C 41

Leonora Earls

From: Gracie Cafferkey [
Sent: 13 September 2017 09:45
To: Planning - Admin; Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. 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; Philip Egan
Subject: Objection to planning for development, Kilruddery, Southern Cross Road

To whom it may concern,

My name is Gracie Cafferkey. I am a primary school teacher in Blackrock and I have just moved to the Southern Cross Road to 117 Hollybrook Park, with my fianceé, Philip Egan, he works at Today FM in the city centre. Our home is beside Kilruddery and the proposed plans for housing development.

We both have quite a few objections to the plans, and the high number of problems they would cause. The most worrying one being that the land cannot cope from a drainage point of view with any more houses being put in. The last thing we want is for our home and the homes of our neighbours to become flooded. There are many children in the area and any children we have in the future will be greatly affected by this, it would be disastrous and detrimental to the safety we try to provide for families.

I believe the area was promised a range of amenities many years ago, which have not happened. There is no shop to walk to, no play ground for the children. The traffic is terrible and there is not sufficient public transport.

I know the 84x runs during business hours Monday to Friday but at night times and at the weekend there is nothing going up this road. My fiancee gets the 145 home late at night and walks up the Southern Cross Road to Hollybrook, maybe 12 at night. It is simply not safe.

Can the 145 bus service be extended to Greystones or even the Wilton? Can the 84x be rolled out over weekends and at night time? These things would need to happen regardless of more development. They're needed now. I know there is a private bus company, but this is not sufficient and the busses are old a decrepit. An adequate public bus service on this route is seriously required asap.

Given all the ongoing development in Greystones, and the growing pressure on the Southern Cross Road, it would require all infrastructure be improved and built in before putting more houses in this area. Surely it makes sense to prevent all these problems from happening, rather than build the houses and then have a whole host of major issues to fix in the aftermath.

Building on this land, another 240 houses would be ridiculous, and unfair on the existing residents. The flood risk, lack of amenities for families, and all people, the growing pressure on transport and infrastructure, all the damage to the natural environment. I would be terrible.

I implore you to use your power and your influence to put a stop to this development plan. Both my partner and I, and all our neighbours would hate for it to go ahead for fear of all these issues and more.

Please help us to protect our homes and our space.

Sincerely

Gracie Cafferkey

C42

Leonora Earls

From: Gracie Cafferkey
Sent: 13 September 2017 09:50
To: Planning - Planning and Development Secretariat
Subject: Planning Objection to development on Kilruddery

To whom it may concern,

My name is Gracie Cafferkey. I am a primary school teacher in Blackrock and I have just moved to the Southern Cross Road to 117 Hollybrook Park, with my fianceé, Philip Egan, he works at Today FM in the city centre. Our home is beside Kilruddery and the proposed plans for housing development.

We both have quite a few objections to the plans, and the high number of problems they would cause. The most worrying one being that the land cannot cope from a drainage point of view with any more houses being put in. The last thing we want is for our home and the homes of our neighbours to become flooded. There are many children in the area and any children we have in the future will be greatly affected by this, it would be disastrous and detrimental to the safety we try to provide for families.

I believe the area was promised a range of amenities many years ago, which have not happened. There is no shop to walk to, no play ground for the children. The traffic is terrible and there is not sufficient public transport.

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Please help us to protect our homes and our space.

Sincerely

Gracie Cafferkey

C43

Leonora Earls

From:	Cahill, Amanda
Sent:	15 September 2017 15:02
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. 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: Proposal for Kilmacanogue - Objection from Kevin & Mary Cahill Riverside House, Kilmacanogue, Bray, Co. Wicklow
Importance:	High

RE: Proposal for Kilmacanogue - Objection from Kevin & Mary Cahill, Riverside House, Kilmacanogue, Bray, Co. Wicklow.

'lease acknowledge receipt of this submission.

FROM:
Riverside House
Kilmacanogue
Bray
Co. Wicklow
15th September 2017

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

planreview@wicklowcoco.ie

To whom it may concern,

RE: Proposal for Kilmacanogue

We are writing to communicate our frustration and concern on hearing Wicklow County Council's proposal to build a major new roadway on the slopes of the Little Sugarloaf Mountain, and to finance that roadway by re-zoning the unspoiled mountain slopes surrounding it.

In November 2011 we submitted an objection to the proposed linking of the "Woodies" roundabout on the Southern Cross Route in Bray directly to the Eastern roundabout at Kilmacanogue village and almost 6 years later we are voicing our objection once again.

We are very distressed and upset by this proposal for a number of reasons:-

Kilmacanogue Village was practically destroyed by the upgrade to the N11 works. Now Wicklow County Council are proposing the re-zoning of lands and the development of a new roadway and which will desecrate the open areas immediately to the East of the village.

From a personal perspective we were severely impacted by the upgrade to the N11 works carried out 16 years ago through the village. We feel that the road works carried out at the time should have taken into account any future requirements from a planning perspective. We believe that the residents of Kilmacangue shouldn't be subjected to major road works again as a result of insufficient planning on the part of the Wicklow County Council.

- **The proposal will effectively leave us on an "island" surrounded by major roadways**

This proposal will effectively cause the formation of an "island" between all of these major roadways. Personally, we will be further isolated from the rest of the village and we will be destined to suffer increased levels of noise and air pollution for the rest of our lives in Kilmacanogue. This will severely affect our quality of life.

- **A poor history of roadway planning in the Kilmacanogue area**

Wicklow County Council's own planning history in the Kilmacanogue area has not been good and their work on the N11 upgrade project was marked with an insensitivity, which has destroyed the village. The amenities and infrastructure to serve the village have gone from bad to worse as a result also.

The ugly concrete bollards in the central margin of the N11 are a monument to their inability to assimilate sensitivity into the area. Despite objections at the time, Wicklow County Council insisted that an EU directive mandated the use of precast concrete units on the roadway median. Later it turned out that they were using stressed cable systems elsewhere at other locations. Meanwhile we in Kilmacanogue are left with an extraordinarily ugly roadway which will always be impossible to landscape.

Despite all the upheaval, the N11 roadway passing through Kilmacanogue is notoriously unsafe, particularly at the exit from the Topaz Service station and the southbound ramp exit. It seems extraordinary that the engineers collectively could not develop a safe sensible solution to a routine set of problems.

- **Significant increase in volumes of traffic**

We believe that the proposed re-zoning and roadway will significantly increase the volume of traffic to Kilmacanogue village. Very large numbers of cars will route through both of villages' roundabouts making local journeys around our local amenity difficult.

- **Poorly thought-out plan**

The proposed re-zoning and roadway is a poorly thought-out reaction to local traffic issues elsewhere along the N11 roadway and it arises in particular from the problems of the Southern Cross Route where very high levels of traffic movement cause long delays every morning and every evening.

- **Relocating the traffic jam**

The proposed re-zoning and roadway will simply relocate the traffic jam from the Southern Cross Route directly to the Kilmacanogue area. These issues should be dealt with locally at the Hills Garage Roundabout by addressing the outdated interchange which connects the Southern Cross Route to the main N11 roadway. These issues are local to the Southern Cross Route and must not be linked into Kilmacanogue.

The existing local roundabouts on both sides of the Kilmcanogue interchange will be inundated with vans and heavy goods vehicles and the village will simply not be able to cope. Kilmacanogue will effectively become a "rat-run".

- **Deer, pheasant, otter an lizard**

The lower slopes of the east of Kilmacanogue village are a rich and diverse habitat for both flora and fauna and home to successful and stable population of deer, pheasant, otter, pine marten, badger and lizard. The proposed roadway and re-zoning will devastate the natural habitat. The deer will move away from the area, while the otter and the lizard that would be located immediately adjacent to the proposed site area will not survive.

- **Views from Kilmacanogue to the Little Sugarloaf compromised**

The existing views from Kilmacanogue village out over the Little Sugarloaf Mountain will be greatly compromised by the proposed re-zoning and roadway. We have more than our fair share of traffic and roadways in Kilmacanogue and it seems extraordinary that Wicklow County Council would entertain the re-zoning of lands and the construction of additional roadways on these unspoiled uplands.

- **Kilmacanogue is not a suburb of Bray**

Kilmacanogue has an identity in its own right and is not a suburb of Bray. The proposed re-zoning and roadway brings no advantage whatsoever to our village but places a greater burden of disadvantage on all who live here.

- **Development issues on the Little Sugarloaf**

The re-zoning of lands for development will also impact on the current residents of the Little Sugarloaf. As a result of the upgrade works, there has been an increase in flooding along the little Sugarloaf over the past number of years. Every winter, the water and shale pools outside of our home and we are left to sweep this away as there is nowhere for it to go as there is inadequate drainage from the Old Bohilla Lane and the Kilfenora Lane.

In conclusion the proposed re-zoning and roadway is a poorly thought-out reaction to local congestion at the outdated interchange which connects the Southern Cross Route to the main N11 roadway.

We believe that this proposal will eat substantially into the slopes of the Little Sugarloaf Mountain, and that it will impact greatly on the visual and the environmental balance of the entire Kilmacanogue valley. We have a very limited number of mountains in this country and very few which are so close to our capital city. It is vital that we protect the unspoiled nature of these precious resources for the enjoyment of all our citizens, and particularly so, for those generations yet to come.

We believe that it is the duty of our Local Authorities to protect our environment, and particularly so where it is both beautiful and unspoiled. We believe that, in proposing this unnecessary roadway, Wicklow County Council is failing in that duty.
The proposed intrusion onto the slopes of the Little Sugarloaf is of such scale and crudeness, that it will detract greatly from those magnificent vistas which have been enjoyed for hundreds of years by climbers of the Big Sugarloaf Mountain. The vista from the Big Sugarloaf, Eastwards towards the Irish Sea, is one of the great views of our country, and must be protected at all costs!

The lower slopes of the Little Sugarloaf Mountain comprise a rich and diverse habitat, supporting large numbers of common deer, lizard, pine marten, and badger, not to mention pheasant, sparrow hawk, and a wide range of songbirds. Indeed, it is perhaps the nearest unspoiled habitat to Dublin City and, as such, should be treated as a valuable resource.
The views from the upper slopes, and the walkways on Bohilla Commons, are expressly protected under the existing development plan. It seems bizarre that persons living in the area are greatly restricted in extending their homes, while the Council itself can destroy whole sections of the mountainside with scant regard to these same express protections.

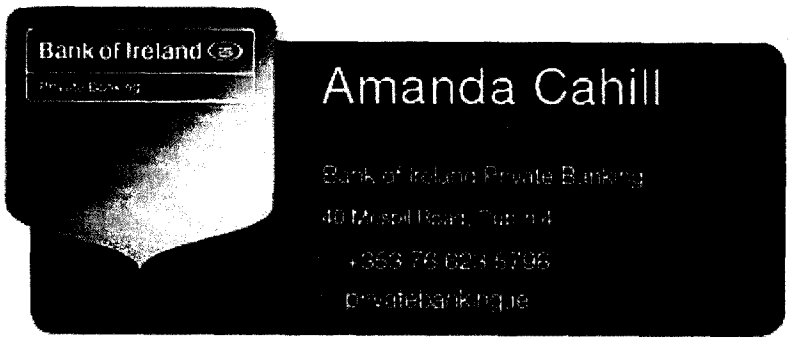
The roadway proposed by the Council is entirely unnecessary. It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible, and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.

We ask that the roadway and funding-related rezonings proposed by Wicklow County Council, be omitted entirely from both the WCC Development Plan 2016-2022, and the Bray and Kilmacanogue Local Area Plan 2017-2023.

Yours sincerely

Kevin & Mary Cahill

Kind Regards,
Amanda



Classification: GREEN AMBER RED PURPLE

SAVE PAPER - Please do not print this e-mail unless absolutely necessary

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C44

Leonora Earls

From: Emma Flanagan [
Sent: 15 September 2017 16:34
To: Planning - Plan Review
Cc: Aidan McLernon; James Donlon
Subject: Draft Bray Municipal District Local Area Plan - Submission by Cairn Homes
Attachments: Draft Bray Municipal District Local Area Plan Submission.pdf

Sir/Madam

Please find attached our submission on the Draft Bray Municipal District Local Area Plan.

I would be grateful if you could confirm receipt at your earliest convenience.

Regards

Emma

'mma Flanagan
Town Planner

CAIRN PLC

CAIRN PLC
7 Grand Canal,
Grand Canal Street Lower, Dublin 2,
T: +353 1 696 4600 **M:** +353 860473773
E: emma.flanagan@cairnhomes.com www.cairnhomes.com

CAIRN PLC

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+353 1 696 4600
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www.cairnhomes.com

planreview@wicklowcoco.ie
Administrative Officer
Planning Department
Wicklow County Council
Whitegates
Wicklow Town

BY EMAIL ONLY
15th September 2017

Dear Sir or Madam,

DRAFT SUBMISSION ON THE BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

Introduction

Cairn PLC welcome the opportunity to make this submission on the Draft Bray Municipal District Local Area Plan (LAP) 2017-2023.

Following our successful IPO in June 2015, Cairn have acquired a core land bank of residential development sites throughout Ireland which includes land in Enniskerry, Co Wicklow. Cairn are currently building on 9 sites in the Greater Dublin Area which have the capacity to deliver 3,250 homes which illustrates our capacity to deliver new homes at a significant scale in response to the current house shortage.

Cairn are committed to working with local authorities in the delivery of houses to address the current housing crisis, whilst ensuring all developments are in accordance with the proper and sustainable development of local areas. Cairn welcome and support the policies and objectives of the Bray Municipal District Local Area Plan 2017-2023 (hereafter referred to as the Draft LAP).

Housing Targets

The Draft LAP state the population target for Enniskerry is 2,401 by 2025, with a resulting requirement for an additional 470 units. It is noted that the population and housing targets for the Draft LAP are still reliant on the 2011 census figures. We would respectfully request, to ensure a robust plan, that the Council update these figures to reflect the latest census information. It is our understanding that the CSO have released a full suite of 2016 census information for population and housing as of July 2017. Based on the CSO's figures the population of Enniskerry has increased by 4.8% between 2011 and 2016, while there has only been a 3.4% growth in housing numbers. This indicates housing numbers in the town are failing to match population growth in Enniskerry.

In relation to the Draft LAP figures it is unclear what geographical area was used in the calculation of the population and housing targets. The census figures do not appear to be based on the Enniskerry

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Electoral Division or the CSO's legal definition of Enniskerry town. It is therefore not possible for the public to comment on the accuracy of any of the figures in the Draft LAP.

Cairn have commissioned independent research to identify areas of potential housing demand. Coupled with the CSO's population projections, census information, and housing vacancy rates we can estimate housing requirements in urban areas across the country. In the case of Enniskerry, we predict there will be a shortfall of housing provision of between 77 units (assuming a low growth scenario in line with the CSO's low growth projections) and 116 units (assuming a high growth scenario in line with the CSO's high growth projections) relative to population growth between 2017 and 2025. The exercise did not take account of "pent-up" demand, which as the Council aware is a significant legacy issue. In our opinion, the shortfall of residential units in Enniskerry is therefore likely to be significantly higher, and the new plan must legislate for this.

It is the responsibility of the Council to provide adequate zoned land in appropriate areas to accommodate residential development. Whilst we acknowledge that the Enniskerry LAP was recently reviewed as part of the CDP review process, this was done without the benefit of up to date CSO figures. In addition, the housing crisis has intensified and the demand for houses increased exponentially. Given Enniskerry's location in the GDA convenient to Dublin City we believe the Council have a responsibility to make more efficient use of serviced zoned land within the development limit of Enniskerry. The making of the new LAP offers an opportunity to review the Core Strategy figures and produce a potentially more reliable plan for Enniskerry up to 2023.

Zoning and Density

Zoning and density are intrinsically linked in the Draft LAP, with different densities permitted on sites depending on the residential zoning. Densities in Enniskerry vary between 10 and 40 units per hectare but the predominant density guide equates to 20 units per hectare. Cairn own lands within Action Area 3 – Cookstown. The extent of these lands is illustrated in Figure 1 below (site outlined in blue). As illustrated in Figure 1, the majority of the lands in Cairn's ownership are designated R20 which permits a density of 20 units per hectare.

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Figure 1: Draft Zoning Map Extract

Cairn feel that the densities promoted in the Draft LAP do not comply with national guidance and do not make efficient use of zoned and serviced land located with the metropolitan area of the Greater Dublin Area. Enniskerry is within the Metropolitan Area of Dublin, as identified in Figure 12 of the Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022.

The *"Sustainable Residential Development in Urban Areas"* Guidelines, May 2009 (hereafter referred to as the Guidelines) provide guidance at a national level on appropriate densities in towns, villages and urban areas. Most residential zoned land in Enniskerry is restricted to low density levels of less than 20 units per hectare. The Guidelines state in Section 6.12, that *"no more than 20% of the total planned housing stock in small towns and villages should be at this lowest density level"*. The quantum of residentially zoned land at very low densities in Enniskerry far exceeds this 20% threshold. The Draft LAP therefore would appear to be in breach of national guidance in relation to the recommended densities for sites in small towns and villages.

In line with the Section 28 National Ministerial Guidelines, densities in the range of 20 – 35 units per hectare are recommended on 'Edge of Centre' residential zoned land in in a small towns or villages, such as Enniskerry. We believe that due to the proximity of the Cairn land to the town centre, approximately a 10 minute walk, a slightly higher density of 20 – 35 units per hectare can be successfully accommodated while respecting the character of the town and area.

The Council are requested to re-consider the densities proposed in the Draft LAP and to apply a more sustainable and flexible density range, in line with the *"Sustainable Residential Development in Urban Areas"* Guidelines. It is possible to achieve more efficient and sustainable densities yet retain a low-

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density character to a development. This can be achieved by quality urban design, the design of public open space and bespoke house designs.

Action Area 3: Cookstown

As stated above, Cairn own lands within Action Area 3. The Draft LAP includes a number of site specific requirements for Action Area 3 as follows:

- *A maximum of 105 housing units may be provided in this action area, with density not exceeding 10/ha on the lands zoned R10, and the remainder may be developed at a higher density but not exceeding 20/ha.*
- *A minimum area of 0.4ha shall be provided for voluntary / sheltered housing, of a type to be agreed with the Local Authority, as part of any Part V obligations under the Wicklow Housing Strategy. Permission will not be considered for private housing until sufficient progress has been made on this element.*
- *Access to the site shall be from local road LP-1020.*
- *A public park of a minimum of 2ha shall be established along the full southern and western boundaries of the action area, which shall comprise an amenity walk area along the existing tree lined field boundaries connecting through the development to regional road R760 (Enniskerry – Kilmacanogue) and to the existing pedestrian route along the Dargle. In light of the provision of such an amenity space, the incidental open space required to be interspersed throughout the residential area may be reduced to 7.5% of the total zoned residential area.*
- *Any development shall be so designed to maintain maximum views of the Sugarloaf from Cookstown Road.*

In general, Cairn support the above objectives and is committed to assisting in their delivery where possible. However, Cairn would have concerns about the cap of 105 units on the site overall as it is considered that more efficient use of this zoned land can be achieved through high quality design and construction.

Cairn do not propose to develop excessive amounts of terrace or duplex units to achieve these higher densities. Instead Cairn believe that higher density parameters will allow them to deliver a broader range of unit types within the site but respect the character of the area. Delivering smaller units where the cap of 105 units is retained will result in a larger number of large homes on large plots which we consider to be an inefficient use of the site. Whilst an element of larger units is desirable by Cairn, we believe that the cap of 105 units should be removed entirely and development controlled by more conventional and well-established development control standards that are successfully applied elsewhere in Wicklow.

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Other Objectives

Although Cairn is generally supportive of the policies and objectives of the Draft LAP which seek to limit and control future development in Enniskerry, they have concerns in relation to policies R6 and R7 which state:

- ***R6:*** *- The maximum size of any single 'housing estate' shall be 60 units and developments that include more than 60 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes.*
- ***R7:*** *- A full range of unit sizes, including smaller 1 and 2-bedroomed units shall be provided in all new housing areas. No more than 50% of the units in any development shall exceed 3 bedrooms or 125sqm in size.*

It is recognised that Wicklow County Council are seeking to ensure a mix of tenures, design, and house type and whilst Cairn support such aims we feel this can be achieved in a less prescriptive way. In our experience, the same result can be achieved through more flexible policies which allow for innovative design and ensure developments reflect local housing need.

Cairn request that R6 and R7 are replaced with more flexible policies and propose the following as potential wordings:

- R6: Ensure that an appropriate mix of housing types and sizes is provided in each residential development over 60 units.
- R7: Ensure that a wide variety of adaptable housing types, sizes and tenures are provided to support a variety of household types.

As stated above restricting 50% of the units to up to 125 sq.m and imposing a cap of 105 units on Action Area 3 results in the very inefficient use of zoned and serviced land, and in our opinion, is contrary to Section 28 National Ministerial Guidelines.

Conclusion

Cairn welcome the opportunity to make this submission on the Bray Municipal District LAP and support the majority of policies and objectives in the Draft LAP.

It is Cairns opinion that despite the recent review of the Enniskerry LAP, that this process offers an opportunity to update the policies and objectives within it to reflect recent Census data and help address the current housing crisis in Ireland. Cairn do not advocate zoning of additional land but feel strongly that the Local Authority have a responsibility to make efficient use of the existing appropriately zoned land. Cairn believe that the low-density restrictions in the Enniskerry Draft LAP, fail to comply with national planning guidance. It is our belief that a density of 20 – 35 units per hectare would be a more appropriate density, and would help ensure the proper and sustainable development of the area. It is also our opinion that policies and objectives relating to AA3 are overly prescriptive and lead to inefficient use of urban land. It is therefore requested that the cap of 105 units be removed

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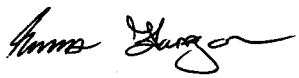
from AA3 and normal development standards applied to guide the sustainable future development of that land.

Finally, Cairn are concerned that a number of the policies, including R6 and R7, are overly prescriptive and propose a number of amendments to these policies which deliver the Council's objectives but allow for a more flexible delivery and more efficient use of urban land.

We trust that this submission is carefully considered by the Local Planning Authority and respectfully request that our recommendations are reflected in the new LAP.

Yours faithfully,



Emma Flanagan MIPI MRTPI

Town Planner

For and on behalf of Cairn Homes PLC

C 45

WICKLOW COUNTY COUNCIL
05 SEP 2017
Corporate Affairs

Mr William D. & Mrs Ann T. Camlin
35 Giltspur Wood
Bray
Co. Wicklow
A98 C786
billcamlin@eircom.net

BRAY MD LAP

Enclosed is our submission regarding rezoning of lands of Oldcourt House Bray Co. Wicklow

William Camlin
A Camlin

Wicklow County Council
05 SEP 2017
PLANNING DEPT.

Mr W.D.& Mrs A.T. Camlin
35 Giltspur Wood
Bray
Co. Wicklow
A98 C786

billcamlin@eircom.net

September 3rd 2017

THE PROPOSAL TO REZONE LANDS OF OLDCOURT HOUSE

BRAY MD LAP

Dear Sir/Madam

It has been brought to our attention that Wicklow Council is planning to rezone land adjacent to the estate in the grounds of Oldcourt House. As per usual this information was not conveyed to the residents but was buried in the small print of the Bray Municipal District Local Area Plan 2017-2023.

We have been residents since the estate was completed in December 1996. At that time, there was a proposal that a river walk in this area would form part of the estate but this proposal never transpired and the area was fenced off.

What has changed for the land to be opened up?

The estate is now well established and many residents have been here from the start. It was the design of the closed Cul de Sacs of the estate that attracted many. It is a safe secure estate and the children play safely. One only has to take a walk around to see how well the estate is looked after.

There was severe disruption when the last cul de sac was opened up and a number of accidents occurred.

However this rezoning will result in building works on a much larger scale?

The access point to the proposed development in this case is relatively small. Do the Developers intend to take a large part of the open space which we fought long and hard for?

For reference there is a sharp bend to the right on entering the estate then a steep incline down the hill and then a sharp, tight turn left into the proposed Cul de Sac for entry. I question will the remaining open space outside the boundary of the development be used for the parking of heavy machinery building materials etc thus taking away the open space that the residents and children of the estate use as a focal point for socializing. This open space is hilly with a path that runs down to the Cul de Sac and many a child including my grand children have enjoyed freewheeling on their bikes, skateboards and roller blades. There are also trees in this area which the children utilise. Kids will be kids and all this will be like a magnet to them no matter what you tell them will they have to be housebound.

The estate will become less secure as there will be easier access through to Charnwood and beyond a nightmare for parents with young children who play freely on the estate.

Within the development, there will a loss of green space around the 600 year old protected structure on the land. There will be disruption to any wild life on the land. Will the stream that runs through the development become contaminated or are there other plans for this.
Will this Development leading to flooding at the site or elsewhere?
Though this "green space" is not accessible from the estate it adds to the visual amenity.

There has been mention of twenty units what guarantees are in place to stop this escalating to a hundred plus.

Will it be part of the estate or a separate estate?

Why are the Council been so secretive. They will argue they have done there statutory duty and that there is a housing crisis. Wicklow Council has been in the press a lot for all the wrong reasons.
The Council are supposed to represent the people, if it was not for the due diligence of one or two councillors we would have not known about this till the bulldozers arrived.

Who came up with this proposal and why now after twenty years? Have any environmental officials visited the estate or do they just see it as a dot on a map. We all know of empty lands around the town, the Dell sight has been empty for years, the housing project on Bray Golf club lands has been dragging on for years, the old Heaton's store has been lying empty. The Florentine Centre project has been going on twenty years; nothing is being done about these matters.

It has been stated that a Lidl store is to be built on one of the long standing empty sites AO Smith whilst any new business is good for the town it is not urgently required. There were proposals to build a supermarket on the Southern Cross which is much needed but it has never happened.
We mention the above as this proposal seems to be on a fast track and as stated buried in the detail of the draft plan.

Who owns the land? Is the Council going to benefit by having Social Housing as part of any deal. Or is it all Social Housing which would raise other issues.

Where does one draw the line if this goes ahead? Will the Council start claiming the open spaces in estates as an easy option?

Don't get us wrong, people have a right to housing but in providing this should it be detrimental to the residents already in place. The lack of information gives us serious cause for concern about the impact it will have on the estate.

There is an environmental issue here already .There has been a tendency to cram as much housing units as possible into a small place. Oldcourt Park itself has changed dramatically over the years with many units been added resulting in the Council making part of it one way because of the volume of traffic. **This means we have only one legal access point from the estate.**

Do the Council plan to return the Soldier's Road to two way traffic if this development goes ahead as all this construction traffic and subsequent new traffic will compound the traffic situation. If it stays the same it will become a nightmare for the residents of Oldcourt Park who live on the section between the roundabout/entrance to the estate and the traffic lights. Will the traffic lights be retimed to allow longer turning time?

What about the residents who live along the Cul de Sac to them what was a small narrow road will become a major access point. This no doubt will impact on the value of their property. How will access and parking to their homes be affected?

How many of the councillors who will vote on this will, come and visit the estate and more importantly take time out to speak to residents.

No doubt it will be argued that if it does not go ahead then it will become an issue in another part of the County which may have a bearing on how the Council vote will go. However common sense has to prevail. Let it be proved that this rezoning will be of benefit to the estate and no impact to the residents of Giltspur Wood and Oldcourt Park.

Has or will an Environmental study be carried out for this development, the removal of foliage and trees. I'm sure this will have a negative effect on the Eco balance of the estate.

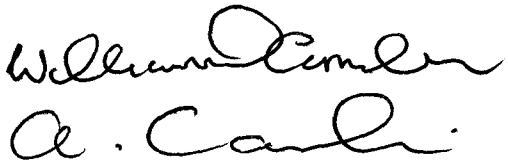
No doubt a large swathe of the open space will be removed to facilitate construction traffic and a new road layout. As has been stated above the present road system will not support what is proposed.

There has to be sufficient room for the parked cars in the established houses of the Cul de Sac sufficient room to allow free flowing traffic in both directions. The ease of access for Emergency vehicles, Refuse trucks, delivery vehicles etc. There is also the 1 or 1.5M ruling regarding cyclists.

As stated we have lived here for twenty years and have watched children who are now adults grow up and play in a safe environment and watch history repeating itself. **We strongly object to this proposal due to the negative effect we believe it will have on the Estate and Oldcourt Park both during the construction and in particular afterwards.** We know from experience what it is like to live on a building site i.e. the constant coming and going of large trucks, heavy machinery constantly on the move, the mud, the dirt, the noise. Our home was one of the first to be completed and we watched as the estate grew up around us.

Yours Sincerely

W.D.& A.T. Camlin



C 46

Leonora Earls

From: erica devine
Sent: 14 September 2017 11:53
To: Planning - Plan Review
Subject: Submission to Wicklow County Development Plan 2016-2022
Attachments: new submission to WCDP to 2022.docx

Dear Administrative Officer,

Please find attached a submission in relation to the WCDP 2016-2022.

Regards
Erica Devine on behalf of the Carlisle Grounds Residents Group

To: The Administrative Officer, Wicklow County Council.
From: The Carlisle Grounds Residents Group
Re: Bray Town (Wicklow County Development Plan 2016 – 2022)

14th September 2017

Dear Administrative Officer,

We wish to make the following submission to the Wicklow County Development Plan 2016-2022. Our concern is the protection and maintenance of sporting amenities and good future planning within the town of Bray.

"We'd envisage the Carlisle Grounds having 350-400 apartments. What we would propose is building these apartments with a certain percentage sold.

"The percentage sold would cover the building costs of the new facility and the remaining unsold units would be kept with the rental income paid into a new trust which we are going to form."

This is an excerpt from correspondence set out by Bray Wanderer's chairman (now Gerry Mulvey, a well known developer) to Wicklow County Council where he specifies the outcomes of any potential rezoning of the Carlisle Grounds. Supposedly, most of the apartments, which could be up to 500, will be sold to fund a large modern sports centre ("somewhere West of the N11" but not specifically in the Bray or even Wicklow area) and the remaining units will be kept for rent revenue (at top market rate no doubt) to generate profit to be paid into a trust to fund the future of the same privately owned and controlled centre – if this goes forward. In short any rezoning or removing of protections around the Carlisle Grounds will lead to speculative development on behalf of private licence holders to consolidate and maximise financial benefit to themselves at the cost of the loss of the publicly owned facility and, given recent turbulence in the club, a dubious future for the re-investing of funds elsewhere into private ownership. Rezoning the grounds or extending the powers of the current licence holders over the grounds will be the first step in bringing about this deleterious and irreversible scenario in Bray town. If an example is needed of how this has played out on a similarly questionable basis, as a mere licensee becomes private profit based owner of a public facility in Bray, we need look no further than the

Barracuda debacle which has seen a publicly held seafront facility become a privately owned commercial entity with a detrimental cost to the public good going into the future. If Bray town, which is all about the seafront, is subjected to the effects of such a mistake to be made in relation to management of public assets, we can legitimately fear how this prospective licensee/developer/owner situation will play out around the Carlisle Grounds. This was a point underlined by the Bray Town Council Chairman and Bray town councillors during public meetings in 2016/2017. The contradictory and obfuscating statements issued by Bray Wanderers' chairmen regarding their intentions over the Carlisle Grounds, has only served to further erode our confidence in the owners of Milway Dawn Ltd as suitable partners in any public/private scheme now and in the future. Bray Wanderers as a team, or other sporting teams, could easily stand to lose both the use of this historic sports facility and fall between the cracks of privately driven deals and vested interests should any rezoning step be taken in relation to the grounds.

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

We wish to make you aware of a number of further specific objections that we have with regard to the proposed rezoning and subsequent development of housing on the Carlisle Grounds, as noted in the Local Area Development Plan. As Bray residents and members of the awareness group Save The Carlisle Grounds (membership 223), we are of the view that the proposed development will have a serious impact on the quality of life of the townspeople of Bray. We believe that any proposed rezoning of the Carlisle Grounds would lead to developments

that do not respect and are in direct contravention of the Council's own long term planning guidelines and objectives and of national planning guidelines and objectives including, among others, the following:

- Wicklow County Play Policy 2016-2022, 2011-17
- County Wicklow Sports and Recreation Policy (DRAFT), 2004
- National Spatial Strategy 2002-2020
- Ready, Steady, Play-A National Play Strategy 2004
- National Action Plan for Social Inclusion 2007-2016

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

The Vitality of the Town Centre.

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

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

Recreation

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

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

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

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

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

Open Space

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

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

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

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

Sport

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

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

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

Social Infrastructure

"The provision of 'social infrastructure', in the form of buildings, facilities, clubs and the ***means of accessing and using services,*** *is necessary for the development of sustainable communities. The purpose of such infrastructure is both to provide a service and also to promote community cohesion and community identity and in doing so combat social isolation and alienation. A wide variety of facilities are required in order to have a functioning and developing society, and one's use of facilities will*

dependent on a range of factors including age, family structure and physical ability. Essentially there are four broad categories of facilities:-

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

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

Population Density and the Planned Growth of Bray

"The following standards apply with respect to the development of new high density residential zones per 1000 population:

1.6ha outdoor play space (pitches, courts, sports grounds) - 0.6ha casual play spaces (parks) - 0.2ha equipped play space (playgrounds and MUGAs)."

We would expect the standards which Wicklow County Council demands of new residential developments should equally apply to the pre-existing town community and we find any proposed retrograde step disturbing. We would like to know what underlies and justifies the differing standards that seem to be called into play in this scenario. Given the fact that Bray is defined as a Metropolitan Town Centre, with significant land in the environs due to be rezoned for housing development, we strongly question why this relatively small piece of open space which is so important for our community should, in this context, fall prey to rezoning while under the control of a company owned by people involved in property development. The provision of a long term lease to the Barracuda followed by its sale to the lease holders is ever present in our minds.

Conclusion

We believe the proposal to contravene this guidance as it is to the detriment of the quality, character and amenity value of the area, as outlined in the points above. We note that the Carlisle Grounds are the only potentially multiple use publicly owned sporting grounds in Bray town centre. We believe that the road network leading into and out of this part of Bray is already significantly stressed and could not sustain the added volume of vehicular traffic that housing development on Carlisle Grounds would contribute. The Dart line and bus services will not compensate for this. We would be grateful if the council would take our objections into consideration when deciding any potential rezoning. We would welcome the opportunity to meet with a representative of the planning department to illustrate our objections at first hand.

Sincerely,

Erica Devine
Liz Ferris
Seana Kevany

On behalf of the Carlisle Grounds Residents Group

C47.

MICHAEL CARROLL
Glenherbert, Dargle Road, Bray, Co. Wicklow.

Architectural & Energy Design
SEAI register BER assessor

E-mail:

DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

Dear Sirs,

With reference to the draft BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023 I would be grateful in you would consider allowing the provision of smaller living units than currently permitted.

Smaller living units if well designed and laid out would provide comfortable living at an affordable price to many sections of the population.

For instance, in the USA Boston's "Factory 63" has apartments of 35 sq. meters, Washington DC's "Moda 17" has units of 33 sq. meters, The "Turntable Studios" in Denver has units of 31.5 sq.meters and San Francisco's "Panoramic" has units of 20.5 sq.meters and there are many other examples across the United States.

A size of about 40 sq.meters should provide, if carefully thought out, would provide a high quality of living for residents.

On the other hand, the maximum floor area of 45 sq. meters allowed for a "Granny Flat" should be revised and any "Granny Flat" should be allowed to cater for an independent lifestyle which should include the capacity to allow for the overnight sleeping of a companion or the regular sleeping of a carer, depending on the circumstances of each individual. It is possible to provide an well integrated extension greater in area than an existing house and likewise it should be possible to provide a large "Granny Flat" of any size if the circumstances call for it.

As is the case now, a "Granny Flat" would always be an extension to a dwelling and would not, nor could not, be viewed as a separate individual unit.

Yours faithfully,

Michael Carroll

Michael Carroll

C48

Leonora Earls

From: Melissa Carroll
Sent: 05 September 2017 12:40
To: Planning - Plan Review
Subject: Objection regarding rezoning of lands of killruddery estate bray

Dear Sir/Madam,

I wish to submit my objection to the proposal to rezone lands in the killruddery estate and Southern Cross in Bray Co. Wicklow.

I think it is an absolute disgrace to consider rezoning rural lands when there are 3 large derelict industrial sites on the boghall road that should be rezoned for housing or redeveloped for industry. May I also highlight the fact that one of these sites AO Smiths has been vacant for nearly 20 years.

Also, as a resident of the southern cross, the traffic on the road is already horrendous and it is impossible to turn right when leaving the estate and very difficult to turn left also due to the high volume of traffic already.

Regards,

Melissa Carroll

Sent from my Samsung Galaxy smartphone.

C 49

Winnie Chan
96 Giltspur Wood
Bray,
Co. Wicklow
Date: 12/09/2017

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

Winnie Chan

Howard Tsang
96 Giltspur Wood
Bray,
Co. Wicklow
Date: 12/09/2017

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

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Sincerely,

Howard Tsang

C 50

Wicklow County Council
13 SEP 2017
PLANNING DEPT.

40 Giltspur Wood
Bray
Co Wicklow
11 September 2017

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

BRAY MD LAP

Dear Sir/Madame,

I'm writing to you to object to the proposed rezoning of the lands at Oldcourt Castle in Bray, Co Wicklow.

These are several reasons why I think this rezoning should not go ahead and I have outlined a few below.

1. Health and safety – Giltspur Wood is a quiet residential estate with a lot of young children. The Additional traffic that additional houses would bring is a huge concern. We have had an extension to Giltspur Wood in the past and there were a lot of problems and accidents involving children including a head injury.
2. Breaking through an existing Cul-de-Sac – This is not acceptable. Is every Cul-de-Sac at risk of this in the future?
3. Oldcourt Castle – this is a site of huge historical interest.
4. Wildlife and Green Space – There is a preservation order on some of the trees on the land in question, not to mention the wildlife including bats which are also protected.

I hope you will consider my objection seriously.

Yours Sincerely

Lucy Chand.

13 SEP 2017

C51

40 Giltspur Wood
Bray
Co Wicklow
11 September 2017

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

BRAY MD LAP

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4. Wildlife and Green Space – There is a preservation order on some of the trees on the land in question, not to mention the wildlife including bats which are also protected.

I hope you will consider my objection seriously.

Yours Sincerely

Olivia Chand.

C 52

40 Giltspur Wood
Bray
Co Wicklow
11 September 2017

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

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I hope you will consider my objection seriously.

Yours Sincerely

Sophie Chamel

C 53

40 Giltspur Wood
Bray
Co Wicklow
11 September 2017

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

BRAY MD LAP

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I hope you will consider my objection seriously.

Yours Sincerely

S Chand

Leonora Earls

C 54

From: Colin Clarke |
Sent: 14 September 2017 22:57
To: Planning - Plan Review
Subject: Proposed re-zoning in Kilruddery

Dear sir/madam,

I wish to log my objection to the proposed rezoning of land in Kilruddery.

My objection is based on the lack of information forthcoming, the lack of an environmental impact assessment on the surrounding area, the lack of information to the additional infrastructure requirements to facilitate this proposal.

Yours sincerely,
Colin Clarke
13 Earlscroft
Bray
Co Wicklow

C55

Lisa Rothwell

From: Dee Oneill
Sent: 08 September 2017 18:56
To: Planning - Plan Review
Subject: Planning objection

Hello I live in 43 swanbrook and I strongly object to the planning of 240 houses in the kilruddery estate.. it will cause traffic mayhem in the surrounding estates ... the traffic in that area is already crazy.. Deirdre clarke

C56

The Administrative Officer,
Planning Section,
Wicklow Co. Council

10th September, 2017

Re: BRAY MD LP

Dear Sir/Madam,

Only thanks to the vigilance of a local councillor have we become aware that in the latest Bray Draft Development Plan 2017 an area of 1.5 ha surrounding Oldcourt House and Castle is zoned R20.

As residents of Giltspur Wood which adjoins this area it never crossed our minds that this particular small green space adjoining "Giltspur Wood" could ha[illegible] zoned residential or anything else aside from remaining green; Bray is [illegible] have this unique valuable woodland which a so includes an historical [illegible] on its doorstep.

Staggeringly - instead of embracing the opportunity to add to it - It has been zoned residential!!! It is nothing short of criminal.

The site is sandwiched between Oldcourt House and 2/3 well established housing estates and at quite a distance from main routes, To just add a narrow green strip within whatever plan would just be laughable if it weren't so serious and in no way could replace the environmental and ecological loss to the area.

Should this site be built upon it would appear that either one or both of the established estates would have to be used as access to develop this land, removing cul-de sacs. It doesn't bear thinking about. To subject a long established estate such as ours ,with extremely narrow roads, green spaces where children play on a regular basis, to constant building traffic would be totally irresponsible. Following completion then, one, either or both of the estates would have to endure the extra traffic from the addition of 30 extra houses plus a more than likely loss of green space.

Besides all this, those people who would have deliberately purchased their houses at the end of cul-de-sacs out of choice, would find themselves with

passing traffic and very likely a loss in value to their houses. In my view they would very rightly expect compensation – an unnecessary expense.

There are endless more suitable and more accessible empty spaces in Bray on which to build houses. This site is so small, so out of the way and would cause so much trouble and inconvenience to current residents, not to speak of undoubted extra costs to construct on because of total unsuitability of the site that it makes me wonder if there is some sort of "skull duggery" going on. It simply does not make any sense.

As you have gathered we are **absolutely against** any construction development on this site. It has to be kept as a green site and if anything added to the existing woodland (even if not available to the public). More than ever we need to keep our **green spaces:they are as necessary as houses.**

I would also like to observe that the publication of this document in the height of the holiday season with a closure date mid September when many people are very much engaged with sorting out schools, colleges etc, is disgraceful and smacks very much of hoping for as little comment as possible. This date should be extended with abundant notification to the public.

Yours sincerely,

Janet and Umberto Cocchiglia
20 Giltspur Wood,
Bray,
Co. Wicklow

C 57

RE: Proposed Re-Zoning of 2 Plots of Land at Rear of Charnwood & Giltspur Wood
R20.

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) Margaret M. Cavanagh. Date Sept. 8th 2017.

Residents' Address 172, Charnwood, Vevay Rd. 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. Margaret M. Cavanagh

Address in Charnwood 172 Bray (Your address must be included)

WICKLOW COUNTY COUNCIL
12 SEP 2017
Corporate Affairs

C58

Leonora Earls

From: cg housing coop [c
Sent: 14 September 2017 22:05
To: Planning - Plan Review
Subject: Submission - Bray municipal district local area plan 2017 - 2023

Madam, Sir,

We are writing to you following the publication of the draft BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 – 2023.
We are a group of families and individuals based in Bray and North Wicklow who have come together to form a housing cooperative and we believe we have innovative ideas that could help you follow your vision and achieve your plan.

It is our intention to create an affordable, inclusive and not for profit pilot project to house our members. Our housing cooperative will match several important criteria of the plan, especially regarding residential development, social and community development and the preservation of the Natural Environment.

Residential development integrated with community development:
We aim to build integrated, cooperative, affordable homes in which owner and tenant members of the coop live side by side and share common amenities. Our group comprises 12 households with potential to expand depending on the size of the site. We have a waiting list of 60 households. Our project focuses on providing members of the coop with community spaces (kitchen, laundry room, meeting room, space for workshops etc.), shared vegetable gardens, a playground for children, a recreational area for teenagers and young adults.

Social and community development:
We aim to develop a space that will be a centre for the local community and provide various services. We are part of Common Ground which is a grassroots community based project in North Wicklow committed to practical actions to promote a cooperative, mindful and ecological lifestyle. We aim to provide a network and a space to help people support each other in sharing their skills and source healthy and sustainable food.
We believe our cooperative can become an education centre offering skills and development models to be shared around the town, the county and the country.

Natural environment:
We aim to run the coop on ecological and sustainable principles. A-rated or passive houses, minimum waste policy, use of alternative energies and local food production are core aspects of our project. We also aim to respect the local biodiversity and promote our local environment and heritage.

Our partners:
To achieve our goal we are working with Hugh Brennan from O'Cualann Co-Housing Alliance, an approved housing body which is already working with county councils. Their project in Poppintree recently appeared in *The Irish Times* as a model for affordable housing. We are also working with Housing Cooperative Ireland to finalise our financial model.

Possible locations:
We have identified in the plan a few locations that may suitable for our project: Killruddery, Oldcourt House and Oldcourt Castle.

Looking forward to hearing from you,

Kind regards
Common Ground Housing Cooperative

Contact details:
Email address : [illegible]
Website : [illegible]

C59

Leonora Earls

From: Lynda Conneely
Sent: 04 September 2017 12:29
To: Planning - Plan Review
Cc: Deputy Simon Harris T.D.; Deputy John Brady; Cllr. Pat Casey MCC; Deputy Stephen Donnelly T.D.; Cllr. Shay Cullen; Deputy Andrew Doyle T.D.; Gail Dunne; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC
Subject: Proposed re-zoning of land in Killruddery, Bray

I wish to advise that I object to the Draft Plan for the proposed rezoning of land in Killruddery, Bray.

My objection is based on the lack of public consultation.

Regards,

Lynda Conneely
22 Earlscroft,
Southern Cross Road,
Bray,
Co. Wicklow

C60

Leonora Earls

From: Honor Connell [' com]
Sent: 03 September 2017 21:09
To: Planning - Plan Review
Cc: Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC
Subject: Bray MD LAP

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

Dear Sir/Madam

We write to oppose the rezoning of lands in Killruddery as proposed in the Bray Municipal District Draft ocal Area Plan 2017 ("the Plan"). Having reviewed the details of the plan, we wish to make our objection on the following basis:

Traffic Issues

Over the past 20 years of living in Deepdales, the traffic on the Southern Cross Road ("SCR") has gotten progressively worse, to the point now where, at certain times of the day, it is extremely difficult to to safely exit our estate. Particularly when turning right. The 'Woodies' and Killarney Road roundabouts cannot handle the current volumes of traffic, as evidenced by long tailbacks on the SCR at certain times of the day. It only takes an incident on the M/N11 north or south and gridlock sets in in the area. The whole of Bray, let alone the SCR, cannot handle the current traffic volumes, let alone increased volumes that come part and parcel with additional development in the area that may come about should the rezoning go ahead. The road objectives stated in Section 8.1.5. of the Plan do not contain anything definite to address the current or future traffic issues. A lot is dependent on funding being made available to carry out a major upgrade of the M/N11 and junctions 5,6 and 7 in particular. The SCR is not mentioned much in the context of addressing local traffic issues.

menities

For so many houses on the SCR, there is not even a shop to walk to buy a paper or a pint of milk. We have heard so many times over the past 20 years that a local shopping development would be built on the SCR, but nothing has materialised to date. Residents of the SCR, particularly older residents, therefore have to drive to the nearby shops in Bray, Greystones and further afield, to do some shopping which only adds to the traffic problems in the area. An additional 240 houses in Killruddery, as proposed in the Plan, will only exacerbate matters.

Public Transport

The public transport options available to residents of the SCR are limited. The 84X Dublin Bus peak hour, Monday - Friday, service is excellent for the SCR, Greystones and Kilcoole but we believe there is a case for running the service throughout the day. Perhaps at hourly intervals in order to provide a fast and efficient route to Dublin City centre. The 145 route is more frequent but terminates at one end of the SCR. It should be extended to the Vevay Road end too. The Finnegan bus service is not the service it used to be when we moved here first. It provides limited access to the DART and Main Street. The public transport options mentioned in the plan consider LUAS/ BRT etc. but appear to concentrate on Fassaroe and Main Street and

DART Station area. Not much mention of the SCR area so it doesn't appear to needs of the residents of the additional 240 housing units or the expanded business park are catered for from a public transport point of view. This will only result in reliance on car transport leading to more traffic.

Drainage/ Flooding

We know that many residents along the SCR have encountered drainage/ flooding issues over the years. Whether that be form the Swan River or from the land drainage itself. We would be wary of any development on the Killruddery lands, particularly at a higher elevation then the SCR and the estates bordering Killruddery, that could interfere with the natural drainage of the land and pose a flooding risk for residents and businesses in the area.

General

Killruddery is a marvelous local and tourist amenity. As members and regular walkers of the estate, we appreciate the natural amenity and all the wildlife it sustains. To develop the land would be a shameful loss and irreplaceable. We appreciate that Bray is expanding and know there is a countrywide housing crisis but feel there are enough alternative sites available to provide the necessary housing. Fassaroe is one area that is mentioned extensively in the Plan. Although not part of this Plan, there is also housing development planned at Woodbrook. The impact of this on the infrastructure of Bray should also be considered when deciding the future plans for the town.With all of this proposed development, one has to question the need to include development at Killruddery too.

The Killruddery estate also needs to keep functioning as is and look to further develop further business in the estate to help sustain it for the future. We believe the estate are looking to use its existing planning permission already granted for low density housing along the perimeter of the estate. This kind of development would be more in keeping with the ethos of the estate. There are currently several former commercial sites around Bray that could be developed for housing (e.g. the Dell site, area around the back of Aldi and the awful derelict A.O.Smith site). This type of potential development is mentioned in the Plan but more definite plans need to be considered.

Back to Killruddery, why overdevelop one of the best amenities, not only in Bray, but in the whole county and indeed the country. Think of the the tourism industry and what Killruddery could bring to the local economy. Already Hell & Back, Groove, Farmers Market and location filming are part and parcel of the Killruddery business. Imagine a walking route from Killruddery linking in with the Sugarloaf Way and onward to the Wicklow Way. This may not be possible if the land is developed for housing.

Having lived here for almost 20 years we have always felt that the SCR has been neglected by both Wicklow County Council and the previous Bray Town Council over the years. Hedgerows are not always cut and when they are the litter exposed when cut is not picked up. The road itself is not maintained well with a poor surface and line painting not maintained regularly. We don't believe the proposed rezoning of lands around the SCR will actually lead to any improvements in the area itself.

Finally, it seems a shame to consider building higher than the current buildings on the SCR. If you stand on the top of Killiney Hill looking south, Deepdales and the SCR Business Park are clearly visible with the fields of Killruddery on the slopes of the Little Sugar Loaf. Bray's natural beauty consisting of both Sugarloaf mountains and Bray Head would be compromised by additional development is allowed at a higher elevation as suggested in the proposed rezoned lands.

We hope you can take our objection into consideration. Our property adjoins the Killruddery estate at the western end of Giltspur Lane so the proposed rezoning of the lands and the future of the estate is of great concern to us..

Honor & Gerry Connell
107 Deepdales

Southern Cross Road,
Bray,
Co. Wicklow

C61

Carmel Connellan
51 Giltspur Wood,Killarney Road,
Bray, County Wicklow
c

8th September 2017
The Administrative Officer, Planning Section
Wicklow County Council
County Buildings, Whitegates, Wicklow Town.

Ref: "Bray MD LAP" Rezoning of land at Giltspur Wood, Bray

Dear Sir/Madam

Reference above, I am writing to oppose the rezoning of lands above.
My main objections are as follows:-
Health and Safety:

- 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 prior building in another cul de sac in our estate in 2001/02 and there was a number 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.
- The area under construction would be a playground for the small children
- It would involve breaking through an existing cul de sac
- The traffic entering and exiting the estate on Soldiers Road is already congested and any additional traffic would only exacerbate the problem. This is a really serious problem during school term times.

General:

- Loss of green space (trees, various species of wildlife etc) if the land is rezoned
- There would be an additional loss of green space in our existing estate to facilitate traffic to the new housing development
- There is a 600 year old protected structure on the land in question.
- There is a tree preservation order on the trees on the land in question.

I contracted to buy my home in 1997. At that time, I accepted I would be living on a building site for 12 months or so until all homes were completed. That indeed was the case until there was supplementary building in a cul de sac close by in 2001/02. That caused havoc with construction traffic, muck everywhere and rats running across the tops of the dividing fences.
We were lucky more children were not injured on that site and those who were, sustained quite serious injuries.
In addition, given the proximity of the road to the large green area, which is the children's main play area, we had the constant fear of more accidents from the construction traffic.
ɔw, today, we have the next generation of children safely playing on that green and cul de sac and residents of my tenure have our families reared.
My home faces the green and overlooks Oldcourt Castle, the protected structure on that land. I am aware of residents who bought their homes over the past 20 years specifically because of that green space and cul de sac seeing it as a safe place for their children to play and for them to rear a family.
The loss of green space in the estate and indeed the loss of that cul de sac would have a direct negative impact on the quality of family life in the estate.
Personally, I have a *serious medical condition which will necessitate monthly cycles of treatment over the next* 3 years at a minimum. Given the proximity of my home to the proposed rezoning land, I know if this rezoning goes ahead, I will be living on a building site. It's ironic, that at a time when I should and need to be in a safe supportive environment, I could be forced out of my home to protect my health.

If you need any further information, please do not hesitate to contact me.
Yours faithfully

Carmel Connellan

Contact details for Carmel Connellan:

Address:
51 Giltspur Wood
Killarney Road
Bray
Co. Wicklow

Phone:
0

Email:

C62

Jennifer & Gavin Connolly

12 Giltspur Wood

Killarney Road

Bray

Co. Wicklow

Administrative Office,

Planning Section,

Wicklow County Council,

Station,

Wicklow Town

RE: BRAY MD LAP 2017

Dear Administrative Officer,

We are writing to make an objection to the proposed rezoning of land adjacent to Oldcourt House and Giltspur Wood from OS4 to R20, as described in the Bray Municipal District Local Area Plan 2017.

The zoning as open space is in accordance with the current council policy to protect important natural wildlife habitats. We would agree with current policy that the preservation of this part of the Swan Valley as a wildlife corridor is extremely important to the future of our town. There are too few areas within the urban centre where wildlife can thrive and we see it as a huge threat to local biodiversity if this wooded area is intruded upon to build residential units.

The land also has a tree preservation order (TPO No.5 and No.10, Table 8.2, Bray Town Development Plan 2011-2017), to protect trees which are of conservation or amenity value. We walk along the site often with our daughters and are in no doubt that the trees which grow beside the castle are worth conserving.

It is really quite shocking that grounds directly adjacent to Oldcourt Castle, which is rightly a protected structure, would be proposed as suitable for building residential housing. There are four protected structures adjacent to the land and building right beside these would ruin their future preservation.

Surely this land gives Bray an opportunity to create a public parkland within the town, which would improve local pedestrian access to and across the town centre and – as an urban greenway – set the bar for other District Councils. Residents, now and in the future, would benefit from a greenway, which are recognised as contributing to the social, economic, environmental and wellbeing of communities.

This wooded area should also continue to provide necessary flood protection of the 1-100 Year Flood zone around Oldcourt river, as identified by the OPW.

We are extremely concerned about the impact of construction on the safety of our children, who play on the green areas which would be impacted by necessary road widening and hugely increased heavy vehicle traffic for upwards of one year. There are dozens of children who use the greens and the relative safety within Giltspur Wood as their playground, essentially; it would be most concerning to have this turned into the access point for a large construction site, with all that entails.

At present there is already a large amount of traffic as a result of the recent changes in direction to the flow at Soldiers Road, as well as the development at Castelyn. A new estate would exacerbate this further.

We appreciate that there is a need to build residential units In Bray but strongly believe that there are better and more appropriate sites within our town, from the perspective of the environmental impact, the increased flood-risk, and the irreversible damage to historical structures which rezoning this land would result in.

We would ask you to consider our submission and objections and prevent the rezoning of this land, which is inappropriate for residential development.

Yours sincerely,

Jennifer and Gavin Connolly

C63

Leonora Earls

From: Joey Connor [j
Sent: 11 September 2017 21:27
To: Planning - Plan Review
Subject: Submission re: Bray Municipal District Local Area Plan 2017

Re: Local Area Plan 2017-2023 & The proposed rezoning in the Kilruddery / Southern Cross area of Bray.

From: Joe Connor & Lisa Kearns, 41 Hollybrook Park, Southern Cross Road, Bray, Co.Wicklow.

Good afternoon,

We would hereby like to officialy object to this proposed rezoning as set out in the "BRAY MUNICIPAL DISTRICT DRAFT LOCAL AREA PLAN 2017" in it's current format.

We would like to take this opportunity to point out that we understand and support the need for an increase in housing stock within Bray, and we are not against progress, however we feel the need to object to this DRAFT plan in it's current format for the following reasons:

Traffic Concerns: The lack of a traffic management plan for the already congested Southern Cross road.

Access issues: Suggested access through two established estates

Flooding: Development on such a large scale in this area will add to the already unacceptable flooding at the rear of Hollybrook park.

Affects on the natural heritage and tourism related sector through over development.

Insufficient amenities on the Southern Cross as it is, previous promises from developers not followed up regarding the provision of much needed amenities in the area.

Green area in Hollybrook and the proposed cycle way, this will no doubt lead to the removal of trees thus increasing the already unbearable noise from the current industrial area. The potential for increased anti social behaviour should this become a thoroughfare for other new residential estates

The obvious devaluation of our home.

Increased pressure on waste water facilities and water pressure for current residential areas.

The fact that there are large areas of already zoned and undeveloped industrial and residential areas on the Boghall road and in Killruddery.

Zoning for more industry behind existing housing estates, is in our eyes a poor fit and would lead to increased noise and traffic.

These are some of our current concerns and are in no way exhaustive.

Kind regards

Joe Connor, Lisa Kearns and family.

C64

Leonora Earls

From:
Sent: 11 September 2017 22:06
To: Planning - Plan Review
Cc: simon.harris@oir.ie; Cllr. Joe Behan; Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; olobrian@gmail.com; jryan@greatplacetowork.ie; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; liadh.niriada@ep.europa.eu; Cllr. Brendan Thornhill
Subject: Bray MD LAP

Ger Conroy
136 Hollybrook Park
Southern Cross
Bray
Co Wicklow

11 September 2017

Regarding the part rezoning of land at Kilruddery estate on the Little Sugar Mountain, a meeting took place in the Royal Hotel in Bray on Wednesday 30th August 2017 to discuss with the residents of the estates on the Southern Cross that are affected. A number of councillors attended, Joe Behan, John Brady TD, Simon Harris TD & others, along with Anthony Brabazon from Kilruddery estate.

I **object** to the part rezoning of land in Kilruddery estate on the Little Sugar Mountain on the following grounds:

1.Natural Amenity and Surroundings.
As is stated on the Wicklow co co website Kilruddery and the surrounding area is of natural beauty and to add residential and employment buildings would destroy this natural beauty and if this rezoning were to succeed where does this leave us for future rezoning?

2. Residential and Employment.
I am aware of the housing issue in Bray, and I am not against residential housing, however there is better areas for rezoning in Bray e.g. Fassaroe & the Old Golf club where there is existing amenities to support more houses.
Southern Cross does not have sufficient amenities to support another 240 houses along with Employment buildings. They are empty buildings on the Boghall road e.g. Dell, where industry is much more suited. What is being done to reuse some of these vacant buildings for potential industries and employment?

3. Traffic and Public transport.
Currently on the Southern Cross route there is already **serious** traffic congestion, which is worse at peak times where it is like a slow moving car park. I live in Hollybrook Park and it can take up to 10 minutes to cross the road be it on my bike or in my car to get into the town of Bray in the mornings on a daily basis. As far as I can see this is not being taken into

consideration where there is potentially another 300/400 cars extra using this road several times a day.
Regarding public transport there is a couple of Dublin buses 84x morning and evening to bring people to Dublin, a decreasing Finnegan's bus service that bring people to the town of Bray. There is a Dublin bus 145 service at the end of Southern Cross which on average is a 20 minute walk. Mostly people have to get in their car's to get to their destination leading to more traffic on this road. There is already 7 residential estates, the business park & Retail Park and traffic from Bray & Greystones etc, other parts of Bray have a better public transport system.

4. Flooding.
Flooding is a real concern to me. Currently with any heavy rain, my back garden is flooded several times of the year (I have photographs to back up this statement). In Hollybrook, you have the main stream and another small stream flowing through the woodland area which is water coming down from Little Sugar Mountain. More residential and commercial buildings will only make this worse.

5. Amenities promises in the past not fulfilled.
When I moved to Hollybrook park on 1997, the woodland area was to be completed and because it was not done it has now resulted in anti-social behavior area as it was not taken over by the county council and managed properly.
There was to be a supermarket etc, better transport services etc and 20 years later we are still waiting. In the rezoning that is planned what is stop builders etc buildings the houses only and basically not completing what is proposed because they run of money?

6. Kilruddery and Access
Kilruddery is a wonderful resource and I understand that they need capital like any business. Anthony Brabazon spoke at the residents meeting, they didn't ask or want this rezoning of this particular part of their land. He has offered other alternative fields, why is this not being looked at as an option?
The access is stated as being through the existing entrance of Kilruddery House, what is to stop this being changed to one of the existing housing estates once the green light has been given?

I hope that my views are taken into account when the councilors review my objections. As I say I am not against residential/industry rezoning and employment for the town of Bray and I understand the need. Just this time where the rezoning is being proposed is the issue!

Regards
Ger Conroy

C65

Leonora Earls

From: MARY CONROY
Sent: 03 September 2017 19:49
To: Planning - Plan Review
Cc: simon.harris@oir.ie; Cllr. Joe Behan; Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; olobrian@gmail.com; jryan@greatplacetowork.ie; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; liadh.niriada@ep.europa.eu; Cllr. Brendan Thornhill
Subject: Bray MD LAP

Mary Conroy
136 Hollybrook Park
Southern Cross
Bray
Co Wicklow

03 September 2017

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I **object** to the part rezoning of land in Kilruddery estate on the Little Sugar Mountain on the following grounds:

1.Natural Amenity and Surroundings.
As is stated on the Wicklow co co website Kilruddery and the surrounding area is of natural beauty and to add residential and employment buildings would destroy this natural beauty and if this rezoning were to succeed where does this leave us for future rezoning?

2. Residential and Employment.
I am aware of the housing issue in Bray, and I am not against residential housing, however there is better areas for rezoning in Bray e.g. Fassaroe & the Old Golf club where there is existing amenities to support more houses.
Southern Cross does not have sufficient amenities to support another 240 houses along with Employment buildings. They are empty buildings on the Boghall road e.g. Dell, where industry is much more suited. What is being done to reuse some of these vacant buildings for potential industries and employment?

3. Traffic and Public transport.
Currently on the Southern Cross route there is already **serious** traffic congestion, which is worse at peak times where it is like a slow moving car park. I live in Hollybrook Park and it can take up to 10 minutes to cross the road be it on my bike or in my car to get into the town of Bray in the mornings on a daily basis. As far as I can see this is not being taken into consideration where there is potentially another 300/400 cars extra using this road several times a day.
Regarding public transport there is a couple of Dublin buses 84x morning and evening to bring people to Dublin, a decreasing Finnegan's bus service that bring people to the town of Bray. There is a Dublin bus 145 service at the end of Southern Cross which on average is a 20 minute walk. Mostly people have to get in their car's to get to their destination leading to more traffic on this road. There is already 7 residential

estates, the business park & Retail Park and traffic from Bray & Greystones etc, other parts of Bray have a better public transport system.

4. Flooding.
Flooding is a real concern to me. Currently with any heavy rain, my back garden is flooded several times of the year (I have photographs to back up this statement). In Hollybrook, you have the main stream and another small stream flowing through the woodland area which is water coming down from Little Sugar Mountain. More residential and commercial buildings will only make this worse.

5. Amenities promises in the past not fulfilled.
When I moved to Hollybrook park on 1997, the woodland area was to be completed and because it was not done it has now resulted in anti-social behavior area as it was not taken over by the county council and managed properly.
There was to be a supermarket etc, better transport services etc and 20 years later we are still waiting. In the rezoning that is planned what is stop builders etc buildings the houses only and basically not completing what is proposed because they run of money?

6. Kilruddery and Access
Kilruddery is a wonderful resource and I understand that they need capital like any business. Anthony Brabazon spoke at the residents meeting, they didn't ask or want this rezoning of this particular part of their land. He has offered other alternative fields, why is this not being looked at as an option?
The access is stated as being through the existing entrance of Kilruddery House, what is to stop this being changed to one of the existing housing estates once the green light has been given?

I hope that my views are taken into account when the councilors review my objections. As I say I am not against residential/industry rezoning and employment for the town of Bray and I understand the need. Just this time where the rezoning is being proposed is the issue!

Regards

Mary Conroy

C66

Leonora Earls

From: Tim Cookson
Sent: 15 September 2017 16:50
To: Planning - Plan Review
Subject: Submission to Bray Local Area Plan

Submission to BrayLocal Area Plan
Tim Cookson
1 Vale Terrace
Bray
Co. Wicklow

This is my submission:

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.

I 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 or our Main Street, town centre and esplanade. This should be a major concern when planning is sought to demolish ANY old building in the town.

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.

C67

The Administrative Officer,
Planning Department,
Wicklow County Council,
Whitegates,
Station Road,
Wicklow Town.
County Wicklow.

WICKLOW COUNTY COUNCIL
14 SEP 2017
PLANNING DEPT.

John Corcoran,
C/O Simon Hart Ltd.,
Unit T 25 Rowan Avenue,
Stillorgan Industrial Park,
Blackrock,
County Dublin.
12-09-2017.

Re : Draft Bray Municipal District Local Area Plan 2017 :

Dear Administrative Officer,

I hereby make the following submission on the Draft Bray Municipal District Local Area Plan 2017.

Page 19 Section 2.2.8 : The content on the built heritage and the natural environment of Bray is welcome, particularly its emphasis on "Protection and enhancement of the Victorian building stock in Bray : and the "set piece that is the sea front and promenade" as well as the "Recognition of the valuable heritage asset that is Killruddery Demesne." The guiding principles of the heritage strategy for Bray Municipal District are also welcome.

H

t

Page 23 Table 3.1 : I am concerned that the Bray Head Hotel, which is a Protected Structure at Number 899 is included in this Table for potential new housing units as the area of the site is stated to be 0.3 hectares so the area is small and could be needed for improving the hotel.

I have similar concerns about the inclusion of Oldcourt House, in this Table for potential new housing units as it is a Protected Structure at Number 863 as well as Brook House, which is also a Protected Structure at Number 824.

I object to the inclusion of Killruddery Demesne in this Table as it is rightly defined as an asset for Bray in Section 2.2.8 of this plan.

I also object to the inclusion of Powerscourt Demesne in Enniskerry in this Table as it too is a significant tourism asset for Bray Municipal District.

H

Pages 39 : Chapter 7 : Tourism : Insert the following new paragraph after the first paragraph to read as follows :

In the event of people erecting unauthorised developments without the benefit of planning permission or of erecting structures not in compliance with their planning permission there will be a presumption that Wicklow County Council will not grant retention permissions except in exceptional circumstances and will insist on the removal of the offending structures due to the importance of the listed assets in this chapter for tourism and recreation which are so important economically to Bray.

T

Page 52 : I welcome the content of policy AH5 re Powerscourt Estate and Killruddery demesne.

Pages 60-61 : The content of the first bullet point wherein the Killruddery Demesne Conservation and Tourism Zone is defined is welcome.

I would suggest that SLO1 re Killruddery be changed to Area Action Plan 4 for Killruddery. The reason being that that this is probably the last part of Killruddery that can be developed for housing so it is vital that it is got right. The development area

Re : Submission re Draft Bray Municipal District Local Area Plan 2017 continued :

envisaged at 12 hectares is one of the largest and thus an Action Area Plan for these lands would be more appropriate.

Vehicular access and egress should not be through the existing Killruddery entrance from the Southern Cross Road. At present there is a car park and a reserve car park on the western side of Killruddery demesne, neither of which are formally laid out. There is a narrow single lane unpaved dirt track which enables drivers to leave the estate via the existing gate.
It would be best if traffic from the new estate linked in to an existing estate access from the Southern Cross Road so that departing traffic does not get mixed up with traffic leaving events at the estate as otherwise the estate traffic is likely to become delayed and if this should happen the reputational damage to the estate could become severe and deter visitors going to the estate which would undermine the asset.

Page 65 : SL05 Bray Gateway and Transportation Hub(Gth Zone) :
Insert an additional paragraph at the end of the existing text to read as follows :

Wicklow County Council will preserve the Carlisle Grounds for active sporting purposes. Should Bray Wanderers decide to terminate its lease here, Wicklow County Council will seek to offer the Carlisle Grounds to another sporting organisation or organisations so as to retain the Carlisle Grounds in active sporting use.

Addition to List of Protected Structures :

86 Main Street, Bray-birthplace of Cearbhaill O'Dalaigh, fifth President of Ireland.

Modification to List of Protected Structures :

03-06 St. Patrick's Church of Ireland, Enniskerry : Add Interior to listing.

Yours Sincerely,

John Corcoran.

C68

Leonora Earls

From: Maria Lombard
Sent: 15 September 2017 13:29
To: Planning - Plan Review
Subject: BRAY MD LAP
Attachments: Sub on Draft Bray MD LAP - 15.09.17 - CPG.pdf

Dear Sir / Madam,

RPS is instructed by Cosgrave Property Group, 15 Hogan Place, Dublin 2 to lodge the attached submission in respect of the Draft Bray MD LAP 2017 on its behalf.

Regards,

Maria Lombard

Maria Lombard
Director, Planning and Environment - RPS
Innishmore,
Ballincollig, Co Cork.
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RPS

Draft Bray Municipal District Local Area Plan 2017-2023

Submission on Content of Draft LAP

September 2017

rpsgroup.com/ireland

RPS

Draft Bray Municipal District Local Area Plan 2017 - 2023

Submission on Content of Draft LAP

Document Control Sheet

Client:	Cosgrave Property Group
Project Title:	Draft Bray Municipal District Local Area Plan 2017 - 2023
Document Title:	Submission on Content of Draft LAP
Document No:	CP16046Rp0002

Text Pages:	12	Appendices:	-

Rev.	Status	Date	Author(s)		Reviewed By		Approved By	
F01	Final	15th September 2017	ML		SO'M		ML	

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1 INTRODUCTION

RPS is instructed by Cosgrave Property Group to lodge this submission in respect of the Draft Bray Municipal District Local Area Plan 2017 – 2023 (Bray MD LAP).

Cosgrave Property Group is the owner of significant lands within the Fassaroe area which falls within the Bray Municipal District area. A planning application for a first phase of development within these lands was recently the subject of a decision to grant permission by Wicklow County Council (Reg. Ref. 16/999). This decision is currently on appeal to An Bord Pleanála.

Overall, CPG is supportive of the overall strategy and approach to development within the Bray Municipal District in general and Fassaroe specifically as proposed within the draft LAP. There are a number of matters of detail within the Draft LAP however which are inconsistent with the nature and extent of the Phase 1 development which has already been the subject of a decision to grant permission by Wicklow County Council. We present a number of suggested modifications to the Draft LAP which will ensure consistency with the Phase 1 application development which also will allow for the future logical delivery of development on the remainder of the lands. The modifications are numbered for clarity.

2 NEIGHBOURHOOD CENTRE / VILLAGE CENTRE ZONING AT FASSAROE

2.1 CLARIFICATION OF ZONING NAMING

Map No. 2 of the Draft LAP (the Land Use Zoning Map) identifies land zoned for the purposes of *'NC Neighbourhood Centre'*. There are also other NC zoned areas and *'TC: Town Centre'* zoned areas within the overall Bray MD lands shown on Map No. 2. There are no lands identified as being zoned *'VC: Village Centre'*.

The zoning table in Chapter 11 of the Draft LAP however includes objectives for *'TC: Town Centre'* and *'VC: Village Centre'*, but does not include an objective for *NC: Neighbourhood Centre*. It is noted also that the lands at Fassaroe are referred to as *'VC'* in the Concept Plan at Chapter 10 of the Draft LAP.

Proposed Modification No. 1

It is requested therefore that the zoning objectives and naming as used on Map No. 2, the zoning table in Chapter 11, and the Concept Plan be properly co-ordinated and clarified.

2.2 EXTENT OF NC / VC ZONING IN EXCESS OF PRIMARY OBJECTIVE

The Draft LAP identifies approximately 6 hectares as Neighbourhood Centre / Village Centre within Fassaroe. Within this overall 6 hectares, the Draft LAP proposes the provision of a Level 4 Neighbourhood Centre; 75 No. residential units on 1 hectare; as well as a multi school campus.

We note that the primary purpose of a Town, Neighbourhood or Village Centre as outlined in the Land Use Zoning table of Chapter 11 of the Draft LAP is to provide for the development and improvement of the core town / neighbourhood centre uses include retail, commercial, office and civic uses as well as living over the shop or other ancillary residential uses. We further note that under the 'typical appropriate use' listings in Chapter 11 (page 72) of the Draft LAP, education use is not a generally appropriate use in town or village centres. Education use is provided for as generally appropriate within 'residential' or 'community and educational'. On Zoning Map 2, the 'CE: Community & Education' zoning objective appears to be used for sites of existing community and education uses. It seems in general then that the Planning Authority acknowledges that new school facilities are most appropriately and indeed most likely to be provided within residential zoned lands.

We note that the decision and responsibility for the delivery of a school will rest not with future Developers but with the Department of Education and Skills (DES). It is the responsibility of the DES to plan for the timely delivery of schools in line with the delivery of housing. The DES will identify at the appropriate time its preferred school location based on local circumstances at the time. It is possible based on various site suitability criteria that the DES will identify lands not included within the proposed NC /VC zoning at Fassaroe.

Based on the foregoing it is submitted that the extent of land currently identified for Neighbourhood Centre / Village Centre at Bray is well in excess of the primary objective to provide for Level 4 retail

and commercial uses along with ancillary residential. Furthermore, the western half of the proposed NC/VC zoning is already subject of a decision to grant housing under the current Phase 1 application Reg. Ref. 16/999. This should therefore be excluded from the proposed NC /VC zoning area.

It is also unlikely that a school campus could also be accommodated within the residual area between the neighbourhood centre and the residential area proposed in the current application. It is therefore more appropriate and practical that the LAP will make provision for the identification of a school site by DES on residential zoned land in the vicinity of the neighbourhood centre.

The provision within the lands for 75 No. dwelling units as provided for in Table 3.1 would represent an underutilisation of the residual land in this area. It is suggested that these concerns be addressed by the following modifications to the Draft LAP.

Proposed Modification No. 2

It is requested that Wicklow County Council restricts the extent of NC/VC zoned land to the eastern half of the NC/VC lands as currently proposed and zone the remainder (the western portion) R-HD - New Residential – High Density to reflect the content of the Phase 1 development already subject of a decision to grant permission by Wicklow County Council (see **Figure 2.1** below);

It is important to note that while this proposal would result in an increase in residential zoned land within the overall Fassaroe lands (from that proposed in the Draft LAP), it would have no nett effect on the overall quantum of land available for housing, as it would still be necessary to provide for a school campus site elsewhere within the overall residential zoned land.

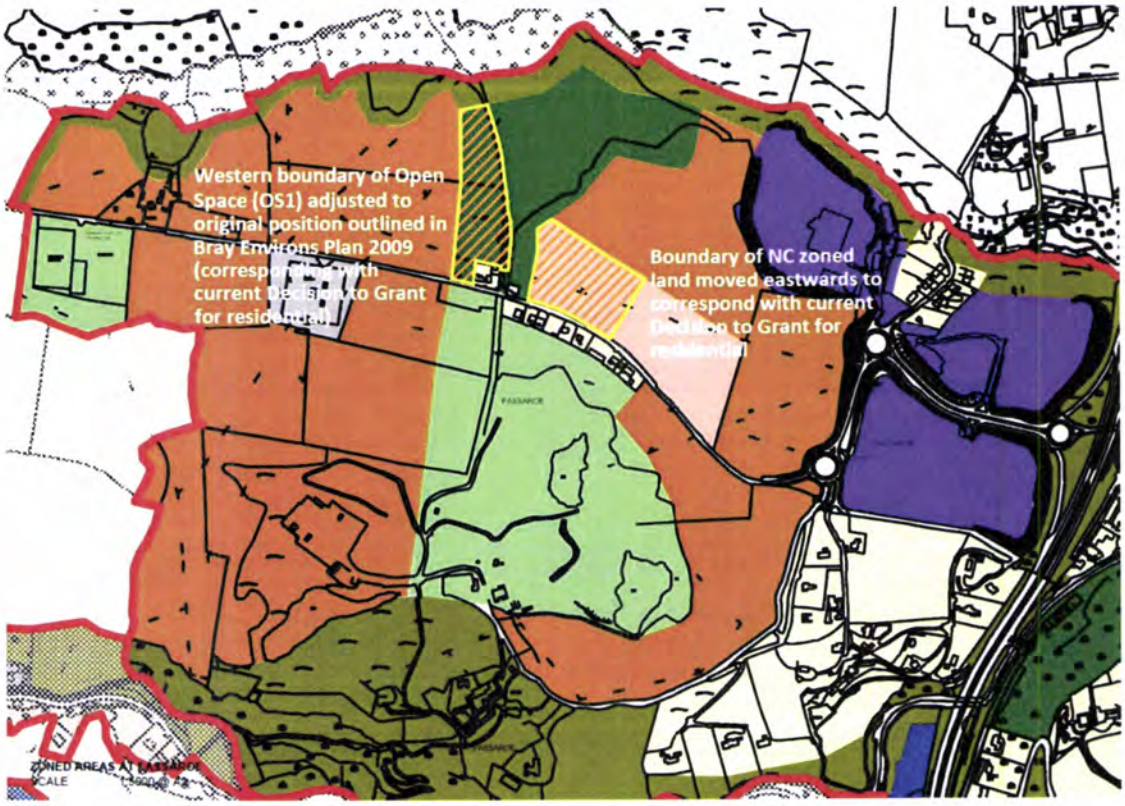
Proposed Modification No. 3

Omit the reference to in Table 3.1 of the Draft LAP to 75 No dwellings only being provided within the NC/VC zone

Proposed Modification No. 4

Revise Item 7 of the Fassaroe Concept Plan at Chapter 10 to provide that lands should be reserved for the future development of school accommodation in the vicinity of the village centre on R-HD lands; the location and scale of which to be agreed with the Department of Education and Skills.

Figure 2-1: Extract from Draft Bray Municipal District LAP 2017 Land Use Zoning Map showing area of possible Zoning Modifications



3 PHASING FOR DEVELOPMENT AT ACTION AREA 1: FASSAROE

The Phasing suggested in the Draft Plan is based on two general phases. Phase 1 is identified as generally to the east of the major open space and including the village centre and the reservation of a school site to be agreed with the DES; and the three easterly blocks of new residential development. Phase 2 is generally to the west of the major open space which should only be commenced when the delivery of 20 ha of major open space is well underway.

We request that this suggested Phasing approach be altered. As currently provided it would be inconsistent with the nature and extent of development already subject of a decision to grant permission by Wicklow County Council under Reg. Ref. 16/999. In general it would also likely result in practical impediments to the timely and orderly delivery of development at that overall Fassaroe lands. An alternative sequential approach focussed on the new neighbourhood centre to be provided at Fassaroe would be a more appropriate general phasing approach to be adopted than sequentially from the M11 which appears to be the basis of the Draft LAP phasing proposals.

3.1 PRACTICAL IMPLEMENTATION ISSUES WITH PHASING AS PROPOSED

As noted above, the overall development lands are currently the subject of a planning application which includes for a central neighbourhood centre, a distributor road connecting through to the N11, development at the employment lands to the east, residential development on lands on the western extent of the VC lands as now proposed, and residential lands to the west of the OS1 lands. This particular distribution, nature and extent of development presented within that application was partially in response to the provisions of the 2010 Masterplan for Fassaroe but also in response to practical implementation matters arising at the subject lands.

In the first instance it is noted that both the 2009 Bray Environs Local Area Plan as well as the current Draft Bray MD LAP require the provision of a link road through the area from Bray to Enniskerry. To provide for any new development at Fassaroe it is necessary to provide this full link road through to Ballyman Road. This link road serves the neighbourhood centre and runs primarily through residential lands in the northern portion of the overall Fassaroe lands. It crosses the area of major open space. It is reasonable and logical that development be permitted sequentially from the neighbourhood centre, OS1 lands and the alignment of the link road.

This is the order of development provided for in the recent decision to grant permission Reg. Ref. 16/999 by Wicklow County Council and which should now also logically be provided for in the new Bray MD LAP.

It is also noted that future development of the lands to the north of the village centre will be affected by the proposed north-south link route from the new distributor road to cross the Ballyman Glen and to link up with Old Conna Avenue. The nature and function of this route, as recorded at item 3 of the Concept Plan in the Draft LAP is currently undetermined. It is assumed that such details may be clarified in theproposed Local Transport Plan for Bray & Environs, which is still in the process of being prepared by the NTA. However this is not assured and indeed the timing of completion of this Plan is not defined or determined. Accordingly, there are potential practical impediments to bringing forward development proposals on the north-west residential quadrant in the immediate term. In this regard, while parts of the residential block to the north of the village centre may be possible to develop in a first phase, it is possible that there could be design difficulties

attached to fully developing this area in the short term pending confirmation of the nature of the North-South link.

In practical terms, phasing of development will also be influenced by landowners. CPG is in ownership of the full extent of the proposed link road to Ballyman Road. As full delivery of this infrastructural element is required to facilitate any development at the site, it is necessary that delivery of substantive development within CPG lands can also be delivered alongside and within the same phase as this road, as already acknowledged by Wicklow County Council in the decision to grant permission under Reg. Ref. 16/999.

Having regard to all of the foregoing then in practical terms the northwest quadrant of residential zoning becomes a necessary and practical element of first phase development. The Neighbourhood Centre (or part thereof) and OS1 become practical and appropriate elements of Phase 1 also.

3.2 PRINCIPLE OF SEQUENTIAL APPROACH

From the content of the Draft Bray MD LAP, the rationale for the particular phasing approach suggested is not clear. Given that it proposes development to the east firstly followed by development to the west thereafter, it is assumed that it may be based on proximity to Bray town. In this regard we note that Wicklow County Council in general support the phasing of development in accordance with the sequential approach. This is confirmed at P73 of the Draft LAP.

We note and support the general principle of sequential development. In the case of the major new development at Fassaroe this sequential approach should be based on the core community and infrastructural elements of development that will be provided as part of the initial development of the site, and as provided for in the current phase 1 development proposal under Reg. Ref. 16/999. This includes as set out above a neighbourhood centre, a major open space area and a link road through to the N11. The overall lands at Fassaroe while forming a new growth centre for Bray, will also in themselves form a new major development zoned focus on a central neighbourhood centre and district open space.

3.3 PROPOSED REVISED PHASING PROVISION

We request that the phasing proposals in the Draft LAP be revised to provide for a more site appropriate sequential approach based on these principles and on the extent of development already subject of a decision to grant permission. On the basis of the foregoing and also have regard to key elements of the phasing approach identified by the Planning Authority in the Draft LAP we accordingly request that Item 1 of the Concept Plan for Fassaroe which relates to phasing be altered.

Proposed Modification No. 5

Item 1 of the Concept Plan should be modified as follows:

> *Development shall be carried out in phases in the following general manner. It is possible that there will be overlap between Phase 1 and Phase 2 and between Phase 2 and Phase 3.*

Phase 1 *Distributor Road, Village Centre, Adjacent Northwest and Northeast Residential Blocks, Northern Open Space*

This will include the provision of the main east west link road; the 'village centre'; residential development adjacent to the spine road including the northwest residential block and the northeast residential block (or part thereof) shown in concept plan above. The northwest residential quadrant will only be developed in tandem with the delivery of the northern portion of the major open space and with the delivery of residential and village centre development to the east of the OS.

Phase 1 will include development on employment areas adjacent to distributor road.

Phase 2 *Southeastern Residential Blocks*

This phase will see the completion of the northeastern residential block (pending agreement on the nature and route of north-south link) and the delivery of the two southeasterly residential blocks. It will include at a minimum the reservation of a site for a school campus. The timing of delivery of the school will be determined by the Department of Education and Skills, but expected to be delivered within this phase. This phase will also include agreement on the design of the southern portion of the major open space.

Further employment development.

Phase 3 *Southern Open Space and Southwestern Residential Block*

No residential development may commence in the southeaster block until the delivery programme of the southern portion of the major open space is well underway and will be completed by the time housing units are ready for occupation.

Completion of employment development.

4 ZONING OBJECTIVES AND PROPOSED BOUNDARIES

4.1 MAJOR OPEN SPACE ZONING OBJECTIVE BOUNDARIES

It is noted that the boundary of the proposed OS1 open space area illustrated on the Land Use Zoning Map of the Draft LAP extends into an area of residential development already subject of a decision to grant permission by Wicklow County Council which was in line with the zoning boundary provided for under the Bray Environs LAP 2009. While we acknowledge that these boundaries are not prescriptive, we respectfully suggest in the interest of consistency with the scheme approved by the Wicklow County Council Decision to Grant that the western boundary of OS1 land reverts to it's original location illustrated in the Bray Environs LAP 2009

Proposed Modification No. 6

We therefore request that the new Bray MD LAP maintain the existing western boundary line for the major open space area in the northern part of the lands. **Figure 2.1** above identifies the suggested adjustment to the boundary between OS1 and R-HD zoning referred to above.

We note that the Concept Plan at Chapter 10 of the Draft LAP provides guidelines for open space provision at the Fassaroe lands and requires that the overall provision for major open space (including OS1 and AOS) shall be 20 ha. It is submitted that the extent of OS1 and AOS illustrated on the Land Use Zoning Map of the Draft LAP is well in excess of 20 hectares. (we have measured this at approx. 30 hectares as illustrated). The proposed boundary revision then could easily be accommodated while also maintaining the objective to provide a total of 20 ha of open space at both the OS1 and AOS lands combined.

4.2 E – EMPLOYMENT ZONED LANDS – TYPICALLY APPROPRIATE USES

Chapter 11 of the Draft LAP sets out proposed land use zoning objectives and sets out 'typical appropriate use' provisions for variously zoned lands. We note the 'typical appropriate use' provisions for 'E:Employment' zoned lands at Page 72 of the Draft LAP. While we recognise that the uses listed are typically appropriate in employment zones, in the case of Fassaroe it is submitted that consideration should also be given to including hotel uses within the general appropriate provisions. Given the overall layout and context of the development lands at Fassaroe it is considered that the provision of a hotel within the E-Employment zoned lands could potentially deliver a high quality gateway feature development for the overall lands. In terms of its overall setting within the wider context of Bray this would also be a suitable location.

Proposed Modification No. 7

It is proposed that the provisions at Page 72 of the Draft LAP for generally appropriate uses for 'employment' zoned lands be amended with the provision of a sentence as follows:

> *"In the case of employment zoned land at Fassaroe, consideration will also be given to accommodating hotel use".*

5 DEVELOPMENT STANDARDS

We note in the Introduction section of the Draft LAP that it is proposed that development standards set out in the County Development Plan shall apply to development within the Bray Municipal District unless otherwise specifically provided for within the LAP.

As a major new growth centre for Bray and indeed for the Greater Dublin Area, it is respectfully submitted that some of the general development standards set out in the County Development Plan may not be appropriate for the subject lands. The lands at Fassaroe will be a high density development typical of high densities within other major development areas in the Greater Dublin Area including Dun Laoghaire Rathdown, Dublin City, South Dublin, Fingal, Meath and Kildare. In this regard development at Fassaroe will be more comparable with development in parts of Dun Laoghaire Rathdown County for instance than say southern parts of County Wicklow. On this basis it is submitted that some development standards that may be appropriate elsewhere in the County may not be suitable for development at Fassaroe.

In particular we note the private open space provisions of the Wicklow County Development Plan are potentially significantly in excess of requirements of other planning authorities for major growth centres in the GDA. The Development and Design Standards at Appendix 1 of the Plan, present the following private open space requirements.

> *Dwellings (including own door duplexes) shall generally be provided with private open space at the following minimum rates:*

House size	Minimum private open space
1-2 bedrooms	50sqm
3+ bedrooms	60-75sqm

> *As a general 'rule of thumb', 0.64sqm of private open space shall be provided for each 1sqm of house floor area, subject to the minimum sizes specified above.*

In the case of a proposal for a house size of 155sq.m. for example, this would result in average private open space requirement of 99sq.m. Clearly in a development of the scale of 3,700 dwellings approx. it will be necessary and appropriate to include some provision of such scaled houses and indeed possibly larger also.

Considering the general approach to density and private open space within the overall County Development Plan, it is acknowledged that these development plan provisions work well for the typical scenarios provided for in the development plan, which generally allow for lower density development and where higher density is identified it is generally houses of a small size. In this regard, we have reviewed various Town Plans and Local Area Plan throughout Wicklow, and in particular have reviewed typical and maximum densities identified for new development. Typical densities on strategic sites for new development in towns of Wicklow are generally 15 or 20 units per hectare, and occasionally rising to 22 units per hectare. On some town centre sites the maximum densities on occasion extend to 40 units per hectare. Within higher density designated

sites 40 – 50 units per hectare in town centre or edge of centre sites the various plans within the county envisage delivery of these units in the form of apartments or modestly sized housing of 100sq.m. approx.

Thus under the scenarios within the development plan in which higher density housing is envisaged (i.e. 100sq.m houses at 50 units/ha), the private open space requirement would be 64sq.m. If larger units and garden sizes were provided (e.g. 200 sq.m. houses with 128sq.m. gardens) on such higher density areas, the appropriate density provided for is typically 25 units/ hectares.

On lower density designated sites (15, 20 and 22 units / hectare) regularly found on strategic or action area sites under town plans / local area plans, it would be possible to provide more generously sized houses and also larger private open space.

The subject lands at Fassaroe however, it is submitted, present a very different overall planning context such that the standard private open space requirements, set out by Wicklow County Council under its various plans, is not appropriate or achievable on the Fassaroe lands. The density proposed for Fassaroe is 50 units / hectare. Such density is well in excess of the typical densities envisaged under the County Development Plan and various local plans within the county, even for town centre sites. On this basis alone, it is respectfully submitted that that standard private open space requirements envisaged for standard densities are not appropriate or indeed achievable within the context of the Fassaroe lands.

In addition the overall lands at Fassaroe provide for major public open space provision, well in excess of the standard rate of public open space provided for in smaller developments elsewhere in the county.

In terms of the specific planning context of the lands at Fassaroe we consider it relevant to consider typical garden sizes required by other planning authorities within the Greater Dublin Area which would contain similar new large scale new development centres at comparable densities. **Table 5.1** below presents the current minimum garden sizes required currently within a number of counties in the GDA.

Table 5-1: Current Minimum Garden Sizes for houses of 4 bedrooms or more

County	Private open Space Requirement 4 bed +
Fingal County	Minimum 75sq.m.
Dun Laoghaire Rathdown County Council	Minimum 75sq.m.
South Dublin	Minimum 70sq.m.
Kildare	Minimum 75sq.m.
Meath	Minimum 75sq.m.

Proposed Modifications No. 8(a) and 8(b)

On this basis we request that Wicklow County Council give consideration to specific development standards, and in particular private open space, which would be appropriate and applicable to Fassaroe.

We accordingly request that the sixth paragraph of Page 1 Introduction of the Draft LAP be modified to state as follows (proposed additions in bold, deletions shown as strike through):

> *"In particular, development standards, retail strategies, housing strategies etc. that are included in the County Development Plan shall not be repeated. Any* ***additional or alternative*** *specific policies/objectives or development standards required for this area,* ***or part thereof,*** *will be stated as precisely that, and ~~in all cases~~ will be consistent with the County Development Plan* ***as practicable. Any alternative provisions are specifically set out in the Action Area Concept Plan provisions at Chapter 11.*** *Thus development standards will therefore* ***generally*** *be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the plans and the general public alike"*

Hand in hand with this, we also request that an additional 'objective' be included in the Concept Plan provisions for Fassaroe at Chapter 11. We request the insertion of an objective No. 11 as follows:

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

6 CONCLUSION

In conclusion we wish to reiterate that CPG is very supportive of the content of the Draft Bray MD LAP as published. CPG has a keen understanding of specific site conditions at Fassaroe and of how these will impact on appropriate design and development responses at the site. Wicklow County Council has also recently issued a decision to grant permission for a substantial first phase of development at Fassaroe. It is therefore logical and reasonable that the proposed Bray MD LAP be consistent with this phase 1 development currently awaiting decision from An Bord Pleanála.

It is submitted that none of these proposed modifications presented in this submission alter the substance, vision or strategy for development at Fassaroe as set out in the Bray MD LAP. Rather they seek simply to ensure consistency with the recent decision to grant by Wicklow County Council and to provide for smooth, orderly and logical delivery of development at Fassaroe. These proposed modifications have regard to the proper planning and sustainable development of the area and also to the practical matters which will affect the implementation of development at Fassaroe bearing in mind that a single landowner is not in complete control of the entirety of the lands.

The modifications proposed are of modest extent, yet will assist significantly in the practical deliverability of the plan. We note that this is a particular desire of the Planning Authority as provided for in the Introduction of the LAP where it states that **"the role of the land use plan is to put in place framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies".**

We hope that Wicklow County Council will see the benefits of accommodating these proposed modifications which will greatly assist both the planning authority and CPG in the delivery of orderly development at Fassaroe in the coming years.

C69

Leonora Earls

From: Patrick Costello [p 1]
Sent: 12 September 2017 21:47
To: Planning - Plan Review
Cc: Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Pat Kennedy
Subject: Kilruddery Rezoning of Land Objection

To whom it may concern,

On behalf of the Costello family, I would like to strongly object to the proposed rezoning of land and building of houses in the Kilruddery estate for the following reasons:

Traffic Chaos

As I'm sure most of you know the traffic on and around the southern cross road is already extremely heavy. An extra 240 houses would go further to compounding this problem.

Flooding

Much of Hollybrook Park estate is already built on a flood plain and more houses, especially at the foot of the small Sugarloaf could cause major flooding.

Access & Exits

The current access and exit structure couldn't support another 240 houses and some of the access suggestions would mean major distribution to many estates and residents.

Destruction of Tourist Attraction & Amenities

We all know and love Kilruddery house and gardens. The grounds offer many great local amenities for the people of Bray and the surrounding areas. A development of this scale will affect not only the grounds of Kilruddery but it will also deter people from visiting Bray as this is one of the main attractions.

Kind regards,

Mr & Mrs. Costello, 31 Swanbrook, Southern Cross Road, Bray, Co.Wicklow

C70

Leonora Earls

From: Jonathan Costello e]
Sent: 15 September 2017 16:05
To: Planning - Plan Review
Cc: Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC
Subject: Re: Rezoning of lands on the slopes of the Little Sugar Loaf/Southern Cross Road, Bray

To whom it may concern,

I'm sending this email in regards to the proposed rezoning of land (incl the development of 240 new houses) on the slopes of the Little Sugar Loaf/Southern Cross Road, Bray.

I and many of my neighbours are opposed to this development due to some of the following reasons;

1. Increase in traffic - currently the Southern Cross Road and surrounding roads have huge traffic congestion problems. Allowing more houses to be built in any of the surrounding areas before the correct infrastructure is put in place is simply crazy and irresponsible.
2. The slopes of the Little Sugar Loaf/Killruddery Estate is a beautiful part of Wicklow and is by many people as a recreational area. Allowing any further development in this area is again irresponsible.

I appreciate the need for more houses around the country, but this location that is being discussed is most definitely not the correct location.

Kind regards,

ɔnathan Costello
57 Deepdales,
Southern Cross Road,
Bray,
Co.Wicklow

Bernadette Harvey

From:	Jonathan Costello [ie]
Sent:	15 September 2017 16:05
To:	Planning - Plan Review
Cc:	Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; Cllr. Thomas Cullen MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC
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1. Increase in traffic - currently the Southern Cross Road and surrounding roads have huge traffic congestion problems. Allowing more houses to be built in any of the surrounding areas before the correct infrastructure is put in place is simply crazy and irresponsible.
2. The slopes of the Little Sugar Loaf/Killruddery Estate is a beautiful part of Wicklow and is by many people as a recreational area. Allowing any further development in this area is again irresponsible.

I appreciate the need for more houses around the country, but this location that is being discussed is most definitely not the correct location.

Kind regards,

onathan Costello
57 Deepdales,
Southern Cross Road,
Bray,
Co.Wicklow

9/9/17.

C71

Ref : BRAY MD LAP 2017

- Objection to rezoning of land, adjacent to Oldcourt House, as R20 'New Residential' at rear of Giltspur Wood, BRAY.

Contact details

Suzanne Creevey
92 Giltspur Wood
Bray
Co. Wicklow

①

Suzanne Creevey,
92 Giltspur Wood,
Bray,
Co. Wicklow.
9/9/17

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

Ref: BRAY MD LAP 2017.

Dear Administrative Officer,

I am writing to make a submission in objection to the rezoning of land, adjacent to Oldcourt House, as R20 'New Residential', at the rear of Giltspur Wood, Bray.

It has been brought to my attention that if the land is rezoned the access will be decided at the time of a planning application, however it is highly likely that the access will be through the

Cul de sac of 4 houses in Oldtown Wood (nos. 91-94). I live in no. 92 and obviously this would have huge ramifications for me and my 7 year old daughter, but also for the residents of the whole estate.

I have lived in no. 92 for 15 years & my daughter has grown up in this safe neighbourhood, but this safety would be removed if this rezoning goes ahead. While I understand that there is a need for more housing in Bray, I think the planners would be putting the safety of the children that already live in the 95 houses in this estate at risk, just to build 10 houses.

My main concerns are the safety of the children, the road safety & the traffic safety. The children in the estate live in a safe environment and it is possible to allow the younger children to have

freedom to play on the large green area in front of the houses (no. 91-94). This freedom & safety would be removed if the rezoning went ahead and the wall of the cul de sac in front of these houses was knocked down to provide access for the new houses.

You also have to bear in mind the safety of the children during the construction of the new houses, when there would obviously be construction vehicles using the narrow roads of our estate. There was prior building in another cul de sac in our estate in 2001/02 and there were a number of serious injuries sustained during the construction phase. We do not want a repitition of this.

Traffic congestion is also a major concern. Recent changes to the direction of traffic in the area, Soldiers Road, coupled with the neighbouring new development,

Castlelyon have dramatically reversed the traffic on the road and the road usage in the vicinity. A new development in the area would exacerbate this further.

There are also 4 protected monuments adjacent to the land. Building residential houses so near to the monuments would risk their preservation. They are:

- W1008-002001 - Fortified House/Castle → 600 yrs old
- W1008-002002 - the bawn associated with the house
- W1008-003 - a high cross
- W1008-041 Old Court House - 17th century

Flooding is also an issue. The OPW Fluvial Flooding map tool outlines that the Oldcourt River & surrounding land, including the proposed rezoned field, is included within the 1 in 100 year flood zone & is therefore a flood risk.

....

There is also a tree preservation order which covers all the trees on the proposed rezoned site & all the land surrounding the site, Order no. 5, Old Court House & Vavay House, Swan River Valley.

It is also important to bear in mind there would be an additional loss of recreational green space within our existing estate to facilitate traffic to new ranges.

I would ask that you consider my submission & the objections I have raised in the hope of preventing the rezoning of the land we have outlined.

Yours sincerely,

Suzanne Geevey

C72

Leonora Earls

From: Aoife Byrne [
Sent: 15 September 2017 16:02
To: Planning - Plan Review
Subject: RE: Draft Bray Municipal District Local Area Plan 2017 - 2023
Attachments: 170616 501.00267.00010.04 R. Draft Bray LAP Submission.Rev4FINAL.pdf

Dear Sir/Madam

I have subsequently been advised that your system can take files of up to 15MB. For your convenience, I attached the submission as a single document.

Regards,

Aoife

SLR

Aoife Byrne
Senior Planner - Planning

+353 1 296 4667
abyrne@slrconsulting.com

SLR Consulting Ireland
7 Dundrum Business Park, Windy Arbour, Dublin, D14 N2Y7

From: Aoife Byrne
Sent: 15 September 2017 15:54
To: 'planreview@wicklowcoco.ie'
Subject: RE: Draft Bray Municipal District Local Area Plan 2017 - 2023

Dear Sir/Madam

Please find the fourth and final part attached.

Regards,

Aoife

From: Aoife Byrne
Sent: 15 September 2017 15:54
To: 'planreview@wicklowcoco.ie'
Subject: RE: Draft Bray Municipal District Local Area Plan 2017 - 2023

Dear Sir/Madam

Please find Part 3 attached.

Regards,

Aoife

From: Aoife Byrne
Sent: 15 September 2017 15:53
To: 'planreview@wicklowcoco.ie'
Subject: RE: Draft Bray Municipal District Local Area Plan 2017 - 2023

Dear Sir/Madam

Please find Part 2 attached.

Regards,

Aoife

From: Aoife Byrne
Sent: 15 September 2017 15:53
To: 'planreview@wicklowcoco.ie'
Subject: Draft Bray Municipal District Local Area Plan 2017 - 2023

Dear Sir/Madam,

Please find attached a submission regarding the Draft Bray Municipal District Local Area Plan 2017 – 2023 on behalf of CRH Estates Limited. Due to the file size and as advised by the Planning Department, I will be sending this document in four parts.

Regards,

Aoife

BRAY MUNICIPAL DISTRICT DRAFT LAP 2017

Submission prepared for CRH Estates Limited

SLR Ref: 501.00267.00010/04
Version No: Rev4
September 2017

SLR

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CONTENTS

DOCUMENT REFERENCES

TABLES

FIGURES

1.0 BACKGROUND AND PURPOSE

1.1 Introduction

Wicklow County Council has published the Bray Municipal District Draft Local Area Plan for the period 2017 to 2023. The consultation period closes on 15th September 2017.

Roadstone Limited and CRH Estates Limited (both part of the CRH Group) have property assets within the Bray Municipal District at Fassaroe. The Roadstone/CRHE lands at Fassaroe are zoned under the Bray Environs Local Area Plan (LAP) 2009 – 2017 and are the subject of the Fassaroe Masterplan 2010. As key stakeholder, CRH Estates Limited (CRHE) intends to be fully involved in any review of LAP policies that would affect the development of Fassaroe.

This submission sets out CRHE's proposed strategy for the Fassaroe area for inclusion by Wicklow County Council in the upcoming local area plan (LAP). This report outlines the preferred approach for the development of these lands.

This submission has been prepared by SLR Consulting Ireland and Loci. The updated concept plans included in this submission have been prepared by Loci, who are urban design and masterplanning consultants to CRHE.

1.2 Overview of Proposed Development Strategy

In proposing a revised development strategy for CRHE lands in Fassaroe, this report outlines the following revisions to the Bray Municipal District Draft Local Area Plan 2017-2023 (draft LAP):

- an updated concept plan;
- a revised zoning plan, providing for reduced open space, a supplementary schools site, a southern frontage to the village centre and additional residential zoned land;
- a more detailed proposal in relation to density;
- an urban structure plan;
- a more detailed phasing plan;
- greater information in relation to the provision of mass transit;
- more detailed proposals in relation to the delivery of schools.

2.0 KEY ISSUES

2.1 Proposals for Fassaroe

As a key stakeholder, CRH Estates Limited (CRHE) welcomes the opportunity to review and comment on the draft LAP. Although CRHE considers many of the proposed revisions to existing strategy to be beneficial, it is considered the draft LAP would benefit from the inclusion of additional detail regarding the concept plan, density, zoning, the provision of educational facilities, urban structure, the provision of a crossing at the Ballyman Glen and the reservation of land for public transport infrastructure. This additional detail would provide a firmer foundation for the development of an Action Area Plan by the key stakeholders and would provide greater certainty to local communities.

CRHE proposes a number of preferred options in relation to these items in Section 3 of this document.

2.2 Balance of Built Development and Open Space

Map No. 2 of the draft LAP indicates that a large area of open space is to be provided within the CRHE/Roadstone landholding. The draft LAP states that open space is proposed on land restored by inert soil recovery and aggregate extraction areas.

It is considered that the provision of open space should not be based on the former land uses at the CRHE/Roadstone lands, but on the need to provide a suitable, well-designed and functional open space that provides for the recreational needs for future residents. It should also be noted that the aggregate workings within the Roadstone/CRHE landholding have been the subject of restoration by inert soil recovery under an Environmental Protection Agency licence and do not pose an environmental or health risk.

In order to provide an appropriate active open space (AOS) within the CRHE/Roadstone landholding; a smaller local open space within the residential area; and an appropriate balance of built development and open space, a revised zoning plan is included in section 3.

2.3 Urban Structure, Density and Phasing

The draft LAP does not provide detail regarding urban structure, density of residential development and phasing. In order to facilitate the preparation of an Action Area plan, CRHE has included preferred options in relation to these matters in Section 3 of this document.

2.4 Provision of Luas and Ballyman Glen Bridge

Notwithstanding that the Greater Dublin Area Transport Strategy 2016-2035 no longer provides for the extension of Luas to Fassaroe, the draft LAP requires that land is reserved for Luas stabling and that a bridge is required across the Ballyman Glen. It is noted, however, that the draft LAP does not specify the location of the bridge, the alignment of the Luas tracks or the location of the stabling.

In order for a comprehensive and integrated development strategy and urban structure to be designed for Fassaroe, it is necessary to specify the location of these key pieces of infrastructure. In order to address this matter, a concept movement plan is provided in Section 3. It is also necessary to consider the provision of alternative forms of mass transit, in order to facilitate the development of the Fassaroe area should the development of the Luas not be forthcoming.

The Dun Laoghaire Rathdown County Development Plan 2016 – 2022 indicates that the delivery of the Ballyman Glen Bridge is the responsibility of the NTA, Dun Laoghaire Rathdown County Council and Wicklow County Council. This should be clarified in the final iteration of the Bray Municipal District Local Area Plan.

2.5 Provision of Schools and Village Centre

The draft LAP notes that a multi school campus is to be provided within the village centre zoning. The number, types and size of schools are not specified. It is further stated that additional schools may be provided to the west of the open space within the residential zoning, if required.

In order to provide greater certainty to developers and to facilitate the preparation of an integrated Action Area Plan, it is considered that the location and likely number of schools should be specified. In order to facilitate this, a draft concept plan that identifies the location of schools and a zoning plan are provided below. It is also proposed that any additional school would be provided for within the Active Open Space. A primary school would benefit from access to the facilities within the Active Open Space and the proposed location would facilitate the delivery of vital infrastructure and facilities at an early stage.

The proposed village centre is located entirely within the Cosgrave Property Group landholding. This renders the delivery of housing to the south of Berryfield Lane dependent on the progression of the CPG development. It is considered that an area of village centre zoning should be provided to the south of Berryfield Lane, to facilitate the development of housing to the south of Berryfield Lane and to ensure that that village centre has a southern frontage. This will also ensure continuity with the Fassaroe Masterplan (2010) and the recently permitted Cosgrave Property Group proposal to the north of Berryfield Lane (ref. 16999) and would ensure the quality of the urban design outcomes.

3.0 PROPOSED REVISIONS TO DRAFT LAP

Although CRHE welcomes many of the proposed revisions to the existing development strategy for Fassaroe, it considered that the draft LAP would benefit from additional detail regarding, *inter alia,* the urban structure, the location of educational facilities and the location of public infrastructure. Under this submission, CRHE proposes a number of revisions that would provide greater detail as part of the statutory plan process and that would provide greater certainty to developers and to the community. This will ensure that the Action Area Plan process can proceed within a clearer and more detailed framework for the development of Fassaroe.

3.1 Concept Plan

Chapter 10 of the draft LAP sets out a concept plan for the development of Action Area 1, which relates to Fassaroe. It is noted that this concept plan does not include a legend and does not relate directly to the zoning map (Map No. 2), because the area of open space shown on the zoning plan is larger than that shown on the concept plan.

This draft concept plan provides for residential development and open space on the CRHE landholding. It also provides for employment, village centre, residential and open space uses on the Cosgrave Property Group landholding. Although CRHE generally welcomes the draft concept plan, CRHE considers that greater clarity and additional detail within the draft LAP would provide greater certainty for both developers and communities and would provide a firmer basis for the development of an Area Action Plan.

The revised concept map as proposed by CRHE (Figure 1 below) provides for:

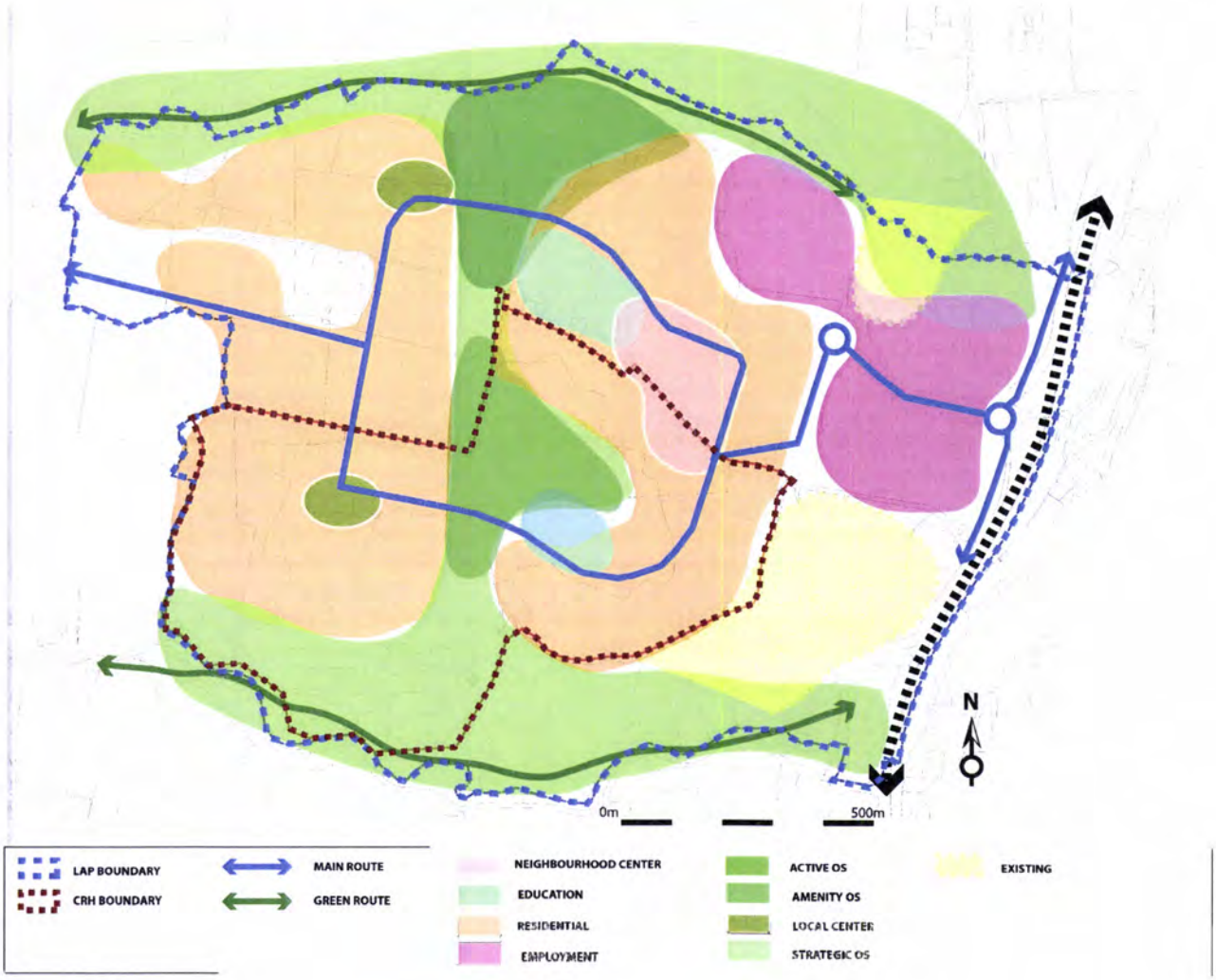
- the inclusion of a small area of village centre zoning to the south of the proposed link road;
- the identification of two locations for educational purposes;
- an increase in the residential zoning within the CRHE/Roadstone landholding;
- the redesign of the AOS Active Open Space zoning within the CRHE/Roadstone landholding;
- the redesign of the OS2 Open Space zoning to reflect the GB (greenbelt) zoning in the existing LAP;
- the provision of two local centres within the residential zoning.

The reshaping of the residential zoning:

- provides an adequate depth of urban fabric off the main avenue;
- produces a critical mass of community;
- provides appropriate wrapping and backing to existing low-density development fronting Berryfield Lane;
- provides appropriate frontage to the Active Open Space.

The Active Open Space is fronted by education and residential uses and provides for a range of recreational functions. The proposed school site within the CRHE/Roadstone landholding would provide a primary school to supplement the proposed educational campus to the north of Berryfield Lane, if required. The proposed primary school would benefit from facilities within the active open space. The revised concept plan also provides for small-scale local centres (comprising local shops and services only) to be provided within lands zoned for residential use in the western sector of the CRHE/Roadstone landholding. This would be provided alongside a multi-functional, local open space.

Figure 1
Revised Concept Plan



Source: Loci

3.2 Zoning

Although the draft LAP has reduced the area of employment land within the Fassaroe area, the land zoned for built development within the CRHE landholding has also been reduced. Under the existing LAP for the period 2009 – 2017, it is estimated that land zoned for built development within the CRHE/Roadstone landholding comprises c. 42ha and the area devoted to open space comprises c. 20ha. Under the draft LAP, the area of land zoned for built development is estimated to have been reduced has been reduced to c. 27.5ha and the area of open space, through the expansion of both the GB (greenbelt)/OS2 land and the OS (open space)/AOS (active open space) is now estimated as c. 35.1ha (refer to Table 3-1).

Table 3-1
Comparison of Estimated Existing and Draft LAP zoning with CRHE/Roadstone landholding

Land Use	Existing LAP (2009)	Draft LAP (2017)
	Area (ha)	Area (ha)
Residential[1]	14.5ha	27.5ha
Commercial[2]	8ha	0ha
Employment	19.5ha	0ha
Open Space	11ha	18ha
Education	0	0ha
Greenbelt	9ha	17.1
Total	c. 62ha	c. 62ha

It is considered that a high quantum of development with adequate densities and adequate open spaces is required to support the delivery of Luas or another form of mass transit. An increase in open space provision would undermine the objective of delivering Luas or mass transit. The plan must allow for a quantum of development that supports efficient use of LUAS or other public transport investment.

A large area of active open space (AOS) now sits in the centre of the Roadstone/CRHE lands. This zoning covers a more extensive area, and extends further north, east and west than the existing LAP OS zoning. In relation to the open space, the text on Action Area 1 states:

> *"The need for a significant new open space facility to serve both the future residents of the area and the wider area; significant parts of the area were formerly used for aggregate extraction and for land filling and such areas are considered optimal for such use."*

It should be noted that only part of the CRHE/Roadstone landholding has been the subject of aggregate extraction and subsequent restoration by inert soil recovery under an EPA waste licence. The restoration operations that have taken place within the Roadstone/CRHE landholding do not constrain built development, subject to appropriate engineering solutions. Restoration operations were undertaken using inert soil material; therefore, there are no environmental constraints related to the development of this land.

Roadstone is currently engaged in the process of surrendering part of the waste licence area. This process is overseen by the EPA (Environmental Protection Agency) and requires several years of monitoring data (much of which has already been gathered) to confirm whether Roadstone has complied with the requirements of the waste licence. It is considered that the lands within the waste licence area will be suitable for development and that there are no significant environmental constraints relate to the development of the land for housing or other built development.

The majority of open space provision within Action Area 1 is also required within the Roadstone/CRHE landholding. It is considered that the developable land within the CRHE/Roadstone landholding should be

[1] 15% of MU1 and 60% of MU2 under existing Bray Environs LAP
[2] 85% of MU1 AND 40% of MU2 in existing Bray Environs LAP

increased to ensure a more balanced provision of open space across the Action Area. As it stands, it is estimated that 40% of the zoned land in the draft LAP is zoned as OS1, OS2 or AOS, with approximately 56% of the CRHE/Roadstone landholding zoned as AOS or OS2.

Furthermore, it is not clear whether the typical standard of 15%[3] of local open space will be required within the areas zoned for high-density residential development. It should be noted that the relevant guidelines state

> *"In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community."*

It is considered that it would be extremely difficult to reach the stated housing targets for Fassaroe, if the requirement for 15% open space is applied in addition to the provision of land zoned AOS, OS1 and OS2 under the draft LAP. On this basis, it is assumed that the zoned open space provides for all of the required open space provision; however, this should be clearly stated in the draft LAP.

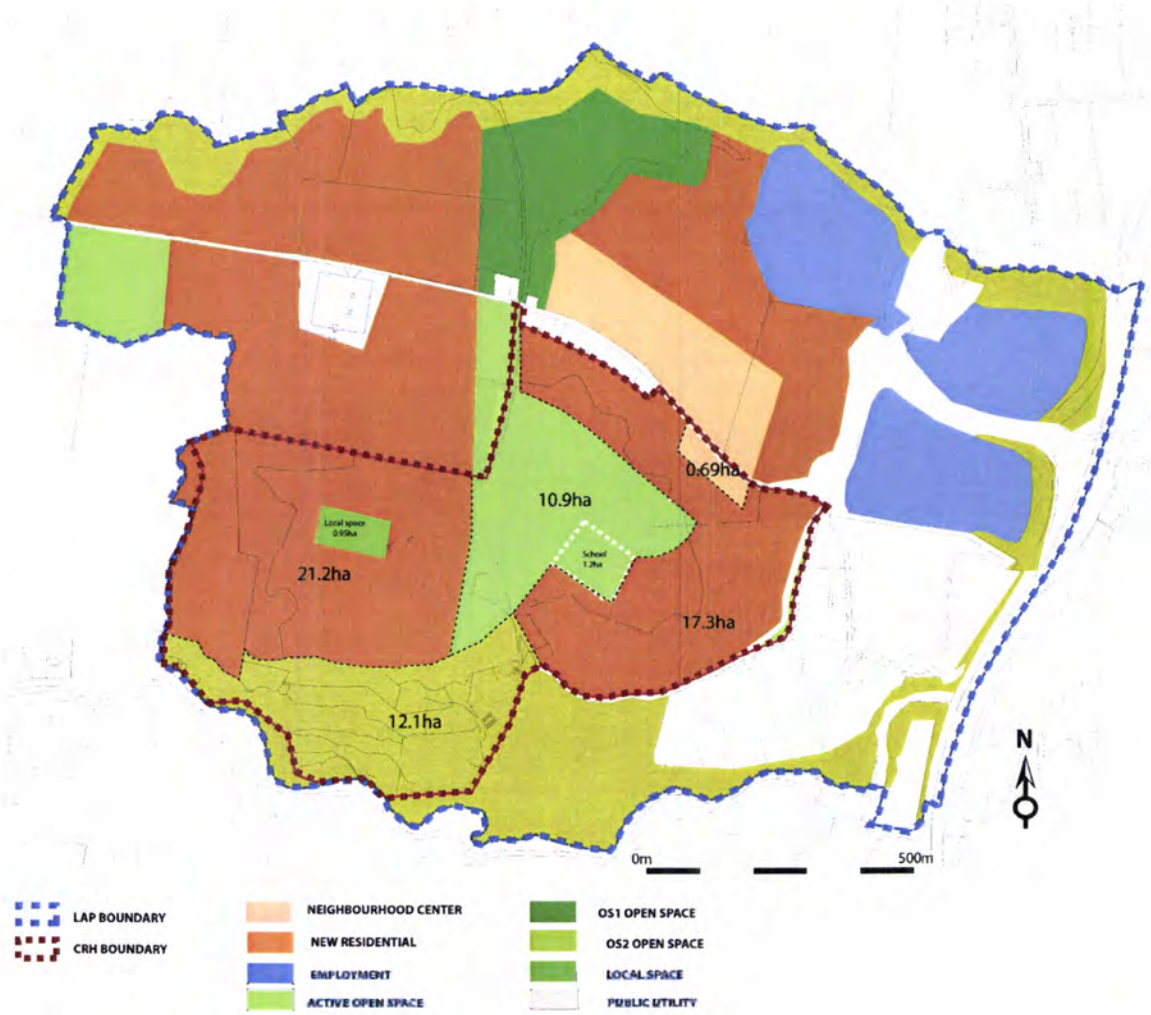
The active open space (AOS zoning), as proposed by the draft LAP, is extremely large and would benefit from being redesigned to create a more functional, multipurpose space that is wrapped by built development and benefits from a greater degree of passive supervision.

In addition, the area zoned as greenbelt in the existing LAP is now zoned as OS2 and has been expanded. The draft LAP notes that the objective of OS2 zoning is protect existing undeveloped, open lands that include flood plains and areas of natural biodiversity. It should be noted, however, that the increased OS2 zoning includes some areas that are within the waste licence area and do not comprise a natural or undeveloped environment. Under the existing LAP zoning, approximately 13% of the CRHE/Roadstone landholding is zoned GB Greenbelt and under the draft LAP zoning, approximately 27% of the CRHE/Roadstone landholding is zoned the equivalent OS2 Open Space.

A revised zoning map is proposed (refer to Figure 2). This provides for a more functional and usable area of active open space; ensures that a southern frontage is provided to the neighbourhood centre; provides an appropriate balance of built development and open space; provides local open space; and permits the early delivery of a school site within the CRHE/Roadstone landholding, if required.

[3] Section 4.19 of Department of Environment, Heritage and Local Government (2008). *Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities*

Figure 2
Revised Zoning Map



Source: Loci

A comparison of the quantum of development in the draft LAP as proposed by Wicklow County Council and the quantum of zoned land as proposed by CRHE within the CRHE/Roadstone landholding is outlined in Table 3.2 below.

Table 3-2
Comparison of Estimated Quanta within the Roadstone/CRHE landholding

Zoning	Draft LAP 2017	CRHE Proposal	Difference	Note
R-HD	27.5ha	38.5ha	+11ha	The increase in residential provision supports the provision of mass transit, such as Luas. It is proposed that this area includes local open space of 0.95ha, as per Figure 2.
AOS	18ha	10.9ha	-7.1ha	The redesigned area as proposed by CRHE and as shown in Figure 2 above provides a more functional and usable open space and includes a 1.2ha school site, if required.
OS2	17.1ha	12.1ha	-5ha	This area reflects the 'greenbelt' area under the existing LAP and masterplan and excludes land within the waste licence area.
VC/NC	0ha	0.69ha	+0.69ha	The provision of VC zoning provides a southern frontage to the village centre.
	c. 62ha	c. 62ha		

3.3 Density

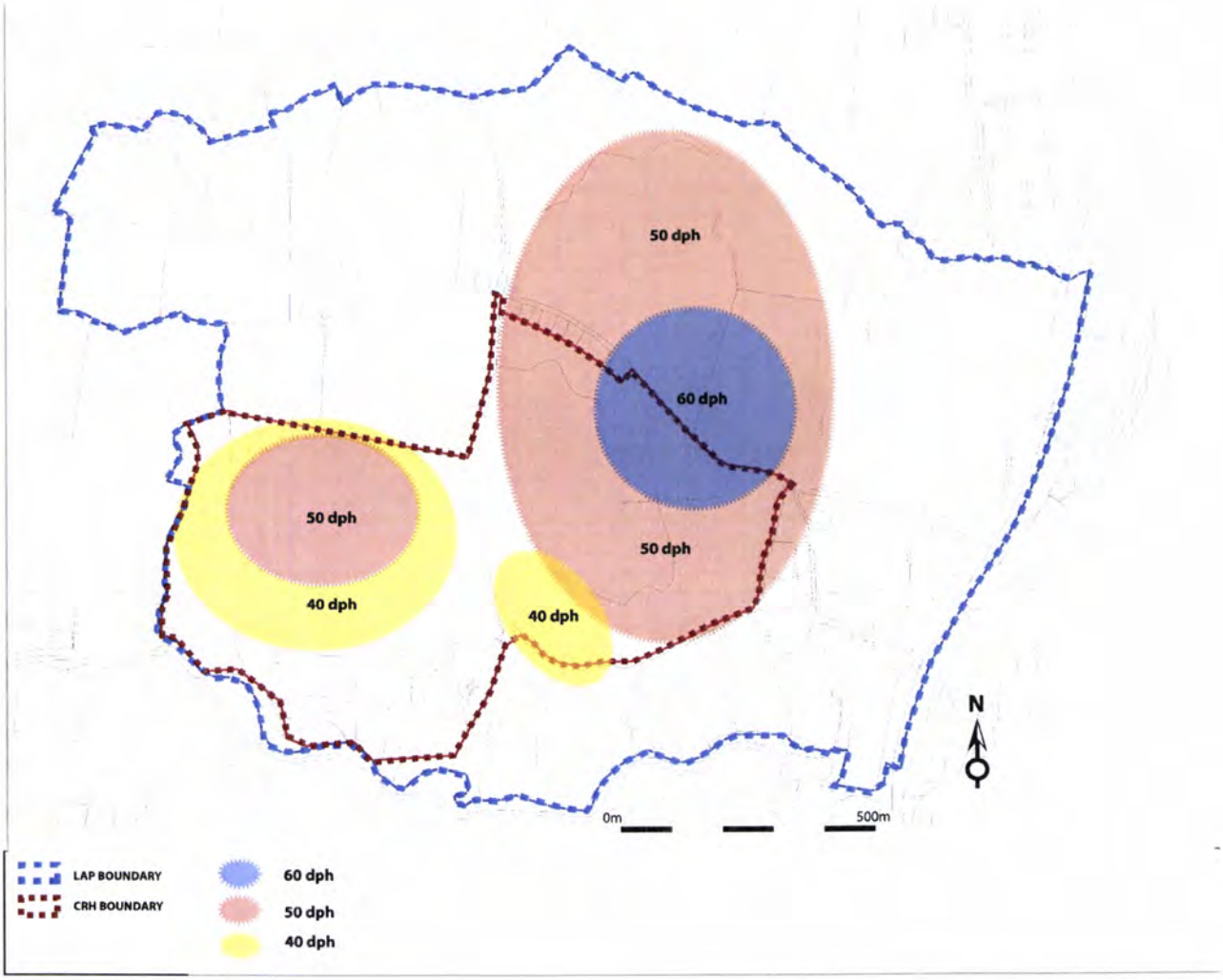
Under policy R2, Wicklow County Council requires a density of not less than 50 units on lands zoned R-HD

In order:

- to meet Wicklow County Council's requirement for an overall density of 50 units per hectare;
- to provide greater flexibility regarding the distribution of densities across the site;
- to provide greater flexibility in relation to the type and design of dwelling units and to provide for a variety of household types;
- to provide for appropriate densities adjoining the OS2 zoned land;
- to support the provision of Luas or another form of mass transit;

CRHE proposes the clustering of higher densities around the neighbourhood centre; the provision of 50 units per hectare across the majority of the Action Area; and the provision of some lower density areas in the proximity of the OS2 zoning (refer to Figure 3).

Figure 3
Proposed Indicative Densities

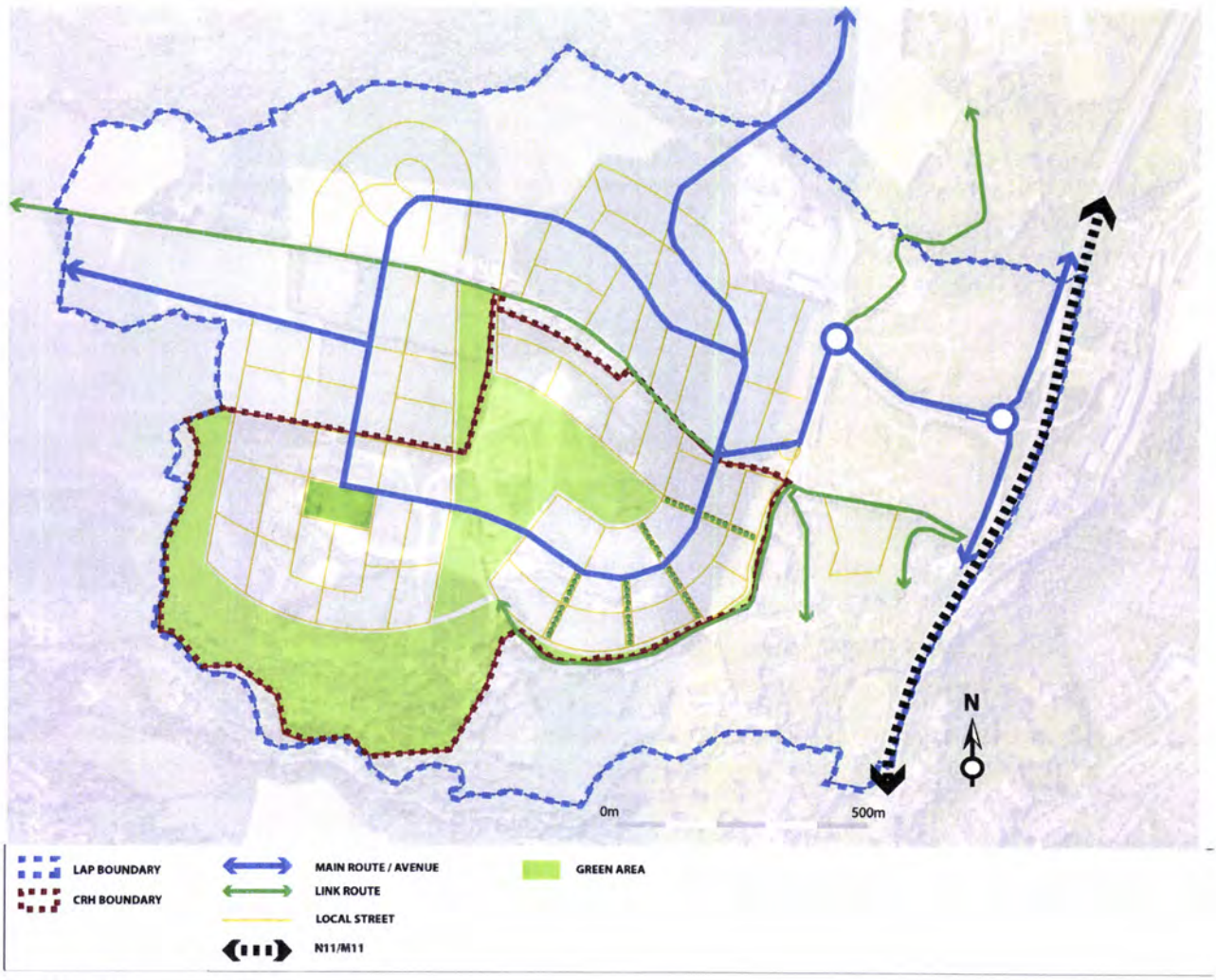


Source: Loci

3.4 Urban Structure

CRHE notes that the proposed zoning plan and concept plan under the Draft LAP does not provide any indication of urban structure. In order to provide a firmer foundation for the development of an Action Area Plan and given the scale and importance of the Fassaroe development site, CRHE considers that an urban structure plan should be included in the draft LAP as per Figure 4. The urban structure provides for a new link road along Berryfield Lane, a bridge across the Ballyman Glen and the urban structure as currently proposed within the Cosgrave Property Group landholding (ref. 16999).

Figure 4
Proposed Urban Structure Plan



Source: Loci

3.5 Phasing

It is also considered that a more detailed approach to phasing should be included in the Local Area Plan. Again, this would provide greater certainty and would facilitate the development of an Action Area Plan. The outline phasing plan below (Figure 5) relates to the development of the CRHE lands on the basis that the timescale for the development of other lands within the Action Area is not currently known.

Phase 1A provides for the development of the neighbourhood centre to the south of Berryfield Lane, residential development, the identification of a school site, the provision of part of the active open space, the development of the avenue and the development of the school site, if required.

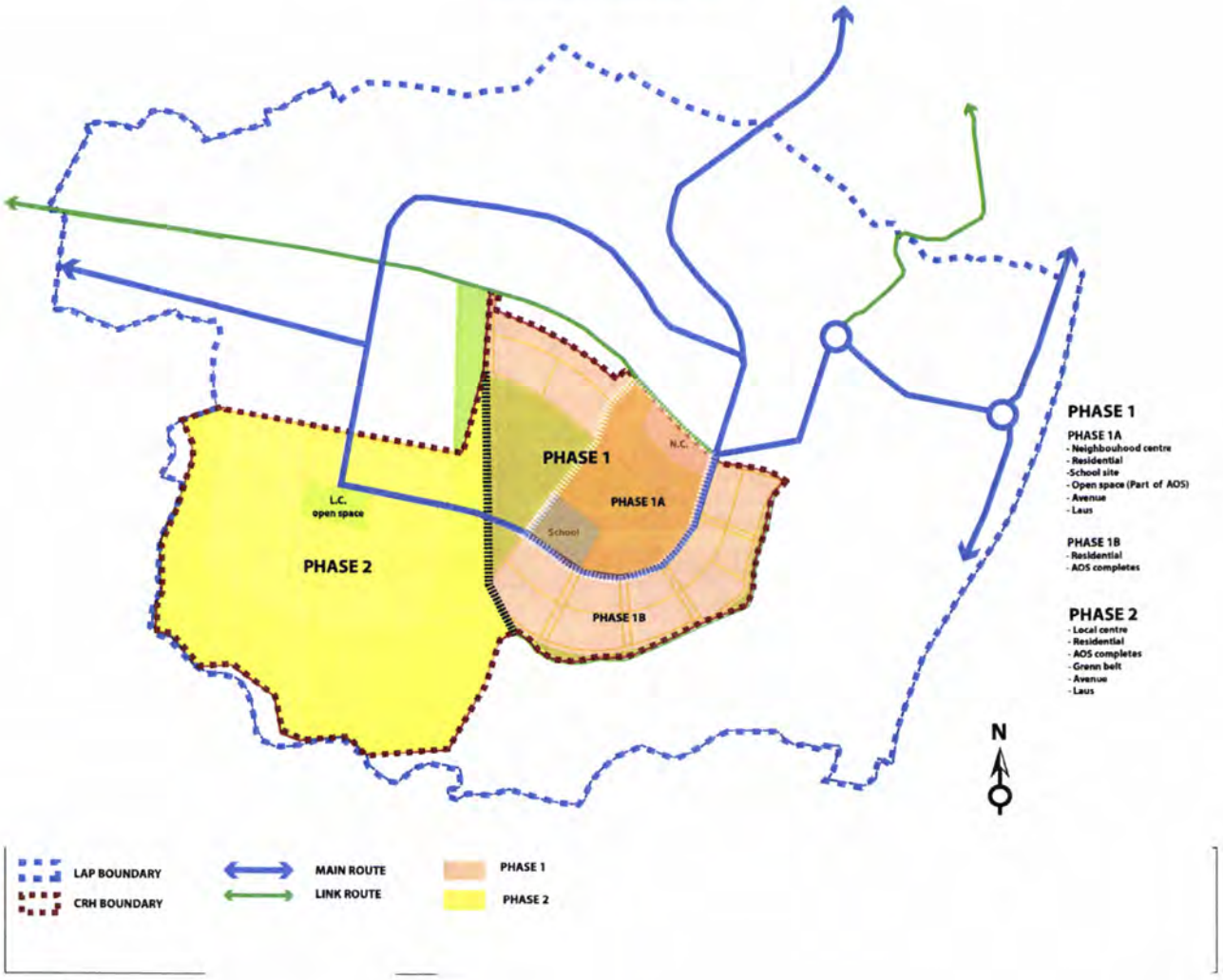
Phase 1B provides for the development of further residential development and the delivery of part of the active open space.

Phase 2 provides for the development of a local centre, further residential development, active open space, the completion of the avenue and the provision of local open space. The area of OS2 land within the CRHE landholding would also be completed in Phase 2

All phases provide a reservation for the delivery of Luas.

This phasing plan ensures the delivery of critical local services, active open space and a school in phase 1A to ensure that residential development benefits from the necessary facilities and social infrastructure, if required, from the outset. This phasing plan also ensures that suitable village centre facilities can be provided notwithstanding any delays in the delivery of a village centre to the north of Berryfield Lane.

Figure 5
Concept Phasing Plan



Source: Loci

3.6 Transport Infrastructure

The National Transport Agency recently published the Greater Dublin Area Transport Strategy 2016-2035. This strategy does not refer to the provision of a Luas line through Fassaroe, unlike the previous strategy for the period 2011 - 2035. Based on the updated strategy, it is anticipated that the extended Luas line will pass through Shankhill and the golf club lands to the east of the N11 and will likely terminate at Bray.

Notwithstanding the above, the County Development Plan and the Local Area Plan is predicated on the possible extension of the Luas to Fassaroe. Within the draft LAP, Sections 2.2.7 refers to the extension of the

Luas to Fassaroe; Section 8.1 refers to the bringing of Luas or other mass transit to Fassaroe; policy PT3 refers to the provision of Luas or other mass transit to Fassaroe and the need for necessary stabling and infrastructure to be provided in respect of Luas or mass transit at Fassaroe; policy PT3 also refers to the creation of linkages from Enniskerry to the BRT/Luas terminus in Fassaroe; policy PT5 refers to facilitating the extension of Luas to Fassaroe; Chapter 10 refers to the changes to the proposed Luas extension to Bray and the need to retain the possibility of the Luas extension to Fassaroe; and item 4 of Chapter 10 requires the Action Area Plan for Fassaroe to provide for Luas or other mass transit infrastructure and any necessary depots or stabling.

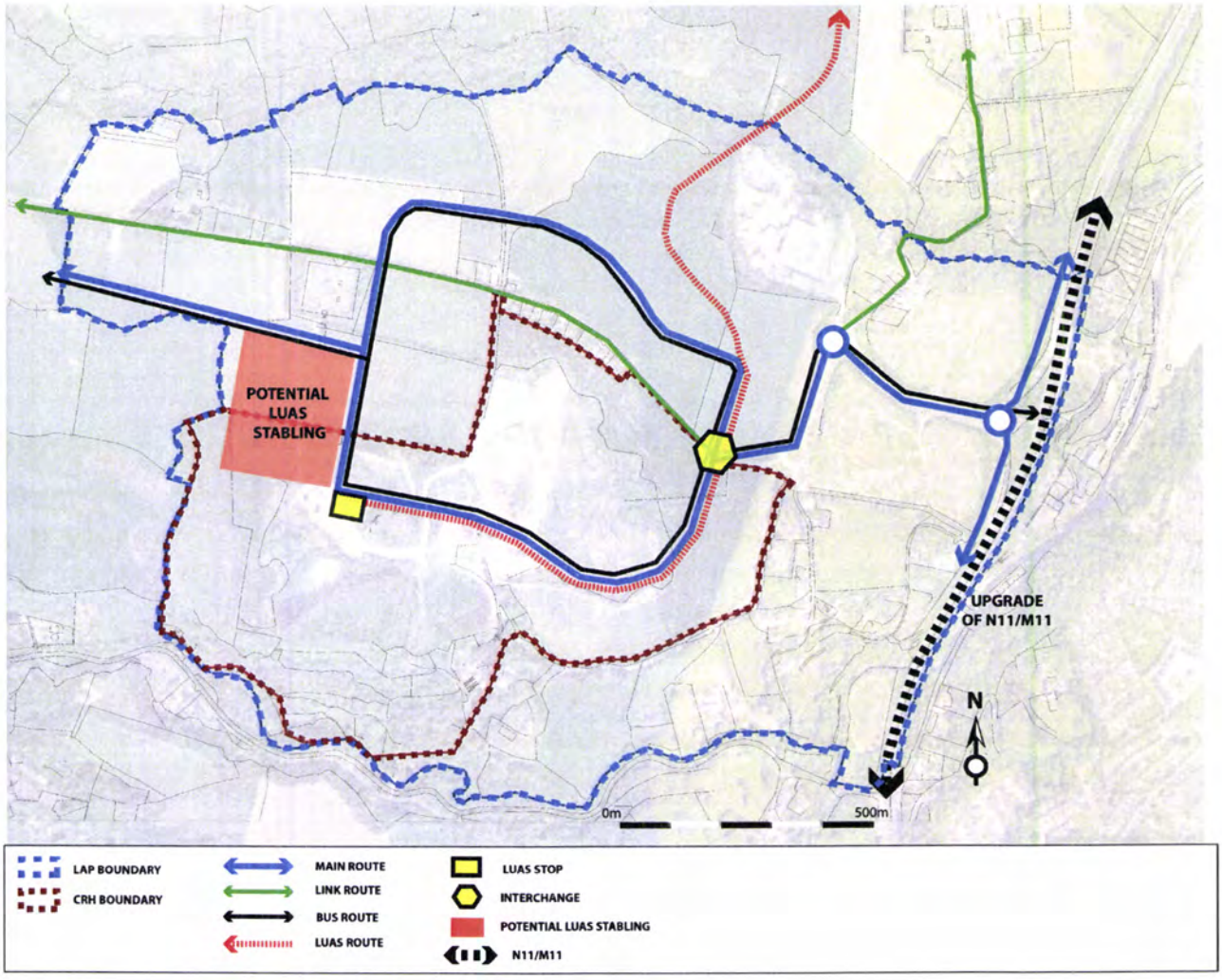
In addition, policy RO4 requires the provision of a new road across the Ballyman Glen, which would potentially carry the Luas. The Dun Laoghaire Rathdown County Development Plan 2016 – 2022 also indicates the Luas alignment through Old Connaught to the boundary with Wicklow and includes a specific local objective to co-operate with the NTA and Wicklow County Council in the establishment of a road/Luas bridge to provided connections between Old Conna and Fassaroe. The M11/N11 Needs Assessment Report by the Transport Infrastructure Ireland refers to the development of a new local road west of the M11 between junction 4 and junction 6 which links Thornhill Road to Fassaroe as per the Fassaroe Masterplan.

Given the location of the site and the existing capacity of the N11, it is considered that public transport will be required to allow the completion of the development at Fassaroe. It is considered, however, that the delivery of Luas is unlikely, or at least uncertain, given that there is no strategic objective or funding to provide same. It is considered that the provision of public transport should be examined in further detail and that the possibility of a Bus Rapid Transit (BRT) hub should be given detailed consideration. The redesign of the open space, as proposed by CRHE, facilitates the delivery of additional residential development and helps to provide the critical mass to support mass transit.

In order to provide greater certainty in advance of the preparation of the Action Area Plan, it is considered that an indicative movement plan should be included in the draft LAP, showing the potential location of Luas stabling, a Luas stop, the alignment of the Luas tracks and the crossing point over the Ballyman Glen, as per Figure 5 below. Alternatively, this proposal for Luas alignment and stabling could provide for BRT depot and route. Given the uncertainty surrounding the delivery of mass transit and the need for housing, it is considered that the phasing of development should not be linked to the delivery of mass transit. It is considered that the delivery and funding of a major public transport infrastructure is beyond the scope of an Area Action Plan and that this matter should be addressed in more detail in the LAP.

It is considered that the draft LAP should clarify when the proposed bridge and road across the Ballyman Glen is required and whether the delivery of this road and bridge is linked to the phasing of built development.

Figure 6
Indicative Movement Plan



Source: Loci

4.0 Conclusion

CRHE welcomes the proposal to reduce the level of employment zoning within Fassaroe on the grounds of the existing jobs growth targets in the Wicklow County Development Plan 2016 - 2022 and the existing availability of zoned employment land. CRHE also welcomes the provision of additional housing land on the grounds of the pressing need for the delivery of housing in a town that is constrained by geography and administrative boundaries.

Notwithstanding this, it is considered that to facilitate the development of an Action Area Plan, further detail regarding the future development of Fassaroe should be provided. It is considered that for the Action Area Plan process to work effectively, the objectives and development standards in relation to Fassaroe should be developed considerably. Further detail regarding urban structure, the provision of schools, the provision of public transport and public infrastructure, densities and phasing are required. To facilitate the provision of this within the draft LAP, CRHE has prepared further information for inclusion in the final iteration of the LAP.

It is also considered that in order to provide functional and well-used open spaces, the proposed requirement for Active Open Space as outlined in the draft LAP should be reconsidered. The focus of the LAP should be design quality and usability. The vast expanse of Active Open Space may not best serve the needs of the future residents of Fassaroe. In addition, the OS2 Open Space, as currently proposed, includes areas of land that are within the waste licence area and are neither undeveloped nor natural.

CRHE requests that the considerations set out in this submission are incorporated into the Bray Local Area Plan. CRHE would welcome an opportunity to meet with Wicklow County Council to discuss the draft LAP in conjunction with other key stakeholders

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