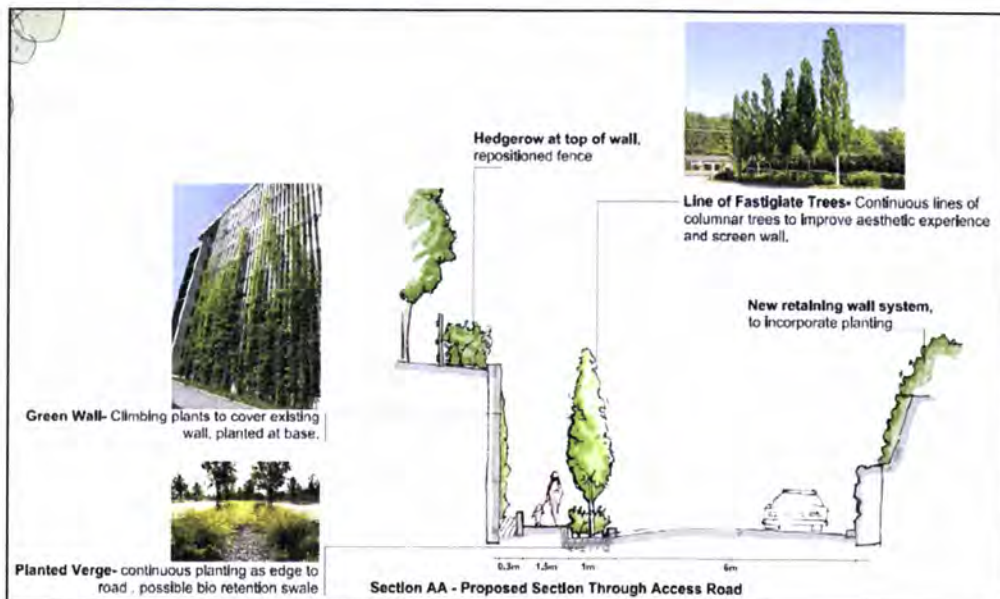
An indicative access arrangement is proposed by our client. The emerging potential design solution for the subject lands includes a review of the treatment of the access to create a shared, yet a very much residential roadway typology to serve the lands to the rear. The intention to split the residents' access to the left and the retail park customers to the right at the entrance.

The roadway will be shared with the existing childcare facility that will in turn serve the housing development and will also continue to support normal deliveries to the existing retail park. The opportunity exists to provide an entranceway with a residential appearance (see Figure 5). So as to manage traffic an amended road configuration will result in a more residential friendly environment for future residents. The reconfiguration will allow the introduction of a landscaped streetscape through a planted verge with column type fastigiated type trees, green climbing walls on both sides and topiary type hedging to both (see Figure 4). At the same time the overall road width will still be capable of accommodating service vehicles for the retail park and refuse trucks for the residential area.

This treatment will continue up to through the existing site to the proposed residential area. The servicing area for Bray Retail Park will be screened with appropriate landscaping to give the proposed residential development hierarchy in the journey from the public road to the proposed residential site to the rear (see Figure 6). The development site will be designed to take full advantage of the topography of the site as well as the expansive views that it offers while seeking to merge with the surrounding landscape and area.

It is highlighted that the permitted access was deemed appropriate for the 2008 commercial/office development located on the lands to the rear of the Bray Retail Park (Reg. Ref. 08/811). It is likely that a residential development, if permitted, would result in traffic levels less than the previously permitted quantum of development here.

Figure 4 Cross Section of Access Proposals



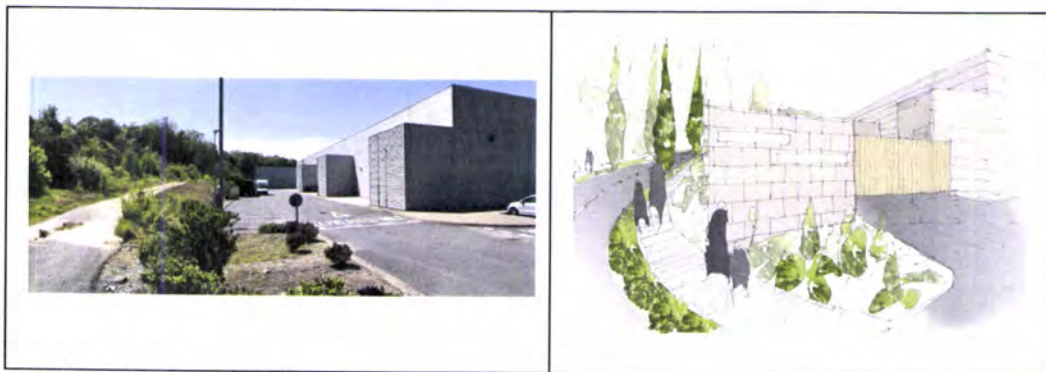
Source: McLoughlin Architecture

**Figure 5 Existing and Sketch Access Proposals**



Source: McLoughlin Architecture

**Figure 6 Existing and Draft Sketch Access Proposals**



Source: McLoughlin Architecture



C298

Bray 11/09/2017

Wicklow County Council  
12 SEP 2017  
PLANNING DEPT.

WICKLOW COUNTY COUNCIL  
12 SEP 2017

**BRAY MD LAP**

**To: Administrative Officer**

**Planning Section**

**Wicklow County Council**

**Station**

**Wicklow Town**

Hi All,

Please consider that with this letter we are opposing the rezoning of Giltspur Wood estate, Bray.

The following reasons in our opinion are enough to oppose the proposed development:

- Traffic health and safety
  - I. There would be construction traffic going through the existing estate for approx. one year which would be a major concern for the children playing in the estate and on the large green area. There was a prior building in another cul de sac in our estate in 2001/2002 and there was a no. of injuries (broken arm, head injury) sustained to children who entered the building site during the construction phase. We do not want a repetition of this.
  - II. The area under construction would be a playground for the small children
  - III. It would be breaking through an existing cul de sac
  - IV. The traffic entering and exiting the estate of Soldier road is already chocked up and this would only add to the problem
- Loss of green space if the land is rezoned, this green space is used also from people, especially children, not leaving in the housing estate
- The additional loss of green space in our existing estate to facilitate traffic to the new houses
- There is a 600-year-old protected structure on the land
- There is a tree preservation order on the threes on the land

Best Regards

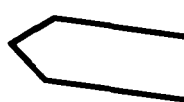
Matteo Tolomio and Teresa Velasco

*Matteo Tolomio* *Teresa Velasco*

Matteo Tolomio and Teresa Velasco

37 Giltspur Wood

Bray Co. Wicklow



Matteo Tolomio and Teresa Velasco

37 Giltspur Wood

Bray Co. Wicklow

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C279

Wicklow County Council  
15 SEP 2017  
PLANNING DEPT.

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

**Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

**1. Natural Amenity:**

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

**2. The Character of Kilruddery Demesne:**

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

**3. Flooding:**

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it 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'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed

*Isaac J.*

Address

*116 HOLLYBROOK PARK*



**Leonora Earls**

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**From:** sar  
**Sent:** 14 September 2017 14:54  
**To:** Planning - Plan Review  
**Subject:** Re: object to planning permission to houses in Kilruddery

Sent from Yahoo Mail on Android

On Thu, Sep 14, 2017 at 2:50 p.m., <  
> wrote:

54 Swanbrook Southern Cross Rd. Bray. Co Wicklow

Sent from Yahoo Mail on Android

**Leonora Earls**

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**From:**  
**Sent:** 14 September 2017 14:50  
**To:** Planning - Plan Review  
**Subject:** object to planning permission to houses in Kilruddery

54 Swanbrook Southern Cross Rd. Bray. Co Wicklow

Sent from Yahoo Mail on Android

**Leonora Earls**

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**From:** Deirdre Walsh  
**Sent:** 10 September 2017 16:04  
**To:** Planning - Plan Review  
**Subject:** Bray draft local area plan

To whom it may concern,

I wish to voice my concerns over the draft local area plan for Bray. I have grave concerns about the following:-

Building on a green belt which is important to Bray residents.

No infrastructure currently exists for Southern Cross residents despite all previous promises.

No decent public transport services.

Traffic is extremely heavy already on the Southern Cross without adding to the congestion.

Potential for flooding.

Access for traffic and pedestrians to new houses. This can be changed at any time without consultation with existing Southern Cross residents.

I wish to lodge my objection to these plans because of the above issues.

Yours sincerely,

Deirdre Walsh

92 Swanbrook



**Leonora Earls**

---

**From:** Tara Walsh [mailto:twalsh@bray.lap.wicklow.gov.ie]  
**Sent:** 06 September 2017 22:14  
**To:** Planning - Plan Review  
**Subject:** Bray LAP

Walsh Family,  
106 Deepdales,  
Bray,  
Co. Wicklow.

FAO: The Administrative Officer, Planning Section.

I would like to submit my objection to the proposed development in Killruddery Lands and the Little Sugarloaf area of Bray.

Myself and my family are residents of Deepdales and we have in the past been regularly affected by flooding and it is my fear that if more works or further development were done in the area proposed, we would once again have a water-logged back garden or worse.

Further concerns we have are in regard to traffic congestion on the Southern Cross Road. At times, we cannot get out of our estate in the mornings. How much more traffic can the Southern Cross Road take at rush hour and how will this development cater for public services such as public transport, lighting, waste & water?

We 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.

We strongly object to this proposed development.

Tara Walsh.



**Leonora Earls**

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**From:** Colin Weafer [mailto:colin@weafer.com]  
**Sent:** 10 September 2017 14:54  
**To:** Planning - Plan Review  
**Cc:** 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; Cllr. Irene Winters MCC; clare moloney  
**Subject:** Southern cross housing development . Colin and clare weafer 21 Swanbrook bray.

I would like to object the rezoning of the lands around killruddery/ little sugar loaf area due to flood concerns / lack of amenities. Also building acces trough Swanbrook/ too many kids playing to have plant machines gaining access/ if they must let it go trough killruddery houses main entrance? Some how I think not. The southern cross road is at maximum capacity at this stage and can be a nightmare to just to leave your own estate as it is. Thank you.

Sent from my iPhone

Sent from my iPhone

**Leonora Earls**

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**From:** Merriall Wearen Kidd [mailto:merriall@kidd.ie]  
**Sent:** 13 September 2017 16:39  
**To:** Planning - Plan Review  
**Subject:** Proposed new road at Kilmacanogue

I wish to make a submission with regard to this proposal:

While acknowledging the necessity to improve traffic flow at peak times in the area I do not believe that this is the solution:

- 1) It will simply shift the present congestion rather than dealing with it.
- 2) Opening the lower slopes of the Little Sugarloaf to housing development contravenes the development plan with regard to " the need to ensure that the planning system guides residential and other development to the right locations in rural areas in the interest of protecting natural and man-made assets in those areas". It is envisaged that this roadway would be paid for by doing this. This is a protected vista and this would be seriously impacted by this proposed development.
- 3) Accordingly this goes against the tourism policy as outlined in the development plan: this area is much used by locals and visitors for recreation. Contemporary research is showing the importance of natural facilities being available in an increasingly urban country.
- 4) Further building will add to the traffic in the area. While the Bray area is earmarked for population expansion in the near future this should not encroach on the green belt between Bray, Enniskerry and Kilmacanogue. There are sites within the Bray area, some of them brown field that should be developed before any further encroachment into the hinterland is contemplated. These are better served by public transport and other facilities.
- 5) the effect of this road, as it was originally proposed, extending to Woodies Roundabout would have a catastrophic effect on a thriving local business, Brennanstown Riding School since it would cut it off from its lands. Even the present proposal would have a deleterious impact on its ability to provide a service to its clients, locals and visitors alike.

Merriall Wearen  
2 Hollybrook House  
Kilmacanogue  
Bray.

**Leonora Earls**

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**From:** Barry Whelan  
**Sent:** 04 September 2017 21:54  
**To:** Planning - Plan Review  
**Subject:** Rejection of Kilruddery Estate Rezoning

Dear Sir,

I reject this proposed rezoning of lands on the Kilruddery Estate and I will expect my local councillors (which I voted for) to uphold this objection.

B OFaolain  
Deepdales

Sent from my iPhone

Sent from my iPhone

**Leonora Earls**

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**From:** Linda Whelan  
**Sent:** 04 September 2017 21:50  
**To:** Planning - Plan Review  
**Subject:** Rezoning of Kilruddery Estate Lands

Dear Sir,

I reject this proposed rezoning and will expect my local councillors (which I voted for) to uphold this objection.

Linda Whelan  
Deepdales

Sent from my iPhone



**Leonora Earls**

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**From:** Saoirse Whelan  
**Sent:** 04 September 2017 21:52  
**To:** Planning - Plan Review  
**Subject:** Rejection of Kilruddery Estate Rezoning

I reject this proposed rezoning and will expect my local councillors (which I voted for) to uphold this objection.

S. Whelan  
Deepdales

Sent from my iPhone

Sent from my iPhone

**Leonora Earls**

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**From:** Tiarnan Whelan [mailto:tiarnan@gnan.com]  
**Sent:** 04 September 2017 21:51  
**To:** Planning - Plan Review  
**Subject:** Rejection of Proposed Rezoning

Sir,

I reject this proposed rezoning and will expect my local councillors (which I voted for) to uphold this objection.

T. Whelan  
Deepdales

Sent from my iPhone

Sent from my iPhone

C290

56 Giltspur Wood

Bray

Co. Wicklow

10<sup>th</sup> September 2017

Planning Section

Wicklow County Council

Wicklow

Wicklow County Council  
14 SEP 2017  
PLANNING DEPT.

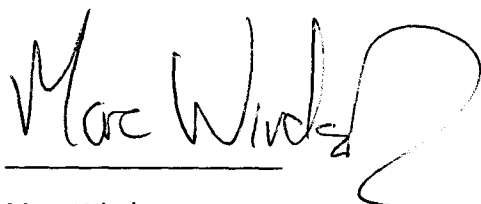
RE: BRAY MD LAP

Dear Sirs

We wish to make an objection to the proposal to rezone existing green/open space lands adjacent to Giltspur Wood to one of residential zoning for the following reasons.

- The loss of green space with in the town of Bray, which is lacking of same at present.
- The requirement to reduce the existing open space with in Giltspur Wood to allow a safe access to these lands.
- Increased traffic volumes onto Oldcourt Park which is already choked at peak times due to the introduction of a one-way system by Bray Town Council (Wicklow County Council)
- Construction traffic through an existing housing estate for a period of appox 18 months during construction of housing if permission was to be granted. Construction traffic would have to pass by existing open space where all the children of Giltspur Wood play.
- Loss of mature trees on these lands that are currently covered by a tree preservation order under the current Bray Town Development Plan.
- Loss of habitat for foxes, bats, wild birds that currently live on these lands.

We hope these points are taken on board when you are making your decision



Marc Windsor



Louise Fortune

WICKLOW COUNTY COUNCIL  
14 SEP 2017  
Corporate Affairs

Marc Windsor & Louise Fortune

56 Giltspur Wood

Bray

Co. Wicklow

A98 H903



**Leonora Earls**

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**From:** Kevin Wolahan [Kevin]  
**Sent:** 15 September 2017 16:17  
**To:** Planning - Admin  
**Subject:** Bray Municipal District Local Area Development Plan  
**Attachments:** Gateway, Transport Hub & Seafront.docx

Please see attached submission regarding the above.

Regards,  
Kevin Wolahan

SLO 5: Gateway & Transport Hub (& Seafont)



Consideration should be given to the fact that the Carlisle Grounds has potential for development whilst maintaining its current status.

Note 1: -There is potential for the development of a multi-storey underground car-park at the northern area of the grounds (this area is currently used as a ground level car-park), which would be of benefit to visitors, Dart, and future Luas users.

Note 2: - Consideration should be given to the backdrop to the north (Carlisle Grounds) portion of this Specific Local Objective (marked in blue, above). This area comprises of crude blockwork wall in various finishes (apart from the Cenotaph, which should remain). If the "linkage" objective is to be realised it is essential that this area should be included in the Plan. This could take the form of sympathetic mixed low-rise retail building(s) or structure(s) complimenting (whilst maintaining) the objective for the Carlisle Grounds.

Note 3: - Consideration should be given to the Seafont area immediately opposite the level crossing, to complement the Gateway & Transport Hub objectives in this area (marked in pink above). This is the most prominent portion of the Seafont visible upon arrival via either the Gateway & Transport Hub, or by car and particular attention should be given to the visual impact of this area. There area would be served with the erection of a sculpture that would be emblematic of Bray. The grassed area has potential for a paved, soft /hard landscaped urban park adjacent to the car-park that could be used by the visitor. Currently, this area has been maintained as a rough grassed field, but would of particular use if it were developed to compliment Seafont uses

END

**Leonora Earls**

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**From:** lesleyann jackson  
**Sent:** 15 September 2017 08:15  
**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; 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; Cllr. Edward Timmins MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Miriam Murphy; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley  
**Subject:** Kilmacanogue, rezoning little sugar loaf

Lesleyann & Eoin Wylie  
 Kilfenora House  
 Barchuilia Commons  
 Kilmacanogue  
 Co. Wicklow

Dear Sirs,

I was very disappointed to learn recently of Wicklow county council's intention to rezone lands on the lower slopes of the little sugar loaf, and I wish to lodge a formal objection in respect of these intentions.

I am sure for the 32 Wicklow councillors, they don't need a map or a drawing to tell them the location of the little sugar loaf, or to explain to them how precious a mountainside this is, since there is hardly a person in Dublin, Wicklow or its surrounds that doesn't know instantly the location and beauty of this little mountainside. The facility to walk the little sugar loaf from Kilmacanogue is well know and well used and the views from the opposite side of the road, whether that be the walk down the hill from school or the view from the big sugar loaf is breathtaking.

The reports against the road has already been commissioned, by our own government, in the form of the TII Transport for Ireland which stated that there is no need for this road and it is 'superfluous' to requirements'.

Furthermore, the damage to the biodiversity in this area is already well noted as it gets a red card for the damage this road will do.

I believe the final intentions of the council is to open the land for development and this we also object to.

I would also like to appeal to the practical. Nobody understands the need for housing and development more than our family. We are very recent additions to Kilmacanogue. It has taken us 4 years to acquire a property that we can afford, that can adequately fulfil our housing need, having four children, that was within commuting distance of Dublin where we work, whilst also staying near family. The current housing crisis where families of our size are really struggling to obtain property is a complex one, wrapped up in a struggling economy, with restrictive bank lending and high house prices. This is not going to be solved by developing the little sugar loaf.

The lower slopes of the little sugar loaf should be viewed as a recreational ground. You don't see plans in Dublin to eat into Marlay park, or Newbridge estate, or Malahide Park, all in areas of dense population with higher housing needs than wicklow.

Therefore, I would appeal to all 32 councillors to think of the long term implications of cutting into this well known landmark and reject the proposals. Protect our views, our wildlife, our recreational ground and find another, more suitable location for housing.

Regards,

Lesleyann & Eoin Wylie

**Leonora Earls**

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**From:** Jesse Zauka [jess  
**Sent:** 05 September 2017 14:29  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017

To Administrative Office,

I am a resident of La Vallee apartments in Bray. Curently cyclists and pedestrians have very limited space there. I mean, there is no pedestrian/cycling bridge to Fassaroo. Also, Dargle Road full of dust and families with kids do not feel safe walking there. I'd like to suggest to make a bridge to Herbert Road or Fassaroo. La Valle/Riversdale residents would be very happy if you consider a pedestrian bridge to "big Bray". Thank you so much for your time and consideration.

Regards,  
Jesse



**Leonora Earls**

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**From:** David Zemský [da  
**Sent:** 10 September 2017 19:55  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP

Dear Sir or Madam

We are contacting you as the owners of 38 Giltspur Brook regarding the re-zoning draft of Bray, specifically the Giltspur Wood / Giltspur Brook area. The new construction site would be adjacent to the back corner of our garden and potentially, to the side of our house.

Our main concern is the access point. If the decision was to access the new site from the Giltspur Brook side, this would mean building a new road next to our house in place of the green area there that is used by parents and children now and also by dog walkers. Accessing the site through our part of Giltspur Brook would seem quite dangerous as the roads are very narrow and there is usually a lot of children playing here. We cannot imagine construction trucks going through here every day for a year or more. Also, this would reduce the parking spaces available at the houses around.

Another great concern is obviously noise from construction; this has been a very quite area so far.

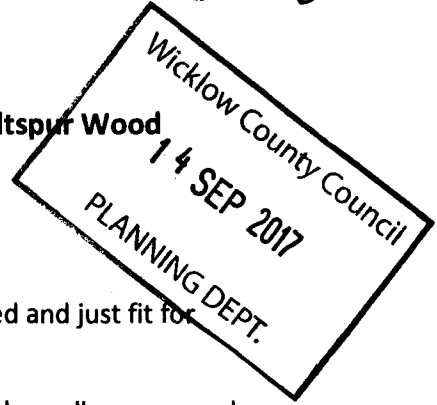
One more issue to mention is security of the neighbourhood. There have been a few cases of burglary in the past few years and enabling access through the existing wall would mean much greater risk / easier access to the back of our houses.

We hope that our strong concerns will be taken on board, when taking the vote.

David and Veronika Zemsky

Address: 38 Giltspur Brook, Bray  
Mobile numbers: 0

C295



RE: Proposed Re-Zoning of 2 Plots of Land at Rear of Charnwood & Giltspur Wood

**Settled estate** – This is a settled estate built around 1970 and is well established and just fit for purpose for the current amount of houses in same.

**Cul de sac** – If re-zoning goes ahead this will give more access to houses either by walkway or road access.

**Traffic /Safety Issues** – More development will in turn mean more traffic within the estate which will make it even more dangerous for people currently living in the estate and will create even more parking issues.

**Traffic issues at the junction** – At the junction of the front of the estate during school times and rush hour it is already difficult enough to get out of the estate – more houses with mean even more problems for the estate and more safety issues.

**Anti-social behaviour** - Easier access for others also means more anti-social behaviour – there are already issues with regard to the back of the estate and youngsters, often not even from the estate, gathering and fires being lit and underage drinking taking place. Also there are already issues with regard to house break-ins, more access will provide more routes for thieves to escape un-noticed.

**Oldcourt Castle which is a historic site** – This will be effected by this re-zoning. These sites should be protected at all costs as once development has taken place it is there is nothing than can be done to rectify this matter.

**Trees** – There are many well established trees located at the back of the estate which form an integral part of the estate and should be protected and not simply chopped down or even if they are left in situ their roots may very well be damaged by any development taking place.

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

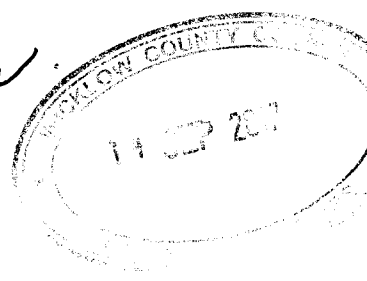
**With all the above matters outline I the undersigned strongly opposing this re-zoning**

Signed (Resident) Luey and Herry

Date 11/09/2017

Residents' Address 139 Charnwood, Bray Co. Wicklow

Address must be included on petition



**ZONING #R20, OLDCOURT ESTATE: Draft Bray Municipal District Local Area Plan. 2017**

Submission from Charnwood residents living in end row of houses adjoining Oldcourt field, east of River Swan.

**TREES**

**Maintenance of existing trees, hedges and embankments between adjoining field and ends of gardens in last row of houses in Charnwood:**

We welcome the recommended greenway along the Swan River in the Oldcourt Estate, linking up to the Dargle River. Similarly we would like to inform the Planning Department that there are trees of historical importance at the bottom of our gardens. We would ask that the trees, hedges and embankment at the end of our gardens would be considered as natural features to be retained under the objective that existing mature trees and hedges should be preserved along with an adequate buffer zone between any development in any planning application. This would ensure that the impact of the new development would be minimized, as well as providing a natural barrier between our estates. (Wicklow Green Infrastructure Development Plan Strategy. NH3, NH14, NH19.)

**Notes on special nature of trees.**

The oak trees on both sides of the field are hundreds of years old, and are part of the original Oldcourt Demesne and which are shown on the old 6" maps, upon which many Tree Protection Orders exist, namely on the trees by the river, on the other side of the field marked for development. Being large and mature trees, they would be expected to support a wide variety of bio-diversity and enhance the overall environment.

**Suggested easement of 15 metres**

We would ask for an easement of minimum 15 metres exclusion zone to the development boundary would be appropriate to protect the trees on both sides of the field, our side and the river side, in order to protect their root base. This would also make a barrier between our estate and the new estate, and ensure new residents don't request the trees are removed due to health and safety.

**EMBANKMENT**

**Suggested retention of existing embankment at end of our gardens: recommended as flood prevention for field earmarked for development**

The existing embankment on which the hedges grow beside the trees is about 4 or 5 feet high, and acts as a natural water barrier between our estate and the field. If it was removed more water would run down our estate into that field. Every year more homes pave their front gardens, and we are already seeing water gathering in front of the embankment and in front of our houses, as run-off grows. In view of predicted increases in heavy rainfall events we suggest these embankments be retained.

Signed..... Lucy ..... Date ..... 11/09/2017 .....  
Address in Charnwood..... 139 ..... (Your address must be included)

**Leonora Earls**

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**From:** Brigid O'Brien [mailto:brigid.o'brien@bray.gov.ie]  
**Sent:** 15 September 2017 12:58  
**To:** Planning - Plan Review  
**Subject:** Local Area Plan Bray 2017.

I have lived in Bray since 1984 and I love it. I am interested in making it a better place for us all to live. The following ideas are what I think would help.

1. Social Housing. We ignore this at our peril. Everyone needs a home. The lack of investing in one of life's basic necessities when we had the money is shameful. So build more. Not the schemes of yesteryear but the integration of housing into communities.
2. The Flood Plain. Please leave it alone. Allow it to become the soakage area for wild life and grasses. It would have a value as a special study area for engineering students. This did happen in Salzburg after their river returned unexpectedly to its original course.
3. A Skate Park. There is a grassed area above Naylor's Cove which could work.
4. Develop the North Beach as a Dog Park for 'off the lead' exercise. It wouldn't require a lot more than a gate on the pier for access and to stop dogs from escaping.
5. More seating. There's plenty on the seafront but a lack of it in the town.
6. Keep The Carlisle Grounds as a recreational and green area. Putting towns under concrete is environmentally unsound and it removes part of the history of the town.
7. Turn Bray into a Blossom Destination. Cities and towns worldwide have become destinations to visit because of their strategic planting of Blossom Trees. Walkers, cyclists, families and all of us can share the beauty of season change in the company of deciduous trees. This would encourage wildlife, clean the air, enhance our town, soak up rainfall, and create a natural feel good factor. Public planting like this would encourage people to plant favourite trees in their own gardens.
8. This town has a strong Arts history and community. Ardmore Studios, Bray Arts, Signal Community Arts Centre, Mermaid Arts Centre, BIFE, Abraxis Writers Group, Little Bray Writers Group, Outpost Studios, several Choirs, The Bray Music School, Ceoltas and more. There is a lot of Arts Activity. There is always somebody making music, sculpture, murals, stories, drawings and more. Many Writers and Artists live in Bray and Wicklow. It is worth considering if we should make more of this by considering ourselves an 'Arts Town'. As an identity badge it is a good fit.

I hope these ideas are helpful.  
Brigid O'Brien.

ent from my iPad