

C73

**Leonora Earls**

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**From:** Ben Crowley [b...@...com]  
**Sent:** 14 September 2017 21:35  
**To:** Planning - Plan Review  
**Subject:** Kilmacanogue development plan  
**Attachments:** Submission re Kilmacanogue Ben Crowley.docx

Please find attached my submission on this

Ben Crowley

Ben Crowley  
Bramley Cottage  
Bohilla Lane  
Kilmacanogue  
Co Wicklow

September 2017

Submission to Wicklow County Council

As a teenage resident of Kilmacanogue, I was most disturbed to see the new proposed development plan as it pertains to the Kilmacanogue area for a number of reasons.

### **Lack of services for young people**

I have grown up in the village and travel by car to school each day. As I grow older and look towards attending college in Dublin in the future, the lack of public transport in the area is of concern to me. The bus services are unreliable. In addition, there are no places for young people to go in the village outside of the GAA club.

### **An inspiring place**

This area has inspired people to do great things, including the Mount Everest mountaineer Chris Bonnington, who walked the Little Sugarloaf with his grandfather and credits those walks with his love of mountaineering. I would like to see that we preserve this beautiful area for my children and grandchildren, so they can walk the area and be equally inspired to greatness. Development of the Little Sugarloaf will not encourage people to visit this area as it will lose what makes it special.

### **The proposed rezoning on the Little Sugarloaf**

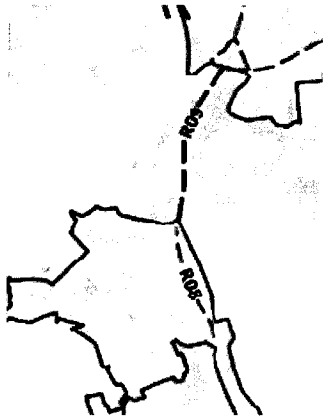
Included in the plan is an area at the base of the Little Sugarloaf that it is proposed to rezone for commercial and residential use. It is clear from the plan, despite the wording around it, that it is the start of a bigger objective to link the village of Kilmacanogue to Bray. It is in the plan that the road is a necessity to deal with traffic from the homes and businesses that currently link on to the N11 frontage. The Transport Infrastructure Ireland (TII) clearly states in its report that this road is unnecessary. It states in the TII report

*...it has identified that all land acquisition required for the long term improvements would need to be acquired on the western side between Junction 6 Bray Central and Junction 8 Kilmacanogue. It is therefore possible for the full length of the southbound mainline upgrade to be completed within the existing road corridor.*

It further states

*Limited benefit to the operation of the N11 via reduced flows and considered superfluous with mainline and junction improvements between Junctions 7 and 8.*

It is clear that the reason the Council is proposing this rezoning is to encourage the development of the area not for the insertion of a road to ease the traffic issues of the N11 but to create the development that will eventually link the village to Bray and in order to pay for said road, the development of the lands will fund this unnecessary roadway. Over time, as we have seen all too often, the scope and creep of poorly thought out development will expand. This is further reinforced by the inclusion of R08 on the development plan, and linking to R09 a proposed Greenway, however the naming of it as R09 further indicates it is a road not a greenway. When I asked the planners at the public display they confirmed that it was a proposed greenway road not a path/track. It is clear that the aspiration is to link the two as is clearly shown on the map below.



The plan states of R08:

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Clearly this is at odds with the TII plan and just a mechanism to open this space. If anything this R08 should be an amenity pathway not a road. The TII plan should be implemented and the development plan of the area should focus on making Kilmacanogue a village again not a collection of poorly thought out housing and commercial developments perched on a mountainside that is recognised for its outstanding beauty. Examine the possibility of a pathway open to walkers, cyclists, riders but not cars that runs along the river at the base of the Little Sugarloaf. Create a greenway that enables people to come from Bray and walk/ride/cycle in the area and return to Bray without having to access the N11.

### **Retaining The Rural Village**

The Plan objectives are stated as follows:

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The plan details are at odds with the objectives. The proposal looks at carving into the landscape which is at odds with the statement:

*In these settlements it is essential that growth is supported while also strictly controlled so that development is undertaken in a manner that is respectful to the character of these towns and the environmental sensitivities of the rural area. It is of utmost importance to ensure that the design of development is appropriate to the rural setting within which these towns are situated.*

As a small village, we punch above our weight in relation to the natural beauty that surrounds us. The Little Sugarloaf and the Great Sugarloaf attract many local walkers, but more importantly they attract walkers, cyclists, horse riders and tourists from further afield with thousands of people from Dublin and the surrounding areas walking the hills on a regular basis to enjoy the natural flora and fauna. It is vital that this amenity is kept for future generations to enjoy and that the wildlife, views and landscape are preserved. It's easy to take the short-term view however we as villagers have to live with the long-term regrets and to be accountable to those visitors for the destruction of our village and these delicate amenities. We should be looking at how we can create a 'green' village by

infilling with houses where possible around the village before ever looking to carve up the mountainside. Development, if any, should be slow and considered. Create a centre where we can come together as a village with some village services, not a collection of houses. This should be the priority.

The plan states

*The town of Kilmacanogue is spread out, with no real definition in terms of a town core and over the years the N11 has come to dominate the town.*

Please do not compound the issues by randomly expanding the village creating further division with no centre. The planned rezoning contradicts the statement;

*..to encourage the development commercial and community development in the core, particularly that which can contribute towards creating a more defined 'town centre' and town streetscape; and to allow for the development of housing on infill, rather than out of centre, sites.*

Destroying an area of outstanding natural beauty is not the way forward.

### **Impact on Wildlife & Landscape**

Any given evening there are wild deer on the hill, pine martens hiding in trees, pheasants roaming freely and other wildlife around that contribute to the beauty and uniqueness of the area. Development pushes this wildlife further afield. Further consideration should be given to awarding the area the SAAO status as was previously advised by John Gormley when in office. All development impacts wildlife and we need to consider them and the local flora when making any decisions. I would recommend a study is undertaken to protect the unique trees that exist in the village on the grounds of Avoca Handweavers and beyond. There are trees there that are the best specimens in the world. These are worth preserving. The plan states

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The plan states;

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*...to promote this area for tourist uses and for residential use, with an animated and high quality streetscape, whilst ensuring the protection of the special character and heritage of this area.*



How can you protect the special character and heritage if you put in a new housing estate, road and commercial premises on the area across from the centre of the village. Eating into the Little Sugarloaf is counter intuitive to this.

**Doing the Right Thing**

You have the chance to do the right thing now for the long-term sustainability of the area and it is incumbent on you as a Council to listen to the wishes of the people, particularly the local people, in relation to this. There are Councillors who will vote on this proposal who are not familiar with the area which is a great shame. I would invite them to familiarise themselves with Kilmacanogue before taking that vote that will ultimately impact generations to come. Ultimately, I would like the proposed rezoning not to go ahead and for the plan to make more of the potential in the area for the development of a centre for the village and a tourist area for visitors and locals alike. We must preserve the amenity for future generations.

**Leonora Earls**

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**From:** Mark Crowley [i]  
**Sent:** 14 September 2017 19:21  
**To:** Planning - Plan Review  
**Subject:** Kilmacanogue area development plan submission  
**Attachments:** Submission re Kilmacanogue Mark Crowley.docx

Please find attached my submission in relation to the development plan for the Kilmacanogue area as part of the Bray Municipal District plan.

Mark Crowley

Mark Crowley  
Bramley Cottage  
Bohilla Lane  
Kilmacanogue  
Co Wicklow

September 2017

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### **The proposed rezoning on the Little Sugarloaf**

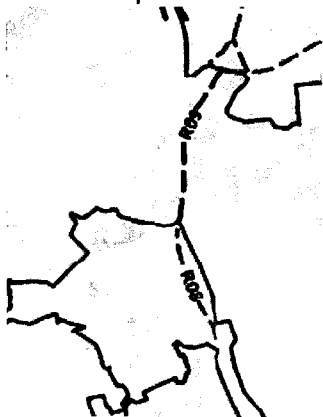
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**Leonora Earls**

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**From:** Pauline Crowley [i]  
**Sent:** 13 September 2017 22:35  
**To:** Planning - Plan Review; 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. 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  
**Subject:** Submission Regarding Kilmacanogue Development Plan  
**Attachments:** Submission re Kilmacanogue P Crowley.docx

Dear Wicklow County Council and elected members

Please find my submission in relation to the Bray Municipal District plan with particular interest in the plan as it pertains to Kilmacanogue.

I invite you to read and take on board my points whilst you consider this plan.

yours sincerely,

Pauline Crowley  
Bramley Cottage  
Bohilla Lane  
Kilmacanogue  
Co Wicklow

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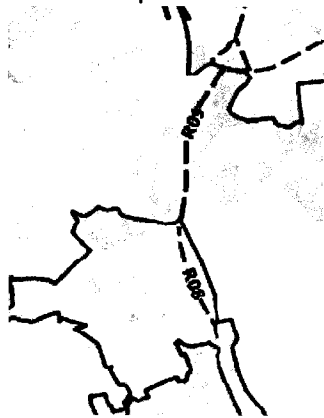
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**Leonora Earls**

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**From:** Charlie Cummins [  
**Sent:** 03 September 2017 10:01  
**To:** Planning - Plan Review  
**Subject:** Objection to Bray Municipal District Local Area Plan

To: Wicklow County Council

I am a resident of Hollybrook Park in Bray, close to the Kilruddery Estate and I wish to lodge an objection to the Bray Municipal District Local Area Plan for the Little Sugarloaf on the following grounds:

- A concern over the proposed access to the new development via Kilruddery Estate and via the proposed pedestrian/bicycle access through the existing green area in Hollybrook Park.
- Traffic congestion on the Southern Cross is already a problem at peak times. Adding more houses and industry will certainly only make this worse.
- Flooding concerns – in heavy rain our garden gets very water-logged as it is. Removing areas of natural drainage on the Little Sugarloaf will increase the potential for more serious instances of flooding.

Thank You

Charlie Cummins

C77

**Leonora Earls**

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**From:** ann daly [  
**Sent:** 14 September 2017 20:19  
**To:** Planning - Plan Review  
**Subject:** proposed development of green belt on lower sugarloaf

Dear Councillors

re plan to further develop the green belt lower sugarloaf inc Killruddery and expanding industrial site

As a resident of the southern cross I am opposed to this development on below grounds

1 Presently it can take 10 mins for me to exit estate to get on to the southern cross therefore this road cannot take any more traffic. It is dangerous as it is.

2 Why throw away one of our most beautiful spots here in Bray

3 Flooding is also an issue. At the moment Holly brook residents are experiencing flooding as it is

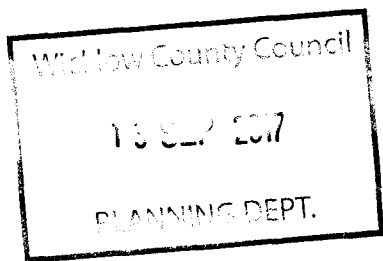
→ There is poor public transport

5 There are vacant sites closer to the town which is almost dead e.g Old dell site

This proposal makes no sense whatsoever. I hope this proposal does not go ahead

Yours truly

Ann C Daly  
13 Swanbrook



C28

Dr Clay Darcy  
166 Belmont,  
Southern Cross,  
Bray,  
Co. Wicklow.

12.09.2017

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



**Re: Bray Local Area Plan – Objection to New Zoning on Kilruddery Estate.**

Dear Administrative Officer,

I wish to express my objection to the proposed rezoning of green field lands on Kilruddery Estate to (R20) New Residential and (E) Special Employment.

As a resident in the area I have a number of concerns about the impact of this proposed rezoning of land, which I would like to outline in this letter. To support my concerns, I would like to draw attention to a number of points identified in the Bray Municipal District Draft LAP 2017 - Appendix A Strategic Environment Assessment (S.E.A.).

(i) The S.E.A. identifies that the “constant encroachment of the build environment on natural habitats and green field will impact natural flora, fauna and biodiversity” (p.22). The green field lands on the Kilruddery Estate are identified as a “sensitive area” (p.49) and a rezoning of this land would pose a risk to the biodiversity of the area.

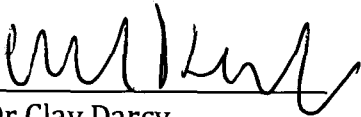
(ii) The S.E.A. recognises how important the “provision of green space and access to the natural environment is also important for population health” (p.24). The Kilruddery Estate and its green fields are an important amenity to local residents, many of whom enjoy walking access to the estate lands. The rezoning of the green field land on the Kilruddery Estate would reduce the green space accessible to those in the area.

(iii) The most significant concern I would to express is impact the proposed rezoning will have on the local transport infrastructure, namely the Southern Cross - R768. Currently, the Southern Cross is significantly congested around peak commuting times, with large volumes of traffic coming from the Greystones Road - R761 and the Bray/Southern Cross Business Parks. The S.E.A. identifies that “outside of the M50 there are significant capacity constraints on providing

for further growth in radial demand on the strategic road network” (p.41). The S.E.A. highlights the increasing levels of congestion on the N/M11 route and this exacerbates the congestion on the Southern Cross - R768. The rezoning of green field lands on the Kilruddery Estate will significantly increase the volume of traffic on an already overburdened route. The impact of increased traffic volume in this area will detrimentally constrict the “strategic movement of high economic value” (p. 41).

The rezoning of green field land on the Kilruddery Estate poses to be disadvantageous to residents of South Bray and the surrounding Southern Cross areas. Moreover, adding to the current constraints on traffic movement on the Southern Cross – R768 has the potential to negatively affect the economic sustainability and viability of the area.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Clay Darcy', written over a horizontal line.

Dr Clay Darcy  
12.09.2017

**Leonora Earls**

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**From:** Jillian Deady  
**Sent:** 12 September 2017 21:10  
**To:** Planning - Plan Review  
**Subject:** Bray MD LAP

12th September 2017

To whom it may concern,

I wish to voice my concern about the proposed rezoning of part of the Kilruddery Estate as stated in the Draft Local Area Plan for Bray by Wicklow County Council. I am concerned that it appears to allow building to take place on the slopes of the Little Sugar Loaf. This is a national, natural treasure, it is part of our geological heritage and I believe the Little Sugar Loaf should be protected and preserved for future generations.

Yours sincerely,

Jillian Deady  
154 Hollybrook Park,  
Bray,  
Co. Wicklow.

**Leonora Earls**

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**From:** Peter Byrne [mailto:peter@deepdalesresidents.com]  
**Sent:** 14 September 2017 16:58  
**To:** Planning - Plan Review  
**Cc:** francesmnolan; paul murray; Claude Peyron; Paul Sweetman; Paul Williams; Sarah Wray; Jason Plunkett; Jonathan Chawke  
**Subject:** Observations for Bray Municipal District LAP 2017 from Deepdales Residents Association  
**Attachments:** Deepdales Residents Association Observations on Draft LAP.pdf

Dear Planning Officer,

Please find our Observations document, attached.

with best wishes,

Peter

Peter Byrne  
Hon Sec  
Deep dales Residents Association  
15 Deepdales  
Bray  
Co Wicklow

# Deepdales Residents Association

Hon. Sec. Peter Byrne  
45 Deepdales  
Bray  
Co. Wicklow

Executive Planning Officer/s  
Wicklow County Council  
County Buildings  
Wicklow

12th September 2017

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

*\* With ref. to Land Use Zoning Map No.2 proposals for lands south and east of Deepdales Estate*

Dear Planning Officer/s,

We write representing the views of Deepdales Residents as communicated to us. A number of our residents are adjacent landowners to the Killruddery estate, and the full and many impacts of any potential land use change therein would be severely experienced by the residents of Deepdales.

Residents are most deeply concerned about (1) any attempt to change the land use indicators for the lands above and behind Deepdales, and (2) proposals to include an inappropriate dwelling unit component deep within the curtilage of the Killruddery estate.

We would like to make the following considered **2 x Main Observations** with reference to the above Draft Local Area Plan, with specific reference to the local areas near to Deepdales estate.

## **MAIN OBSERVATION 1**

**We are deeply appreciative to note that the newly created Settlement Boundary reinforces the protections that we saw introduced in the LAP 2009-2017.**

**We note also with grateful thanks the specific continued inclusion of the OS1 Open Space land use zoning above and to the east of Deepdales.**

We put much effort and research into submissions made prior to and during the draft stages of the existing LAP, in 2008 and 2009. I refer to letters, photographs and maps submitted at that time:

- (1) Submission 1 of 2: 22nd December 2008
- (2) Submissions 2 of 2, including photographs and maps: 5th January 2009



Ask S

Residents of Deepdales were very much in appreciation of the decision taken by Planners and the Council at the time to protect the lands above Deepdales by the adoption of Open Space and Greenbelt land use indicators in 2009.

We felt that it resonated with the overall aims of the County Plan, and of specific aims to protect areas of high visual amenity, and to protect our residents from exposure to unacceptable levels of disturbance were those lands developed for anything other than recreation-related uses.

However, we are very conscious of the existing commercial zoning remaining on the portion of lands to the east and above the existing Woodies property, and we note with concern the several planning applications over the years for ca. 7,000 m.sq. of offices in 7 blocks. It is often noted locally, with reference to various sources, that these lands should never have been zoned commercial, and there remains a distinct moral question as to why a “cut out section” of the AONB was removed by the Council pre-2000 purely to facilitate the potentially profit-making rezoning of what was two large fields, at an inappropriate elevation, and unacceptably close to residential development.

**Our Observation No. 1 therefore relates to the way in which the Draft LAP does not make reference to the land use zoning for the lands outside the Settlement Boundary—specifically we refer to the fields south of the Reservoirs and east, above the Open Space zoning, all above Deepdales.**

**These fields were zoned Green Belt in the 2009-2017 LAP.**

**They fall within the boundary of the overall Municipal District Boundary.**

**Therefore, we are asking that these fields be included in this draft LAP and clearly protected as they are at the moment, in the 2009-2017 LAP marked Green Belt.**

We feel that there exists a vulnerability on account of the commercially zoned lands directly to their west, adjacent in fact (though there is supposed to exist a “ransom strip” of land in between, as promised by the developers to Deepdales Residents at the time).

We would consider the addition of this clear protection—such as exists in the current LAP—to be a continuation of a very positive approach to the use of these very sensitive lands at a high elevation. In previous years there was hope of a Green Corridor and encouraging further recreation-based opportunities, including employment—in such a way that fits in with the needs of local residents and is true to the aims of the County Plan with regard to sustainable and appropriate land use, especially in high amenity areas.

**In this regard, though not within the scope of this Draft LAP, it is imperative that the not-yet enacted SAAO is initiated and formally put into place, as it relates very specifically to these lands.**

We offer the following detailed comments relating to this Observation No. 1:

### **1.1 Topography**

“The lands are situated in a visually sensitive area at the foot of the Little Sugar Loaf, south of a housing estate”

(from the Environmental Report of the Bray Environs Local Area Plan 2009-2017, Strategic Environmental Assessment, p.8)

One of the factors, perhaps more than any other, that needs to be considered when looking at these lands above and south of Deepdales is that there is an unusually steep climb in height in a short distance—which means that the ground level of the lands proposed for rezoning in Killruddery is at the roof height of the Deepdales houses immediately adjacent.

This would clearly create many problems if there were to be any future development, in terms of noise transfer, loss of privacy, etc. for existing residents who have for nearly 20 years lived without such intrusions.

The effect on immediately adjacent homes would be unbearable, and unacceptable.

## **1.2 Potential Noise and disturbance**

Deepdales residents are deeply concerned about the impact of noise disturbance that any proposed future development might have on the fields above Deepdales—not only during any construction phases but also ongoing noise disturbance from any development, not least increased traffic noise.

A feature of the local geology and landscape is that low frequency noise (mechanical etc.) travels further than usual, and Deepdales residents have experienced significance disturbance during previous construction phases of the nearby Retail Park.

The elevation of the lands in question is a significant factor

## **1.3 SAC, SAAO and AONB: Habitat and Open Space**

Ref. Environmental Report of the Bray Environs Local Area Plan 2009-2017  
Strategic Environmental Assessment, p.3 & p.106

“Proposed Natural Heritage Areas (NHA), Candidate Special Areas of Conservation (SAC), Area of Outstanding Natural Beauty (AONB), a Special Amenity Area Order (SAAO), Greenbelts, and Protected Views and Prospects.”

Some of the fields that are proposed for rezoning are bordered on three sides by a **proposed SAAO area that is simply awaiting its enactment.**

The lands for proposed rezoning are located on the lower slopes of the Little Sugarloaf. Both the Great and Little Sugarloaf mountains are designated as an **Area of Outstanding Natural Beauty (A.O.N.B.)**

Any built development at the elevation of these lower slope fields would be a significant loss of habitat and open space on the edge of a largely urban area, and would represent a backward step in terms of Ireland’s conformity to EU Habitat Directives.

We also reference the 2009-2017 Bray Environs LAP Part B page 7, **Settlement Strategy**, Chapter 3.0 wherein it states that the “lands to the south of Bray were not considered suitable for high density residential and employment development given their location within an Area of Outstanding Natural Beauty and adjacent to an area that the Minister for DoEHLG has requested for a Special Amenity Area Order to the south”

“A linear form of open space is also proposed within the Killruddery Demesne ... designed to meet the needs of the adjoining residents and to minimise the impact of the development upon the lower slopes of the Little Sugar Loaf Mountain.”

This linear open space would not be possible if the lands are at risk of losing their Green Belt status.

#### **1.4 If these vulnerable higher lands were to be developed:**

Deepdales residents would envisage the following issues.

- **Traffic Congestion**

- **Loss of Landscaping Cover and Trees**

- **Manufacturing Odours and Emissions**

We have already had environmental issues of this kind from existing industrial premises located in the IDA Business Park, and have had our concerns acted upon by the EPA.

We have an additional very long-running unresolved issue with strong unpleasant cooking odours from the Avoca Central Kitchen Unit, located directly on our boundary, and we do not want a repeat of this.

- **Loss of Visual Amenity and Light Pollution**

With regard to “**Protected Points of View**” from the Southern Cross Road, and other locations to the north. Any built environment development on these lands will be seen for at least 30 miles in all directions—especially when lit at night.

- **Loss of Value**

Lands rezoned for any other use than the present Green Belt would have a tangible negative effect on the quality of life for Deepdales residents, and thus in addition would also have a negative effect on the value of properties in the estate. Even under present property market stresses, the properties in Deepdales have a combined market value of ca. €50 million. We do not intend to see that value diminish through badly directed planning initiatives.

- **Management of water**

As local authorities all across the EU and beyond are discovering, there is a negative result upon both surface water and artesian water volume management, when previously green field environments are given over to built environment. There is presently already a problem with artesian water flowing under pressure from nearby lands, lying as they do on the relatively steep northern slopes of the Little Sugar Loaf, with consequent water outflow onto the Southern Cross Road and onto Giltspur Lane.

- **Supply of Water, Waste & Utility Services**

It is known that supply of these services has reached maximum provision point for the local area, and to consider any even modest built environment is likely to have a negative effect on the supply of those services for existing residents.

## **MAIN OBSERVATION 2**

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We wish to make an observation that the proposed residential component suggested within the curtilage of the Killruddery estate, that would allow for in excess of 200 dwellings, is inappropriate for many reasons.

### **2.1 Noise and Loss of amenity:**

Future possible vehicle access to potential employment or residential units on the Killruddery estate, via Giltspur Lane and the land above Deepdales, would cause unacceptably high noise levels to Deepdales residents and the loss of rural amenity to what has been a rural landscape for hundreds of years, and is now an area that bounds AONB and SAAO status.

### **2.2 Local Area Traffic:**

Whilst recognising the national and local need for housing, the housing component of the plan suggests an inappropriate large development in a local area that already has frequent traffic issues.

There is a significant build-up of traffic at all peak times on the Southern Cross Road, and with a likely AADT of 12,000 or higher at present the road is already carrying twice its intended capacity. As far back as March 2000, there is reference to "existing congestion problems" from the Roughnan O'Donovan Consulting Engineers Traffic Impact Report, Ref. 00-114, 3<sup>rd</sup> March 2000, paragraph 2.1.

This traffic congestion not only creates problems on the Southern Cross Road itself, causing delay to all residents and other local businesses not only at peak times, but more seriously when there is any kind of a pressure traffic incident on the N11, the entire Southern Cross becomes gridlocked with the existing flow of traffic, and this is a serious safety risk in terms of emergency services access. Any further immediately local development would exacerbate the existing problem.

### **2.3 Lack of coherence:**

The rezoning suggesting residential housing development is in a local area that has no supporting shops or other essential local infrastructure, including very limited public transport. It is inappropriate, and clearly not part of a coherent plan. We are very conscious in this local area of the lack of local infrastructure, e.g. public transport, and a plan to increase housing units would only make sense to us if ensuring the necessary local supports are in place for those units.

We respectfully submit the above observations.

Yours faithfully,

Peter Byrne  
For and on behalf of  
Deepdales Residents Association

**Leonora Earls**

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**From:** Brian []  
**Sent:** 07 September 2017 15:49  
**To:** Planning - Plan Review  
**Cc:** tomanesely@yahoo.co.uk; 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; stevengreenbray@gmail.com; olobrian@gmail.com; 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:** Objection to rezoning of lands on the Southern Cross

Dear all,

I wish to object to the rezoning of lands on the Southern Cross in Bray for the following reason.

Traffic – the current volume is far too high for the road particularly at peak times e.g. school times.

Lack of public transport – there is limited public transport serving this area at present.

No retail / amenities – we have no shops or amenities within walking distance – to buy a pint of milk is a car journey away.

Address

48 Swanbrook

Bray

Co Wicklow

Yours faithfully

Brian Delahunty

**Leonora Earls**

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**From:** Alan Michael Dempsey [  
**Sent:** 15 September 2017 14:18  
**To:** Planning - Plan Review  
**Subject:** Submission to the Bray Municipal District Draft Local Area Plan Public Consultation  
**Attachments:** Submission the Bray Municipal District Plan Consultation\_2.docx

To Whom it May Concern,

Please find attached my submission to the draft local area plan consultation.

Kind Regards,

Alan Dempsey

# Submission the Bray Municipal District Plan Consultation

Authored by Alan Dempsey

*This submission is written as a lifelong resident of Bray who wishes to see it grow and prosper into a prosper as a place where people happily choose to raise their families and where businesses can invest knowing their growth aided by a population and a council with passion and vision for the future of the District. It is written in a personal capacity only and does not reflect the views of my employers.*

## Introduction

This submission will focus on three issues specifically:

- Housing
- Economic Development
- Transport

## Housing in Bray Municipal District

Both electoral divisions in that make up Bray are significantly older than any other ED in north County Wicklow.<sup>1</sup> They also have a higher proportion of retired citizens as well – over 20% compared to roughly 10-15% in the surrounding areas.<sup>2</sup> Additionally, Wicklow has high number of persons per household than elsewhere in Ireland.<sup>3</sup>

Taken together, these facts suggest that the housing situation in Bray is stretched. In line with national patterns, household size has increased since 2011. This has been widely interpreted as a result of fewer young adults (25-34) being in a position to buy or rent a property and therefore choosing to remain in their family home. Chronic lack of housing supply has led to unaffordable housing. At the time of writing, the average price of the 77 properties listed on daft.ie is €507,000. According to Central Bank borrowing rules, with a requirement of a twenty percent deposit, and a loan no bigger than 3.5 times gross income, a household would have to earn a gross income of roughly €115,000 per year. While average house price is obviously a skewed and imperfect measure of the availability of affordable housing, even taking the median house price does not improve the situation greatly. Housing in Bray still appears unaffordable for most. The median house price in the sample is €420,000, requiring an income of €96,000 a year under Central Bank rules. This is simply beyond the earning power of most young adults.

Given these characteristics within Bray's housing market, any steps to increase that increase the housing supply in a sustainable manner should be welcomed. For instance, a better mix of housing might encourage some of Bray's high proportion of retired residents to down-size. There is some potential to free up family-sized houses by encouraging older residents in large houses to downsize.

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<sup>1</sup> All-Island Research Observatory Mapping Resources. Available at: [http://airomaps.nuim.ie/id/Census\\_2016/SR\\_PT1/](http://airomaps.nuim.ie/id/Census_2016/SR_PT1/)

<sup>2</sup> All-Island Research Observatory Mapping Resources. Available at: [http://airomaps.nuim.ie/id/Census\\_2016/SR\\_PT2/](http://airomaps.nuim.ie/id/Census_2016/SR_PT2/)

<sup>3</sup> CSO. Available at: <http://www.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=E4032&PLanguage=0>

This requires an adequate supply of suitable smaller accommodation such as two bed houses and high-quality apartments in areas that are easily accessible to local services and amenities. Even in urban areas across Ireland, 85% of residential properties are houses, only 13% are apartments. Not all Irish people need or want to live in houses – detached or otherwise – with up to four bedrooms.

For many younger residents, locked out of an unaffordable housing market and unable to afford rents in Dublin, one or two bed apartments or studio apartments are preferable. These types of properties would allow for greater density and cater for the housing needs for a wider section of society. They would also allow younger residents of Bray without families, to live in Bray and commute to the city more easily. Currently, over 50% residents of Bray commute to Dublin City Council area to work, rather than moving to Dublin's larger, but more expensive apartment rental market. A greater number of younger residents might choose to reside in Bray if suitable affordable accommodation was available. More young professionals, who have higher levels of disposable income, could help to create more sustainable economic growth for the district.

New developments in Bray should include a mix of housing types driven by the needs of those in the community. While one must acknowledge that the growing population will obviously require more family homes, by choosing to build a more diverse housing mix that includes smaller properties, the required housing stock of roughly 6,000 properties in the district by 2025 could be reached.

Demand (and subsequently prices) in both the property purchasing and rental markets are driven up by poorly designed government housing policies. While in theory rent supplements and the Housing Assistance Programme are a solution to market failure in the housing market, but in practice, they simply drive up rents by creating additional demand by placing people in the private rented sector who should not be unfairly placed in the private market.

These government programmes effectively act as a subsidy to owners of multiple properties, those who need assistance the least. Local authorities have a role to play in addressing this fact by building social housing. High quality and well designed social housing developments remove people from a housing or rental market that they least able to compete in. This is obviously a challenge that extends beyond the boundaries of Bray Municipal District and requires vision and accurately targeted policy solutions on a national level. However, Wicklow County Council can try address affordability in the district by building social housing where it has the resources to do so, rather than using those resources to subsidise the private market.

Higher density developments are another method of addressing supply-side issues in the housing market. There is a substantial social dividend to be gained by increasing the population density in urban areas. Density that is well designed makes transit and retail more viable, supports more schools and services close to homes, and supports the clustering of development. Higher density allows residents to work, live, play, shop, and learn within a convenient walking distance. Higher densities make walkability possible, and suitable design makes it enjoyable. This creates a sustainability of a community that is more difficult to achieve in lower density areas. Higher density is also a significant boost to commercial activity. Increased density facilitates greater productivity in the economy and leads to increased growth. Productivity is boosted through density as a result of agglomeration effects; matching skills to the needs of the labour market; sharing supply chains and infrastructure; and the exchange of information and ideas among enterprises. It also increases the viability of public transport infrastructure.



Increasing density has the added benefits of reduced congestion, carbon footprint and inefficiencies by minimising time and distances to work and leisure.<sup>4</sup> Densely clustering development also helps better preserve natural areas by reducing the need for sprawling development into rural areas.

## Economic Develop and Creating an Identity for Bray

Steps should be taken to capitalise on the scale of Bray's population and economy. This can be achieved through placemaking. Placemaking is a means of strengthening the connection between people, businesses, and society, and the places they share. Placemaking is about the core strengths and weaknesses of different areas. Recognising what the Bray's strengths and weaknesses are will allow the correct strategies for growth, development, and improving the quality of life to be identified. For instance, Bray has been able to attract a substantial amount of FDI to its industrial parks and estates. The UK government's industrial strategy notes that "certain anchor businesses can play a key role in attracting skilled workers to an area, or generating spin off companies".<sup>5</sup> Therefore it is important to Bray's economy to ensure that the infrastructure and skills needs of these companies are met. Furthermore, the Council should work with the IDA and Enterprise Ireland to attract new FDI and nurture start-up enterprises. The strategy goes on to state that these companies "can attract a whole supply chain to locate near them, bringing further growth to the area." Local policy makers also play a role in facilitating this type of growth by "helping to coordinate the different things that local industries need to thrive, from planning decisions, transport and skills to investments in culture and the quality of life."

It is through these actions that local authorities play a vital role in local economic development. The No Stone Unturned: In pursuit of growth report states that "Growth is everyone's business. Government can set national policies and create an environment where business can flourish, but success depends on businesses and individuals working together."<sup>6</sup> This process of tying people and companies to places will be key to placemaking in the future and improving business conditions and the quality of life in the district.

It is crucial that the town centre and Main Street thrives if Bray is to meet its potential as a regional driver of growth. In this regard, it is fair to say that the Main Street has underperformed over the last decade. From a retail perspective, Bray will never compete with Dundrum shopping centre, and nor should it attempt to. While it is not the place of local authorities to determine what business activities should take place and where, Wicklow County Council does have the capacity to create an identity for this integral piece of Bray's economy and encourage high quality retail locate and thrive in Bray. It just requires the vision to do so. Close collaboration with the Local Enterprise Office on the economic development strategy can help in this regard. It is disappointing that the office is only mentioned once in the draft plan and in very vague and broad terms.

Economic development could be aided by taking small steps to improve the appeal of the Main Street and surrounding areas. Parking charges and fines make up over 2% of Wicklow County

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<sup>4</sup> Gregory, C. (2015) The Density Dividend: Solutions for Growing and Shrinking Cities. Pg 22 Available at: <http://europe.uli.org/wp-content/uploads/sites/127/ULI-Documents/ULI-TH-Density-Dividend-Report.pdf>

<sup>5</sup> Page 120 'Building our Industrial Strategy: green paper. January 2017'.  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/586626/building-our-industrial-strategy-green-paper.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/586626/building-our-industrial-strategy-green-paper.pdf)

<sup>6</sup> Page 26 'No Stone Unturned: In pursuit of growth.'  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/34648/12-1213-no-stone-unturned-in-pursuit-of-growth.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/34648/12-1213-no-stone-unturned-in-pursuit-of-growth.pdf)

Council's income, so their budgetary impact is not negligible. However, research suggests that where there are fixed price on-street parking charges that for parking spaces that are not overly in demand, business activity and footfall can suffer.<sup>7</sup> In short, local authority parking fees are potentially acting as a drag on business activity on Main Street. A more economically efficient means of gathering income that would boost economic activity without negatively affecting local authority income would be to reduce parking fees. While Wicklow County Council would lose some income in the short term, it would recoup the income following a revaluation of non-domestic property in the County Council area in 2021. Increase footfall would and better revenues for businesses in Bray town centre would be reflected in new rateable valuations issued by the Valuation Office that year, leading to higher rates income from the area. Businesses would benefit from increase footfall and the council would not see lost revenue after the revaluation in 2021. This would help to stimulate economic activity by reducing incentives for shoppers to avoid travelling to the town centre.

Making Bray Main Street, and the district more generally, a more attractive place to frequent alongside a coordinated shop local campaign could encourage more residents to choose to spend more time and money in the town centre. Additionally, a well-planned and designed built environment has a number of benefits that extend beyond economic.

As noted by Ibec, "well-kept streets, more greenery and green spaces, maximum amounts of daylight, sound insulation, shared common spaces, adequate personal space in housing; all these factors can be used to create built environments that have a healthier mental impact on their occupants. Research has shown that mental health and physical health are inexorably linked. This strongly suggests that, while it is important to build buildings that promote good physical health, perhaps more emphasis should be placed on making sure that our buildings, streets and neighbourhoods have the best possible impact on our mental health and emotional wellbeing too. Research has shown that greenery and green spaces have a considerable impact on mental health." They go on to state that "Bleak, run-down or littered environments have been shown to increase anxiety among residents and decrease mood."<sup>8</sup>

One area in particular in need of redevelopment, as highlighted by the document, is the area around Bray DART station. This is the first point of contact for tourists and others entering Bray by rail. It is crucial that this area is and appears to be well developed. The site opposite the DART station is currently significantly underused. If properly developed, this site and the surrounding area could prove to be an opportune link between the town centre and the sea front. Were there an effective link, the two could form a prosperous economic corridor for Bray's development that could far exceed the sum of the parts.

## Transport for Bray

Developing quality transport infrastructure is of crucial concern to the effective growth. High value employment requires advanced skills that may not be readily available in nearby areas. The cost and time of travel determines the range people are willing to go for work. Improving the connectivity in will increase the area in which people look for jobs. With a substantial FDI presence in Bray, it is

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<sup>7</sup> Hymel, Kent. "Do parking fees affect retail sales? Evidence from Starbucks." *Economics of Transportation* 3.3 (2014): 221-233.

<sup>8</sup> *Building a Better Future: It's Everyone's Business*. Ibec submission to the public consultation on the National Planning Framework. Pg 121. Available at: [https://www.ibec.ie/IBEC/Press/PressPublicationsdoelib3.nsf/vPages/Newsroom~national-planning-framework-must-redress-regional-imbalance-10-04-2017/\\$file/Ibec+NPF+Submission.pdf](https://www.ibec.ie/IBEC/Press/PressPublicationsdoelib3.nsf/vPages/Newsroom~national-planning-framework-must-redress-regional-imbalance-10-04-2017/$file/Ibec+NPF+Submission.pdf)

highly likely that many are travelling relatively long distances to work in Bray. High housing costs and limited connectivity into and around Bray may disincentivise investment in the town. Improving local connectivity allows a more efficient distribution of skills and economic activity.

Poor transport connectivity has also been linked to social deprivation. Those living in areas that are the most disadvantaged in terms of transport connectivity are more likely to be subject to social deprivation. Compounding the problem is that with poor access to services and jobs, they then suffer from limited opportunities to reduce their levels of deprivation.

From an enterprise point of view, transport can bring firms closer to their supply chain and share expertise, boosting productivity. From a sustainability point of view, better connectivity reduces the need to depend on cars as a means of transport, reducing emissions and easing congestion. Congestion is a major issue not just in Dublin but across all Irish cities.

Currently, there are several connectivity challenges facing Bray. Primarily, the M11/M50 merge is lacking capacity and regularly reaches a standstill during peak hours. It is unacceptable that traffic reaches a halt on a national motorway at a predictable time every day without plans to rectify the situation. Working with the other affected local authorities, the Department of Transport, Tourism and Sport, and Transport Infrastructure Ireland, the capacity and traffic management for the merging point should be a priority for the Council. In addition, further south on the N11, the lower speed limits around Kilmacanogue are acting as a choke point for rush hour traffic. Going forward, alternative options should be explored to prevent this occurring, including examining the possibility of upgrading the road to full motorway status where possible.

With a growing population in the district and higher employment, public transport infrastructure is stretched. This situation is exasperated by the fact that state subvention for public transport cut during the financial crisis has not been fully restored. This has left public transport bodies stretched and unable to improve services or make significant investments in infrastructure. Rush hour DART services are nearing absolute capacity and it is only a matter of time before service quality deteriorates significantly due to overcrowding. The Council should lobby government, Transport Infrastructure Ireland, and CIE and Irish Rail to undertake a detailed study of current and future capacity requirements, with a view to scoping the feasibility of increasing the frequency of DART services. In particular, the link between Bray and Greystones should be examined as only 2 trains per hour currently run between the stations. This is obviously due to the presence of only one track along the line. However, because a return journey takes only 20 minutes between stations, it is possible to run three trains every hour that could shuttle passengers between stations using Bray's third platform if necessary. Planning ahead for the eventuality of overcrowding would significantly improve the quality of services for residents in and around the district.

Finally, I would express concern for the increased traffic congestion that may be caused by the developments in the old Bray golf club site. While I welcome the development of the area for commercial, residential and public services purposes, increased traffic in an area already suffering from significant congestion may prove problematic for the effective functioning of both the new and existing areas.

## Conclusion

I am a firm believer that Bray has the capacity to become a town renowned for a highly developed regional economy and as a desirable place to live because of a high quality of life. In order to achieve this, vision is required. Long term planning and investment in the area will reap benefits that far

exceed the investments required. With a strategy for that is future-proofed for growth and continued improvement in the quality of life, Bray can reach its potential.



Ian and Angela Denver,  
90 Giltspur Wood,  
Bray,  
Co Wicklow  
Date: 06/09/2017

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



Dear Administrative Officer:

We are writing to make a submission in objection to the rezoning of land, adjacent to Oldcourt House, as R20 'New Residential', shown in Figure 1 below. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017).

We have lived in Giltspur Wood for nearly 12 years and gave significant consideration to selecting Giltspur Wood as the estate to raise or future children. We now have 4 children who have grown up in the estate and enjoyed the safety and security of playing out in the green area with their friends.

In addition to the safety aspects of the estate our property backs directly onto the planned rezoned field. Again prior to our purchase we referred to Bray Town Development Plan which zoned the land OS4[Solely open Space] and deemed zoned to "preserve continuous open space along the river valley". We took comfort, from the level of details provided in the plan preparation, that this type of development would not occur in the field to the rear of my family home; in particular, given that it was zoned to ensure no negative impacts on the natural environment of the area; to provide for and the preservation of the open space along the river valley; and the preservation of trees consistent with maintaining the flood capacity of the stream.

The news of the proposed rezoning of this field has brought us a lot of shock, upset, concern and anxiety and we have outlined several reasons for this objection below.





*Figure 1: Extract from draft Bray Municipal District Local Area Plan 2017. The proposed field for rezoning is coloured in yellow and circled in red*

### **1. 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 and a popular play area for our children.
- The popular and child friendly green area, used by my children daily, 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 my children's 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 area. I would find myself in a position of having to restrict my children from playing in such a dangerous environment.

### **2. Wildlife**

The proposed rezoned field and the surrounding land supports a rich and diverse group of wildlife. The boundary of our property faces directly onto the proposed rezoned land and we have, for several years, spotted bats flying around the field on a regular basis.

### **3. 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. A new development in the area would exacerbate this further and has added dramatically to the commute times on a daily basis.

### **4. 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.

- a) WI008-002001-Fortified House/Castle, 600 years old
- b) WI008-002002- the bawn associated with the house-foundations of the wall are still visible
- c) WI008-003-a high cross
- d) WI008-041-Oldcourt House-17th century

### **5. 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 and therefore is a flood risk. Adding developments to this field would also increase the risk of my property to flooding.

### **6. 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.

- a) Order no. 5- Oldcourt House and Vevay House, Swan River Valley.

### **7. Loss of green space**

There would be an additional loss of recreational green space within our existing estate to facilitate traffic to new houses.

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

Sincerely,

Ian and Angela Denver,

Angela Denver  
Ian Denver

IAN & ANGELA DENVER

90 GILTSBUR WOOD

BRAY Co WICKLOW



C84

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



11<sup>th</sup> September 2017

**Ref – Rezoning / Planning Permission “BRAY MD LAP”**

Dear Sirs

Further to the recent publication of Wicklow County Council’s intention to rezone lands to the rear of Giltspur Wood (Bray), I wish to formally submit my objections to this plan.

My objections are based on the following:

1. Increased Car Traffic Volumes – creating higher risk for young children playing on the estate
2. Poor Health & Safety of Construction Contractors - we have unfortunately a track record of injuries from previous developments
3. Increased Services Traffic Volumes (e.g. waste contractors) – the design of the current estate means contractors are already damaging footpaths & grass verges, additional traffic will make this worse
4. Increased Anti-Social Behaviour – the nominated area already attracts anti-social behaviour & opening up the cul-de-sac, as planned, will increase this activity
5. Green Space Reduction – the nominated area will reduce the amount of green space in the local area
6. Lack of clarity on the proposed development plan

Please acknowledge receipt of this communication.

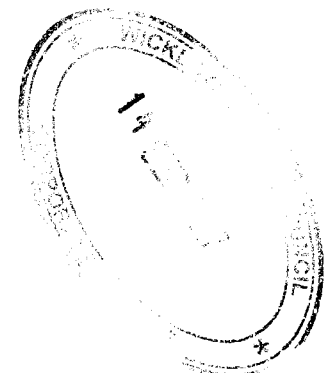
Regards

*Eileen Denvir*  
**Eileen Denvir**

Eileen Denvir, 84 Giltspur Wood, Bray. Co. Wicklow

Pf.

Email -



C&S

**Leonora Earls**

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**From:** Anna Deveney  
**Sent:** 04 September 2017 14:48  
**To:** Planning - Plan Review  
**Subject:** Submission Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** submission.pdf

Anna Deveney, 27 Glendale Drive, Bray, Co. Wicklow A98 V6K5

I wish to make the following observations in relation to the Draft Bray Municipal District Local Area Plan 2017 ("Draft Plan")

## **Chapter 10 - Key Development Areas. SLO 1 Kilruddery**

### **1. Additional Zoning for New Residential/Employment**

#### **New Residential**

Under the Draft Plan there has been an increase in land being zoned residential. The previous Bray Town Development Plan zoned 7.5 ha residential with potential housing for 120 units. It is now proposed to zone 12 ha with 240 housing units. This is proposed in an area with close proximity to Bray Head SAAO, a heritage building and where development will have a negative visual impact on Little Sugarloaf

The vehicular access for the development is to be via the main entrance to the estate. This access is unsuitable as it is located at the edge of a roundabout and distant from an efficient and frequent public transport service. It is not viable to have efficient public transport links to the Bray Gateway and Transportation Hub as the Vevay Road is operating at full capacity during peak hours

#### **Employment**

There are 2 sections of land zoned here under the Draft Plan for new employment. However there has been land zoned for employment in this area for decades which has not been utilised e.g. Dell and the area between Southern Cross Road and Boghall Road. Failure to utilise the current zoned land calls into question the necessity to rezone additional land for this purpose.

These proposed zonings and the constant urban expansion and sprawl of the town will detract from the cultural heritage and importance of Kilruddery and compromise the future of the area as a tourist attraction.

### **2 Change of Zoning for Demesne - Kilruddery Demesne Conservation and Tourism**

In the previous Plan only a small amount of land to the north of house was zoned for tourism with the large majority of the Demesne given "greenbelt" status. The role of the agricultural greenbelt is to retain the open and rural character of lands and provide an area of step down from the town development boundary.

*As stated in Manager's Report 2009/15 "proposals for development of the Tourist Zone should be relatively small scale to ensure the integrity of the Demesne is protected and retained"*

However, under the Draft Plan the entire Demesne has Tourism zoning, omitting any agricultural greenbelt zoning.

Under this proposed new zoning, the suggested uses listed in the 2017 Plan are “visitor/tourism attractions, TOURIST ACCOMMODATION/ Sporting/Recreational uses and events, recreational and community facilities”.

“Tourist Accommodation” is not defined. Does it include e.g. holiday chalets, holiday apartments, glamping ?

I believe that the area previously designated for Tourism zoning was sufficient to enable tourist related activities to be developed with affecting the integrity of the estate.

### **3. Specific Local Objective (SLO)**

Under the previous Plan Kilruddery had an “Action Area Plan” status. With such a status it was obligatory to submit a Masterplan against which all development would be evaluated for its effect on the integrity and conservation of the Estate.

However, no Masterplan is required under the SLO. Planning applications will be accepted piecemeal without the ability to assess them in the context of a Masterplan.

The requirement for a Masterplan would help ensure that any development would be part of a comprehensive, managed, integrated scheme.

In summary, the proposals for Kilruddery Demesne as outlined in the Draft Plan are inappropriate on the grounds of sustainability of our heritage attraction, traffic implications and visual impact in an area of outstanding beauty. The sustainability of the estate as a financially viable tourist attraction will be undermined by the continuing erosion of its assets.

I would suggest that any residential development be concentrated in areas which have good public transport links to avoid car dependency i.e. Bray Golf Club lands/ Ravensell/Harbour area .

### **Chapter 5 - Town/Neighbourhood Centres & Retail**

As stated in the Wicklow Development Plan 2016-2022 “the quality of shopfronts within Bray Main Street and surrounding side streets is relatively poor”.

The Previous Bray Town Development Plan 2011-2017 set out guidelines and general design principles to protect the essential character of the town. These were set out in Sections 12.4 Retail and Commercial Development, 12.5 Shopfronts, 12.7 Advertising and Signage.

The Draft Plan offers no such guidance, nor does the Wicklow County Development Plan 2016-2022.

Recent years have seen an increase in the number of inappropriate and shoddy shop fronts, shop signs and advertisement banners in the town. I believe that the retail areas of the town of Bray require greater attention in the Draft Plan. At the very least, the previous guidelines should be included. At best, areas of the town should be designated as Architectural Conservation Areas to ensure that what remains of the victorian heritage of the town is preserved to the greatest extent possible.

Anna Devenev. 27 Glendale Drive, Bray, A98 V6K5.

C85

**Lisa Rothwell**

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**From:** Anna Deveney |  
**Sent:** 04 September 2017 14:48  
**To:** Planning - Plan Review  
**Subject:** Submission Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** submission.pdf

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Recent years have seen an increase in the number of inappropriate and shoddy shop fronts, shop signs and advertisement banners in the town. I believe that the retail areas of the town of Bray require greater attention in the Draft Plan. At the very least, the previous guidelines should be included. At best, areas of the town should be designated as Architectural Conservation Areas to ensure that what remains of the victorian heritage of the town is preserved to the greatest extent possible.

Anna Deveney, 27 Glendale Drive, Bray, A98 V6K5.

**Leonora Earls**

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**From:** Barbara Moore  
**Sent:** 14 September 2017 20:42  
**To:** Planning - Plan Review  
**Cc:** Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Edward Timmins MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Miriam Murphy; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley  
**Subject:** Objection to proposed roadway and rezoning at Kilmacanogue

To Wicklow County Council,

I object to the proposed roadway and re-zoning of lands on the lower slopes of Little Sugar in Kilmacanogue on the following grounds:

- .. The proposal is contrary to the vision and goals as laid out in the Wicklow County Development Plan 2016-2022. This proposal would destroy what is deemed as an Area of Outstanding Natural Beauty (AONB).
- 2. In 2008 a ministerial order was made to grant a Special Amenity Area Order (SAAO) for the Great and Little Sugarloaf Mountains. This order was ignored and not implemented by Wicklow County Council. I request that an objective be included in the Bray Local Area Plan to create an SAAO for the Great and Little Sugarloaf Mountains.
- 3. The destruction of the green belt would ultimately lead to the subsuming of Kilmacanogue into the greater area of Bray. This I would be detrimental to the village distinction of Kilmacanogue. This is contrary to the vision and goals laid out in the WCDP.
- 4. The area proposed for re-zoning is an essential amenity, not just locally but the thousands of walking and trekking group visitors who use it throughout the year. This is again contrary to the vision and goals laid out in the WCDP.
- 5. The proposed roadway is superfluous to needs and It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible, and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.

I believe this proposal reflects an extraordinary lapse of judgement on the part of Wicklow County Council, and must be removed in its entirety from both the Wicklow County Development Plan 2016-2022, and the Bray/ Kilmacanogue Local Area Plan 2017-2023.

Sincerely,

Barbara Moore-Devine,

16 Rockfield Park,  
Kilmacanogue,  
Co. Wicklow

**Leonora Earls**

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**From:** David Devine ,  
**Sent:** 14 September 2017 20:38  
**To:** Planning - Plan Review  
**Cc:** Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchell@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:** Objection to proposed roadway and re-zoning, Little Sugarloaf, Kilmacanogue  
**Importance:** High

To Wicklow County Council,

I object to the proposed roadway and re-zoning of lands on the lower slopes of Little Sugar in Kilmacanogue on the following grounds:

- 1. The proposal is contrary to the vision and goals as laid out in the Wicklow County Development Plan 2016-2022. This proposal would destroy what is deemed as an Area of Outstanding Natural Beauty (AONB).
  - 2. In 2008 a ministerial order was made to grant a Special Amenity Area Order (SAAO) for the Great and Little Sugarloaf Mountains. This order was ignored and not implemented by Wicklow County Council. I request that an objective be included in the Bray Local Area Plan to create an SAAO for the Great and Little Sugarloaf Mountains.
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- I believe this proposal reflects an extraordinary lapse of judgement on the part of Wicklow County Council, and must be removed in its entirety from both the Wicklow County Development Plan 2016-2022, and the Bray/ Kilmacanogue Local Area Plan 2017-2023.

Yours sincerely,

David Devine,  
 Platinum Financial Planning,  
 Kilmacanogue,  
 Co. Wicklow.

**David P. Devine QFA RPA APA(PGI) MIIPM CWM™ CFP®**  
 Certified Financial Planner™ & Chartered Wealth Manager™  
**PLATINUM financial planning**

Mobile: \_\_\_\_\_  
 Web: \_\_\_\_\_  
 LinkedIn: \_\_\_\_\_

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Registered Business Address: Dublin Road, Kildare Town, Co. Kildare. Registered Number 495144.

\*\*\*\*\*

**Leonora Earls**

**From:** Adam Devlin [ ]  
**Sent:** 12 September 2017 09:27  
**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; ICullen@wicklowcoco.ie; 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. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Vincent Blake MCC; ICullen@wicklowcoco.ie; 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. Irene Winters MCC; Cllr. Sylvester Bourke MCC  
**Subject:** Objection to rezoning of fields in Killruddery

To whom it may concern,

I wish to object to the rezoning of a number of fields in Killruddery for residential housing and factories. There are enough fields and unoccupied land around Bray to accommodate these ventures. We bought our home in 2012 and the views of the sugarloaf played a part in us wanting to move there. At present the traffic on either ends and on the southern cross is horrendous, it can take us up to 6-7 minutes to turn left or right on to the road at any given time, the school run in the mornings can take up to 40 minutes to just get near the schools. With the extra traffic that would come with the housing/industrial estate would be catastrophic to the area. We have been made empty promises regarding retail shops etc. to be built on the southern cross and still we have to get in the car to go for a carton of milk, it is an absolute disgrace for the people living on the southern cross that we don't have a corner shop to get even the bare essentials, I do not see any logic in adding housing/industrial estate in the proposed location, the people that live on the southern cross should be looked after first with the proper amenities before the council try and do a quick fix to the housing crisis. The development would bring more hardship to those who suffer at the hands of flooding in the estates. It would be a disgrace to build on the Kilruddery estate land, this land should be protected from any such developments and I do not understand why the council have not taken steps to protect it.

We strongly oppose against any development.

Yours Sincerely,

Adam & Jennifer Devlin  
 72 Swanbrook  
 Southern cross rd.

**Leonora Earls**

---

**From:** Gabrielle Dillon [L]  
**Sent:** 14 September 2017 17:25  
**To:** Planning - Plan Review  
**Subject:** Proposed Development Plan for Bray  
**Attachments:** Objection letter.docx

Dear Sir/Madam,

Please see attached submission in relation to the above matter.

Kind regards

Gabrielle Dillon  
81 Hollybrook Park, Bray

planreview@wicklowcoco.ie

**Wicklow Council Council**

Planning Department

County Buildings

Wicklow Town

Co Wicklow

14 September 2017.

**RE: Bray Area Redevelopment Plan**

Dear Sir/Madam,

I am writing to you to object to the rezoning of areas of Kilruddery as proposed in the Bray Area Redevelopment Plan (specifically the Housing in Kilruddery – 12 Hectares with 240 housing units and the Industrial/Commercial use area i.e. large area behind Hollybrook/Swanbrook and a large area behind Deepdales). I have outlined my concerns below.

**Natural Amenity of the Sugarloaf**

It is widely recognised that Bray depends heavily on tourism and the service sector which brings income into the town. Much of this is based on the natural beauty of the seafront, the promenade, the views from Bray Head and the little Sugarloaf. A rezoning of one of the areas of real natural beauty by the County Council would in effect destroy the natural amenity that is the little Sugarloaf, particularly when there is no need to do so. There is a large emphasis in the Plan on the importance of preserving Bray's natural amenities on the one hand while the Plan on the other hand refers to building on one of the best amenities we have left which is unspoilt by development. Whilst such development may solve some short-term issues, the long-term consequences do not bear thinking about.

**Flooding issues**

The houses in the Southern Cross area, particularly those on the Kilruddery side, are built on the foothills of the mountains. Flooding in residents gardens has always been an issue– most of us have has problems with drainage in our gardens already over the years and have incurred much expense in trying to rectify the problem. A proposed plan of adding additional housing together with further Industrial units, will only increase the likelihood of serious flooding in our estate. We have a stream which is fed into an underground pipe and this already floods the ground when there is heavy rain.

**Traffic Problems & Congestion**



I travel on the Southern Cross Road on a daily basis and this road suffers from gridlock on a regular basis daily. Living in Hollybrook Park and trying to turn right for Bray to go to school, for entertainment purposes or to avail of what few shops there are can take for ever due to the constant stream of traffic. Numerous occasions I have sat at this junction for over 5 minutes trying to get out.

During the morning, most of the traffic is heading in the direction of the six schools located in the Vevay Road area, so the notion of adding nearly 240 houses, with a potential five hundred more cars to this gridlock, shows a complete lack of joined up thinking. The road does not even provide a safe cycling environment for children to cycle to school never mind for adults cycling to work.

It would appear from the current plan that road access to the new housing estates would be through Kilruddery but I understand that could change once the zoning is approved. If access is provided either via Kilruddery or Swanbrook/Earlscroft or any other access point on the Southern Cross would significantly add to the traffic issues this main road and likely safety issues.

I mention above car transport and cycling but also related to these issues is the absolute lack of public transport on the Southern Cross Road. The public transport that is available is a vastly reduced Finnegans bus service and express buses with the clear aim of taking residents out of the Bray area into the city centre. This service is a welcome addition however what about those residents who do not drive or are not capable of driving and want to travel into Bray. Clearly a focus should be on developing services to Bray with a view to developing the potential for residents to remain in the area and to spend their income in the environs of Bray. Again this clearly shows dysfunctional thinking in how the outskirts of Bray are linked (or not) to the town itself.

### **Infrastructure Issues**

I have lived in Hollybrook Park since the houses were originally built in 1998, almost 20 years ago. At the time, we were promised many amenities but the site across from our estate still remains undeveloped 20 years later. For those who don't drive or can't drive or who wish to support local businesses, there is not even a shop close by to get essentials. This adds to the traffic problems outlined above.

Under the new proposed development plan, more promises are being made for sports grounds, cycle paths and walkways etc. It strikes me that is merely an enticement to allow the plan to be adopted and that we will still be left in the same position without adequate services. Given that it has taken a full year to restart the roadworks on the Vevay road, I would expect that the budget of the Council will be very limited to provide badly needed resources.

### **Industry/Employment**

Clearly there is a need to create employment and space for businesses to develop. There are so many vacant buildings and units and areas between the Southern Cross and Boghall roads that surely these sites could be better utilised or be brought into use to provide housing/commercial units without destroying the little Sugarloaf and its environs.

These sites are already serviced and surely it would be more cost efficient to bring these areas into use. It is difficult to believe that the Dell site remains vacant for years and is rapidly becoming an eyesore.

**Unsocial behaviour**

Finally, unsocial behaviour and vandalism is already an issue in Hollybrook Park as young people pass through the estate and use the wooded area for drinking in etc. We have had to call the Gardai on numerous occasions to make their presence felt in the area. The current proposals will increase footfall through the estate of people with no connection to the area and increasing the potential for unsocial behaviour.

I would respectfully request the County Council and Planners to revise the draft Plan to ensure that the special amenity which is the Little Sugarloaf is protected from rezoning and from inappropriate and unwarranted and unrequired development. Let us not repeat mistakes of the past and deny future generations green areas and areas of natural beauty for the sake of unnecessary development.

Yours sincerely,

Gabrielle Dillon

Resident

81 Hollybrook Park

Bray

Co. Wicklow.

**Leonora Earls**

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**From:** Mary Dillon  
**Sent:** 05 September 2017 21:23  
**To:** Planning - Plan Review; Cllr. Joe Behan  
**Cc:** 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  
**Subject:** planning review rezone kilruddery

We wish to make our submission request for a rejection of the vote on rezoning of Kilruddery Estate as outlined in the Planning review.

As a family in Deepdales, we already put up with the noise and lights of the industrial estate to the rear of our property. As well as trucks and lights at late hours and early morning, we have the intermittent odours coming from the factories in which we have had to contact the EPA in the past.

Traffic at peak times on the Southern Cross can make leaving the estate a difficulty, and this would only add to this issue.

We continue to have poor transportation support with buses and shops, and yet they now consider adding 240 more family units to the area without the amenities required. While we hope our teens can begin to venture out on their own, their choice of routes home from the town centre are either to walk past an industrial estate or up the new slip road to the woodies round a-bout. This estate already feels cut off from the town and to expand the industrial zone will only add to the nuisance.

A new large industrial unit was fought against by Deepdales residents years ago and we lost. Therefore already the view from our cluster of houses at the bottom of Deepdales is now the large white industrial unit. The evergreens promised by the owner were never planted. The trucks and alarms from the factories are a never ending nuisance. And now you propose to have more building on the sugarloaf looking down into our properties.

We ask that you reject this poor proposal as a matter of urgency.

Mary and Paul Dillon  
39 Deepdales

## Leonora Earls

---

**From:** Mary Dillon  
**Sent:** 05 September 2017 21:16  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC  
**Subject:** rezoning kilruddery estate

We wish to make our submission request for a rejection of the vote on rezoning of Kilruddery Estate as outlined in the Planning review.

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Traffic at peak times on the Southern Cross can make leaving the estate a difficulty, and this would only add to this issue.

We continue to have poor transportation support with buses and shops, and yet they now consider adding 240 more family units to the area without the amenities required. While we hope our teens can begin to venture out on their own, their choice of routes home from the town centre are either to walk past an industrial estate or up the new slip road to the woodies round a-bout. This estate already feels cut off from the town and to expand the industrial zone will only add to the nuisance.

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I ask that you reject this poor proposal as a matter of urgency.

**Leonora Earls**

---

**From:** Rosemarie Walsh  
**Sent:** 12 September 2017 11:54  
**To:** Planning - Plan Review  
**Subject:** Draft Local Area Plan for Bray/Rezoning of part of Killruddery estate

FAO Administrative Officer

I would like to lodge an objection to the proposal to rezone part of the Killruddery Estate to residential so that at some stage 240 houses could be built.

I don't like the idea of such a beautiful amenity as the Little Sugarloaf being obscured by houses but, in my mind, this is the last item on my list of objections.

My over-riding concern is the increased risk of flooding that any such development would bring in its wake. I can't believe anyone would seriously consider building in such a risky place, given the problems already experienced by our neighbours in Swanbrook (I live in Hollybrook Park and the new houses would be very close to mine.)

I believe a sum in the region of €750,000 is owed to the council because of a lease agreement made 9 years ago regarding the development of infrastructure to serve the current houses on the Southern Cross - nothing has been built, no shops, nothing. I've lived in Irish towns with smaller populations which had supermarkets and banks (plural!!). There is no reason at all to believe such infrastructure would be built with the addition of 240 extra houses and industrial units.

The traffic is already chaotic in the area. It can take quite some time to even get on to the Southern Cross in the morning from Hollybrook Park. I have colleagues who need at least an hour to get from Greystones to Bray in the mornings because of the build-up of cars at the roundabout at the hotel.

When I bought my house, I thought (erroneously, as it turned out!) that there was some reliable public transport in the area. Currently, I am limited physically, a situation likely to get worse with time. If I have times when I can't drive, I don't want to have to get a taxi to buy milk!

I know houses must be built, though I think this should only happen when all empty houses are used. It's not a case of 'not in my back yard' - I just don't want MY back yard flooded!

Yours faithfully,  
**Rosemarie Diver**  
**153, Hollybrook Park,**  
**Southern Cross,**  
**Bray**

**Leonora Earls**

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**From:** tony [t  
**Sent:** 15 September 2017 15:07  
**To:** Planning - Plan Review  
**Cc:** tony  
**Subject:** BRAY MD LAP  
**Attachments:** LETTER.pdf; TWM Letter.pdf

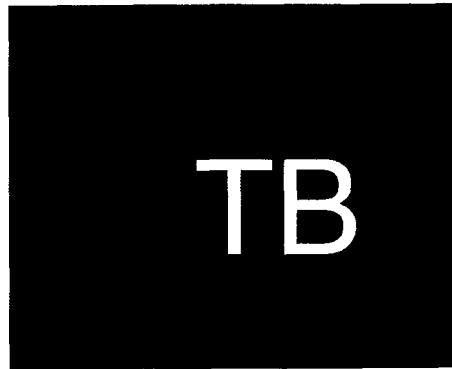
Please see attached submission in respect of the Draft Bray LAP.

There are two document. The TBP cover letter and an attachment to same; a letter prepared by TWM. Can you please confirm receipt by return email.

Tony Bamford  
TBP  
Planning and Development Consultants  
127 Lower Baggot Street  
Dublin 2

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**Job Number: 16198**  
**Letter Reference: 140917**  
**Date: 14 September 2017**



Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow

127 Lower Baggot Street  
Dublin 2  
T: 087 2903208  
E: [tony@tonybamfordplanning.ie](mailto:tony@tonybamfordplanning.ie)

**"BRAY MD LAP"**

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

Attachment: Letter from TWM Properties

Dear Sir/Madam

**Re: Submission to Draft Bray Municipal District Local Area Plan 2017-2023. Submission in relation to proposed planning policy in respect of the AO Smith Site.**

Tony Bamford Planning has been commissioned by DM Properties (30 Upper Abbeygate Street, Galway City) owners of the lands are the Boghall Road, known as the AO Smith site ("the subject site"). This brief submission is made in tandem and having regard to a separate submission made by LIDL Ireland GmbH (prepared by McCutcheon Halley).

DM Properties Ltd endorses the submission prepared by LIDL. However, it would be useful to expand on a number of the points arising in that submission.

**Delivering the Subject Site to Market**

The Members may or may not be aware of the history behind the protracted delivery of the former IDA site (AO Smith) and the challenges faced by our client in doing so. The attached letter from TWM, outlines the time and effort it has taken to release the site and deliver a position whereby the land can be used for purposes other than manufacturing.

TWM explain the problems, many legal, that had to be overcome before the subject site could be considered appropriate for other forms of development. One particular extract is noteworthy:

*"Title to the property, when acquired, was by way of lease from the IDA for a term of 999 years from 31 July 2002. This lease restricted the use of the property to "manufacturing and/ or internationally traded services and purposes ancillary thereto." When acquired the tenants use of the building was compatible with the IDA use. However, once the tenant vacated, finding an alternative tenant was not possible given the age of the building and the restrictive use. A development of the*

site with the IDA user clause was not viable and hence we entered into discussions on your behalf with the IDA to acquire their title and hence broaden the scope of the potential uses for the site.

Protracted negotiations with the IDA took place over the following 11 years with an acquisition finally completed in 2016. This was completed for a payment of close to half and million Euros with DM Properties also having to agree to allow the IDA to vacate two other properties which were held on long leases by the them. DM Properties have spent a considerable amount of time and money in endeavouring to simply put this site in a legal position where it is now relieved of historic encumbrances on the title. All this work had to be completed before any form of viable development could be envisaged. In addition, you have also incurred significant cost in holding the property whilst vacant in terms of interest payments, remedial maintenance, security etc".

This is a substantial investment by a private sector investor, with no direct assistance, financial or otherwise, from the public sector. A major, brownfield resource has been released, but the very policy position, the owner argued for in the current Bray Development Plan, that would provide a genuine prospect of kick-starting development and thus job creation, would be eroded in the Draft LAP.

#### **AO Smith - The Current Policy position**

The subject lands are currently zoned 'EMP1' "to provide for economic development and employment" and the entire A.O. Smith site is identified as 'Opportunity Site 7' in the BTDP, specifically for the following purposes: -

*"Predominantly employment use development. Industry/office/ and science and technology based uses in the main with the option of neighbourhood services /discount foodstore. The site is considered suitable for the location of taller buildings up to 5 storeys in height. Max Plot Ratio 1.5."*

The objective specifically allows for a Discount Foodstore, as well as other forms of employment creating activities: industry, office, science and technology.

The Lidl submission, cross references the planning application made by them, and the wider justification for that project is also reviewed. We of course endorse their submission.

The Member's must be under no illusion just how important the success of the LIDL application is to the 'pump-priming' of the rest of the site, including:

1. Delivering additional infrastructure (roads and underground services);
2. Creating Serviced sites; and,
3. Garnering interest from other sectors on the market, including office users etc.

#### **AO Smith – the Proposed Policy Position**

The Draft LAP proposes a land use zoning objective of 'E: Employment' for the entire 'AO Smith' site with an associated objective "to provide for the development of enterprise and employment". The description for this zoning designation is "to facilitate the further



development and improvement of existing employment areas and to facilitate opportunities for the development of new high-quality employment and enterprise developments in a good quality physical environment.

Typical appropriate uses for employment zoned lands include:

*"general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations and ancillary developments for employment and industry uses in accordance with the WCDP".*

The proposed zoning removes the 'opportunity site' status' afforded to the site and the option of neighbourhood services/supermarket under the current Development Plan. Our Client, considers that these proposed changes would obstruct the redevelopment of A.O. Smith site.

It is our opinion, in order to give the subject site the best prospect of realising development, having regard to what we know about demand for various landuses in Bray, the current objective for the site should be reinstated, both in terms of its opportunity status and objective for a discount store/supermarket.

*Predominantly employment use development. Industry/office/ and science and technology based uses in the main with the option of neighbourhood services /discount foodstore/supermarket. The site is considered suitable for the location of taller buildings up to 5 storeys in height*

The Local Area Plan must be consistent with the Development Plan which is the 2016-2022 Wicklow County Plan. It seeks to:

- EMP 7 - to encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the County and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.
- EMP 9 – to promote and support the enhancement of the built, natural and social environment to attract and sustain employment creation initiatives.
- EMP 10 – to facilitate the provision of a mix of ancillary services such as a shop or food outlet, creche etc. on large sites zoned for employment at peripheral locations where a detailed justification/need for such facilities has been demonstrated and where it has been demonstrated that the provision of such facilities does not impact on existing facilities, in particular, town centre or local neighbourhood centre activities.

It is our client's position, bearing in mind all the evidence in front of the Planning Authority, including the history of the site both in terms of planning and commercial factors, that the erosion of the site's policy position will result in a failure to deliver these objectives. We go further: there is no alternative, opportunity for the site in the foreseeable future.

### **Retail Warehousing**

Under the current Plan Retail Warehousing is a use that is open to consideration. The draft LAP provides for a looser overview of acceptable landuses at page 72:

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

A modest proportion of Retail Warehousing has long been part of the plans for the subject site and forms one of the few genuine, short term, employment generating uses that could be delivered in the short term. It also forms part of the masterplan lodged with the LIDL application.

To this end would request that the wording of the above paragraph is revised as follows:

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

#### **Concluding Comments**

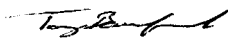
The Council's role, in terms of land use planning, mandated by its own County Development Plan, is to promote the subject site and others for economically, beneficial, development. The Council, through the Development Plan and Local Area Plan cannot directly create employment, but it can build a framework, which is reasonable, realistic and deliverable. Policy and objectives which on their face seek to be proactive, but cannot deliver, are worthless.

We would therefore ask the Planning Authority and appeal directly to the Members to retain a flexible policy framework for the subject site, in line with the current Bray DP and County DP.

Our client will be happy to engage in discussions with the Members in relation to this matter.

I trust this is in order.

Yours faithfully



**Tony Bamford**

PLANNING APPLICATIONS

LOCAL AREA PLANS

EXEMPT DEVELOPMENT

PORTFOLIO MANAGEMENT COMMUNITY

ENVIRONMENTAL IMPACT



Mr. Gillen  
DM Properties  
36 Upper Abbeygate Street  
Galway  
FAO Maurice Gillen

4th September 2017

**Re: Former AO Smith Site, Boghall Road, Bray, Co. Wicklow**

Dear Mr Gillen,

I refer to our recent conversation in which you have advised me of the proposed plans by the Council to remove the objective for a Discount Store on the AO Smith site in Bray, as part of the Draft Bray Local Area Plan. As your Property Advisor, and having worked with you on bringing this site forward for redevelopment over the past 15 years, I am gravely concerned about the consequences for the future viability of the entire site if this change is implemented. I would be of the view that it is prejudicial to the current application by Lidl Ireland. I think it would be beneficial for the Council to better understand the protracted history of this land so they have the full facts of the incredible effort it has taken to release the site from the restrictions placed on its use by the IDA.

As discussed, the property was originally acquired for just under €5m from the IDA in 2002 as an investment property with a lease in place to AO Smith. In 2005 the tenant vacated the property.

Title to the property, when acquired, was by way of lease from the IDA for a term of 999 years from 31<sup>st</sup> July 2002. This lease restricted the use of the property to "manufacturing and/ or internationally traded services and purposes ancillary thereto." When acquired the tenants use of the building was compatible with the IDA use. However, once the tenant vacated, finding an alternative tenant was not possible given the age of the building and the restrictive use. A development of the site with the IDA user clause was not viable and hence we entered into discussions on your behalf with the IDA to acquire their title and hence broaden the scope of the potential uses for the site.

Protracted negotiations with the IDA took place over the following 11 years with an acquisition finally completed in 2016. This was completed for a payment of close to half and million Euros with DM Properties also having to agree to allow the IDA to vacate two other properties which were held on long leases by the them. DM Properties have spent a considerable amount of time and money in endeavouring to simply put this site in a legal position where it is now relieved of historic encumbrances on the title. All this work had to be completed before any form of viable development could be envisaged. In addition, you have also incurred significant cost in holding the property whilst vacant in terms of interest payments, remedial maintenance, security etc.

During your ownership, you obtained a change of zoning in order to endeavour to make the development of the site feasible. The new zoning and an overarching specific objective allowed for a Discount Food store. As part of that review process the critical nature of such an objective to the financial viability was made clear to the council.

The reasons were and continue to be relevant today:



- (i) the price that a discount food user would pay for a site in this location would be far above the price obtainable from any other use. These monies could be used to construct the necessary access and infrastructure in order to open up the site for development
- (ii) The existence of a food use on the site and the upfront infrastructural commitment would attract other uses as it would give comfort to potential occupiers that the site would be built out quickly.

Modern day occupiers require modern day developments and the associated facilities that are part and parcel of such developments. This includes landscaping, an attractive environment and facilities on site. These need to be front ended and as such requires significant up front cost. In assessing the viability of this site, having regard to the costs invested thus far, it is essential for the Discount Food use to remain. If it is removed it is likely that DM Properties will have to leave the site as is until there is a significant increase in demand, rents and prices for the allowed uses in this location. This was evidenced previously during the Celtic Tiger era when no such demand emerged. The potential supply of competing accommodation in other locations such as Sandyford and Cherrywood is likely to mean that it will be some time before you could take the risk in investing further and opening up the subject site. As you know, at present, raising bank debt to facilitate these initial works is very difficult to obtain. The risk would be far too great. A sale of a portion of the site for a discount food use will hedge this risk and ensure the site is developed.

The development of this high profile site has been delayed for many years because of use restrictions. The relaxation of some restrictions has enabled you to bring forward concrete development proposals. Another use restriction at this stage will once again no doubt delay development indefinitely.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sean O'Neill', with a stylized flourish at the end.

Sean O'Neill M.Sc. B.Sc.(Surv.) ARICS, MSCSI, Dip Arb.

Director

TWM

T: + 353 (0) 1 676 6566

E: [sean@twmproperty.ie](mailto:sean@twmproperty.ie)

**Leonora Earls**

---

**From:** Muriel Doherty [mailto:muriel.doherty@bray.ie]  
**Sent:** 13 September 2017 21:30  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan

Dear Sir/Madam

I would like to object to the above plan on the following points:

- \* The building of approx. 240 residential plus industrial units in an area that has been developed residentially over the last 20 years, with no amenities other than Shoreline Leisure Centre is far too much. There is no local shopping and limited public transport. Previous plans for amenities have not materialised.
- \* Flooding is an issue for many homes on the Southern Cross Road. The building of these units could further impact on this as natural drainage will be effected.
- \* There are three sites close by, on the Boghall Road which are vacant and could be rezoned for residential use. This would use space that is 1. Idle and 2. Have residents nearer the town and shops and more frequent public transport. The 3 sites are 1. Dell  
2. Schering Plough  
3. A O Smith

The green belt near Gilspur Lane Reservoir must be maintained. Development on or above this height would have significant disturbance to Deepdales residents. Rezoning an area of natural beauty is wrong.

\* The Southern Cross Road is the main road into Bray and Greystones and already has major traffic problems. Building this amount of residential and industrial units will make a bad situation worse. The area is poorly maintained by the council. This proposed development is to be accessed from the Southern Cross Road. It will do nothing to improve the area.

\* The Kilruddery Estate is a beautiful "naturally green" tourist/ local attraction. A home to much wildlife. This development would have a detrimental effect on both.

I trust you will take on board these points and hopefully a revised plan will be drawn up.

Yours sincerely

Muriel Doherty  
114 Deepdales.

Sent from Yahoo Mail on Android

C96

John Donnelly  
Kilmurray  
Quill Road  
Kilmacanogue  
Co. Wicklow



7<sup>th</sup> September 2017

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

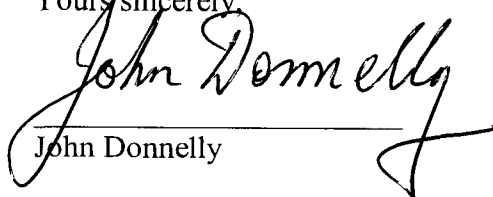
**Re: Submission to the Bray Municipal District Local Area Plan (2017-2023)**

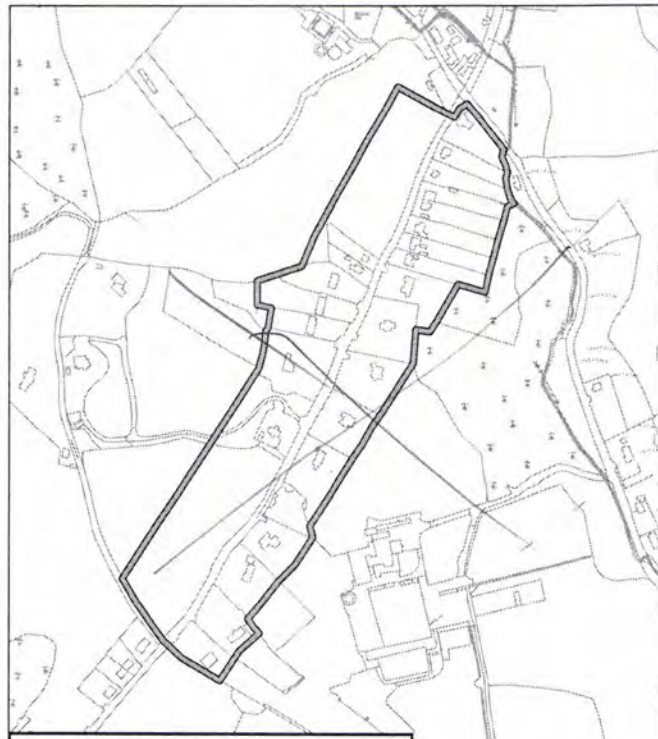
A Chara,

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

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

Yours sincerely,

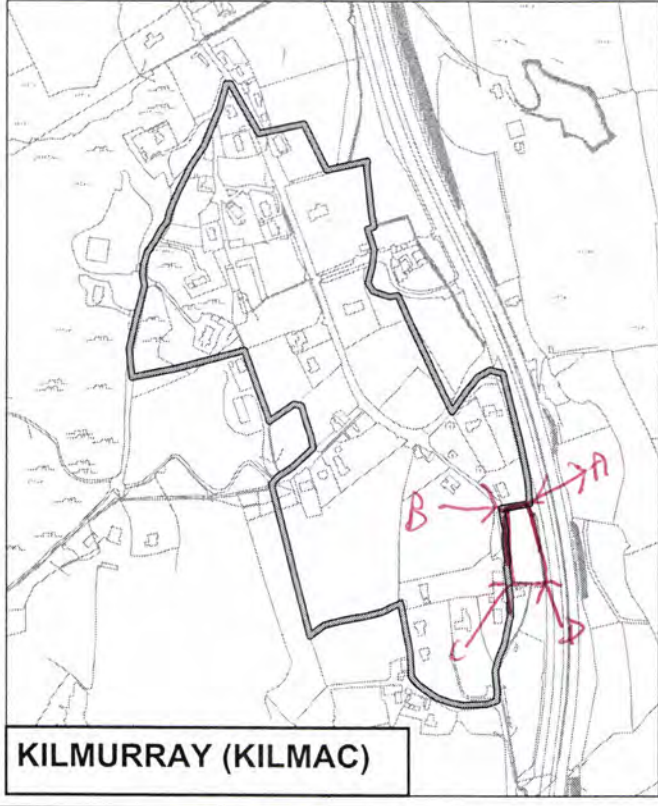
  
John Donnelly



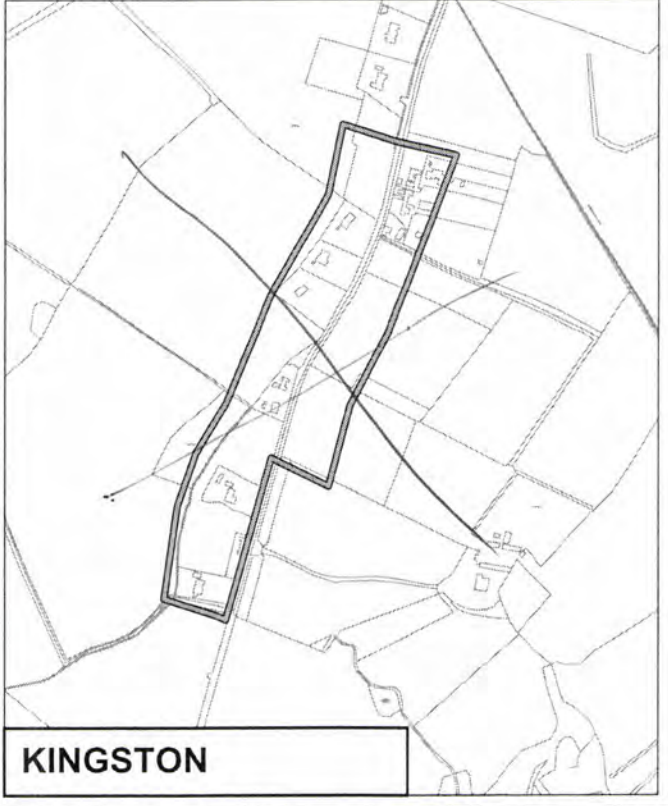
**KILLISKEY**



**KILMURRAY (NTMK)**



**KILMURRAY (KILMAC)**



**KINGSTON**

**Settlement Boundaries  
Rural Clusters**

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Maps Not To Scale

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2015/35/CCMA/Wicklow County Council

**Leonora Earls**

---

**From:** David Doody [mailto:doodyd@dundalk.com]  
**Sent:** 02 September 2017 19:12  
**To:** Planning - Plan Review  
**Subject:** Draft LAP Submission

Hi,

As a property owner in Hollybrook Park, Bray, I am against the proposed rezoning of land in Killruddery Demesne on the little Sugarloaf. I feel this zoning is unwise for the following reasons:

- The proposed development is too large and too far from the Southern Cross.
- The proposal is to route traffic to the new residential area using the existing roads in Killruddery - this will result in substantial traffic along these roads which will damage the amenity value of Killruddery itself
- The rezoning will also result in a substantial increase in traffic on the Southern Cross which is already overloaded at peak. It will also put extra strain on public transport in this area.
- The plan to route pedestrian traffic through Hollybrook Park
- The location of the Special Employment zone seems very strange, sited as it is between two residential areas, and far from the main road itself. This element of the zoning will damage the quality of both residential areas.
- All of this land is on an elevated site - once developed, it will damage the view of the Little Sugarloaf from much of the Southern Cross
- There is already undeveloped land directly on the Southern Cross itself, which is far more suitable for development than the lands proposed.

Many thanks,

David Doody



C96.

18 Riddlesford  
Southern Cross Rd.  
Bray;  
Co. Wicklow  
5<sup>th</sup> Sept 2014

WICKLOW COUNTY COUNCIL  
11 SEP 2017  
Corporate Affairs

WICKLOW COUNTY COUNCIL  
11 SEP 2017  
PLANNING DEPT.

I wish to submit my ~~obj~~  
objection to the Bray Municipal  
District Plan (LAP) for a  
proposal to rezone land on  
the Kildrudey Estate from Green  
Belt to residential zoning on  
a slope of small Sugar loaf and  
also New Industrial zoning.  
Southern Cross Road has had a large  
increase in traffic over the past 10 yrs  
at present it is very difficult for cars  
to access Southern Cross Rd in early  
morning and late afternoon. This  
rezoning will effect residents in this  
estate going and returning from work  
Yours

Eileen Doran

**Leonora Earls**

---

**From:** Fergal Dowling [mailto:fergal.dowling@braycouncil.ie]  
**Sent:** 14 September 2017 14:15  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017

Dear Sirs

I refer to the proposed re-zoning set out in the above mentioned plan for the Bray area. We wish to lodge an objection to the plan, specifically in relation to the proposed re-zoning of lands in the Killruddery Estate for housing and industrial use. The area is currently under severe pressure with volumes of traffic at various points in the day causing significant congestion on the Southern Cross Road and environs and the addition of more houses and industrial units will only add to this current problem. The area is currently poorly serviced with public transport and infrastructure such as shops so additional traffic is inevitable.

We are also concerned that the proposed building works and changes to the land could lead to flooding in our area, with the possible diversion of natural water flow from the mountain towards the Hollybrook Park Estate. A number of our neighbours in parts of the estate are already affected by this in wintertime so we are concerned at the potential for this to be increased with more buildings being put into the Killruddery lands.

There appears to be a walkway proposed through Hollybrook Park in the plan. We are concerned that this could add to the existing problem of anti-social drinking in the woods next to Hollybrook Park that exists today, with the potential to attract further numbers of unwanted anti-social behaviour.

We are also concerned at the impact that this proposal will have to this area of outstanding natural beauty, which has long been enjoyed by the people of Bray. Putting houses and industrial units on this land will destroy the walks and views enjoyed by people as well as displace many of the animals and impact on the flora and fauna in the Killruddery Estate today.

We would be grateful if you could bring our concerns to the attention of Councillors when this matter comes up for discussion in Wicklow Co. Council in due course

Yours sincerely  
Fergal and Laura Dowling  
42 Hollybrook Park  
Southern Cross Road  
Bray  
Co. Wicklow

C98

**Leonora Earls**

---

**From:** Malcolm Dowling [mailto:malcolm.dowling@bray.ie]  
**Sent:** 14 September 2017 20:28  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** Bray Town Plan Proposed Zoning Objection.pdf

Dear Sir/Madam,

Please find attached submission in relation to Draft Local Area Plan for Bray Municipal District.

I am objecting to the proposed rezoning of lands at Oldcourt adjacent to Giltspur Wood which I do not believe to be in the interests of proper planning, sustainable development or the common good. I request that full consideration be given to this submission.

Please acknowledge this submission.

Regards,

Malcolm Dowling

Sent from [Mail](#) for Windows 10

**Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Rd,  
Wicklow Town**

**Malcolm Dowling  
69 Giltspur Wood,  
Bray,  
County Wicklow**

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

**Re: Bray MD LAP**

**Dear Sir/Madam,**

I am writing this letter on behalf of my family, resident at the above address, to make known our objection to the proposed rezoning of land, adjacent to Oldcourt House and Giltspur Wood, as R20 'New Residential'. The rezoning of this land is outlined in the Draft Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017).

Whilst acknowledging the need to provide land for new private, social and affordable housing in Bray, I do not believe that the proposed location is a suitable location for such development.

The zoning of this land for residential development is not in the interest of proper planning, sustainable development or the common good and is contrary to a number of stated policy positions referred to in the existing Plan.

In particular, current Council policy (Section 8.4.4.1 of the Plan) rightly seeks to preserve and protect important natural wildlife habitats. Although the area is not extensive, the Swan River Valley at this location forms an important local habitat and wildlife corridor which allows wildlife to preserve and flourish. Native species including red squirrel and various bat species are known to inhabit the lands in question. Fragmentation of this habitat through residential development will have a serious detrimental impact on one of the last remaining natural green belts in the town.

Our understanding is that it is Council policy to protect trees that provide natural habitat within the River Valley and that natural woodland at this location is subject to a Tree Preservation Order (TPO No. 5& No. 10, Table 8.2, Bray Development Plan 2011 – 2017). Protection of trees, hedgerow and woodland at this location whilst providing essential habitat to wildlife also assists in flood mitigation and in preventing soil erosion.

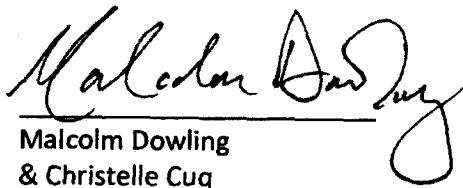
The proposed re-zoning contravenes a number of existing policy objectives within the current Plan. Aside from this, we have other pressing concerns should development proceed at this particular location.

It is probable that access to the proposed development land would be through the existing Giltspur Wood estate, an established neighbourhood that is home to a large number of young children. In particular, the green area within the estate provides what is essentially a popular, child friendly playground for the younger generation. Access to the proposed residential development would likely be in contact with this area and would present an unacceptable traffic risk. This would persist through the construction period and beyond and would seriously damage the existing amenity value of the green as a safe place to play within Giltspur Wood.

The destruction of natural habitat at this location and the imposition of serious health and safety risks to the neighbouring residents of Giltspur Wood should not be contemplated in this instance to facilitate the construction of only a small number of houses. If anything, the protection afforded in the current Plan should be maintained and enhanced in the upcoming Plan to protect human health and optimise the biodiversity of our natural habitats.

I therefore ask that you consider this objection to the proposed rezoning of this land at Oldcourt.

Yours sincerely,

  
Malcolm Dowling  
& Christelle Cuq

**Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Rd,  
Wicklow Town**

**Malcolm Dowling  
69 Giltspur Wood,  
Bray,  
County Wicklow**

12<sup>th</sup> September 2017

Re: Bray MD LAP

WICKLOW COUNTY COUNCIL

15 SEP 2017

PLANNING DEPT.

Dear Sir/Madam,

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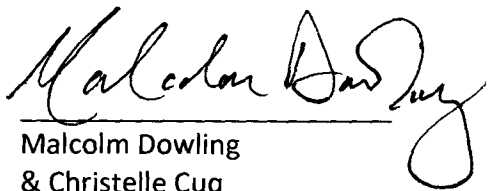
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I therefore ask that you consider this objection to the proposed rezoning of this land at Oldcourt.

Yours sincerely,

  
Malcolm Dowling  
& Christelle Cuq

**Leonora Earls**

---

**From:** Anne Downes [  
**Sent:** 13 September 2017 12:14  
**To:** Planning - Plan Review  
**Cc:** Planning - Admin; Cllr. Joe Behan; Conor Doyle; cllrmichaeloconnor@gmail.com; Cllr. Christopher Fox MCC; stevinsgreenbray@gmail.com; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tommy Annesley; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; patkennedy1@outlook.ie; marymcconaldsinnfein@gmail.com; Cllr. Miriam Murphy; tomfortune49@gmail.com; Cllr. Nicola Lawless; cllrgrainnemclaughlin@gmail.com; mitchelld@eircom.net; gerrywalsh00@gmail.com; Gail Dunne; Cllr. Mary Kavanagh; Cllr. Shay Cullen; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC  
**Subject:** Planning proposed for Southern Cross Road area in Bray

A Chara

I am writing to you about the proposed plan to build 240 houses and also Commercial / Business Units and Employment Units on Kilruddery lands.

My objections are as follows:

- There is already flooding at houses in Hollybrook Park that back on to Kilruddery Estate. It would be disastrous to build behind these houses and would cause extra flooding
- This is a beautiful scenic area enjoyed by all and building on the side of Little Sugarloaf would be an eyesore
- Kilruddery Estate is a beautiful green area and enjoyed by thousands every year. The concerts and activities organised there bring huge amounts of traffic which have to be managed by gardai
- There is such a build up of traffic on the Southern Cross Road that it can take 5/7 minutes for cars to get out of Hollybrook Park. This is not only at peak times but throughout the day, 7 days a week
- There are no facilities in terms of shops in the area and limited transport and insufficient pedestrian crossings.

I hope you will reconsider continuing with this disastrous plan for this area.

Kind Regards

Anne Downes



**Leonora Earls**

---

**From:** colette doyle [ |  
**Sent:** 12 September 2017 20:34  
**To:** Planning - Plan Review  
**Subject:** Bray Local Area Plan Objection

To: Wicklow County Council Planning Department

12 September, 2017

Martin and Colette Doyle, 97 Hollybrook Park, Southern Cross, Bray, Co. Wicklow.

We would like to outline our objections to the proposed development and rezoning of part of the Killruddery Estate on the Little Sugarloaf for housing and commercial use.

Our main objections are:

1. Flooding, any break in the existing boundary wall for access to the proposed new development with Killruddery would allow excess water during heavy rainfall coming from the little Sugarloaf to pass through and possibly cause flooding to existing houses in estates. Where now during heavy rainfall it flows down and rises behind the line of the wall accumulating at the Swan River where it passes without difficulty through the existing culvert. We have footage of this occurrence which we filmed ourselves.
  2. No local infrastructure, we have lived in Hollybrook Park for almost twenty years now, during his time there has been no investment in local infrastructure in the form of local shops, amenities or public transport. The lack of such investment while proposing to increase the number of houses can only lead to further dis-improvement of the area as a place to live.
  3. Public Transport is to say the least dismal consisting of a skeleton bus service a few 84x buses in the morning and evening Monday to Friday only, which come through mostly full from Greystones areas we have experienced this on many occasions unable to get a bus into the city in time.
  4. Commercial Use, Industry /Noise Pollution, the siting of more industrial premises close to residential areas is also a problem not least of which is Noise pollution from 24hour operators as we have experienced ourselves here when a motor went on a machine in Takeda and we had a constant noise 24 hours a day for a week or more until it was fixed.
  5. Access dangerous at Hollybrook, we would be opposed to Pedestrian Access through Hollybrook as the road is already too narrow in the estate it would also lead to parking problems which already exist. The entrance to Hollybrook is dangerous already with the entrance so close to houses in the estate and the Southern Cross when entering and leaving. In addition to this currently some bus users leave their cars parked at the entrance all day long which we have seen. There is already an access road at the Woodies roundabout to Killruddery which would be more suitable.
  6. Bad Traffic management on the Southern Cross already militates against residents in that the volume of traffic coming from the Greystones area in the morning and returning in the evening makes it very dangerous to get in and out of the estate. The Garda get numerous complaints of speeding and overtaking and do their best to control this. The obvious solution would be to put more roundabouts at each estate entrance to stop the speeding and overtaking problem. This would also allow drivers to leave the estate safely.
- Yours Sincerely, Martin and Colette Doyle.



# THE PADRAIG SMITH PARTNERSHIP

ARCHITECTS PLANNERS DESIGNERS CONSERVATIONISTS

PROJECT MANAGEMENT CONSULTANTS

The Red House,  
Market Square,  
Wicklow,  
Ireland.  
Phone: 0404-69478  
Fax: 0404-66584  
E-mail: [psp@psp.ie](mailto:psp@psp.ie)



C101

15<sup>TH</sup> SEPTEMBER 2017

SENIOR EXECUTIVE OFFICER,  
PLANNING DEPARTMENT,  
WICKLOW COUNTY COUNCIL,  
COUNTY BUILDINGS,  
STATION ROAD,  
WICKLOW TOWN,  
CO. WICKLOW

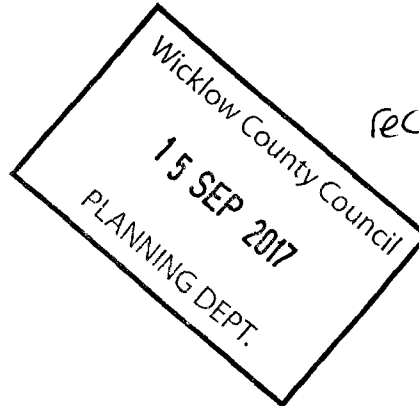
RE: SUBMISSION IN RELATION TO DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN –  
LANDS AT KILMACANOGUE, BRAY, CO. WICKLOW

DEAR SIR,

ON BEHALF OF OUR CLIENT, MR. DENIS DOYLE. PLEASE FIND ENCLOSED SUBMISSION IN SEEKING  
AMENDMENT TO THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN IN RESPECT OF LANDS AT  
KILMACANOGUE, BRAY, CO. WICKLOW

YOURS SINCERELY,

PP  
PADRAIG SMITH.  
THE PADRAIG SMITH PARTNERSHIP



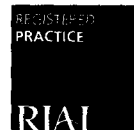
reception 3.50pm .

ENC: SUBMISSION DOCUMENT

CC: MR. DENIS DOYLE

PRINCIPAL: Padraig Smith, B.Arch.Sc., Dip.Arch., F.R.I.A.I.

THE PADRAIG SMITH PARTNERSHIP LTD.  
T/A THE PADRAIG SMITH PARTNERSHIP



# THE PADRAIG SMITH PARTNERSHIP

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The Red House,  
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Phone: 0404-69478

Fax: 0404-66584

E-mail: [psp@psp.ie](mailto:psp@psp.ie)



## DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2016-2022

### SUBMISSION AND REPRESENTATION TO WICKLOW COUNTY COUNCIL

**ON BEHALF OF  
MR. DENIS DOYLE**

SUBMITTED TO:

SENIOR EXECUTIVE OFFICER,  
PLANNING DEPARTMENT,  
WICKLOW COUNTY COUNCIL,  
COUNTY BUILDINGS,  
STATION ROAD,  
WICKLOW TOWN,  
CO. WICKLOW

SEPTEMBER 2017

PRINCIPAL: Padraig Smith, B.Arch.Sc., Dip.Arch., F.R.I.A.I.

THE PADRAIG SMITH PARTNERSHIP LTD.  
T/A THE PADRAIG SMITH PARTNERSHIP

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PRACTICE

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ARCHITECT  
ACCREDITED IN  
CONSERVATION

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RIAL

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PSDP  
ACCREDITATION

RIAL ✓

## DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN: 2016-2022

RE : ZONING VARIATION, TO LANDS AT KILMACANOGUE, BRAY, CO. WICKLOW

ON BEHALF OF : MR. DENIS DOYLE

---

### SUBMISSION AND REPRESENTATION TO WICKLOW COUNTY COUNCIL

---

#### 1.0 INTRODUCTION

THE LOCAL AUTHORITY IS INVITED TO HAVE REGARD TO THIS SUBMISSION AND CONSIDER INCLUDING THE AMENDMENT SOUGHT IN THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN.

INCLUDED WITH THIS SUBMISSION IS: -

- 1] O.S MAP SHOWING THE EXTENT OF LAND IN CONTROL OF THE APPLICANT, MR. DENIS DOYLE
- 2] EXTRACT OF DRAFT LAND USE ZONING MAP - KILMACANOGUE - MAP 4 – LAND USE ZONING OBJECTIVES
- 3] EXTRACT OF DRAFT LAND USE ZONING MAP - KILMACANOGUE - MAP 4 – LAND USE ZONING OBJECTIVES WITH PROPOSED AMENDMENT NOTED

#### 2.0 AMENDMENT SOUGHT

THE PURPOSE OF THIS SUBMISSION IS TO SEEK AN AMENDMENT TO THE DRAFT BRAY MUNICIPAL LOCAL AREA PLAN 2016-2022 AS FOLLOWS:-

EXTEND THE AREA ZONED TERTIARY DEVELOPMENT TO INCLUDE 2NO. SMALL PARCELS OF LAND TO THE SOUTH EAST WEST AND NORTH EAST OF EXISTING ZONED LANDS IN THE APPLICANTS CONTROL AND ZONE SAME TERTIARY DEVELOPMENT (AS IDENTIFIED ON ATTACHED DRAWING –PP/03-05)

#### 3.0 PLANNING AND SUSTAINABLE DEVELOPMENT - BASIS FOR THE AMENDMENT SOUGHT

THE PLANNING AND SUSTAINABLE DEVELOPMENT BASIS FOR THE AMENDMENT SOUGHT IS AS FOLLOWS:

- EXISTING VEHICULAR ACCESS ROAD AVAILABLE TO SAID LANDS.
- LAND CAN BE READILY SERVICED BY EXISTING UTILITIES/SERVICES AVAILABLE.
- THIS “BOOKENDS” DEVELOPMENT AS THERE IS ONLY AGRICULTURAL LAND TO THE SOUTH OF THE PROPOSED ZONED LAND.

THE PROPOSED AMENDMENT IS SOUGHT TO EXTEND AREA OF LAND IN THE APPLICANTS CONTROL. THIS PROPOSED MINOR AMENDMENT WOULD CONSOLIDATE THE EXISTING PATTERN OF DEVELOPMENT IN THE AREA.

#### 4.0 SUMMARY/CONCLUSION

THE ABOVE AMENDMENTS ARE SOUGHT TO THE DRAFT PLAN AS PUBLISHED

THE INCLUSION OF THE AMENDMENTS SOUGHT WOULD BE IN LINE WITH THE PROPER PLANNING AND DEVELOPMENT OF THE AREA.

SIGNED PP.....  
  
PADRAIG SMITH.  
THE PADRAIG SMITH PARTNERSHIP LTD

SEPTEMBER 2017

PRINCIPAL: Padraig Smith, B.Arch.Sc., Dip.Arch., F.R.I.A.I.

THE PADRAIG SMITH PARTNERSHIP LTD.  
T/A THE PADRAIG SMITH PARTNERSHIP





WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District  
Local Area Plan  
2017**

LAND USE ZONING MAP **DRAFT**

Title: Kilmacanogue  
Map No. : 4



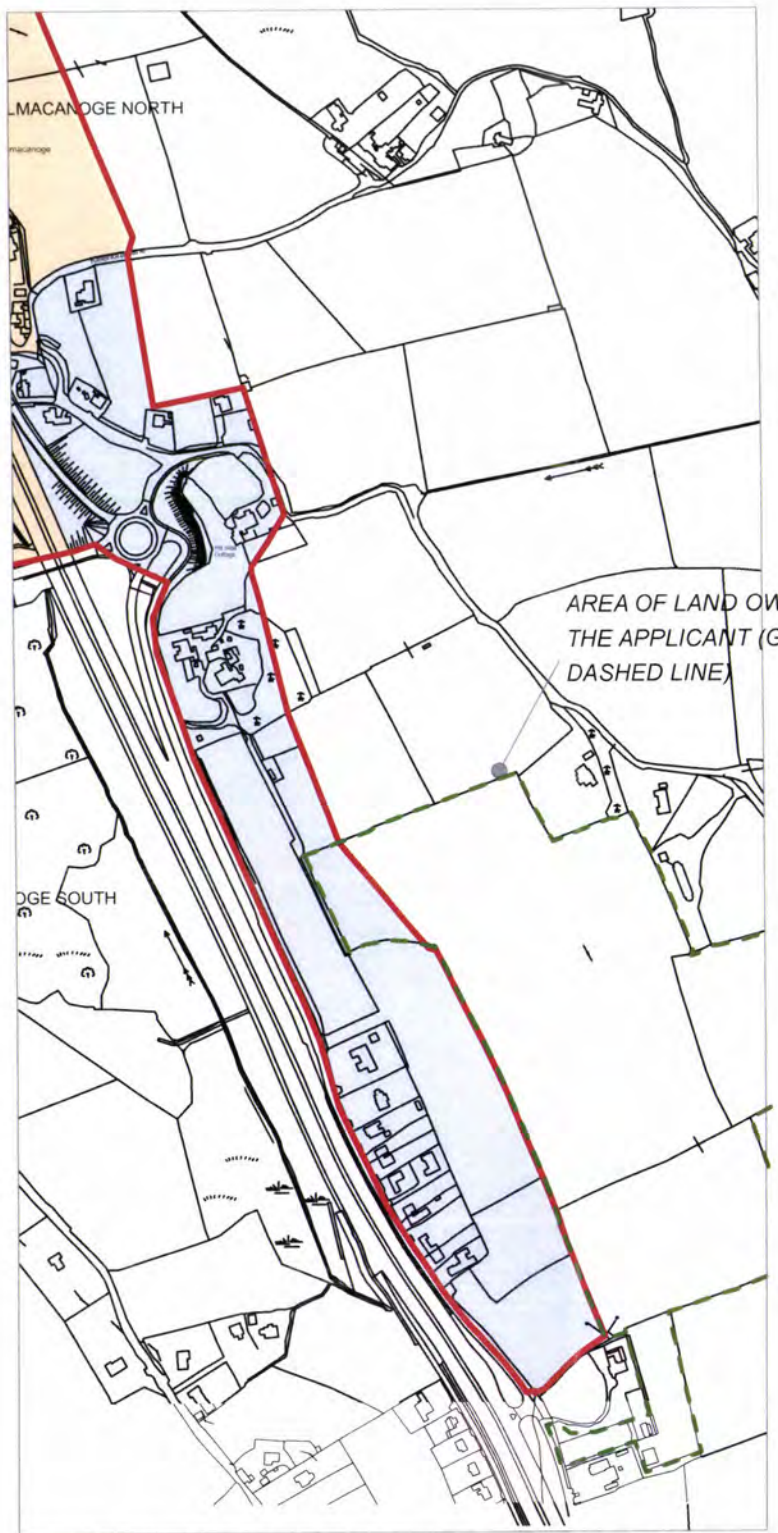
LEGEND

- Municipal District Boundary
- Settlement Boundary
- Primary Development Area
- Secondary Development Area
- Tertiary Development Area
- Plan Objectives Boundary

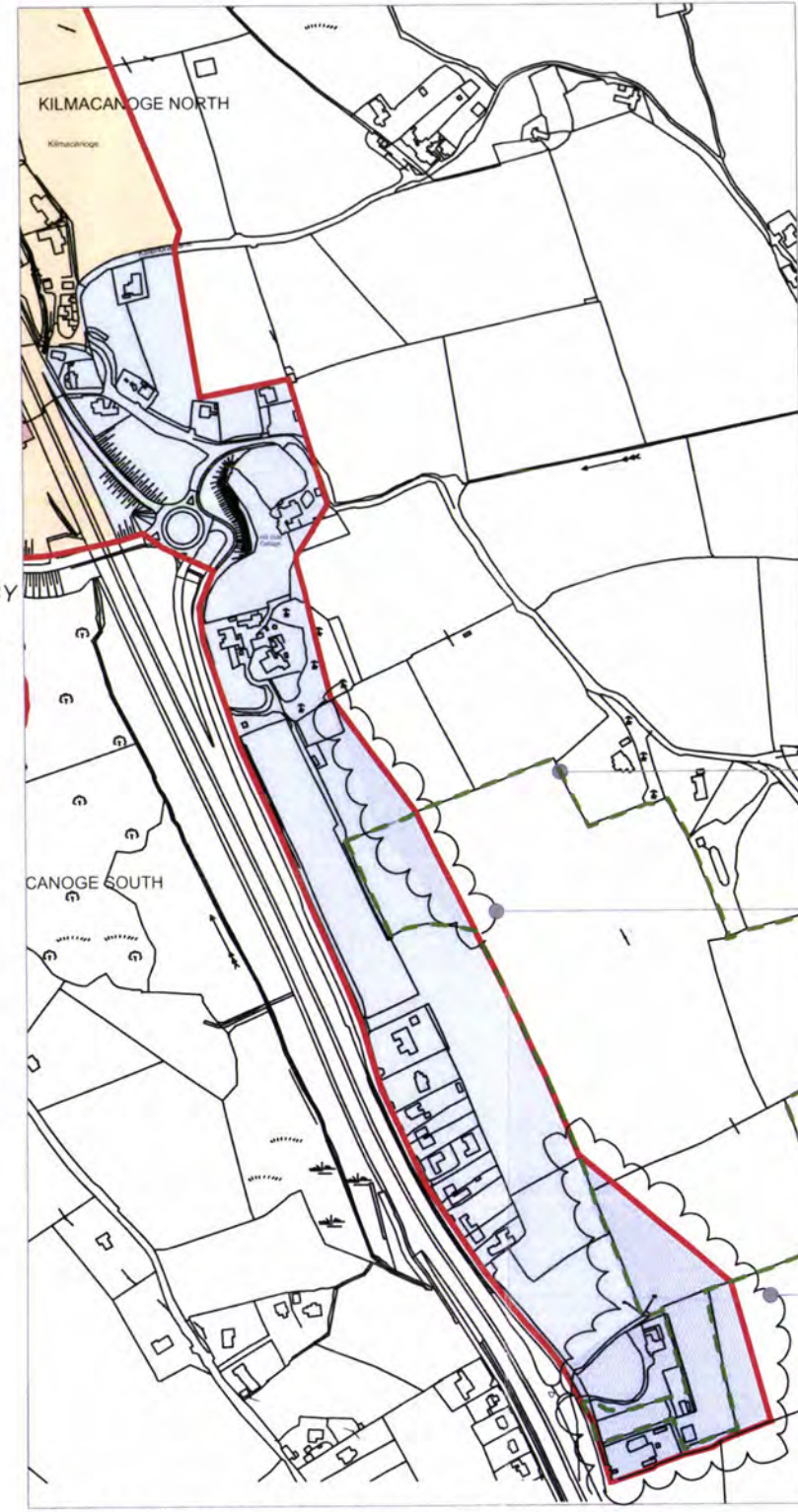
--- AREA OF LAND OWNED BY THE APPLICANT



OS MAP EXTRACT ( XY COORDINATES (725640 mE, 714440 mN) (725100mE, 713660mN) SHOWING EXTENT OF LANDS IN APPLICANTS CONTROL OUTLINED IN GREEN DASHED LINE (OS LICENCE No. AR0015917)



EXTRACT - BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 - WICKLOW COUNTY DEVELOPMENT PLAN 2016 - 2022, SHOWING EXTENT OF LANDS IN APPLICANTS CONTROL OUTLINED IN GREEN DASHED LINE



EXTRACT - PROPOSED AMENDMENT TO BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 - WICKLOW COUNTY DEVELOPMENT PLAN 2016 - 2022 SHOWING EXTENT OF LANDS IN APPLICANTS CONTROL OUTLINED IN GREEN DASHED LINE

AREA OF LAND OWNED BY THE APPLICANT (GREEN DASHED LINE)

EXTENT OF PROPOSED AMENDMENT  
EXTEND AREA OF LAND ZONED TERTIARY DEVELOPMENT AREA

EXTENT OF PROPOSED AMENDMENT  
EXTEND AREA OF LAND ZONED TERTIARY DEVELOPMENT AREA

**THE PADRAIG SMITH PARTNERSHIP**  
ARCHITECTS PLANNERS DESIGNERS

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

PROJECT: PROPOSED AMENDMENTS TO DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023

TITLE: BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017

SCALE: NTS

DATE: SEPTEMBER 2017

OUR REF: DOYD1709

NO: LAP/01-01

This drawing is copyright.X



**Leonora Earls**

---

**From:** Ruth Doyle [mailto:rdoyl@bray.ie]  
**Sent:** 15 September 2017 10:35  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP - Oldcourt House

To Whom It May Concern,

We wish to raise an objection to the proposed rezoning of 1.5 hectares of land at Oldcourt for residential development.

Whilst we fully understand the need to provide land for new housing in Bray, we feel this is a wholly inappropriate location for the following reasons;

- this land is one of the few remaining green spaces in the town.
- there is an existing Tree Preservation Order on these lands which many species of birds flock to throughout the year.
- it is an important habitat for foxes, squirrels, hedgehogs, to name a few
- Oldcourt Castle & Bawn (built in the 17th century) is a protected structure since 1940, the surrounding area is marked on the Register of Monuments & Places as a burial ground for objects of historical interest.
- Bray town has already lost many beautiful buildings/structures of historical interest over the years eg. the Turkish Baths (now the Florentine shopping centre), the International Hotel (now Bray Bowling), Little Bray Castle on Castle Street, built in 1459, demolished in 1937 (now Supervalu & shopping units) are just a few.
- This land is currently zoned OS4 which aims to preserve continuous open space along the Swan River.
- Any more development of this area would result in soil erosion and the OPW has already deemed Oldcourt River and surrounding land to be within a flood zone.
- There is potential for the creation of an urban greenway that would benefit all residents of the area. It would be wonderful to be able to walk along the river to get from one part of Bray to another instead of walking busy & congested roads.
- Bray Town Council has done some wonderful work improving the look and amenities along the Bray promenade. It is now time to look elsewhere in Bray and develop other places of interest & natural beauty (not privately owned) so that people don't always have to travel to the beach or outside Bray to enjoy nature.
- As a resident of Giltspur Wood, we are hugely concerned that we would lose our existing child friendly cul de sac, so that access may be gained to this land should rezoning be approved. It is an area where the parents of younger children know they will be safe from cars, they can cycle/scoot freely, use the existing wall for tennis, football, chalk drawings etc.
- We bought our property (in a cul de sac of 4 houses within the estate) for the very reason that it would be a safe place to raise our young family, to allow our children (age 5 & 7) the freedom to play safely outside our home.
- Two years ago, it was decided by Bray Town Council to route all Giltspur Wood traffic one way onto Oldcourt Road, no longer allowing residents to drive down Soldiers Road and onto Boghall Road. This change, together with the traffic from the new neighbouring estate Castelynn, has made the junction at Oldcourt Road, onto Killarney Road, a very congested area during peak times. Further development would exacerbate this problem greatly.

We ask that you consider our submission and take steps to ensure lands at Oldcourt House are not rezoned for residential use.

Yours sincerely,

Ruth Doyle & Patrick Tobin,  
91 Giltspur Wood,  
Bray,  
Co Wicklow.

**Leonora Earls**

---

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**Sent:** 15 September 2017 10:35  
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We ask that you consider our submission and take steps to ensure lands at Oldcourt House are not rezoned for residential use.



**Bernadette Harvey**

---

**From:** Malcolm Lane  
**Sent:** 12 September 2017 11:38  
**To:** Planning - Plan Review  
**Cc:** Leonora Earls  
**Subject:** Bray Minicipal District LAP 2017-2023  
**Attachments:** draft Bray Municipal LAP Sub 2017.pdf; Submission map.pdf; 2010-2016 Map.pdf; Kilmurray 2017.pdf

Dear Sir / Madam,

Please find attached submission on behalf of the Draper family at Kilmurray, Kilmac.

Yours Sincerely

Malcolm Lane  
PD Lane Associates

BA MRUP MA(UD) MIPI MUDG  
Town Planner & Urban Designer

malcolm.lane@pdlane.ie  
T.direct +353 1 287 3630

1 Church Road	T +353 1 287 6697	architecture
Greystones	F +353 1 287 0109	urban design
Co.Wicklow	E info@pdlane.ie	planning
Ireland	W www.pdlane.ie	engineering

**Draft BRAY MUNICIPAL DISTRICT  
LOCAL AREA PLAN  
2017-2023**

**SUBMISSION TO:  
WICKLOW COUNTY COUNCIL**

**In respect of:  
LANDS AT KILMURRAY SOUTH  
KILMURRAY, KILMACANOGUE,  
CO. WICKLOW**

**Prepared on behalf of:  
RICHARD DRAPER**

**By:  
PD LANE ASSOCIATES  
ARCHITECTURE & ENGINEERING  
PLANNING & URBAN DESIGN**

**SEPTEMBER 2017**

## **GROUNDS OF SUBMISSION**

Wicklow County Council has proposed a draft Bray Municipal District Local Area Plan for the period 2017-2023 ('draft Bray LAP 2017'). This submission is being made on behalf of Richard Draper in the context of the recently published draft Bray LAP 2017.

This submission relates to the lands in the ownership of Richard Draper encompassing the family's concrete products yard and commercial buildings and his own house and that of his son Robert Draper ('the Subject Lands'). The Subject Lands are now proposed to be outside the Rural Cluster of Kilmurray (Kilmac) – see mapping attached.

Part of the Subject Lands were designated in the County Development Plan 2010-2016 as an area '*restricted to the development of one dwelling only*' within the Settlement Boundary (see map attached). This hatched designation referred to Richard Draper's dwelling and Robert Draper's dwelling (granted under Planning Reference: No. 12/6054).

The draft Bray Plan 2017 proposes to remove the Settlement Boundary around the Subject Lands, and the existing designation (which is no longer applicable). Removing the Settlement Boundary from around the Subject Lands is considered unacceptable by the landowner as there are two existing houses and a long-standing family business operation at this location.

There is extensive landscape screening surrounding the existing concrete products yard and commercial buildings which mitigate any views to it from the surrounding area, and there are piped water services in the vicinity of the Subject Lands.

The Draper family operate the concrete supply business, Sugarloaf Concrete Products Limited on the Subject Lands, and live in the family homes adjacent to this business which has been operating for over 30 years now, providing building products and is a local employer.

It is submitted that the Subject Lands should be within the Settlement Boundary of the Rural Cluster of Kilmurray (Kilmac) and the existing concrete products yard and commercial buildings be designated for Employment Uses - Light Industrial & Warehousing in the upcoming Bray Municipal District Local Area Plan 2017-2023.

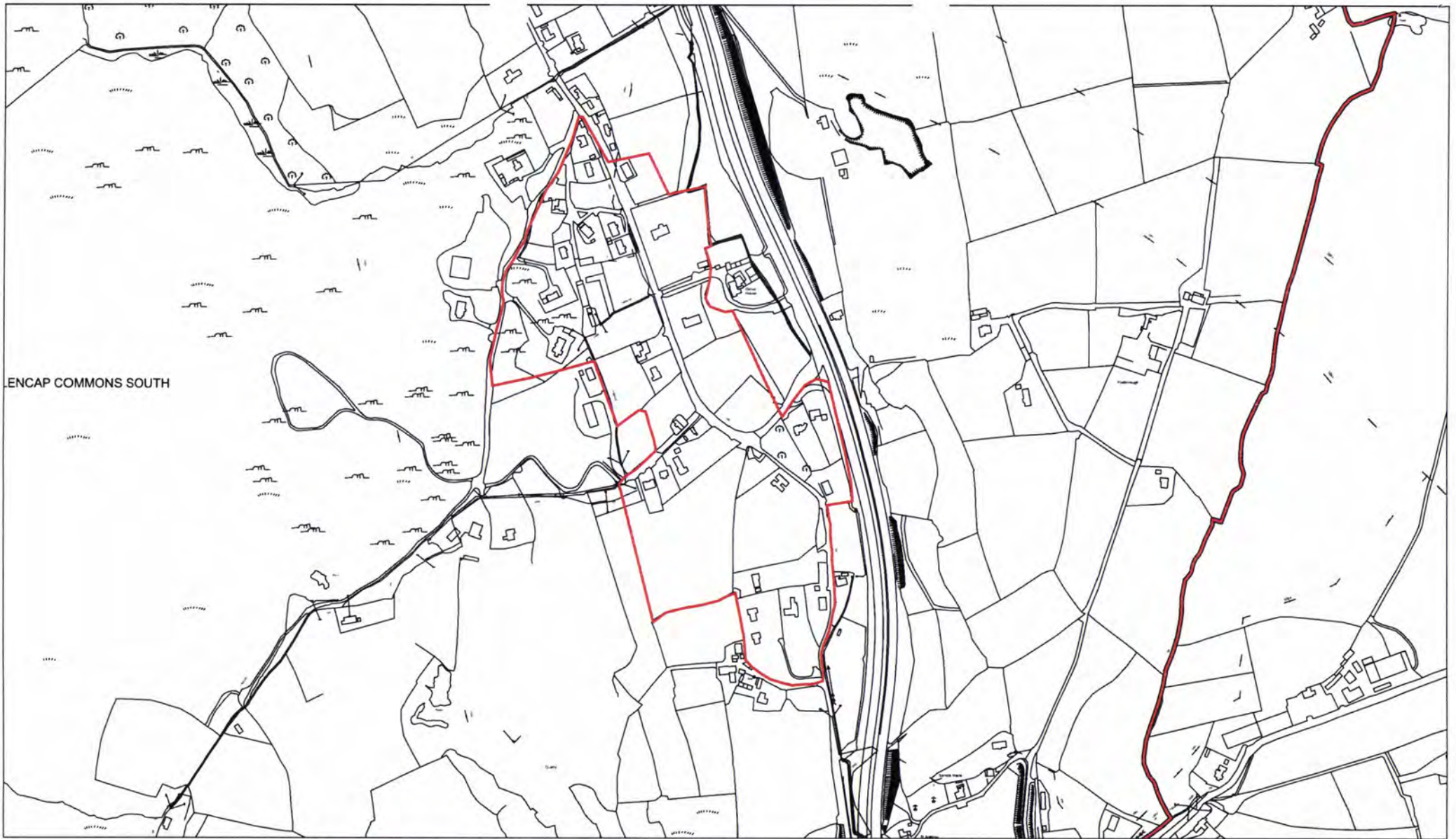
*Malcolm Lane*

---

Malcolm Lane

BA, MRUP, MA (UD)

**PD Lane Associates**





WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District  
Local Area Plan  
2017**

LAND USE ZONING MAP **DRAFT**

**Title: Kilmurray  
Map No. : 5**

 Municipal District Boundary  
 Settlement Boundary



Wicklow County Council  
Planning Department

Maps are not to scale

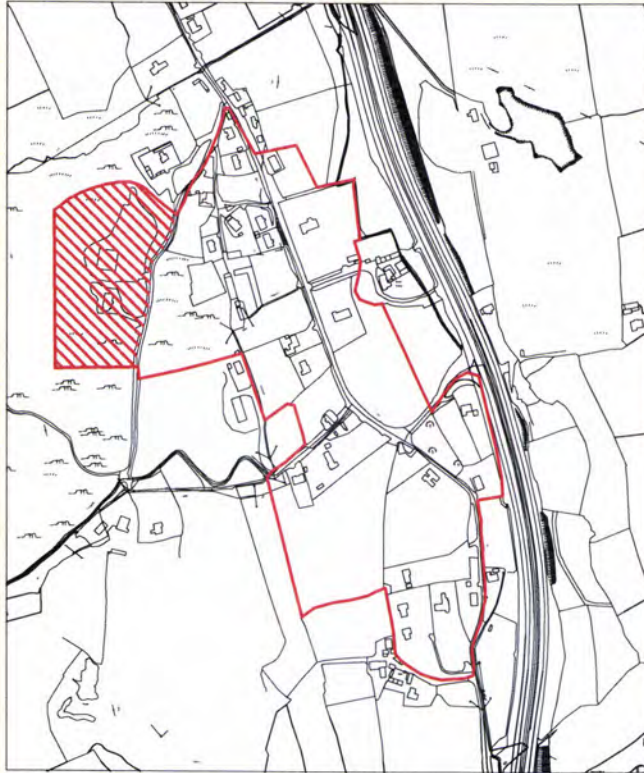
Ordnance Survey Ireland. All rights reserved.  
Licence Number 2017/35/CCMA/Wicklow County Council



# Settlement Boundaries - Rural Clusters

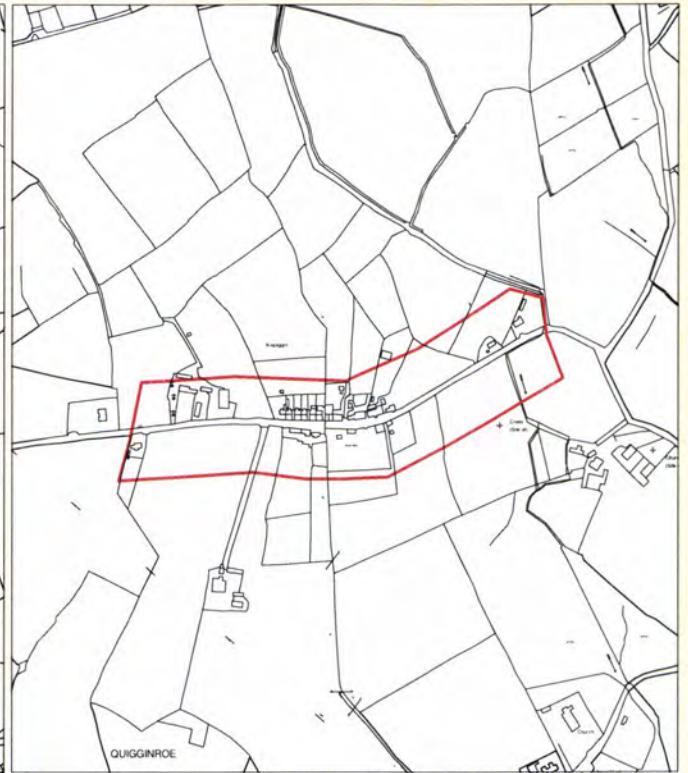


Map No. 06.04 F

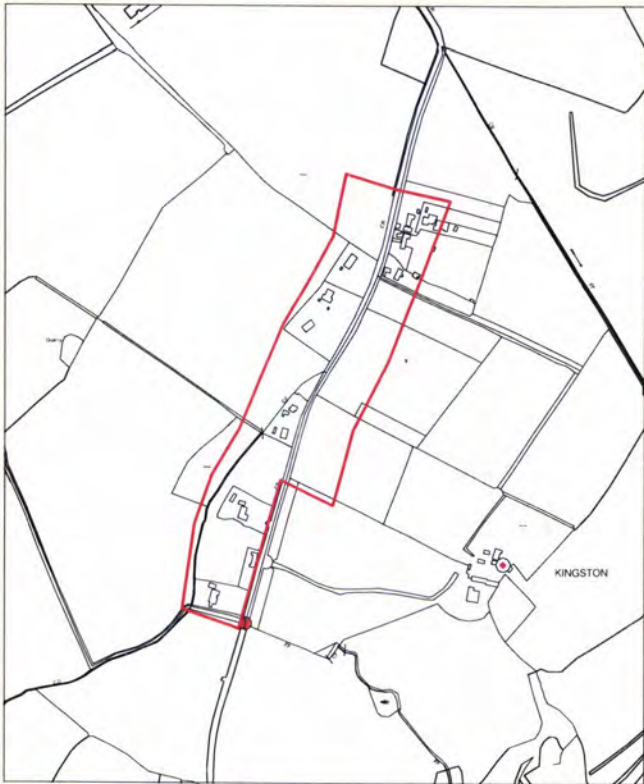


**Kilmurray (1:10,000)**  
(Kilmacanogue)

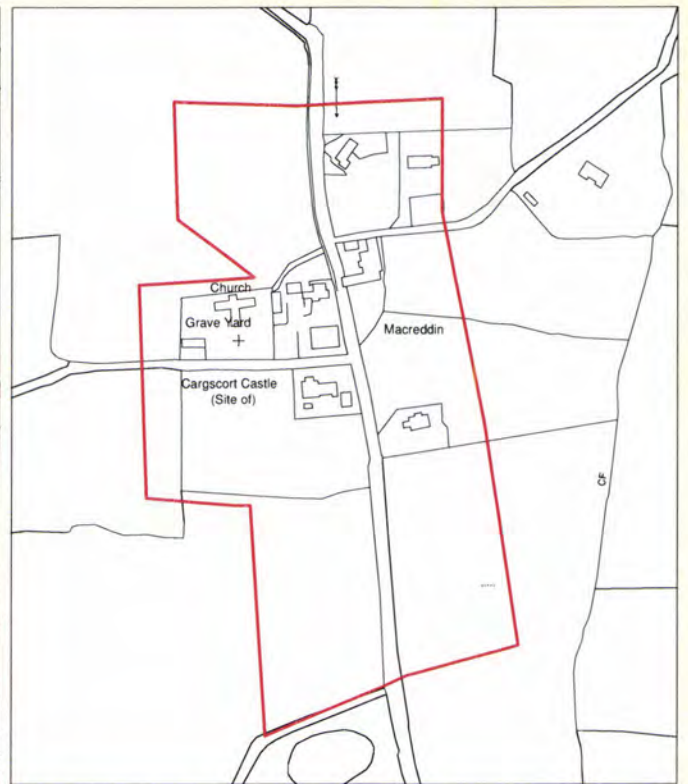
( Hatched area restricted to the development of one dwelling only )



**Kilquiggan (1:10,000)**



**Kingston (1:10,000)**



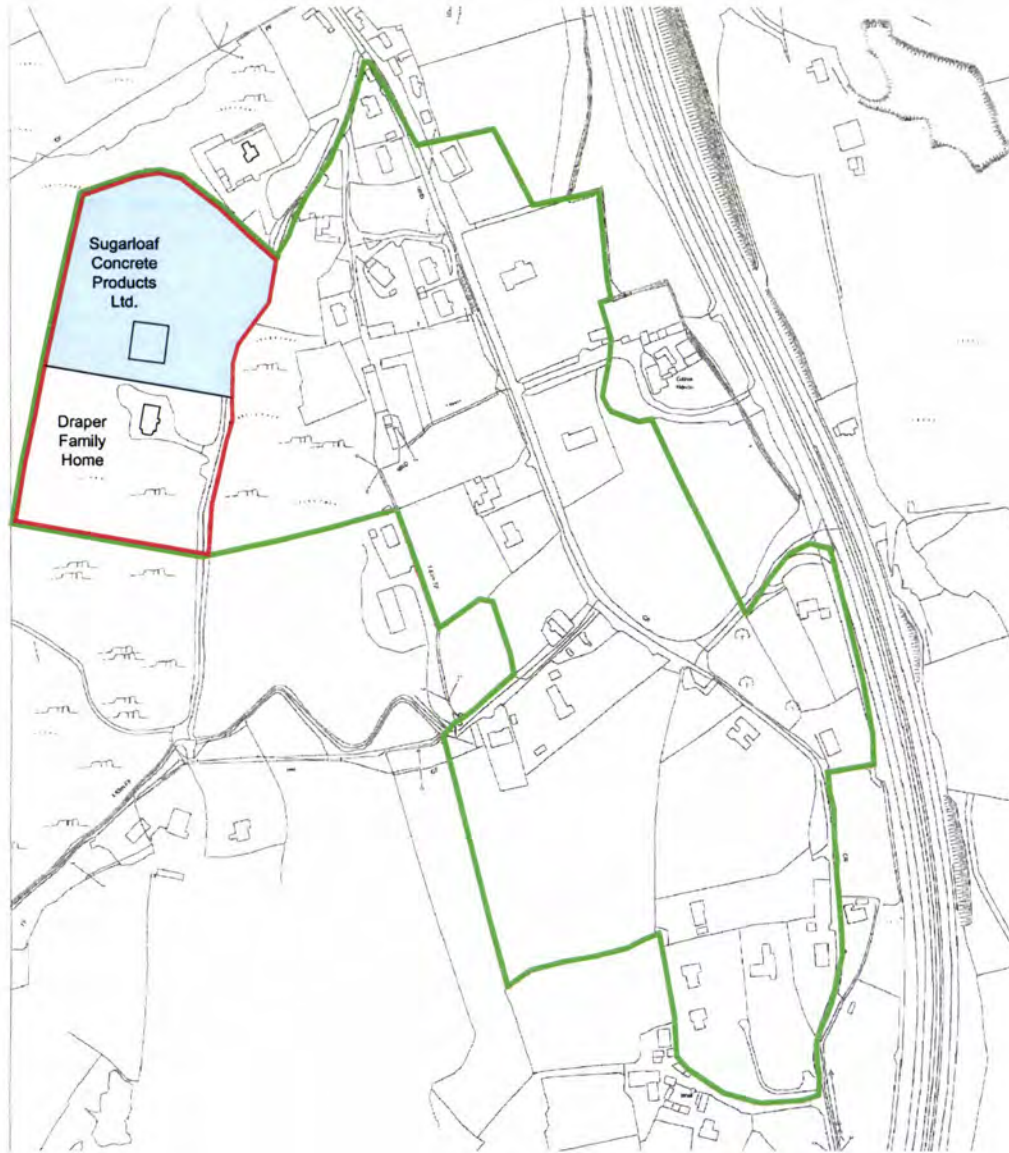
**Macreddin (1:5,000)**

**LEGEND**

**Development Boundary**

Wicklow CDP 2010 - 2016





**LEGEND:**

Kilmurray Rural Cluster edged green:

Draper Family Lands (subject lands) edged red:

Proposed employment uses zoning:

## KILMURRAY - KILMACANOQUE



**GENERAL NOTES**

This drawing should be read in conjunction with all relevant documents. Dimensions are in millimeters unless otherwise stated. Do not scale off drawings. Use figured dimensions only. Check dimensions on site. Report discrepancies immediately. Title copyright and right to use this document reserved to P.D. Lane Associates. All works are to comply with current building regulations. This drawing is for planning purposes only, not to be used for construction purposes unless otherwise stated.

REVISION	DATE	DESCRIPTION



1 Church Road T +353 1 287 6697  
 Greystones F +353 1 287 0109  
 Co. Wicklow E info@pdlane.ie  
 Ireland W www.pdlane.ie

PROJECT		Lands at Kilmurray - Kilmacanogue	DRAWING NO.
CLIENT		Draper Family	REVISION NO.
DESCRIPTION			
BRAY MUNICIPAL DISTRICT - LOCAL AREA PLAN 2107 - 2023			
STAGE	DATE	19-02-16	
SCALE	not to scale	DRAWN BY	gm

**Leonora Earls**

---

**From:** Rebecca Drew [mailto:rebecca.drew@planningireland.com]  
**Sent:** 15 September 2017 16:51  
**To:** Planning - Plan Review  
**Subject:** Objection to Proposed Roadway Little Sugarloaf

We, at Copsewood Farm, Kilmacanogue object to the road proposal across the Little Sugarloaf.

WICKLOW COUNTY COUNCIL

15 SEP 2017

PLANNING DEPT.

C105

The Arches

Kilmacanogue

Bray

Co. Wicklow

Re: BRAY MD LAP

To whom it may concern;

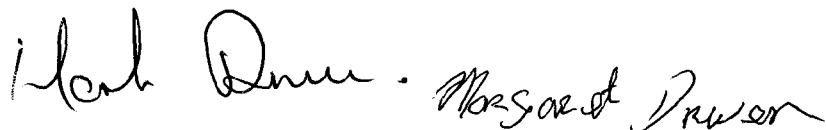
I have been a resident in Kilmacanogue since 1976. My home is located between the lavender field and Topaz filling station on the south bound carriageway along with 4 other dwellings. I have witnessed many changes take place in the early 00's. So called road improvements were carried out at this time and since then entering and exiting my home on to the N11 has become a daily challenge. No longer can you walk, cycle or drive to Kilmacanogue Village without putting yourself in great danger. With so many entrances and exits in close proximity to each other and such a high volume of traffic, determining where the drivers wish to enter or exit is very unclear.

The previous "road improvements" have had a devastating effect on Kilmacanogue Village as a whole. The TII report proposes to run an additional service roads along side the existing N11 as well as bike lanes and footpaths. The TII proposal to add additional lanes to the N11 while retaining all the existing entrances in my opinion is not going to work. If the plans are carried out there will be no improvement in access to the school or shops. The same entrances will remain, The filling station will remain, Glen fuels will remain. Cars are currently on a weekly basis crashing into the walls the entire length of our footpath and there have been incidents where on more than one occasion cars flipped on their roof landing in the forecourt accessing the filling stations. All of these incidents are currently taking place in a 60kph speed zone.

The volume of traffic is increasing on a daily basis and with future growth planned for Greystones, Kilcoole and Newtownmountkennedy and also increased speed limit to 100k/ph. The limited space which currently exists is already at breaking point. At this location on the N11 is where many people are only starting their long commute home to the south as far as Wexford Town, commute times home is their highest priority not the residents of Kilmacanogue.

In the proposed WCDP it Shows land to the east for development. This area is the answer to our current existing entrance problems. Constructing a road (approximately 350 meters) through these fields will re connect us with the village in the safest possible manner and will remove all dangers which we currently face. This access will integrate our homes and will mean we will no longer face a round trip on the N11 to Hill's roundabout and contend with commuters to Bray just to return home. An example of this service road would be Foxborough Lane further to the south. This road has been constructed to allow residents to use services in their locality without needing to access the N11 or the need to development of the entire area to accommodate existing residents.

Yours Sincerely





**Leonora Earls**

---

**From:** Aisling Driver [mailto:aisling.driver@wtd.ie]  
**Sent:** 14 September 2017 23:03  
**To:** Planning - Plan Review  
**Subject:** Local Plan Area (Enniskerry)

We James and Aisling Driver of 75 Parcnasillogue, Enniskerry, Co. Wicklow. Have looked and the new Proposed Draft Area Plan for 2016-2022 (2023-2028) and are satisfied what is been proposed at present.

Regards

James and Aisling Driver

Sent from my iPhone

**Leonora Earls**

---

**From:** Cindy Driver  
**Sent:** 14 September 2017 12:37  
**To:** Planning - Plan Review  
**Cc:** m'  
**Subject:** Local Area Plan (Enniskerry) 2016-2022

We Niall and Cindy Driver of 75 Parcnasillogue, Enniskerry, Co. Wicklow. Have looked and the new Proposed Draft Area Plan for 2016-2022 (2023-2028) and are satisfied what is been proposed at present.

Regards

Niall and Cindy Driver.

WICKLOW COUNTY COUNCIL  
15 SEP 2017  
PLANNING DEPT.

Cois Na Habhann  
Kilmacanogue  
Bray  
Co. Wicklow

Re: BRAY MD LAP

To whom it may concern;

I have been a resident in Kilmacanogue since 1976. My home is located between the lavender field and Topaz filling station on the south bound carriageway along with 4 other dwellings. I have witnessed many changes take place in the early 00's. So called road improvements were carried out at this time and since then entering and exiting my home on to the N11 has become a daily challenge. No longer can you walk, cycle or drive to Kilmacanogue Village without putting yourself in great danger. With so many entrances and exits in close proximity to each other and such a high volume of traffic, determining where the drivers wish to enter or exit is very unclear.

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Yours Sincerely

Pat Driver  
Nancy Driver  
Bog Driver  
Nancy Driver  
Paul Driver

Leonora Earls

---

**From:** Alan Duffy  
**Sent:** 12 September 2017 14:01  
**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; duffy.samantha08  
**Subject:** Draft Bray Municipal District LAP 2017: SLO 1 – Kilruddery

Dear Councillors

At a recent meeting in the Royal Hotel in Bray, it was brought to our attention that a draft plan has been created for the development of certain areas within the Bray Municipal District.

The scale of the proposed development within the Kilruddery estate was quite alarming, and we believe that it is not in keeping with the existing area of natural beauty, and that the number of residential units (240), in addition to a proposed rezoning of more land for employment purposes, is just not feasible given the lack of infrastructure surrounding the Southern Cross Road.

We would like to clarify that we are not opposed to the development of houses, as there is a need for greater housing in the area. It is simply the scale, as well as the location that we object to.

We would like to raise our objection on the following grounds:

- **Existing lack of Infrastructure.** There are several limitations on the Southern Cross Road (which already contains 9 housing estates). For example, there are no shops and no public buses into Bray town. County Councillors present at the meeting even confirmed that they have lobbied for years for litter bins along the Southern Cross Road, only to be told there is no funding available. So without significant further investment in infrastructure, we feel that further development is not appropriate.

- **Impact on Traffic** – Traffic is already at a standstill in both directions at peak hours on the single lane Southern Cross Road, especially in the mornings.

We have two children attending St Patrick's National school in the town and a third in pre-school; and the commute for a 2.7km journey can take over 25 minutes in the morning. There is complete gridlock at the Greystones roundabout on the Southern Cross Road due to the amount of traffic entering Bray town for work, but also to access the 7 schools either on or adjacent to the Vevay Road. We feel a further 240 houses (a very conservative estimate of 250-300 cars) would tip this over the edge.

- **Vehicle Access:** The plan states that vehicles would access the new estate via the existing Kilruddery House. In the *Draft Bray Municipal District Local Area Plan 2017 - Maps and Schedules*, the entrance gates and piers in Kilruddery are listed as protected structures and Anthony Ardee (the owner of Kilruddery Estate) was less than convincing when asked if he was happy with such an amount of traffic passing through his main entrance every day. It is our understanding that the proposed entrance can be changed once zoning is approved, so there is a possibility that this could be shifted to an existing access gate between the Swanbrook and Earlscroft estates, or via Hollybrook Park (which would obviously be our main personal objection).
- **Impact on area of natural beauty.** The LAP does not contain an accurate map and states that the plans “may be amended in light of best fit that arises on the lands”. So we would object on the basis that there is no accurate information clearly explaining the impact on the views we currently enjoy.
- **Pedestrian and Cycling Access through Hollybrook:** This is mentioned in passing in the plan with little detail, but it seems that the only safe way to do this would be to reduce some of the existing wooded area. As there are no details as to how the access would work, what the impact would be, how secure this access route would be, we would object to the overall plan on this basis. Again, our understanding is that once the land is zoned, it would be all too easy for the Council to make these kinds of decisions without consulting the Hollybrook residents.
- **Noise:** There are two parts to this. There is a proposal to re-zone a parcel of land for employment use, most likely light industrial. This in itself is likely to increase the noise levels at night time from the fans/turbines on these premises. But a greater concern would be if any trees from the existing woodland are removed in future to allow for the above pedestrian/cycling access, the buffer that these trees provide from the existing noise levels would have a significant effect. And again this cannot be currently measured from the high level detail in the existing plan.
- **Ownership of each parcel of land** – The ownership of each area of land is not clear. There is the existing wooded area adjacent to Hollybrook. If this is converted for pedestrian or cycling access, who is responsible for maintaining it, and who is liable in the event of any issues or accidents? Then there is a proposed playground which has the potential to attract “visitors” at night time. Is this likely to have CCTV or any other security measures? And if any flooding overflows from buffer zones, who is responsible in that case?
- **Flood risk:** During the Royal Hotel meeting, Hollybrook residents highlighted problems that already exist with flooding in their back gardens. Anthony Ardee also confirmed that the ditches in the woodlands adjacent to Hollybrook are blocked. So this is more of a precautionary concern than some of the more obvious issues.

Based on all of the above factors, we would strongly object to the plans in their current form.

We understand you will all meet at some point in September to discuss, so we would appeal to you to listen to what the residents have to say and to take our objections into consideration when considering the current plan.

Yours sincerely

Alan & Samantha Duffy

40 Hollybrook Park, Southern Cross Road, Bray

**Leonora Earls**

---

**From:** Sonya Duggan <...@...com>  
**Sent:** 13 September 2017 10:40  
**To:** Planning - Plan Review  
**Subject:** Little sugar loaf Bray development plans

Hello and good morning ,

I am writing to you with regards to the proposed housing / industrial development plan at little Sugarloaf in wicklow. As a Bray resident growing up in this area I have witnessed over the years much destruction and pollution of the local landscape due to overdevelopment.

I fully support Councillor Joe Beehan with regards to this debate and state that I am AGAINST the proposed development as i believe it would cause further devistation to the eviornment, ecological system the local dwindling wildlife and impact our local heritage negatively. It is extremely important to keep areas such as little Sugarloaf free of toxic development to provide the eco system a balance for plant and wildlife sanctuaries .

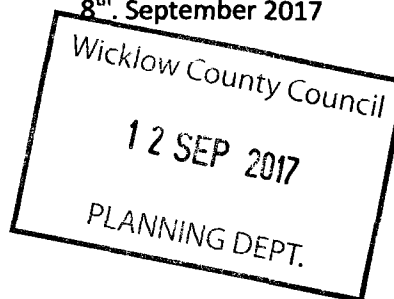
Sincerely

Sonya Duggan  
34 Oldcourt Drive  
Oldcourt Road  
Bray  
Co wicklow

Administrative Officer  
Planning Department,  
Co. Buldings  
Whitegates,  
Wicklow Town.

31 Giltspur Wood,  
Oldcourt Park,  
Bray,  
Co. Wicklow.

8<sup>th</sup> September 2017



BRAY MD LAP

Dear Admin. Officer,

We John and Rosaleen Dunne as Residents of 31, Giltspur Wood for the past 20 years plus, strongly object to the proposed plans to rezoning of land adjacent to our estate which would include a road through our estate.

Giltspur Wood is a Mature Estate which has a lot of Children including our own Grandchildren playing safely every day. The Cul de Sac and Green Area where the construction work is intended is a safe place for the children to play, therefore it would not be acceptable for this planned work.

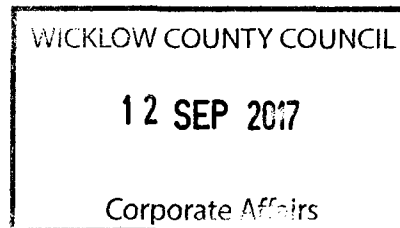
As Residents we take great pride in looking after our Estate. Once again we would like to lodge our objection . We can be contacted any time at the above address, or by mobile or

Thanking You

John Dunne

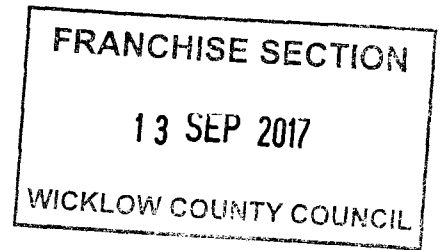
Rosaleen Dunne

*John Dunne*  
*Rosaleen Dunne*





"BRAY MD LAP"



81 Giltspur Wood

C112

Bray

Co Wicklow

12/09/2017

Administrative Officer

Planning Section

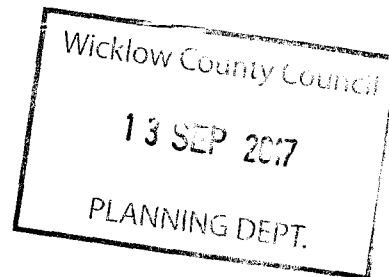
Wicklow Co Council

Station Road

Wicklow Town

Co Wicklow

To Administrative Offer



I am writing to make an objection to the rezoning plans adjacent to Giltspur Wood. (~~Bray MD Lap~~ 2017)

The reasons being

1. **Safety** – Possibility of 60 more cars passing through our estate if 30 units were built Driving passed our green area where my kids play.

**Traffic** – Further increase to traffic in the area which has already increased due to one way system on Soldiers Road. The new development Castlelynn is not yet occupied but once this happens it will cause further increases. We do not need another development to add to this.

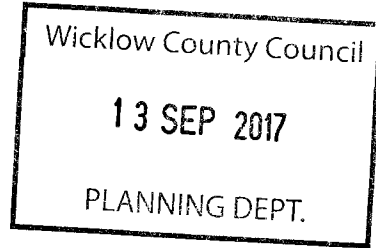
**Preservation Order** – There is a tree preservation order which covers all the trees on proposed site – order no 5 Oldcourt House and Vevay House, Swan River. There is also a 600 year old protected structure on this land.

I would like to see the proposed land turned into a river walk as per original estate plans.

Please consider these points, before granting permission

Many thanks  
Sharon Dunne

FROM: 67 GILTSPUR WOOD,  
KILLARNEY ROAD,  
BRAY,  
Co. Wicklow.



TO: Administrative Office,  
Planning Section,  
Wicklow County Council,  
Station,  
Wicklow Town.

C113

SUBJECT: BRAY 17D LAP.

10/9/2017.



Dear Sirs,

I wish to object to the rezoning of land beside, Giltspur Wood, Bray, Co. Wicklow.

There would be loss of green space, trees, wildlife etc if the land is rezoned.

There would be additional loss of green space in our existing estate to facilitate traffic to new houses.

There is a 600 year old protected structure on the land, and a tree preservation order on the trees on the land.

The area under construction would be a playground for small children.

The rezoning would involve breaking through an existing cul de sac and traffic entering and exiting the estate on Soldiers Road is already choked up and this would only add to the problem.

Yours Sincerely,

Divienne Dunne.

**Leonora Earls**

---

**From:** Meadhbh Durnin [mailto:meadhbh.durnin@wcc.ie]  
**Sent:** 14 September 2017 21:43  
**To:** Planning - Plan Review  
**Subject:** Objection to new/residential zoning on Kilruddery Estate and Small Sugarloaf

To the Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Wicklow Town,

I wish to inform you of my objection to the new/residential zoning on Kilruddery Estate and Small Sugarloaf.

I am a resident in Earlscroft, on the Southern Cross Road, since August 1996. When we purchased our house we were promised many many services none of which have materialised. We have lived with a main road that is poorly serviced and completely neglected. The Southern Cross Road is already at capacity as far as traffic is concerned, and the proposed plans would only add to that. In addition:

- The footpaths are incomplete in places, neglected, with planting and hedges overgrown covering the path or in your face.
- There is no gritting on the road or footpaths during the colder weather (yet if you walk around the block, both the paths and road are treated on the Boghall Road).
- There are no cycle lanes, so I either take my life into my hands on the road with all the existing residential and industrial traffic, or I cycle on the foot paths to the annoyance of pedestrians. (again if you go around the block, there are cycle lanes on the Boghall Road).
- There are no litter bins.
- There are no shops/newagents - or any general facilities, despite being promised this when we moved into the area in 1996.
- Coming out of our estate in the morning trying to cross the road requires anything from 2-5 mins waiting for a gap in the traffic, or getting one my kids out of the car to press the button for the traffic lights. How on earth could this road handle 200+ more families, most of which will have 2 cars!
- The Southern Cross is quite often backed with traffic from one end of the road to the other due to the high volume of traffic - again how can it handle all the increased industrial traffic.
- Public transport is another issue - or lack thereof!

If you have any comments or questions I will be happy to discuss in further detail.

Kind Regards

Meadhbh Durnin,  
11 Earlscroft,  
Bray,  
Co. Wicklow.

**Leonora Earls**

---

**From:** Deborah Dutton [z]  
**Sent:** 15 September 2017 17:04  
**To:** Planning - Admin

[planadmin@wicklowcoco.ie](mailto:planadmin@wicklowcoco.ie)

To planning department wicklow county council

"I wholly and irrevocably object to the proposed rezoning etc,. If the site beside Giltspur Wood it would have catastrophic problems for our estate

Deborah Dutton

Sent from my iPhone

## Leonora Earls

---

**From:** Deborah Dutton [  
**Sent:** 15 September 2017 17:06  
**To:** Planning - Admin

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

Ref: BRAY MD LAP

Dear Administrative Officer:

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

a) Health and Safety

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

b) Traffic Congestion

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

c) Flood Risk

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

d) Tree Preservation Order

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

e) Wildlife

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

f) Protected Structures

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

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

Sincerely,

Deborah Dutton

Sent from my iPhone

**Leonora Earls**

---

**From:** mail.gmx.com [i]  
**Sent:** 14 September 2017 19:43  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP

BRAY MD LAP

To whom it may concern,

I have some observations to make regarding the draft plan:

1. Any zoning which might expand the built-up area closer to the Sugarloaf mountains, to Bray Head, to the River Dargle should, in my view, be removed from the plan.

I believe there is an SAAO for the Sugarloaf mountains, which should be put in place.

Any zoning which expands the built-up area in general, to land which has not been built on, or to land which does not have zoning for construction, should also be removed.

Consideration must be given to those who work in rural occupations, who may find satisfaction from those occupations, to those who work with or close to nature, to those who live in or visit such areas. Rural employment, food production and nature should be a high priority, allowing farmland and natural environments to be used for construction is likely to store up problems for future generations.

It must also be said, that the aim of making Bray a town conducive to walking, becomes less and less possible as it expands, commuting also takes longer and longer, and public transport routes cannot be extended infinitely.

There is development potential, and there is also overdevelopment and profiteering, we should not repeat the mistakes of the past, such as those of the Celtic Tiger - e.g. Charlesland, Carrickmines, Dundrum.

Ideally, no further construction should take place on any lands not currently built on, and this principle should guide this and future plans.

The population may not grow as significantly as predicted (it must be taken into account that we now have an older population and a lower birth rate), and in future, typical 2-3 bedroom houses may make way for higher density housing (this is quite likely).

3. As much as possible, disused sites on areas zoned for employment should be used for either non-automated manufacturing, very high density housing or parks, but not for offices.

There is an abundance of offices and industrial units, many derelict or unfinished, in Wicklow, and in neighbouring Dublin, there is no point in allowing for the construction of more.

It must also be said most office buildings also make any landscape generally dreary, in fairness.

The high technology sector should not be promoted above local businesses, and should perhaps be at the bottom of the priorities for economic growth in the area - it does not provide large scale employment, there are also ethical concerns in promoting high technology.

Another point to consider is that we must attempt to promote local businesses, and increase employment in manufacturing and trades, as many find satisfaction from this.

4. The aim of the plan should be to provide housing for those who work or wish to work in Bray, Enniskerry and Kilmacanogue, rather than those who wish to commute out of those areas into Dublin.

5. Retail units should be strictly limited to the Bray town centre area (Main Street). It seems unnecessary and unreasonable to have convenience shops and larger shopping centres in Enniskerry and Kilmacanogue. The draft plan appears to allow for improved routes between Enniskerry and Bray, this may defeat the purpose of having more retail units in Enniskerry.

6. Allowing for office units in Enniskerry should be removed from the plan. Enniskerry being a smaller settlement, and there being office space in Bray, and the two areas being only 5 km apart, it seems unreasonable to allow for office space here, which would alter the identity of Enniskerry. An allowance could be made for small industrial units, perhaps to encourage local businesses, such as breweries (brewing now being a growing industry in this country).

7. The plan should allow for an orbital route around Bray, totally within the Bray urban area. It should not allow for any expansion of the N11/M11. There is an inefficiency in our infrastructure, in that there is no direct route, within Bray, between one end of the town and the other. Ideally, I would suggest a direct route from Little Bray, going through the western side of the town (close to the edge of, but still within, the urban area), through to Southern Cross and the southern end of Vevay Road.

There should perhaps be some research done into the possibility of connecting existing roads in Bray, such as the following: Upper Dargle Road (at its western end) to Herbert Road (this would likely require a bridge over the Dargle River), and Herbert Road to Ballywaltrim Lane.

If such a route did exist, a bus route could be put in place in the future, to transport people from one end of the town to the other. Such a bus route could be linked to existing routes between Vevay Road, along the Main Street to Little Bray, providing good transport around the town.

8. There seems to be a lack of large parks, or land left in its natural state, in Bray, the plan should attempt to address this.

I would like to ask you to consider these points in the formation of your plan.

Kind Regards,  
Alex Endrizzi

7 Garden Village Drive,  
Kilpedder,  
Co. Wicklow



**Leonora Earls**

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**From:** Boris Fennema [mailto: ]  
**Sent:** 04 September 2017 20:33  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017

To whom it may concern.

I would like to object to the rezoning of lands in Kilruddery Estate for housing (R20, 240 houses Table 3.1) on the basis of the following:

- a) Flooding is an issue in the area and with extra houses will only get worse.
- b) There would be insufficient access to the houses via the main gate of Kilruddery Estate
- c) The Southern Cross Road is at peak times at a stand still with current traffic
- d) The area of the Sugarloaf should be preserved as an area of natural beauty.
- e) The buffer between Swanbrook and Kilruddery should be maintained.
- f) There is no infra-structure on Southern Cross despite promises - Public Transport to Bray Dart Station is reduced, no bins, no shops and minimal maintenance of road side verges.

Best regards,

--


Boris Fennema

**Bernadette Harvey**

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**From:** Aidan ffrench [mailto:aidan@bray.ie]  
**Sent:** 09 September 2017 14:49  
**To:** Planning - Plan Review  
**Cc:** Aidan ffrench  
**Subject:** Submission in relation to Bray Municipal Draft Development Plan 2017-2023 -

Aidan ffrench has shared a OneDrive file with you. To view it, click the link below.

 Draft Bray MD L.A.P 2017-2023\_AJ.ffrench\_201708 1.doc

Dear Ms. O'Leary,  
Please find attached my submission.  
I'd be obliged to receive a confirmation of receipt in due course; thank you.

Sincerely  
Aidan J. ffrench  
Bray.

Aidan J. ffrench MILI Registered Landscape Architect

11 Swanbrook,  
Bray, Co. Wicklow

e: f

m: 07 800 000 000

Sheila O'Leary, Administrative Officer  
Planning Department,  
Wicklow County Council  
County Buildings, Station Rd.,  
Wicklow Town

9 September 2017

(by em: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie))

**Re: Submission in relation to Bray Municipal Draft Development Plan 2017-2023 -**

*Dear Ms O'Leary,*

Thank you for the opportunity to make a formal submission on this first stage, public consultation on the Bray MD Draft L.A.P (Local Area Plan). I have structured by submission as follows:-

1. **General Comments - Process and Public Engagement**
2. **Compliance with European and Irish Policies and Guidelines**
3. **Proposed Objectives**
4. **Proposed Land Use Zonings**
5. **Summary of Suggestions**

The submission contains both a critique and positive suggestions, which are aimed at enhancing the practical effectiveness of the Draft. My main concern is that the Plan is adequately and appropriately crafted to optimise sustainable development in Bray, with an emphasis Quality Life through Blue-Green Infrastructure, Recreation and Tourism; as well as appropriate residential, commercial and mixed-use development. Critically, to succeed in serving people, the Plan should be based upon best professional and progressive practices, and in accordance statutory guidance.

The submission is informed by Irish and European policies, best practice and guidance. In that respect, to assist the Council staff and other readers, I've cited key references (listed in Appendix A) in the text of my submission, as well as providing useful and relevant sources of information (Appendix B). My submission is also informed by over 30 years experience and expertise in land-use/spatial planning in Ireland and U.K, mainly working in local government practices. I am familiar with and currently involved in planning and

Landscape Architecture in Ireland, both Forward Planning and Development Management; and various critical issues relating to those areas.

I would be happy to discuss and clarify any aspects of my submission with you and or the forward planning team. Please note that I will be out of the country on holidays and at a conference, until Sunday 24<sup>th</sup>. September.

Yours sincerely,

---

*Aidan J. ffrench MILI*

c.c:-

1. Mr. Eoghan Murphy T.D, Minister for Housing, Planning, Community & Local Government
2. Mr. Damien English T.D, Minister of State for Housing & Urban Development
3. Mr. Stewart Logan, Planning Adviser, Dept. Housing, Planning, Community & Local Government, Custom House, Dublin
4. All Wicklow Co. Council Councillors (31no.)
5. Mr. Andrew Doyle T.D, Minister of State for Food & Horticulture
6. Mr. Simon Harris T.D; Minister for Health
7. Mr. John Brady T.D
8. Mr. Pat Casey T.D
9. Mr. Stephen Donnelly T.D

**Submission to Wicklow County Council on**  
**Bray Municipal Draft Development Plan 2017-2023**

by Aidan J. ffrench MILI Registered Landscape Architect

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

**1. General Comments - Process and Public Engagement**

**1.1 Process**

*"Planning is fundamentally about people and places, about the communities we live in and their futures. In planning for all our futures we have to consider the whole country, its physical infrastructure and our social and economic aspirations, while also striving to meet and address local issues and needs through the alignment of local area planning with city and country development plans, regional planning guidelines and national planning objectives. Accordingly, these Guidelines have been developed in recognition of the importance of good planning practices for local communities, their place in the wider planning context, and of the importance of those communities' involvement in the planning process." Minister's Foreward, Mr. Phil Hogan TD. June 2013. Local Area Plans - Guidelines for Planning Authorities. [bold text is my emphasis]*

Mindful of the emphasis on "people and places" and "communities' involvement" in the above quote, I wish to make a number of preliminary remarks in relation to how the planning authority prepared, published and promoted the Draft Plan. These remarks - and my submission generally - are directly informed by government policy on local government and spatial planning - 'Putting People First - Action Programme for Effective Local Government' [1], the department's (DoHPC&LG) LAP guidance [2] Local Area Plans - Guidelines for Planning Authorities and manual [3] Manual for Local Area Plans (companion document to the Guidelines on Local Area Plans); and finally, by the degree of public engagement, to date, between public and planning authority; as required by all three aforementioned government policies:-

- The final plan-making stages by WCC would benefit from an improved engagement with both public and councillors, particularly a 'reaching-out' to local communities most effected by the proposed land-use zonings and objectives in the Draft (e.g. Kilruddery Desmesne - SCR residents), before putting pen to paper.
- Regarding Kilruddery, the failure to fully and properly engage in prior consultation and participation, has damaged credibility and trust between the public and the planning authority; and been ineffective and inefficient use of time and resources. Given the degree of opposition emerging from the public, T.D, local residents and the landowner, it will likely results in careful re-considered. All this was avoidable and unfortunate in terms of gaining and building credibility

and confidence with the public. There is a danger it may contribute to an ongoing public and media perception of mediocrity in the administration and effectiveness of planning in WCC.

#### Suggestion

- Generally in future WCC Local Area and Framework Plans - and particularly in the remaining stages of this Draft LAP - that the planning authority adopts and fosters a more open and dynamic engagement with communities and the public. A creative engagement might best be nurtured and delivered using trained (planning) facilitators and community development specialists with requisite pedagogic skills. Such an approach was used successfully by WCC in the late 1990's, for the EU-funded S.R.U.N.A planning/landscape management project for Bray Head. (In the late 1980's Dublin Corporation used a similar approach with the Ballymun Task Force).

#### 1.2 Growth - Preamble and First Principles

It's clear from the Preamble to the Draft Plan's that its working assumption - by both regional and local planning authority (Wicklow County Council) - is growth as per usual, aligned to planning as per usual; without any fundamental questioning of the underlying premise of accepting unrestrained urbanisation within the south-Dublin / north Leinster corridor . The Draft Plan does recognise the environmental and spatial constraints imposed by the natural geography, landscapes and seascapes of the Bray area. However, it proceeds with an acceptance of growth, without seemingly exploring any spatial and land-use alternatives within the wider county or region. Apart that is from putting most its 'eggs' in the one basket of Fassaroe Masterplan, without consideration of wider effects and linkages in Dlr (e.g. Old Conna, Woodbrook-Shanganagh, Cherrywood SDZ, Glenamuck-Kiltarnan, etc.)

In the changing world of Climate Change and the need for tightly-grained urban form combined with Blue-Green Infrastructure, this business-as-usual planning approach is not longer tenable [4], [5]. The conventional response growth - ongoing expansion within and near the same spatial location(s) and limits is something of a straight-jacket that is locking-in existing deficiencies, constraints and deficits in Bray. The latter include poor quality and limited Green Infrastructure for Active and Passive Recreation, Leisure and Sports; natural accessible greenspace; impositions on vulnerable natural assets (e.g. Swan River undeveloped Blue-Greenway, Dargle River at Rehills/La Valleé; Bray Harbour and Cliffs undeveloped, lying derelict)

All this, begs the question of the planning authority, its neighbours and the Regional Assembly of the need for radical re-think and review - philosophy and practically - of current and conventional practice and policy in Ireland, not least in intensely-urbanising such as north Wicklow. In that

context, it would appear that the Regional Planning Guidelines (RPGs) have imposed on WCC and the citizens of Bray, an unjustly excessive allocation the 'burden' of projected population growth, with consequent demands and needs in housing social and Blue-Infrastructure, transport, water and drainage infrastructure and facilities.

**An alternative approach might encompass some of the following:-**

- Accelerated provision of Public Transport
- Concentration of population growth in other existing, small settlements with the
- A focus on mixed-used (commercial, retail, residential, leisure) higher density and high-rise (5 storey plus) within core towns and villages
- Imaginative and dynamic mixed-used re-generation of abandoned and derelict sites
- Changing from blanket industrial-employment land-use zonings in Bray Town Centre to mixed-use
- And re-zoning lands to high-density, low-car dependency, mixed-unit types and tenures
- Examine alternative sites in the Kilmacangue - Kilpeddar M11corridor and in the  
Greystones - Delgany and Charlesland areas,

It is unclear if any of the above analysis, iterations or alternative planning solutions were explored.

**1.2 Scoping and Mapping - MD Area and Urban Settlements**

The Draft Plans approach to mapping of the Bray MD area and the resultant maps are confusing and not in accordance with best practice [xx], revealing spatial and policy anomalies between county area, Greystones-Delgany conurbation and the lack of inclusion of land parcels formerly in the Bray Environs Development Plan 2011-2017, e.g. southern and western portions of Bray Head, of Kilruddery estate, demesne (Little Sugar Loaf); and the SW portion of the SCR/Woodies retail park and Brennanstown Riding School lands. This makes for confusing and difficult interpretation and lack of integration of planning zonings and objectives, failing to facilitate integrated delivery of sustainable development. For example the Kilruddery estate and demesne is split between Bray MD, Bray Environs and Wicklow County plans; no unified 'picture' or plan is available. Is this deliberate?

**Suggestions**

- Extend redline scoping of Draft Plan to include full Municipal District covering all human settlements and adjoining areas
- Prepare and Publish large format (A0 sheets), small scale (1:5,000) scaled maps of the Bray Towns/Environs and Kilmacangue/Little Sugar Loaf/Rocky Valley and Enniskerry settlements and Fassaroe/Ballyman (Old Conna) and contiguous areas

### 1.3 Quality and Content of Documentation - Technical Issues [6]

- Maps not to scale in any case (current Bray Town Development Plan's Land Use Zoning Map is designed and published to a stated scale, 1:14,000)
- For comparison with best practice, see Dlr CDP 2016-22 - 14 no. maps at 1:5,000, with overall "parent", reference map at 1:20,000..
- Inset maps in Statement not legible or to scale
- Lack of integrative approach to mapping - ref. CFRAMs and Zoning Maps,,,,

#### Suggestions

- Can be simply resolved by publishing easily legible and navigable maps, adopting Best Professional Practices in draughtsmanship and planning as follows [x] :-
- Ensure clarity of graphic symbols, representation and cross-referencing
- Simplify texts, legends and colour code [x]
- Jigsaw xxxxxxxxxxxxxx
- Green Infrastructure Map -
  - Produce and publish at smaller scale of 1:5,000
  - relate to Dlr cross-boundary aspects (e.g. Green Corridors)

## **2. Compliance with European and Irish Policies and Guidelines**

### 2.1 Compliance with International Policies

Aalborg Charter (ratified by Ireland on ); European Landscape Convention (ratified by Ireland, March 2004) **The Charter of European Sustainable Cities and Towns Towards Sustainability** otherwise known as the **Aalborg Charter** (1994) is an urban environment sustainability initiative approved by the participants at the first European Conference on Sustainable Cities & Towns in Aalborg, Denmark.<sup>[1]</sup> It is inspired by the Rio Earth Summit's Local Agenda 21 plan, and was developed to contribute to the European Union's Environmental Action Programme, 'Towards Sustainability'.<sup>[2]</sup>

### 2.2 Compliance with State guidance

#### Government Planning Guidelines

Under Section 28 of the Planning & Development Act 2000, planning authorities are legally required to have due regard those guidelines, and furthermore to make those guidelines available for inspection by members of the public; in accordance with the following sub-sections of the Act:-

*"28.—(1) The Minister may, at any time, issue guidelines to planning authorities regarding any of their functions under this Act and planning authorities shall have regard to those guidelines in the performance of their functions.*



*(6) A planning authority shall make available for inspection by members of the public any guidelines issued to it under this section."*

There are 2 such Planning Guidelines that are directly relevance to Local Area Plans <sup>1</sup>, and to the preparation of the Draft LAP for Bray Municipal District:-

1) Local Area Plans - Guidelines for Planning Authorities (June 2013) and the accompanying Manual for Local Area Plans (June 2013). Dept. Environment, Community & Local Government. Custom House, Dublin 1.

2) Sustainable Residential Development in Urban Areas (Cities, Towns, Villages). May 2009. Planning Guideline 19. Dept. Environment, Heritage & Local Government.

Of the 2 documents, the first is most relevant. Echoing 'Putting People First', both the Guidelines and Manual frequently and pointedly emphasises the vital need for not just consultation, but authentic public participation, e.g. see Guidelines' *"Introduction Key Messages"* [xxx : pg. 2]:-

- *"These guidelines disseminate best practice on local area plans.*
- *Local area plans are intended to provide more detailed planning policies for areas that are expected to experience significant development and change, through proper public participation and democratic oversight. [my emphasis]*
- *Local area plans must focus on delivering quality outcomes for local communities · informed by effective participation by those communities in preparing the local plan and the wider planning policy context."*

It is unclear whether WCC (Wicklow County Council) has given due regard, to the Guidelines. The Draft LAP fails to state where, in drafting the Plan, WCC sought to apply the principles and practices set out in the Guidelines and Manual. In some respects, it is evident that the Plan was not prepared with due regard to either document:-

- I would ask that WCC indicate if - in preparing the Draft Local Development Plan for Bray MD- it considered and gave due regard to either of these the guideline documents? And if it did so, how exactly were the guidelines incorporate and adopted in the contents of the Plan, including the maps? If would be obliged if responses to those questions were provided by the Council to me, in its respond to my submission.
- Did WCC make any ministerially-prescribed Planning Guidelines available to the public at any stage during the preparation of the Draft Plan; and if so, when and where? And if not, why not?

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<sup>1</sup> **The Guidelines state (pg. 4):** *"1.3 Status of the Guidelines. The Minister for the Environment, Community and Local Government has issued these Guidelines under section 28 of the Planning and Development Act 2000-2012. Planning authorities and An Bord Pleanála are required to have regard to the guidelines in the performance of their functions under the Planning Acts."* [my emphasis]

### 3. Proposed Objectives

#### Cross-boundary issues

There is little evidence in the Draft or elsewhere of collaboration or it fails to take a joint approach between Wicklow Co. Council and its neighbour to the north, Dún Laoghaire-Rathdown County Council. This is unfortunate, as it seems to ignore some obvious opportunities for a joined-up approach that would advance sustainable, holistic planning in the north Leinster sub-region of the GDA (Greater Dublin Region), particularly with regard to Blue-Green Infrastructure, Coastal Zone Management, Climate Change Adaptation, Transport and Biodiversity. There is legal provision for cross-boundary collaboration within the Planning and Development Act, 2002 (as amended).

### 4. Proposed Land Use Zonings

#### Kilruddery Demesne and SCR / Hollybrook / Swanbrook

- Kilruddery is one of the nation's finest man-made, Designed Landscapes, a vital cultural and natural heritage - Kilruddery estate. In a European, Leinster regional and Bray local context, Kilruddery estate and its adjoining landscapes, on the doorstep of populous Great Dublin Area - are a highly significant cultural, social and economic resource. **Maintaining the integrity of the estate is a key challenge for partnership between the landowner, local community and planning authority. Re-zoning lands for housing is the thin edge of the wedge and promotes an outmoded model of developer-led local area planning that contradicts modern advances in public policies at Irish and European levels.**

Proposed re-zonings to rear of industrial park, Hollybrook and Swanbrook are misplaced not in accordance with sustainable development and best planning practice, in respect of safety, flood risk, Green Infrastructure, traffic management and conservation of the Kilruddery Demesne. There is no reasonable or comprehensive analysis of likely negative environmental and social impacts. No traffic modelling included in LAP or supporting documentation: this is particularly relevant to the Kilruddery rezonings vis-a-viz the over-capacity situation at the Southern Cross Route, which is likely to experience a substantial increase in traffic volumes, not only arising from planned development at Kilruddery, but also in the wider hinterland such as the Grtystones Marina development, currently under construction. In addition, the proposed access and egress from this re-zoned land is unclear and such ambiguity represents a sub-standard approach to the proper planning of the area.

- If the housing density is approved, all that will be achieved is having another housing estate built off the Southern Cross Road which in turn will create more sewerage, water lighting

facilities being required as well as creating traffic issues. This proposals is not "sustainable progress for the environs of Bray town", for which WCC's should be to:-

- · promote Bray as a regional centre of economic, social, cultural and ecological growth;
  - · ensure an adequate supply of zoned and serviced land is provided, to meet anticipated development needs;
  - · consolidate the urban form of the town through:
  - · *promoting the use of under-utilised physical and social infrastructure via the redevelopment of brownfield and derelict sites;*
  - · *promoting a more intensive use of existing residential, community and industrial stock, via the promotion of increased densities, 'Living Over The Shop' (LOTS), infill housing and development of employment zoned areas;*
  - · *regeneration of declining residential and industrial areas.*
  - · *retain the town's population through providing a sufficient amount of affordable residential units in the town, and facilitating the development of infrastructure, services, employment and social opportunities to meet the needs of the population;*
  - · *reduce the demand for travel and support the development of sustainable modes of transport;*
  - · *promote sustainable land use and transportation objectives through promoting the development of neighbourhood centres and mixed use developments, and through increasing accessibility to public transportation and integration between transport modes.*
- The town of Bray and its southern peri-urban edge will be most affected by the proposed modifications in respect of Kilruddery estate. Wicklow County Council should have strong regard to applying the above bullet-list of policies as priorities in the Draft LAP. This traffic congestion not only creates problems on the Southern Cross Road itself, causing delays to residents and local businesses not only at peak times, but more seriously when there is any kind of a pressure traffic incident on the N11, the entire Southern Cross becomes gridlocked, and this is a serious safety risk in terms of emergency services access. Further development would exacerbate the existing problem unless addressed.

## 5. Summary - Suggestions

- General - Development Sites and Zonings (Chapters 10, 11)

- Restrain, prevent urban sprawl and Regenerate: rejuvenation the many industrial and derelict, abandoned sites/areas (Boghall Road; Killarney Rd., \*

Revise draft Objectives and Zonings to re-balance towards more high-density residential and enterprise on mixed and single-use sites, e.g. Dell, A.O Smith, Industrial Yarns, Little Bray - and have been in decline over the past 5 years. We have a number of sites such as the Dell Site, the AO Smith site, the APC site and others that are in need of redevelopment and regeneration. These brownfield and derelict sites should be prioritised and redeveloped before we look at zoning or developing any greenfield sites.

➤ **Blue-Green Infrastructure - Amenity, Recreation Open Spaces and Residential Zonings**

- **Charnwood/Giltspur Wood - Swan River**: rescind proposed re-zoning of two parcel of riparian lands - current Open Space (OS4) in Bray Town Plan 2011-17 - retaining that current land-use zoning and retaining the current, Greenway objective in full, for the entire Swan River corridor (Herbert Road to Boghall Road; finally implement (fund, invest and maintain) in partnership(s) with local community and other local stakeholders); potential funding sources include WCC Capital Levies Scheme, T.I.I (cycleway programme), Local Government Fund, Dept. of Transport Smart Travel.

- **River Dargle - Rehills**: rescind proposed re-zoning of MU f riparian lands - current Open Space (OS4) in Bray Town Plan 2011-17 - as too costly in engineering and development terms (requires intrusive in a flood-prone river valley , refs OPW CFRAM maps) and negative environmental impacts (biodiversity loss, trees loss, erosion, etc.)

- Expanding OS designations to fully cover the entire river basin, providing basis for a large riparian, naturalistic Pubic Park, as a key link in the Blue-Greenway chain from Bray Harbour/Cliffs to Enniskerry and beyond.

- **Kilruddery Demesne/SCR**: rescind proposed residential and commercial-industrial zonings, except for proposed Open Space greenway corridor linking Hollybrook to the foot-slopes of the Little Sugar Loaf in Kilruddery. And, in finalising the Draft Plan, include a new objective regarding the future planning, conservation and management of the entire Kilruddery estate and demesnes (KD-Conservation & Tourism Zone, plus landholdings on Bray Head and L. Sugar Loaf); in the context of an expanded geographic scope of the Plan, embracing all former Bray Environs' land parcels (as per suggestion above)

➤ **Chapter 7 Tourism & Recreation Objectives**

KD - Kilruddery Demesne - include a new objective: WCC to support, facilitate and develop a comprehensive Landscape Estate Masterplan - in full collaboration with the landowner, local

community and other key statutory and non-statutory stakeholders for the future (2018-2028), sustainable development of the entire landholding (core estate, Little Sugar Loaf and Bray Head).

- The Masterplan would be a sub-threshold, non-statutory Framework Plan, demonstrating authentic partnership between landowner, community and planning authority; building consensus aimed at stewarding the estate in a successful economic and social future.
- There is precedent for such an initiative: the Kilruddery landowners - the Brabazon family - commissioned a more modest develop plan by Murray O'Laire Urban Designers approximately 10 years ago. The Guidelines and Manual for LAPs also provide useful advice and mechanisms for such a progressive approach.

➤ **Chapter 7 and Chapter 9 [S.9.3 G.I Objectives]**

Include a new objective for a **Cross-boundary Coastal Blueway Project between WCC and Dlr**: to construct a sub-regional Blue-way between Killiney-Shanganagh Beach and Bray Harbour - Esplanade

- **Potential Funding Source**: Development Levies Schemes (WCC and Dlr) and EU Structural and EU LIFE-Nature grant schemes; E.I.B (European Investment Bank) €128million EU-wide Green Infrastructure-Biodiversity Programme; Fáilte Ireland tourism funding (Ireland's Ancient East); T.I.I (cycleway programme).
- **Justification**: local economy (eco-tourism: SME's - tourism and heritage guides/entrepreneurs, cafés, bike hire companies, etc.), Biodiversity action/All-Ireland Pollinator Plan, Smart Travel (cycling/walking), Climate Adaptation and Coastal Zone Management (resilience, cliff erosion management and reduction), Health & Well-being (active recreation, sports, leisure) and quality Blue-Green Infrastructure (amenity, eco-system service, etc.)
- **Planning objectives**: project would amplify and substantially enhance the Draft Plan's (7.2 Bray Harbour, pgs. 40-41) re-development policy statement/objectives, and thereby give real practical delivery of both WCC's county & Bray G.I Strategy & Objectives and neighbouring Dlr Green Infrastructure Strategy [7] (see following Appendix C - Coastal Corridor Map), in respect of greenways, cycling, walking etc; with the L.E.C.P, Wicklow Outdoor Recreation Strategy and the Wicklow Tourism Strategy.
- Planning law: Section X, Planning & Development Act 2000 (as amended)

**Chapters 7, 9, 10, 11 >> Blue-Green Infrastructure - Open Space Audit & Strategy**

Include a new objective to undertake a comprehensive Open Space Strategy using U.K Best Practice Guidance (not specific planning or other guidance in RoIreland for Open Space Strategies). U.K city municipalities (e.g. Newcastle, Liverpool, Glasgow, Sheffield) and Dlr's Open Space Strategy 2011-2015 provide useful models, particularly in using PAN65 Planning Guidance, with 3-stranded Audit and Assessment Methodology - Quantity, Quality and Assessment, mirroring Department of Housing, Planning, Community & Local Government's general planning guidance on the provision of Open Space [3].

- The brief for any such audit research and O.S Strategy should focus on addressing the deficiency in open space and recreation provision and future needs, in the geographic area of the Municipal District and Urban Settlements of north Wicklow:-
  - *Strengthen the spatial linkages between Bray and its environs.*
  - *Provide an integrated approach to Blue-Green Infrastructure, Flood and Stormwater Management, Recreation, Sports-Leisure, Eco-Tourism, Land use, Smart Travel (cycling, walking, etc.).*
  - *Provide guidance for the integration of the natural and built environment in Development Management (standard conditions, etc.)*
  - *Provide an implementation strategy for Provision, Upgrading, Design and Maintenance of active, passive and natural Open Spaces .*

See also: -

Refs. [7]. [8] and Appendix B.

## APPENDIX A | References

- [1] 'Putting People First - Action Programme for Effective Local Government'. 2012. Dept of Environment, Community & Local Government, Dublin 1.
- [2] Local Area Plans - Guidelines for Planning Authorities. June 2013. Dept of Environment, Community & Local Government, Dublin 1.
- [3] Manual for Local Area Plans. A companion document to the Guidelines for Planning Authorities on Local Area Plans. June 2013. Dept of Environment, Community & Local Government, Dublin 1.
- [3] Sustainable Residential Development in Urban Areas (Cities, Towns, Villages). Guidelines to Planning Authorities. May 2009. Dept. of Environment, Heritage & Local Government.
- Pope Francis I. 'Laudate Si' Chapter 3, The Human Roots of the Ecological Crisis's, III The Crisis and Effects of Modern Anthropocentrism.115-123 (p.62-65)8
- [4] 'A Better Quality of Life for All'. General Election Manifesto. Feb. 2007 Irish Urban Forum (ILI, RIAI, EI, IPI, SCSI), Dublin, Ireland.
- [5] Pope Francis I. 'Laudate Si' Chapter 3, The Human Roots of the Ecological Crisis, III The Crisis and Effects of Modern Anthropocentrism.115-123 (p.62-65)8
- [6] Planning and Urban Design Standards. Part 1: Plans and Plan Making. American Planning Association.. 2007. Wiley Graphic Standards. John Wiley & Sons.
- [7] Dlr County Council's Green Infrastructure (G.I) Strategy 2016-2022 Dún Laoghaire-Rathdown County Council, Planning and Parks & Landscape Services depts., Dublin, Ireland. ([www.dlrcoco.ie/files/devplan2016\\_2022/media/pdf/Appendix\\_14.pdf](http://www.dlrcoco.ie/files/devplan2016_2022/media/pdf/Appendix_14.pdf))
- [8] How cities use Parks : for Green Infrastructure, for Climate Change Management, to Create Safer Neighborhoods, to Improve Public Health, for Community Revitalization, for Economic Development, Promote Tourism . City Parks Forum Briefing Papers series on how cities can use parks to address urban challenges. American Planning Association, Chicago, IL USA\_www.planning.org/cpf

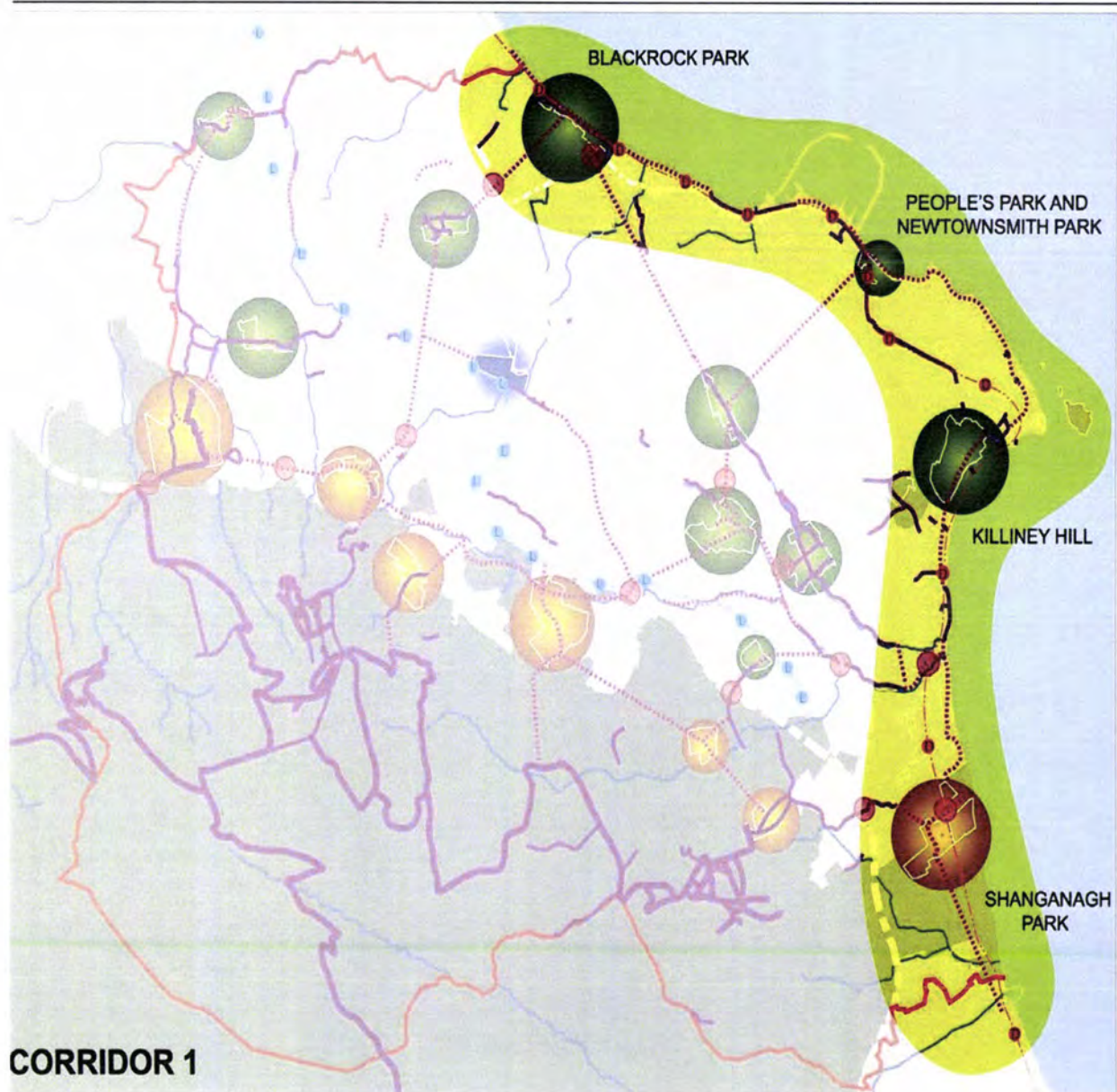
## APPENDIX B | Further Sources of Information

- *Design for Ecological Democracy*. Randolph T. Hester Jr., Professor Emeritus of Landscape Architecture & Environmental Planning at UCC Berkeley, CA, USA. Hester researches the role of citizens in community design and ecological planning, with special interest in stewardship.
- *The Essential Ian McHarg: Writings on Design and Nature* \_ed. Frederick R. Steiner\_ Island Press, Washington D.C, USA. 2006.
- *'City Parks are a Smart Investment for America's Health, Economy, Environment'*. City Parks Alliance, Washington DC, U.S.A. October 2016.  
[www.cityparksalliance.org/storage/documents/Action\\_Center/Smart\\_Investment\\_Health\\_Economy\\_Environment\\_-\\_FINAL.pdf](http://www.cityparksalliance.org/storage/documents/Action_Center/Smart_Investment_Health_Economy_Environment_-_FINAL.pdf)
- *'The Value of Green Infrastructure. A Guide to Recognizing its Economic, Environmental and Social Benefits'*\_CNT, American Rivers, USA\_2011
- *'Making the Links. Greenspace and the Partnership Agreement*. Greenspace Scotland. March 2005. [www.greenspacescotland.org.uk](http://www.greenspacescotland.org.uk)
- *National Landscape Strategy for Ireland 2015-2025*. Dept. AHG, Dublin.  
([www.ahg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf](http://www.ahg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf))
- *Planning and Development Policy and the Recession in Ireland*. Brendan Williams. School of Geography, Planning and Environmental Policy, University College Dublin, Ireland. p.441-445 in *Planning and the Recession, Planning Theory & Practice*, LBertolini , AWenban-Smith , MRobiglio , BWilliams, Evan der Kooij\_2011)
- *'A Manifesto for Irish Landscapes'*\_ Irish Landscape Institute, Dublin. April 2007
- *Green Infrastructure in Ireland*. COMHAR (National Sustainability Council). 2010. Department of Environment, Heritage & Local Government, Dublin 1.
- *Irish Planning: is there a way back from catastrophic failure?* Aoife O'Grady. 1 April 2013.  
[www.irishenvironment.com/commentary/aoife-ogrady-irish-planning-is-there-a-way-back-from-catastrophic-failure/](http://www.irishenvironment.com/commentary/aoife-ogrady-irish-planning-is-there-a-way-back-from-catastrophic-failure/)
- *Lessons learned? Ireland's property love affair continues*. John Spain 29 January 2015.  
[www.irishcentral.com/news/irishvoice/Lessons-learned-Irelands-property-love-affair-continues.html](http://www.irishcentral.com/news/irishvoice/Lessons-learned-Irelands-property-love-affair-continues.html)
- *York natural flood defence measures receive boost from Prince Charles. Measures that kept Pickering dry over Christmas likely to be echoed to help protect one of Britain's most flood-prone cities*. Geoffrey Lean. The Independent newspaper, 20 February 2016.
- *'Urbanism in the Age of Climate Change'*. Interview with Peter Calthorpe, Calthorpe & Associates, about his book Island Press, 2011 \_ ([www.calthorpe.com](http://www.calthorpe.com)).
- *Urban green spaces and health. Reviewing the evidence*. 2016. World Health Organisation, United Nations- Europe. Copenhague, Denmark.



## APPENDIX C

Dir GREEN INFRASTRUCTURE STRATEGY - [Extract]: Corridor 1 | Coastal including Killiney to Bray Harbour (Dún Laoghaire-Rathdown County Council CDP 2016-2022)



### 3.3.1 Corridor 1 - Coastal

*Shanganagh Park – Killiney Hill – Newtownsmith Park – People's Park – Blackrock Park*

Shanganagh Park is proposed as a Gateway Park as it is situated in a key location for commencing the coastal route. Blackrock Park is a regional park, which is also in a key location for introducing the coastal route and connecting with the intra urban and rural corridors. This corridor extends into surrounding counties; Dublin City to the north and Wicklow County Council to the south.

From a Green Infrastructure perspective the principal role of this corridor is to connect open space and recreational assets. It also links into a large number of local parks and Greenways and cycle routes. It has four major hubs, which provide connections with other GI corridors, at Shanganagh Park, Killiney Hill, Newtownsmith Park and Blackrock Park. The terrain and its urban nature has resulted in a corridor which utilises low traffic cycle routes, and as such has limited scope for habitat creation and continuous green corridors. The use of Green Street concepts would improve the green attributes of this route in a distinctively urban environment. They would also assist in the reduction of surface water flooding along this coastal route. The majority of the elements for this route are in place and the S2S promenade and cycleway and the East Coast Trail route, have the potential to become a key piece of the jigsaw.

#### Objectives

1. To provide a coastal corridor that connects a number of regional parks and iconic recreational sites within the County and extends into the surrounding administrative boundaries.
2. To improve visitor experience and increase duration of stay by providing a wide range of transport options and linkages to a choice of parks.
3. To provide a multi-functional GI corridor crossing and connecting the mountain, urban area and coast and linking with other corridors.

**Leonora Earls**

---

**From:** Fi Fitz  
**Sent:** 13 September 2017 19:58  
**To:** Planning - Plan Review  
**Cc:** Cllr. Steven Matthews; Cllr. Pat Vance MCC; Cllr. Michael O'Connor; Cllr. Joe Behan; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Jim Ruttie MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Pat Fitzgerald MCC; Cllr. Mary McDonald; Cllr. Tommy Annesley; Cllr. Oliver O'Brien; Cllr. Pat Kennedy; Cllr. Miriam Murphy; Cllr. Brendan Thornhill; Gail Dunne; Cllr. Jennifer Whitmore; Cllr. Irene Winters MCC; Cllr. Edward Timmins MCC; jryan@greatplacetowork.ie; Cllr. Tom Fortune MCC; Cllr. Christopher Fox MCC  
**Subject:** Objection to planning - road across Little Sugar Loaf

From Fiona Fitzgerald, 25 Bremen Rd, Ringsend, Dublin 4.

I am emailing to object to the council's plans for the road across the Little Sugar Loaf. I understand that the roadway proposal is contrary to the vision and goals of the Wicklow County Development Plan 2016-2022. I object to proposed rezoning of land.

Regards  
Fiona

**Sorcha Walsh**

---

**From:** Geraldine Flanagan [c]  
**Sent:** 15 September 2017 17:01  
**To:** Planning - Plan Review  
**Subject:** Current TPO in Bray  
**Attachments:** IMG\_6953.PNG; ATT00001.txt

#### 8.4.4.2 Tree Protection

***It is the policy of the Council to protect trees, in particular native and broadleaf species, which are of conservation, and/or amenity value.***

The Council will seek to preserve and enhance the amenity of the town by preserving in so far as possible, that part of its appearance attributable to trees, woodlands and hedgerows. In accordance with the requirements of Part XIII, Section 205 of the Planning and Development Act 2000, Bray Town Council has implemented Tree Preservation Orders with a total of 17no. areas within the Bray Town Council area; these are identified in Table 8.2 below. The rationale behind the making of these orders is the preservation of the amenity value that the trees collectively offer.

Table 8.2

No.	Tree Preservation Order
1	Kilbride Lane
2	Violet Hill
3	Brook House School and Killarney Glen, Herbert Road
4	Ballywaltrim Grove, Killarney Road
5	Oldcourt House and Vevay House, Swan River Valley
6	Grounds of Loreto Convent, Bray
7	Grounds of Presentation College, Bray
8	Bray Head
9	Duncairn Terrace
10	Swan river valley to Bray Bridge (The Maltings)
11	Small woodland and Ecclesiastical remains, Fairyhill Housing Estate
12	Florence Road
13	Ballywaltrim Lane
14	Entrance to Elgin Wood, Killarney Road
15	Wooded slopes East of Dargle River
16	Wooded slopes from St. Valery's Bridge to Kilbride Church
17	Ledwidge Crescent

The Council will discourage the felling of mature trees to facilitate development, and will encourage tree surgery rather than felling where possible. Development that requires the felling of mature trees of special interest, even though they may not be listed in the Development Plan, will be discouraged. The Council will require existing mature trees that are worthy of preservation to be incorporated into any proposed development, where this is appropriate. In such cases, development to be occupied by people will not be permitted within falling distance of such trees.

49 Giltspur Wood  
Bray  
Co Wicklow  
7 September 2017

C121

Administrative Officer  
Planning Section  
Wicklow County Council  
Station  
Wicklow Town

BRAY MD LAP



Dear Sir/Madame,

I wish to raise my objection to the proposed rezoning of the lands at Oldcourt Castle in Bray, Co Wicklow. I feel for the small number of houses which will eventually be built the upheaval, disruption and dangers far outweigh the benefits of future housing within these areas.

The fact that the access to this area would mean breaking through an existing cul-de-sac is not acceptable. Is this to become the norm or expected???? People purchase houses in cul-de-sacs for good reasons and do not expect them to become through roads. In addition people purchase houses in small housing estates and do not expect them to be extended, where are the limits?

We have already had an extension to Giltspur Wood in the past and there were several problems with heavy machinery and trucks running through a crowded residential area, damage to cars and road surfaces not to mention kids playing on the construction site and accidents including a broken arm and a head injury. We do not want a repeat of this.

There are several other reasons why I think this rezoning should not go ahead

Firstly the new traffic system in place on the Oldcourt Road along with the new houses recently built has already increased the traffic exiting from Oldcourt Park onto the Killarney Rd. The fact that there is now only one route for the traffic means that there are long delays at the Oldcourt Park /Killarney Rd junction and results in people waiting through several changes of traffic lights and in turn leads to frustration and the breaking of lights which endangers children crossing at the pedestrian lights. I have experienced this first hand while walking my kids to school. The green man comes on and the traffic is still rushing through the junction. This is extremely dangerous. Kids tend to just run across when they see the green man and not look for cars that are potentially breaking the lights. We do not need additional traffic on these local roads which are already unable to cope.

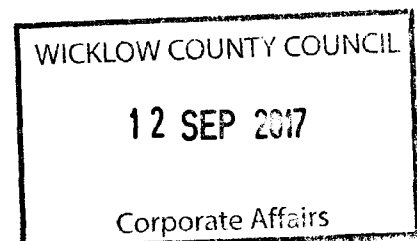
Oldcourt Castle in a protected building and to encroach on this would be detrimental to its historical value. Apart from the obvious negative effect of losing green space and the wildlife which it sustains there are preservation orders on several trees on the land in question and items of historical value including a Baptismal font pre-dating the 15<sup>th</sup> Century Castle.

I hope this objection and the objections of the other residents will be considered seriously.

Yours Sincerely

A handwritten signature in cursive script, appearing to read 'Grainne Flavin'.

Grainne Flavin –



**Grainne Flavin**  
**49 Giltspur Wood**  
**Bray**  
**Co Wicklow**

**Home Phone :**

**Mobile :** ---

## Leonora Earls

---

**From:** John Flynn [mailto:john.flynn@kildare.ie]  
**Sent:** 13 September 2017 12:23  
**To:** Planning - Plan Review  
**Subject:** Kilmacanogue area plan

Submission in relation to Kilmacanogue Local Area Plan.

I would ask the council not to zone and current Greenfield land in the environs of Kilmacanogue until it is in public ownership

The last **major** rezoning for residential land in Kilmac was the lands at Rocky Valley crescent. A group of business people sat on this land for years until it was ready for development and sold it for 26 million. Consequently **not a single local person was able to purchase a house in the development.**

The minor rezoning of land at Kilmurry resulted in the following. The land owner here purchased the land without a zoning and paid a non-zoned price. He then sold off the rezoned land with windfall profits. These windfall profits are paid from a millstone around the necks of young families who will be paying off the debt for the next 30 years.

What should have happened here is that that land should have been purchased by the council prior to any rezoning and any windfall from rezoning should go back to the council.

This also allows for better planning of land use and provides funds for spending in the community. All that happened here is that a land speculator became very rich at the expense of young people trying to house themselves.

There needs to be joined up thinking going forward between the various council departments. The 20 houses proposed for Rockfield Park are a drop in the ocean in terms of the demand for housing in the near future.

What does this mean in practical terms? If the Council's proposed rezoning of the land at the bottom of the little Sugarloaf goes ahead, this bestows a financial windfall for whoever owns this land when they sell it off to developers. What happens then? Houses are built that local people cannot afford to buy, just like Rockvalley Crescent.

It is time for council executive and elected representatives to show leadership.

- Either the council purchases this land now (unzoned) and only then zones this land and then either directly or indirectly allows for the orderly development of appropriate affordable public and private houses and community facilities. (not 3000 square foot mansions like Rockvalley Crescent)
- Or if council insist on zoning the land only that really robust conditions attach to who should be allowed to purchase these houses. I.E. genuine local people with a housing need. If the local only condition is robust enough, this should dampen the value of the land and make the houses affordable. A weak condition such as people living or working in the county for a year will not be sufficient to prevent the squeezing out of locals.
- Another alternative is to do as they do in France. The local town mayor controls the land on the edge of towns / villages and sells off individual serviced sites to locals when they need them. It is not unusual to see a mini housing estate built over a twenty year period in an orderly manner under this system. This is done in France to avoid the pressure for one-off housing in the countryside which is not sustainable. Another advantage of this system is that it provides an opportunity for young people with initiative to house themselves at a much cheaper cost by utilising their own talents and skills in building the house.

All above potential actions are perfectly lawful once acting in the 'common good'

What I am saying here is nothing new and these actions were recommended to local authorities as far back as 1070's in the Kenny report on land use.

To conclude

I don't know anyone I went to school with 40 years ago in Kilmacanogue who has managed to purchase a private house in the village. Those of us privileged enough to be able to stay in the area either inherited a site a house, money or obtained a council house. Building one off houses on family land has acted as a pressure release valve for the fortunate ones of our generation but is not a sustainable solution in the long run.

It is time for the council executive and public representatives to step up to the plate and take concrete measures to allow local people to continue to live in their local area.

Regards

John Flynn



**Leonora Earls**

---

**From:** John Flynn [ ]  
**Sent:** 15 September 2017 12:51  
**To:** Planning - Plan Review  
**Subject:** submission in relation to Kilmurray Kilmacanogue settlement area boundary - Proposed Bray Municipal district LADP  
**Attachments:** 20170915113945506.pdf

submission in relation to Kilmurray Kilmacanogue settlement area boundary

I wish to request that the council consider a slight revision to the settlement boundary as per attached map.

The eastern boundary seems to be set by a line parallel to the motorway which means the boundary crosses the middle of existing established boundaries.

A more sensible boundary would be to follow the line of the existing field divisions which only involves a minor movement of boundary 5m average to the east.

Regards

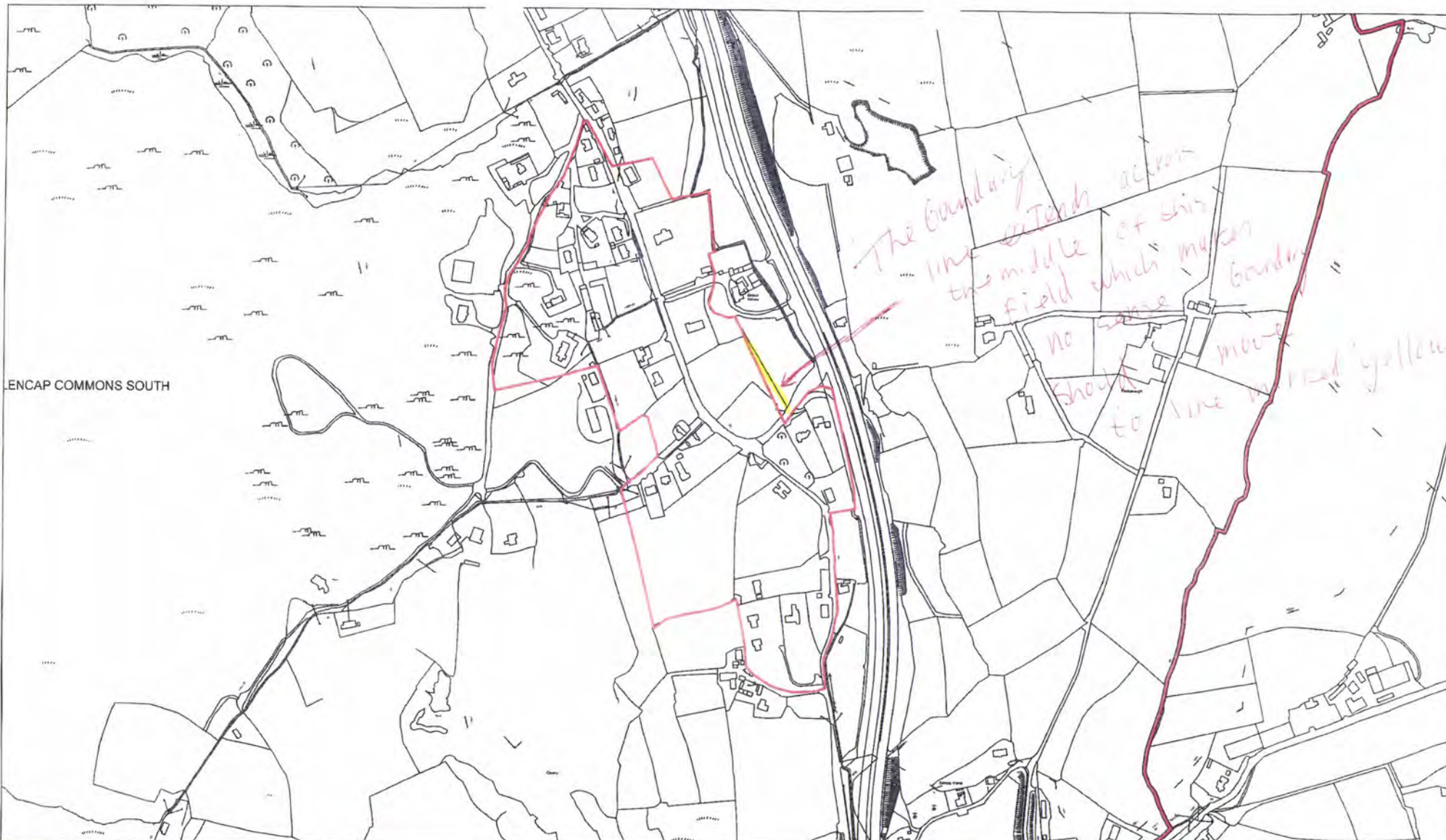
John Flynn  
HSE Estates  
Mobile

-----Original Message-----

**From:** [ricohscannerengineeringbasecoh@hse.ie](mailto:ricohscannerengineeringbasecoh@hse.ie) [<mailto:ricohscannerengineeringbasecoh@hse.ie>]  
**Sent:** 15 September 2017 10:40  
**To:** John Flynn  
**Subject:** Message from "RNP00267386D5D4"

This E-mail was sent from "RNP00267386D5D4" (MP C2503).

Scan Date: 09.15.2017 11:39:45 (+0200)  
Queries to: [ricohscannerengineeringbasecoh@hse.ie](mailto:ricohscannerengineeringbasecoh@hse.ie)





WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District  
Local Area Plan  
2017**

LAND USE ZONING MAP **DRAFT**

Title: Kilmurray  
Map No. : 5

 Municipal District Boundary  
 Settlement Boundary



Wicklow County Council  
Planning Department

Maps are not to scale

Ordnance Survey Ireland. All rights reserved.  
Licence Number 2017/55/CCMA/Wicklow County Council

## Leonora Earls

---

**From:** Pat Flynn  
**Sent:** 01 September 2017 21:13  
**To:** Planning - Plan Review  
**Subject:** bray local area plan

C124

I wish to oppose this plan in its entirety for the reasons below.

1 As a resident of Hollybrook Park for 20 years or more, I'm appalled at the notion of implementing change to the estate ie making an entry to Killruddery Estate thro Hollybrook Park with all of the unwanted traffic, noise, and general inconvenience to the residents. Car parking already difficult will be a major problem.

2 Proposed housing on the lower part of the Small Sugar loaf will be a disaster due to flooding, residents are currently faced with major difficulties in this area due in no small way to poor planning in the past. A number of vacant sites in the area would surely have offered an alternative to that being considered - Dell, Sheering Plough and A O Smith for example.

Traffic, already a nightmare will become a disaster, trying to exit our estate in morning peak times is lethal, particularly if trying to turn right on the school run. A major accident it seems will be necessary before steps are taken to make egress safe for all.

4 We the residents have become the Forgotten people of the Southern Cross Road we have no access to services, no proper bus service. no nearby shops or Doctor/Pharmacy. We maintain our estate as best we can through our resident association and pay a yearly subscription for the privilege.

5 In conclusion. Come on do the right thing listen to those whom you have been chosen to represent. Generations of children will be glad you did.

Is mise

Patrick Flynn

**Leonora Earls**

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**From:** Paul Flynn [  
**Sent:** 14 September 2017 15:00  
**To:** Planning - Plan Review  
**Subject:** SUBMISSION draft LAP 7.4 The Dargle River Walk

Dear Sir or Madam,

I want to make a submission regarding the Bray Municipal District Local Area Plan 2017.

I live on the Upper Dargle Road, Bray and my property backs onto the River Dargle. After the vegetation was removed along the riverbanks for the Flood defence scheme there was an increase in the number of people trespassing on the riverbank. Since the security measures were put in place for the flood defence scheme there has been a considerable drop in trespassers. My concern is that with the promotion of the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, that there will be a large increase in the amount of anti social behaviour. With opening up access to the general public to the back of the houses that face the river, it will prove to be a serious security risk to the residents in the area.

I ask that if the river walk is to go ahead, that measures be taken to ensure the security of the residents by installing high security fencing, which will be adequate in preventing the burglary of the houses along the river. I know that the plan is for a riverwalk along the South bank but the houses on the North river bank are easily accessed by crossing the shallow river in summer.

#### *7.4 The Dargle River*

*Along the River Dargle, the following objectives shall apply:*

*To promote the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, through the development of a Dargle River Walk along the south bank of the river.*

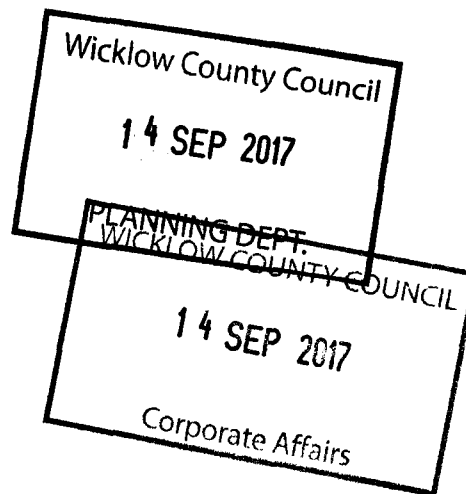
Regards

Paul Flynn  
Doughcrew  
Upper Dargle Road,  
Bray Co. Wicklow  
A98A371

Fergal & Linda Foley  
47 Giltspur Wood  
Bray,  
Co Wicklow

08/09/2017

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



Ref: BRAY MD LAP

Dear Administrative Officer:

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

**a) Health and Safety**

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

**b) Traffic Congestion**

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

**c) Flood Risk**

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

**d) Tree Preservation Order**

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

**e) Wildlife**

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

**f) Protected Structures**

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

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

Sincerely,

A handwritten signature in black ink, appearing to be 'Fergal Foley', written over a horizontal line.

Fergal Foley

**Leonora Earls**

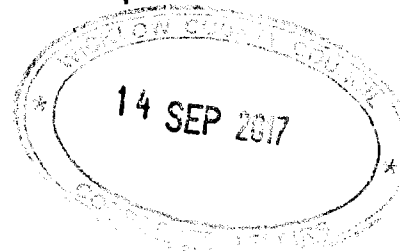
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**From:** Phyl Foley  
**Sent:** 08 September 2017 23:29  
**To:** Planning - Plan Review  
**Subject:** Kilruddery Rezoning

I wish to oppose the rezoning of Kilruddery Estate on Little Sugarliaf for housing and rezoning .i live in Hollybrook Park and my garden in the best of weather is a swamp and when there's heavy rain it is overflowing into my house ,this is a major concern plus the traffic congestion morning and evening is soul destroying .There is no public transport from Southern Cross into Bray ,no public bins ,no local amenities ,.I fear the outcome when 240 new more houses are in the pipeline for rezoning ,I also feel the wonderful setup Kilruddery are trying to achieve will be killed and Kilruddery is a massive asset to Bray financially and also puts Bray on the map ...why ruin this wonderful asset both for residents n tourists .I conclude by objecting fully to this proposition and hopefully this nightmare idea will not happen .Phyl Foley ,Hollybrook Park .

Miriam & Chris Gallagher  
 53 Giltspur Wood  
 Bray  
 Co. Wicklow  
 13th September 2017

Administrative Officer  
 Planning Section  
 Wicklow Co Council  
 Station  
 Wicklow Town



Dear Administrative Officer,

**BRAY MD LAP 2017**

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

**A) Health and Safety**

- To gain access to the field would require breaking through an existing, safe and child friendly cul de sac which has been a 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 rezoned 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".



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ife.

**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.

Yours sincerely,

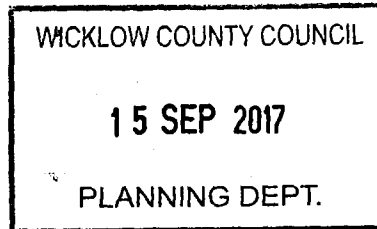
**Miniam & Chris Gallagher**

C129

80 Mountainview Drive  
Boghall Road  
Bray  
Co. Wicklow

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

Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town



Re: Bray MD LAP

Dear Sir,

Enclosed please find submission for the Bray Town Development Plan 2017/22.

Yours faithfully

*Bob Galvin*

Bob Galvin

The citizens of the east coast cherish natural beauty and history of Bray Head, small Sugarloaf and the big Sugarloaf Mountains. Every day those travelling to and from the M50 and Dublin by car, bus or train embrace these views that are uplifting to the mind and soul. The visitors that we encourage to come to our county for holidays we promise them natural beauty of our land and sea, the history and culture that make us who we are. In return the visitors spend their cash on the tour buses that take them around Wicklow stopping to have a meal and shop in Avoca Hand Weavers and finish with a pint and some Irish music in a pub. This is but a snapshot of how the countryside provides local jobs for local people. The bus driver, chef, barman and other will return to their homes and families in Wicklow. Where those homes are is important the balance of work place and home must be in sympathy with the natural environment to continued prosperity.

The history of the area and the Brabazon family goes back to the 1600s. Kilruddery House should not be viewed as the house and gardens but within the context of the landscape of the entire area that is Bray Head, small Sugarloaf and big Sugarloaf Mountains. The Wicklow County Council should do everything in its power to keep this area in tact rather than break it up into different area plans. To encourage this Wicklow County Council should rent the land and plant forestry. The land owner would receive an income. The County Council would benefit from the forest as the trees would soak up the rainwater reducing run off, the trees breathe in carbon monoxide which reduces emission from cars on the N11. The forest would provide opportunities for recreational facilities and provide an income to the County Council on the maturity of the forest.

#### **New Houses**

New residential housing on the small Sugarloaf should not be considered at this height as it would spoil the views currently enjoyed. Kilruddery house and gardens should be viewed in the context of Bray Head small Sugarloaf and big Sugarloaf.

#### **Flood Management**

The Dargle flood works are nearly finished, but before the contractor leaves, Wicklow County Council should install safety ladders at either side of Bray main street bridge in the interest of public safety. If a person fell into the River Dargle at present it is not possible to get out due to the high walls and where there is a grass bank, they cannot exit as there are high railings preventing exit.

Like Kilruddery there must be a holistic approach to the town of Bray having the biggest population in Wicklow. Establishing the Wild Atlantic Way as been very beneficial to the West Coast and it is time Bray's green ways are brought together to establish a walking and cycle way from the Dargle River, through the centre of Bray following the path of the Swan River to exit at the Southern Cross (See 2011/17 Bray Town Plan Map Ref OS4). Children and families could cycle to and from schools. Adults and students could walk or cycle to work in Bray or to the train stations without interacting with cars or other traffic.

#### Swan River

The Swan River as designated OS4 Bray Town Development Plan 2011/17 is a liner green belt running the length of the river from Herbert Road in the North to the Southern Cross South of Bray Town. The Banks on either side of the river forms a flood plain which over the years has flooded and caused damage to different estates. The other purpose for this green space is to create a green walk/cycle route with infill of trees and public lighting.

#### New Housing

The Wicklow County Council should not consider the proposal for new housing on either side of the Swan River that lies to the rear of Tesco as it would reduce the area basin for flood water. The County Council should now put in place a plan to start construction of a green pathway and cycle way for all the residents of Bray

#### OS4

This specific designation for the linear green area that is the length of the Swan River, see 2011/17 Bray Town Development Plan. In your proposal 2017/23 doc the written statement and map are not accurate to describe a river and flood plain. In the interest of public clarity revert to the wording in 2011/17 Bray Town Development Plan.

#### Traffic/Fassaroe/Bray Golf Club Lands

There is no infrastructure in place at present to accommodate additional traffic on the N11. Bray is already a bottle neck hazard in the morning and evenings. Add to this weather conditions or accident, traffic comes to a stop. With the development also at the Bray Golf Club lands the existing traffic to the M50 and Dublin will be put under additional strain on the N11 not to mention the additional traffic in the town that will be trying to get to schools, train station etc

To resolve the traffic problem it is necessary to separate M50 Traffic from N11 traffic as they converge between the Southern exit to Bray and the Northern exit to Bray, separating again at Loughlinstown flyover traffic going to Dublin while the main stream of traffic continues westerly on the M50.

As land is needed for housing and industry and the cost of a compulsory purchase of the garages and business units at Kilmacanogue would be expensive to buy as going concerns. To overcome these difficulties the Wicklow County Council should consider building a road tunnel system underground. They could follow the N11 to a point beyond Loughlinstown or could follow a westerly point under the mountains west of the N11 to a point beyond Loughlinstown. Start at Kilmurray with two tunnel boring machines to exit on the M50. Turn the two machines around and bore two tunnels back to Kilmurray. The M50 would remain a motorway and the N11 would be for Bray and Dublin traffic.

#### SAAO

In the proposed Bray Town Development Plan 2017/22 the map shown the SAAO Area is incorrect. The correct boundary of the SAAO is that it is all the way up to the rear of the houses on the New Court Road and all the way up to the rear of the houses at Briarwood. In the interest of public clarity correct this omission by reinstating the written statement and map reference OS3 as stated in the 2011/17 Bray Town Development Plan.

#### OS3

In the 2011/17 Bray Town Development Plan OS3 the map shows the area of the SAAO which is inclusive of council land. In your proposed Bray Development Plan 2017/22 the map only shows part of the land owned by the County Council. In the interest of the public clarity show all lands owned by the Council reference this with a clearly defined map of the SAAO area.

**Leonora Earls**

---

**From:** Marcin Gardiejow  
**Sent:** 03 September 2017 13:23  
**To:** Planning - Plan Review  
**Subject:** objection to the development proposed in the area on the Little Sugarloaf -Bray

To the administrative officer, Planning Section,

My Details:

Paulina Gardiejow

60 Hollybrook Park

Southern Cross Road

Bray

Co. Wicklow

mobile: 087 911 1111

I am writing to submit my objection to the development proposed in the area on the Little Sugarloaf adjoining the Kilruddery Estate.

The area is a local walkway of stunning natural beauty appearing to support considerable wildlife. It is used by people who are living locally to enjoy what is left of their natural world in the Bray Area and its development would constitute an irreversible and undesirable fundamental shift for residents in the area.

Southern Cross Road is heavily over-used with regular traffic build-up during school hours. And building 240 houses will make it worse. It would be very awkward for getting in to the schools/work places/etc.

Our beautiful natural/agricultural area will be replaced with shops, parking and an increase in population further pressing upon the limited resources of the existing community.

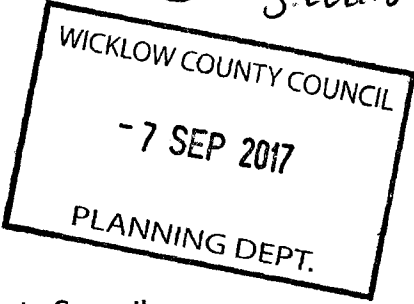
I oppose the proposed changes in the strongest terms.

Sincerely,

Paulina Gardiejow,

Local resident.

Recd by hand to S. Walsh



Sylvia Geraghty.  
C/o 9 Rectory Slopes.  
Herbert Rd.,  
Bray, Co. Wicklow.

(M) ( )

Wicklow County Council.  
County Buildings,  
Whitegates,  
Wicklow.

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

Dear Sirs,

**Re: Wicklow County Development Plan 2016-2022 [Bray Municipal Development Plan]  
Level 5: Settlement 'Town Plans' –Enniskerry [Cookstown Rd] and  
Re: Application for AA2 /R20 zoning to lands contained in Folio 5464F, Co. Wicklow.**

By way of grounding my above mentioned Application and pursuant to the Planning and Development Act 2000 as amended and the Planning Act 2010, I attach for your consideration the following;

1. Copy *Figure 6.4* from the CDP, coloured yellow, and zoned AA2, which I have duly marked **Doc 1**.
2. Copy of the Planning Permission, with non-onerous conditions, granted to P. Berridge on 11/3/16 ( Ref: 14/1704) for 26 no. dwelling units , which corresponds to *Figure 6.4*, duly marked **Doc 2** ( henceforth referred to as the '*Berridge Permission*').
3. Copy of my Site Location Map, which I have duly marked **Doc 3**.
4. Copy extract of my Folio 5464F comprising 1.230 acres, outlined in red on the attached Land Registry map and marked **35**. The adjoining area marked **32** on this map, is one and the same as CDP, '*Berridge site*', zoned yellow '*AA2*'. I have marked this **Doc 4**.
5. **Doc 5** - CDP Map No.1: '*Land Zoning Objectives*' explains that '*AA2*' zoning is '*R20 Residential*' (i.e. 20 units/ha). The same CDP Map shows my adjoining land as zoned '*existing residential*' and *within the 'Settlement Boundary'*".

6. CDP Map No.3 '*Indicative Flood Zones*' which I have marked **Doc 6** and also referring back to **Doc 2**, ('*Berridge Permission*') clearly shows, *inter alia*, that such designation would be in compliance with the town plan objective of being *settlement specific* and *achievable* in that

(i) My land is already within the '*Settlement Boundary*'.

(ii) It is zoned '*existing residential*'.

(iii) The scope and nature of the adjoining '*Berridge*' AA2/R20 Permission, now overwhelms and devalues my land as zoned.

(iv) In appearance, my land is almost an extension of the '*Berridge*' lands because the said AA2/R20 zoning, as granted, abuts too closely to my land.

(v) Both the '*Berridge*' lands and my land are of exactly similar topography.

(vi) My land is equally distant from both Flood Zones A and B and likewise, with no probability of flooding.

(vii) Given the adjoining nature of the respective lands and subject to agreement, any future development permitted on my land can easily join up to the services infrastructure, access, etc, as proposed and agreed to, in the '*Berridge Permission*'.

(viii) There are no heritage issues pertaining to my lands.

I would therefore submit that, given all of the above, the putting in place of a framework within which development can take place on my land, would be a fit and proper exercise of the role of the land use plan.

Accordingly, I wish to apply for the re-zoning of my land contained in Folio 5464 F Co. Wicklow, from '*existing residential*' to '*AA2/R20*'.

Due to my unavoidable absence abroad, I was not aware of the First round of Public display of the Draft CDP. So, I earnestly hope this will not prejudice my Application.

Should any further information be required, I can be available to attend at your offices and/or furnish any additional information or drawings you deem necessary

Thank you for taking the time to consider this matter.

Yours faithfully,

  
Sylvia Geraghty

Encl: Docs 1-6 incl.



### Action Area Plan 2

This action area is located south of the town centre, in the townland of Cookstown. This action area measures c. 9.4ha. This action area shall be developed as a residential, open space and community space in accordance with the following criteria:

- 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.

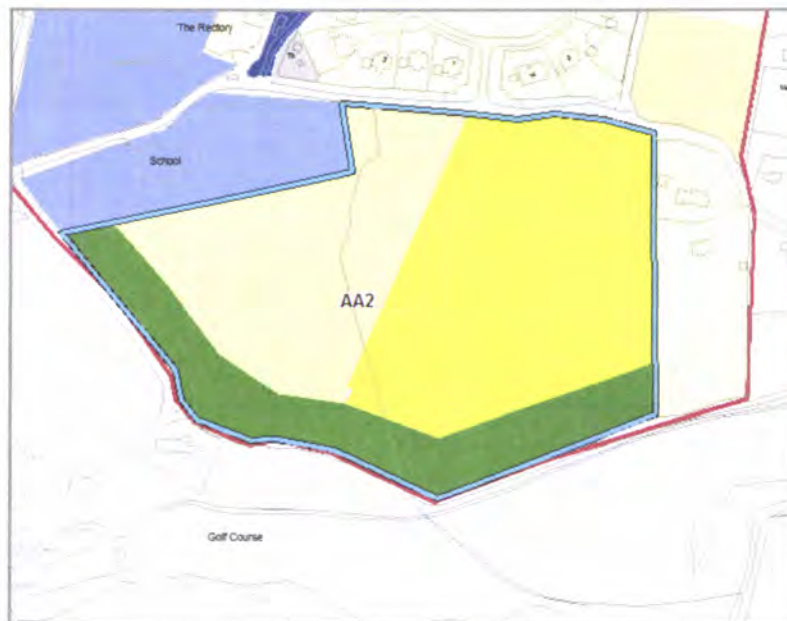
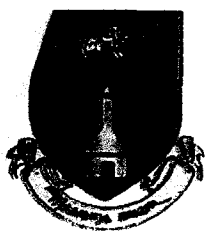


Figure 6.4 AA2



# Comhairle Contae Chill Mhantáin

WICKLOW COUNTY COUNCIL

Forbartha agus Pleanála - Planning and Development

Áras An Chontae / County Buildings  
Cill Mhantáin / Wicklow  
Guthán / Tel: (0404) 20148  
Faics / Fax: (0404)69462  
Ríphost / Email: [plandev@wicklowcoco.ie](mailto:plandev@wicklowcoco.ie)  
Suíomh / Website: [www.wicklow.ie](http://www.wicklow.ie)

## PLANNING & DEVELOPMENT ACTS 2000-2015

### NOTIFICATION OF DECISION TO GRANT

**P Berridge**  
C/o COB+P Architects  
The Studio  
Kircullen  
Kinlen Road, Greystones  
Co. Wicklow

Planning Register Number: 14/1704

Valid Application Received: 07/08/2014

Further Information Received Date: 17/02/2016

In pursuance of the powers conferred upon them by the above-mentioned Act, Wicklow County Council has by Order dated 11/3/16 decided to GRANT PERMISSION for development of land, namely:-

construction of 26 no. dwelling units, comprising of 4 no. 2 bed townhouses in a two storey block, 4 no. 5 bed two storey detached units (ranging from 260sqm-268sqm), 9 no. 5 bed two storey detached units (200sqm), 9 no. 3 bed storey detached units (125sqm) together with associated carparking, new vehicular access from the Cookstown Road, (LP-2010) and all site development, landscaping, road and boundary treatment works to site opposite Enniskerry Demesne, Cookstown (LP-1020) at Enniskerry Co. Wicklow

Subject to the 24 condition(s) set out in the attached schedule.

Signed on behalf of Wicklow County Council.

C Canterbury  
ADMINISTRATIVE OFFICER  
PLANNING & DEVELOPMENT

Date: 11/3/16

Tá an doiciméid ar fáil ar iarratas i bhformáid eile/malartach.  
This document is available in alternative formats on request.

Seoltar gach comheagrais chuig Stiúrthóir Seirbhísi, Forbartha agus Pleanála.  
All correspondence should be addressed to the Director of Services, Planning and Development.





 **SITE LOCATION MAP**  
SCALE 1:2500

Doc 4.

# LAND REGISTRY

COUNTY WICKLOW

FOLIO 5464 **F**

## REGISTER OF OWNERSHIP OF FREEHOLD LAND

C2007KW000940

### PART I—THE PROPERTY (A)

No.	Townland	Area	Barony	Reference to Plan on Registry Map			Official Notes For Parts Transferred See Part I The Property (B)
		Acres Hectares		Plan	Index Book No.	O. S.	
1.	COCKSTOWN	1.230	RATHDOWN	35		7/4	From Folio 6946



The Registration does not extend to the mines and minerals.

COLLECTION NO.

LAND CERTIFICATE *msd*



PART II—OWNERSHIP

659182

6-596

TITLE.....ABSOLUTE.....

Land Certificate	No.	The devolution of the property is subject to the provisions of Part II of the Succession Act, 1965.
<p>.....issued to</p> <p><i>Augustus Lillen</i>  <i>&amp; son. sol's.</i>  <i>7, Wentworth Pl.</i>  <i>Wicklow</i>  <i>Reg. 65108</i>  <i>26/7/82</i></p>	<p>1.</p>	<p>10th August 1981 } SYLVIA GERAGHTY of 7  No. B. 3591/81 } Wentworth Place, Wicklow,  Solicitor, is full owner.</p>

19

de  
g.  
e.



27



LAND REGISTRY

County *Wicklow* Folio *5464 F 7/4*

This map should be read in conjunction with the folio (Plan No on 1<sup>st</sup> page)

This map does not show appurtenant rights or servient rights. It is not conclusive evidence as to the boundaries or extent of the land. (See Section 85 of the Registration of Title Act 1964)

Where a boundary has been transferred from a smaller scale map, accuracy is limited to that of the smaller scale.

This map but not a photocopy of it is acceptable for subdivision purposes.

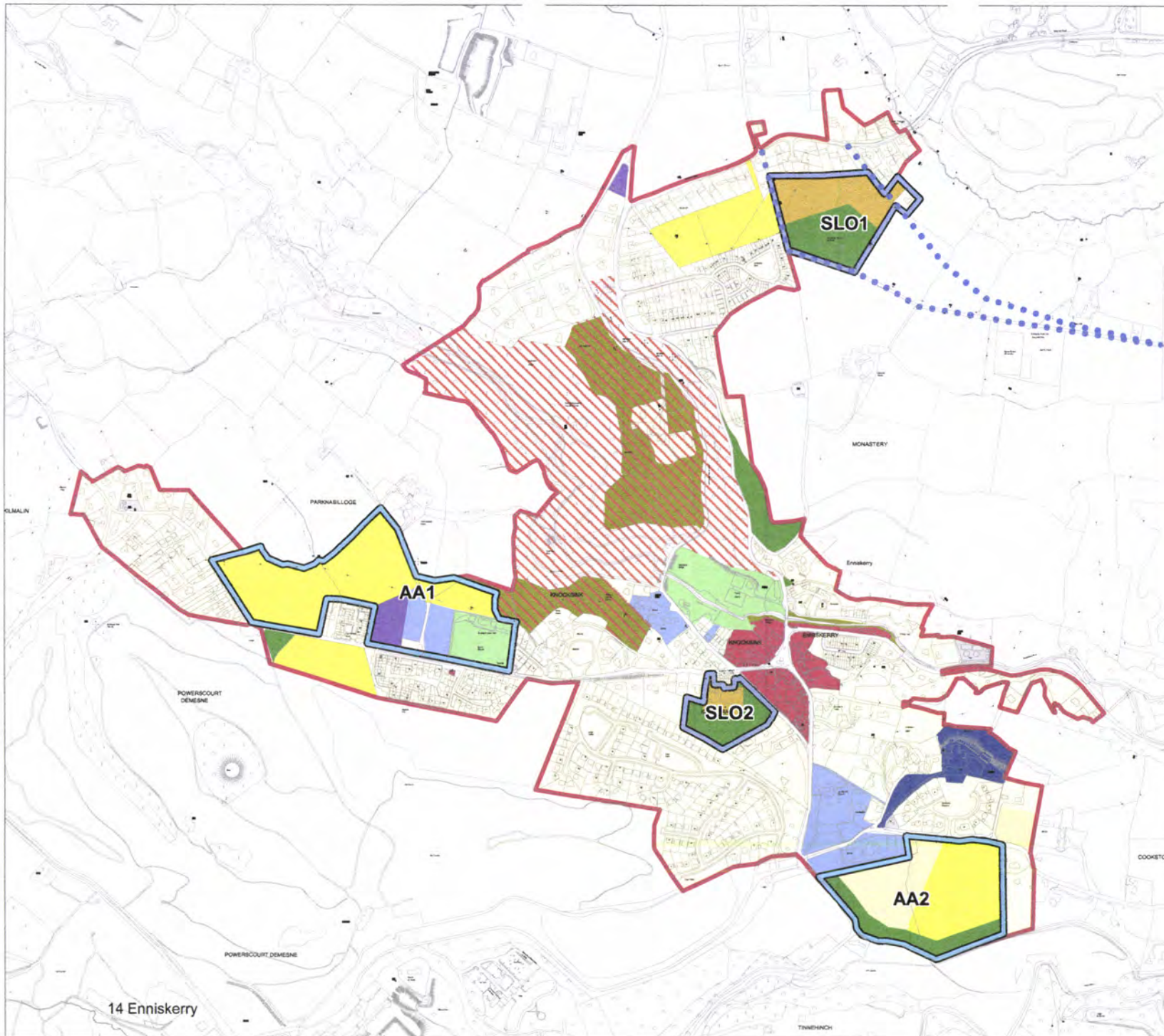


WW005464 F : FP1



# Enniskerry Town Plan

## WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022



- Settlement Boundary
- RE Existing Residential
- R10 Residential
- R20 Residential
- R Special Residential
- TC Town Centre
- PU Public Utility
- CE Community & Educational
- E Employment
- T Tourism
- OS Open Space
- AOS Active Open Space
- POS Passive Open Space
- CA Conservation Area
- Specific Local Objective Boundary
- Action Area Plan Boundary
- Route option for Northern Access Road

Title: Land Use Zoning Objectives  
Map No. : 1



Maps are not to scale

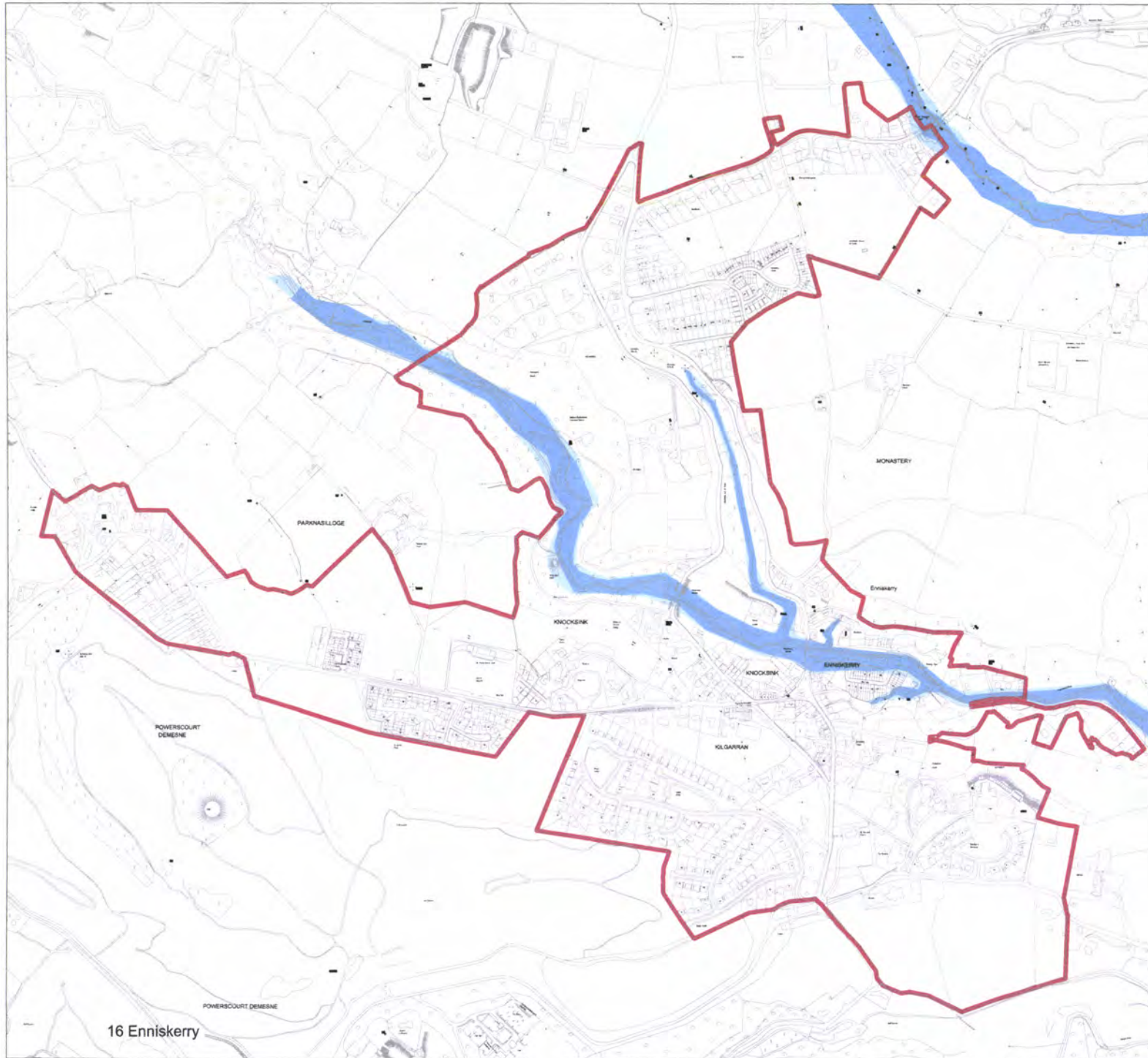
Wicklow County Council  
Planning Department

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Licence Number 2016/35/CCMA/Wicklow County Council

Doc 5






Doc 6.



# Enniskerry Town Plan

## WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

-  Settlement Boundary
-  Flood Zone A: High probability of flooding  
Where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding)
-  Flood Zone B: Moderate probability of flooding  
Where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding)

### Disclaimer

These Indicative Flood Zones were based on information available at the time of drafting and amending this plan. Any new data and analysis carried out after this date has not been integrated into this map but should be used in conjunction with this map for development proposals. All information may be substantially altered in light of future data and analysis.

Full Disclaimer is included in SFRA

### Title: Indicative Flood Zones Map No.: 3



Wicklow County Council  
Planning Department

Maps are not to scale

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Licence Number 2016/35/CCMA/Wicklow County Council



**Leonora Earls**

---

**From:** Davida Geraghty  
**Sent:** 13 September 2017 12:00  
**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. Pat Vance MCC; Cllr. Brendan Thornhill  
**Subject:** Objection to the draft Bray Municipal District Local Area Plan 2017  
**Attachments:** IMG\_3543.JPG; IMG\_3544.JPG; IMG\_3545.JPG; IMG\_3546.JPG; IMG\_3547.JPG; IMG\_3548.JPG; Objection to the draft Bray Municipal District Local Area Plan 2017.docx

Please find attached our objection to the draft Bray Municipal District Local Area Plan and photographic evidence of flooding in our area (Hollybrook Park Bray).

Your sincerely,  
Dr Davida Geraghty and Dr Johan Dehantschutter  
.02 Hollybrook Park  
Southern Cross Road  
Bray  
Contact: 087 902 1111

**Objection to the draft Bray Municipal District Local Area Plan 2017**  
**From Dr Davida Geraghty and Dr Johan Dehantschutter**  
**102 Hollybrook Park, Southern Cross Road, Bray**

Having reviewed and examined the draft Bray Municipal District Local Area Plan 2017, we are very concerned about the planned zoning of Killruddery Demesne West for New residential and New employment. Our concerns include:

1. **Flooding Section 2.2.10:** In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'.

We have experienced several episodes of flooding in our housing estate (the worst occasions in 2002 and 2008). We attach photographs of flooding during November 2002 and we can provide video footage of the flooding in 2008. The local Swan river has completely flooded the woodland area up to the road and there has been flooding behind the Killruddery wall in the form of a temporary river. In more recent years the entire road was flooded (in our estate between houses 97 and 110) and the county council had to come with pumps and pump excess water from the road to prevent flooding to the houses numbered 125-127 (opposite to the above numbers).

If 240 houses and an office/industrial area were to be built on the slopes of the Little Sugar Loaf, it would clearly affect the absorption of rainwater and increase surface run-off leading to greater flooding.

Flooding is already an issue on the road through Killruddery (photos attached) where vehicular access is planned to the housing area and in the Hollybrook Park estate and in the back gardens near the Swan river and generally in Hollybrook Park. Therefore it does not seem appropriate to build more houses in an area which has an existing flooding problem.

2. **Natural Amenity:** The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. This green belt should be preserved and protected and the building of 240 houses, including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people, fauna and flora and also on visitors to the area.
3. **The Character of Killruddery demense:** Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Killruddery House, and to require all development proposals within or directly adjoining

these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. In order to preserve the character of Killruddery demesne, the area should be preserved and enhanced as it currently stands, the building of 240 houses and a new employment area will negatively change the character of Killruddery's demesne.

The Draft plan states that vehicular access to the housing shall be via the existing Killruddery entrance. This would completely change the current entrance and impact the character of Killruddery House and Gardens. Rather than developing the environs of Killruddery House and Gardens, the County Council should be protecting and preserving the County's Heritage.

4. **Traffic:** As residents of Hollybrook Park since 1998 we have experienced a steady increase of traffic on the Southern Cross Road. At certain times of the day we experience great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Frequently the queue of traffic waiting to access the N11 some mornings can be backed up as far as the industrial estate. An increase in the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road and cause further delays and congestion for commuters trying to access the N11 and Bray during rush hour.

The current roads as planned are totally inappropriate for the housing estates that currently exist without the addition of another 240 houses.

5. **Services:** The current Southern Cross Road is completely lacking in development in the area of services for the local housing estates that currently exist. Even though there are over a 1,000 houses on the Southern Cross Road there are no local shops or retail facilities (shops, hairdressers, coffee shops, chippers, pubs, butchers, off licences etc) instead undeveloped wasteland.

There are no connecting routes between the Southern Cross Road and the Boghall Road which mean that local residents must complete an unnecessary loop to access various points on the Boghall Road.

As a local primary school teacher I have found primary schools stretched to the limit (class sizes and prefabs instead of classrooms).

Therefore an additional 240 houses could not be serviced appropriately.

We have presented here our reasons and arguments against the planned zoning of the lower slopes of the Killruddery demesne. We have lived in Hollybrook Park for almost 20 years and find that the previous plan for development in the area has fallen short for the needs of the local residents and could not support further development. For these reasons we strongly appeal that this zoning be omitted from the final plan for Bray Urban Area.













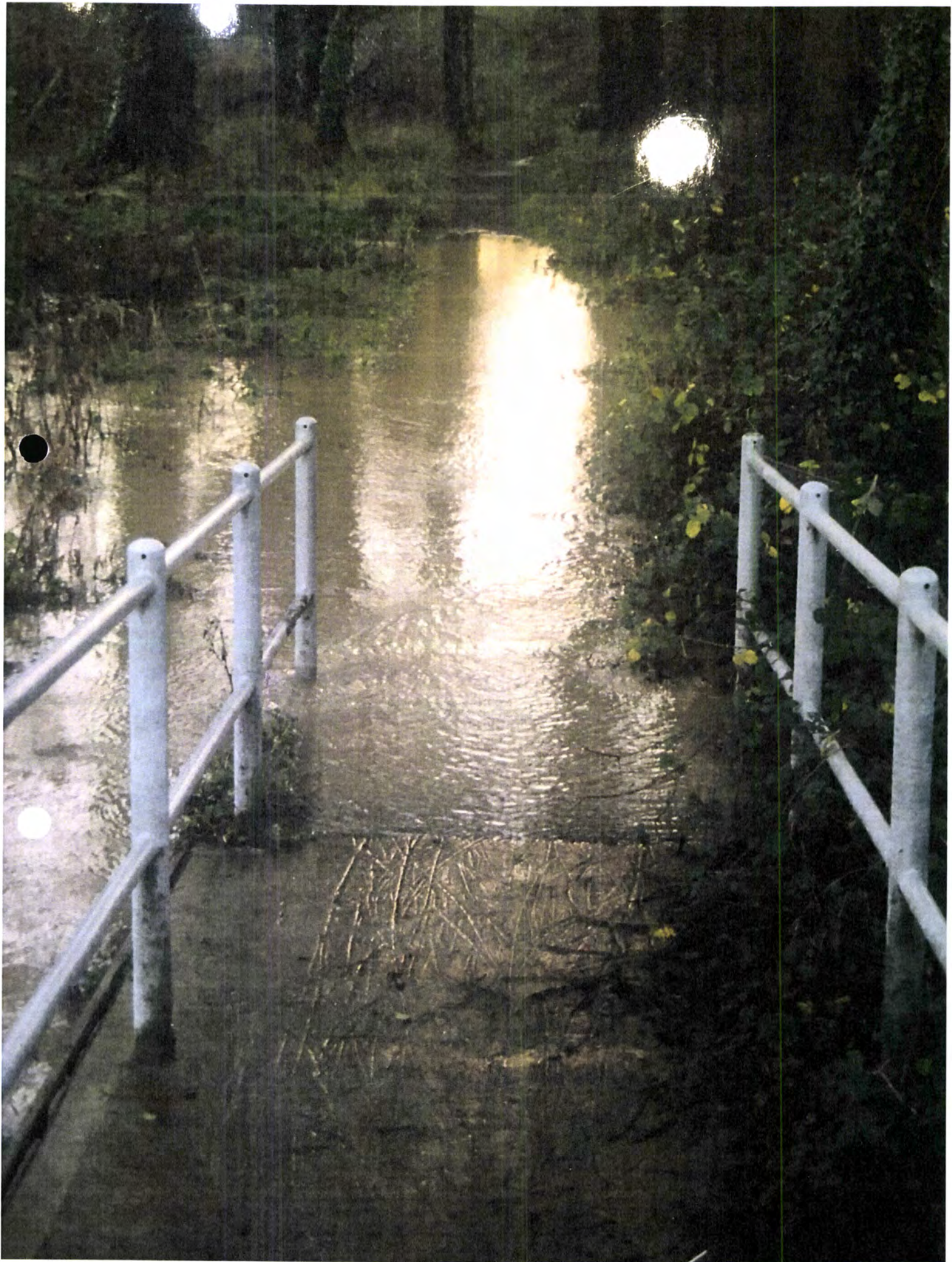


















**Leonora Earls**

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**From:** effat gerges  
**Sent:** 13 September 2017 06:41  
**To:** Planning - Plan Review  
**Subject:** plan

To whom it may concern,

On behalf of the Gerges Saad 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. Gerges Saad 30 Swanbrook, Southern Cross Road, Bray, Co.Wicklow

Sent from my iPad

**Leonora Earls**

---

**From:** .  
**Sent:** 12 September 2017 16:05  
**To:** Planning - Plan Review  
**Cc:** delwen  
**Subject:** objections to proposed development -submission from local householder

dear sir or madam

This submission is in relation to proposals in the current draft Bray Local Area Draft Plan 2017 for further development on the southern cross road kilruddery and surroundings I have some real concerns 1. What benefit will there be for the community particularly residents living on the Southern Cross Road and others near that area if this goes ahead? 2 theres already lots of undeveloped land on the flat off southern cross that's there and not a natural amenity and wasteland

3 what is the purpose of this - who stands to gain or make money from it, will it benefit bray at all?

4. How will traffic, access and public transport issues be addressed on Southern Cross Road? already it is appalling.I recently went to get to the n11 at 4pm one day and there was an appalling backlog to the roundabout - I thought there was an accident and there wasn't it was just VOLUME of traffic trying to get out of bray - its already at bursting point and more house with 1 or 2 cars each will just inflate this issue and be unsafe not to mention pollution 5.aesthetic - I already thoroughly dislike the houses of deepdales that are built higher up into the sugarloaf and are visible from miles around as you look up to the mountains -its such a shame that the landscape is blotted by these houses (and I have some good friends live there ) but I think that higher bit should never have been built -to consider more housing and building up there is awful. with weather conditions,people living on an incline with potential for accidents, possible problems with drainage, possible flooding -its just too much

6 how will this development cater for public services such as public transport, lighting, waste & water and infrastructure?

anyway these are some of my objections -I thoroughly object to any housing or nay development up there

I hope these are noted somewhere and the asking for submissions is not just a whitewash!

yours

Delwen Giles

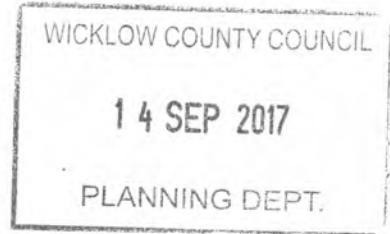
knocknagow

oldcourt park

bray

Giltspur Wood Residents,  
Giltspur Wood,  
Bray,  
Co Wicklow  
Date: 06/09/2017

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



Dear Administrative Officer:

**BRAY MD LAP**

We are writing to make a submission in objection to the rezoning of land, adjacent to Oldcourt House, as R20 'New Residential', shown in Figure 1 below. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017 (BRAY MD LAP 2017).



*Figure 1: Extract from draft Bray Municipal District Local Area Plan 2017. The proposed field for rezoning is coloured in yellow and circled in red*

The news of the proposed rezoning of this field has brought a lot of upset, concern and anxiety within the estate and community and we have outlined several reasons for this objection.

- **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 of time. 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. There was prior building in another cul de sac in our estate in 2001/02 and there was a no. of injuries sustained during the construction phase. We do not want a repetition of this.
- The construction area of a new development would be a danger the small children who would be drawn to the construction site.

- **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. A new development in the area would exacerbate this further.

- **Protected Structures**

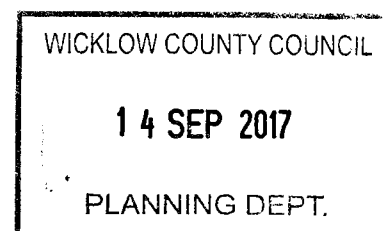
There are four protected monuments adjacent to the land. Developing on the proposed rezoned land would position new buildings and structures extremely close to these precious monuments, risking their preservation and future.

- WI008-002001-Fortified House/Castle, 600 years old
- WI008-002002- the bawn associated with the house-foundations of the wall are still visible
- WI008-003-a high cross
- WI008-041-Oldcourt House-17th century

- **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 and therefore is a flood risk.

- **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 Valley.

- **Loss of green space**

There would be an additional loss of recreational green space within our existing estate to facilitate traffic to new houses

- **Wildlife**

The proposed rezoned field and the surrounding land supports a rich and diverse group of wildlife.

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

Sincerely,

Giltspur Wood Residents,



**Giltspur Wood Residents -**

**Objection to the rezoning of lands at Oldcourt Castle, Bray, Co Wicklow**

**BRAY MD LAP**

	Name	House #	Signature
1	SEAMUS JENNINGS	50	Seamus Jennings
2	Miriam Gallagher	53	Miriam Gallagher
3	Lidia Simoes	58	Lidia Simoes
4	Liam Cousins	61	LIAM COUSINS
5	Christine Spicer	62	CHRISTINE SPICER
6	Antanas Štiogocis	63	Antanas Štiogocis
7	Cliona Holmes	64	CLIONA HOLMES
8	Kilian Doyle	65	Kilian Doyle
9	ALAN DUGAN	66	Alan Dugan
10	VIVIANNE DUNNE	67	Vivienne Dunne
11	CHRISTELLE CUA	69	Christelle Cua
12	SHEELAGH HARTE	70	Sheelagh Harte
13	JOSEPH O'NEILL	77	Joseph O'Neill
14	KIALL MURPHY	78	Kiall Murphy
15	Sian Brennan	80	Sian Brennan
16	CAROL ORMON	102	Carol Ormon
17	Deirdre Ormon	55	Deirdre Ormon
18	Lou McInerney	52	Lou McInerney
19	SARAH COOPER	45	Sarah Cooper
20	Emma O'Brien	44	Emma O'Brien
21	Grainne Flavin	49	Grainne Flavin



**Giltspur Wood Residents -**

**Objection to the rezoning of lands at Oldcourt Castle, Bray, Co Wicklow**

**BRAY MD LAP**

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	Name	House #	Signature
22	REBECCA BARNES	74	Rebecca Barnes
23	DEREK THOMAS	76	Derek Thomas
24	SHANE WALSH	79	Shane Walsh
25	EDWARD FORTUNE	97	EJF
26	LUKE ALTON	101	Luke Alton
27	Joe O'Callaghan	82	Joe O'Callaghan
28	SUZANNE CREEVEY	95	Suzanne Creevey
29	TONY SWAINE	86	Tony Swaine
30	Robert Bongas	89	Robert Bongas
31	Pamela Byrne	48	Pamela Byrne
32	Aislinn Hanrahan	93	Aislinn Hanrahan
33	Tom Hardiman	94	Tom Hardiman
34	Sonia Jakob	26	Sonia Jakob
35	Riechie Mc Dermott	27	Buickie Mc Dermott
36	BARRY CLARKE	28	Barry Clarke
37	MARIA HEGARTY	30	Maria Hegarty
38	FRANK HEGARTY	30	Frank Hegarty
39	PAUL E GILMORE	19	Paul E Gilmore
40	VAL MERCION	18	Val Mercion
41	NOEL MARTIN	17	Noel Martin

**Giltspur Wood Residents -**

**Objection to the rezoning of lands at Oldcourt Castle, Bray, Co Wicklow**

**BRAY MD LAP**

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	Name	House #	Signature
42	Edmond Jorppu	14	Edmond Jorppu
43	Gal M	13	Gal M
44	GAVIN CONWOLLY	12	Gavin Conolly
45	MARGARET FOLEY	42	Margaret Foley
46	Colan O'NEILL	36	Colan O'Neill
47	BILL CAMLIN	35	William Camlin
48	Susan young	34	S young
49	CIARA MURPHY	33	Cara Murphy
50	ROSALEEN DUNNE	31	Rosalen Dunne
51	Unguzrann Andzelj	11	Unguzrann Andzelj
52	Kenneth Malmberg	10	K Malmberg
53	URBERTO COCCIGLIA	20	Urberto Cocciglia
54	CIERAN NOLAN	21	Cieran Nolan
55	ANDRE MICHEL	23	André Michel
56	ANN MURPHY	29	Ann Murphy
57	TRACY BUTLER	43	Tracy Butler
58	RUTH DOYLE	91	Ruth Doyle
59	ANGELA DENVER	90	Angela Denver
60	Carol Texle	87	Carol Texle
61	Fintan Conolly	44	Fintan Conolly

**Giltspur Wood Residents -**

**Objection to the rezoning of lands at Oldcourt Castle, Bray, Co Wicklow**

**BRAY MD LAP**

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	Name	House #	Signature
62	Tina Boyle	75	Tina Boyle
63	Ruth Graham	99	R. Graham,
64	John Nolan	88	John Nolan
65	Carmel Connellan	51	C. Connellan
66	ANDREW RYDER	<del>47</del> <sup>37</sup>	Andre Ryde
67	NATALIE CROSBIE	9	Natalie Crosbie.
68	Esperance M. Cullinane	8	Esper. Cullinane
69	Martina Clancy	15	M. Clancy.
70	Elizabeth Kelly.	24	Elizabeth Kelly.
71	Anne Hargaden	40	ANNE HARGADEN
72	Stella Vladean	60	
73	Mae Worsell	56	Mae Worsell
74	TRISH PENPELPORT	38	TRISH Penpepfort
75	FERGAL FOLEY	47	
76	ANN CREMINS	71	Ann Cremins
77	Andrew McElroy	72	Andrew McElroy
78	Barry Hall	83	Barry Hall
79	Glenn Dunne	81	
80	Michelle Stephens Byrne	54	MICHELLE STEPHENS BYRNE
81			

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Robert & Ruth Graham  
99 Giltspur Wood  
Bray A98 HY82  
Co Wicklow

8th September 2017

WICKLOW COUNTY COUNCIL  
14 SEP 2017  
Corporate Affairs

Administrative Officer  
Planning Section  
Wicklow Co Council  
Station  
Wicklow Town

Dear Administrative Officer

Re: 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.

- 1. **Tree preservation order.**  
There is a tree preservation order which covers all the trees on the proposed rezoning site and all the land surrounding the site.
- 2. **Health & Safety**  
The very popular and child friendly green area is a major part of the estate. It is a safe and friendly environment for children to play in a cul de sac which in the proposed plans would be broken through into the new rezoning land.
- 3. **Traffic congestion**  
We have already had an increase in traffic on the Soldiers road due to the new development Castlelynn and the change in direction of the traffic on Soldiers road which had caused an increased delay in the lights onto the Killarney Road.
- 4. **Protected Structures**  
There are 4 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

Thanking you for your favourable consideration with this most important matter.

Sincerely

*Robert & Ruth Graham*  
Robert & Ruth Graham

**Leonora Earls**

---

**From:** Caoimhe Guilfoyle  
**Sent:** 14 September 2017 19:05  
**To:** Planning - Plan Review; ronan@nosafety.net  
**Subject:** Bray Municipal District Local Area Plan - Objection  
**Attachments:** Bray Municipal District Local Area Plan Objection.docx

To whom it may concern,

Please find attached my objections to the current Bray Municipal District Local Area Plan.

I specifically object to the new zoning on the Kilruddery estate, the new residential zoning on the lower slopes of the little sugarloaf and the new industrial zoning that backs onto the existing industrial estate.

Ronan & Caoimhe Guilfoyle  
104 Swanbrook  
Southern Cross Road  
Bray  
Co. Wicklow

To: Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town  
Email: planreview@wicklowcoco.ie

I am writing to register my strong objection to the planned rezoning of lands in Kilruddery that are included in the Draft Bray Municipal LAP 2017.

I note that the Planning and Development Act 2000 calls for a balance between economic, social and environmental use, maintaining and developing quality of life without compromising the environment. I do not believe that this plans follows the objectives of the Act.

I specifically object to the doubling of density on the slopes of the Little Sugar Loaf in Kilruddery Demesne. This is an area of strategic importance to tourism in Bray, Co. Wicklow and the country. I do not believe that the proposed zoning is desired by the Estate owners, and will therefore fail to deliver the housing that is envisioned. In fact the only way that the actual development is likely to happen is if punitive taxes are levied on undeveloped land zoned for residential use. This might force the hand of the estate owners, spoiling the Special Amenity that is encompassed.

**Insufficient flood protections.**

In response to previous submissions it has been suggested that the problem of flood defense is for the planning process to deal with. I do not believe that this is feasible, and to suggest that the land is suitable for zoning without understanding if development is viable is shortsighted at the very least. In bad weather there is already an existing flood issue to a number of residences in both Hollybrook Park and Swanbrook that I am aware of. This current issue has not been addressed by Wicklow County Council as it is. The proposed increased development will add significantly to this as run-off water from the developed land must be accommodated into the Swan River. There is no mention of the current

risk of flooding in the Strategic Flood Risk Assessment. Good governance would indicate that a proper assessment be undertaken before any change to the zoning occurs.

### **Zoning additional commercial space in Kilruddery**

If the intent of the development plans is to deliver commercial enterprise, and local jobs, then I propose the County Council invest considerable effort instead in bringing the currently idle lands on the Boghall road back into use. It would appear that this would be more appropriate, and more likely to deliver the desired employment without compromising the environment.

I would also like to point out that the map accompanying the draft plan clearly identifies land to be zoned for "Special employment". This is in conflict with the text on the plan SLO-1, pg 60: "In order to facilitate commercial uses which may not be strictly linked to the tourism product on these lands, land is designated for general 'employment' use".

### **Failure to develop the SCR area according to the previous plan.**

Failure to develop the SCR as was envisioned. There are no amenities, insufficient public transport, no local shops, no litter bins and the area is not maintained to an acceptable level for the current residents.

Separate to the failure to deliver on public amenity, the lack of basic maintenance is further evidence that the ability to execute on these plans does not currently exist and less ambitious targets should be defined. As an example the footpath on both sides of the Southern Cross Road is overgrown to the extent that it may be dangerous for casual walkers and runners, who are often forced to navigate the verge with uneven ground invisible in the long grass likely to sprain ankles.

We spent 2 months corresponding with Bray Municipal District and local politicians trying to have the hedging and the grass verges cut along the SCR in June and July 2017 after highlighting the dangers of the brambles and nettles to walkers, children and runners. We were advised that this maintenance only happens once a year due to budget restrictions.

There were to be penalties to the developer, Nechouka that have never been collected for lack of development of the 1.78acre site on the SCR.

All of these are valid reasons to reject the idea of further development in the area. The residents of the SCR are not being provided with any services or maintenance as it is so adding to the population here will only increase the problem. If we learn anything from previous development plans, it is that development does not follow a plan.

### **Special Amenity Area Order, Little Sugar Loaf.**

There appears to be no mention of the previously proposed SSAO for the Little Sugar Loaf. The proposed zoning *includes* lands that are part of the "future" SOAA for the Little Sugar Loaf. I notice that the SOAA for the Little Sugar Loaf is absent from this draft plan, though formed part of the Wicklow CDP 2010 -2016 Volume 2 – Natural Heritage, pg 51.

I propose that the SAAO for the Little Sugar Loaf be implemented in recognition of the very significant amenity to the local community and to tourism in the area, and that this be given appropriate priority over the proposed increased density.

Thank you for taking the time to review my objections and I hope you will incorporate appropriate changes to the plan to address the issues I have highlighted.

Best Regards

Ronan and Caoimhe Guilfoyle

Ronan and Caoimhe Guilfoyle  
104 Swanbrook  
Southern Cross Road  
Bray  
Co. Wicklow

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

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

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I note that the Planning and Development Act 2000 calls for a balance between economic, social and environmental use, maintaining and developing quality of life without compromising the environment. I do not believe that this plans follows the objectives of the Act.

I specifically object to the doubling of density on the slopes of the Little Sugar Loaf in Kilruddery Demesne. This is an area of strategic importance to tourism in Bray, Co. Wicklow and the country. I do not believe that the proposed zoning is desired by the Estate owners, and will therefore fail to deliver the housing that is envisioned. In fact the only way that the actual development is likely to happen is if punitive taxes are levied on undeveloped land zoned for residential use. This might force the hand of the estate owners, spoiling the Special Amenity that is encompassed.

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I would also like to point out that the map accompanying the draft plan clearly identifies land to be zoned for "Special employment". This is in conflict with the text on the plan SLO-1, pg 60: "In order to facilitate commercial uses which may not be strictly linked to the tourism product on these lands, land is designated for general 'employment' use".

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Separate to the failure to deliver on public amenity, the lack of basic maintenance is further evidence that the ability to execute on these plans does not currently exist and less ambitious targets should be defined. As an example the footpath on both sides of the Southern Cross Road is overgrown to the extent that it may be dangerous for casual walkers and runners, who are often forced to navigate the verge with uneven ground invisible in the long grass likely to sprain ankles.

We spent 2 months corresponding with Bray Municipal District and local politicians trying to have the hedging and the grass verges cut along the SCR in June and July 2017 after highlighting the dangers of the brambles and nettles to walkers, children and runners. We were advised that this maintenance only happens once a year due to budget restrictions.

There were to be penalties to the developer, Nechouka that have never been collected for lack of development of the 1.78acre site on the SCR.

All of these are valid reasons to reject the idea of further development in the area. The residents of the SCR are not being provided with any services or maintenance as it is so adding to the population here will only increase the problem. If we learn anything from previous development plans, it is that development does not follow a plan.



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I propose that the SAAO for the Little Sugar Loaf be implemented in recognition of the very significant amenity to the local community and to tourism in the area, and that this be given appropriate priority over the proposed increased density.

Thank you for taking the time to review my objections and I hope you will incorporate appropriate changes to the plan to address the issues I have highlighted.

Best Regards

Ronan and Caoimhe Guilfoyle

**Leonora Earls**

---

**From:** Eileen Hannon [mailto:ehannon@kilderry.com]  
**Sent:** 13 September 2017 22:48  
**To:** Planning - Plan Review  
**Subject:** Submission - objection to rezoning of lands at Kilruddery (R20), Bray

Dear Sir/Madam,

I wish to submit my objection to the proposed rezoning of lands at Kilruddery (R20) to residential use.

The addition of the any new residential units on this scale will add to the traffic congestion on the already busy Southern Cross Road. Moreover, any such development will impinge on the natural beauty to the lower slopes of the Little Sugarloaf.

Kind regards,

Eileen Hannon  
129 Belmont  
Southern Cross Rd  
Bray  
Co. Wicklow



**Leonora Earls**

---

**From:** Pat Hannon  
**Sent:** 13 September 2017 22:42  
**To:** Planning - Plan Review  
**Subject:** Submission to object to rezoning of lands at Kilruddery (R20)

Dear Sir/Madam,

I wish to submit my objection to the proposed rezoning of lands at Kilruddery (R20) to residential use. This addition of the residents will add to the traffic connection of the already busy Southern Cross Road and any development will impinge on to the lower slopes of Little Sugarloaf.

Kind regards,

Pat Hannon  
129 Belmont  
Southern Cross Rd  
Bray  
Co. Wicklow

C140

94 Giltspur Wood  
Bray  
Co Wicklow

Administrative Officer  
Planning Section  
Wicklow County Council  
Station  
Wicklow Town

**BRAY MD LAP**


10th September 2017  
Wicklow County Council  
13 SEP 2017  
PLANNING DEPT.

Dear Officer,

We would like to express our objections to the proposal of rezoning of the lands at Oldcourt Castle in Bray, Co Wicklow for several reasons:

- The loss of a large number of mature trees, which would also cause the loss of wildlife habitats.
- The risk of flooding, Old Court River is closely located, already, wet winters cause waterlogged gardens, any loss of green ground to housing, drives & roads will increase the frequency & severity of the flooding, it is already labelled a "one in a hundred flood risk", the loss of green soakage would increase this risk.
- There is a castle dating from about 1440, building nearby could endanger its stability.
- The building work would endure for approximately 1 year, this would necessitate heavy vehicles and machinery entering the estate on a daily basis which causes serious safety issues as they would be driving past the green which is the play area for the very young children of the estate.
- A building site in the estate would become a playground for young curious kids, no matter how secure the site (A previous building project in the estate, lead to child accidents on the building site, as well as on the road just outside the site).
- Due to the proximity of the river there are rats in the area, we have occasionally seen them in our gardens, building work disturbs rats, causing disorientation and therefore probable rat infestation in gardens and possibly houses which is a huge hygiene concern.
- We purchased our house in the estate based on the layout and actually paid a premium to be at the end of the cul de sac, the proposed building through of the cul de sac changes completely the character of our position.
- The closeness of the proposed building and the duration of the work, would necessitate approximately a year's worth of noise, dust and traffic.

Yours Sincerely

  
*Kevin & Ciara Hardiman*  
 Kevin & Ciara Hardiman

WICKLOW COUNTY COUNCIL  
13 SEP 2017

**Leonora Earls**

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**From:** Niamh Harman |  
**Sent:** 12 September 2017 21:17  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan  
**Subject:** Draft development plan - Oldcourt house Bray - OBJECTION

To whom it may concern,

Regarding the above draft development plan, which includes the development of lands at Oldcourt House, Bray, we, as residents of Giltspur brook strongly object to this element of the development plan due to the impact the construction activities and future site access will have on our livelihoods.

Currently Giltspur brook provides for sufficient green space and safe access due to the density of housing combined with traffic volumes entering and existing the estate. We believe that any increase in housing in the proposed lands will require primary and potentially secondary access through either Giltspur Brook or any of the adjacent estates.

As all of these estates are already accessed through other primary access routes (estates) this would inevitably require any new housing to be the 3rd location for traffic occupying the new development.

In essence any current housing, green areas, pathways or access routes on the Boghall road, Killarney road or Vevay road will have further increase in traffic volumes that will affect the safe access of parents and children travelling to and from all local schools.

Giltspur Brook currently benefits from sufficient green area that allow families and residents to enjoy their surroundings, particularly allowing children to play and socialise within safe cul de sac's. Any potential access routes created through this estate will remove and completely eliminate this benefit to all householders. More concerning will be the greater risk to children who, wishing to explore, will no doubt travel through any new access points.

This creates numerous issues that should not be put on the shoulders of any parent. Either the freedom to allow children enjoy their surroundings or create fear and paranoia for all parents as to whether their children are safe.

We are very much in support of any development that will support both the local economy, through construction employment, suppliers and eventually dealing with the housing crisis but there comes a time when trying to squeeze developments into space purely because it is unoccupied has a knock on effect to the wider community.

We are proud to be part of Bray and Wicklow but this proposed element of the development plan will create a significant unhealthiness to the wider environment.

We are available at any time to discuss these concerns and we very much appreciate you taking the time to consider our concerns.

Kind regards

Anthony & Niamh Harman  
34 Giltspur Brook, Bray

**Leonora Earls**

---

**From:** Terry Harvey [mailto:terence.harvey@wco.ie]  
**Sent:** 14 September 2017 15:05  
**To:** Planning - Plan Review  
**Subject:** Re Social Hosing Kilbride Lane Bray

I would encourage Wicklow Co Co. to make a major push to get these houses built as quickly as possible. I cannot believe after paying a huge amount of money, this site has been left derelict.

Wicklow Co Co seem to be totally out of touch with the amount of people on homeless list, particularly in north Wicklow.

I await with interest what will happen.

Sincerely

Terence Harvey

14th Sept 2017

Sent from my iPad

**Leonora Earls**

---

**From:** Daniel Hatter  
**Sent:** 14 September 2017 19:33  
**To:** Planning - Plan Review; Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox  
MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr.  
Brendan Thornhill  
**Subject:** Bray LAP 2017  
**Attachments:** Bray LAP 2017.pdf

Hello,

The attached document contains our concerns regarding the Bray LAP 2017.

Kind Regards

The Residents, 86 Deepdales

---

86 Deepdales  
Bray, A98 E624

September 14, 2017

Dear Sir or Madam,

We are writing about our concerns with the draft "Bray Municipal District Local Area Plan 2017".

We have concerns about the impact of the proposed development of housing in Kilruddery Lands on the surrounding area. We believe that the infrastructure in the area is insufficient to support the proposed development. The area is lacking in, schools, shops, recreational spaces and most importantly transport.

As it currently stands it is difficult and time consuming for us to exit our estate (Deepdales) and to access the N11 and town during peak travel hours. The addition of 240 households worth of traffic to the current infrastructure, without improvement is unrealistic.

In regards to public transport we refer to "8.1.2 Public Transport PT3" and we welcome the proposed improvements, but we feel strongly that these improvements should be put in place before Bray experiences a significant population increase.

We are also uncertain if sufficient consideration had been given to the capacity of the primary and secondary schools in the area to cater for the increased demand on them envisioned in the plan, duo to the welcoming of many new families into the greater bray area.

Sincerely,

The Residents, 86 Deepdales



**Leonora Earls**

---

**From:** Healy, Christine [  
**Sent:** 15 September 2017 10:07  
**To:** Planning - Plan Review  
**Cc:** Rob Healy (rob.healy@crofftontraining.com)  
**Subject:** Objection to Variation No. 1 of Wicklow County Development Plan 2016 - 2022

**Importance:** High

To whom it may concern

I am a resident of the Southern Cross Road in Bray and wish to object to the amendments (rezoning of Little Sugar Loaf) proposed in variation No 1 of the Wicklow County Development Plan 2016 – 2022 for the following reasons:

1. Lack of infrastructure to support such housing/increased industry
2. Lack of public transport to SC Rd already
3. Increase in traffic would have negative impact on Bray Business Park traffic.
  - I work in Bray Business Park on the Southern Cross Road and can confirm that there is already much traffic build up in entering and exiting the business park at many times during the day.
4. Increased traffic through our estates to access this area, with subsequent parking, vandalism, etc. (this has not been considered in the Government's 2020 Travel Plan)
5. Proposed walkway through Hollybrook Park would increase existing problems of drinking in the woods
6. Increased potential for flooding as more of the foothills of the Mountain are built up
7. Housing will not be available for social housing and will outprice most Bray residents (suggestion of 12 houses per hectare, not the standard 36 per hectare)

Please remove this proposal from the amendments as they are not appropriate for the area.

Yours sincerely  
Christine Healy

84 Hollybrook Park  
Bray  
Co Wicklow

**Leonora Earls**

---

**From:** Sandra Heffernan  
**Sent:** 03 September 2017 09:45  
**To:** Planning - Plan Review  
**Subject:** Objection to Bray Municipal District Local Area Plan

Wicklow County Council

As a resident of Hollybrook Park, Bray, Co Wicklow, I wish to object to the draft Bray Municipal District Local Area Plan for the following reasons:

The proposed building on the Little Sugarloaf (an area of natural beauty) is insane and short sighted. It will ruin it forever and reduce tourism in the area.

Infrastructure or should I say lack of infrastructure, for the current resident of the area: what was promised 20 years ago (shops etc.) has still to be delivered. There is a lack of public transport on the Southern Cross, road markings are faded or missing in some parts. If I didn't or couldn't drive I have a 20 minute walk to buy milk or bread. Now that the Finnegan's service is reduced I would have a 45 minute walk to the Dart station to get to work, as the 84X doesn't meet my needs.

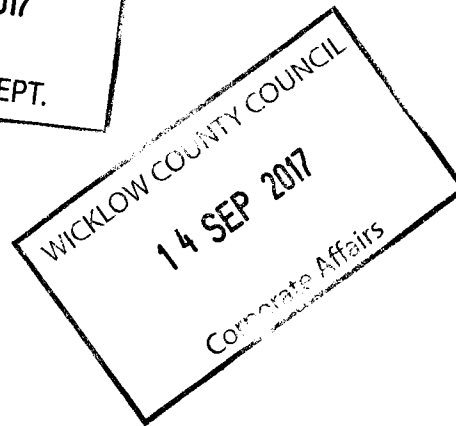
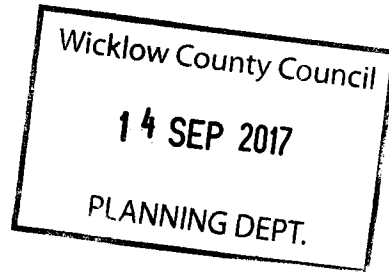
Flooding is also a major concern. We see water logged gardens and partial flooding in Hollybrook Park already. We are surrounded by rivers that are kept at bay by local residents. Where will the run off from the Little Sugarloaf be diverted to? I don't want to be a feature on the RTE news, where my home is flooded because the planners didn't get it right again.

Yours sincerely  
Sandra Heffernan

C146

Frank Hegarty,  
30 Giltspur Wood,  
Killarney Road,  
Bray.

13/9/2017



Administrative Officer,  
Planning Section,  
Station Road,  
Wicklow.

Dear Administrative Officer,

**Re: Bray MD LAP 2017**

We wish to submit an objection to the rezoning of land adjacent to Giltspur Wood / Oldcourt House as R20 New Residential. The rezoning of this land is outlined in the Bray Municipal District Local Area Plan 2017. We are objecting for the following reasons:

**Health and Safety**

Access to this site would require breaking through a cul de sac which has been part of Giltspur Wood estate since it was constructed over twenty years ago. This access would be through a green space which is a popular play area for children in the estate. Construction on this land will result in a large volume of heavy vehicle traffic through Giltspur Wood estate.

**Traffic Congestion**

Recent changes to the direction of traffic on Soldiers Road, coupled with the development of Castlelynn estate have increased the traffic flow in the vicinity and a new development in the area would exacerbate the situation.

**Environment**

Oldcourt Castle is a protected structure within the current Bray Town Development Plan and is situated close to the land proposed for rezoning. The Swan River Valley is listed as a protected view in the above plan. The Swan River area has potential for development as an urban greenway and walkway as an amenity for all residents of our town. There is a tree preservation order which covers the trees and the land on the proposed site. (Order no. 5 Oldcourt House and Vevay House, Swan River.)

We ask that you consider our submission and objections to the rezoning of this land.

Yours sincerely,

Frank and Marie Hegarty

**Leonora Earls**

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**From:** Narelle Hegarty  
**Sent:** 15 September 2017 08:50  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District LAP 2017  
**Attachments:** zoning.doc

Please see attached document

Regards,

Narelle

32 Deepdales,  
Bray,  
Co. Wicklow

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

Executive Planning Officers,  
Wicklow County Council,  
County Buildings,  
Co. Wicklow.

Dear Planning Officers,

With regard to the Draft Bray Municipal District Local Area Plan 2017 – with reference to Land Use Zoning Map No. 2 proposals for lands south east of Deepdales estate, we would like to express our concern over traffic issues.

While we recognise the need for local housing, the Southern Cross Road has regular traffic issues with the current level of cars on the road. There is a significant build-up of traffic at all peak times . This congestion creates problems on the Southern Cross Road itself, causing delay to all residents and other local businesses not only at peak times, but when there is any kind of traffic incident on the N11, the Southern Cross Road becomes gridlocked with the existing flow of traffic.

The housing component of the plan suggests that if this plan was passed, there would be an unacceptable increase of local cars on the Southern Cross Road which would impact negatively on all the existing residents who already have to regularly queue to simply enter and exit their estates as well as spending a considerable amount of time each day getting onto the Southern Cross Road from the N11 and /or getting on to the N11 from the Southern Cross Road.

We respectfully request that you take these observations into consideration.

Yours faithfully,

Narelle Hegarty & Denis Patterson

**Leonora Earls**

---

**From:** Carmel Henderson  
**Sent:** 04 September 2017 10:28  
**To:** Planning - Plan Review  
**Subject:** new zoning to Kilruddery estate

To whom it concerns

We would like to record our concerns at the implications for us going forward of the following:

**New zoning on Kilruddery Estate** i.e. changing the estate from a green belt to conservation and tourism zoning. As our house borders this estate we would be concerned as to the plans for Kilruddery and of the necessity of changing this zoning.

With regard to the new **residential zoning** on the lower small sugarloaf and the extra **industrial zoning** we feel that this would cause a large increase in traffic on the already severely congested at times, Southern Cross. Also we would like to know where the planned exit onto the Southern Cross would be. It has already become very difficult to exit our estate as the traffic has increased from Greystones and Bray in general.

We would also question the wisdom of the sprawling development of Bray town by allowing the Kilruddery estate and the small sugarloaf area to become built up and industrialised instead of remaining as place of natural beauty and part of the amenities and lungs of the town.

Yours sincerely,

Carmel Henderson  
John Henderson

**Leonora Earls**

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**From:**  
**Sent:** 08 September 2017 12:05  
**To:** Planning - Plan Review  
**Subject:** Draft Local Area Plan for Bray by Wicklow County Council

Dear Sir/Madam,

I wish to advise you of my objection to that element of the Draft Local Area Plan for Bray which would grant planning permission for an additional 240 houses on the edge of the Kilruddery Estate adjacent to Hollybrook Park, Swanbrook Park, and the Bray industrial park.

My objections are based on the following:

Kilruddery Estate is part of our local heritage and should be preserved for future generations to enjoy. It is a growing tourist attraction for the area and further erosion of the estate lands places it's commercial viability in serious jeopardy.

Secondly, the sugarloaf mountain is an area of outstanding beauty and the elevation of the proposed development is too high and would destroy the natural beauty of the area.

Currently there are insufficient public services for the southern cross road, the 84X only runs at peak times and therefore does not facilitate unsociable working hours. There is no longer a shuttle service from the southern cross road to the Dart. Traffic at peak times results in serious delays at either end of the southern cross road, additional traffic would only compound this.

The current housing estates on the lower slopes of the sugarloaf (Swanbrook and Hollybrook) are subjected to flooding each winter/spring as the water runs off the mountain to a river which is piped under these estates. At times the pipe is insufficient for the quantity of water and there is serious flooding around the boundary wall.

Accordingly I would like the Councillors to oppose this aspect of the draft plan and to protect Kilruddery estate from further erosion of critical agricultural land.

Yours faithfully

David Hickson

93 Hollybrook Park, Kilruddery, Bray, Co. Wicklow.



**Leonora Earls**

---

**From:** Carole Hill  
**Sent:** 06 September 2017 12:33  
**To:** Planning - Plan Review  
**Subject:** Proposed re-zoning of land in Killruddery Estate

Dear Sirs

Having only recently learned of the proposed re-zoning of fields in Killruddery Estate, we are writing to **vehemently oppose** such a move on the following grounds:

- whilst we support the need for housing in the Bray area, this location is totally unsuitable in one of the county's premier tourist locations - it would, we feel, undermine the integrity of Killruddery Demesne as the proposed development is far too close to the historic and unique house and gardens
- there is no suitable access to the proposed rezoning
- Hollybrook Park already stands on a 'pile-driven' foundation due to the marshy ground in this area. We fail to see how more development on that land can in any way prevent serious flooding to any new or existing housing/industrial units.
- The Southern Cross Road is at maximum capacity for traffic - the road is gridlocked on a daily basis at rush hours (and many afternoons also) - adding 500 or so more cars into this is a fiasco.
- The infrastructure for the existing housing estates on the Southern Cross Road is poor to non-existent.

Yours faithfully

John & Carole Hill  
1 Earlscroft  
Southern Cross Road  
Bray

**Leonora Earls**

---

**From:** Aidan Hoey  
**Sent:** 11 September 2017 20:58  
**To:** Planning - Plan Review  
**Subject:** BRAY MD LAP  
**Attachments:** Inkedbray dev plan\_LI.jpg

Dear Administrative Officer

I would like to make a submission to the LAP.

The grounds of Kilbride House, Herbert Road contains many trees some of whom are fine mature native Irish specimens.

I strongly believe that from an environmental, aesthetic and noise pollution perspective point of view this area should have a Tree Preservation order.

Attached please find a map of the area which should have the TPO.

Best Regards

Aidan Hoey  
78 Richmond Park  
Herbert Road  
Bray  
Co. Wicklow



**Leonora Earls**

---

**From:** Eamonn Purcell  
**Sent:** 12 September 2017 20:24  
**To:** Planning - Plan Review  
**Subject:** Bray Draft Development Plan  
**Attachments:** letter to planners.docx

Hollybrook Rk RA

planreview@wicklowcoco.ie

Wicklow Council Council,  
Planning Department,  
County Buildings,  
Wicklow.

12 September, 2017.

**Re: Bray Area Redevelopment Plan**

Dear Sir/Madam,

We are writing on behalf of the residents of Hollybrook Park, Southern Cross Road, Bray to object to the rezoning of areas of Kilruddery as proposed in the Draft Local Area Development Plan for Bray.

Firstly we should say that we are not opposed to development and recognise that a town like Bray needs to have scope to develop houses and to create employment. What is important is that any such development is done in an appropriate manner and in a way where it is sustainable and supported by the proper infrastructure.

Proposals of concern:

New Zoning on Kilruddery Estate from Green Belt to Conservation and Tourism;

Residential Zoning in Kilruddery on slopes of Little Sugarloaf– 12 Hectares with 240 housing units.

Industrial/Commercial use – large area behind Hollybrook/Swanbrook and a large area behind Deepdales.

We held a Public Meeting earlier this month which was attended by the Minister for Health, Simon Harris, T.D., John Brady T.D., and many of the elected Councillors at which the concerns of the residents of the Southern Cross Road had in relation to the proposed rezoning and potential developments. Well in excess of 150 residents attended this meeting to share their concerns in relation to the proposals.

We will set out below some of our concerns:



### **Lack of Infrastructure –**

The estates on the Southern Cross Road are all approximately 20 years old now. Despite the promises when the houses were being developed for shops, cinema, etc. there was no such development. The houses were built and nothing else followed. An elderly or infirm person living on the Southern Cross Road has no access to a shop without driving to it.

With this new proposed development we are being promised cycleways, sports grounds, walkways, etc. Given our experience we feel that this is all put into the Development Plan to make it look attractive and that in practise what will happen is that once the zoning is agreed, the development land will be sold to Developers and the houses will be built – nothing else will happen and we will be told there is no money in the County Council budget for the other facilities.

Even over the years when we looked for the Southern Cross Road to be maintained better as one of the main entrances/thoroughfares into the Bray /Greystones area we were told there was no money to do it so why would we believe that this would change.

### **Traffic –**

This is one of the key concerns for all residents of the Southern Cross Road as well as people residing in the northside of Greystones. As it is, the Southern Cross Road is normally gridlocked, particularly at certain times of the day. For those living on the Hollybrook/Swanbrook/Deepdales side of the SCR, trying to turn right at any time of the day can take for ever due to the constant stream of traffic. Recent experiences quoted to us are of residents taking 6/7 minutes waiting before they can exit their estate to turn right. Given that in the morningtime, much of the traffic is heading in the direction of the six schools in the Vevay Road area, the idea of adding 240 houses, with a potential five hundred more cars to this makes no sense whatsoever!

In the plan at present it appears that road access to the new housing would be through Kilruddery – however we understand that this can change once the zoning is approved. There is a very strong likelihood that this access could be through the gate which currently exists between Swanbrook and Earlscroft. No matter what, putting 500 additional cars through the front gate of Kilruddery or through one of the estates is not feasible or appropriate.

Related to the traffic issues is the almost complete lack of public transport for most residents of the SCR. Apart from a small no. of 84x's in the morning and evening, there is no public transport – and the Finnegans bus service has been reduced further and further over the years. The 84x takes people out of Bray but there is virtually no public transport into the town to shopping/go for a meal or drink/get to school or work. This is despite the fact that the Plan is about the redevelopment of the area, not how to get people to leave the Bray area and shop elsewhere.

## **Flooding issues**

As our houses are already built on the foothills of the Mountains, flooding in gardens has always been an issue for many residents – most of us have had problems with drainage in our gardens already over the years. To add another 240 houses as well as further Industrial units, will only increase the likelihood of serious flooding in our estates, particularly where we have a stream which is fed into an underground pipe and which already floods the ground when there is heavy rain. Many residents have suffered with flooding over the years – at the meeting one resident produced footage of 2 feet of water gushing along the boundary wall between Hollybrook and Kilruddery.

## **Industry/Employment**

As indicated we recognise the need to create employment and space for businesses to develop. However, Bray is already full of vacant sites where business no longer exists and which would be more appropriately be used for such development. Such sites exist on the Boghall Road and the Southern Cross, and all around the town so we do not accept the need for further development on the Little Sugarloaf.

## **Vandalism**

Vandalism is already an issue in Hollybrook Park as young people pass through the estate. We feel that the proposals will increase footfall through the estate with potential for increased vandalism.

## **Car parking**

If the proposed recreational facilities do come to pass, it is envisaged that cars will use Hollybrook Park for parking to use the proposed walkways/cycleways. There is no space for car parking – as it is it can be inaccessible to emergency vehicles and there is no scope for further cars using the estate for car parking.

## **Tourism / Natural Amenity of the Sugarloaf**

Bray depends heavily on tourism which brings a lot of income into the town. A lot of this is dependent on the natural beauty of the seafront, the promenade and the views from Bray Head. The idea that the County Council would rezone one of the areas of real natural beauty, destroying the wonderful natural amenity that is the little Sugarloaf, particularly when there is no need to do so is absolutely shocking. There is a big emphasis in the Plan on the importance of preserving Bray's natural amenities on the one hand while the Plan on the other hand is talking about building on one of the best amenities we have. This makes no sense whatsoever.



We request the Planners to revise the draft Plan to ensure that the special amenity which is the Little Sugarloaf is protected from rezoning and from inappropriate and unwarranted and unrequired development.

Yours sincerely,

Eamonn Purcell

Kilian Kelly

Elaine Bailey

Chairperson

Secretary

Treasurer

Hollybrook Park Residents Association

81 Hollybrook Park,

Bray,

Co. Wicklow.

BRAY MD LAP

C153

Administrative Offices  
Planning Section  
Wicklow County Council

64 Giltspur wood,  
Killarney Rd.,  
Bray,  
Co. Wicklow



5-9-17

A Chava,

I have recently become aware of the rezoning of the land adjacent to Giltspur wood and the proposal to build a number of houses on this land.

I would appeal to you to reconsider this proposal for a number of reasons. Firstly, such building work would lead to considerable construction traffic going through the estate for approx one year. There are currently large numbers of young children living on the estate and this would be a major concern in terms of health and safety. A similar proposal which was approved in 2001/2002 and which involved breaking through another cul de sac in the estate lead to a number of injuries

sustained to children who entered the building site. Understandably we do not want a repetition of this.

Secondly, there is a 600 year old protected structure on the land, namely, Oldcourt Castle and in addition there is a tree preservation order on the trees on the rezoned land. To build on this land would amount to interfering with a historical landmark and by felling the trees we would be destroying the "lungs" of Bray.

In addition, the traffic entering and exiting the estate on the Soldiers Road is already choked up. The current proposals would exacerbate this problem.

I hope that you will give my objections your serious consideration.

Is mise le meas,

Blána Holmes

64 Giltspur Wood

Killacrey Rd.

Bray

Co - Wicklow

• BRAY MID LAP

Cliona Holmes

64 Giltspur wood

Killarney Rd.,

Bray,

Co. Wicklow

**Leonora Earls**

**From:** Claire Hyland  
**Sent:** 15 September 2017 13:56  
**To:** Planning - Plan Review  
**Cc:** Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Edward Timmins MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Miriam Murphy; Cllr. Mary McDonald; Cllr. Tommy Annesley; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC  
**Subject:** Bray Municipal District Draft Local Area Plan 2017, dated August 2017

Dear Sir/Madam,

I would like to object to the inclusion of a proposed road (R08) to the east of Kilmacanogue in the above referenced draft plan.

I have a number of concerns which I've detailed below:

**1. The need for this road is unclear to me.**

I do appreciate the current access to petrol station, adjacent businesses and properties does need improvement. However an alternative viable proposal is provided by TII in their recently published report, M11/N11 Corridor Study, April 2017. Their proposal of a dedicated service road on and off the N11 at J8 is based on real life data on traffic volumes and incidents. Importantly their proposal can be implemented quickly and efficiently. Of note in the TII report they indicate the building of an additional road is of 'limited benefit' and 'superfluous' to other N11 improvements.

**2. The proposed route traverses the lower slopes of the Little Sugar Loaf**

We are privileged to have this beautiful natural resource so close to Dublin. This is walked regularly not only by residents of Kilmacanogue, but by Dubliners escaping the city, and by those from further afield. This fact is acknowledged by the council in the LAP in Section 2.2.2 Physical Context, where it cites that Kilmacanogue's location between the Little and the Great Sugar Loaf makes it a popular destination for recreational users, and in Section 7.3, where it notes that both mountains are designated areas of Outstanding Natural Beauty.

It therefore seems contradictory to propose building a major road through this well loved amenity. While the LAP indicates that proposed road R08 is 'to serve zoned lands and properties currently accessed via the N11', this does not make clear that this includes not only the petrol station but a number of businesses using large trucks. This road therefore would not be a small road for local residents but would need to be substantial enough to accommodate re-fuelling tankers and other large vehicles.

This will not only affect those walking the Little Sugar Loaf and cause irreparable damage to the rich and varied wildlife, but cause a very obvious visual scar to all those approaching the village from Glendalough, or indeed those who have climbed the Great Sugar Loaf.

**3. As a resident of the eastern side of Kilmacanogue I'm concerned about the impact of any road on my property and knock on effects on my quality of life.**

The draft LAP acknowledges that the eastern side of the village has already been 'cut-off from services' by the construction of the N11. Any new road would further split the residences on the eastern side from each other, negatively impacting on village life. A number of properties, including my own, would be left

on a small 'island' of land between two large roads. This will lead to increased noise and light pollution, loss of privacy, and a negative impact on security.

I appreciate your consideration of my concerns, and ask that this proposed road be removed entirely from the proposed Bray Municipal District Local Area Plan and any associated plans.

Yours faithfully,

Claire Hyland

The Haven, Old Bohilla Lane, Kilmacanogue

**Leonora Earls**

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**From:** Mercedes Ipina  
**Sent:** 14 September 2017 14:17  
**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. Tom Fortune MCC; 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; Deputy John Brady; tom Galvin  
**Subject:** Rezoning of the Little Sugarloaf Mountains

Dear Wicklow Councillor,

I am writing to you regarding the rezoning of the little sugar loaf, off the Southern Cross Road. I am sure this is not the first letter of concern you receive on this matter, and I just wanted to join in with this email.

You are probably aware of all of the reasons for concern, and are many, such as:

- Car pollution due to the amount of extra cars needed for an area with no reliable public transport and no local supermarkets, playgrounds, amenities in general, denied for many years.
- Risk of flooding in particular on the Hollybrook state.
- Additional Traffic adding to an already congested area. I invite you to visit the Shouthern Cross Road on a Friday afternoon at 4pm.

With those in mind, I just want you to imagine a family living off the southern cross road, Hollybrook in particular. Is has been raining heavily during the night and more rain is expected the next day, you don't sleep at night thinking your house could be flooded, you are planning on waking up your kids half hour earlier to ensure they can make it to school on time, and you hope not to forget anything from the shop as another trip would cost you dear.

Now please imagine this is your family! Would you still vote yes to the rezoning?

I understand houses need to be built, but I believe there are many areas more suitable than up a mountain where so many families can be negatively affected by it. There is a very suitable site on the Southern Cross Road for sale for many years, where houses, supermarkets and playgrounds could be safely built and traffic diverted between the souther cross road and the Boghall road.

Thanks for your time reading this letter. I feel I did something for many families of this area and for those that hopefully won't come to live in the rezoned area and suffer from it.

Yours sincerely,

Mercedes Ipina  
 100 Swanbrook  
 SOUTHERN CROSS ROAD  
 Bray  
 CO. WICKLOW

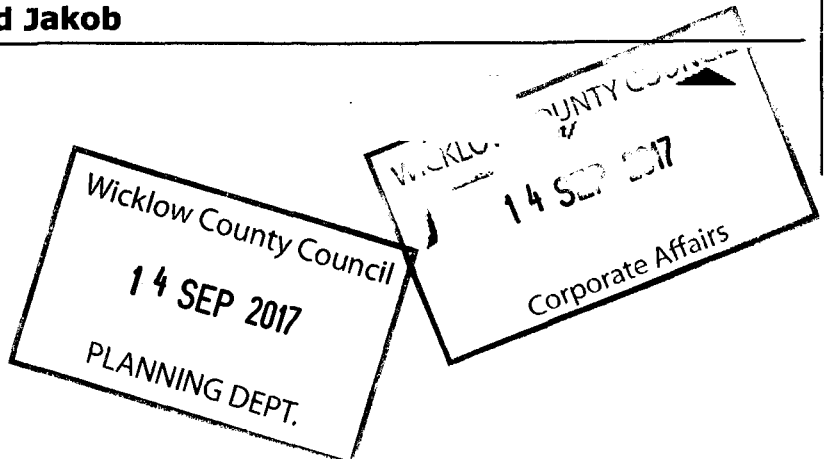


**Sonia and Bernhard Jakob**

26 Giltspur Wood  
Bray  
Co. Wicklow  
Ireland

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

Ref: BRAY MD LAP  
12<sup>th</sup> September 2017



Dear Administrative Officer:

We have recently learned that there is to be some rezoning of land in Bray, and a very small pocket of landlocked land, adjacent to our estate, may fall into this category.

As you can imagine, we are at a loss to understand why this little piece of land would be worth rezoning, as it would cause all kinds of problems and trouble which is totally unnecessary.

Our estate already has 90+ houses in it, and is already a busy place, and is a safe friendly environment for our children and neighbours.

If this pocket adjacent to us were to be rezoned, and subsequently built upon, it would cause uproar and unbalance the estate equilibrium and would bring nothing but instability for the many families who are living here.

There would be construction equipment driving through an already congested area, there would be disruption, it would no longer be safe for our children to play outside, not to mention the dust, dirt, noise and general upheaval.

Outside of our estate, is the Old Soldiers Road, which has already been made into a One-way street as the traffic problem was a major concern for all residents in this area.

There is currently a new development on this road, which will bring extra traffic, so it makes no sense, to increase this ratio even further.

In the morning, to get through the traffic lights onto Killamey Road is already a challenge, so any increase in traffic from more subsequent new housing would make this even worse.

Another consideration, is that the area adjacent to our estate, is currently a small green oasis, with a small river flowing through it, with old oak trees and there is a considerable amount of wildlife nestled here. Only this evening we spotted a Heron standing on the Green outside our house. There are also nesting Egrits in the woods beside us. It makes no sense to disrupt this nature balance and cause more stress on our environment in an already congested and built up area.

We are close to Old Court Castle, which is a protected building, Im sure there are laws or by-laws somewhere which state how close it is allowed to build within a site of a protected structure, this one being a castle, probably built by the Earl of Ormond in 1433.

Would it not be a better idea to preserve our heritage and keep it unspoilt where possible, instead of squashing a few houses into an already populated area, which will only cause infrastructural problems as well as integration problems?

There must be a better solution.

Please Planners, Plan wisely and well.

For Bray's sake, our own sake.

Thank you

Yours sincerely

Sonia Jakob

**Leonora Earls**

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**From:** Paul Kane  
**Sent:** 06 September 2017 20:26  
**To:** Planning - Plan Review  
**Subject:** Bray Draft Development Plan - possible rezoning of 2 plots of land at rere of Charnwood and Giltspur Wood

Sirs

I , and all members of my family strongly oppose the possibility of rezoning in this case , for the following reasons .

Traffic and Safety issues - Proposed development will mean more traffic in an already congested estate and will lead to more problems with parking issues , where there is already an issue with people parking for access to the schools nearby.. Also there would be additional traffic pressures at the junction on to the main Vevay Road, and throughout Charnwood, via the link roads already there which people use to park.

With the proposal , and if there were a through road , through Charnwood, the expectation would be that all/any traffic exiting from Tesco and the local schools , and heading for Killarney Road , would try to move through Charnwood , this is totally unsuitable for the existing residents in the estate .

Anti Social Behaviour- THERE ARE ALREADY ISSUES WITH SAME AND PEDESTRIAN ACCESS THROUGH THE BACK OF Charnwood AND ON TO Killarney Road . Also there have been many house break ins in recent times which would probably increase with additional access.

There are a number of "safe" areas in cul de sacs within Charnwood for smaller children at present , and these would be negated if there were to a be a larger volume of cars and pedestrians passing through the estate .

House Values - This is a settled estate dating from early 1970s , People have purchased their homes in a private estate , If there is a rezoning and social housing is part of a proposed development , this may effect the values of the existing properties within Charnwood

Yours Faithfully

Paul Kane  
100 Charnwood  
Bray  
6/9/2017

**Leonora Earls**

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**From:** Marie Kava agh  
**Sent:** 10 September 2017 17:31  
**To:** Planning - Plan Review  
**Subject:** REZONING OF LANDS ON THE SLOPES OF THE LITTLE SUGAR LOAF

Dear Sir/Madam

I wish to lodge an objection to the above and my reasons being:

The traffic level on the Southern Cross at a peak times is already at a very high level making exiting from Swanbrook/Earlscroft Estates extremely difficult.

I am twenty years a resident of Swanbrook and all the promises of shops and amenities for this area has NEVER happened !

I must object in the strongest possible terms to any building on the Little Sugar Loaf. This would be an act much regretted by future generations !!

Please leave Bray Head, Little Sugar Loaf and Big Sugar Loaf in it's natural beauty for everyone to enjoy.

Yours sincerely

Marie Kavanagh  
97 Swanbrook  
Bray

Sent from my iPad

C159

Leonora Earls

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**From:** adrienne keaveney [  
**Sent:** 14 September 2017 12:54  
**To:** Planning - Plan Review  
**Subject:** Objection Letters  
**Attachments:** Letter 2.pdf; Letter 3.pdf; Letter 4.pdf; Letter 5.pdf; Letter 6.pdf; Letter 7.pdf; Letter1.pdf

To whom it may concern,

Please accept the following letters of objection with regard to the Wicklow/Bray municipal district local area plan 2017 - Killruddery Estate.

I look forward to hearing from you.

Kind regards

Adrienne Keaveney

Wicklow County Council

15 SEP 2017

PLANNING DEPT.

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

**Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

**1. Natural Amenity:**

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

**2. The Character of Kilruddery Demesne:**

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

**3. Flooding:**

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

#### 4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

#### 5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

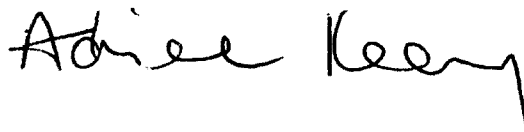
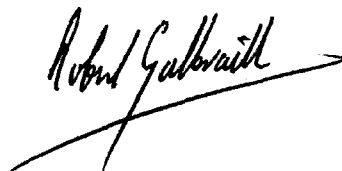
#### 6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed

Adrienne Keaveney  
Robert Galbraith  
118 Hollybrook Park



## Leonora Earls

---

**From:** myra kearney [  
**Sent:** 14 September 2017 10:32  
**Cc:** Cllr. Tommy Annesley; Planning - Plan Review; 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; Cllr. John Ryan MCC; 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:** Fwd: Bray Local Area Plan - Kilruddery Estate  
**Attachments:** D7D44B31-A20B-435A-9B07-118772E91426[165].png

To whom it may concern

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

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

New Residential zoning on lower slope of small sugarloaf.

New industrial Zoning backing onto the existing industrial estate

My family and I are residents of HollyBrook park for over 12 years. We the residents have been maintaining our beautiful green spaces including the woodland, trying to keep HollyBrook park a clean and safe environment for present and future families. The county council do not participate in the maintenance of HollyBrook Park.

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

I am aware that we have a housing crisis and need to urgently build more homes, Joe Behan advised us at the public meeting held, that old Fassaroe and the old Bray gold club area are zoned for building of houses, why go on to Sugarloaf and ruin a beautiful area?? there is a lot of land around that is not as scenic as this exact part you are proposing building on. There is the hideous open space the other side of the Southern Cross for example which the council sold to Nechouka in 2008 for development, nothing has been done with these lands?? Why can't the council purchase back the land (less the penalties they should have been paying for not developing) for most likely a lot less than you would have to pay for Kilruddery lands.

There are 4 large industrial units on the Boghall road which have been vacant for 10 years or more, A O Smiths, Pfizer, large warehouses beside Murphys undertakers, and Dell, that's with out all the small units that are vacant in beechwood close and in beside Aldi, so in my opinion there is no need for extra units,

There has been no infrastructure to the Southern cross area since the building of houses, we have very limited buses, no shops, no bins. no cycle lanes, it is one of the busiest roads in Bray for walkers and joggers and the upkeep in recent years have been a disgrace.

The traffic is a big issue, at present it can take up to 5 minutes to get out of Hollybrook with the volume of traffic on the Southern Cross, in the mornings going on the



school run is terrible with all the traffic coming in from Greystones, it can take up to 20-25 mins to get to the Wilton hotel roundabout, IF more houses and industrial units were to be built, the extra traffic would have the road at a stand still..

When we as residents in Hollybrook park had meetings, one of the main concerns that kept coming up is the flooding coming off the lands at the back of our estate from Kilruddery, residents have actual video footage of the flooding into their gardens, with extra housing this in my view would be worse.

The small Sugarloaf can be seen from all round and many people walk up and down it, exercise their dogs etc. It is a very used piece of parkland. It is a huge tourist attraction and that mainly because of its beautiful lands and the Sugarloaf I am actually shocked at the proposal to build on it.

I hope you will really re consider the consequences of such a plan.

Yours sincerely

Myra Kearney  
20 Hollybrook Park,  
Bray  
Co. Wicklow

**Leonora Earls**

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**From:** Colman Gags Kelly  
**Sent:** 14 September 2017 16:09  
**To:** Planning - Plan Review  
**Subject:** Wicklow County Development Plan 2016 - 2022 - Kilmacanogue

Dear Sir, Madam,

Could I please register my objection to the planned "new road" to the east of Kilmacanogue from the Bohilla Lane roundabout in the direction of Woodies roundabout in Bray.

I feel it is unnecessary. It would only be of benefit during rush hour traffic if at all. It would cut in to the bottom of the Little Sugarloaf which is an area of great natural beauty and used often by tourists and hill walkers.

If any pathway is to be build it should be a walking and/or cycle path linking Kilmacanogue village to Bray. At the moment it is very dangerous to walk through Kilmacanogue village, especially around the two garages.

On the east-side garage cars regularly use both the 1<sup>st</sup> and 2<sup>nd</sup> entrance here – at high speeds. The footpath is very narrow. If a bus is parked at the stop cars swerve around and pull in at high speed. Exiting is also a problem. (As I am sure you are aware).

On the west-side garage cars and delivery trucks regularly park on the road opposite the garage. Making it difficult for cars to rejoin the road back towards the South (not joining the N11).

There are also many drivers who use this slip road as a shortcut to bypass this stretch of N11 - not specifically a planning issue but worth noting.

Overall there is a feeling that Kilmacanogue is not really a village – just two petrol stations with the N11 cutting through it at full speed. More consideration should be given to the residents everyday life. How can they walk their kids to school safely? Where can they go for a cycle? Where is the nearest doctors? Where is the community centre?

Le meas.

Colman Kelly.

**Leonora Earls**

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**From:** Dermot Kelly  
**Sent:** 06 September 2017 20:55  
**To:** Planning - Admin  
**Subject:** Housing dDevelopment

Dear sir i wish to object to the developement at the back of hollybrook park where i reside.

The reason being due to many enviornment problems and it would not contribute to the existing estate'

yours sincerely dermot kelly 147 hollybrook park.

C162

WICKLOW COUNTY COUNCIL  
15 SEP 2017  
PLANNING DEPT.

**Barr na Coille  
Kilmacanogue  
Co. Wicklow  
A98 PX54  
14thSept17**

**RE: KILMACANOGUE PROPOSED  
ROAD PLAN ETC**

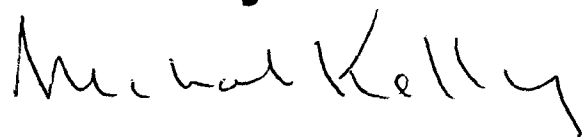
**TO CHRISTOPHER FOX AND ALL  
COUNCILLORS WHOM IT MAY CONCERN**

**I really am so very angry that those whom we voted to represent us seem to have lost track of that and are blinded by a dictum from above I suggest a step back is necessary What about a shuttle train serving from Bray thro Kilcoole and all the little villages to Arklow and then concentrating on the required enormous development around this service If you develop and might I say change the whole ambience of our village Kilmacanogue surely this will only lead to more congestion in our area Where to from the woodies roundabout if you are trying to get to Dublin City Perhaps the planners feel I am missing something I am sure that you are aware that there is a wonderful valley running from the end of the Herbert road to Ballywaltrim and I am led**

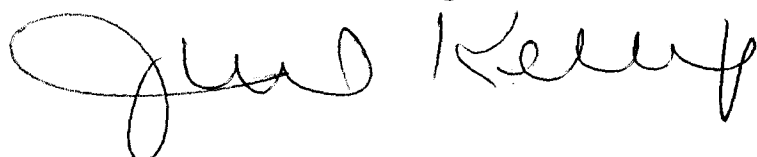
**to believe that the Council own part of this  
Anyway back to Kilmacanogue The marvellous  
green fields on the Eastern side have become  
the focus of attention just because they are  
there They have been home to sheep and  
lambs, cattle, a wonderful five pointer stag is  
now visiting there as are many deer A  
sparrow hawk and indeed a few frequently  
appear too and this year hay was made As  
many years as I have known and indeed many  
many before my time this has been the way of  
these fields and now proposed CONCRETE is  
what is called progress Yes of course there  
is a need for more houses but also there is a  
need for imaginative thinking  
Surely it is not foolish to wish to retain a  
country village to be there for generations to  
come No one can argue against the fact that  
Kilmacanogue is in a spectacularly beautiful part  
of Wicklow and surely that must hold some  
sway**

***To plagiarise Yeats Thread softly before you  
thread on us***

**Yours sincerely**



**Michael and June Kelly**



**an acknowledge of receipt of this letter would  
be appreciated thank you**

**Leonora Earls**

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**From:** Lisa Kelly [mailto:lisa.kelly@wcc.ie]  
**Sent:** 11 September 2017 14:02  
**To:** Planning - Plan Review  
**Subject:** Opposing the rezoning of lands on Kilruddery estate

Dear Planning

My husband and I strongly oppose this rezoning of lands on Kilruddery estate, and would appeal to you not to vote for this.

In particular

- 1) opposed to the zoning that would allow for 240 new Residential units
- 2) to insist that the Green belt zoning is to be re-instated on the fields above and to the east of Deepdales

We have lived in Deepdales now for 12 years.

Kind regards

Lisa Kelly and Christopher Jenkins  
Residents of Deepdales, Southern Cross Road, Bray, Co Wicklow

**Leonora Earls**

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**From:** Andrea Kennedy [mailto:andrea.kennedy@bray.ie]  
**Sent:** 11 September 2017 21:09  
**To:** Planning - Plan Review  
**Subject:** bray town plan 2017

Dear Sir,

I would like to outline my opposition to certain aspects of the bray town plan.

1. Increased industrial and residential housing in Kilruddery.
2. Residential building on bray golf club land beside the Dargle river.

The reasons for 1:

Hazard of flooding - already each year our back gardens are waterlogged and certain gardens have been flooded due to the river at the back of Hollybrook park. Further building upland will damage the natural drainage and risk further flooding.

Lack of amenities and public transport - we still have no shops on the Southern cross, no weekend bus service and minimal service during the week. Further housing will lead to even worse traffic delays - currently both ends of the southern cross are at a standstill at rush hours morning and evening.

There are already three unused industrial areas on the boghall road - the old Dell site, schering plough and AO smiths.

Damage to a beautiful natural amentity.

The reasons for 2:

Having previously lived on the Dargle during the flooding of Hurricane charlie and although I realise the flood relief scheme is nearly completed I would question anyone building houses on what is still the natural floodplain. Every winter it is waterlogged also.

I would appreciate you taking on my submission and not use these areas for future development.

Kind Regards,

Andrea Kennedy  
110 Hollybrook Park  
Bray  
Co Wicklow



**Leonora Earls**

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**From:** Sonja Luescher Keogh  
**Sent:** 14 September 2017 20:51  
**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  
**Subject:** Objection to proposed change of zoning at Killruddery

To whom it may concern:

We are writing as residents of Hollybrook Park to express our objection to the proposed change of planning in Killruddery Estate

We would like to object to the proposal for the following reasons:

- 1) The plan would involve creeping development of the Sugarloaf which is a local amenity and location of natural beauty which is a location of natural beauty which should be protected.
- 2) The increase in traffic volume, which is already very high at peak times, would make leaving our estate and travelling to Bray or the N11 problematic.
- 3) Flood risk: there is already evidence of flooding among houses in Hollybrook backing at Killruddery. We estimate that further building and disruption of the natural environment and runoff would increase the likelihood of flooding in the future.
- 4) Lack of amenities: The Southern Cross Road has a severe shortage of simple amenities such as shops, a café and an open community space (that are not sports pitches) within walking distance. There is also no proper bus service that runs reliably during the week and on weekends. Adding a lot more people to the area is absurd when there is a lack of amenities even for the current inhabitants.
- 5) The secretive nature of this proposal leaves a lot of questions about the democratic foundation of the Council in general, and this plan in particular.

Yours sincerely,

Sonja Lüscher Keogh & Mark Keogh  
79 Hollybrook Park  
Bray, Co. Wicklow

## **Leonora Earls**

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**From:** I  
**Sent:** 15 September 2017 13:53  
**To:** my gmail  
**Cc:** Planning - Plan Review; 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  
**Subject:** Objection to proposed change of zoning at Killruddery

### To whom it may concern:

We are writing as residents of Hollybrook Park to express our objection to the proposed change of planning in Killruddery Estate

We would like to object to the proposal for the following reasons:

- 1) The plan would involve creeping development of the Sugarloaf which is a local amenity and location of natural beauty which is a location of natural beauty which should be protected.
- 2) The increase in traffic volume, which is already very high at peak times, would make leaving our estate and travelling to Bray or the N11 problematic.
- 3) Flood risk: there is already evidence of flooding among houses in Hollybrook backing at Killruddery. We estimate that further building and disruption of the natural environment and runoff would increase the likelihood of flooding in the future.
- 4) Lack of amenities: The Southern Cross Road has a severe shortage of simple amenities such as shops, a café and an open community space (that are not sports pitches) within walking distance. There is also no proper bus service that runs reliably during the week and on weekends. Adding a lot more people to the area is absurd when there is a lack of amenities even for the current inhabitants.
- 5) The secretive nature of this proposal leaves a lot of questions about the democratic foundation of the Council in general, and this plan in particular.

Yours sincerely,

Sonja Lüscher Keogh & Mark Keogh  
79 Hollybrook Park  
Bray, Co. Wicklow  
Sent from my iPhone

**Leonora Earls**

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**From:** ann o brien kinlough [  
**Sent:** 11 September 2017 13:39  
**To:** Planning - Plan Review  
**Subject:** Objection to rezoning land southern cross Bray

Dear Sir/ Madam,

We would like to object to rezoning of lands on southern cross rd.  
The area already has a large volume of traffic .  
We live at 14 Earlscroft, southern cross, Bray.

Ann& William Kinlough.

Sent from my iPhone

**Leonora Earls**

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**From:** Hilary Kitson  
**Sent:** 11 September 2017 21:36  
**To:** Planning - Plan Review  
**Cc:** Brian; 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:** Submission of Objection to proposed rezoning of lands  
**Attachments:** LAP Objection Submission.docx

To the Administrative Officer and all Local Councillors,

Please find attached our submission objecting to the proposed rezoning of lands on the Killruddery estate as set out in the Bray Municipal District Local Area Plan 2017.

Kind regards,

Brian & Hilary Kitson  
111 Deepdales, Southern Cross Road, Bray

111 Deepdales  
Southern Cross Road  
Bray  
Co Wicklow

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

10<sup>th</sup> September 2017

**Re: Submission in relation to the rezoning of lands as set out in the Bray Municipal District Local Area Plan 2017**

To the Administrative Officer and all local councillors,

We are writing to submit our objection to the proposed rezoning of Killruddery lands and environs, specifically Little Sugar Loaf and the lands along the Southern Cross Road, as set out in the Bray Municipal District Local Area Plan 2017. Our objection is based on the following three points:

1. Loss of amenity

Little Sugar Loaf and its environs is an area of outstanding natural beauty and as such was granted Special Area Conservation Status, although the Special Amenity Area Order put in place in 2008 has never been implemented by Wicklow County Council, much to our alarm. We (as a family) use this area on an almost daily basis for walks and trail running, and it is an area that has been enjoyed for generations by residents and tourists alike. If the diggers move in we will never get it back again – we will have lost something truly special. We despair at the idea of further development creeping along the lower slopes of Little Sugar loaf and the needless transformation of a beautiful rural area into an urban one. We have an opportunity now, as a community, to protect this wonderful natural environment and the wildlife that inhabits it.

2. Traffic congestion

The Southern Cross Road is already heavily over-used during peak periods. It can take a long time to get onto the road from our estate during morning rush-hour in particular, and the journey time to our local school increases fourfold or more. Furthermore, the combination of these high traffic volumes with the lack of a cycle lane makes it very dangerous for cyclists. The rezoning of these lands and the resultant development will notably worsen what is already a significant issue for local residents.

### 3. Flooding

The development of the upper lands will significantly increase the risk of flooding and landslide due to loss of infiltration on the lower mountain. This in turn will be further aggravated by climate change and incidences of deluge where normal drainage is overwhelmed, as happened recently in Donegal. This is of grave concern, particularly in light of Wicklow County Council's Strategic Flood Risk Assessment 2016-2022, which offers no reassurance whatsoever:

*"All information in relation to flood risk may be substantially altered in light of future data, new methodologies and/or analysis. As a result, all landowners and developers are advised that Wicklow County Council can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments." (pg. 29)*

As regular users of Giltspur Lane (which runs up behind our house), we have witnessed persistent flooding of this roadway during spells of heavy rain (particularly in 2015) when the floods of water run down covering the full width of the lane.

We object to these plans in the strongest terms.

Yours faithfully,

Brian Kitson \_\_\_\_\_

Hilary Kitson

**Leonora Earls**

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**From:** Ken Knox  
**Sent:** 08 September 2017 11:32  
**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  
**Subject:** Rezoning of lands on Southern Cross

To whom it concerns,  
I am a resident of the Southern Cross area.  
My address is :  
31 Deepdales,  
Bray.

I object to the rezoning of lands on the Southern cross road

We are concerned at the high level of traffic on the Southern Cross road at present and how difficult it is to access the main road at busy times without having an additional 300 plus cars trying to access it from this one point also.

Since the estates were built in 1997, there has been numerous promises of retail outlets and local amenities and still 20 years later here we are with no local amenities within walking distance, no playground or green areas for the children and very limited and very poor quality public transport.

Also the Minister for the Environment, John Gormley has requested and already directed Wicklow County Council in April 2008 to progress the Special Amenity Area Orders (in accordance with Sections 202 and 203 of the Planning and Development Act, 2000) for the Sugarloaf areas in North Wicklow. SAAO's are made for areas of outstanding beauty or areas of special recreational value, having regard to any benefits for nature conservation. This rezoning would appear to be in breach of this ministerial order.

Yours etc.

Ken Knox  
31 Deepdales,  
Bray,  
Co. Wicklow.



**Leonora Earls**

---

**From:** Stanislav Kosachev [mailto:stkosach@icloud.com]  
**Sent:** 14 September 2017 12:06  
**To:** Planning - Plan Review  
**Subject:** Rezoning of the Green Belt Land on the Little Sugar Loaf

Dear Wicklow Plan Review Team,

I want to express my concern about the proposed rezoning of the Green Belt land on the Little Sugar Loaf.

This development will increase a risk of flooding in the area, even worse traffic and a lower standard of living for people. Residents of Southern Cross are suffering already with a very limited public transport, lack of local schools and shops.

This is not a proper location for additional development and I believe the proposed rezoning can be scrapped.

Best regards,

Stanislav Kosachev

145 Hollybrook Park,  
Bray,  
Co. Wicklow

## Leonora Earls

---

**From:** Stanislav Kosachev [stanislav.kosachev@wki.ie]  
**Sent:** 14 September 2017 09:45  
**To:** Planning - Admin  
**Subject:** Rezoning of the Green Belt Land on the Little Sugar Loaf

Dear Wicklow Planing Team,

I want to express my concern about the proposed rezoning of the Green Belt land on the Little Sugar Loaf.

This development will increase a risk of flooding in the area, even worse traffic and a lower standard of living for people. Residents of Southern Cross are suffering already with a very limited public transport, lack of local schools and shops.

This is not a proper location for additional development and I believe the proposed rezoning can be scrapped.

Best regards,

Stanislav Kosachev

145 Hollybrook Park,  
Bray,  
Co. Wicklow

## Carmel Canterbury

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**From:** Avril Lamplugh |  
**Sent:** 23 August 2017 11:45  
**To:** Planning - Plan Review  
**Subject:** Objection to Rezoning beside Giltspur Wood

To Whom it May Concern

I am writing to express my dismay that there are plans in place to rezone the land beside us in Giltspur Wood. We have lived very happily in Giltspur Wood for 17 years and would not be happy at all that houses would be built in the beautiful wooded area beside us and that a through road would have to come through our development to access these houses.

Last night, Councillors Joe Behan, Steven Matthews and TD John Brady very kindly gave up their time to meet with all the concerned residents in Giltspur Wood. Over 60 people attended the meeting. It was thanks to Joe Behan that we heard about the rezoning in the first place.

There are a number of reasons why we vehemently object to the plans for rezoning the land for housing:

- Traffic safety - the roads around Giltspur Wood simply cannot take any more traffic.
- The safety of the children who live in the development is paramount. The green spaces are their playgrounds and are vital for them to play on.
- There is a wonderful historic castle in that area that should remain and be maintained better.
- Breaking through to this area would end the privacy and safe area that we have enjoyed for over 20 years.
- There is a definite flood risk, as our back gardens get flooded as it is in heavy rains.

Currently, this land is very overgrown and unsafe to walk in. It lends itself to anti-social behaviour too. It could be a nice area for a riverwalk?

I would be hugely concerned about the effect that building houses in this area would have on the residents of Giltspur Wood. I am asking you to take all of our concerns on board and strongly object to the plans that have been put forward.

Sincerely,

Jim and Avril Lamplugh  
No. 93 Giltspur Wood

--

Avril Lamplugh  
JUNIOR SCHOOL HEAD  
Alexandra College  
Milltown  
Dublin 6



w: [www.alexandracollege.ie](http://www.alexandracollege.ie) | t: @alexcollege | f: [facebook.com/AlexCollDublin](https://www.facebook.com/AlexCollDublin)

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**Thank You.**

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

Wicklow County Council  
12 SEP 2017  
PLANNING DEPT.

**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) Rosalind Lane  
Lane.

Date 9/9/2017

Residents' Address 174 CHARNWOOD, BBAH

Address must be included on petition

①

WICKLOW COUNTY COUNCIL  
12 SEP 2017  
Corporate Affairs

see p.2

**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. Rosalind Lane

D.D. 9/9/2017

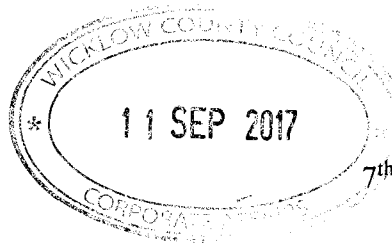
Address in Charnwood. 174 (Your address must be included)

(END ROW)

(2)

C171

Michael Lawlor  
26 Rectory Slopes  
Bray  
Co. Wicklow



7<sup>th</sup> September 2017

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

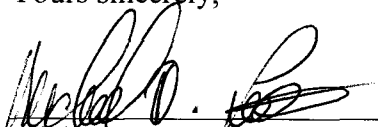
**Re: The Bray Municipal District Local Area Plan (2017-2023)**

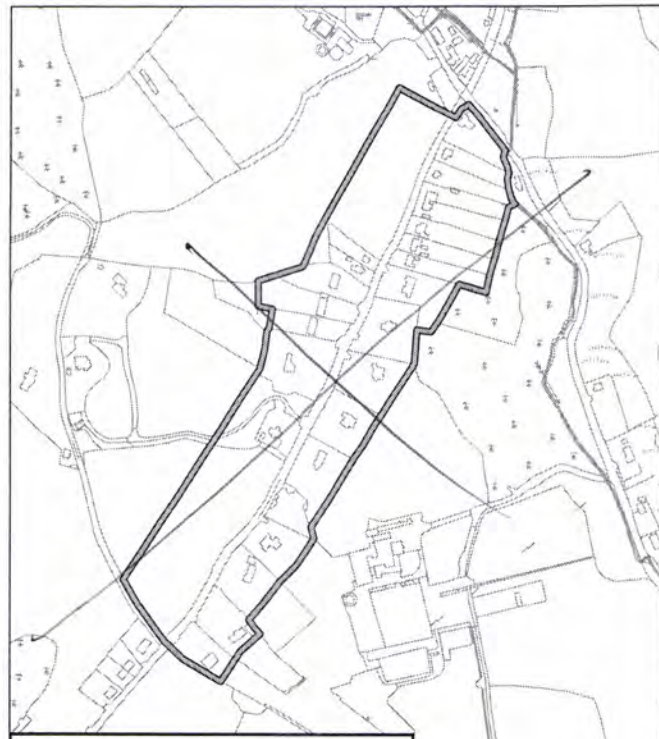
A Chara,

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

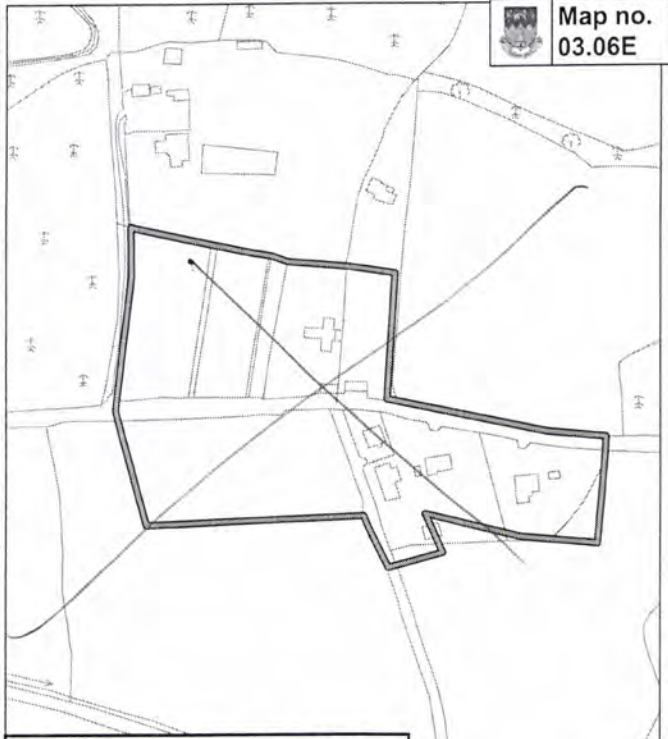
Please find attached a map of Kilmurray (Kilmacanogue) settlement boundary rural cluster. Can you please include the area bounded in red and marked a, b, c & d in the 2017 to 2023 Bray Municipal Local Area plan.

Yours sincerely,

  
Michael Lawlor



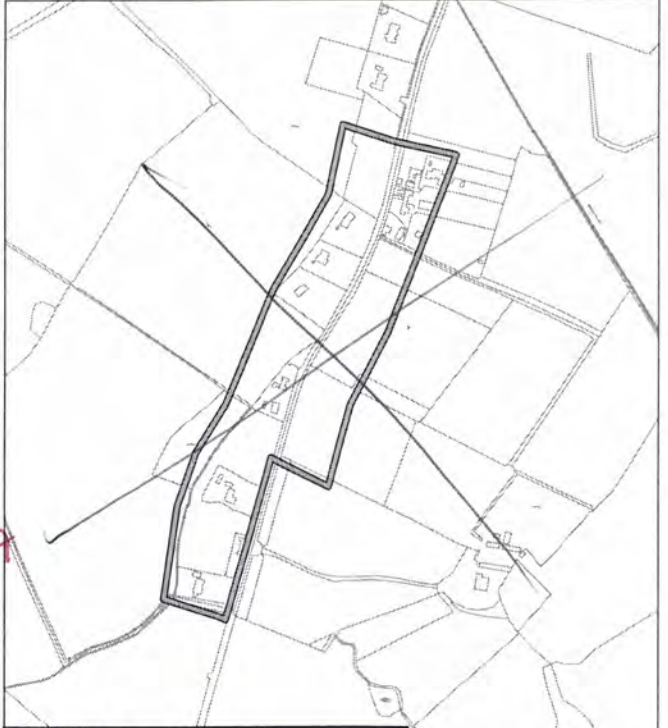
**KILLISKEY**



**KILMURRAY (NTMK)**



**KILMURRAY (KILMAC)**



**KINGSTON**

**Settlement Boundaries  
Rural Clusters**

DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022



SETTLEMENT BOUNDARIES



Wicklow County Council  
Planning Department

Maps Not To Scale

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2015/35/CCMA/Wicklow County Council



Ref: Bray MDLAP



C172

John Nolan, Sandra Lawlor,  
88, Giltspur Wood,  
Bray, Co. Wicklow  
13-9-17.

Dear Administrative Officer,

We are writing to make a submission in objection to the rezoning of land, adjacent to Oldcart 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 MDLAP 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 20 years

b) The popular and child friendly green area is essentially the playground of the estate,

c) Access to the land would bring large amounts of traffic directly beside the green area bringing an increased risk to child safety.

d) Any construction required on the proposed rezoned land would result in large amounts of heavy vehicles and construction traffic going through the existing estate for a prolonged period.

e) Traffic congestion

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

f) Wildlife

The proposed rezoned field and the surrounding land supports a rich and diverse set of wildlife,

I myself have spotted fox, bats and various breeds of birds both local and migrating.

9) 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.

10) Flood Risk.

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

11) 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.

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

Yours sincerely,

John Nolan, Sandra Lawlor  
Concerned Residents Gillespie Wood.

**Leonora Earls**

---

**From:** alazarenco  
**Sent:** 03 September 2017 13:30  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017

Dear Administrative Officer,

My husband and I are writing to you with regards to the proposed Land use zoning around Kilruddery - Southern Cross Road

We reside in 27 Hollybrook Park and we are strongly opposing and do not agree with the proposal for number of reasons;

- we reside at this address since 2013 and I believe that public transport was due to be facilitated for this area which as of this moment is not provided.
- As other young mothers when I had my babe and I needed something from pharmacy or shop - I had to walk for miles in to matter what weather to the shops as there are no shops as there was promised to be.
- When we go out for lovely walk on the Southern Cross Road we are facing a lot of rubbish and dog litter as there is not a single bin on the road where people can dispose their rubbish.
- The lack of public transport brings to a huge traffic problem on Southern Cross

Adding 240 residential units to this area is going to be crucial negative impact on all of those already big issues.

Many thanks

Ion and Angela Lazarenco

**Leonora Earls**

---

**From:** Joanna Lenehan  
**Sent:** 15 September 2017 16:56  
**To:** Planning - Plan Review  
**Subject:** Proposed rezoning of Kilruddery

To whom it may concern,

I would like to object to the proposed rezoning of some of the Killruddery land.

My reasons for this include the following:

- lack of public consultation
- lack of local facilities for existing residents
- very poor local public transport
- impact on local traffic.

Regards  
Joanna Lenehan  
3 Earlscroft  
Bray  
Co. Wicklow

CL75

**Leonora Earls**

---

**From:** David Freeland [mailto:d.freeland@mhplanning.ie]  
**Sent:** 14 September 2017 15:22  
**To:** Planning - Plan Review  
**Cc:** Paula Galvin  
**Subject:** Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** RPT\_170914\_AOSmith\_BrayLAP\_Submission\_Final.pdf

Dear Sir/Madam,

Please find attached our submission in respect of the above matter on behalf of Lidl Ireland GmbH. Our Client welcomes the opportunity to engage with the Planning Authority in these matters and trust that due consideration will be taken of this submission. Should you have any queries or difficulty in viewing the attachment, please do not hesitate to contact me.

Please can you confirm successful receipt of this submission.

Kind Regards,

David

David Freeland  
Planning Consultant

McCutcheon Halley  
CHARTERED  
CONSULTANTS

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# Bray Municipal District Draft Local Area Plan 2017

Submission in respect of the former 'A.O. Smith' site, Boghall Road, Bray

September 2017



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## 1. Introduction

This submission is made on behalf of Lidl Ireland GmbH who recently submitted a planning application (Reg. Ref 17/469) to Wicklow County Council for development of a portion (1.13 hectares) of the 'AO Smith' site, Boghall Road, Bray, Co. Wicklow.



**FIGURE 1: A.O. MASTERPLAN FOR 'AO SMITH SITE': INDICATIVE PROPOSAL SUBMITTED UNDER REG. REF. 17/469**

Our Client welcomes this opportunity to engage with the Council regarding the preparation of the Local Area Plan (LAP) for the Bray Municipal District. Positive engagement between the Council and landowners has been critical to the successful development of Bray and the continuation of same will be vital to securing the best return on available development lands and the parallel delivery of the overall vision and development strategy, alongside wider sustainability objectives.

We would highlight that McCutcheon Halley previously made a submission on behalf of Lidl Ireland GmbH in respect of the 'AO Smith' site at the pre-draft plan preparation stage. This information is presented in the submission (see **Appendix 1**) and remains valid in the context of this current public consultation.

Our submission aims to highlight how our Client's current proposal would contribute to the objectives presented for retail and economic development in the County and would act as a catalyst for the regeneration of this 'Opportunity Site' in the immediate future.

## 2. Site Context

The subject property is located in an expansive and growing residential neighbourhood in the southwest of Bray. Both the Killarney Road and the Boghall Road serve as major transport arteries in the southern area of Bray, providing ease of access for numerous transport modes. Dublin Bus Route 45A serves the Boghall Road and provides services towards Bray town centre, Dún Laoghaire to the north and Kilmacanogue to the south. Dublin Bus Route 145 also operates along the Kilbride Lane and Killarney Road proximate to the site, providing frequent connections with south Dublin city, Dublin city centre and terminates at Heuston Station. The Bus Éireann Route 133 operates stops along the Killarney Road and provides hourly connections between Bray town centre and other Wicklow towns to the south. The existing cycle paths along Boghall Road and the Killarney Road are designated as primary cycle routes within the *Greater Dublin Area Cycle Network Plan*.



The site is over 1.6km from the town centre in Bray and over 2.5km from Bray Dart Station. As such, the area it is not within easy walking distance of the town centre for most residents in the area. As a consequence, adjoining the subject site a local neighbourhood centre exists. This comprises a host of local services including a Print Shop, City Tyres.ie, Family Butcher's, a Surgery, Centra Off-License and Convenience Store, Boghall Pharmacy, Regal Fare Take-Away and Domino's Pizza. The Neighbourhood centre has low vacancy levels, reflective of the market conditions and the immediate available local retail expenditure. Demand for parking within the centres car park is generally quite high with some cross-visitation with neighbouring uses (church, schools, parks etc.). All indications suggest that the market exists to expand the role and performance of this neighbourhood centre, particularly considering its distance from the town centre and other neighbouring centres and the increase in the local population.

The surrounding area comprises a range of local services including schools, community centres, employment uses, recreational grounds and retail warehousing. There are also a small parade of services including a launderette, post office/convenience store and hairdressers on Kilbride Lane to the northwest of the site.

Located within an inner-urban location, the environmental and heritage context for the site reveals significant potential for redevelopment from a planning perspective, but this has failed to occur as yet, for reasons highlighted below.

### 3. Site Zoning/Planning History

The subject site of 1.13 hectares constitutes a brownfield site, encompassing a vacant industrial building (c.4,600 sq.m) from which the A.O. Smith manufacturing facility operated until 2005, with the loss of 140 jobs. The site has lay vacant for the past 12 years including through the timeframe of the current Bray Town Development Plan (BTDP) 2011-2017. In 2014, Local Councillors sought to place the site on the derelict site register.

The subject lands are currently zoned 'EMP1' *"to provide for economic development and employment"* and the entire A.O. Smith site is identified as 'Opportunity Site 7' in the BTDP, specifically for the following purposes: -

*"Predominantly employment use development. Industry/office/ and science and technology based uses in the main with the option of neighbourhood services /discount foodstore. The site is considered suitable for the location of taller buildings up to 5 storeys in height. Max Plot Ratio 1.5."*

On 'EMP1' zoned lands, the following uses are 'Permitted in Principle': -

*"Crèche/Nursery, Enterprise Centre, Industry-Light, Industry-Other, Offices, Open Space, Private Garages, Public Services, Recycling facilities, Science and Technology Based Industry, Training Facility"*.

The following uses are 'Not Normally Permitted but Open for Consideration' on 'EMP1' zoned lands: -

*"Advertisements and Advertising Structure, Community Facility, Garden Centre, Motor Sales Outlet, Residential, Retail Warehouse, Cash and Carry, Car Park, Service Garage, Warehousing, Motor Fuel Filling Station"*.

Land uses designated as 'Not Normally Permitted but Open for Consideration' are not normally acceptable according to the Development Plan, which places severe restrictions on the possibility of introducing a range of uses on the site based on current zoning parameters.

We understand that under the current zoning parameters the Council sought to ensure that 'employment-generating' uses predominate the redevelopment of the AO Smith site. The fact that there has been no application for permission to develop uses listed as 'permitted in principle' or 'open to consideration' is evidence that there is no market demand. This was highlighted by WCC in the pre-draft stage *Issues Paper* which

specifically referenced the A.O. Smith site and recognised that its 'opportunity status' has not stimulated development and invited submissions as follows:

*While many of these sites are identified in the current Bray plan as opportunity sites, this has not stimulated development. What can be done to promote development of these key sites? What type of uses should be promoted on these sites – could a mix of high density residential/office uses be considered on certain sites?" (p. 7).*

The owner of the site, DM Properties, have engaged property advisers, who work proactively on their behalf to promote the site for development. While the 2008 economic downturn undoubtedly impacted on the development potential of the subject site, the State's recession ended some 4 years ago and to date, the only interest shown by prospective developers that has translated into the making of an application for permission is from our Client, Lidl Ireland GmbH, and relates to the potential to avail of the option to develop a discount foodstore provided for in the current zoning.

2No. applications for permission to develop a supermarket (discount foodstore) have been made to WCC in the recent past. The first application (Reg. Ref. 16/487) was made by DM Properties, owners of the A.O. Smith site in May 2016 for the demolition of the existing buildings on site and the construction of a discount foodstore/supermarket. The application sought to reinvigorate this 'opportunity site' and to address vacancy and incentivise brownfield development. In assessing the proposal, the Planning Authority raised concerns that the proposal did not provide employment uses in the first phase of the redevelopment of the A.O. Smith site. The Applicant set out that that the supermarket could act as the catalyst for the development of the remainder of the site, although concerns regarding the viability of significant scale of employment uses on the site were presented.

Additionally, a Masterplan accompanied the application demonstrating how the remainder of the A.O. Smith site could be developed and how the subject proposal would tie in with potential future uses on the site. The Masterplan indicated potential future uses of the wider site in line with the land use zoning parameters. The Plan highlighted that:

*"The approach and purpose of this Masterplan is to set out an indicative layout for the overall, comprehensive development of the AO Smith lands. The Masterplan is not a binding blue print but rather is a means of formulating a coherent strategy that is adaptable over time. The main aim of the Masterplan is to provide a suitable and logical location for the foodstore/discount foodstore. There is an immediate market for a foodstore and it would be compliant with the objectives for the site, so logically it should be facilitated early in the site's development, subject to other planning and environmental factors" (p. 9).*

This statement emphasises DM Properties doubt based on professional advice that pure employment uses could reasonably be attracted to the site.

In June 2016 planning permission was refused for the proposed development for 3No. reasons including *inter alia*;

1. The failure to provide employment uses as part of the development, underutilisation of the 'opportunity site' and integration with the wider A.O. Smith lands.
2. Impact on the vitality of the adjacent neighbourhood centre.
3. Justification for the inclusion of an off-licence.

### 3.1. Current Planning Application (Reg. Ref. 17/469)

Lidl Ireland GmbH applied for permission to Wicklow County Council for development of 1.13 hectares of the A.O. Smith site in April 2017. The proposed development comprises the demolition of the existing industrial premises (c.4,638sq.m.) and security hut (c.14sq.m.) to make way for the construction of a two-storey unit to accommodate a discount foodstore (c. 1498 sq.m), office accommodation (c.815 sq. m), shared facilities (c.124 sq.m) and undercroft parking (1853 sq.m) with a maximum height of c.10.058m. The proposal includes the



construction of an entrance on the Killarney Business Park Road and new link road (c. 217m) connecting the Killarney Road Business Park with Boghall Road.

A Masterplan accompanied the application and provides an indicative proposal of how the remaining lands might be developed for employment uses by other interested parties in the future. The conceptual design was developed in conjunction with TWN Properties in order to ensure the proposed uses and size of the units were in keeping with the current economic potential of the site. The plan envisages a site capable of accommodating 11No. buildings (in addition to the subject proposal (2,437 sq.m) and demonstrates that c.13,650 sq.m of other 'permitted in principle' employment space could be accommodated on the wider AO Smith site.

The proposed development is framed having regard to the reasons for refusal issued by WCC under Reg. Ref. 16/487 as outlined in the preceding section. In particular, our Client sought to address the concerns of the Planning Authority regarding the provision of employment uses in Phase 1 and the integration with the wider site.

The 'Lidl Store' incorporates commercial office space for third party use with a gross floor area of 815 sq.m. It is anticipated that this proposed high-quality office space would accommodate up to 50 employees. This is in addition to the 20No. permanent positions that would be realised during the operational phase of the supermarket. In total, the proposed development would facilitate 70No. full time employment positions at the A.O Smith site, this equates to 50% of the jobs lost when the plant closed in 2005.

In addition, Lidl intend to develop the proposed link road (c. 0.16ha) to the Killarney Road in parallel with the store and office development. The proposed distributor road is being delivered by our Client to service both the proposed Lidl store and the wider AO Smith site. Subject to consent the road would be delivered in parallel with the proposed supermarket. It is considered that the road would significantly enhance the development potential of this 'Opportunity Site'; delivering a critical piece of infrastructure which will provide a foundation for future development. This road would act as a catalyst for the regeneration of the wider A.O Smith site, which have been vacant for some 12 years and would assist with alleviating local traffic constraints.

The foul drainage philosophy presented in the application is designed to incorporate the full AO Smith site and the proposed infrastructure would accommodate all the units proposed within the Masterplan. The delivery of a serviced site would make the wider landholding extremely attractive to potential developers.

Furthermore, the proposed surface level car parking, c.0.11ha, will be a shared space servicing the proposed office uses and the wider AO Smith site.

While the application encompasses a site area of 1.13 hectares, it is noteworthy that the shared facilities (roads and carparking) reduce this to 0.86 hectares, or c.28% of the overall A.O. Smith site. This is further reduced if the area assigned to public realm is incorporated.

The application includes a retail impact assessment based on a 15-minute walk time as agreed with the Planning Authority. The assessment concludes that this proposed development site represents the best location within the town to provide a discount foodstore of this scale. Based on the conservative approach to anticipated population and expenditure growth, the net impact of the expansion of this shop in the horizon year of 2019 is negligible and there is no anticipated impact on the existing town centre or other retailers within the catchment or wider Bray town area.

## 4. Current Planning Context

### 4.1 Wicklow County Development Plan 2016-2022

We note that owing to changes in Local Government, the forthcoming LAP must be consistent with the provisions contained within the Wicklow County Development Plan (WCDP) 2016-2022.

Bray is given the highest level of priority in the Core and Settlement Strategies contained in the *Wicklow County Development Plan (CDP) 2016-2022*. The CDP sets out ambitious levels of population growth for Bray and





this is understood to reflect its position on an existing rail line, future infrastructural upgrades and the town's wider strategic planning role. Table 2.9 of the CDP also places Bray in the top tier of the Economic Development Hierarchy, where it functions as the 'main attractor for major investment' in the County, with investment targets for 'foreign direct investment' and 'people-intensive, knowledge-based industries'.

Table 6.1 of the CDP sets out the retail hierarchy for the County in the context of the GDA and includes Bray in Level 2 of the hierarchy. The Boghall Road Neighbourhood Centre is listed on Level 4 of the hierarchy as a 'Neighbourhood Centre' for the Bray Area. The Plan also sets out ambitious additional levels of retail floorspace to be attracted into Bray, and while we understand that this is primarily aimed at town centre enhancement and growth, there has to be scope to absorb additional floorspace into areas peripheral to the town centres, such as the subject site, to serve the day to day needs of residents and employees of the area. Given the fact that the existing neighbourhood centre is fully developed, it is difficult to envisage how this might serve a growing population, changing shopping habits and the desired additional level of retailing within Bray.

Using GIS modelling it is possible to map the population catchment within a 15-minute walking distance of the site:



**FIGURE 2: 15-MINUTE WALKTIME CATCHMENT**

Based on the Census 2011 Small Area totals and the 2016 preliminary census figures, the catchment population projections from 2012-2016 demonstrate a 4% increase. The population projections from 2016-2019, demonstrate a growth rate of 2% in line with the population targets of Bray as outlined in Table 2.4 of the Wicklow County Development Plan 2016-2022. This reveals a significant population catchment in the immediate vicinity of the site, and a catchment that exceeds the parameters of a 'District Centre' as defined in the *Retail Planning Guidelines* (5,000 to 15,000 persons).

Year	Population	% Increase
2012	15,500	-



2016	16,132	4
2019	16,457	2

FIGURE 3: POPULATION OF CATCHMENT AREA

Our Client supports the strategic vision for retailing presented in the WCDP “that every resident, visitor and worker within County Wicklow shall have access to a range of quality retail goods within County Wicklow, and that these goods shall be provided within town and village centre areas that are vibrant places to be in and viable places to do business”. Retailing services provided by Lidl Ireland GmbH would assist with achieving the key strategic objectives of the development plan, including *inter alia*;

- To expand the level of convenience floorspace to meet the convenience shopping needs of existing and future residents up to 2031; and,
- To enable each centre to perform in accordance with its role and function as identified in the Retail Hierarchy and to allow a healthy level of competition between centres whilst ensuring that the role and function of each centre is not undermined.

The WCDP's Economic Development sets out over arching goals for economic and community development within Co. Wicklow, including *inter alia*:

- Goal 6 - Develop infrastructure and measures that are positive and supportive to investment, enterprise, innovation knowledge creation in strategic locations.
- Goal 7 – Sustain existing enterprise and develop quality employment and income opportunities for the wide range of employment needs in the County, with possibilities for reversing commuting patterns.

The Development Plan promotes sustainable planning principles, and stipulates that the priority location for new jobs growth should be exiting town centres and existing developed lands, such as brownfield sites. A suite of objectives are presented to achieve economic development, including *inter alia*;

- EMP 7 - to encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the County and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.
- EMP 9 – to promote and support the enhancement of the built, natural and social environment to attract and sustain employment creation initiatives.
- EMP 10 – to facilitate the provision of a mix of ancillary services such as a shop or food outlet, creche etc. on large sites zoned for employment at peripheral locations where a detailed justification/need for such facilities has been demonstrated and where it has been demonstrated that the provision of such facilities does not impact on existing facilities, in particular, town centre or local neighbourhood centre activities.

Our Client's current application to WCC as outlined in section 3.1 of this submission would assist with achieving all of the highlighted goals and objectives. The application is supported by a Retail Impact Assessment which clearly demonstrates that there is a need for the supermarket at this location and its provision would not impact on the viability of other retail providers.

The proposed development would ensure critical infrastructure requirements are in place (distributor road and drainage) for the wider A.O. Smith site. It would act as a catalyst for the regeneration and occupation of this brownfield site, making it attractive to prospective businesses and new economic opportunities.

#### 4.2 Bray Municipal District Draft Local Area Plan 2017

The draft LAP proposes a land use zoning objective of 'E: Employment' for the entire 'AO Smith' site with an associated objective “to provide for the development of enterprise and employment”. The description for this zoning designation is “to facilitate the further development and improvement of existing employment areas and

*to facilitate opportunities for the development of new high-quality employment and enterprise developments in a good quality physical environment.*

Typical appropriate uses for employment zoned lands include:

*“general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations and ancillary developments for employment and industry uses in accordance with the WCDP”.*

The proposed zoning removes the ‘opportunity site’ status’ afforded to the site and the option of neighbourhood services/supermarket under the current Development Plan. Our Client, considers that these proposed changes would obstruct the redevelopment of A.O. Smith site. Their current proposal offers the site the first real opportunity of developing to its full potential, offering the local population a quality retail offering while also providing the necessary infrastructure to stimulate other development opportunities. The proposal to remove a critical aspect of the current zoning i.e. the option to provide a supermarket could be detrimental to the realisation of the development of the site.

It is evident that under the current zoning designation the site has failed to achieve the objective *“to provide for economic development and employment”*. The proposed draft LAP zoning does not address this and rather than augmenting the ‘permitted in principle’ landuses, further limits the capacity for this critical brownfield site to achieve its full potential.

The proposed zoning is contrary to the draft LAPs Economic Development and Employment Strategy, which seeks to *“facilitate the provision of key infrastructure required for the future development of enterprise and employment”* (p.14). Our Client’s current proposal is pivotal to the realisation of this strategy in the context of the A.O. Smith site, however, the proposed zoning serves to obstruct this.

Their application clearly demonstrates through an evidence based study, the accompanying Retail Impact Assessment, that the proposed development would not undermine the town’s role as the principal shopping destination. Rather it would support an essential component of the future development of the site as an area of employment generation through improving the roads and services infrastructure and thus would promote the Infrastructure Strategy for Bray MD to *“facilitate and promote the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlement”* (p.19).

In line with the Wicklow County Development Plan, an indicative convenience floorspace of 7,000 sq.m is proposed in the draft LAP and our Client welcomes this allocation. However, it is of concern that within Chapter 11, Zoning and Landuse, retail is restricted to Town and Village Centres as a generally appropriate use and it is omitted from employment zoned land. This is considered to be a critical omission given that areas of employment generate significant demand for retail services and in the context of the A.O. Smith site, it is located within an expansive residential area and it is proposed to generate significant employment potential through its redevelopment.

Boghall Road is identified as a priority employment area and the draft LAP states that *“it is an objective of the Council to support and facilitate the growth of existing employment areas”* (p.26), which includes the subject site. A suite of objectives are proposed including:

- E4 – *“to encourage the redevelopment of brownfield sites for enterprise and employment creation...and to consider allowing relaxation in normal development standards on such sites to promote their redevelopment...”* (p.27)

Our Client, welcomes the inclusion of this proposed objective and is committed to assisting with achieving the development potential of the AO Smith site as an area of employment. Its current proposal provides for the creation of 70No. full time employment positions at the site and the ancillary infrastructure proposed would assist with attracting a potential 13,650 sq.m of employment floorspace.



The current zoning of the site seeks a maximum plot ratio of 1:5 and the Masterplan which accompanies the current application realises a plot ratio of 0.7. During the initial concept design process, consideration was given to the maximum plot ratio of 1.5 and the topography of the AO Smith site and car parking were identified as limiting factors to achieving this. Table 12.4 of the Development Plan sets out the minimum car parking standards for various types of development. A total of 273 car parking spaces are required to accommodate the proposed Masterplan uses i.e. 11No. buildings. Increasing the plot ratio would require a concurrent increase in car parking spaces. Developing the entire AO Smith site for office/industry uses with a plot ratio of 1.5 would necessitate the provision of c.920 car parking spaces to meet the minimum car parking standards set out in the Development Plan. This would necessitate either the inclusion of a multi-storey carpark and/or under-ground parking in individual units. It is considered that the associated costs could significantly impact on the viability of development at the AO Smith and would pose a significant threat to its future development potential. Therefore, the proposed relaxation in development standards is welcomed and considered to be a positive advancement toward the regeneration of this site.

Chapter 8 of the draft LAP sets out the proposed infrastructure strategy and a key goal is *“to facilitate the improvement of the existing road network, to remove bottlenecks and increase free flow”* (p.44). The current application is accompanied by a Transport Assessment and demonstrates that the proposed development would address the existing queuing and delays at the Boghall Road/Killarney Road junction, through the provision of the distributor road and 139No. carparking spaces, with unrestricted short-term access, will assist with significantly improving the identified delays at peak school times.

Key Development Areas (KDA) are identified in Chapter 10 of the draft LAP. From our Client’s perspective, it is regrettable that the A.O. Smith site is not identified as a KDA. The objective for the identified sites is that they are *“to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for sustainable, phased and managed development...”* (p.55). It is our Client’s considered opinion that this is exactly what they are proposing for the A.O. Smith site in their current application. Due consideration has been given to the wider landholding through the preparation of a Masterplan for the site. The scheme has considered the wider transportation issues surrounding the site and proposed remedies to address this. The proposed development of the supermarket, distributor road and drainage infrastructure would fulfil the aspirations for the phased and managed development of the overall site and would serve to ‘kick start’ development in a similar manner proposed for the Former Dell Site identified which is identified as a KDA within the draft LAP.

The A.O. Smith site is considered to be a significant development site that could add substantially to employment creation in the town and it is critical that any forthcoming Local Area Plan would promote this and not detract from its potential.

## 5. Request

In order to positively contribute to the realisation of identified development objectives within the Wicklow County Development Plan and specifically for Bray, we request that retail be included as a ‘permitted in principle’ use on lands zoned for employment and specifically at the A.O. Smith. The option of a supermarket at this site is critical to realising its development potential and should be reinstated in the forthcoming Bray Municipal District Local Area Plan.

This would facilitate the timely delivery of development of this brownfield site and a more immediate sustainable use, providing employment (direct and indirect) and will significantly increase the marketability of the site and the potential to reinvigorate the entire site.

We believe that Lidl Ireland GmbH’s current application for permission provides significant rationale for the proposed development, which will not impact on the viability of the town centre. Considering this context and the expansive growing residential catchment, from a planning perspective there would appear strong reasoning supporting the principle of providing an objective for retail development at the A.O. Smith site.





The previous Bray Local Area Plan 2011-2017 identified the subject site, the AO Smith site, as an opportunity site for Employment Uses, EMP1, with the potential for a range of development;

*“Predominantly employment use development. Industry/office/ and science and technology based uses in the main with the option of neighbourhood services /discount foodstore. The site is considered suitable for the location of taller buildings up to 5 storeys in height. Max Plot Ratio 1.5”.*

Other than our client, the site has had no further interest in developing the site to its potential. The site remains a Brownfield Site. Given that the previous LAP promoted the development of taller buildings and a range of permissible development types on the subject site, it is unclear as to why the site was omitted from the list of identified opportunity sites by the Council.

We submit that this request should be considered in the context of the previous zonings, the specific local objective relating to this ‘Opportunity Site’ (7) and the subsequent lack of activity to redevelop the site, other than the proposed supermarket development.

Lidl Ireland GmbH have given a clear expression of interest in developing a supermarket specifically on this site in line with the current planning objectives for the site. In addition to the site’s adjacency to the zoned neighbourhood centre, the site’s location and scale has clear operational advantages in being able to absorb a mix of development uses while not impacting on the function of the historic centre of the town or neighbouring centres. By allowing for a mix of uses on the site there are clear advantages for the development of the site as a whole.

It is clear from the evidence presented above that development of the site to date has failed. With the exception of the ‘supermarket option’, there has been no interest shown in realising its development potential. We wish to highlight that there are extensive employment-generating lands located within the neighbouring vicinity (e.g. Boghall Road, Killamey Business Park), along the Southern Cross route and as such the employment-generating potential of the area will not be materially affected by the inclusion of an option for a supermarket at the subject site.

The inclusion of a retail option would, in our opinion, provide a robust platform for the realisation of the employment potential of the A.O. Smith and the greatest avenue towards sustainable and efficient use of these inner-urban lands.

There is a clear need for additional convenience retail floor space and other alternative uses required in this area of Bray to serve both the existing and projected local population and future employment population. The site is over 1.6km from the town centre and therefore not within easy walking distance for many locals within the defined catchment. A retail development would address the significant expenditure leakage currently occurring as evidenced in the Retail Impact Assessment which accompanies the current application for permission.

The A.O. Smith site retains the key locational characteristics which made it worthy of an ‘Opportunity Site’ designation in 2011. The zoning provisions of the new Municipal District Development Plan for Bray needs to reinforce the potential of the site to become a landmark mixed-use development serving both employment and local needs.

## 6. Conclusion

In summary, we propose that retail should be applied to the subject lands as a specific objective and thus a use that is generally appropriate. Given its significant potential for development, consideration should be given to identifying the site as a Key Development Area.

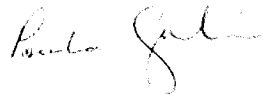
Supporting a supermarket development on this site would act as a catalyst for the development of the remainder of the site and would significantly improve the marketability of the site in terms of attracting employment-end users.





Please do not hesitate to contact the undersigned if you have any queries.

Is mise, le meas,



Paula Galvin

**McCutcheon Halley Chartered Planning Consultants**



## Appendix 1.





Administrative Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Whitegates,  
Wicklow Town,  
County Wicklow

11<sup>th</sup> November 2016

**Re: Invite for Submissions regarding the Preparation of a new Local Area Plan for the Bray Municipal District area.**

Dear Sir/Madam,

McCUTCHEON HALLEY Planning Consultants wish to avail of the opportunity to make a submission on behalf of Lidl Ireland GmbH with respect to the preparation of the new Local Area Plan for the Bray Municipal District. We note the contents of the 'Public Consultation Booklet' produced by Wicklow County Council raising various issues for consideration as part of the consultation process. We note that the Consultation document provides extensive attention regarding future housing provision, and we consider it vital that in preparing the new Local Area Plan extensive consideration is given to retail services that will support new housing, as 'retail' is part of successful place-making.

We are also aware that the *Wicklow County Development Plan 2016-2022* has recently been adopted by the County Council and that this sets out clear strategic direction for Bray, prioritising its development including for retail purposes. This submission has been framed in the context of the issues raised within the aforementioned booklet, the prevailing economic outlook, legislative change and our Client's vital and growing role in the national and local economy.

Our submission aims to highlight the need for greater flexibility in terms of land-use zoning objectives for the Bray Municipal District. Overly prescriptive land-use zoning objectives and restrictive objectives have the potential to stifle future development potential and as such, there needs to be greater opportunity for the location and scale of supermarkets in the Local Area Plan area, and more than that currently provided for under the current *Bray Town Development Plan 2011-2017*.

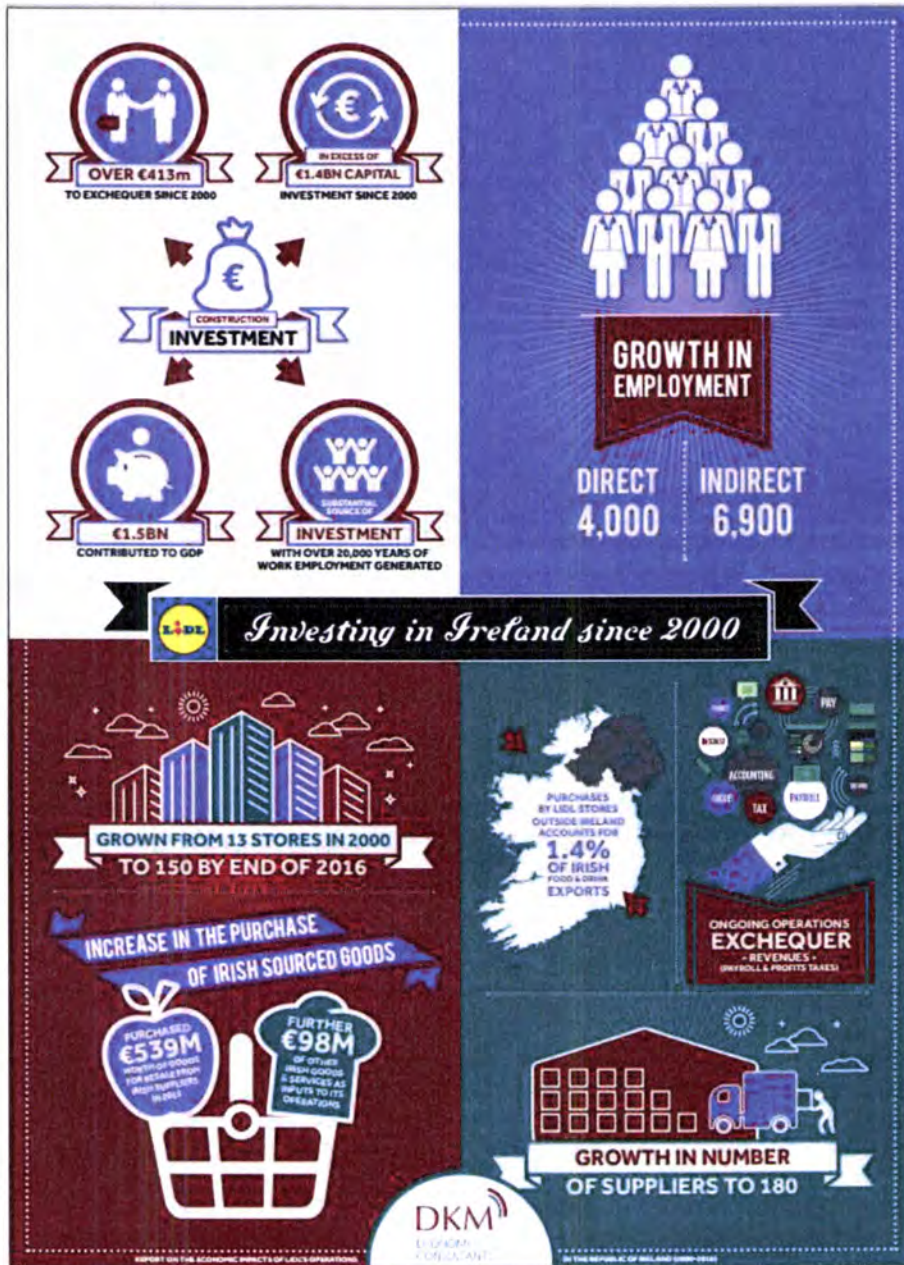
Retailing services provided by Lidl Ireland GmbH are a key contributor to the vitality and viability of centres in Wicklow, making a major contribution to the urban structure, serving as a major employer and operating as an economic driver.

Lidl established its first seven Irish stores in 2000, and now operates over 150 throughout the country. Lidl has invested €1.4 billion in the Republic of Ireland with an additional €110 million capital spend earmarked for 2016. This capital investment in turn has contributed €1.5bn to Irish GDP since 2000.

www.mhplanning.ie

DKM<sup>1</sup> estimates that the Exchequer has gained revenues of €413 million from Lidl's capital investment programme in the Irish economy since 2000 in addition to revenues derived from its ongoing operations. Lidl's activities are widely spread around the country, much of it in smaller towns where alternative employment opportunities can be limited, especially in recent years.

Lidl employs 4,000 staff directly in Ireland and supports the employment of an additional 6,900 in suppliers and the wider economy through its ongoing operations in Ireland and overseas. In the context of employment, Jobs offered by Lidl are of a high quality, providing sector leading rates, supported by training and education and opportunities for career progression. When employment generated from its capital investment programme is added, total direct and indirect employment supports 11,000 jobs in Ireland. Results of the DKM report are summarised in the infographics below.



<sup>1</sup> DKM Economic Consultants – *The Economic Impacts of Lidl's Operations in the Republic of Ireland (April 2016)*



We consider that there is a greater necessity for the following to be applied within the new Municipal District Local Area Plan: -

**Need for Additional provision of 'Neighbourhood Centre' and 'Town Centre' Zoned Land within the Plan Boundaries**

The present provision of neighbourhood centre and town centre zoned lands, both existing and proposed within the Environs Plan and the Town Plan, does not provide sufficient scope for allowing retail development, including supermarkets, particularly when considering the existing and future population. Ambitious projections relating to increased housing and population increases need to be met with a commensurate increase in service areas, including those specifically aimed at accommodating retail services. Failure to provide sufficient areas to accommodate the increased retail floorspace requirements of the town will only lead to significant retail leakage out of the town to more distant centres, which can have major knock-on environmental and economic ramifications (e.g. unnecessary car trips and dislocation of jobs). The Council should consider additional new greenfield or brownfield sites for rezoning as 'Town Centre' or 'Neighbourhood Centre' sites, particularly where there has been minimal interest in utilisation of these sites for alternative purposes. It may also be worth considering extension of existing neighbourhood and town centre zonings to accommodate the increased requirement for such lands.

A high-level analysis of the overall extent of retail floorspace in Bray relative to the catchment population suggests that existing stores, particularly convenience stores, are over-trading and there is an anticipated significant loss of retail expenditure in the town to more distant centres, particularly towards the south Dublin area. The critical mass of retailing on various levels (high to low / comparison, convenience, bulky) does not exist at present in Bray and it is difficult to envisage the present situation changing without greater opportunity for retailers to use a wider expanse of LAP lands. The Council should also take a proactive approach to site identification and assembly to support the sustaining of retail in key locations.

**Need for 'supermarkets' to be 'Permissible in Principle' in a wider range Land Use Zoning Objectives**

The following table sets out the land-use zones where some element of 'retail' is either 'permissible in principle' or 'open for consideration' based on the land-use zoning objectives contained within the current *Bray Town Development Plan 2011-2017*: -

Zoning Objective	Permissible Uses	Open for Consideration
"RE1" Primarily Residential Zone	-	Local Convenience / Neighbourhood Shops
"RE2" Primarily Residential Zone	Local Convenience/Neighbourhood Shops	-
"TC" Primarily Town Centre Uses Zone	Shops-Major Shops - Neighbourhood	Discount Foodstore
"SF" Primarily Seafront Uses Zone	Shops	-
"NS" Local Neighbourhood Centre	Discount Foodstore Shops - Neighbourhood	Shops - Major
"NS1" Local Neighbourhood Centre Zone	Discount Foodstore Large - Foodstore Shops - Neighbourhood	-
"GTH" Town Gateway and Transportation Hub Uses Zone	Shops- Major Shops - Neighbourhood	Discount Foodstore

The store formats operated by Lidl can only currently be considered 'permissible in principle' on town centre, neighbourhood centre and Town Gateway and Transportation Hub zoned-lands (or where a specific local objective applies e.g. A.O. Smith site). Based on the wording of the *Town Development Plan*, and as discussed further below, a supermarket is 'not permitted' on all other lands, including residential lands (RE1 & RE2) and Seafront (SF) lands, Employment (EMP1 & EMP2) lands, Film Industry (FI) lands, Civic, Community &

Education (CE) lands, Open Space (OS1-4) and Mixed-Use (MU1-6) lands (unless a specific local objective provides for same).

When considering the approach taken by other Council's this appears a very restrictive policy approach to this type of development. Within the *Fingal County Development Plan 2011-2017* and the *Draft Fingal County Development Plan 2017-2023*, Fingal County Council takes a more progressive approach in this regard, providing greater flexibility and less restrictions in principle. The table below lists the current zones in the Fingal area that allow for supermarket developments and the extent of floorspace potentially achievable.

<b>"LC" Local Centre</b>	Retail – Supermarket ≤ 2,500 sqm nfa
<b>"MC" Major Town Centre</b>	Retail – Supermarket ≤ 2,500 sqm nfa Retail – Superstore > 2,500 sqm nfa Retail – Hypermarket > 5,000 sqm nfa
<b>"ME" Metro Economic Corridor</b>	Retail – Supermarket ≤ 2,500 sqm nfa
<b>"RA" Residential Area</b>	Retail – Supermarket ≤ 2,500 sqm nfa
<b>"RV" Rural Village</b>	Retail – Supermarket ≤ 2,500 sqm nfa
<b>"TC" Town and District Centre</b>	Retail – Supermarket ≤ 2,500 sqm nfa

Fingal County Council allow for the principle of supermarkets on residential-zoned lands. Clearly the above zoning objectives do not simply 'pave the way' for a 'supermarket' development; there are extensive environmental factors that need to be taken on board, but in simple terms this zoning approach by Fingal County Council does not preclude large swathes of lands from retail development.

We see significant scope for permitting in principle supermarkets on a range of zoned lands. The physical, service and land requirements for a supermarket can be found on employment lands. Level, expansive ground generally associated with employment lands makes it much more viable and achievable to accommodate the level floor plates required for supermarkets.

In summary, we request that Wicklow County Council take a more open view regarding the principle of accommodating supermarkets on the Local Area Plan lands, including residential, mixed-use and employment lands.

### **Need for 'supermarkets' to be 'Open for Consideration' in a wider range Land Use Zoning Objectives**

Section 13.1 of the current *Bray Town Development Plan 2011-2017* clarifies the following: -

*"Land uses designated under each zoning objective (including zones within Action Areas) as 'Not Normally Permitted but Open for Consideration' are not normally acceptable. However, uses may be permitted where the planning authority is satisfied that the use would be compatible with the overall policies and objectives for the zone, it would not have undesirable effects, and it would otherwise be consistent with the proper planning and sustainable development of the area"* (p. 139) (Author emphasis added).

By stating that such 'open for consideration' uses are 'not normally acceptable', this almost fully precludes all other uses, with the exception of those uses 'permitted in principle'. This is further compounded by the fact that the Town Plan states that "*[I]and uses which are not indicated as 'Permitted in Principle' or 'Not Normally Permitted but Open for Consideration' will not be permitted*" (p. 139) (Author emphasis added). We suggest a more modest approach should be taken in this regard and we refer to the current wording used in the recently adopted *Dublin City Development Plan 2016-2022*.

*An **Open for Consideration Use** is one which may be permitted where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on the permitted*



uses, and would otherwise be consistent with the proper planning and sustainable development of the area.

We note that the *Wexford County Development Plan 2009-2015* allows for convenience to be 'permitted in principle' on 'Town Centre', 'Core Retail Strategy' and 'Neighbourhood Centre' lands, but that such uses including supermarket-scale developments are also 'open for consideration' on 'Residential & Infill', 'Community & Educational', 'Commercial & Mixed Uses' and 'Mixed Uses & Residential' zoned lands. In our professional planning opinion a similar and more open approach would create greater opportunity to develop the retail requirements and urban structure of Bray, mindful of future projections.

Furthermore, the inclusion of the term 'discount foodstore' in the current Town Development Plan, including in reference to 'Permitted in Principle' and 'Not Normally Permitted but Open for Consideration' land use categories, should be replaced with 'supermarket' to reflect the provisions of the updated *Retail Planning Guidelines 2012*.

### **Removal of Prescriptive floor area caps**

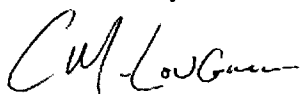
It is our view that the existing use of caps on convenience 'discount' foodstores as outlined in the current *Bray Town Development Plan 2011-2017* (p. 48) should not be continued into the new Local Area Plan. In our opinion the application of these objectives is contrary to the *Retail Planning Guidelines* which have been updated since the insertion of these 'capping' objectives in the current Town Plan. In this regard, there is no specific policy within the *Retail Planning Guidelines* to support the implementation of a floorspace cap. If this is to continue, a similar more open approach to that undertaken by Fingal County Council should be followed (as highlighted in the table above).

Implementation of caps on net (or gross) retail floorspace restricts the potential for key centres to provide their catchment with convenience retail offering on a par with neighbouring centres both within and outside the Local Area Plan catchment. Consequently, this encourages a person to travel longer distances outside their area for larger convenience shopping trips, in turn leading to unsustainable travel patterns and traffic congestion. The Council should consider lifting the cap, mindful of the ambitious anticipated need for additional floorspace for Bray, as outlined in the *Wicklow County Development Plan 2016-2022*. In short, application of such caps can inherently fail to understand the true dynamics of an area, which would be better understood in the form of area specific Retail Assessments.

In conclusion, having regard to the important role foodstores and supermarkets perform, it is vital that the new Local Area Plan should provide greater flexibility for the locations and scale of such facilities in the Plan boundaries. From the outset the Council is respectfully requested to consider the importance of ensuring the opportunities for providing retailing within the Plan boundaries is consistent with the projections relating to housing and population. A lack of flexibility in this regard is likely to stifle the potential to provide for retailing to match increased expenditure in the area. There needs to be greater opportunity for the location and scale of supermarkets in the Local Area Plan area, considerably more than that currently provided for under the current *Bray Town Development Plan 2011-2017*.

We trust that the above requests will be taken into account as part of the preparation of the Bray Municipal District Local Area Plan 2017-2023. Our Client welcomes the opportunity to engage with the Planning Authority in these matters and trust that due consideration will be taken of this submission. Should you have any queries please do not hesitate to contact the undersigned.

Yours sincerely,



Colm McLoughlin MIPI MRTPI CAPM

**McCutcheon Halley**

**Leonora Earls**

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**From:** Alison Lynch  
**Sent:** 04 September 2017 21:11  
**To:** Planning - Plan Review  
**Subject:** Proposed housing development

Dear sir/madam

I wish to object to the proposed housing behind Deepdales on the Southern Cross Road. I feel it would negatively affect us as residents. We do not have the infrastructure or public transport to support development of this kind.

The land above Deepdales needs to be re-instated as a green belt as a matter of urgency .

Regards

Alison Lynch

Sent from my iPhone



**Leonora Earls**

---

**From:** Frank Lynch [mailto:franklynch@greatplacetowork.ie]  
**Sent:** 04 September 2017 21:35  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jeyan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC  
**Subject:** Planning objection

Dear Sir/madam

I wish to strongly object to the proposed development behind deep sales on the southern cross road.

We do not have adequate public transport as it is and it would worsen an already bad traffic situation.

We as residents already have noise from the industrial estate daily and any further development would negatively impact this.

I want the green belt to be re-instated onto the LAP as a matter of urgency.

Regards

Frank Lynch

Sent from my iPhone

**Leonora Earls**

**From:** rosemary lynch [mailto:rosemary.lynch@wicl.gov.ie]  
**Sent:** 05 September 2017 13:46  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Irene Winters MCC; Cllr. Sylvester Bourke MCC; Cllr. Pat Fitzgerald MCC; Cllr. Pat Kennedy; Cllr. Mary McDonald; Cllr. Miriam Murphy; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Gerry O'Neill; Cllr. Jim Ruttle MCC; Cllr. Edward Timmins MCC  
**Subject:** Objection to the Bray Municipal Plan Southern Cross / Kilruddery

Dear Administrative Officer of the Wicklow Planning Section

I have read the plan and its particular details for the Little Sugarloaf and Kilruddery areas behind Hollybrook Park where I live ( No 148).I submit this objection to the Wicklow Planning Section.

I object to the following three proposals in the plan.

- a)to rezone part of the Kilruddery Estate from Green Belt to Tourism and Conservation zoning b)to zone previously un- zoned land on the lower fields of the Little Sugarloaf for 240 housing units
- c) to zone land for industrial purposes adjacent to the existing industrial estate

Living in Bray for the 19 years I am totally aware of the need to develop housing, tourism and real jobs in Bray. I support the provision of new housing in Bray. I am keenly supportive of sustainable , sensitive development of tourism for Bray . Furthermore I support Bray's need to provide sustainable job creation. But not on the lowlands of the Little Sugarloaf as proposed in the plan.

I object to the proposals listed above for the following reasons.

Firstly I think a short walk around the Southern Cross estates and on and around the land of Kilruddery will self explain how tourism and conservation could be ruined by the proposals ever seeing the light of day . The Small Sugar Loaf is an exceptional and beautiful tourism resource that we should jealously guard. More importantly the natural bio-diversity and ecology of these lands scream to be conserved free of development as proposed!

Secondly I object on the grounds of the sure creation of a flooding hazard if this plan goes ahead as proposed above.Flooding is already a problem as the waters from the Little Sugar Loaf directly flow down to Hollybrook Park in torrents. My garden floods regularly in heavy rain and the land is saturated often. More housing and industrial development would create dangers to an already fragile situation and potential flooding disaster in time.

Thirdly I further object to the proposals on grounds of the lack of existing infrastructure for the residents of the Southern Cross without these plans even coming to fruition. As a resident of Hollybrook Park for 19 years I can vouch for this. Not even a shop to buy the small necessities is within easy walking distance for the many residents . We have a more than scanty bus service during the week and none at weekends,.Traffic is already a nightmare on the Southern Cross. Even just accessing the Southern Cross by car from my estate proves difficult and is time wasteful. The proposals in the Bray Area Plan outlined above would exacerbate already abysmal traffic conditions . Development as proposed would put our estate under further pressure for parking . Litter is a growing problem. I actually applied to the council for litter pickers ( recently received) to gather litter often strewing the public paths from Hollybrook to

Kilruddery. I was so incensed Added development with the existing poor infrastructure could only increase the litter problem.

Fourthly I strongly object to the proposal to create a walkway through Hollybrook Park. We already are dealing with the consequences of youths drinking and loitering in the woods . The idea of creating a thoroughfare further increasing these problems. with possiblity of further vandalism is unthinkable. No thanks!

I am so grateful to Joe Behan for having alerted the residents to these proposals . I wonder how we would have been informed otherwise. I am also very grateful to the coucillors who attended the Southern Cross Residents residents meeting in The Royal Hotel to discuss the plan and to Simon Harris and John Brady contributions also.

I urge this objection be forwarded to Wicklow County Council for consideration . I urge all coucillors to support my objections raised and to stop the proposed plans to the Kilruddery / Southern Cross areas .

Yours sincerely

Rosemary Lynch 148 Hollybrook Park Bray Co Wicklow

**Leonora Earls**

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**From:** rosaria macari  
**Sent:** 07 September 2017 12:12  
**To:** Planning - Plan Review  
**Subject:** Concern/Objection to development at rear of Charnwood Bray



Re: Area at the back of Charnwood estate, Bray, earmarked for potential zoning for residential use.

Dear Wicklow Council,

I would like to raise concerns and object to the development of this area for the following reasons.

Assumption: That the access to this development would be through Charnwood estate. Some points below are also valid should access be through other areas other than Charnwood.

1. The Charnwood estate is a Cul De Sac. We purchased our house based on this and development of a further estate would mean that Charnwood would no longer be cul de sac and our house would lose value.
2. Increased traffic in Charnwood estate where children play - there is already very little space in the estate for children to play. By removing the cul de sac and increasing houses, traffic would increase reducing safety for playing children. The estate is already very built up and tight on space.
3. Increased traffic at junction to Vevay Rd - this is already a busy junction. Traffic would further have to spill into Bray town which is already a traffic disaster or go to Bray South roundabout to join N11.
4. Mature Trees - There are mature trees in the field which should not be cut down. Apart from the very important environmental and health reasons, the trees perform important drainage in the estate which would otherwise be a swamp.
5. We have difficulty getting house insurance as some insurance companies won't insure houses within 200m of a water source. Any new housing would have even more problems getting home insurance.
6. Flooding risk increase. Any new development would be a) lower than back row of Charnwood and have higher risk of flooding, b) higher than back row of Charnwood flooding the back row of Charnwood or c) at same height as back row of Charnwood increasing flood risk to the whole estate.

There is much more land from the roundabout at the southern cross towards greystones and towards the bray south roudabout at Hills garage, both with much better access to the N11. Also west of the N11 there are numerous fields. It makes more sense to develop land further south/west, rather than pile more houses on top of already busy estates.

Kind Regards  
Rosaria Macari  
Resident at Charnwood Estate

**Leonora Earls**

---

**From:** Richard Butler  
**Sent:** 15 September 2017 13:56  
**To:** Planning - Plan Review  
**Cc:** John Maguire; Eamonn Prenter  
**Subject:** Submission on the Bray MD Draft Local Area Plan  
**Attachments:** John & Margaret Maguire Submission on Draft Bray MD LAP September 2017.pdf

Dear Sir/Madam,

Please find attached a submission on the Bray MD Draft LAP on behalf of John and Margaret Maguire.

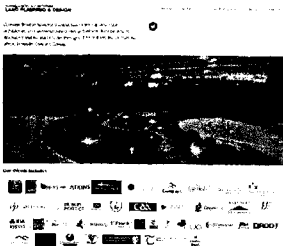
Please confirm receipt of the email and attachment.

Kind regards,

**Richard Butler** MIPI MILI  
Associate Director – Town Planner & Landscape Architect

**CUNNANE STRATTON REYNOLDS**  
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3 Molesworth Place, Dublin 2



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CUNNANE STRATTON REYNOLDS

CSR Ref: 16473/RB/150917

Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town

By Email:

15 September 2017

Dear Sir/Madam,

## **SUBMISSION ON THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN**

**From: Cunnane Stratton Reynolds on behalf of John and Margaret Maguire**

I write on behalf of our clients John and Margaret Maguire in response to your request for submissions on the draft Bray Municipal District Local Area Plan (hereafter referred to as the Draft LAP). Our clients are grateful for the opportunity to comment on the Draft LAP and trust that you will take their submission into consideration.

The submission addresses the following issues:

- Error on Map No. G11 Green Infrastructure.
- Statement of Wicklow County Council's willingness to intervene to facilitate infill development.
- Amendment of the description of the RE Zoning Objective.
- Identification of opportunity sites for residential infill.

We discuss these issues individually below.

### **1.0 Error on Map No. G11 Green Infrastructure**

Our clients are the owners of a vacant property of 2,188 sqm located between Sidmonton Court and Sidmonton Park, Bray (see Figure 1 overleaf).

In accordance with its long-standing residential zoning our clients have made several applications for planning permission for residential development on the site in the last number of years. The most recent application, for a development of four houses (Reg. Ref. 15/462, ABP Ref. PL.27.245191), was granted permission by An Bord Pleanála. This decision by the Board is currently the subject of a judicial review.

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Figure 1 Property (red outline) owned by John and Margaret Maguire



On Map No. 2 Land Use Zoning Map of the Draft LAP the site is shown zoned 'RE Existing Residential' (see Figure 2 below). This is similar to the zoning objective of the current Bray Town Development Plan 2011-2017, in which the site is zoned 'RE1 Primarily Residential Uses' on Map No. 7.

However, on Map No. GI1 Green Infrastructure of the Draft LAP the site is coloured green indicating that it is an area of 'Open Space and Parks' (see Figure 3 below).

Figure 2 Extract of Map No. 2 of the Draft LAP

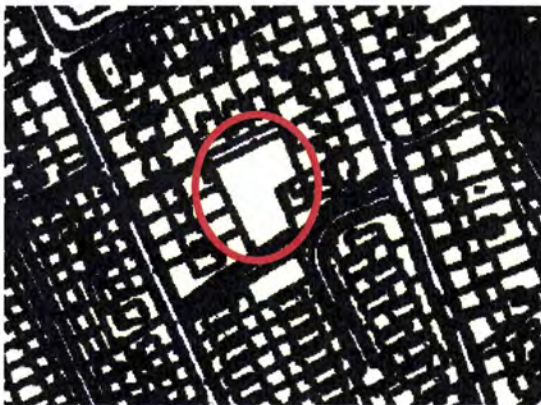
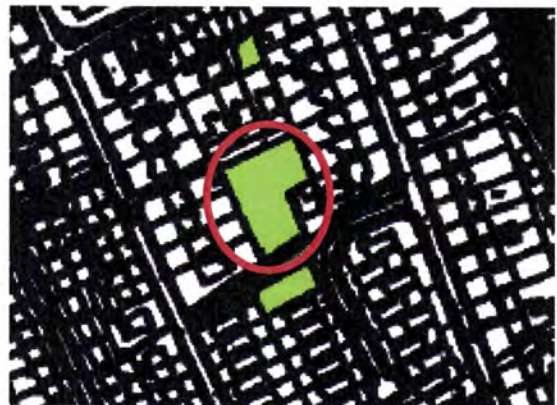


Figure 3 Extract of Map No. GI1 of the Draft LAP



We believe that the property has been identified as an area of 'Open Space and Parks' on Map GI1 of the Draft LAP in error.

The property is not an area of open space; it is a private property not accessible to the public, and it serves no recreation or amenity function. The property is a vacant infill residential development site, as indicated by (a) its 'RE' zoning on Map No. 2 of the Draft LAP, (b) its RE1 zoning on the Land Use Zoning Map No. 7 of the Bray Town Development Plan 2011-2017, and (c) by the previous decisions by Wicklow County Council and An Bord Pleanála which recognise the suitability of the site for residential development/use.



We are concerned that by showing the site as 'Open Space and Parks' on Map GI1 of the Draft LAP, some confusion or ambiguity about the site's zoning objective and future use might arise. We are also concerned that any future proposals for residential development of the site (if required, depending on the outcome of the ongoing judicial review), may be perceived as being in conflict with Green Infrastructure or open space policy of the Draft/future LAP.

Accordingly, we request that Map No. GI1 be amended to exclude our clients' property from the areas identified as 'Open Space and Parks'.

## **2.0 Statement of Wicklow County Council's willingness to intervene to facilitate infill development**

The objective of consolidation of the Dublin metropolitan area (which includes Bray), through mechanisms including the reuse of underutilised and/or brownfield sites and the facilitation of infill development, is supported by planning policy at national, regional and local level.

Another key national policy document in this regard is the *Sustainable Residential Development in Urban Areas Guidelines 2009*. In Section 5.9(i) of the Guidelines, regarding infill residential development, it is stated:

*"Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands."*

We request that in accordance with the *Sustainable Residential Development in Urban Areas Guidelines 2009*, the Draft LAP be amended to include a statement that Wicklow County Council will intervene where necessary to facilitate access for infill and backland development.

We suggest that such a statement could be added to Objective R4 of the Draft LAP, as follows (the black text is as exists in the Draft LAP; the red text is the proposed addition):

"To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish. The Planning Authority will intervene where necessary to overcome barriers to appropriate infill housing development, including by facilitating the provision of access to infill and backland sites."

## **3.0 Amendment of Description of the RE Zoning Objective**

Infill and backland sites are often constrained by real and perceived 'barriers' to development, particularly with regard to provision of access to sites.

Such a barrier has been used to block development of our clients' property on past planning applications (specifically, the requirement to access the site by providing an access lane crossing a green verge area and public footpath which form part of the existing Sidmonton Court public open space). This experience is not unusual with regard to infill sites.

Given this history, and the statement in the *Sustainable Residential Development in Urban Areas Guidelines 2009* that 'Local Authority intervention may be needed to facilitate infill development, in particular with regard to the provision of access to backlands', we suggest that the description of the RE zoning objective in the Draft LAP be amended to help to overcome unnecessary barriers to appropriate development.

We suggest that the wording of the description of the RE zoning be changed in the table in Chapter 11 of the Draft LAP, as follows (the black text is as exists in the Draft LAP; the red text are the proposed changes):

ZONING	OBJECTIVE	DESCRIPTION
<b>RE: Existing Residential</b>	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions, and to facilitate appropriate infill residential development, in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing dwellings or other non-community related uses that significantly impact on such open space areas will not normally be permitted.

These minor changes would allow for the Council to apply a greater degree of discretion in determining applications where some residential-related development (as opposed to housing or dwellings per se) is required in open space areas to facilitate appropriate infill in RE zoned areas.

#### **4.0 Identification of Opportunity Sites for Residential Infill**

We welcome the inclusion of objective R4 in the Residential Development Strategy for Bray MD in the Draft LAP (although we recommend an addition to objective R4 in Section 2.0 above):

*"To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites..."*

We welcome the following statement regarding the phasing of development, on p.73 of the Draft LAP:

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

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided;*
- *A strong emphasis should be placed on encouraging infill opportunities and better use of underutilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.*

*Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal."*

These draft policies recognise the importance of, and support, the development of infill sites in accordance with the principles of sustainability and sequential development. Furthermore, they are in accordance with national, regional and county planning policy (which we identified in our submission on behalf of John and Margaret Maguire at the pre-draft/issues paper stage of preparation of the Bray LAP; our pre-draft submission is enclosed as Appendix A).

We note that in Section 5.5 of the Draft LAP, a number of 'opportunity sites' are identified. These are sites which if developed, 'would contribute to the enhancement of the public realm, vibrancy and vitality, and the retail / services offer in the town centre'.

We submit that meeting housing demand and targets is of at least equal importance to objectives of public realm enhancement, vibrancy and vitality, improvement of the retail/services offer.

The potential housing yield of lands zoned for residential development in Bray and Environs is set out in Table 3.1 of the Draft LAP. In this table, 200 no. units is identified as the potential yield from the category 'Infill on other TC / RE lands'. 200 is the fourth largest yield figure in the table, after the areas of Fassaroe, the Former Bray Golf Club and Kilruddery, which can be considered strategic residential sites/areas.

We submit that given the potential housing yield of the collective infill lands, their development should be further encouraged and given some certainty by identifying key residential infill opportunity sites. This is supported by the following considerations:

- a) the high potential yield of the 'infill lands';
- b) the importance of development of these lands for meeting the housing targets for Bray, Co. Wicklow and the Dublin Metropolitan Area;
- c) the principles of sustainability and sequential development that seek to ensure that lands well served by existing services and infrastructure including public transport are developed first, and
- d) the developability of these lands owing to the relative lack of constraints, and the lack of enabling works and infrastructure required.

We therefore request that the Draft LAP be amended to identify infill residential opportunity sites in Bray, and that our clients' site between Sidmonton Court and Sidmonton Park be included as such an infill residential opportunity site.

There are no significant barriers to development of the site. It is an area of unused land in the heart of an established residential neighbourhood central to the town of Bray and within the Dublin metropolitan area. It benefits from excellent existing services and infrastructure including public transport, with bus stops and the DART station 5-10 minutes' walk away. In its current condition and use it represents an unacceptable and unsustainable waste of valuable resources.

The identification of infill residential opportunity sites including our clients' site in the Draft LAP would constitute effective forward planning, enabling the realisation of the Draft LAP's (and the national, regional and county plans') policies on urban consolidation through infill.

As well as furthering the realisation of national, regional, county and emerging local planning policy, this change to the Draft LAP would be in accordance with the Department of Environment, Community and Local Government's *Planning Policy Statement 2015*. Among the Key Principles of the Planning Policy Statement are the following:

1. *Planning must be plan-led and evidence based...*
2. *Planning must proactively drive and support sustainable development...*
3. *Planning is about creating communities and further developing existing communities in a sustainable manner...*
5. *Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people in support of active and healthy lifestyles by focusing development, whenever possible, at locations with more sustainable travel options...*
6. *Planning will encourage the most efficient and effective use of previously developed (brownfield) land over the use of greenfield land to ensure the most efficient use of existing infrastructure.*

We thank you for the opportunity to contribute to the preparation of the Bray Municipal District Local Area Plan 2017 and trust that this submission will be given due consideration by Wicklow County Council in the finalisation of the document.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Butler', with a horizontal line underneath.

**Richard Butler** MIPI MILI  
CUNNANE STRATTON REYNOLDS  
3 Molesworth Place, Dublin 2

**Appendix A Copy of Cunnane Stratton Reynolds submission on the Bray Municipal District Local Area Plan Public Consultation Booklet (Issues Paper), submitted 10<sup>th</sup> November 2016**

CUNNANE STRATTON REYNOLDS

CSR Ref: EF/16473

10<sup>th</sup> November 2016

Administrative Officer  
Planning Department  
Wicklow County Council  
Whitegates  
Wicklow Town

BY EMAIL ONLY

Dear Sir/Madam,

## SUBMISSION ON THE BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN PUBLIC CONSULTATION BOOKLET (ISSUES PAPER)

I write on behalf of our client John and Margaret Maguire, in response to your request for submissions as part of the preparation of a Local Area Plan for the Bray Municipal District. We welcome the invitation to help shape the future development of this Municipal District. In particular we welcome the opportunity to input into the emerging housing strategy for the Bray Municipal District, which shall determine how this area shall meet current and future housing demand in the context of an increasing housing crisis nationally and particularly within the Greater Dublin Area (GDA).

We have reviewed and considered the Bray Municipal District Local Area Plan 2017 – 2023 Public Consultation Booklet (the Issues Paper).

### Background:

The Bray Municipal District Local Area Plan (hereafter referred to as the emerging LAP), shall be prepared within the context of the current statutory planning policy at the national, regional and county level, and government policy.

### National Guidance:

The emerging LAP must be prepared in accordance with the Local Area Plan Guidelines for Planning Authorities (DoECLG, 2013), the Sustainable Development in Urban Areas Guidelines (DoECLG, 2012), the National Spatial Strategy, and in the context of the Government's plans and emerging legislation to address the housing crisis.

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The Local Area Plans Guidelines require that LAPs play a key role in achieving the objectives contained in higher level plans and strategies, including the NSS, Regional Planning Guidelines, County Development Plan and Government Policy. The core strategy of LAPs must reflect these higher level strategies and ministerial guidance, and be consistent with the Core Strategy of the County Development Plan. The key purpose of LAPs is to implement these higher level plans and strategies at the local level to meet the needs of the area and local communities in a manner that is consistent with best practice in sustainability and the proper planning and sustainable development of Bray town and environs.

LAPs are the primary tool for development management within their local area. Development management controls, such as densities and open space standards, are shaped at a national level by the Sustainable Residential Development in Urban Area Guidelines and other policy guidance notes. The issues of densities and maximising the development potential is particularly important in Bray in light of the perceived difficulty in meeting housing targets and in the interest of promoting sustainable development. Therefore consideration of these guidelines will be essential in the formulation of appropriate policies and standards for housing development.

National planning policy is currently guided by the National Spatial Strategy (NSS) 2002 - 2020, in which Bray is identified as a town within the metropolitan hinterland of Dublin. It is widely recognised that the NSS is outdated, and the Government have announced an intention to review and replace the NSS with a new National Planning Framework. This process is likely to take a number of years, and in the interim the Government have published a non-statutory policy document, Planning Policy Statement 2015. It includes some key principles which will be pertinent to the formulation of the emerging LAP. Of particular note are:

- The requirement that planning should be plan-led and evidence based,
- Planning must proactively drive and support sustainable development,
- Planning should be about creating communities and further developing existing communities in a sustainable manner,
- Planning should encourage the most efficient and effective use of previously developed (brownfield) land over greenfield land.

Finally, consideration must be given to the cultural, economic and political backdrop against which this emerging plan will be developed. The cultural, economic and political landscape in Ireland has changed significantly since the adopted Bray Town Development Plan was prepared. We have moved from a period of relative housing oversupply to a housing crisis with significant shortfalls in housing provision. The Greater Dublin Area in particular is experiencing significant shortages. The ESRI estimate that 90,000 units will be required nationally between 2011 and 2021, of which over 60% (54,000) would be required in Dublin with a further 26% (23,400) required in the wider Greater Dublin Area encompassing Louth, Meath, Kildare and Wicklow<sup>1</sup>. Government policy, as set out in 'Construction 2020' and 'Rebuilding

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<sup>1</sup> <https://www.esri.ie/news/significant-housing-shortages-in-greater-dublin-area-predicted/>



Ireland', seeks to facilitate and encourage the development of these required housing units as quickly as possible, consistent with best planning practice.

***Regional Planning Policy:***

The relevant regional planning guidelines for Wicklow are the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (RPGs).

The RPGs set a population target of 176,800 and housing allocation of 82,012 for Wicklow by 2022. They also designate Bray a Tier 2 town – major town centres and county town centres, (Tier 1 is Dublin City), and a defined metropolitan consolidation town. The RPGs settlement strategy (Strategic Policy SP1) encourages:

- i. consolidation within existing built footprint with particular focus on the metropolitan area;
- ii. supporting the achievement of sustainable towns;
- iii. supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of land use and high quality public transport provision, and
- iv. build up economies of scale for services in identified growth towns.

***County:***

At a county level Bray is defined as the Tier 1 town in the settlement hierarchy of the County. The Wicklow County Development Plan 2016 – 2022, which is scheduled to come into force this month sets a population target of 158,000 for the county and a housing target of 77,328 by 2025 which will require an increase of 22,977 housing units within the County. These targets are below the RPG targets but broadly in line with the current Census figures, based on the 2011 Census and preliminary results from the 2016 Census. The Regional Planning Guidelines require that 42% of the growth allocated to Wicklow must be allocated to the Metropolitan Area settlements. This places a large burden on Bray as the tier 1 town in the County, and only town within the Metropolitan Area, to accommodate the majority of population growth and housing demand for the County.

The emerging County Development Plan is largely silent on the issue of infill development or backland development, which can play a critical role in consolidating the urban area consistent with Strategic Policy SP1 of the RPGs identified above.

The emerging Development Plan recognises the value, and supports the development of housing for people with specific needs such as the elderly and those with a disability, through encouraging developers to provide specialised housing as part of their Part V obligations (Policy HS9). Sheltered housing remains a major issue over and above the requirement for its provision in a Part V context.

***Bray Municipal District Local Area Plan 2017 – 2023 Public Consultation Booklet (the Issues Paper):***

The Public Consultation Booklet for the emerging LAP (hereafter referred to as the Issues Paper) indicates a population target of 36,240 for Bray by 2022 and 40,000 by 2028. In order to achieve this target there is a requirement to provide 8,000 new residential units within the municipal district, the majority of which shall be within Bray. The current capacity of zoned lands is approximately 4,750 units resulting in a shortfall 3,250 units. A primary objective of the emerging LAP shall be to set out how this housing target can be met consistent with the proper planning and sustainable development of Bray town and its environs.

We support the primary focus of the Issues Paper to identify the most suitable means of addressing this shortfall but emphasise the potential for assisting the achievement of this largest of should consider infill and brownfield sites upon which the issues paper is largely silent (especially in regard to infill).

**Key Requirements of the Emerging LAP:**

Based on the above we believe the key requirements of any emerging LAP will be as follows:

- Ensure the emerging LAP fully accords with current national, regional and local planning policy and current and evolving government policy on the housing crisis.
- Ensure the availability of sufficient land to meet Wicklow's and Bray's housing demand needs from now until 2023 and potentially 2028.
- Create a framework which will ensure all future development in Bray is plan-led, evidence based, sustainable and maximises the efficient use of resources.
- Encourages the redevelopment of existing sites, particularly brownfield sites, and minimises the reliance on greenfield sites to meet the housing needs of the area.
- Consolidate the built up area of Bray town.

**Our Submission:**

The Issues Paper poses a number of questions on how to meet the current and future housing demand of the Bray Municipal District. These questions include:

1. Should the focus be on the existing built up area of Bray town and allow housing and / or increase densities on any available lands? This would likely require the rezoning of certain sites throughout the town from employment / community / open space to residential or by increasing the density allowable of sites already zoned for housing or mixed use.
2. Should additional greenfield lands be zoned for new housing thereby expanding the size of the town?
3. Are there any other sites that should be considered for housing?
4. Should densities be increased on these sites?
5. What new education, community, sport and recreational facilities are needed and where should they be located?

We believe these to be particularly pertinent questions in the context of meeting housing targets, and our submission shall focus specifically on them.

**1. *Should the focus be on the existing built up area of Bray town and allow housing and/or increase densities on any available lands?***

Bray is defined as a Metropolitan Consolidation Town in the RPGs and is the primary, Tier 1, settlement in Wicklow. As stated above, Bray's position as the primary settlement in the County, places a significant burden on the town to accommodate the majority of housing demand in Wicklow. The issues paper estimates a requirement to provide nearly an additional 4,000 over that which can currently be accommodated in the town. A key consideration of the emerging LAP will be where to accommodate these additional units.

Best planning practice, along with advice contained in national and regional planning policy, advocates the consolidation of existing urban areas in the first and preferred instance as the means of meeting current developmental needs and the sequential development of zoned land. We would support a review of existing opportunity sites, and also smaller backland or infill sites, to identify and determine the role and broad numerical contribution that they can make to achieving the housing target consistent with best planning practice.

The Issues Paper queries if increasing densities would help meet Bray's housing needs. The current permitted densities in Bray Town, according to the existing Bray Town Development Plan, are 50 – 125 units per hectare (Section 12.3.2). This is a relatively high but achievable density, which based on the Sustainable Residential Development in Urban Areas Guidelines, is normally reserved for urban centres and sites in close proximity to major public transport hubs such as Bray. In light of this relatively high density there would therefore appear to be limited opportunities to increase densities further on the available lands.

We believe that rather than focusing on the issue of density, consideration should be given to the relief of potential constraints which may have prevented appropriately zoned sites from being developed. In particular the existing policies on infill development and backland development as set out in the existing Bray Town Development Plan (Sections 12.3.1.1 and 12.3.7), and the current development standards should be reviewed.

We believe that development on infill or backland sites could be facilitated where:

- The necessary infrastructure and services are in place to serve any future development.
- The proposed development respects and complements the prevailing scale, architectural quality and the degree of uniformity in the surrounding area.
- The proposed development ensures the protection of residential amenity with particular regard to separation distances, overshadowing and overlooking.

Furthermore in order to facilitate the release of infill or backland sites for development and to assist the Council in reaching their housing targets, we would ask the Council to apply flexibility with regard to achieving access to these sites. The provision of such access would be subject to meeting traffic and road safety requirements. Where access may be an impediment to the development of these sites we would request the Council to consider permitting shared access through adjoining sites, and potentially through areas of open space, where rights of way exist and the development of such access arrangements will not result in an unduly negative impact on the use or amenity of these open space areas. A policy or objective reflecting this in the emerging plan would encourage and facilitate sustainable utilisation of infill and backland sites.

A relaxation of certain standards such as parking and open space standards, could be considered where sites are within an acceptable distance of high quality public transport links and/or existing strategic areas of open space. A relaxation of such standards is supported by the Sustainable Residential Development in Urban Area Guidelines (Section 4.21) as long as best planning practice is provided and each case is considered on its merits.

***2. Should additional greenfield lands be zoned for new housing thereby expanding the size of the town?***

In light of the substantial shortfall in residential units required in Bray, it is likely that zoning additional greenfield sites will be required to be rezoned for development. This is likely the last acceptable solution on sustainability grounds. We believe however that Bray's Housing Strategy should include a multifaceted approach to meet the housing targets including a mix of consolidation of the town, maximising the development potential of existing sites, reductions in development standards where appropriate and the zoning of additional land where necessary. In this manner the emerging LAP would comply with the Planning Policy Statement by supporting sustainable development and encouraging the use of brownfield land over greenfield sites where possible.

***3. Are there any other sites that should be considered for housing?***

The Issues Paper identifies a number of sites, such as Bray Golf Club, which may be available for residential development. We have no comment to make in respect of these identified sites.

The Council also asks if there are any other sites which should be considered for housing. We believe there are a number of small infill sites scattered throughout Bray which could make a meaningful contribution to the housing targets. While these small sites may only be able to accommodate a limited number of residential units individually, cumulatively they can contribute to meeting the required housing targets and supporting the consolidation of the town. As stated above we would encourage the Council to review its policies on infill and backland developments to help facilitate the development of these smaller sites.

**4. *Should densities be increased on these sites?***

As we have stated above, we believe there is a limited sustainable argument to increase the densities in Bray, which are currently quite high unless in the most extreme circumstances of greatest public transport accessibility such as in the very centre of Bray. We believe the focus should be on other development standards and additional flexibility should be applied to development standards where appropriate in order to facilitate the sustainable development of existing town centre and other infill sites. In particular we would suggest a review of car parking standards and open space standards. Both consume significant land within sites which can be challenging to accommodate development on physically constrained sites. Furthermore both can easily be compensated for by the availability of high quality public transport and open space in the area, without any impact on the amenity of existing or future residents.

**5. *What new education, community, sport and recreational facilities are needed and where should they be located?***

In addition to submissions on how to meet the future housing need of Bray, the Council also seek submissions on the provision of education, community, sport and recreational facilities. In their consideration of the need for future community facilities, we would ask the Council to consider the potential role of sheltered and/or elderly housing developments in Bray. Sheltered and/or elderly housing developments can provide an important service to the local community, while helping to meet a specific housing need. In the case of elderly housing they can also contribute to meeting housing targets by allowing elderly people the opportunity to downsize from their family home into a more suitable unit within their local community and releasing underutilised family homes to the wider market. Currently the Council's policies in respect of sheltered and/or elderly housing are limited to contributions to Part V Social Housing provision. We would ask the Council to consider the formulation of policies which would support the development of sheltered and/or elderly housing within the town, particularly as an option to utilise infill sites outside of the Part V framework. We believe such developments would make a valuable contribution to meeting specific housing needs within Bray Municipal District.

**Conclusion:**

In summary, we believe the new emerging LAP should consider:

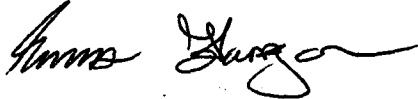
- The potential to maximise the development potential of existing zoned sites, particularly in the town centre and existing residential areas.
- Development of a multifaceted approach to the housing crisis, and meeting the housing targets for Bray involving development on a range of sites zoned, unzoned, infill, brownfield etc.
- Review the existing policies on infill and backland development.
- Facilitate flexibility in the provision of access arrangements for infill and backland developments.
- Consider permitting a reduction in certain development standards on constrained, infill sites, where such reductions would not result in a negative impact on residential amenity or the character of the area.

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LAND PLANNING & DESIGN**

- Limiting the zoning of additional greenfield sites, pending the development of existing zoned sites.
- Consider developing policies which support and encourage the development of sheltered and/or elderly housing.

We await with interest the development of an LAP for the Bray Municipal District and look forward to engaging further with the Council on this matter.

Yours sincerely



**Emma Flanagan** MIPI MRUP  
Executive Town Planner  
**CUNNANE STRATTON REYNOLDS  
LAND PLANNING & DESIGN**

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

**Leonora Earls**

**From:** Amanda Mannix [mailto:amannix@kilderry.ie]  
**Sent:** 11 September 2017 17:41  
**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:** Submission for Potential Development in Kilruddery Estate

Dear Sir/Madam,

We are writing as concerned residents of Swanbrook, Southern Cross Road, Bray in opposition to the proposed re-zoning of land in Kilruddery Estate.

We would raise a number of concerns/reasons why this re-zoning and any potential development should not take place in Kilruddery Estate:-

**Flooding**

There are a significant number of houses in Hollybrook Estate prone to flooding, due to water run off from the hillside in Kilruddery. Further development of houses will only increase flooding to these houses and potentially affect even more houses across the Swanbrook and Hollybrook estates.

**Traffic/Road Infrastructure**

Southern Cross Road and the surrounding roads are already affected by extremely heavy traffic and at a standstill during peak periods (as an example, to get on to the N11 northbound from our house in Swanbrook, a distance of approximately 3 km, regularly takes over 30 minutes in the morning rush-hour. Southern Cross Road and Windgates cannot take any additional traffic and if any development was to go ahead, it would potentially see another 300 - 500 cars accessing these roads, which the current road infrastructure cannot take. This would merely cause further significant delays, pollution and frustration for residents of the area.

**Industrial/Retail Park**

There is no justification to increase the industrial Estate adjoining Hollybrook when there is development land on Southern Cross Road that has been sitting vacant for over 9 years as well as the former Dell site which has also been sitting vacant and is becoming a derelict site. If there is a genuine need for further industrial/retail sites in Bray, then these sites should be developed.

**Local Amenities**

There is already a lack of amenities to service the housing estates along Southern Cross Road (e.g. shops, green public spaces). There have been numerous promises of improved amenities and these have never come to fruition. Therefore we would have no confidence in any promise that these will be provided with any future developments. You cannot continue to build housing in areas where there is not sufficient local shops and amenities to service these areas. Kilruddery Estate itself is one of the few good amenities for the area and the idea of developing this land would be to repeat the errors of Celtic tiger era developments where housing is built with grossly inadequate supporting amenities, in the forlorn hope that the private sector will meet this vital need.

**Public Transport**

The public transport service is not sufficient to service the current volume of housing/business along Southern Cross Road, let alone an increased volume. We have been told by a Bray councillor at a recent public meeting that while there are plans for transport in the 2020 Transport Plan for the Fassaroe area, there are no plans for improvements to service Southern Cross Road areas. Given the serious issues relating to traffic as mentioned above, this lack of any proposed public transport improvements would ensure worsening chaos on the roads in this area.

**Natural Environment**

There are three beautiful and natural areas surrounding Bray – Bray Head, the Great and Little Sugarloaf mountains. We are blessed to be surrounded by such natural beauty and it must be protected against all future development so that residents, tourists and future generations can enjoy them as we have to date. No doubt, this was the reason, in 2008, that the then Green Party Minister for Environment, John Gormley, directed that the Great and Little Sugarloaf



Mountains be designated an area of special amenity. The failure to implement the SAAO by Wicklow County Council for Little Sugarloaf is the reason this development can even be contemplated now. However, by voting against this proposal, the current councillors can ensure this area remains available as a natural amenity for all.

Kilruddery Estate has been providing entertainment and family enjoyment over the years in the form of concerts, events, markets and adventure races to name just a few. Wicklow County Council should be supporting Kilruddery Estate to continue to benefit the community and work with them to maintain the natural amenity on our doorstep rather than seeking to put housing and industrial developments in this area of outstanding beauty.

For the reasons above, we strongly object to re-zoning for potential housing and commercial/industrial development on the foothills and/or surrounding grounds of Kilruddery Estate.

Thank you for taking the time to hear our concerns and we look forward to hearing back from you.

Yours sincerely,

Brendan and Amanda Mannix  
96 Swanbrook  
Southern Cross Road  
Bray  
Co Wicklow

**Leonora Earls**

---

**From:** Isolde Moylan  
**Sent:** 15 September 2017 13:02  
**To:** Planning - Plan Review  
**Cc:** Paul Murphy (No 8); Eileen Maguire; stoneyroadpress. com; Tom Mobile; Petcus; Dom Murray; Mary Lord; Frank Bonadio; liz mcmanus  
**Subject:** Submission from Residents of Martello Terrace Bray re draft Bray Municipal District LAP 2017  
**Attachments:** MARTELLO TERRACE Submission re Bray Development Plan.docx

Administrative Planning Officer  
Wicklow County Council  
Wicklow

Please find attached hereto Submission under the Public Consultation exercise from the Residents of Martello Terrace Bray re the draft Bray Municipal District LAP 2017 .

We would appreciate confirmation of receipt of this submission within the timeframe of the consultation, feedback on the issues and concerns raised in due course and these being addressed in the final version of the Plan.

Thank you

Isolde Moylan  
on behalf of the Residents of Martello Terrace, Bray

cc: Bray Councillors  
Bray Administrator  
Bray Engineer

## **MARTELLO TERRACE RESIDENTS ASSOCIATION**

### **Re: Bray Municipal District Local Area Plan 2017 Submission under the Public Consultation exercise from the Residents of Martello Terrace, Strand Road, Bray**

The residents of Martello Terrace, Strand Road, Bray, have read and discussed the draft Bray Municipal District Local Area Plan 2017. As stakeholders in Bray and its future, we welcome the opportunity to input into the planning process for the development of the town in the coming years. In particular, given the special location of Martello Terrace as a linking point between Bray Seafront and Harbour and its historical, architectural and visual importance in these contiguous parts of Bray's seaside area and the town more generally, we wish to be involved in, consulted about and pro-actively engaged in, all development planning for these areas, as well as in broader aspects of the town's development. We welcome the fact that the draft Plan acknowledges in two specific references (in Sections 7.1 and 7.2, pages 38-40 and 63/64) the unique status and location of Martello Terrace in the context of both the Seafront and the Harbour areas, recognises Terrace residents as key stakeholders in this area and provides for consultation with us on issues relating to the development of these areas.

The residents of Martello Terrace broadly support much of the vision, objectives and ideas for Bray as set out in the draft District Plan 2017, including many of the plans relating to the Seafront/Harbour area. We have, however, some strongly held observations and concerns which we hope will be addressed in the final version of the Plan:

#### **1. Bray Seafront**

##### **- General**

Residents of Martello Terrace welcome the emphasis placed in the draft Plan on preserving and enhancing the historic and architectural heritage of the Bray's unique Seafront, its special tourism amenity character and its natural environment, whilst seeking to generate additional tourism numbers, facilities, services and business. We very much agree that all future development in this area must harmonize with the existing historical and architectural heritage of the Seafront and the roads around it, including a prohibition on buildings of more than 4 storeys, other forms of building incompatible with the Seafront's heritage, style and character, and an insistence on maintaining the current frontage line set back from the road. We welcome the assurances set out in the Plan that 'additional new development will not be permitted on land zoned as OS1 on the east side of the Strand Road from Martello Terrace to Bray Head' on the Seafront (page 39). We feel it important also that temporary events taking place in this area are stringently controlled to prevent damage to this key amenity area (like cutting away part of the heritage railings on the promenade as one such event did a couple of years ago), noise and interference with the residential character of much of the Seafront.

##### **② Traffic & Parking**

It is clear to residents of Martello Terrace, as it must be for the Council also, that the single most serious problem facing Bray Seafront and the Harbour area is traffic and parking but this is almost completely ignored in the Draft Plan and in no way addressed. This problem, which has been mounting steadily and which will only worsen further with time is impacting very negatively on both residents and visitors and contributing to environmental pollution and degradation. There are insufficient designated parking spaces on the Seafront to cater for even daily demand - the result of which is cars crawling along looking for spaces, backing up, trying to turn around, double-parking, parking on double-yellow lines and in other unauthorised

places, including sometimes on our Terrace. At weekends and in the summer months in particular, queues involving hundreds of cars stream down over many hours onto the Seafront, principally from Seapoint Road, and out again in the late afternoon/evening, clogging up the the whole stretch from the top of Seapoint Road to the far end of the Seafront, with the whole Harbour area equally clogged and congested. Even if all the entire grassy esplanade was dug up to make way for parking (which of course would be unacceptable and unthinkable), this would not solve the problem.

It is clear to us, therefore, as it should be to the Council, that the current parking and traffic problems can only be resolved by a long-term, sustainable strategy to divert all but local residential and commercial vehicular traffic away from the Seafront and Harbour areas and accommodate them elsewhere. Martello Terrace residents call for the urgent development of a traffic management strategy to be set in motion without delay, in consultation with local residents and businesses, which will involve restricting vehicular access to the Seafront and Harbour zones to local residential and commercial traffic and the new school shuttle buses, adequate parking away from this whole area, a system of mobile electronic signage to direct vehicular traffic to alternative streets and parking areas, ideally some kind of shuttle transportation from public transport and car-parks to the seaside areas, strong encouragement of the use of public transport and prioritization of pedestrians and cyclists in these zones. Substantially increased fees for parking on the Seafront should also be introduced, both to reduce the level of traffic aiming to park there and to generate income that could be used, for example, to fund mobile electronic road signs, which we understand to be costly.

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

#### **☒ *Interim Road/Traffic Management Measures***

In the short term and by way of interim measures to alleviate the serious congestion which so often arises at the northern end of the Seafront along our Terrace's western boundary, especially with traffic coming from and to Seapoint Road, and the very dangerous conditions which currently exist from under the railway narrow bridge and around the sharp bend, Martello Terrace residents wish to see some urgent easing of traffic problems on the roads adjacent to our Terrace, which have long been dangerous and often congested, problems which are going to be seriously aggravated by the current road-works which have added a (welcome) double-lane bicycle path to the stretch of road along the railings on the western perimeter of our Terrace, but which have also narrowed the road for motor traffic, increased the sharpness and blindness of the curve on that part of the road, and necessitated - we are told - the narrowing-in of the road to one lane - with a two-way 'Yield' sign - in the vicinity of our south gate and the entrance to/exit from the Seafront's southern car-park, which will cause even further traffic chaos if it is introduced. As alternative to the plan to insert this narrowing-in point on this part of the road at this point, Terrace residents believe that a better option is probably to introduce a one-way traffic system for all but local residential and business traffic and the new schools shuttle bus, at least on the stretch on Seapoint Road from Seymour Road to the southern Seafront car-park or even Quinnsborough Road to the south, and the Harbor to the north, in whichever direction is felt best by the expert road engineers of the Town and

County. We call on the Council to draw call on the technical expertise available to it to explore this formal proposal from our residents without delay and to provide feedback to us on these as soon as possible.

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

Finally, with a view to preventing blocking of our exit and entrance to the Terrace when the traffic flow is heavy as happens very frequently, and to ensure access for emergency vehicles should the need arise, it is essential for us that a 'yellow box' is marked out on the road outside both our western and southern gates respectively, with a third one also necessary at the back entrance gate of the Terrace , behind No. 8 on the Terrace on the Harbour road (behind No. 8 on the Terrace) - this was there previously but with road-works it has disappeared.

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

## **2. Bray Harbour**

### **☐ General**

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

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

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

### ☐ ***Harbour-Seafront Link for Future Planning Purposes***

As essentially an extension of the Seafront area, and completely different in character and needs from the old Golf Club site, we are strongly of the view that development planning for the Harbour area must logically be linked and zoned with the Seafront, with the latter development criteria applied to it, and not with the development of the old Golf course where different objectives and criteria can legitimately apply - and which is in any case largely cut off from the Harbour by the railway track. In the main body of the draft Plan (pages 38/39), the Harbour area is quite correctly covered as an individual zone but then, rather inexplicably, in the SLO3 Section and Map (pages 63/64) it is lumped together with the development of the old Golf Course and this, our residents, feel strongly, is not appropriate. The Harbour is a special and unique feature and attraction of the town, part of the town's seaside heritage and environment and as such, for future planning purposes, it should be treated separately from the Golf Course and as an extension of the Seafront. Following on from that, forward planning for the Harbour area should be in line with that for the Seafront and the development criteria set out for it. While a case may be made for intensive residential and commercial development for parts of the Golf Course site, including buildings higher than the 4-storey limit applicable to the Seafront, our Terrace Residents do not support intensive or high development of the Harbour area. While some residential and commercial development may be appropriate, even welcome, on the industrial site immediately to the north of the harbour, we would very vociferously oppose this being any higher than 4 levels high - this is not an appropriate location for a Costa Brava Mark 2.

### ***- Harbour Dredging/Removal of Previous Sewage Outlet Pipe***

Dredging of the Harbour will be essential to maintain and develop boating and related recreational activities and ancillary services and businesses and it is the hope of our residents that the dredging exercise will also involve the removal of the badly-placed outlet pipe through the harbour from the previous sewage works, which has greatly affected the yachting and boating sector in the harbour and, with that, the development of the full amenity potential of this beautiful area. With the redirection of Bray sewage to Shankill, residents of Martello Terrace hope that it will now be possible for the old sewage pipe outlet through the harbour can and will be removed to facilitate use by larger and more numerous craft.

### ☐ ***Harbour-Riverside Boardwalk Connectors***

One last but important proposal which our Terrace residents wish to put forward in relation to the Harbour area is for the very welcome new walkways on both sides of the Dargle river to be extended eastwards to connect to the harbour area, which would undoubtedly greatly enhance the recreational value of the area, its attraction for visitors and its commercial potential. We would much appreciate it if the Council could provide some feedback to us regarding this proposal.

### **3. Old Bray Golf Course Site**

Martello Terrace residents recognise the need for additional residential accommodation in Bray and are largely supportive of the ideas set out in this regard in the draft Plan. While we would not object in principle to the idea of intensive building in the location of the old Golf Club, we like many other residents of Bray have serious concerns about the wisdom and viability of such building development on a floodplain which no effort to date has succeeded in resolving, including the flood-defence works which have been carried out but which have already been breached in severe conditions. We are all aware of the catastrophic consequences of building on flood plains for the homes, businesses and other facilities erected on such flood plains or in their vicinity in many areas of Ireland and it is vital that Bray heeds the lessons from these experiences and not delve our town into such crises here. The expert advice

available, including from An Taisce, is that large-scale building on this site should be avoided and, in the absence of convincing evidence to the contrary, it is vital that the Council exercise extreme caution in proceeding with the development of this site, though plans for a substantial parking area on it to relieve pressure on the town and seafront and the public greenspace/recreation area envisaged in the draft Plan should certainly be put into motion as soon as possible.

#### **4. Seapoint Road to Quinnsborough Road Walkway behind Carlyle Grounds**

Martello Terrace Residents are concerned about the walkway running along the back wall of the Carlyle Grounds from near the railway bridge on Seapoint Road to the level-crossing area of Quinnsborough Road, which is a useful route for residents of our Terrace to take to the station as it cuts out the delays crossing the tracks when the level-crossing gates are down - as they so often are - or having to scale the footbridge. However, few of us are brave enough to use this path, which daily and nightly attracts groups of loiterers with a menacing air about them (though in fact we have not personally encountered any hostile behaviors on their part, at least in daylight hours) and extensive littering with bottles (often broken and highly dangerous), cans, take-away rubbish and other litter, which is only infrequently cleaned up, which is not properly lit, and where we suspect that the visible CCTV camera at the station end of the lane does not cover the whole length of the lane. We call on the Council to work out a plan in consultation with the local Garda Siochana for dealing with this dirty and potentially dangerous track as soon as possible and to inform us of the measures being taken.

#### **4. Bray Station Area/Transportation Hub**

The residents of Martello Terrace are very much in agreement with the designation in the draft Plan of Bray's station area as a key transportation hub and entry point to the town and on the need to develop this disgracefully near-derelict area (especially the former Cash and Carry site) to serve the needs of Bray's own commuters and residents and the many visitors to the town. Regrettably, previous efforts to enhance and revitalise this area have failed miserably and, regrettably also, the draft Plan contains little in terms of concrete ideas, much less plans, for the development of this vital area and previous efforts. Clearly some fresh thinking is needed if a viable and appropriate development scheme is to be identified and funded. Our residents believe that there is a great deal of community interest in Bray in seeing something done with this area and it is our proposal that a public consultation exercise be carried out to identify some viable short- and medium- term options for the use of the site, as well as longer-term ones, beginning perhaps with a public meeting at an early date.

It is also very much the hope of our residents that agreement can be reached on the extension of the Luas to Bray with its terminus adjacent to the train station.

#### **5. Carlyle Grounds**

Martello Terrace residents very much hope that the Carlyle Grounds, or most of it, can be retained as a green space.

#### **6. Need for More/Better Hotel Accommodation**

With some of our residents active in Bray's business community, we believe there to be a glaring need for at least one good, large, hotel and Bray as current hotels are either large and of very poor standard, too small for medium- to large- groups of guests or too noisy for business customers so much potential business for Bray is being lost to other towns like Dub Laoghaire. This serious gap is not mentioned in the draft Plan, but it should be rectified in the final version and a strategy identified to attract in an appropriate investor to undertake this project. The Bray Head Hotel, regrettably recently sold to a foreign fund, and clearly in need of considerable



investment, would appear to us to have been a prime location for the sort of hotel which Bray so badly needs and we wonder if it may still be an opening for its retention and serious upgrading into a prestigious hotel for Bray.

#### **7. Other Road Issues**

With many of our residents being regular users of the M50 motorway and sufferers of the serious and dangerous congestion and hazards of the M50/N11 merging point, we are strongly supportive of the provision in the draft Plan identifying this issue as one for urgent attention in the coming years. ☒

We would be grateful to receive confirmation of receipt of this submission within the timeframe of the public consultation process, for a response to the issues raised in due course and for these issues and concerns to be addressed in the final version of the Development Plan.

Thank you.

On behalf of the residents of Numbers 1 to 8, Martello Terrace, Bray

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Isolde Moylan  
6 Martello Terrace  
Strand Road  
Bray A98 DY86  
Email:  
Mobile

15 September 2017

Sorcha Walsh S.P.

C184

112, Hollybrook Park,  
Southern Cross Road,  
Bray,  
Co Wicklow.

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

Mr Bryan Doyle,  
Wicklow County Council,  
County Buildings,  
Whitegates,  
Wicklow Town.



Ref: Proposed Rezoning of Kilruddery/Little Sugarloaf Lands  
(Bray Municipal District Draft Plan)

Dear Mr Doyle,

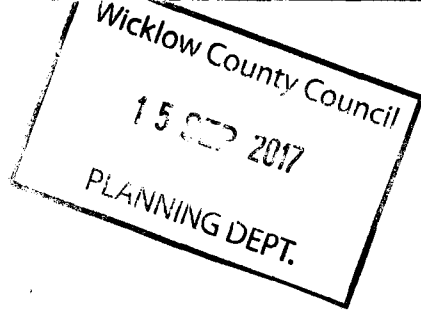
I have been made aware of the proposal to rezone lands on the Little Sugarloaf for residential and industrial use.

I wish to lodge my objections to this proposal for several reasons.

- This development would destroy an area of natural beauty which should be preserved for future generations to enjoy.
- This development would need vehicular and pedestrian access (the location of which has yet to be decided) and I am concerned about the dangers through traffic (both vehicular and pedestrian) could bring for children playing in our estate.
- I am also concerned about the extra volume of traffic on the Southern Cross Road, it can be very congested even now.
- This proposed residential and industrial development to the rear of our estate would completely change the quality of life here in Hollybrook Park, at the foothills of the Little Sugarloaf.

Yours sincerely,

*Cathy Mason*  
Cathy Mason



C185

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

## **Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

### **1. Natural Amenity:**

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

### **2. The Character of Kilruddery Demesne:**

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

### **3. Flooding:**

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed



Address

111 Hollybrook Park

Bray

Co Wicklow

**Leonora Earls**

---

**From:** Ian McGrandles  
**Sent:** 15 September 2017 16:11  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Municipal District Local Area Plan 2017-2023  
**Attachments:** Submission to WCC 15-09-17.pdf

Dear Sir/Madam

Please find attached a submission in respect of the Draft Bray Municipal District Local Area Plan 2017-2023.

I should be grateful to receive an acknowledgement of same by return.

Kind Regards

**Ian McGrandles**  
**Director**

**IMG Planning Limited, 75 Fitzwilliam Lane, Dublin 2**

**Telephone: +**

**Mobile: +**

**Email:**

Directors: IM McGrandles, M McGrandles. Registered in Dublin, Ireland: 497912. Registered Office: As above.





Administrative Officer  
Wicklow County Council  
Planning Section  
Station Road  
Wicklow Town

15 September 2017

(By email: e)

Dear Sir/Madam

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

On behalf of Michael McAteer and Patrick Dillon, Joint Receivers over Certain Assets of George Wilkin (In Receivership) of Grant Thornton, 24-26 City Quay, Dublin, D02 NY19 this submission is made in respect of the proposed rezoning of lands on Upper Dargle Road/Love Lane, Bray.

This submission seeks to present the case to amend the Draft Local Area Plan to adjust the extent of the proposed zoning Objective 'OS2' of the lands and to rezone a part of the lands for residential purposes.

### **Location of Subject Lands**

The land holding that the subject lands form part is located within the administrative areas of Dún Laoghaire-Rathdown County and Wicklow County (Bray Municipal District). See Figure 1 overleaf. The County Brook Stream forms the boundary between the two local authorities.

The larger northern section of the lands (c. 1.78 hectares) to the north of the County Brook Stream is located within Dún Laoghaire-Rathdown County and the smaller section, to the south of the Stream (c. 0.486 hectares) is located within Wicklow County. It is the latter section that is proposed to be rezoned and that is the subject of this submission.

There is a low level bund along the western boundary of the lands with the M11 and there is tree planting along the slope of the motorway corridor.

**75 Fitzwilliam Lane, Dublin 2, Ireland**

T +353 1 678 9837 \ Company Registration Number 497912  
E info@imgplanning.ie www.imgplanning.ie \ VAT Registration Number 9784011J

Directors: IM McGrandles, M McGrandles. Registered in Dublin, Ireland. Registered Office: As above.



**Figure 1:** Location and context of the subject lands

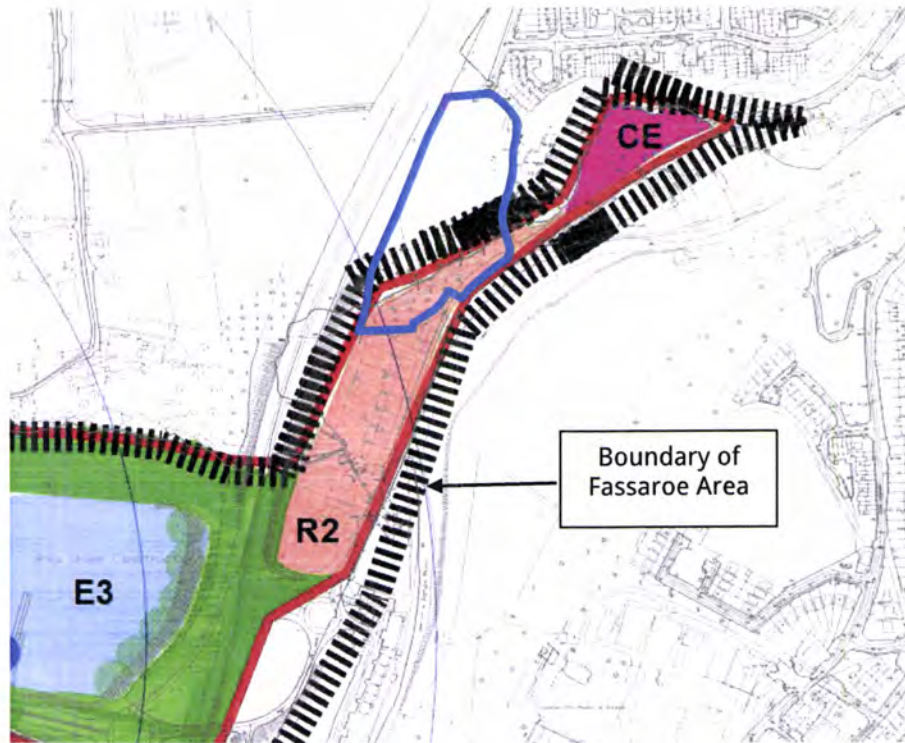
### **Current Zoning of the Subject Lands**

The subject lands are zoned objective 'R2' - 'New Residential - Medium to Low Density' in the Bray Environs Local Area Plan 2009-2015. See Figure 2 overleaf.

The vision of the objective is to ensure that the proposed medium to low density residential development is undertaken in a sustainable manner and that in particular regard is had to the provision and accessibility of social and community infrastructure.

The lands are included within the Fassaroe section within the Local Area Plan area. For the purposes of this section, the lands zoned R2 are identified at an average density of 50 units per hectare.





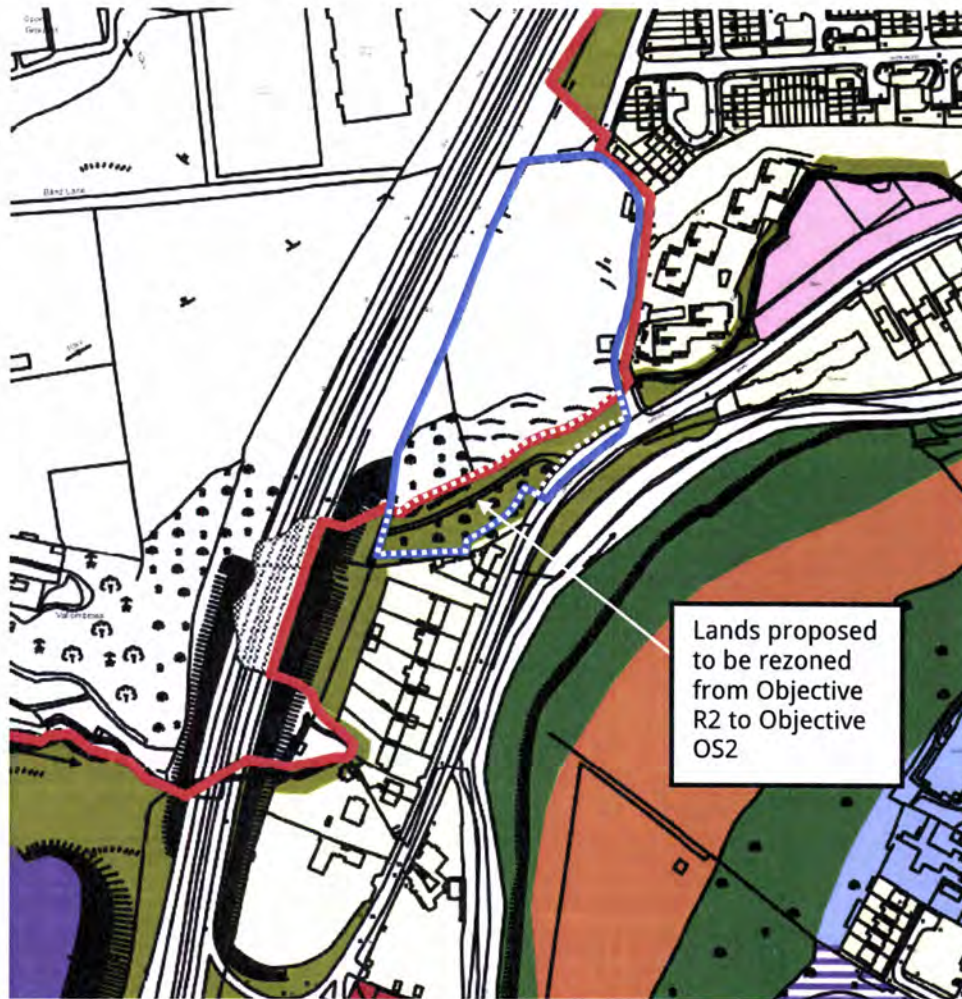
**Figure 2:** Current zoning of subject lands in Bray Environs Local Area Plan 2009-2015

### **Proposed Zoning of the Subject Lands**

In the Draft Local Area Plan it is proposed that the subject lands are to be zoned Objective 'OS2: Open Space': "To protect and enhance existing open, undeveloped lands". See Figure 3 overleaf.

The purpose of the objective is "to protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity."





**Figure 3:** Extract Map 2: Bray and Environs, Draft Bray Municipal District Local Area Plan 2017-2023

### **Submission in support of request to amend the Draft Local Area Plan**

This submission seeks the amendment of the Draft Local Area Plan to adjust the extent of the proposed zoning Objective 'OS2' of the lands and to rezone a part of the lands for residential purposes.

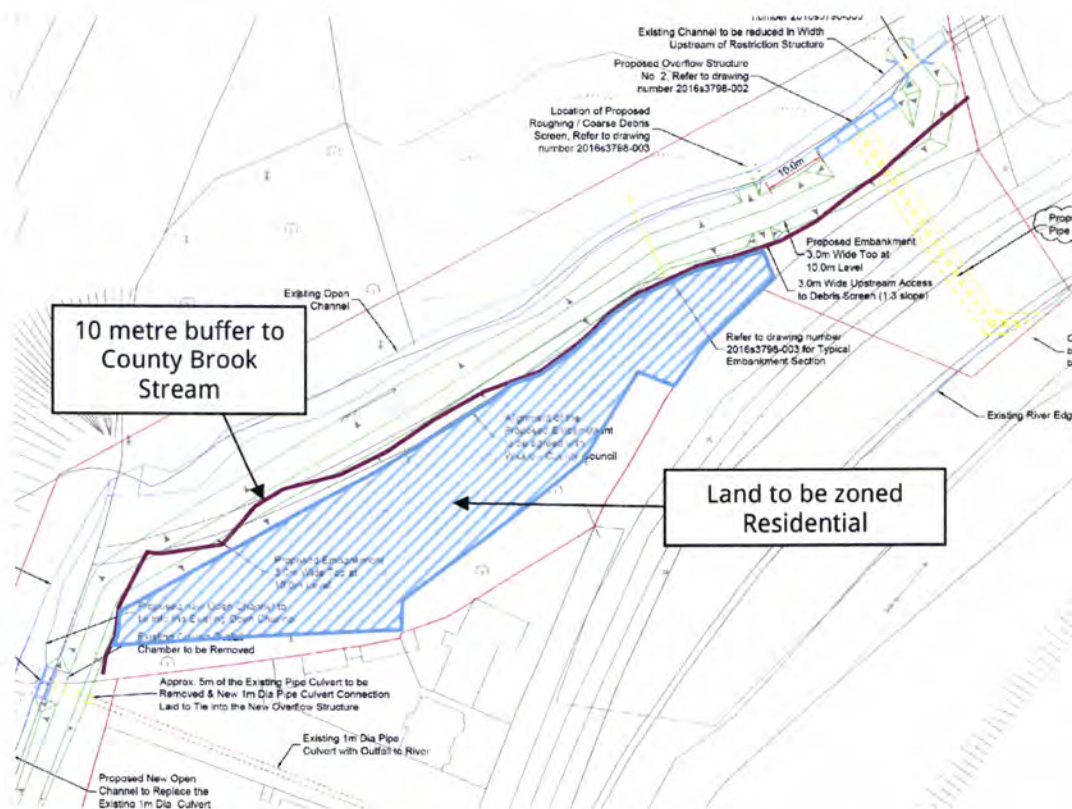
A review of the Draft Development Plan would indicate that the proposal to rezone the subject lands (as Objective OS2) is based on the strategy of providing for a Green Infrastructure within the Plan area.

It is acknowledged that the strategy of establishing a network of green spaces and the key environmental and community benefits for doing so have merit ; however it is submitted that the contribution that the subject lands makes to the achievement of this strategy is moot. The lands do not connect with any of the other lands it is proposed to zone either Objective 'OS1' or 'OS2' – the N11 is to the east and the southern bank of the River Dargle is across Upper Dargle Road and the river itself. As a consequence of undertaking the minor realignment of the County Brook Stream, all of the mature trees and undergrowth on the



lands that provided its naturalistic setting have been removed and the lands have effectively been cleared. Further, it is unclear to what extent the lands will be landscaped after the realignment and associated earthworks have been completed. It is submitted that given the above, at present the subject lands would not be an effective part of a Green Infrastructure within the Plan area.

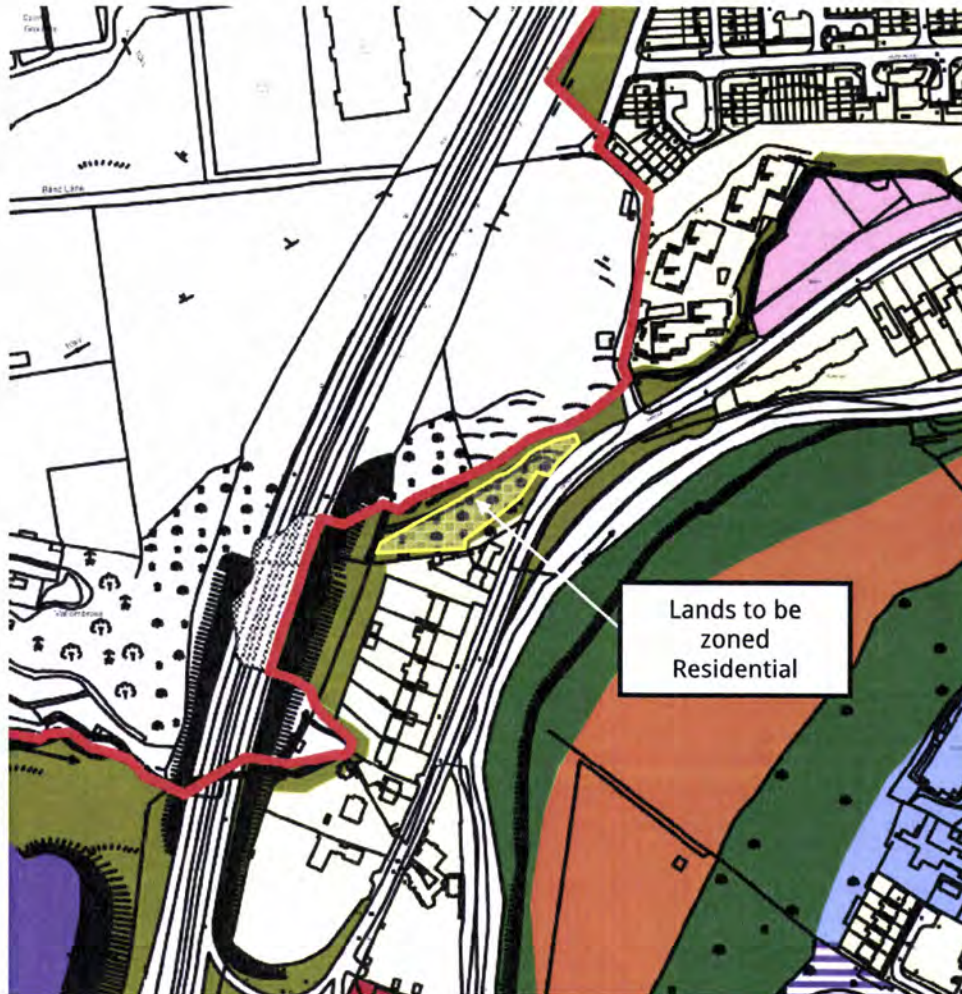
Notwithstanding, it is acknowledged that in the future the lands could be an effective part of a Green Infrastructure within the Plan area; however it is submitted that the entire of the subject lands would not be required to be zoned Objective 'OS2' for it to do so. As a consequence of the minor realignment of the County Brook Stream and particularly the embankment that will be constructed along the southern side of the Stream, the lands are on either side of the Stream effectively a form a corridor as opposed to a wider open space. The southern edge forms to southern extent of this corridor. Between this, and the 10 metre buffer area (from the Stream) required under Objective GI3 of the Draft Local Area Plan, and Upper Dargle Road there is a residual part of the subject lands that will be fully protected from flooding from the Stream that have frontage onto the adjoining public road. See Figure 4 below.



**Figure 4:** Proposed amendment to the Draft Local Area Plan

It is submitted that this part of the site is appropriate for residential development. Residential development would reflect the existing residential development to the south and represent of continuation of same.

It is therefore requested that the lands identified in Figure 5 below are rezoned from Objective 'OS2': "Open Space" as proposed in the Draft Local Area to Objective 'R20': "New Residential"



**Figure 5:** Extract Map 2: Bray and Environs, Draft Bray Municipal District Local Area Plan 2017-2023

We trust that the County Council will have due regard to the above in the formulation of the Local Area Plan.

Yours faithfully

*Ian McGrandles*

**Ian McGrandles**  
Director



**Leonora Earls**

---

**From:** Anthony |  
**Sent:** 14 September 2017 19:50  
**To:** Planning - Plan Review  
**Cc:** Deputy Simon Harris T.D.; Deputy Andrew Doyle T.D.; Deputy Stephen Donnelly T.D.; PCasey@oireachtas.ie; Deputy John Brady; 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; ministers.office@ahg.gov.ie  
**Subject:** Wicklow County Development Plan 2016-2022, proposed variation

Sir/Madam

As residents of Swanbrook, we wish to make some observations in relation to the proposed variation to the Wicklow County Development Plan 2016-2022, specifically in the Bray Municipal District and the proposed rezoning of land for residential use behind the estates of Swanbrook and Hollybrook Park - Map 2, R20 New Residential refers.

Currently, the Southern Cross is effectively an urban sprawl on the perimeter of Bray with few or no facilities, retail or otherwise. Despite being only 22km from the city centre it has a very poor public transport service. To rezone land for more residential use will have the sprawl spread out further and destroy some of our natural heritage. There is also land lying idle on the Southern Cross for years as well as at the old Dell site nearby and this should be developed before any rezoning of other land occurs. The traffic congestion in the town itself and on the N11/M50 will only get worse if issues are not addressed before adding more residential units to the Southern Cross area or indeed anywhere else in Bray.

In relation to access to any proposed new residential zoning at R20, if this is to be either in through the gate in Swanbrook/Earlscroft into Killruddery or close by, it will be interfering with the habitat of the barn owl - one of our red listed endangered species in Ireland with only c. 1,000 pairs left in the country. Serious consideration needs to be given before any decision is made which will have even the slightest impact on this endangered species.

As well as Wicklow Ministers, Oireachtas Members (and Councillors for their consideration prior to voting), I have copied this email to Minister Heather Humphreys as no doubt her officials in the National Parks and Wildlife Service will take a keen interest if there is any potential danger to a red listed species by any proposed rezoning.

Yours sincerely

Anthony and Julieann McCarthy  
 45 Swanbrook  
 Bray  
 Co. Wicklow

**Leonora Earls**

---

**From:** Jenny McCormick [jenny.mccormick@bray.ie](mailto:jenny.mccormick@bray.ie)  
**Sent:** 15 September 2017 17:25  
**To:** Planning - Plan Review  
**Subject:** Bray MD LAP

To whom it may concern,

Taking an organic/sequential approach, the remaining significant infill and opportunity sites around Bray e.g. the old golf club, Castle Street, Rockbrae and Dell sites, and mid-Boghall Road/Southern Cross sites, should be developed first (at a mid-high level density), before the rural /greenbelt fringes are re-zoned and/or highlighted for development under an LAP.

Notwithstanding the previous permissions for a supermarket and mixed commercial, light industry/offices and a link road; the Boghall Road/South Cross 'NC' and 'E' zoned sites ('Superquin' and 'Scheering Plough' sites)) between Deer Park and Oak Glen View), should be highlighted in the AP as suitable for development at a relatively high density and site coverage (not for surface car parking, as one of the few large Bray infill sites), with an emphasis on residential apartments e.g. like 'The Headland' Bray, or Mt. St. Annes and Bushy Park, Milltown/Terenure, as well as for the previously proposed commercial and community uses and link road.

Yours,

J. McCormick

83 Hillside,

Greystones

**Leonora Earls**

---

**From:** Reception [  
**Sent:** 13 September 2017 15:38  
**To:** Planning - Plan Review  
**Subject:** Estate of James Byrne deceased  
**Attachments:** to Wicklow County Council 13.09.17 (2).pdf

Dear Sirs,

Please see attached.

Kind regards

E. M. O'Beirne

Cullen Tyrrell & O'Beirne

Cullen Tyrrell & O'Beirne Solicitors

3 Prince of Wales Terrace,

Bray, Co. Wicklow.

PH:                      FAX:                      DX:16009 Bray

email: \_

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Thank you.



# Cullen Tyrrell & O'Beirne

Solicitors  
Commissioners For Oaths  
No.3 Prince of Wales Terrace, Bray, Co. Wicklow, A98 Y286.

E.M. O'BEIRNE  
E.J. O'BEIRNE  
S. P. O'CONNOR  
N.D. MCGANNETY

Please quote our reference:

Date: 13 September 2017

Our Ref:  
**EMOB/LD/BYR62-1**

Your Ref:

## REGISTERED POST

**Our client: Thomas McDonald the Personal Representative of James Byrne late of Como, Bohilla Lane, Kilmacanogue, Co. Wicklow deceased**

Dear Sirs,

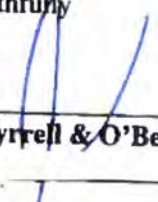
We act on behalf to Thomas McDonald the Personal Representative of James Byrne late of Como, Bohilla Lane, Kilmacanogue, Co. Wicklow deceased who has consulted us in relation to the proposed new development plan that would seriously impact on the deceased's Farmland at Kilmacanogue North, Co. Wicklow. Might we add our client inherited the property from his late uncle and we are waiting for Probate to issue.

For ease of reference we enclose herewith photocopy map showing our clients property edged green thereon and you will see from an area edged red and hatched green that the proposed new relief/slip road and rezoning will have a serious impact on our clients farm resulting in his access to water closed off by the proposed development.

In light of the above please treat this letter as an objection to the proposed development plan on behalf of our client Thomas McDonald of 5 Glendassan Close, Harbour View, Wicklow.

We are sending this letter to you by Registered Post and we would be obliged if you would kindly acknowledge receipt.

Yours faithfully

  
Cullen Tyrrell & O'Beirne  
email:

Email:

The Administrative Officer  
Wicklow County Council  
Planning Section  
Station Road  
Wicklow

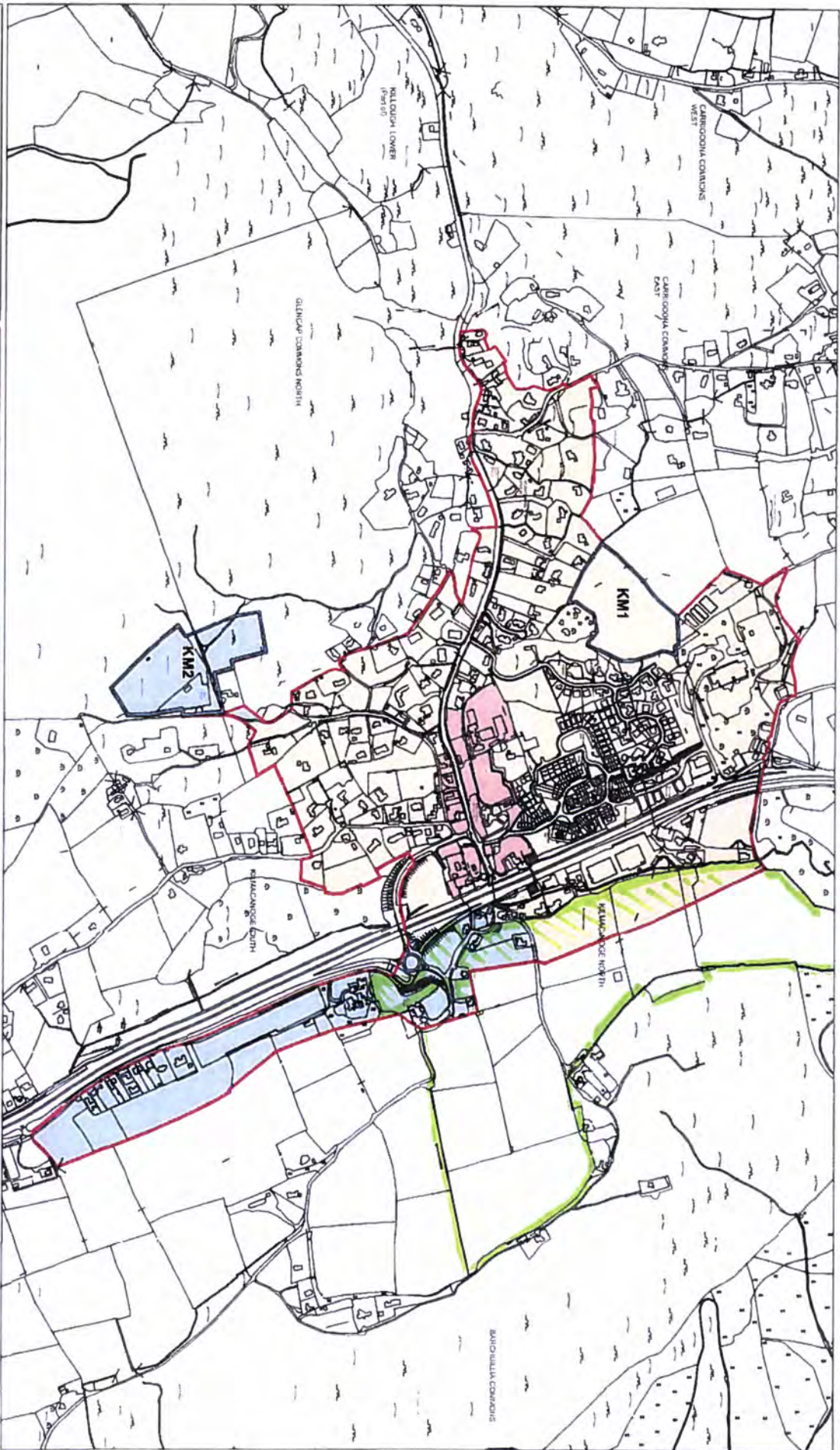


LAW SOCIETY  
OF IRELAND  
PRACTISING  
SOLICITORS

Telephone: 01 2746700 / 01 2746701 / 01 2746702 / 01 2746703.  
Fax: 01 2021709 DX: 16009 Bray Email: info@cullentyrrell.ie Web: www.cullentyrrell.ie







WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District**  
Local Area Plan  
2017

LAND USE ZONING MAP **DRAFT**

Title: Kilmacanogue  
Map No.: 4

-  Municipal District Boundary
-  Settlement Boundary
-  Primary Development Area
-  Secondary Development Area
-  Tertiary Development Area
-  Plan Objectives Boundary



Wicklow County Council  
Planning & Development  
MAPS ARE NOT TO SCALE

Design: Barry Kelly, 14/07/16  
Layout: Emma 28/11/16  
Checked: Emma 28/11/16

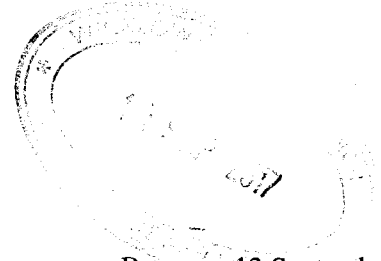


# Cullen Tyrrell & O'Beirne

C189

Solicitors  
Commissioners For Oaths  
No.3 Prince of Wales Terrace, Bray, Co. Wicklow, A98 Y286.

E.M. O'BEIRNE  
E. J. O'BEIRNE  
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N.D. MEGANNETY



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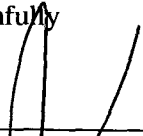
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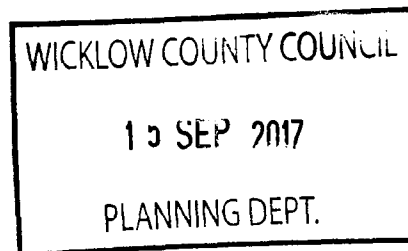
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Wicklow County Council  
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Station Road  
Wicklow

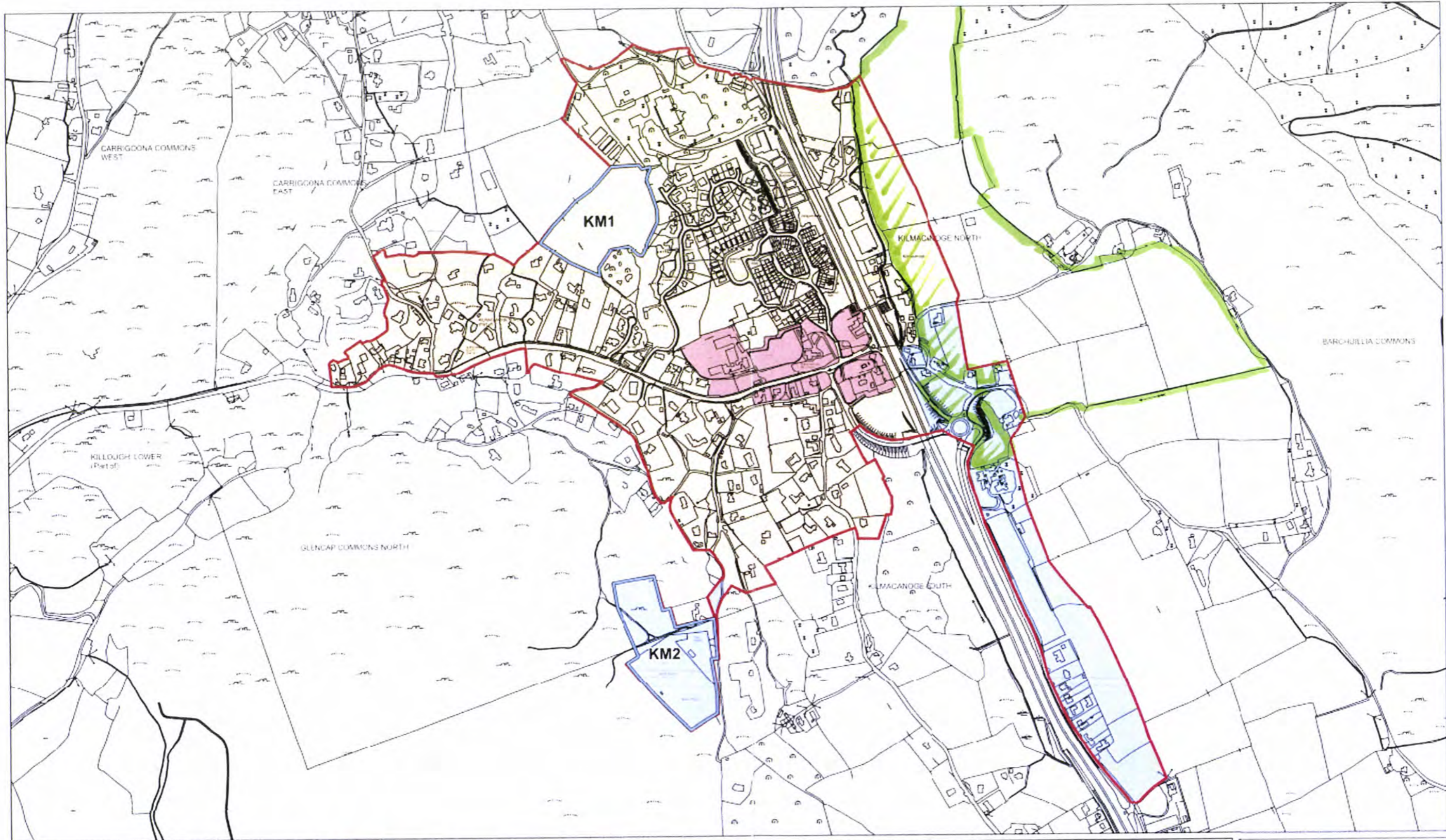


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WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District  
Local Area Plan  
2017**

LAND USE ZONING MAP **DRAFT**

Title: Kilmacanogue  
Map No. : 4

- |   |  |
|---|--|
|  Municipal District Boundary |  Primary Development Area   |
|  Settlement Boundary         |  Secondary Development Area |
|   |  Tertiary Development Area  |
|   |  Plan Objectives Boundary   |



Wicklow County Council  
Planning Department

Maps are not to scale

Distance Survey Ireland. All rights reserved.  
Licence Number 2017/35/COM/Wicklow County Council



Leonora Earls

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From: Gmcg [mailto:gmcg@wcc.wicklow.gov.ie]  
Sent: 15 September 2017 13:34  
To: Planning - Plan Review  
Subject: Planning Submission

Gerard Mc Glinchey  
Brookville  
Ballyman Road,  
Enniskerry,  
Co. Wicklow

15 September 2017

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

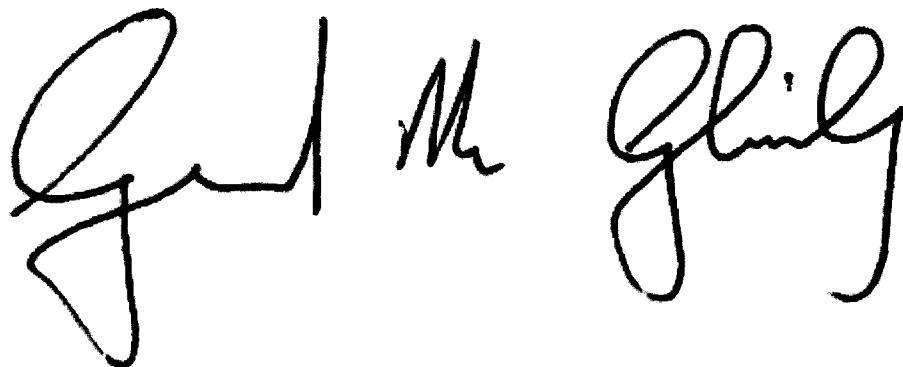
Dear Sir,

I note that submissions on the Bray Municipal District (affecting Bray town and environs, Enniskerry and Kilmacanogue) may be made until the 15th of September 2017

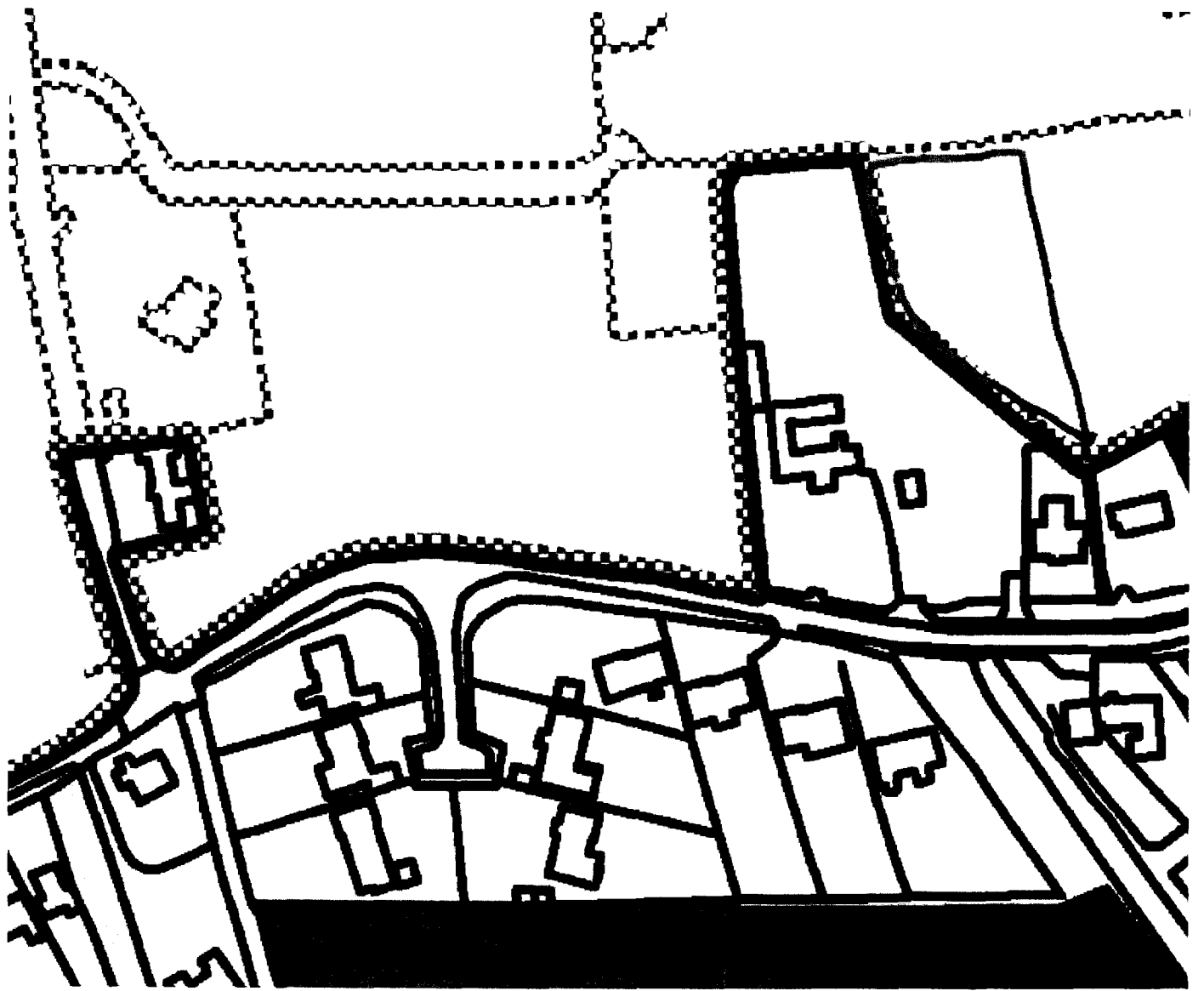
Brookville on 1.7 hectares is located within the village boundary of Enniskerry on mains sewer and water.

I request that the 0.2 hectares area indicated in the attached map in Green be considered for residential zoning in the Bray Municipal District Plan.

Sincerely

A handwritten signature in black ink, reading "Gerard Mc Glinchey". The signature is written in a cursive style with a large initial 'G' and a distinct 'Mc'.

Gerard Mc Glinchey



**Leonora Earls**

---

**From:** Enda Mc Hugh  
**Sent:** 14 September 2017 09:28  
**To:** Planning - Plan Review  
**Subject:** Submission of objection to the Draft LAP for Bray Municipal District  
**Attachments:** Submission 05.09.2017 (1).docx

Dear Wicklow County Council

Please find attached our objection wrt to the rezoning of land adjacent to Oldcourt House and Giltspur Wood as R20 "New Residential".

In the attached you will find

- Government Maps showing Flood plain
- Previous Planning drafts for the land

Thank you for you consideration to our objection to the rezoning on the Land outline in our attachment

Sincerely  
Carmel Temple,

Enda McHugh,

87 Giltspur Wood,  
Bray,  
Wicklow.

## Bray Municipal District Local Area Plan 2017

### Stage 2: Draft Local Area Plan Public Consultation

SUBMISSIONS ARE INVITED from everyone, regarding the draft LAP, before 5.00pm on 15<sup>th</sup> September 2017. Submissions may be made in one of the following ways:

1. Write to: Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.
2. Email to: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

### Submission by Enda Mc Hugh & Carmel Temple, 87 Giltspur Wood, Bray, A98 K857

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I bought my home in 2013. Before I purchased my home, I checked the **Bray Town Development Plan**, published in 2011, to see whether or not the field to the rear of my family home was to be developed in the future.

#### The current Plan

The Consolidated Land Use Map accompanying the Development Plan showed the area behind my home to be zoned OS4 [Solely Open Space], zoned to “preserve continuous open space along the river valley”. This area zoned OS4 also contained two Protected Structures, as shown in Figure 1.

The Plan stated at paragraph 9.4.5.4 under ‘OS4 Zoned Solely Open Space’ that *“it is the policy of the Council to preserve continuous open space along the Swan River Valley ensuring no negative impacts on the natural environment of the area. This zoning provides for the preservation of the open space along the river valley as well as the preservation of trees, consistent with maintaining the flood capacity of the stream.”*

The Plan additionally stated at paragraph 13.2.12 ‘Acceptability of Uses in the OS4: Solely Open Space Zone’ that Cemetery and Open Space would be permitted in principle, whilst the following uses would be not normally permitted but open for consideration

- Car Park
- Church
- Commercial Recreational Buildings
- Community Facility
- Cultural use
- Education
- Private Club
- Private Garage
- Recreational Facility/Sports Club

In its introduction, the Plan stated that it was set within the context of a twenty year planning horizon, and that the *“implementation of the Bray Development Plan will secure the future development of Bray and its environs in a sustainable and integrated manner. The Plan will provide a*



platform for the development of a healthy economy and environment, which in turn will create conditions for social progress and a better quality of life. These benefits will be realised in a manner that meets the requirements of the town's present population, while also safeguarding the physical, economic and social environment of the town for the enjoyment of future generations”.

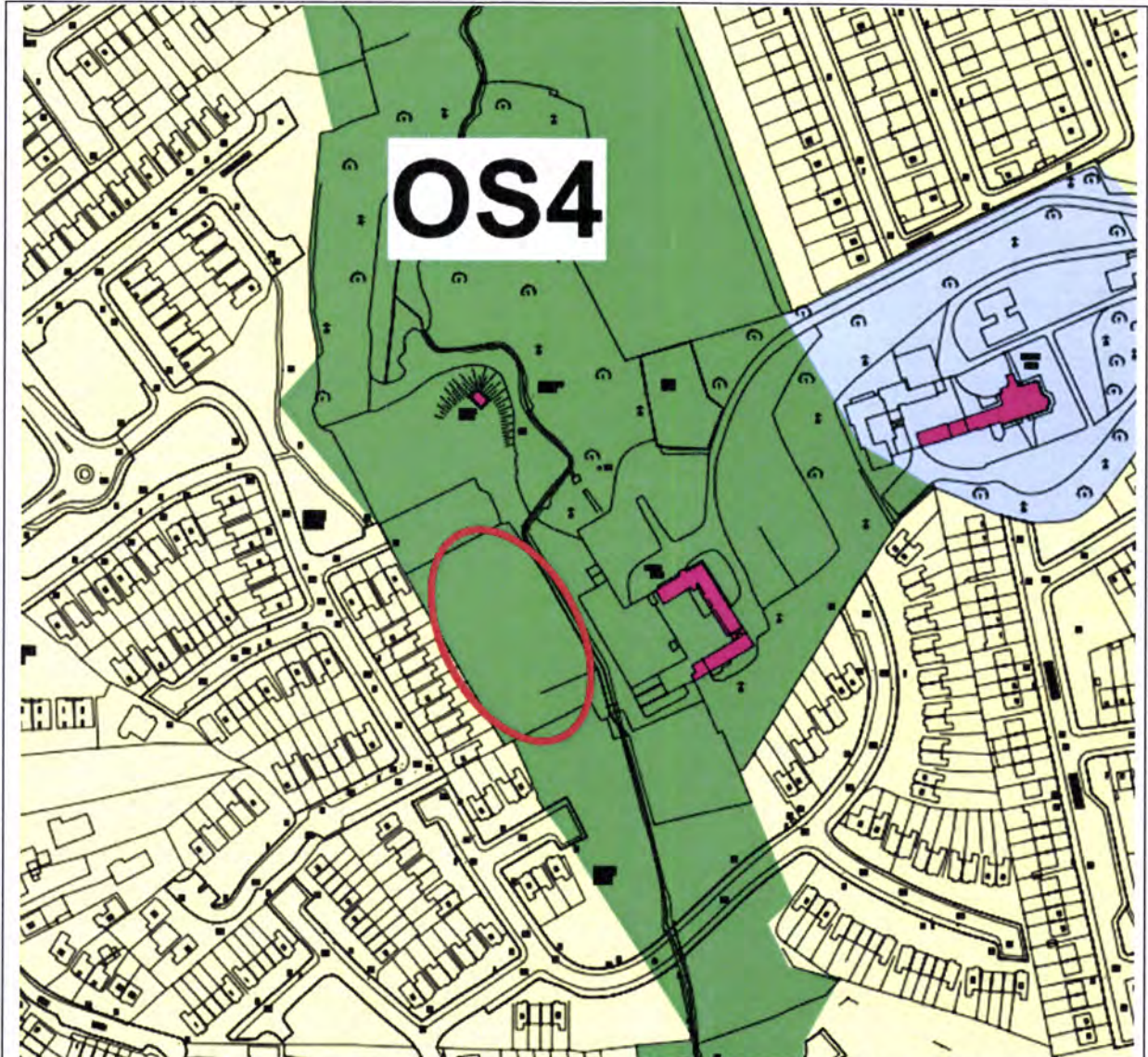


Figure 1: Extract from Bray Town Development Plan published in 2011, showing the field to the rear of my home zoned OS4 [Solely Open Space], circled in red.

I took comfort, from the level of detail provided in the Plan published in 2011, that future residential development needs of Bray Town were taken into account in the Plan preparation, and that this type of development would not occur in the field to the rear of my family home, given that it was zoned to ensure no negative impacts on the natural environment of the area; to provide for the preservation of the open space along the river valley; and the preservation of trees, consistent with maintaining the flood capacity of the stream.

I proceeded to purchase the property without the fear of this land being developed for residential housing in the future.



## The New Plan

I am now very anxious to read that the new **Bray Municipal District Local Area Plan 2017** seeks to re-zone this field as R20 'New Residential' as shown in Figure 2, to "protect, provide and improve residential amenities at a density up to 20 units/ha". The Plan states as Objective R2 that "new residential development shall be expected to aim for the highest density indicated for the lands".

I am horrified that this land has been re-zoned to facilitate for the provision of up to 30 new residential units on a site of 1.5ha (Table 3.1 of the draft Plan), whilst the remainder of the Oldcourt site remains zoned OS1 'Open Space'.



Figure 2: Extract from draft Bray Municipal District Local Area Plan 2017, showing the field to the rear of my home zoned R20 [New Residential], circled in red.

The OPW Fluvial Flooding map tool available on Myplan.ie shows that the Oldcourt River and surrounding land indicates that this re-zoned field is included within the 1 in 100 year flood zone and therefore floods, as can be seen in Figure 3.





The new Plan states at Section 2.2.10 that an assessment of flood risk in accordance with Government guidelines on *'The Planning System and Flood Risk Management'*, has been formally taken into account in the preparation of this plan. However, the guidelines states that their core objectives are, amongst other things, to:

- avoid inappropriate development in areas at risk of flooding;
- avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off; and
- ensure effective management of residual risks for development permitted in floodplains.

I submit that zoning land for up to 30 new homes in an area that floods is contrary to the objectives of Government guidance on managing flood risk.

I further submit that this R20 zoning is not well thought out as it is located alongside the adjacent OS1 zoning, the objective of which is to protect and enhance existing and provide for recreational open space; facilitate the further development and improvement of existing parks and casual play areas; to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities that would reduce the opportunities for use by the wider public.

How can the development of 30 new homes in part of a site at the same time restrict development or activities that would reduce the opportunities for use of the remainder of the site by the wider public?

These zonings conflict with each other, and the R20 zoning is at odds with the objectives of Government guidance on managing flood risk.

I would also have objection on Health and Safety ground:

- Construction Traffic going through a child friendly Cul de Sac
- The destruction of the Wild life Habitat

I would ask you to consider our submission and objection in the hope you would prevent the zoning of the land

Sincerely,

Enda McHugh,

Carmel Temple

**Leonora Earls**

---

**From:** Corinne Padilla Mc Loughlin ;  
**Sent:** 04 September 2017 11:24  
**To:** Kevin McLoughlin  
**Cc:** Planning - Plan Review; 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:** Objection to Local area plan in Bray Southern Cross

Administrative Officer,

Planning Section,  
Wicklow Country Council

To the Administrative Officer,

And to the Councillors of Wicklow Council,

I am writing to submit my objection to the proposed development in the area as outlined in the Draft Bray Municipal Local Area Plan 2017. I will quote extensively below from the letter already sent by my husband, Kevin Mc Loughlin, as he has set forth the points succinctly:

The main points as I see them are:

- (1) significant environmental impact to the entire area
- (2) negative effect to the quality of life of residents - more traffic (the effect of which cannot be overemphasised)
- (3) endangerment of the green belt zone
- (4) compromising groundwater in the area
- (5) increased traffic load, and the combined effect of destruction of agricultural/rural land, construction of more residential areas, addition of more industrial/commercial units, will press upon the limited resources of the area.

I strongly feel that the entire area (south Bray) needs to be developed with an extremely wise outlook. The proposed development as it currently stands seems to lack the full foresight that is needed for long-term sustainability.

I therefore oppose the proposed developments.

Sincerely,

Corinne Padilla Mc Loughlin

103 Deepdales,

Southern Cross Road, Bray

Telephone:

From Kevin Mc Loughlin's letter:

*"I am writing to submit my objection to the development proposed in the area adjoining the Kilruddery Estate as outlined in the Draft Bray Municipal Local Area Plan 2017; specifically, the proposed R20 New Residential and E Special Employment zones as outlined on Map 2 of the plan.*

*I believe that such developments would have significant environmental impact and would also negatively affect the quality of life of the existing residents of this area.*

*These areas are currently part of a green belt zone and as such are of tremendous environmental importance given their proximity to Bray Head which is a Special Area of Conservation (SAC), and which is currently listed under the EU Habitats Directive.*

*I note that in Appendix II of the 2009-2015 LAP it is stated that ground water vulnerability at the Kilruddery site "varies from Moderate to High to Extreme moving from east to west through the Kilruddery site" (p. 14). It is likely that this proposed development would further compromise the groundwater in this area.*

*The proposed development would also impact on a local walkway of stunning natural beauty which is used by locals to enjoy what is left of their natural world in the Bray Area and its development would constitute an irreversible and undesirable fundamental shift for residents in the area.*

*The introduction of more houses, destruction of rural/agricultural space for suburban green areas and introduction of industrial or commercial warehouse type units will significantly detract from the area, increasing traffic overload on the Southern Cross Road and further pressing upon the limited resources of the existing community.*

*I therefore oppose the proposed development.*

*Sincerely,*

*Kevin Mc Loughlin*

*103 Deepdales  
Southern Cross Road*

*Bray*

*Tel: 01853 811111*

***Reference***

***APPENDIX II: NON-TECHNICAL SUMMARY OF THE ENVIRONMENTAL REPORT OF THE BRAY ENVIRONS LOCAL AREA PLAN 2009-2015 (link [here](#))"***



**Leonora Earls**

---

**From:** Kevin McLoughlin  
**Sent:** 01 September 2017 13:24  
**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 Local Area Plan

Administrative Officer,  
Planning Section,  
Wicklow Country Council

To whom it may concern:

I am writing to submit my objection to the development proposed in the area adjoining the Kilruddery Estate as outlined in the Draft Bray Municipal Local Area Plan 2017; specifically, the proposed R20 New Residential and E Special Employment zones as outlined on Map 2 of the plan.

I believe that such developments would have significant environmental impact and would also negatively affect the quality of life of the existing residents of this area.

These areas are currently part of a green belt zone and as such are of tremendous environmental importance given their proximity to Bray Head which is a Special Area of Conservation (SAC), and which is currently listed under the EU Habitats Directive.

I note that in Appendix II of the 2009-2015 LAP it is stated that ground water vulnerability at the Kilruddery site "varies from Moderate to High to Extreme moving from east to west through the Kilruddery site" (p. 14). It is likely that this proposed development would further compromise the groundwater in this area.

The proposed development would also impact on a local walkway of stunning natural beauty which is used by locals to enjoy what is left of their natural world in the Bray Area and its development would constitute an irreversible and undesirable fundamental shift for residents in the area.

The introduction of more houses, destruction of rural/agricultural space for suburban green areas and introduction of industrial or commercial warehouse type units will significantly detract from the area, increasing traffic overload on the Southern Cross Road and further pressing upon the limited resources of the existing community.

I therefore oppose the proposed development.

Sincerely,

Kevin Mc Loughlin

103 Deepdales  
Southern Cross Road

Bray

Tel: . . . .

## **Reference**

APPENDIX II: NON-TECHNICAL SUMMARY OF THE ENVIRONMENTAL REPORT OF THE BRAY ENVIRONS LOCAL AREA PLAN 2009-2015 (link [here](#))

**Leonora Earls**

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**From:** liz mcmanus  
**Sent:** 17 August 2017 20:44  
**To:** Planning - Plan Review  
**Subject:** Draft Bray District Development Plan

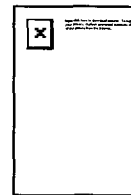
I wish to make a few points in relation to the Draft Development Plan for Bray.

- 1) The Plan looks very comprehensive and well thought-out.
- 2) I fully support the ongoing commitment to film-making at Ardmore Studios for the obvious benefit to the town.
- 3) I recommend a local area plan be drawn up for the derelict site on Castle Street that includes the old Heitons property to develop a mixed social/private housing and retail scheme. Such a development would balance the housing already on the other side of Castle Street in physical terms while adding a vital residential infill while dealing with a derelict eyesore..
- 4) I recommend a commitment to underground cabling whenever road/footpath improvements are planned. For example when the new cycle lane was being designed there was a real opportunity missed to get rid of unsightly overhead cables between the Hibernian Bar on the seafront and the Harbour while those improvements are being done.
- 5) I urge that *No* new car parking to be provided on the Seafront. .Instead a real effort using parking charges, signage and encouragement to be made to direct visitors' cars at the weekends away from the Seafront and into the existing carparks in the town.

I wish you well in your endeavours,  
Best

Liz McManus

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[Latest novel: A Shadow In The Yard](#)  
[Liz McManus on Facebook](#)

**Leonora Earls**

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**From:** Dairina McMichael  
**Sent:** 31 August 2017 15:54  
**To:** Planning - Plan Review  
**Subject:** Draft Bray Local Area Plan in relation to re-zoning of Killruddery Estate

Dear Sir/Madam,

I am writing to object to the proposed re-zoning of land for 240 new residential units in the Killruddery Estate.

I am concerned that the local area will be very badly affected for the following reasons.

The Killruddery Estate is a scenic area and one of the main tourist attractions in Bray. With the building of these houses the natural beauty of the area will be greatly diminished and there will also be a greater risk of flooding. The gardens in Hollybrook are often flooded and adding more housing pressure will exacerbate the flooding problem even further.

I have lived in Swanbrook since 1997 and there is still no sign of the promised retail units and facilities, making it a necessity to have a car just to get some messages. With no proper bus service this does not help matters.

The Southern Cross road is one of the busiest routes in and out of Bray. In the morning rush hour it is very difficult to get out of the estate and likewise, gaining access in the evening also proves very difficult. More houses will lead to more cars on an already overstretched road that lacks basic infrastructure and bus services.

The proposed entrance to these new houses is the main gate of Killruddery however, I assume that if this new estate is finished the main entrance will be moved to between Swanbrook and Earlscroft estates, making traffic even worse and making it more difficult and dangerous for children to play outside.

With additional houses and no infrastructure in place the potential for anti-social behaviour will increase.

I hope that you will take my objections and concerns into account when you are considering this planning proposal.

Yours faithfully,

Dairina McMichael

**Leonora Earls**

---

**From:** Cliona Ryan [i]  
**Sent:** 14 September 2017 17:26  
**To:** Planning - Plan Review  
**Subject:** Submission to Draft Bray Municipal District LAP 2017 - 2023  
**Attachments:** T&V McMullan\_Draft Bray MD LAP\_Sept 2017.pdf

Dear Wicklow County Council,

Please find attached submission to the Draft LAP for the Bray Municipal District.

Please acknowledge receipt of submission.

Regards and thanks,

**Cliona Ryan**  
**Tel:**  
**Mob:**

---

**Confidentiality**

**Notice**

**and**

**Disclaimer**

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The contents of this e-mail and any attachments thereto are the property of the sender and are intended for the named addressee only. The content of this e-mail may be confidential and/or commercially sensitive. If you have received this e-mail in error, please do not copy it or forward it to anyone, please immediately destroy it and kindly notify the sender. Property Resource Planning Management & Development Ltd. are not be liable for any alterations to this electronic message by any third party.

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

70 Glengarriff Parade  
Phibsborough  
Dublin 7

Electronic submission | ie  
Our Ref. 00.14.2017

13<sup>th</sup> September 2017

**RE: DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023**

Dear Wicklow County Council,

We make this submission on behalf of Thomas & Valerie McMullan of Killarney Glen, Bray, Co. Wicklow in relation to the above Draft Local Area Plan (LAP).

**Purpose of Draft LAP**

The Bray Municipal District LAP is to replace the existing Bray Plans (Town Development Plan 2011 – 2017, Environs LAP 2009 – 2015 (extended)) and those for Enniskerry and Kilmacanogue whose development strategy is currently set down in the County Plan 2016 – 2022. The houses on Killarney Glen are within the Bray Town Plan area.

We understand that the Draft LAP is to operate in parallel with the County Plan.

**Purpose of Submission**

The McMullan's family home is on Killarney Glen on the southern bank of the River Dargle. The private open space associated with their detached home is located to the rear (north) of their house and has already been subject to reduction following the CPO of lands to facilitate the River Dargle Flood Defence Scheme under An Bord Pleanála Order PL39.CH3122.

It has come to the attention of the family that the Draft LAP indicates and OS1 "Open Space" land use zoning along the banks of the River Dargle at their rear garden area. These lands are currently zoned RE1 in common with the houses. This draft open space land use zoning also appears on map no. G11 *Green Infrastructure* as part of a "Green Corridor" and on Map no. T01 *Road Transport Objectives Map* as a "Green Route" (R09). They have long understood the importance of keeping the riverbank free from new development for reason of the requirement for riparian strips and the susceptibility of the area to flooding. This freedom from development is compatible with the use of the lands as the family's private open space.

A review of the written statement gives further information on this area. It is an objective for The River Dargle at section 7.4 of the Draft LAP that *"To promote the use of the Dargle riverbank, between Bray Harbour and 'La Vallee' as a leisure and natural amenity area, through the development of a Dargle River Walk along the south bank of the river."*

This 'Walk' will pass by the McMullan's and neighbours' homes private open spaces to which they strongly object for reason of contravention of extant Town Plan policy and objectives; further, significant and unacceptable diminution of their existing residential amenity; and the physical impracticability of such a proposal.

## Bray Town Plan 2011 - 2017

The current Plan indicates a link between the harbour and the N11 along the River Dargle denoted as "*Proposed Pedestrian Circulation*". When this current Plan was prepared it was accompanied by a Strategic Flood Risk Assessment (SFRA) that incorporated the River Dargle Flood Defence Scheme approved in 2008, the works for which have been carried out from 2010 into this year.

As part of that Scheme the riverbank margins of the private garden area of the McMullan's and their neighbours' homes were compulsorily purchased. The works to be undertaken were flood defence barrier works and not a public walkway which will itself be required to be subject to Part VIII approval.

The McMullan and neighbours' homes remain in an identified flood risk zone as site no. B2(f) subject to a justification test in the SFRA at Appendix C of the Draft LAP. In the SFRA the homes fail the justification test and are recommend for minor development (e.g. extensions) only on the basis that the buildings pre-exist. It is for this identified flood risk that the flood defence walls have been installed along the riverbank at this location.

The current Town Plan at Section 9.4.1 concerned with Recreation & Open Space for the River Dargle states:

"The Council aims to facilitate the appropriate development of the area so that the full potential of the area can be utilised to the benefit of the town's economic, recreational and natural environment.

It is the policy of the Council to encourage the provision of pedestrian and cycle access along the Dargle Riverbank, while protecting the residential amenity of adjoining properties. The Council will reserve lands free from development to facilitate such access.

A Dargle River Walk Plan will be prepared and implemented by the Council, in conjunction with all relevant authorities, interest groups and members of the public. This plan will include relevant measures that relate to the development of the walkway. This Plan will include provision for matters relating to conservation, developing amenity/recreational potential, funding, management, maintenance, security etc. In particular, the Plan will include appropriate measures to ensure that existing residential amenity of residents in the vicinity of the proposed walkway is not impinged on. The Plan will seek to develop a neighbourhood park and associated leisure and play facilities as part of the Dargle River Walk."

[emphasis added]

We submit that the *Dargle River Walk Plan* committed to in the existing Town Plan has not been prepared and therefore the indication of a walkway to the rear of the McMullan and neighbouring homes via open space land use zoning and statement at section 7.4 of the Draft LAP materially contravenes the current Plan and is at least premature to the investigations and identified assessments that would be continued in such a *Walk Plan*. The indicated draft provision of a walkway on top of the flood defence works lands at Killarney Glen has not been subject to detailed design and not only contravenes the provisions of the current plan for that *Walk* but for reason of simple elevation will result in material overlooking of private gardens bringing a resultant complete loss of privacy and threat to security.

We submit that any walkway, to accord with the provisions of the current plan at Chapter 7 (particularly sections 7.4.6 and 7.4.12) will require a dual walking/cycling purpose. For such a walkway to be successful it must be perceived as safe and thus will be required to be lit imposing greater disamenity on the dwellings along the riverbank at Killarney Glen.

Chapter 7 of the current plan contains policy statements in relation to Cycling and Walking (7.4.6). In this regard the Plan sets down a set of criteria for such routes under the heading "*Pedestrian and cycle routes should present the following attributes to all users*". We submit that the proposed walkway for the above reasons does not meet four of the six criteria;

- the "*security*" of the homes along Killarney Glen will be unacceptably compromised;
- for want of detailed design and the implementation of the *River Dargle Walk Plan* there is a lack of "*coherence*";
- that the limited width available to the council to construct a pathway along will result is a lack of "*comfort*" for users; and
- will not meet width and lighting standards acceptable from a "*road safety*" perspective.



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### **Residential Amenity**

It is submitted that material overlooking and unacceptable loss of privacy for the private open space areas of the McMullan and neighbours' homes would naturally arise as a result of walkway installed at Killarney Glen. The McMullans are long term residents of the area with a young family fully engaged in community life. They support the further sustainable development of Bray, including provisions for infrastructure and improvement in access and safe pedestrian and cyclist movement throughout the town but believe that the proposed walkway objective at Killarney Glen is contrary to the principles of sustainable development for reason of the unacceptable loss of private residential amenity and for practical reasons that the pathway will be unimplementable.

### **Physical Constraints**

In deference to the current Bray Town Plan requirement for a *Dargle River Walk* at Killarney Glen to also accommodate cycling and having regard to the identified potential to flood we submit that the horizontal width of such a walkway will be well in excess of the extent of the lands in the ownership and control of the council along the River at this location having regard to in Design Manual for Urban Roads and Streets (DMURS), prepared jointly in 2013 by the then Departments of Transport, Tourism & Sport and Environment, Community & Local Government.

We submit that there is insufficient horizontal width to install a footpath of sufficient elevation to avoid flooding risk along the southern bank of the Dargle River at Killarney Glen. We submit that the insufficient width to install a footpath to at least the standards set down in DMURS is contrary to best practice and thus the proper planning and development of the area generally. Having regard to the riverside location of the proposed *Walk* where the river is recognised to have flooding risk it is submitted that such insufficient width is a material impediment to the installation of a safe walkway for pedestrians.

### **Conclusion**

The authority is requested to consider those matters they have identified at section 9.4.1 of the current Bray Town Plan as informing a *Dargle River Walk Plan* to be prepared over the period 2011 – 2017 and not undertaken. It is submitted that having regard to the very limited width of council controlled lands at the southern riverbank at Killarney Glen and their contiguous location with private open space that the council revise the envisaged *Walk* at this location. We submit that alternatives may be to continue from the park on the northern riverbank or indicate the *Walk* to access the public road pathway at Killarney Glen where pedestrians and cyclists are already accommodated in an attractive, safe environment lined with mature trees subject to Tree Preservation Order. The council is requested to revise the objective for the walkway along the southern bank of the Dargle River at Killarney Glen at section 7.4 of the Draft LAP accordingly.

Yours faithfully,

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Cliona Ryan  
Director

**Leonora Earls**

---

**From:** Joe McNally  
**Sent:** 01 September 2017 15:42  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan; Cllr. Michael O'Connor; Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. 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. 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 Municipal District Local Area Plan 2017 – Objection

Dear Sir/Madam,

My name is Joe McNally and I live in 68 Hollybrook Park on the Southern Cross Road in Bray.

I wish to voice my objection to the planned rezoning of lands in the Kilruddery Estate as detailed in the Bray Municipal District Local Area Plan 2017.

My objections are multifold and in no particular order:

1. The proposed area is a wonderful natural amenity where the people of Bray can go for walks and recreation in a safe and friendly environment. This would disappear if there were any new housing developments.
2. Any new housing development would damage the entire fabric of this area and the natural beauty of the small Sugar Loaf and surrounding area.
3. The area is already prone to flooding. The addition of more housing directly behind Hollybrook would only make this infinitely worse.
4. The infrastructure of the Southern Cross road area is already very poor.
  - a. There are chronic traffic congestion issues, particularly during peak hours but also in general. Any incidents on the N11 make the road totally gridlocked.
  - b. There are no amenities such as a shop, playground etc. along the road.
  - c. The public transport on the road is far below what is needed to service the current population living there.
  - d. There is a total lack of bins on the road.
  - e. The road itself is in poor upkeep, many of the road markings are almost worn away, for example.
5. Based on my above point (4), the addition of any housing is only going to make this far worse than it already is.
6. The Kilruddery Estate continues to develop into an ever more fantastic tourist attraction through its gardens and hosting of many events such as Hell and Back and the Groove festival. These events bring much needed revenues to the area. Events such as the recent children's Hell and Back event are run over the site of the proposed rezoned lands. Any housing development would destroy this.

I hope that you will consider my objection as I know from a recent residents meeting, there is strong opposition to the plan. This opposition is not just from residents of the Deepdales, Hollybrook Park, Swanbrook and Earlscroft estates but also from the councillors from the area and Minister Simon Harris and John Brady TD.

I have copied all of the Wicklow county councillors to this email in the hope that they can see that, while there is no doubt that new housing is a priority for the Bray area, the proposed location in the instance will

do nothing but forever damage a wonderful natural amenity to the detriment of not just the people of Bray and Wicklow but to the many thousands who come to the area.

I would appreciate if you could please acknowledge receipt of this mail.

Kind regards,

Joe.

**Leonora Earls**

---

**From:** Catherine Davy [ -  
**Sent:** 14 September 2017 16:49  
**To:** Planning - Plan Review  
**Subject:** Planning for new road Kilmacanogue

Hi I am leaving in Kilmacanogue on the Old Quill road I would like to strongly oppose this new road on the basis of its huge negative impact it would have on the area.

Catherine McStay

Sent from my iPhone

**Leonora Earls**

---

**From:** [REDACTED]  
**Sent:** 01 September 2017 13:00  
**To:** Planning - Plan Review  
**Subject:** Objection for the proposed Re-Zoning of a plot of land in grounds of Oldcourt House

Dell - Internal Use - Confidential

**To Wicklow County Council:**

I reside in 73 Giltspur Brook with my wife and 10 year old son and I own that property.

I am objecting to the proposed re-zoning of a plot of land in the grounds of Oldcourt House.

My objection is based on access to this site. I believe this access (TBD ) will effect the residents of Giltspur brook.

My main concerns are

- Increase in traffic through a residential area. Already there is high volume of traffic in the estate as each house now has 2-3 cars. This leads to lots of cars already parked on the road.
- You will have to drive through two estates to get the new one!! (Wheatfield/Giltspur Brook)
- The road in Giltspur Brook is small and tight and has trees either side, This is potentially very dangerous for our children,
- The entrance to Giltspur Brook is hazardous as residents actually park their cars on the corner
- If we have another exit then it makes our estate prone to getting unsavory characters using it as a short cut. So potential increase in crime

I trust my objections will be listened to

Many thanks  
Jim McVeigh

C200

**Bernadette Harvey**

---

**From:** Owen Melia  
**Sent:** 15 September 2017 20:26  
**To:** Planning - Plan Review  
**Subject:** Re: Bray/Wicklow Zoning

To the administrative officer, Planning Section,

My Details:

Owen Melia  
7 Deepdales

Southern Cross

Bray

With reference to the draft Bray Municipal District Local Area Plan 2017, I wish to raise the following concerns and observations.

The proposals to re-zone lands for residential and industrial needs at the base of the Little Sugar Loaf mountain is an excessive encroachment on an area of outstanding natural beauty (AONB).

The areas serviced by the Southern Cross Road lack the amenities to support further large housing developments. The area has already reached a residential saturation point. A large site on the north side of the road has remained vacant for substantial time and is a prime location for an outdoor mall / retail centre that could have an anchor client such as Dunnes Stores to add competition to other retailers in the town. Clothing outlets and cafés for example could also be accommodated here. I think some imagination could be applied to zoning this vacant site for Bray and Wicklow residents and for attracting people/business from outside the Wicklow region. The site could also be used for a public secular school to accommodate increased population.

The Wicklow and Bray draft proposals have not considered the large number of teenagers current and future. Amenities other than playing fields and playgrounds need to be publicly funded to engage young people in the community in a positive manner and to reduce loitering and the potential for non-engaged teens venturing into drugs, alcohol and crime etc.

Ultimately any future re-zoning and planning applications for the Southern Cross road area should compliment the outstanding views and natural amenities that exist in the area and amenities and infrastructure (e.g. sufficient road systems, water supply, drainage systems) should be in place before any further development takes place.

Please acknowledge receipt of this email.

Yours sincerely,

Owen Melia

C201

Wicklow County Council  
15 SEP 2017  
PLANNING DEPT.

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

**Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

1. Natural Amenity:

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

2. The Character of Kilruddery Demesne:

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

3. Flooding:

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.



4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed *David Maher*      *LINDA MONTAHAN*  
*David Maher*      *DAVID MONTAHAN*

Address *115 HOLLYBROOK PK*  
*SOUTHERN CROSS RD,*  
*BRAY*  
*CO. WICKLOW*

C202

**Leonora Earls**

---

**From:** Mark Mooney [i]  
**Sent:** 15 September 2017 17:14  
**To:** Planning - Plan Review  
**Cc:** 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:** Objection to the Rezoning of lands on the Kilruddery Estate on the Southern Cross Road  
**Attachments:** Rezoning of lands on the Kilruddery Estate.pdf

Hi Sir/Madame,

Please find below and attached my letter of Objection to the Rezoning of lands on the Kilruddery Estate on the Southern Cross Road

---

Mark Mooney and Family  
119 Hollybrook Park,  
Southern Cross Road,  
Bray,  
Co, Wicklow

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

Re: The Rezoning of lands on the Kilruddery Estate on the Southern Cross Road

Dear Sir/Madame

I write in connection with The Rezoning of lands on the Kilruddery Estate on the Southern Cross Road. I have examined the plans and I know the site well. I wish to object strongly to the Rezoning of this area.

The following points are the reasons for this objection .....

1. A number of houses in the Hollybrook area are prone to flooding and with the prospect of an additional 240 houses in this area would obviously increase the risk of flooding that already exists ,this would cause grave concern to those living in Hollybrook Park
2. With most of the estates being "Cul De Sac" estates, it has been suggested that a new entrance to the new housing area could go through HollyBrook Park or other estates and in turn increase the flow of cars going through estate and also eliminate Hollybrook from being a Cul De Sac estate
3. There is absolutely no public transport or infrastructure on the southern cross area already so how does this new rezoning/planning plan to accommodate the extra flow of cars and people from 240 houses and the industrial sites planned for the area, it must be noted that there are no litter bins that exist on the Southern Cross Road already , you would imagine that a small issue like this could be addressed before the above rezoning/planning plan is even considered

4. There is already a high level of traffic on the Southern Cross road so how difficult is it going to be to access the main road at busy times with an additional 300 plus cars trying to access the main road also.

The majority of the political parties from Bray have said they will be objecting to this rezoning of the lands and they have also said that they will be asking the colleagues on the Wicklow C.C. to also object, so myself and my family would like to add our voices to this objection and say NO to the rezoning of these lands.

Yours Faithfully,

Mark Mooney and Family

Thanks

Regards

Mark Mooney

Email: [mark.mooney@automaticplastics.com](mailto:mark.mooney@automaticplastics.com)

Web: [www.automaticplastics.com](http://www.automaticplastics.com)

Tel.: 01876 452222

Tel.: 01876 452223



Mark Mooney and Family  
119 Hollybrook Park,  
Southern Cross Road,  
Bray,  
Co, Wicklow

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

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Yours Faithfully,

Mark Mooney and Family

**Leonora Earls**

---

**From:** Esther Moore  
**Sent:** 14 September 2017 20:49  
**To:** Planning - Plan Review  
**Cc:** Cllr. Christopher Fox MCC; Cllr. Steven Matthews; Cllr. Oliver O'Brien; Cllr. Pat Vance MCC; Cllr. Brendan Thornhill; Cllr. Michael O'Connor; Cllr. Joe Behan; jryan@greatplacetowork.ie; Cllr. Tom Fortune MCC; Cllr. Nicola Lawless; Cllr. Grainne McLoughlin MCC; mitchelld@eircom.net; Cllr. Gerry Walsh; Cllr. Jennifer Whitmore; Gail Dunne; Cllr. Shay Cullen; Cllr. Mary Kavanagh; Cllr. Daire Nolan; Cllr. John Snell MCC; Cllr. Irene Winters MCC; Cllr. Edward Timmins MCC; Cllr. Jim Ruttle MCC; Gerry O'Neill; Cllr. Thomas Cullen MCC; Cllr. Vincent Blake MCC; Cllr. Miriam Murphy; Cllr. Mary McDonald; Cllr. Pat Kennedy; Cllr. Pat Fitzgerald MCC; Cllr. Sylvester Bourke MCC; Cllr. Tommy Annesley  
**Subject:** Objection to roadway and re-zoning Kilmacanogue, Co. Wicklow

To Wicklow County Council,

I object to the proposed roadway and re-zoning of lands on the lower slopes of Little Sugar in Kilmacanogue on the following grounds:

1. The proposal is contrary to the vision and goals as laid out in the Wicklow County Development Plan 2016-2022. This proposal would destroy what is deemed as an Area of Outstanding Natural Beauty (AONB).
2. In 2008 a ministerial order was made to grant a Special Amenity Area Order (SAAO) for the Great and Little Sugarloaf Mountains. This order was ignored and not implemented by Wicklow County Council. I request that an objective be included in the Bray Local Area Plan to create an SAAO for the Great and Little Sugarloaf Mountains.
3. The destruction of the green belt would ultimately lead to the subsuming of Kilmacanogue into the greater area of Bray. This I would be detrimental to the village distinction of Kilmacanogue. This is contrary to the vision and goals laid out in the WCDP.
4. The area proposed for re-zoning is an essential amenity, not just locally but the thousands of walking and trekking group visitors who use it throughout the year. This is again contrary to the vision and goals laid out in the WCDP.
5. The proposed roadway is superfluous to needs and It duplicates a proposal published in April 2017 by Transport Infrastructure Ireland to provide a "local service road" immediately alongside the N11 motorway at Kilmacanogue. The TII proposal is simple, sensible, and cost-effective, and it does not adversely impact the slopes of the Little Sugarloaf Mountain.

I believe this proposal reflects an extraordinary lapse of judgement on the part of Wicklow County Council, and must be removed in its entirety from both the Wicklow County Development Plan 2016-2022, and the Bray/ Kilmacanogue Local Area Plan 2017-2023.

Sincerely,

Esther Moore,

13 Rockfield Park,  
Kilmacanogue,  
Co. Wicklow.

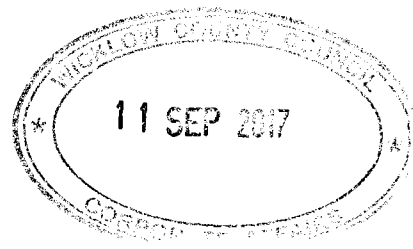
C204

13 Giltspur Wood  
Killarney Road  
Bray  
Co. Wicklow

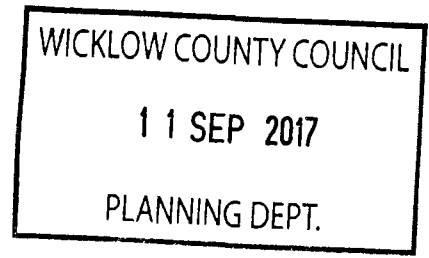
Ph: 087 2208495

8<sup>th</sup> September 2017

Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow



Re: **Rezoning of Lands at Old Court House**  
**BRAY MD LAP**



Dear Sirs,

As owners of 13 Giltspur Wood, Killarney Road, Bray, Co. Wicklow for the past 10 years we would like to submit our strong objection to the rezoning of lands at Old Court House, more particularly the lands to the south of the Swan River parallel to Giltspur Wood.

We have attached a coloured map of the lands in question and would state our concerns as follows:-

- 1. **FLOODING** – The proposed land to be rezoned is situated on the banks of the Swan River. We have attached your own Development Plan Flood Zones map which categorises the Swan River as “Flood Zone A High probability of Flooding”. The proximity of the proposed zoned lands to the Swan River is extremely close.


We also attach a printout of an Independent Newspaper article from 2009 reporting on the flooding of the Swan River at exactly the point where the rezoning is proposed.

- 2. **TRAFFIC** – Old Soldiers Road cannot cope with the level of traffic that exists at the moment. Indeed part of the road was made into a one way system in an effort to decrease traffic along this narrow road. The traffic that builds at the traffic lights with the junction of Killarney Road is already at extremely heavy levels and any additional traffic to this road would only add to this already out of control bottleneck situation.

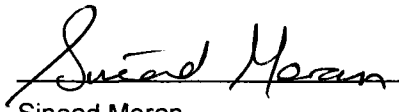


3. **SAFETY** – to break through an existing well established and safe cul de sac in the Giltspur Wood area would be an assault on each and every resident in the Giltspur Wood Estate. All of our children enjoy the safe and secluded environment that our unique Estate has to offer our children. Our children have been afforded the luxury of having the freedom of riding their bikes through our green areas. To take this away would be a massive injury to our small Estate and our children not to mention the disturbance and endangerment any construction vehicles would cause if access was granted through our Estate.
  
4. **OLD COURT CASTLE** – is a protected structure and as you will see from the maps enclosed, any development in this area would expose this Castle to potential vandalism, antisocial behaviour and possible irreparable damage.

Kind regards



Paul Moran



Sinead Moran

Paul & Sinead Moran  
13 Giltspur Wood  
Killarney Road  
Bray  
Co. Wicklow

087 2222125

bing maps

Notes





bing maps

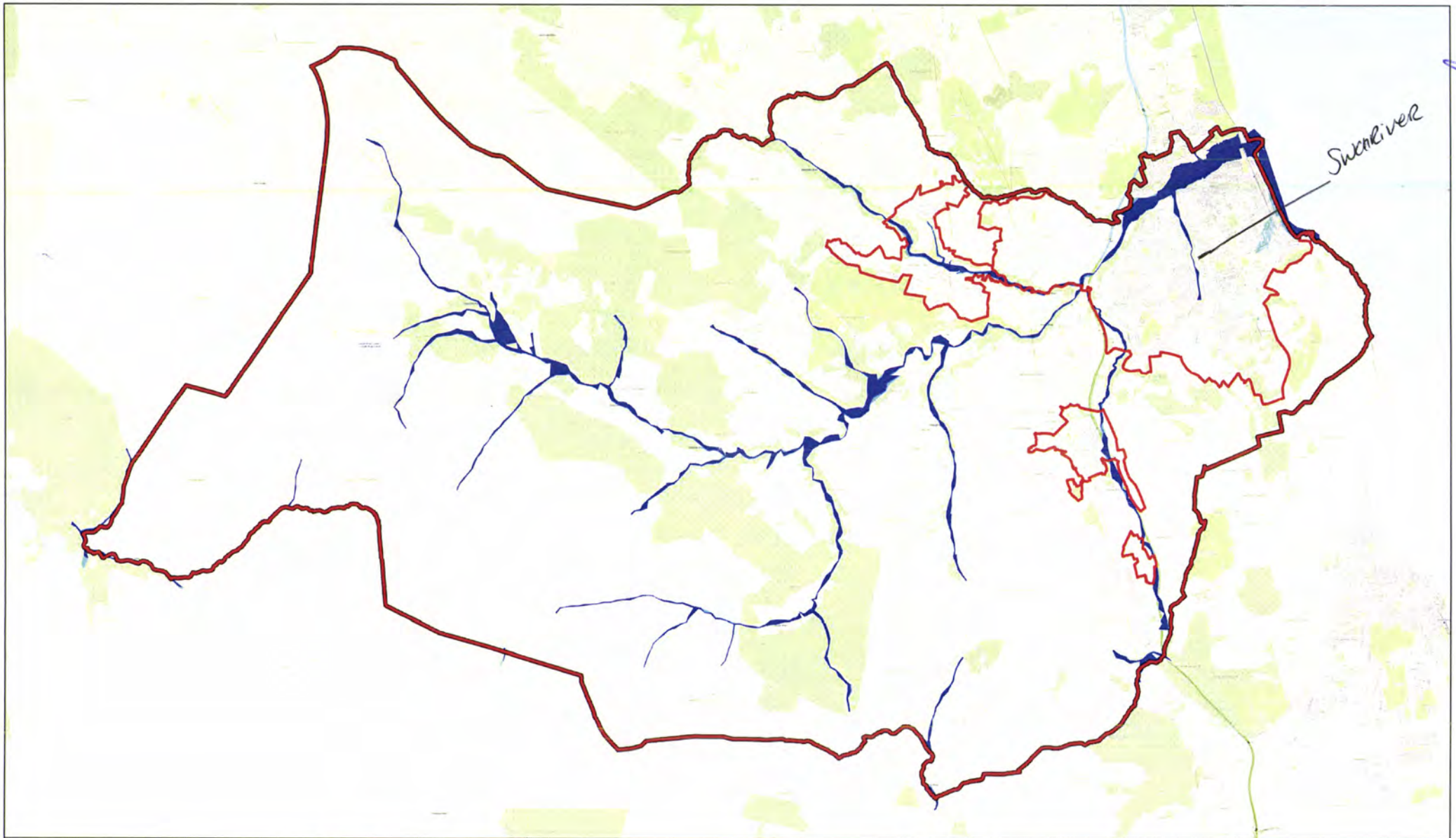
Notes

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





WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

**Bray Municipal District  
Local Area Plan  
2017**

STRATEGIC FLOOD RISK ASSESSMENT

Title: Indicative Flood Zones  
Map No. : SFRA1

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



**DISCLAIMER**

These Indicative Flood Zones were based on information available at the time of drafting and amending this plan. Any new data and analysis carried out after this date has not been integrated into this map but should be used in conjunction with this map for development proposals. All information may be substantially altered in light of future data and analysis.

FULL LAIMER IS INCLUDED IN SFRA



Wicklow County Council  
Planning Department

Maps are not to scale

Ordnance Survey Ireland. All rights reserved.  
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# Flood prevention plans are unveiled

## COUNCIL AIM TO AVOID REPEAT OF AUGUST DISASTER

Esther HAYDEN

March 18 2009 9:29 AM

- 
- Email

AFTER devastating flash-flooding in Bray on August 16 last year, engineers from Bray Town Council unveiled plans to prevent a similar occurrence for councillors at last week's meeting.

Sean O'Neill and Liam Bourke explained that a bottle-neck in the Swan River was one of the reasons why the water was so out of control that day.

They said that the river will need to be deepened and widened to help with the flow. This is just one of the measures that will be presented at council over the coming months as flooding was widespread across the town.

One of the worst areas hit was Mountainview Drive, as was Oldcourt. The engineers showed pictures of the effects of the flooding on Mountainview, Glen na Smole, Wheatfield and Oldcourt. They also presented some diagrams of foul and storm sewers and culverts in the area.

Mr. O'Neill said that there is a likelihood of the Swan river being unable to carry capacity regularly, for example every five to ten years.

Mr. Bourke said that it is essential to improve the channel between the Boghall and Wheatfield by nearly double. He said that initially trees would be removed from along the channel. They are actually growing in the river.

'August 16 will remain in the minds of the people forever,' said Cllr. John Brady. He asked if works on the Schering Plough lands had any impact on the Mountainview floods. Cllr. Pat Vance said that works there were carried out in accordance with planning permission.

X 'Even in the 1970s when there were less than 100 people on the Boghall there was flooding on the road,' said Cllr. John Byrne.

The people in Wheatfield are reasonable people. They will know that if their homes were threatened they would want to have it fixed,' commented the Cathaoirleach, Ciaran O'Brien.

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Promoted Links

by Taboola

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**5 Reasons to Switch your Irish Life & Mortgage Protection Insurance**

Ocean.ie

**Leonora Earls**

---

**From:** Lorna Mould ;  
**Sent:** 04 September 2017 17:26  
**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 Municipal District, Local Area Plan. Killruddery Estate rezoning proposal

**To Whom it May Concern**

I wish to lodge my **OBJECTION** to the proposal outlined in your LAP which outlines a rezoning of land for both residential and commercial use within Killruddery Estate, including the development of 240 housing units on the base of the Little Sugarloaf.

My objection is based on numerous concerns I have regarding the proposal;

**Infrastructure**

1. Southern Cross Road already stretched to capacity in terms of traffic volumes
2. Lack of proper infrastructure on Southern Cross Road - road markings, pedestrian lights, refuse bins, dog bins, cycle lanes
3. No decent public transport to either Dublin or within Bray town itself
4. Failure to already utilise the commercial space on the Southern Cross. Land owned by Nechouka.
5. Failure to utilise commercial space on the Boghall Road. Dell site and Schering Plough site. Derelict with antisocial behaviour!
6. Failure of council to maintain the current estates on the Southern Cross - maintaining green areas, signage, road markings, cleaning of drains etc

**Natural environment**

1. Building on a land where drainage is already extremely poor leading to flooding to houses at the back of Hollybrook. What will happen with the sewage / drainage for 240 houses if the land cannot cope already!
2. Building on a land that is used for farming, especially for commercial use, would be detrimental to the live-stock and sustainability in the long term of the farm. Better solutions can be found to provide support to the estate and in line with sustainable farming.

**Additional concerns**

1. Access to the new site could be amended at any time and come through the gated area of Earlscroft and Swanbrook already saturated with cars and very unsafe for families.
2. Proposed walkway through Hollybrook to commercial area leading to increase of cars and footfall into the estate and increase in antisocial behaviour

The lack of information provided publicly to those who will be affected regarding this rezoning has also lead to a huge mis-trust around the project and the overall intentions/motives.



I wish to have my concerns acknowledged and included in any discussions regarding the decision making process.

Yours sincerely

Lorna & Simon Mould  
61 Swanbrook, Southern Cross Road, Bray, Co. Wicklow.

**Leonora Earls**

---

**From:** Barry Hazel [mailto:barryhazel@gmail.com]  
**Sent:** 14 September 2017 13:56  
**To:** Planning - Planning and Development Secretariat  
**Subject:** BRAY MD LAP

**RE: Objection to proposed Zoning for Housing Development at Giltspur Wood, Bray, Co. Wicklow**

Dear Sir/Madam

I am writing to you, as a resident of Giltspur Wood, Killarney Road, Bray to object to the proposed development of lands behind Giltspur Wood, in the vicinity of Old Court Castle. The reasons for my objection are as follows:-

1. Giltspur Wood is at present a Cul de Sac development with a large proportion of young families. Given the size of the estate the volume of traffic is significant. It is a matter of huge concern to parents that a child will be hit by a car as there is always cars coming and going. The proposed new development at Old Court Castle would require opening the Cul de Sac to facilitate a road connecting into the new development. This road would worsen an already dangerous traffic situation, given the number of young children out playing on the green and on their bikes and scooters with their friends.
2. The Green space in Giltspur Wood is an amenity not just for the estate residents but many people from Soldiers Road and Old Court Park who make use of it, to walk dogs or bring their children in to play, kick a ball, cycle about. Introducing further housing will lead to a diminution of the green area, which is badly needed for the children living in the vicinity of the area – where will they play then?
3. The area around Old Court Castle is beside a river. This area is a designated Flood Plain. As is widely known insurance companies will not provide cover for flood damage to any house built within a close proximity to a river. It is a fact that no mortgage provider will offer a mortgage to any building that does not have flood insurance included in the buildings policy. Purchasers of these houses therefore, unless they are cash buyers, won't be able to get a mortgage to fund the purchase.
4. The Old Court Castle area has huge historical significance and the river right beside it has potential as a further amenity for the people of Bray and has been proposed as Waterway Walk.

I hope that you will take the above points into consideration when this matter comes before the next meeting of Councillors and comes to a vote.

Yours sincerely

**Dervla Mulcahy**

83 Giltspur Wood

Bray

**Leonora Earls**

---

**From:** Bláithín Murphy  
**Sent:** 12 September 2017 11:43  
**To:** Planning - Plan Review  
**Subject:** Submission to the Draft Bray Municipal District Local Area Plan 2017  
**Attachments:** Objection to the draft Bray Municipal District Local Area Plan 2017.docx; signatures from the 15 Hollybrook Park residents.pdf

Dear Wicklow County Council,

Attached please find an objection to the Draft Bray Municipal District Local Area Plan 2017 from 15 residents of Hollybrook Park, Bray, Co. Wicklow.

Bláithín Murphy.

## **Objection to the draft Bray Municipal District Local Area Plan 2017**

Having examined the map on page 61 of the draft Bray Municipal District Local Area Plan 2017 and read the written statement, we, the Hollybrook Park residents listed below, are very concerned about the planned zoning of Kilruddery Demesne West for New residential and New employment. Our concerns include:

- 1. Natural Amenity:** The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and also on visitors to the area.
- 2. The Character of Kilruddery demense:** Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.
- 3. Flooding:** In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the

Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

4. **Traffic:** As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Kilruddery demesne. We would hope that this zoning be omitted from the final plan for Bray urban area.

From the following Hollybrook Park Residents:

Michelle and Eric Ryan (129 Hollybrook Park)

Gillian and Ronan Brandon (120 Hollybrook Park)

Paul and Máirín Reynolds (107 Hollybrook Park)

Niall Downey and Máire Ní Mhidhigh (105 Hollybrook Park)

Bernie and Ian Nesbitt (108 Hollybrook Park)

Elizabeth and Billy Murphy (131 Hollybrook Park)

Siofra MacMaolan (125 Hollybrook Park)

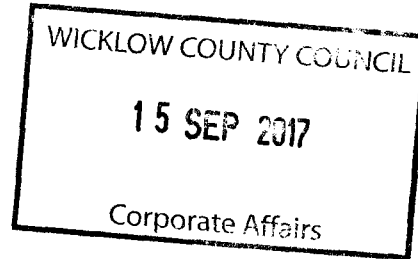
Ken and Bláithín Murphy (98 Hollybrook Park)

Signatures from the residents listed above can be found on page 3.

Eric Ryan Michelle Ryan.  
Mall Downey M. M. Whidhif  
Bernie Nesbitt  
Ian Nesbitt  
Albie Brada  
RODAN BRANDON  
Yavin Reynolds.  
Paul Ryan  
Kenneth Murphy  
Stella Murphy  
Elizabeth Murphy  
Billy Murphy  
Eva MacMaster

12/09/17 These are the signatures of the residents in  
Hollybrook Park listed in the objection to  
the Draft Bray Municipal District Local  
Area Plan 2017 above on page 2. Stella Murphy





Ciara Murphy  
 33 Giltspur Wood  
 Bray  
 Co Wicklow  
 13/09/2017

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



Ref: BRAY MD LAP

Dear Administrative Officer,

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

**1. Health and Safety**

To gain access to the field would require breaking through an existing safe and child friendly cul de sac which has been part of the estate for over 20 years. Construction traffic would be severely hazardous for the children and residents of the estate.

**2. Traffic Congestion**

Since you have made recent changes to the direction of traffic in the area, making the Old Soldiers Road a one way system plus having a new housing development 'Castlelynn' the traffic has become hectic. From a personal experience since the changes on Old Soldiers Road it took over 30 minutes to get from Giltspur Wood to St Fergal's School on the Boghall Road, a 10 minute walk at most. The congestion is caused by the one way system on Old Soldiers Road and the new traffic signals on the Boghall. Further development of the land would cause even more traffic delays, delays and dangers.

**3. Flood Risk**

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

**4. 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'.

**5. Wildlife**

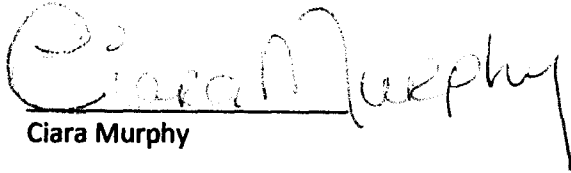
The proposed rezoned field and the surrounding land supports a rich and diverse set wildlife.

**6. Protected Structures**

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

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

Sincerely,

A handwritten signature in black ink that reads "Ciara Murphy". The signature is written in a cursive style with a large initial "C".

Ciara Murphy

**Leonora Earls**

---

**From:** Dervla murphy  
**Sent:** 15 September 2011 00.30  
**To:** Cllr. Irene Winters MCC; Cllr. John Snell MCC; Cllr. Daire Nolan; Cllr. Mary Kavanagh; Cllr. Shay Cullen; Gail Dunne; Cllr. Jennifer Whitmore; Cllr. Gerry Walsh; mitchelld@eircom.net; Cllr. Grainne McLoughlin MCC; Cllr. Nicola Lawless; Cllr. Tom Fortune MCC; Cllr. Pat Vance MCC; Planning - Plan Review  
**Subject:** Slow down! THINK PLANS THROUGH!

Please don't ride roughshod thru this delicate valuable area: Yes housing is Essential! So is environment, access and quality of life for locals n critters for hundreds-of-years-to-come. Give this process time.  
Dervla.

Leonora Earls

---

**From:** Etain Murphy [  
**Sent:** 15 September 2017 01:03  
**To:** Planning - Plan Review  
**Subject:** Bray MD LAP  
**Attachments:** avoca trees10001.pdf; avoca trees10002.pdf

Hillside,  
Bohilla Lane,  
Kilmacanogue,  
Bray,  
Co Wicklow,  
A98 HC89

Emails: \_\_\_\_\_

14<sup>th</sup> September 2017

The Administrative Officer,  
Planning Dept.,  
Wicklow County Council,  
Station Rd.,  
Wicklow Town.

## **The Bray Municipal District LAP 2017-2023**

Dear Sir/Madam,

Further to our earlier posted submission, dated 6<sup>th</sup> September, we should like to make the further following submissions, suggestions and comments about the draft plan. This is a separate submission, and has to be emailed because of the dead-line.

### ***Preservation order on trees***

Ireland, with the Netherlands, at 11%, are the two least forested countries in Europe, so anything we can do to protect our remaining trees is crucial.

Anyone who knows Kilmacanogue knows that it lies in a wooded valley, and that there are wonderful trees everywhere – the ones that particularly spring to mind are those at Avoca Handweavers, those around the church, those along the road to Kilmurray Cottages and the group of Scots Pines on the Little Sugar Loaf side that you see as you drive across the motorway bridge. Now if we look at the Kilmacanogue Settlement Plan, only **one** tree is identified as having a preservation order on it. It stands in the area KM1, where it is proposed to build 25 new houses.

There is a leaflet available at Avoca Handweavers (attached to this email as additional information) which tells the history of the original house on the site, Glencormac House, (now gone) and its gardens. The leaflet lists the rare specimen trees there, among which is a Monterey Cypress, *the only mature specimen in the world of this tree*, and which has been described as 'one of the outstanding trees of the British Isles'.

The Eucalyptus Dalrympleana is *the largest recorded in the British Isles*.

There is *an ancient avenue of 13 Yew trees – 12 are estimated to be about 800 years old and the 13<sup>th</sup> an amazing 2000 years old*, thought to be part of an old avenue leading to Hollybrook Abbey, long gone, which may have been a rest house for pilgrims walking to or from Glendalough.

Then there are 3 extremely rare pine trees, the pinus palustris, one of which is *the tallest in the British Isles*. And so it goes on.

This is obviously an extraordinary and unique collection of trees and, as such, deserves the highest protection.

We would like to make a submission that an expert in trees, possibly chosen by someone like Dr Matthew Jebb, director of the National Botanic Gardens, should examine the Gardens and decide which should have preservation orders placed on them. We think there are other fine trees (such as those mentioned at the beginning of my submission) in Kilmacanogue, possibly originally part of the same estate, and the same expert's opinion could be sought on these.

### ***A new village centre***

On Tuesday night, we attended a packed public meeting in Pluck's, Kilmacanogue. We found the experience very interesting: there is obviously a real ground swell in the village. There is almost universal opposition to the new route proposed – 'the service access road' – to the east of the N11, about which we wrote in our earlier submission, dated 6<sup>th</sup> September.

Also, people are yearning for the village heart that they feel was taken from them, when the N11 sliced Kilmacanogue into two sections. What's gone is gone, but we must make sure that anything done in the future tries to repair or at least mitigate the damage done at that time.

There is now no 'heart' to the village. There are no local shops - the only places in the village to buy a newspaper, milk or bread are the two service stations. The Post Office was closed down recently – the only place in Kilmac to see posters about local events. Now, over 1000 people have to drive to Greystones or Bray to buy a stamp to post a letter. The obvious place for a village centre is the area around the 1916 memorial garden. We propose that a few local shops and possibly a community centre could be built here and land vacant at present here, such as the field between the west end of the bridge and the

memorial garden, should be earmarked *for this purpose only*. The village also needs its Post Office to be reinstated.

### ***Walkway to Bray***

At the meeting referred to above, it was proposed that a walking/cycling/horse-riding route/greenway be established along the winding course of the Kilmacanogue river. This would provide a safe route for people to cycle to work or attend school in Bray, and also would be a fantastic local amenity for all. Walkers could walk in safety all the way from Bray to the top of both Sugar Loaf mountains, which would be a great tourism initiative. We believe this is an imaginative and exciting suggestion, and would support it wholeheartedly.

### ***Special Amenity Area Orders (SAAOs)***

We propose that both Sugar Loaf mountains have an SAAO placed on them. They certainly fulfil the criteria: they are areas of outstanding beauty and have special recreational value. So far, the two Sugar Loaf mountains are unspoiled. As residents, we must regard ourselves as incredibly fortunate custodians of this whole area; we should protect our unspoiled countryside, and hand it safely onto succeeding generations to enjoy. If the mountains were given SAAOs, they would be safer.

Gerald Manley Hopkins in his poem, *Inversaid*, could not have put our feelings better:

*What would the world be, once bereft  
Of wet and wildness? Let them be left,  
O let them be left.*

Yours faithfully,  
Raymond and Etain Murphy

Contact details:  
Raymond and Etain Murphy,  
Hillside,  
Bohilla Lane,  
Kilmacanogue,  
Bray,  
Co Wicklow,  
A98 HC89

Emails: [raymond@kilmacanogue.com](mailto:raymond@kilmacanogue.com)  
[etain@kilmacanogue.com](mailto:etain@kilmacanogue.com)

The Yew Walk is an avenue of 13 Yews (*Taxus Baccata*). We understand that the first 12 of these Yews are approximately 800 years old and the last one on the right hand side appears to be approximately 2,000 years old. We are advised that they formed part of an old avenue leading to Hollybrook Abbey - a building of which there are records but are now no traces. It has been suggested to us recently that the building was probably a rest house for people who were walking to and from Glendalough. We assume that some 800 years ago the Monks, knowing that one tree was very old, planted the remainder to create this avenue. Undoubtedly these trees are some of the most important in Ireland. The Yew is the longest living tree in Europe - some in English church yards are over 3,000 years old. It is not possible to accurately date the big ones because the centres of them become hollow. Yew is one of the strongest and most durable of timbers and was the wood from which bows were made.

Having gone down the Yew Walk turn left back towards the shop. On your left is a very large *Quercus petraea* Robur - the Sessile Oak which variety is a much finer tree than the common Oak - *Quercus robur*. On the right are a couple of fine Blue Atlas Cedars while on the left is our third Walnut tree. Also on the left hand side and divided by a large Beech tree are three extremely rare Pine trees - these are *Pinus palustris* - the Long Leaf Pine. Introduced to the British Isles in 1727 they are tender and very scarce. Alan Mitchell knows of 10 specimens in the British Isles and that our own three were planted in 1921. The tallest of ours is the biggest in the British Isles. This Pine tree is native to an area where annual grass fires are a feature - something which obviously presents a problem for a sapling. The trees response is to accept for the first five years or so of its life that it will be burnt off each year. In its sixth year of thereabouts, in the Spring, it grows to five or six feet very rapidly and thereby hopefully gets its growing bud above the anticipated grass fires. Walking towards the shop on the right hand side is another very remarkable tree - this is *Cupressus macrocarpa pendula* - the weeping Monterey Cypress. This very special tree dates from 1881 and is referred to by Alan Mitchell as 'The Glencormac Special'. In a report to the Wicklow County Council in 1977 Richard Webb stated "this tree is possibly one of the outstanding trees of the British Isles". It is the only mature specimen of the tree in the world. Hilliers Nursery in Hampshire took buds from it in the 1960's and are selling stock under the name 'Glencormick' and stating that the original cultivar is here.

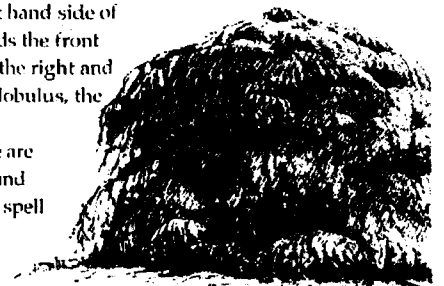
To the right of the Weeping Cypress is a group of *Picea smithiana* (Himalayan spruce). These trees are natives of the Western Himalays where they grow up to 250 feet high. A few of these trees have died over the past years as unfortunately they are very mature. Viewing again from the Weeping Cypress and to its left is a very large *Drinys winteri*, a native of South America found along the Andes. It was discovered by Captain William Winter who was sailing with Sir Francis Drake in 1578 and was used by him to spice meat and for strong anti-scorbutic properties. It is a plant so primitive that its wood lacks vessels and fibres so it is a soft wood like a conifer. It is covered in cream waxy flowers in May and June each year and is quite delightful. Slightly nearer the shop is a rare example of a Lawson cypress - *Pendula Vorn* - this is a weeping Lawson cypress. This tree was raised in Hess Nurseries near Hanover about 1890 and Alan Mitchell states that it is very scarce and he only knows of two others that are as big as this one, both are in Scotland. The last specimen tree to which we would draw your attention is the *Crimodendron patagua* round one side of which we have built our restaurant. This is a native of Chile and introduced to the British Isles in 1901. Alan Mitchell states that this tree is so rare this is the only free standing specimen recorded. It has grown extremely well - we have taken substantial sections off both the side the top of the tree in an attempt to balance it. This tree produces small white flowers in late Summer/early Autumn.

AVOCA HANDWEAVERS  
KILMACANOGUE, BRAY, CO. WICKLOW, IRELAND  
TEL: 01 286 7466 / 286 6295 FAX: 01 286 2367



In the early 1870's James Jameson, a member of the famous whiskey family, built a house at Glencormac on the site now occupied by our shop and factory. We know the exact location of the house because when building the shop we uncovered the spring which supplied water to the house and this now flows as a little stream from our shop through the garden towards our front entrance.

In respect of the history of the garden we are very lucky to have a copy of 'The Gardeners Chronicle' of April 1884 which names 'Mr. W. Sheppard, landscape gardener of Dundrum, County Dublin' as the creator of the garden. The Chronicle praises Mr. Sheppard on the layout and planting and a touch of irony is praise for maintaining the views of the Sugar Loaf Mountains which are now completely lost to us except from the avenue. Before the trees grew to their present considerable heights the house must have had stunning views of the mountains. The 1864 article mentions many of the trees which Sheppard planted and which are now mature specimens. Interestingly the article mentions the fact that the then recently planted trees were showing very rapid growth - a feature which has led to our now having several of the tallest specimens of particular trees in the British Isles including *Eucalyptus globulus*, *Pinus palustris* and *Eucalyptus dalrympleana*. It also has a sketch of 'The Dripping Pool', a very quaint typically Victorian garden feature, which you will discover on the right hand side of the avenue when you are walking away from our shop towards the front gate. About 100 metres from the shop you will find a path to the right and the Dripping Pool is hidden beneath some huge *Eucalyptus globulus*, the *Eucalyptus dalrympleana* and the Austrian Pines. Until, amazingly enough, we had a few dry summers in 1989/92 we are told that this Dripping Pool, which feeds from an underground source, had never dried up since it was built in 1878. The dry spell killed the mosses and ferns which were a feature of Victorian gardening and which were very pretty.





When the house was built the Jamesons owned some 80 acres of which 20 were laid out as pleasure grounds and gardens. On the side road where Avoca now has its offices a courtyard and stables were built and these were used to store grain and to supply fresh horses for the grain carts which served the original distillery in Dublin. The Jameson family owned the house until the mid 1950's, when it was converted into a hotel. In the early 1960's it was completely destroyed by fire. The various people who owned the property for the following 26 years allowed the gardens to deteriorate. Indeed, several of them tried to obtain planning permission to develop the lands for housing which would have resulted in most of the wonderful trees being cut down. Fortunately Wicklow County Council prevented such vandalism. Avoca Handweavers acquired the property in 1987 at which time the trees were smothered with ivy, Ash, willows, brambles and nettles had taken over the grounds completely. One result was the death of many of the smaller choice trees.

In the early 1960's Alan Mitchell, who is widely regarded as the leading expert on specimen trees of the British Isles, became aware of the existence of the garden here and has taken a great interest in it ever since though there was a time when he despaired of its future. He tells us that 'when I trespassed over the gate in 1980 the grounds were jungloid and I was resigned to it becoming impassable or covered with holiday chalets'. A great deal of the information about the trees has been given to us by Alan and we are greatly indebted to him. We are in the happy situation that when asked how do we know something about a particular tree we can simply say 'Alan Mitchell told us' and for those that know trees that is a complete answer.

## TOURING THE GARDEN

We suggest that a tour of the grounds should commence at the front door to our shop. One's eye is immediately caught by the *Thujaopsis dolabrata*. This tree has the damp spot it loves. The name 'dolabrata' comes from the silver white marking which are on the underside of the leaves which look like Roman trenching tools called dolabra. This tree was introduced to the British Isles from Japan in 1854. Behind the *Thujaopsis* are two fine *Sequoiadendron giganteum* the giant redwoods of California and which in the British Isles are often known as Wellingtonias after the Iron Duke, born in Co Meath. You will notice a third of these trees on the right hand side of our avenue. Sequoias are said to live for about 3,000 years, so these trees are only babies - the largest of ours at the moment is 47 metres (155 feet approximately). It is also said that the Sequoias never fall, although the tops are often destroyed by lightning. The spongy bark of our trees is used by badgers to clean their claws and one of the trees in front of the shop is obviously a favourite meeting point for these animals as there are always claw marks on it and signs of the soil being trodden. From the front door of the shop looking towards the second carpark you will see on the skyline the leaves of the *Eucalyptus niphophila* - the Snow Gum. This is one of the most attractive of the *Eucalyptus* trees, Beside the Snow Gum but invisible from the shop there is an *Ilex x altaclatensis* 'Hodginsii'. This is a fine specimen of a cultivar raised in a County Wicklow Nursery about 1810 and the tree is specifically referred to in the Gardeners Chronicle of 1884. To the right there is a stand of *Eucalyptus globulus* in front of which we have planted some *Acacia dealbata*. These *Eucalyptus* are commonly known as Blue Gums. They are natives of Tasmania and were introduced to the British Isles in 1853. In full health and suitable conditions they grow very quickly and are the tallest trees in most subtropical countries achieving a staggering growth of 250 feet in 60 years. They are very vulnerable to cold winds and in dry climates are often the subject of raging forest fires because of the high oil content. In front of these Blue Gums is a large *Juglans regia* - a walnut tree and beside it a *Cedar atlantica glauca* - a Blue Atlas Cedar which has been damaged by storms.

If you now walk through the third carpark (parallel to the avenue) you will see the Dripping Pool in front of you. To the right you will see two *Pinus nigra* var. *Caramanica* - Crimean Pines. These trees are natives of Asia minor. They are rare trees in the Crimea from which they were introduced by a Russian Naturalist called Pallas in 1790. The other trees in this group are *Pinus nigra* var. *Nigra* which are the Black Pines of the Eastern Alps and the Balkans and were introduced to the British Isles in 1840.

At the Dripping Pool there is another Walnut tree and a couple of very large Blue Gums. Beyond the Dripping Pool is a little path which leads back to the avenue. On your left is a *Eucalyptus dalrympleana*. It is very like the Blue Gums but has finer leaves and small flowers in threes. This is the largest specimen of this tree recorded in the British Isles. This path leads to our avenue. At the junction between the path



and the avenue to the right hand side is a group of *Pinus nigra*-Corsican Pines. Anyone who has seen Corsican Pines in the central area of Corsica will know what wonderful trees these are in their native home.

On the other side of the avenue to the left is a further group of Blue Atlas Cedars and facing you there is another very large Blue Gum. Beside the Blue Gum and to its right is another variety of *Eucalyptus* - *Brookesiana* which has a twisted bark, a characteristic of many *Eucalyptus* trees - if you walk down the avenue towards our entrance you will see a multistemmed *Pinus pinaster* - the maritime pine which is a native of the Western Mediterranean. Beside this pine is a *Chamaecyparis nootkatensis* - the Nootka cypress. This shapely tree with hanging foliage which is turpentine scented is a native of South Eastern Alaska and North Western U.S.A. It was discovered in 1792 and introduced to the British Isles in 1851.

Behind this tree is a Stone Pine - *Pinus pinea*. This tree is a native of the Mediterranean, has an umbrella crown and bears large globular pale creamy brown cones with large seeds which are ground into flour in Italy. Looking towards our front gate and beside the main road will be seen another fine stand of Atlas Cedars. At this point we suggest you turn left and immediately in front of you will be seen the famous Yew Walk with a poor example of a Sitka Spruce to your right. Our Sitka Spruce - *Picea sitchensis* is growing very slowly as the soil is too light and dry but this variety which is a native of the coast and islands of Western Canada and the U.S.A. is now very well known to everyone as it is the commonest tree planted in forestry - it outgrows all others on poor, wet and high land. It is the world's tallest Spruce - one was found recently on Vancouver Island which is 312 feet tall.



Hillside,  
Bohilla Lane,  
Kilmacanogue,  
Bray,  
Co Wicklow,  
A98 HC89

6th Sep<sup>r</sup> 2017.

The Administrative Officer,  
Planning Dept.,  
Wicklow County Council,  
Station Rd.,  
Wicklow Town.



## **The Bray Municipal District LAP 2017-2023**

Dear Sir/Madam,

I should like to make the following submissions, objections, suggestions and comments about the draft plan.

### **Submission that the following trees should be protected:**

A group of about a dozen mature Scots pines as well as several mature beech trees on the slope overlooking the little roundabout on the Topaz side of the N11 at Kilmacanogue, to the east of the bridge over the N11.

This group of trees on the slope is a little oasis of natural beauty: it catches the eye and forms a lovely prospect from both the motorway and from the bridge across it. The trees are several hundred years old and support many other species, such as lichens, plants, insects and birds.

### **Objection to change of designation**

The slope on which these trees are growing and the field below have been changed – in the draft plan - from agricultural land to 'tertiary development'. There is a fundamental problem with this redesignation. If the area below the trees is to be developed, the trees would have to be felled because of their possible danger to the houses below. This removal of tree roots and vegetation from the slope would

destabilise the whole hillside, leading to the possibility of landslide and soil subsidence even in the best hands. (Cf the Kilbruck Township Landslide of Sept 2006, when an entire hillside flowed downwards across a 4-lane highway and railway line causing absolute devastation, after vegetation etc was removed for development. As a result, it was eventually decided that the site should be restored as near as possible to its original state – at a very high cost). Studies have shown that the more vegetation on a steep slope, the less likely it is to have movement of soil downwards, and the reverse is also true of course.

With climate change, land slippage will become even more likely, such as the Scalp Head landslide in Donegal recently due to torrential rain. I believe strongly that this slope and the field below it should not be interfered with, and therefore propose that it continues to be designated as agricultural land, instead of being redesignated as a tertiary development area.

### **Extremely dangerous exit at Junction 8**

As vehicles exit the Topaz garage to join the N11, they are competing with vehicles leaving the N11. I have had several near-misses at this dangerous junction, where cars have cut across in front of me or at the same time, as I attempt to leave the N11 at Junction 8. I suggest that this junction be made safer.

### **Areas and sites of geological and geomorphological interest : WCCDP 2010-16; Vol 2, Natural Heritage; Schedule 17.7 and Map 17.07**

According to the list and the map above, incredibly the Little Sugar Loaf is not listed. I submit that it should be included on the list and on the map as an area of geological and geomorphological interest.

In the Draft Bray MD LAP on page 41, it states that it is the Council's objective

*“to promote Kilmacanogue as the main service base for visitors to the Great Sugarloaf and preserve and improve walking routes between the town and the summit of the mountain”.*

I suggest that the words *“the Little Sugarloaf”* should be inserted into this objective. The Little Sugarloaf is an extremely popular climb, possibly gentler and certainly quicker than the Great, so is especially suitable for families with younger children, or for the less fit. It may not be as popular as the Great Sugarloaf, but interestingly it was the first mountain climbed by the young Chris Bonington.

**Objection to RO8, the proposed new route east of the Kilmacanogue interchange to serve lands and properties that currently are only accessed via the N11, and objection to redesignation of agricultural land alongside the RO8 to secondary development land**

If this new route is, as stated above, to provide access to ‘lands and properties only accessed via the N11’, this function could be equally well achieved by inserting a parallel slip road at the front, with barriers, instead of at the rear of the properties. This could also be a much cheaper alternative.

However, if the road is actually designed also to access the new houses which would then be built on the east of it (on land which has been redesignated as secondary development instead of agricultural), this opens up development in the area in an insensitive way along the unspoiled lower slopes of the Little Sugarloaf. Houses will then be built along the road in a ribbon development.

It was stated verbally to me by one of the planners that this ‘access’ road would continue to the Southern Cross Retail Park at Bray, but that it would be a ‘green road’, whatever that means. I believe that this is just the thin end of the wedge and that, in time, the ‘green road’ will be widened, further land redesignated and Kilmacanogue will become contiguous with Bray, directly against the stated objectives of the ‘Kilmacanogue Settlement Plan’ which states that the Planning Authority intends “to ensure that the two settlements do NOT coalesce” (my capitals).

In my opinion, the redesignation of this strip of land constitutes over-development in that particular area of Kilmacanogue, and would impact negatively on the village in various ways:

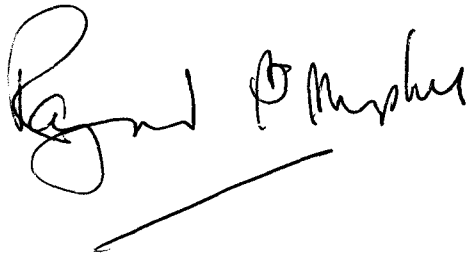
- The N11 has already cut Kilmacanogue in two with disastrous consequences for the integrity of the village. This additional parallel road would effectively cut it into THREE!
- Kilmacanogue is in a particularly scenic location, nestled as it is between the two Sugarloaf mountains. From the village, one tends to look upwards to the mountain slopes. The new road and its new houses would ruin that unspoilt view.
- The lower slopes of the Little Sugarloaf are at present a safe haven for a rich diversity of wildlife, many of which are endangered. Pine martens, red squirrels and hedgehogs have been spotted here. They would be driven away by the proposed development.

- Hedgehogs in particular are threatened by road construction, especially in a situation such as this, where two roads run approximately parallel, with a strip of land like an island between them. Hedgehog numbers are declining dramatically in Britain, from about 50 million in the 1950s to about 1 million today, and there is no reason to believe that Ireland's hedgehog population is any different. The main cause of death in hedgehogs is the loss of habitat and being run over, mainly at night as they forage for food. Both these factors would come into play if the new road is built. Any increase in roads is a threat to hedgehogs – new roads carve up their available habitat, and any hedgehogs unlucky enough to find themselves in the strip of land between the N11 and the new road will undoubtedly perish.

**The presence of the invasive weed Japanese Knotweed in the environs of Kilmacanogue could impact on the building of houses.**

We know that Japanese Knotweed has been found on both sides of Kilmacanogue: there is a sign to this effect on the Kilmurrey Cottages road on the east of the village, and it has also been found in land on the west near the GAA pitch. This plant has been described by the UK Environment Agency as "indisputably the UK's most aggressive, destructive and invasive plant", and has led to mortgages being refused for houses there. Land proposed to be redesignated in order to build houses surely should be checked in case this invasive weed is present. Millions were spent clearing it from the site of the London Olympics.

Yours faithfully,



Raymond and Etain Murphy

**Submission from:**

**Raymond and Etain Murphy**

**Hillside**

**Bohilla Lane**

**Kilmacanogue**

**Bray**

**Co Wicklow**

**A98 HC89**

**Leonora Earls**

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**From:** Rory Murphy  
**Sent:** 11 September 2017 19:54  
**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:** No to rezoning of lands on Southern Cross

To whom it may concern,

I am writing to object in the strongest possible terms to the potential rezoning of lands on the Southern Cross road.

As it currently stands there are no local amenities on the road with the exception of Shoreline.

There are no shops, no play areas for children, nothing at all for the local community despite the numbers living here.

The traffic on the Southern Cross road in the morning is already at crisis point, in both directions especially during the school run.

The sheer volume of traffic cannot be sustained and the possibility of an additional 240 houses will bring the whole thing to a grinding halt.

In the evening the stretch of road south bound from Cherrywood to the Bray South exit is a car park.

I know this as I travel it every day.

I work in Dublin Airport and half of my travel time is from the airport to Cherrywood, the second half to my door in Swanbrook.

How is this possible and how on earth do the planners think they can manage that additional volume?

The simple answer is the road is not designed for the traffic on it currently, let alone any additional cars.

Any public transport within walking distance is limited and sporadic at best.

So on behalf of myself, my wife and my two sons I again object to the potential rezoning of lands on the Southern Cross road.

Thank you for taking the time to read this.

Yours sincerely

Rory Murphy,  
2 Swanbrook,  
Bray  
Co. Wicklow



C212

Tony & Caroline  
Murphy  
38 Giltspur Wood,  
Bray,  
Co Wicklow  
Date: 7th Sept. 2017

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



**Ref. BRAY MD LAP 2017**

Dear Administrative Officer:

We wish to object 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 outline several reasons for this objection.

**1. Health and Safety**

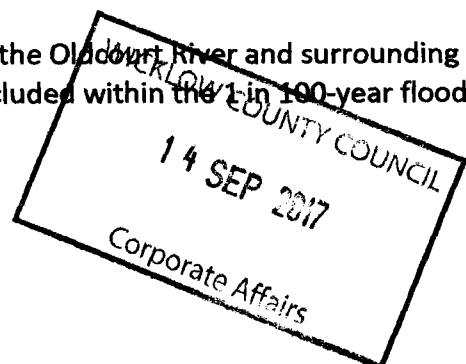
- a. To gain access to the proposed site would require breaking through an existing, safe and child friendly, cul de sac which has been part of the estate for over 20 years.
- b. The popular and child friendly green area is essentially the playground of the estate; Access to the land would bring large amounts of traffic directly beside the green area bringing an increased risk to child safety.
- c. 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.

**2. Traffic Congestion**

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

**3. Flood Risk**

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



**4. 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".

**5. Wildlife**

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

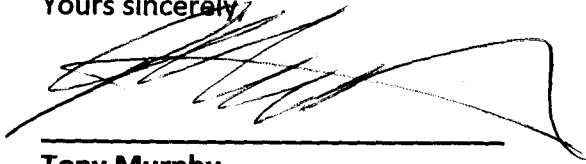
**6. Protected Structures**

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

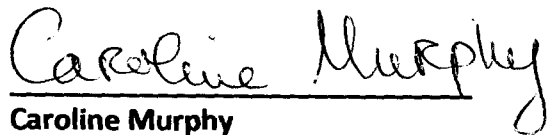
We purchased our house in 1997 with the knowledge that it was a complete estate and there was green space around it.

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

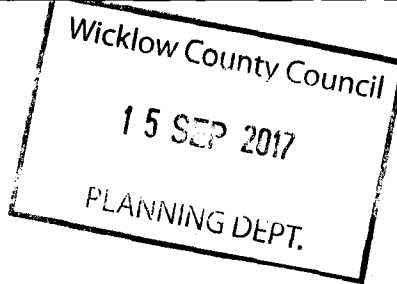
Yours sincerely,



**Tony Murphy**



**Caroline Murphy**



C213

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

## **Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

### **1. Natural Amenity:**

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

### **2. The Character of Kilruddery Demesne:**

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

### **3. Flooding:**

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed

*Jonathan Murray*

*John Murray*

Address

*109 Hollybrook Park  
Southern Cross Rd  
Bray  
Co Wicklow*

**Leonora Earls**

---

**From:** paul murray  
**Sent:** 15 September 2017 17:14  
**To:** Leonora Earls  
**Subject:** Re: Bray LAP 2017

C214

Thanks Leonora. In a rush so a few minor amendments if that's okay,

Best Regards,

Paul Murray

**To the administrative officer, Planning Section, My Details:**

**Paul Murray,**  
**7 Deepdales,**  
**Southern Cross Road,**  
**Bray**  
mob: C

As a long-time resident of the Southern Cross Road I am writing to you to object to the proposed changes to land use in the DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017, not only due to their exacerbating effect on local traffic and risk of flooding but also due to my feeling that the proposed changes do not tally with the vision informing the LAP for Bray which envisages the Bray Municipal District as 'a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected;' ( DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 page 3). Adding more residential and light industrial development to an area which has languished for years without the basic amenities which would allow it to become a 'walkable community whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance.' ( DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 page 5) would not be helpful in this regard as it simply adds more residents to the town who are lacking in all of same.

I feel that the vision informing the document is too narrow at times 'Bray Seafront and Bray Head draw a significant number of day trippers to the town.' (DBMDLAP 2017 page 71). Killruddery Estate is a significant omission here as it has a vast potential to be, as the Killruddery motto itself states, 'A place to escape' for the residents of Bray and the wider Wicklow and South Dublin community, not to mention its ability to attract visitors from further afield.

Twice in the Plan the primacy of the Seafront area as the main leisure centre of the town is asserted e.g. 'The Seafront area shall be promoted as the primary tourist, recreational and leisure centre of Bray.' (DBMDLAP 2017 page 71). Again, I believe that the area of The Killruddery Estate and the Little Sugarloaf, linking with the Sugar Loaf Mountain itself, has enormous potential to be a leisure centre for the local population, a potential which is being underestimated in the vision informing this narrow focus on the seafront area. Rather than encroaching on it with what I would regard as 'piecemeal' development, which the Plan itself decries on numerous occasions, I feel the AONB of Killruddery and the Little Sugarloaf and its environs should be fully protected in order to ensure its value as a resource into the future.

**Sincerely,**  
**Paul Murray,**

**Local resident.**

On Fri, Sep 15, 2017 at 5:07 PM, Leonora Earls <[LEarls@wicklowcoco.ie](mailto:LEarls@wicklowcoco.ie)> wrote:

I wish to acknowledge receipt of your email in connection with the above

Kind Regards

Leonora Earls

Administrative Officer

Planning and Development

---

**From:** paul murray [mailto:[paul.murray@wicklowcoco.ie](mailto:paul.murray@wicklowcoco.ie)]  
**Sent:** 15 September 2017 16:59  
**To:** Planning - Plan Review  
**Subject:** Bray LAP 2017

I wish to the administrative officer, Planning Section,

**My Details:**

**Paul Murray**

**97 Deepdales,**  
**Southern Cross Road,**  
**Bray**  
**mob: 087 901 1111**

As a long-time resident of the Southern Cross Road I am writing to you to object to the proposed changes to land use in the DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017, not only due to their exacerbating effect on local traffic and risk of flooding but also due to my feeling that the proposed changes do not tally with the vision informing the LAP for Bray which envisages the Bray Municipal District as 'a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected;'.

Adding more residential and light industrial development to an area which has languished for years without the basic amenities which would allow it to become a 'walkable community whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance.' ( DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 page 5) would not be helpful in this regard as it simply adds more residents to the town who are lacking in all of same. 'Bray Seafront and Bray Head draw a significant number of day trippers to the town.' (DBMDLAP 2017 page 71). I feel Killruddery Estate is a significant omission here as it has a vast potential to be, as the

Killruddery motto states, 'A place to escape' for the residents of Bray and the wider Wicklow and South Dublin community not to mention its ability to attract visitors from further afield.

Twice in the Plan the primacy of the Seafront area as the main leisure centre of the town is asserted 'The Seafront area shall be promoted as the primary tourist, recreational and leisure centre of Bray.'

(DBMDLAP 2017 page 71). Again, I believe that the area of The Killruddery Estate and the Little Sugarloaf, linking with the Sugar Loaf Mountain itself, has enormous potential to be a leisure centre for the local population, a potential which is being underestimated in the vision informing this narrow focus on the seafront area. Rather than encroaching on it with what I would regard as 'piecemeal' development, which the Plan itself decries on numerous occasions, I feel the AONB of Killruddery and the Little Sugarloaf and its environs should be fully protected in order to ensure its value as a resource into the future.

Sincerely,

Paul Murray,

Local resident.

\*\*\*\*\*" This message is intended only for the use of the person(s) ("the intended recipient(s)") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Wicklow Local Authorities. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as Wicklow Local Authorities do not accept any liability for contamination or damage to your systems.

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



C215

**Leonora Earls**

---

**From:** Paul Murray  
**Sent:** 11 September 2017 14:00  
**To:** Planning - Plan Review  
**Subject:** Proposed rezoning of lands on Southern Cross Road

To whom it may concern

I strongly object to the proposed rezoning as included in the draft plan for the following reasons

The already heavy volume of traffic on the Southern Cross Road

Development should not take place on such an amenity as the Little Sugarloaf. Why did local councillors not adopt the Ministerial Order from 2008 directing that the area should be designated a special amenity?

As a resident of Swanbrook ,I note that access to the new development(s) will be via our estate . The road is busy enough with the current level of traffic.

Where are the local amenities that were promised when our estate was built back in 1996? The Southern Cross Area is sorely lacking even the most basic of these amenities. It makes no sense to consider building more properties given this deficiency.

I trust you will note my objections .

Regards

Paul Murray  
33 Swanbrook  
Bray

Sent from my iPad

**Leonora Earls**

---

**From:** Deirdre Kirwan  
**Sent:** 15 September 2017 16:00  
**To:** Planning - Plan Review  
**Subject:** Submission on Draft Bray LAP  
**Attachments:** Bray LAP Submission (Nechouka Limited) FINAL.pdf

Dear Sir or Madam,

We refer to the Draft Bray Municipal District Local Area Plan 2017 which invites submissions from interested parties until 15th September 2017.

Please accept this email and attachment as a formal response to this consultation process on behalf of our client Nechouka Limited.

We would be grateful if you could confirm receipt of this submission at the earliest.

Kind regards,

**Deirdre Kirwan**  
John Spain Associates,  
39 Fitzwilliam Place,  
Dublin 2,  
D02 ND61.  
T: 01 662 5803  
M: 087 2826855  
e-mail: [dkirwan@johnspainassociates.com](mailto:dkirwan@johnspainassociates.com)  
web: [www.jsaplanning.ie](http://www.jsaplanning.ie)



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

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

Dear Sir / Madam,

**RE: SUBMISSION BY NECHOUKA LIMITED ON THE DRAFT BRAY MANICIPAL DISTRICT LOCAL AREA PLAN 2017 IN RESPECT OF LANDS AT SOUTHERN CROSS BRAY, CO. WICKLOW**

**1.0 INTRODUCTION**

- 1.1 We refer to the Draft Bray Municipal District Local Area Plan 2017 which invites submissions from interested parties until Friday, 15<sup>th</sup> September 2017. Please accept this letter as a formal response to this consultation process.
- 1.2 Our client Nechouka Limited, Third Floor, Huguenot House, Saint Stephen's Green, Dublin 2 D02 NY63 has instructed John Spain Associates to prepare this submission on their behalf.
- 1.3 This submission relates to lands at Southern Cross Road, Bray Co. Wicklow. Our client is the owner of these lands which are identified as Neighbourhood Centre (NC) in the Draft LAP. Our clients land holding extends to approximately 4.80 ha in total.
- 1.4 This submission is in support of the lands zoning as Neighbourhood Centre (NC) which has an objective to *'protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.'*
- 1.5 This submission also supports the Zoning Clarification Note published on the Wicklow County Council website on August 21<sup>st</sup> 2017 which provides for a written description, objective and permissible uses under the NC (Neighbourhood Centre) zoning. The zoning clarification note states the following in relation to Neighbourhood Centres:

Managing Director: John P. Spain BBS MRUP MRIGS ASCS MRTPI MIPI

Executive Directors: Erika Casey BA (MOD) MRUP MRTPI MIPI

Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MS:ERM MAT&CP Dip EIA Mgmt. MIPI

Associate Director: John Tierney BA(Hons)M.Plan MRTPI

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



*"To provide for small scale mixed use commercial / community / retail developments that serve only an immediate catchment or planned new areas of significant residential expansion."*

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

1.6 It is submitted that this subject lands are strategically located to deliver appropriate 'Neighbourhood Centre' uses (in accordance with the above) which will contribute to the vibrancy and vitality of Bray and contribute to meeting the local needs of the community in terms of housing and other supporting facilities.

1.7 The full grounds for the proposed amendments are set out in Section 3 below.

## 2.0 RELEVANT PLANNING POLICY CONTEXT

### Draft Bray Municipal District Local Area Plan 2017

2.1 Figure 1 (below) identifies the subject site is zoned 'NC' which has an objective to 'protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.'



Figure 1 - Zoning Map: Draft Bray Municipal District Local Area Plan 2017

- 2.2 The written statement to accompany the maps and schedules of the Draft LAP did not make reference to lands zoned Neighbourhood Centre (NC) in terms of zoning objective, description or permissible uses.
- 2.3 We note on 21<sup>st</sup> of August 2017 that this was added as a supplementary document to the Wicklow County Council Website, below, seeking to identify the intentions of the Draft LAP.

ZONING	OBJECTIVE	DESCRIPTION	Note
<b>NC: Neighbourhood Centre</b>	To protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.	To provide for small scale mixed use commercial / community / retail developments that serve only an immediate catchment or planned new areas of significant residential expansion.	Locations: Boghall Road / Ballywaltrim, Vevay Road, Dargle Road, Dublin Road – Little Bray, Albert Road and walk, Fassaroe and Bray Southern Cross Road

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

**Figure 2 - Zoning Clarification Note 21st August 2017 ([www.wicklow.ie](http://www.wicklow.ie))**

- 2.4 The Town Centre and Retail Strategy within the Draft LAP states the following in relation to lands at Southern Cross Road:

*“The Planning Authority will allow for the development of a new appropriately scaled neighbourhood centre on the Southern Cross Road, to provide for the day to day needs of residents and employees of the area but does not undermine the role of Bray town centre as the principal shopping destination.”*

- 2.5 The Draft LAP goes on to states that *“a neighbourhood centre comprises a small group of shops, typically comprising newsagent, small supermarket / general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population.”*
- 2.6 It is noted that there is no specific reference in the Town Centre and Retail Strategy of Draft LAP to the scale or size of the retail unit / supermarket which would be considered acceptable in such a Neighbourhood Centre.

### 3.0 GROUNDS OF THIS SUBMISSION

- 3.1 As highlighted in Section 1 above, our client is supportive of the lands at Southern Cross Road being zoned for Neighbourhood Centre (NC), which includes residential development as a permissible use.
- 3.2 The lands are strategically located north of the R768 and east of Árd Na Greine and are considered to be capable of meeting the Neighbourhood Centre (NC) zoning objective which is to *‘protect, provide for, and improve a mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community.’*

- 3.3 While the proposed zoning for the subject lands is supported by our client, it is considered that more clarification needs to be provided within the written statement of the LAP in terms of the size and scale of the retail / supermarket element that may be acceptable on lands with 'NC' zoning.
- 3.4 The Draft LAP states that "a *neighbourhood centre comprises a small group of shops, typically comprising newsagent, **small supermarket** / general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population.*" (JSA emphasis added)
- 3.5 It is considered that a small supermarket element of circa 1,700 sq. m gross (1,300 sq. m net) would be appropriate in this case and assist in providing for the day-to-day needs of the local community in accordance with the 'NC' zoning objective.

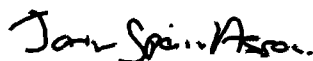
*Support for Neighbouring Site Draft LAP Submission*

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

**4.0 SUMMARY AND CONCLUSION**

- 4.1 This submission is made on behalf of Nechouka Limited, Third Floor, Huguenot House, Saint Stephen's Green, Dublin 2 D02 NY63 in relation to lands at Southern Cross Road, Bray which are identified in the Draft LAP as being zoned for 'NC' Neighbourhood Centre.
- 4.2 Our client supports the proposed Neighbourhood Centre (NC) zoning in respect of the subject lands and request there be clarification on the zoning note issued 21<sup>st</sup> August 2017 and that this is incorporated into the adopted plan as a modification to the draft plan.
- 4.3 In addition, it is considered that the written statement of the Bray LAP should provide some additional clarification on the scale and size of a proposed supermarket which would be acceptable on NC zoned lands.
- 4.4 It is considered that a retail / supermarket element of circa 1,700 sq. m (gross) would be appropriate for a Neighbourhood Centre in a town of the size and function of Bray and would assist in providing for the day-to-day needs of the local community in accordance with the 'NC' zoning objective.
- 4.5 We respectfully request the Planning Authority to take this submission into account and to undertake the amendments proposed herein.

Yours Faithfully,



---

**John Spain Associates**

C217

Wicklow County Council  
15 SEP 2017  
PLANNING DEPT.

118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

**Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

1. Natural Amenity:

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

2. The Character of Kilruddery Demesne:

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

3. Flooding:

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.



4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed

Bernie Nesbitt

Address

108 Hollybrook Park  
Bray,  
Co. Wicklow

**Leonora Earls**

---

**From:** Pat Nolan  
**Sent:** 15 September 2017 15:13  
**To:** Planning - Planning and Development Secretariat  
**Subject:** Enniskerry in Wicklow County Development Plan 2016-2022  
**Attachments:** Nolans' Dev Plan observation15.9.docx

C218

Dear Sir/Madam,

Please find attached our observations on Enniskerry in the Wicklow County Development Plan 2016-2022.

Thanks,

Regards,

Pat & Sheila Nolan

**SUBMISSION ON CO WICKLOW DEVELOPMENT  
PLAN**

**Pat & Sheila Nolan  
'Louisville'  
Enniskerry  
Co Wicklow**

We wish to make a number of observations on the draft Wicklow County Development Plan 2016 – 2022, specifically in relation to Enniskerry and environs.

While overall, the plan appears to be sensitive to Enniskerry's particular history, heritage and natural environment, it would not appear to realise the impact that over 400 additional housing units would have on traffic, noise and congestion in what is actually the small throughway of the village itself. The existing village residents are often forgotten in discussions on tourism, trade, traffic etc.

We particularly wish to put forward observations on the proposed idea of the development of 2.5 hectares off Kilgarron Hill (**R40/SLO2** – 'Action Area 2, Lands at Kilgarron', set for 28 potential units of housing which we believe to be unsuitable for purpose both visually and practically.

### **Point 1: Green bowl of the village**

It is hugely important to preserve the surrounding green backdrop (the bowl) of the village untouched. This is as much a part of the village structure as the built environment within it.

The area at 'the stables' (page 11 under Specific Local Objective 2) is exactly in this backdrop category and can be seen from many angles, especially approaching on the Dublin road – the first view that many have of the village itself. Any two-storey structures in this position would be visible and would partially obscure this backdrop.

### **Point 2: Protection of the skyline/backdrop**

The building lines and heights of houses built on this site will inevitably be visible from many angles/positions and would overlook and destroy the privacy and the ambient light of many houses nearby, especially the cottages and houses directly below which are included in the Area of Architectural Conservation and in so doing, affect their traditional setting.

The additional new street lighting that would inevitably accompany any new housing development would be obtrusive and discordant on the village character.

### **Point 3: Access to proposed site**

The narrow and hidden entryway to the proposed rezoned site which does not allow cars to enter or exit simultaneously – which is also so close to a busy junction – would be dangerous and totally unsuitable.

Cars at this point increasing speed to ascend Kilgarron Hill, would add to the danger. As many residents use this area of the hill to park the entryway visibility would be poor.

**Point 4: Drainage and water run-off**

Over the years there have been drainage problems with run-off water from this site which has caused flooding/damage to the houses below.

Construction interference could significantly add to this problem.

Finally we believe it would be a sad loss for all of us in Enniskerry and County Wicklow to see Enniskerry subsumed into the expanding suburbs of Dublin.

We believe a protective 'green belt' barrier of fields etc should be left around Enniskerry to prevent 'merge'.

We appreciate the pressure for housing and development so close to a large city but let us not destroy something as unique as Enniskerry village and environs in achieving it.

Thank you for your attention.

ENDS

**Leonora Earls**

---

**From:** francesmnolan [f-  
**Sent:** 14 September 2017 23:17  
**To:** Planning - Plan Review  
**Subject:** Rejection of proposal to build Residential Homes at Kilruddery Estate, Bray

Good evening

I write to you to reject the vote to build a residential development on the grounds of the Kilruddery estate, Bray Co Wicklow. I have lived in Deepdales Estate on the Southern Cross since 1997 (Born in Little Bray 19xx) I work hard every day and in the evenings/weekends come home to take in beauty of my surroundings..I am an open minded individual who would not oppose the building of homes where required however on this one occassion I am objecting, one concern is I don't believe we have the access to facilitate the current traffic flow.

Please reject this plan...

Frances Nolan  
DEEPDALES Resident  
Sent from my Samsung



BRAY MD LAP

41 Giltspur Wood,  
Bray.  
Co. Wicklow.

Wicklow County Council  
13 SEP 2017  
PLANNING DEPT.

Re: oldcourt rezoning 10.9.17 C220

Dear Sir or Madam,

I wish to very strongly object  
to the rezoning of lands at oldcourt  
adjacent to Giltspur Wood.

I bought my house because  
it was in a cul de sac and a safe  
place to live.

The wonderful old trees are  
protected as they should be. also  
the green space and wild life which  
is along the Slane River valley  
ensuring no negative impact on  
the natural environment.

yours faithfully,

Dorothy O'Brien

WICKLOW COUNTY COUNCIL  
\* 13 SEP 2017

DOROTHY O'BRIEN

DOROTHY O'BRIEN  
41 GILTSPUR WOOD,  
BRAY.  
Co. WICKLOW.

Objecting to rezoning of oldcourt  
adjacent to GILTSPUR WOOD.



44 Giltspur Wood,  
Bray,  
Co. Wicklow

11<sup>th</sup> of September 2017

C221

**Re: BRAY MD LAP**

To whom it concerns,

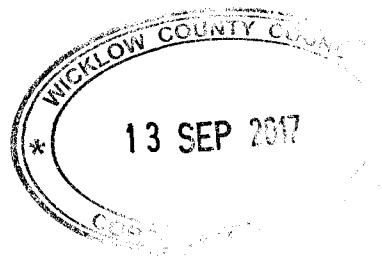
We wish to object to the rezoning of land beside Giltspur Wood, Bray, Co. Wicklow.

The reasons for our objections are as follows:

1. **Traffic/Health & safety**
  - There would be construction traffic going through the existing estate for one year which would be of a major safety concern for the many children in the estate, who play on the greens, walk/cycle to & from school. In 2001/2002 when there was previous building work carried out in this estate 2 children were seriously injured & we not like to see a repeat of that.
  - The area near where the construction traffic would enter the building site is where children play daily.
  - It would involve breaking through an existing cul de sac.
  - There is already lots of traffic from old soldier's road, which is used as a rat run, so we don't want to add to the existing traffic problem.
2. **Loss of green space if the land is rezoned.**
  - There is lots of wildlife living on that land & lots of trees, plants, flowers etc growing. There are bats which are protected under The Wildlife Act 1976.
3. **There would be an additional loss of green space in our existing estate to facilitate access to these new houses.**
4. **The Castle on the land is 600 years old & was built in the 15th century, inside the castle there is an even older baptismal font, these structures should be protected.**
5. **There is a tree preservation order on the land.**

Kind Regards

*Emma O'Brien*      *Eoin O'Brien*  
-----  
Emma & Eoin O'Brien



**Submission concerning Bray Municipal District Local Area Plan 2017**

**Names:** Emma & Eoin O'Brien

**Address :** 44 Giltspur Wood, Bray, Co. Wicklow

**Contact Details:**

C222

## Leonora Earls

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**From:** Jacinta  
**Sent:** 08 September 2017 20:52  
**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; ICullen@wicklowcoco.ie; 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:** Objection to rezoning of fields in Killruddery

To whom it may concern,

I wish to object to the rezoning of a number of fields in Killruddery for residential housing and factories. There are enough fields and unoccupied land around Bray to accommodate these ventures.

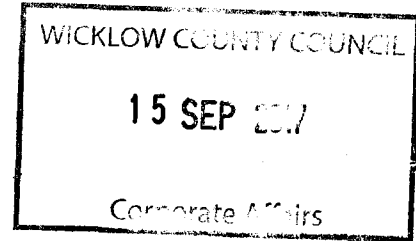
This rezoning will effect the chronic traffic situation that is at present on the Southern Cross road.

The amount of flooding in the rear of my and other housing in Hollybrook Park is horrendous during the winter months. Anymore building up here will have a catastrophic effect on my home.

There is not enough infrastructure in this area to accommodate this plan. It would be shameful to destroy our beautiful Tourist Attraction which is Killruddery Estate for building where there is plenty of derelict land all over Bray which can be used for these ventures.

Yours Sincerely,  
Jacinta O'Brien  
14 Hollybrook Park

Planning Department  
Wicklow County Council  
Whitegates  
Wicklow Town  
Co. Wicklow  
A67 FW96



Dear Sir/Madame

**Re:- Rezoning of lands in Oldcourt adjacent to Giltspur Wood, Bray Co. Wicklow**

I wish to raise objections to the proposed rezoning of lands in Oldcourt adjacent to Giltspur Wood, Bray Co. Wicklow

My objectives are as follows:

**1) Loss of community green space area**

The potential entry into the new rezoned housing site is beside a community area which is used by residents of the estate especially our kids to play football/rugby/basketball and cycle their bikes. The proposed new builds could lead to a reduction in this community area to facilitate the proposed entrance plus the additional traffic so close to the area would leave kids in danger and with parents with no choice but not to allow our kids play on this green space.


**2) Traffic / Health and Safety**

- a) There would be substantial construction traffic going through the existing estate for an unknown length of time which is a major concern for the children playing in the estate and on the large green areas. There was previous building work carried out on an cul.de sac in our estate and there were a number of injuries (broken arm, head injury) sustained by children who entered the building site during construction phase.
- b) The area under construction would be a playground for the small children and teens for anti-social behaviour.
- c) The traffic entering and exiting the estate on Soldiers Road is already choked up and this would only make the current problem worse.

- 3) Loss of **green space** (trees, wildlife etc.) if land is rezoned this will be contrary to current council policy Section 8.4.4.1 Bray Town Development Plan which seeks to protect natural wildlife habitats.

- 4) There is a **protected structure** on the land adjacent to the proposed new site. The Oldcourt Castle is a protected structure under RPS 65 Table 8.3 Bray Town Development Plan.
- 5) There is a **tree preservation order** on the trees on the land and Council policy under Section 8.4.4.2 seeks to not only preserve but enhance town amenities including its appearance ~~with~~ trees, woodlands and hedgerows.
- 6) The land is current zoned as OS4 with the aim of preserving continuous open spaces along the Swan River ensuring no negative impact on the natural environment. Council current policy is to **preserve views and prospects** including The Swan River Valley is listed as a Protected View under View No. 4 in table 8.1 (Section 8.4.3.).

I would be grateful if you would consider my concerns in relation to your decision on the proposed land rezoning.



Joseph O' Callaghan

82 Giltspur Wood

Bray



**Leonora Earls**

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**From:** Fia O'Caoimh [  
**Sent:** 15 September 2017 16:57  
**To:** Planning - Plan Review  
**Cc:**  
**Subject:** Submission in relation to the Bray Municipal District Local Area Plan. 2017 - 2023.

Dear Sir/ Madam,

I believe that the following elements should be incorporated into the new Bray Municipal District Local Area Plan. 2017 - 2023.

**Special Amenity Area Order.**

I believe that both the Big Sugarloaf Mountain and the Little Sugarloaf Mountain should be awarded Special Amenity Area Order status

in recognition of their unique upland environment, and in order to preserve them in good condition for the enjoyment of future generations.

In adopting such Special Amenity Area Order status, it is vital that the accompanying SAAO Management Plan be carefully tailored to ensure the ongoing protection of each of the long-standing established businesses and farmsteads already in operation on the mountain slopes.

Reasonable protections should be incorporated to ensure that the following upland groups are not restricted in any way.

1. Horseriding or horse trekking.
2. Farming or farm related businesses.
3. Housing for appropriate "farm-related" workers/families.
4. Normal/ moderate intensifications of such established usage.

I suggest that the SAAO Management Plan for nearby Bray Head be used as a base document, and that it be reviewed and modified as required to ensure that all of the main landowners and farm/businesses in the area are fairly consulted, and satisfied that they will not be adversely impacted.

In this way the future of these two wonderful mountains can be best preserved into the future.

Kindest regards

Fia O Caoimh.

O Caoimh and Associates Architects.

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**OCAA**

**Leonora Earls**

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**From:** Antoinette O'Connor [  
**Sent:** 11 September 2017 23:29  
**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; ICullen@wicklowcoco.ie; 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:** Objection to rezoning of fields in Killruddery

To whom it may concern,

I wish to object to the rezoning of a number of fields in Killruddery for residential housing and factories. There are enough fields and unoccupied land around Bray to accommodate these ventures.

This rezoning will effect the chronic traffic situation that is at present on the Southern Cross road.

I want to make it clear I object to the rezoning of fields in Killruddery

Antoinette O'Connor

44 Hollybrook Park  
Bray

Sent from my iPad

**Leonora Earls**

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**From:** Edward O'Connor [mailto:edward.oconnor@bray.ie]  
**Sent:** 15 September 2017, 10:55  
**To:** Planning - Plan Review  
**Subject:** Local Area Plan for Bray

As long term residents of Charnwood estate in Bray we would like to express our concerns about development on land beside Charnwood on several grounds.

1/ The entrance to the estate and other roads in the estate cannot take any further traffic so access should not be through Charnwood.

2/ We would be concerned for the preservation of the beautiful mature trees which should be protected, not destroyed or damaged.

3/ Oldcourt Castle should be protected as it is a part of the town's history.

While appreciating the need for houses surely this should not be at the expense of the few remaining open spaces within the present town boundaries, which could be developed as a park for the enjoyment of all.

Edward and Anne O'Connor  
28 Charnwood

C227



118 Hollybrook Park,  
Bray,  
Co. Wicklow  
13/09/2017

### **Objection to the draft Bray Municipal District Local Area Plan 2017**

To whom it may concern,

As a Hollybrook Park resident I have read and examined the draft district local area plan 2017 and find the content regarding the rezoning of Kilruddery Demesne West for New residential and New employment very concerning. It would change this wonderful natural area in a way that could not be reversed and lost for future generations. My concerns are as follows.

#### **1. Natural Amenity:**

The Draft Bray Municipal District LAP 2017 refers to the Little Sugar Loaf mountainous region as an 'area of outstanding natural beauty' in the Wicklow County Development Plan landscape strategy. It states that it is an important recreation amenity both locally and for visiting tourists. Therefore building 240 houses and including a new employment area on the slopes of the Little Sugar Loaf would be spoiling this natural amenity. This impacts negatively on the local people and on visitors to the area.

#### **2. The Character of Kilruddery Demesne:**

Under the Architectural Heritage Objectives in the Draft Municipal District LAP 2017, AH5 states that the plan is 'to maintain and protect the nationally significant demesne settings of the Powerscourt Estate and Kilruddery House, and to require all development proposals within or directly adjoining these demesnes to fully evaluate and address any impacts on the setting and character of the demesne'. Building 240 houses and a new employment area will adversely affect the character of Kilruddery's demesne. The Draft plan states that vehicular access to the housing shall be via the existing Kilruddery entrance. This would severely impact the character of Kilruddery House and Gardens. Rather than developing the environs of Kilruddery House and Gardens, the County Council should be protecting the County's Heritage.

#### **3. Flooding:**

In Chapter 2 of the Draft Municipal District LAP 2017 under the title 'Flood Risk', it states that one of the core objectives is to avoid inappropriate development in areas at risk of flooding. A second objective is to 'avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off'. We have video footage from the summer of 2008 showing severe flooding on the Kilruddery side of the wall as a result of rapid surface run-off from the Little Sugar Loaf. The footage shows how the Kilruddery wall actually protects the Hollybrook Park houses from flooding. If 240 houses and an office/industrial area were built on the slopes of the Little Sugar Loaf, there would be a decrease in the ability of the land to absorb rainwater and therefore an increase in surface run-off leading to greater flooding. Since flooding is already a problem both on the road through Kilruddery where vehicular access is planned to the housing area and in the Hollybrook Park estate in the back gardens near the Swan river and generally in Hollybrook Park, it does not seem appropriate to build more houses in an area which has an existing flooding problem.

4. Traffic:

As residents of Hollybrook Park, we have great difficulty getting out on to the Southern Cross Road because of the volume of traffic on the road. Turning right from Hollybrook Park can take five minutes because of the sheer volume of traffic on the Southern Cross Road. In addition, the queue of traffic waiting to access the N11 is often backed up as far as the industrial estate. This illustrates how the existing road infrastructure is inadequate for the current housing and industrial premises. To increase the number of houses and to build a new employment area would increase the volume of traffic on the Southern Cross Road making it even worse for residents trying to get to school and work and cause further delays for commuters trying to access the N11 during rush hour.

5. Green Belt:

The existing green Belt along the entrance to Hollybrook Park provides a natural buffer to loud noise generated by the Industrial Area along side. It is an area of diverse wildlife including rare Bird species. To contemplate a pedestrian way and cycle path would destroy this natural amenity. The extra traffic along this route will likely increase crime in Hollybrook Park and further advantage Antisocial Behaviour and noise around the pathway.

6. Alternative Sites:

The destruction of the Little Sugar Loaf in the proposed plan seems incredible when there is existing zoned land available for development along the north side of the Southern Cross Road . This land has been idle for 20 years. This zoned area should be considered instead of the proposed Killruddery area

The reasons given above are strong arguments against the planned zoning of the lower slopes of the Killruddery demesne.

Signed

*Sarah Jane O'Connor*

Address

*114 Hollybrook Park  
Southern Cross Road  
~~Bray~~ Bray  
Co Wicklow*

**Leonora Earls**

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**From:** Phil O' Donnell  
**Sent:** 13 September 2017 14:11  
**To:** Planning - Plan Review  
**Subject:** Kilmacanogue Development plan

A Chara

I am contacting you regarding the current proposal for Kilmacanogue. While I appreciate that the current road in our village is highly dangerous and sympathise with residents on the main road, I strongly object to Wicklow Co plans.

We are so proud and protective of our environment and unfortunately the proposed plan is, in my opinion, destructive. I want to continue to live in the 'Garden of Ireland and NOT the 'Patio' of Dublin.

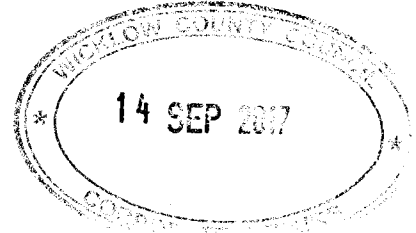
Is mise le meas

Phil O Donnell  
Glencap Common  
Kilmacanogue

PS for the record I have NEVER objected to a planning application or development of any kind

Bray, 12-Sep-2017

Administrative Officer  
Planning Section  
Wicklow County Council  
Station  
Wicklow Town



**Reference: Bray MD LAP**

To whom it may concern

We are writing to you regarding the plan to rezone the Lands at Oldcourt Castle. This filed is right behind our house. The area is marked to be rezoned as residential area, type R20. We have some serious concerns about this development.

Our main concern is that of safety for the kids in the estate. Currently the plan is to break through a cul-de-sac wall in our estate to access the new houses. While this is the shortest route to these new proposed houses, it will impact on the lives of many people in the estate, dare I say it will chance the nature of our estate. As you can see in the attached map, the new road (marked in red) will go right through the blue safety zone in our estate. It will no longer be possible for parents to allow their kids to "the green" (as we call area 1) and be happy with the knowledge that they can't wander off or have to cross a through road to collect a ball/slither. Many people in the estate bought their house based on the fact that it was a fairly small estate with a green area and safe for their kids. This could all change once this land is going to be developed. We have a young son with Down-Syndrome and currently he can go onto the green to play or walk our dog on his own. If a through road is going to be built to the new development then we will not be happy to let him out unsupervised.

Needless to say the building traffic going to the new development, as it stands, will go right through the heart of the estate. A smaller development (yellow zone) a few years ago led to two accidents involving the kids in our estate. We cannot help but think that building traffic at a much larger scale, with much heavier equipment, and, in a more prominent area isn't going to cause any serious accidents and god forbid cause casualties. About two years ago a teenage girl from our estate died on the green due to an unfortunate medical reason. The aftermath of the event and the funeral have made a deep impact on our community and I do not want to attend another funeral for any of our children in the estate, certainly not due to the result of a building related accident.

We are asking you to vote against the rezoning of this land.

Rob & Joan

Giltspur Wood





Area 1: "The Green" this is where the kids spend most of their time playing in the estate.

Blue line: safe paths for kids to access the play zone

Red line: proposed route to the new houses

Yellow area: previous new development

Our contact details:

Rob & Joan O'Dwyer

89 Giltspur Wood

Bray

Telephone: 0

Email: j@...com

**Leonora Earls**

**From:** Frederic Oehl  
**Sent:** 15 September 2017 09:13  
**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; Emma OEHL  
**Subject:** No to rezoning of lands on Southern Cross in Bray

Dear Madam/Sir,

As residents of Swanbrook, located off the Southern Cross Road in Bray, we are writing to you to express and record our objection to the planned rezoning of lands in the Bray area. Specifically we are concerned with the following proposals:

- the new zoning of Kilruddery Estate,
- new residential zoning on lower slope of small sugarloaf and
- new industrial zoning backing onto industrial estate.

Our specific objections to the plan are as follows:

- It does not appear that the limitations of current infrastructure have been considered in developing the plan.
  - Traffic on the Southern Cross Road is already an issue, in both directions in the morning, and towards the M11 during the afternoon, with traffic from both Greystones, and the Southern Cross merging at the Wilton roundabout, and traffic from the industrial estate, and Bray east accessing the M11. Two hundred or more additional cars trying to access this road will cause significant difficulties for residents, and current road users. Additionally traffic is backed up along the Greystones road to Windgates in the mornings. No plans for new public transport are included in the proposals. Existing public transport is limited at best.
  - In addition to the limitations of the Southern Cross, the M11 itself is not capable of dealing with the existing amount of traffic. South of Bray the road is at a standstill in the mornings, and in the afternoon, traffic is typically backed up to the Cherrywood junction. The planned additional 6500 new houses in Bray, will cause major traffic issues in the area, which will have a knock on effect for residents throughout Wicklow who use the M11 to travel from home to work.
  - Darts, and Dart parking are already stretched. Providing additional housing in the area, without increasing capacity of these, will put further pressure on these resources.
- The traffic regulation on the Southern Cross does not facilitate the current estates. It can take up to 6 minutes to leave the Swanbrook estate some mornings; On occasion, we have had to use the pedestrian lights to stop traffic to be able to leave the estate. Also when Kilruddery estate have events, Gardai are used to direct traffic to allow cars to leave the estate, all this on weekends when traffic is light. Additional houses in the area would lead to further delays leaving the estates in the morning.
- main access to the new estate appears to be via the Kilruddery entrance gate between Earlscroft and Swanbrook. At present, the road is safe for residents' kids, but increasing the traffic means more risk of road accident, especially if this traffic is coming from estates some way off, who are trying to access the main road.
- After attending a resident meetings, we have also discovered that some houses in Hollybrook, close to the small sugar loaf are subject to flooding. These residents are rightfully concerned that the new housing might worsen the flooding
- The Great and Small Sugarloaf mountains are beautiful natural resources, both in terms of the environment and the wild life in the area. In 2008, John Gormley, Green Party Minister for the Environment, made a ministerial order for the Small and Great Sugarloaf mountains to be a special amenity area but the council rejected the order in 2008. Building on these areas will negatively impact on the amenity.
- There are vacant lots on the southern cross, and yet no community resources, shops / playgrounds etc. Increasing the the number of residents without providing community resources risks increasing anti-social behaviour in the area.

While we appreciate that there is a housing crisis in the country, knee-jerk responses, such as the proposed plan are likely only to lead to similar issues to those experienced as a result of the last housing boom. Careful planning is required to ensure that we do not repeat the mistakes of the past. Surely more clever planning / lateral thinking could be employed to provide the required housing, without detracting from the existing natural amenities / exacerbating existing problems. We object to the proposed re-zoning plan, for these reasons, and ask all local councillors to do the same.

Best Regards,

Frederic OEHL

**Leonora Earls**

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**From:** Aoife O'Flaherty  
**Sent:** 31 August 2017 16:06  
**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 Municipal District, Local Area Plan. Killruddery Estate rezoning proposal

To Whom it May Concern

I wish to lodge my **OBJECTION** to the proposal outlined in your LAP which outlines a rezoning of land for both residential and commercial use within Killruddery Estate, including the development of 240 housing units on the base of the Little Sugarloaf.

My objection is based on numerous concerns I have regarding the proposal;

#### Infrastructure

1. Southern Cross Road already stretched to capacity in terms of traffic volumes
2. Lack of proper infrastructure on Southern Cross Road - road markings, pedestrian lights, refuse bins, dog bins, cycle lanes
3. No decent public transport to either Dublin or within Bray town itself
4. Failure to already utilise the commercial space on the Southern Cross. Land owned by Nechouka. Now contains loose horses!
5. Failure to utilise commercial space on the Boghall Road. Dell site and Schering Plough site. Derelict with antisocial behaviour!
6. Failure of council to maintain the current estates on the Southern Cross - maintaining green areas, signage, road markings, cleaning of drains

#### Natural environment

1. Building on an area of natural beauty that is actively used by all members of the public of Bray and beyond.
2. Building on a land where drainage is already extremely poor leading to flooding to houses at the back of Hollybrook. What will happen with the sewage / drainage for 240 houses if the land cannot cope already!
3. Building on a land that is used for farming, especially for commercial use, would be detrimental to the live-stock and sustainability in the long term of the farm. Better solutions can be found to provide support to the estate and in line with sustainable farming.

#### Additional concerns

1. Access to the new site could be amended at any time and come through the gated area of Earlscroft and Swanbrook already saturated with cars and very unsafe for families.
2. Proposed walkway through Hollybrook to commercial area leading to increase of cars and footfall into the estate and increase in antisocial behaviour

The lack of information provided publicly to those who will be affected regarding this rezoning has also lead to a huge mis-trust around the project and the overall intentions/motives.

I wish to have my concerns acknowledged and included in any discussions regarding the decision making process.

Yours sincerely

Aoife O'Flaherty  
60 Swanbrook, Southern Cross Road, Bray, Co. Wicklow.

**Leonora Earls**

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**From:** Vincent O'Halloran [  
**Sent:** 14 September 2017 15:08  
**To:** Planning - Plan Review  
**Cc:** Cllr. Joe Behan  
**Subject:** Bray Municipal District Local Area Plan - Kilruddery  
**Attachments:** Letter to WCC re Draft Plan 2017.docx

Please accept my attached word document which is an objection to the Draft Plan in its current form.

Best wishes,

Vincent and Marie O'Halloran  
9, Earlscroft,  
Southern Cross Road,  
Bray

9, Earlscroft, Southern Cross Road, Bray, Co. Wicklow. A98P520

**To: Wicklow County Council, Planning Department**

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

We wish to object to this plan on the following basis.

1. The effect of additional traffic on the Southern Cross Road.
2. Access to the Southern Cross Road from Earlscroft Estate.
3. The potential for flooding in the areas adjacent to the Southern Cross Road.
4. The environmental impact on a Natural National Amenity, the Sugar Loaf.
5. The lack of public consultation on the draft plan.
6. The potential to use the Agricultural entrance to Kilruddery from Earlscroft Estate.

Sincerely,

Vincent and Marie O'Halloran

(e) \_\_\_\_\_

(m) \_\_\_\_\_



**Lisa Rothwell**

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**From:** Tresi O'Brien  
**Sent:** 15 September 2017 11:26  
**To:** Planning - Plan Review  
**Subject:** FW: Draft Development Plan 2017 - Tree Preservation & Temple Vevay Sportsfield re-zoning

-----Original Message-----

**From:** Tresi O'Brien On Behalf Of Bray Municipal District  
**Sent:** 15 September 2017 10:00  
**To:** Bernadette Harvey  
**Subject:** FW: Draft Development Plan 2017 - Tree Preservation & Temple Vevay Sportsfield re-zoning

Hi Bernadette,

Is there a generic email that I can forward this submission to?

Thanks  
 Tresi

-----Original Message-----

**From:** Patricia and Gary O'Leary  
**Sent:** 14 September 2017 23:35  
**To:** Bray Municipal District  
**Subject:** Draft Development Plan 2017 - Tree Preservation & Temple Vevay Sportsfield re-zoning

Dear Sir/Madam,

1) Under section 4.3.2.4 Trees, of the Bray Municipal District Local Area Plan 2017, the residents of Sugarloaf Crescent wish to apply for a preservation order on the large oak tree in the Vevay Temple Sportsfield, (on the Sugarloaf Crescent side of the field), under Section 45 of the Local Government (Planning and Development) Act 1963 and subsequent acts as amended. Part XIII of the Planning and Development Act 2000, as amended sets out the provisions for TPOs.

2) I also note that the Temple Vevay Sportsfield is being rezoned from OS, Open Space to AOS, Active Open Space. Given that this is a shared Open Space between the Wolfe Tone & District Youth Club and the residents of Sugarloaf Crescent, will this proposed rezoning impact negatively on the residents rights to enjoy this open green space? The residents of Sugarloaf Crescent have an agreement with the WT&DYC, BMD and Lord Meath for access to the field for children to play and for residents to traverse in order to access local amenities. In the circumstances I would ask that the Temple Vevay Sportsfield remain as it is already zoned to protect the long term interests of the residents of the area.

Yours faithfully,  
 Patricia O'Leary  
 Hon Secretary  
 Sugarloaf Crescent Residents Assoc

C234

**Leonora Earls**

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**From:** Stephen O'Leary  
**Sent:** 14 September 2017 15:42  
**To:** Planning - Plan Review  
**Subject:** Bray Municipal District Local Area Plan 2017-2023

Dear Wicklow Co. Council,

My name is Stephen O'Leary. I live with my family in 1 Killarney Glen, Herbert Road, Bray.

My wife Edel and I have reviewed the plans for Bray displayed online and at the public consultation on August 16<sup>th</sup> in the Bray country offices and we would like to make the following observations regarding the development plan.

1) Dargle Walkway

We believe the proposed walkway on the south bank of the Dargle river is not suitable for the area. We have endured the Dargle flood protection works over recent years and now that these are finished we continue to see a lot of anti-social behaviour along both banks of the river. We believe the proposed walkway would become a haven for increasing anti-social behaviour and put the security of our family and property in jeopardy. We, and our neighbours, have called the Gardai on numerous occasions due to this anti-social behaviour. We also feel it will significantly encroach on our privacy as the walkway would be at the end of our garden.

2) Traffic Congestion

It is not clear from the plan what will be done to address the appalling traffic congestion in Bray. This traffic congestion has got much worse over recent years. It has taken me up to 30 minutes to drive down the main street from the town hall to the bridge. It usually take more than 20 minutes to reach the M50 from the main street/Herbert road junction in the mornings. Can you please address this?

Yours Sincerely,

Stephen O'Leary

**Leonora Earls**

---

**From:** Ann O'Mahony  
**Sent:** 14 September 2017 21:50  
**To:** Planning - Plan Review  
**Subject:** Draft Local Area Plan for Bray

To: Wicklow County Council

I wish to make a submission to express my concerns on the Draft Local Area Plan for Bray to rezone part of the Kilruddery Estate on the Small Sugarloaf for housing and industrial use. My concerns are outlined below:

1. Lack of infrastructure to support the proposed housing and additional industry.
2. Further increase in traffic in the area
3. This is an erosion of the natural amenity of the Kilruddery estate.

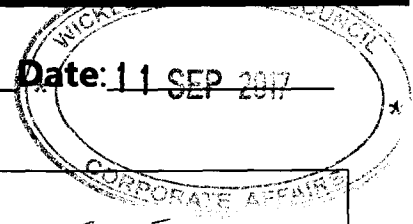
Thank you

Ann O'Mahony  
151 Hollybrook Park  
Southern Cross Road  
Bray

# WICKLOW COUNTY COUNCIL

## Draft Bray Municipal District Local Area Plan 2017

Name/ Organisation: DAVID O'NEILL



MY CONCERN IS WITH REGARD TO THE TRAFFIC CONGESTION WHICH IS ALL READY THERE AND CAN ONLY GET WORSE "YES" I'M TALKING ABOUT THE LIGHTS BETWEEN SUNNY BANK AND OLD CORNER AND FURTHER ON TO WILFORD ROUNDABOUT. I'M ASSUMING THERE'LL BE LIGHTS AT THE JUNCTION AT THE CORCH AND OASES. I'M SUGGESTING THAT SAID LIGHTS BE SYNCHRONIZED AND A STRICT SPEED LIMIT BE APPLIED (CAMERAS AND FINES WOULD BE MY PREFERENCE RATHER THAN SPEED RAMS). MAINTAINED AND MANAGE "VERY STRICT" IT'S TIME TO GET TOUGH ON "SPEED LIMIT BREAKERS."

WHILE I HAVE PCN IN HAND BUT NOT RELATED TO DRAFT PLAN BUT STILL A SERIOUS MATTER THE PAVEMENT OPPOSITE THE ROYAL HOTEL IS A SERIOUSLY DANGEROUS IN THE RAIN FAR TOO SLICK / SLEEK

THANK YOU  
David O'Neill

### YOUR TOWN

- 1. Write to: Bray LAP, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.
- 2. Email to: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

WICKLOW COUNTY COUNCIL  
11 SEP 2017

**Contact Details**

DAVID ONEILL

**Address**

6 FAIR GREEN TCE

BRAY.

C 237

**Leonora Earls**

---

**From:** SANDRA NOLAN [mailto:sandra.nolan@wexfordcoco.ie]  
**Sent:** 15 September 2017 16:55  
**To:** Planning - Plan Review  
**Subject:** Bray MD LAP - Objection to land rezoning - 77 Giltspur Wood  
**Attachments:** 77 Giltspur Wood.docx; 77 GILTSPUR WOOD CONTACT DETAILS.docx

Dear Sir/Madam,

Please find attached letter of objection to the rezoning of land beside Giltspur Wood estate in Bray.

We are residents of Giltspur Wood and have two small children.

Our reasons for objecting are outlined in the attached letter.

Kind regards,

Jonathan and Sandra O'Neill

Jonathan and Sandra O'Neill

77 Giltspur Wood

Bray

County Wicklow

Ref: "BRAY MD LAP"

Dear Sir/Madam

Please find enclosed letter with regards to the rezoning of land beside Giltspur Wood in Bray.

We are opposed to this proposed rezoning for the following reasons:

**Traffic Health Safety:**

Construction traffic throughout the existing estate for the duration of the process.

Increased volume of traffic when new residential site is complete.

The current green areas within Giltspur Wood are used by local residents for dog walking and also as a safe play area by the children in the estate.

The unique feature of Giltspur Wood – i.e. No through roads make this one of the safest estates (residential areas) in Bray for our children to play and we simply wish this to remain for years to come.

**Green Space:**

Loss of current trees and impact on green areas within Giltspur wood which would also be detrimental to local wildlife.

Tree preservation act.

**Heritage Act 1995:**

600 year old protected structure within the area planned for rezoning and new housing.

One of the very few buildings of this type within the Bray area and should be protected at all costs.

On a personal level I would ask the planners to see our reasons for rejection as valid on all fronts, and invite them to walk the estate any evening and see how many children play freely and safely which is unfortunately becoming a rarity in the modern age.

I understand there is national crisis with regards to housing needs, however due to the small number of units planned for this site and multiple areas within the Bray locality that have none of the above outlining reasons to consider, these units should be planned for another site.

Best regards

Jonathan & Sandra O'Neill and children

(Olivia aged 2 and Emilie aged 9 weeks)

77 GILTSPUR WOOD

BRAY

COUNTY WICKLOW

CONTACT DETAILS:

JONATHAN ONEILL

TEL: 01876 411111

SANDRA ONEILL

TEL: 01876 411111



**Leonora Earls**

---

**From:** rebecca o'regan [r]  
**Sent:** 06 September 2017 21:12  
**To:** Planning - Plan Review  
**Subject:** Objection to proposed re-zoning of land in Killruddery  
**Attachments:** Objection of re-zoning.odt

To whom it concerns:

Please find attached my objection to proposed re-zoning of Killruddery lands as per Draft Bray LAP 2017-2023.

Yours sincerely,

Rebecca O'Regan  
2 Earlscroft  
Southern Cross Road  
Bray  
Co. Wicklow

Unable to open attachment,  
sent to IS Support to  
be released.  
R.O.  
7/9/17

6<sup>th</sup> September 2017

Administrative Officer  
Planning Section  
Wicklow County Council  
County Buildings  
Wicklow

2 Earlscroft  
Southern Cross Road  
Bray  
Co. Wicklow

Re: Objection to Draft Plan Bray LAP 2017-2023

I wish to object to the Draft Plan for Bray in regard to the plans for the Killruddery land re-zoning as a resident of the Southern Cross Road.

I object to these plans going forward on the following grounds:

- The impact development of land will have on traffic flow on the Southern Cross Road. In an already congested area what further impact will the development have on existing traffic? The proposal should mean a further possible 450 plus cars will be using the existing road.
- Impact on environment.
- Lack of public transport for the Southern Cross Road.
- Lack of infrastructure and soft infrastructure. What impact will planning have on lighting, sewage, waste and water?
- No suitable entrance/access to proposed development. How will the developments be accessed?
- Loss of view aspects and privacy for existing residents.
- Destruction of a natural amenity.
- Very poor services and facilities exist already on Southern Cross Road. Adding development will increase need for these services which have been promised for years but never came to fruition.
- Additional flooding of land in Hollybrook Park and elsewhere.
- Protection of a natural amenity for public use.
- Building of 240 houses in the position on the plan as unsuitable position.
- Use of re-zoning for employment purposes. This will add again to congestion on the road, with both employees and transport of goods to proposed site.
- The Killruddery Estate is an Area of Outstanding Natural beauty. It is also important in regard to cultural heritage and historic importance.
- Lack of social, community and cultural facilities.

I believe that the re-zoning plan will have a detrimental effect on the area and therefore I vehemently oppose the re-zoning plan for Killruddery lands.

Yours sincerely,

Rebecca O'Regan.

C239

**Leonora Earls**

---

**From:** Carol Ormon  
**Sent:** 15 September 2017 16:41  
**To:** Planning - Planning and Development Secretariat  
**Subject:** Oldcourt Zoning[2305843009213869033].pdf  
**Attachments:** Oldcourt Zoning[2305843009213869033].pdf

Sent from [Mail](#) for Windows 10

Carol Ormon

14/09/17

102 Giltspur Wood

Bray, Co Wicklow

Administrative Officer

Planning Section

Wicklow County Council

Station

WicklowTown

Re: BRAY MD LAP

I wish to object to the proposal to build a residential development on Oldcourt lands, adjacent to Giltspur Wood.

The proposal envisages that all construction traffic and subsequent residential traffic would proceed through Giltspur Wood, a small quiet estate of cul de sacs. This would significantly change the quiet, safe nature of the estate and devalue our property.

There would be a loss of green space in Giltspur Wood and in the adjoining lands where there is a several hundred year old protected structure.

The Swan River Valley has an amenity value as well as providing safe management of surface water which is directed into this area. There was significant flooding by surface water in Giltspur Wood several years ago which blocked the main estate road and went up to the door of the nearest houses. The loss of trees and hedgerows along with added building could see a return of this problem.

Instead of further construction, the Council should be thinking of developing the Swan River valley as an amenity to the community by constructing a walk and bike path corridor, preserving the trees and greenery, providing safe habitat for a variety of wildlife, safeguarding safe surface water drainage, and contributing to the social, mental and physical health of the community.

Thank you,

Carol Ormon

C240

DEIRDRE O'ROURKE

55 Giltspur Wood, Bray, Co. Wicklow

Tel: 1

Please find submission letter regarding the proposed rezoning of land beside Giltspur Wood, Bray:

Ref: "BRAY MD LAR"

From:

Deirdre O'Rourke

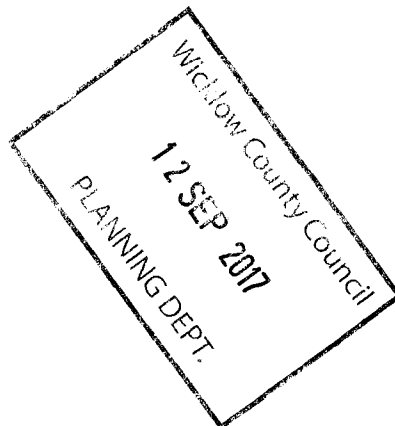
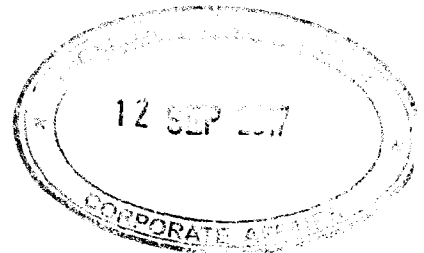
55 Giltspur Wood

Bray

Co. Wicklow

Tel: 1

Email: [redacted]



# DEIRDRE O'ROURKE

55 Giltspur Wood, Bray, Co. Wicklow

E \_\_\_\_\_  
Tel: \_\_\_\_\_

Administrative Officer  
Planning Section  
Wicklow County Council  
Co. Wicklow

10<sup>th</sup> September 2017

Dear Sir/Madam,

**RE: Proposed Rezoning of land beside Giltspur Wood, Bray (REF: 'BRAY MD LAP')**

My name is Deirdre O'Rourke and I live in 55 Giltspur Wood. I have been resident in the estate since 1999 and live facing Oldcourt Castle and the land proposed for rezoning.

I like all my neighbours, am deeply shocked by the Council proposal to rezone this land and ask has it really been given proper consideration. There are a number of areas which would create problems:

- **Traffic Congestion:** Exit from Giltspur Wood to the bottleneck of Bray/Motorway is already a daily nightmare with people trying to get to work experiencing severe delays each morning as they join the one way system, all exiting by the very slow lights at Killarney Road. The newly built Castlelynn estate has just recently added to this, and now there are intentions to further exacerbate it again. This is not fair to residents.
- **Parking, volume of Traffic and Safety of Children:** Giltspur Wood, like a lot of estates in Bray was not built to cope with the amount of vehicles per property. A high level of rental properties, adult children not being able to afford to move out and double working parents necessitating two vehicles has added to this in recent years making for high volumes of traffic in and out of estate and over-subscribed on road parking for these vehicles. My daughter can't park outside my own house as vans from rental houses park at the side of the house opposite, and to do so would hinder vehicles from the back of the estate to actually leave the estate. Modern estate planning never looks at these parking issues and they are the same in any estate. Furthermore, the mouth of the estate is not wide enough for two cars to enter and leave at the same time and this is a continual accident risk. All these factors cause a huge danger to the safety of small children playing outdoors and it would be detrimental to deliberately add further to it. Children in Giltspur Wood do what we all aspire children to do and play outside, football on the greens, cycling and scooters on the pathways. Higher levels of estate traffic and parking and the initial construction traffic will just compromise their safety immensely, particularly during construction time, forcing them to stay inside stuck in front of the xbox etc. It is completely unfair to compromise the children's safety and limit their ability to play outdoors as children should be allowed to
- **Disregard of Historical Castle and woodland river setting:** These are all practical issues, but what dismays me most is how the Council that represents us the people of Wicklow, the garden county of Ireland, could even consider destroying the historical beauty of Oldcourt

castle by turning it into a building site, all for the sake of ten extra housing units. This is a national historical structure, it dates back to Norman times, it represents periods of history our children are studying in school. And you are actually considering defacing it for the sake of ticking a box to add a few houses. And what about all the woodland and trees and natural habitat that lives in there. Why are you so headstrong on destructing this beauty instead of investing in preserving the beauty of the nature and history and develop the site as the originally planned swan walk incorporating a walkway from one side of the town to the other so everyone can enjoy its beauty.

- Who will gain from all this destruction and loss of safety? As newly built houses around the corner are currently selling for over 400,000 euro, these are hardly going to be priced any differently. Once rezoned and whether it is houses or apartments that are then approved, the only people that will make money will be the developers and the subsequent landlords. So the council are just being very short-sighted if they think this build is going to alleviate homelessness or offer any opportunity to first time buyer families. Residents in Giltspur Wood will be severely compromised with traffic access and their children exposed to so many safety risks while a beautiful historical castle in a nature habitat is destroyed just to tick a few boxes. Shame on you Planners in Wicklow County Council if you even consider this rezoning.

Yours sincerely,



Deirdre O'Rourke  
Resident of Giltspur Wood



C241

**Leonora Earls**

---

**From:** Paul Turley [mailto:pturley@johnspainassociates.com]  
**Sent:** 15 September 2017 14:29  
**To:** Planning - Plan Review  
**Cc:** John Spain  
**Subject:** BRAY MD LAP (Draft Bray Municipal LAP 2017-2023)  
**Attachments:** 15024 - Draft Bray LAP Submission Final.pdf

**Importance:** High

Dear Sir / Madam,

On behalf of our client, Park Developments Group, The Herbert Building, The Park, Carrickmines, Dublin 18, please find attached a submission on the Draft Bray Municipal District Local Area Plan 2017-2023 in respect to their lands at the Former Dell Site situated on Vevay Road and Boghall Road, Bray.

We would be grateful if you could confirm receipt of this submission by return email.

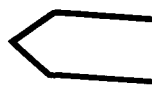
Kind regards,

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**Paul Turley**, *Executive Director*,  
John Spain Associates,  
39 Fitzwilliam Place,  
Dublin 2,  
D02 ND61.

T: 01 662 5803  
M: 087 991 3162  
e-mail: [pturley@johnspainassociates.com](mailto:pturley@johnspainassociates.com)  
web: [www.jsaplanning.ie](http://www.jsaplanning.ie)

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

15<sup>th</sup> September 2017

Dear Sir / Madam,

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

**1.0 INTRODUCTION**

- 1.1 On behalf of our client, Park Developments Group, The Herbert Building, The Park, Carrickmines, Dublin 18, we wish to make a submission on the Draft Bray Municipal District Local Area Plan 2017-2023 as it relates to their lands at the Former Dell Site situated on Vevay Road and Boghall Road, Bray.
- 1.2 The Draft LAP includes a Mixed Use zoning on the subject lands with a Specific Local Objective 4(SLO 4), which our client welcomes, as it provides the opportunity to bring forward the regeneration of the subject lands, which have remained derelict since the early 2000's, for a mix of residential and employment uses.
- 1.3 However, prior to adoption of the new LAP we would request the Planning Authority to consider some minor amendments to the SLO 4 objective for the subject lands, to ensure an appropriate range of residential, employment (including those with community and social benefits) and ancillary uses are provided for in any future redevelopment of the subject lands.
- 1.4 It is respectfully submitted that due to SLO 4 permitting residential and modern format office use only, that this could have implications in respect to the viability of delivering the much needed regeneration of the Former Dell Site. In this regard, this submission requests that due consideration be given to also including a nursing home, health centre, and ancillary uses such as café or shop, as additional employment generating uses, which also offer community and social benefits, appropriate under the Specific Local Objective 4 relating to the subject site. The rationale for the requested amendments to the Draft LAP is set out below.

**2.0 DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023**

- 2.1 The lands which are subject of this submission are located within the administrative boundary of the Draft Bray Municipal District Local Area Plan 2017-2023 which has been prepared in accordance with the requirements of the Planning and

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

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



Development Act 2000 (as amended) and in the context of the Wicklow County Development Plan 2016-2022 and the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022.

### Vision

- 2.2 The Strategic Vision of the Draft MD LAP is *“for the Bray Municipal District to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.”*

### SLO 4: Former Dell Site, Vevay Road – Boghall Road

- 2.3 The site the subject of this submission is zoned for Mixed Use development, subject to a specific local objective - SLO 4, as identified in Figure 1 below. The lands measure approximately 3.75 hectares in area. The site was formerly occupied by the computer company, Dell, and has been vacant for some years. The site is occupied by a large manufacturing building and surrounding grounds and car parking. Thus, the proposed Mixed Use zoning objective is welcomed as it provides the potential for the viable regeneration of the site for residential and employment use.

**Figure 1: SLO 4 – Former Dell Site, Vevay Road – Boghall Road**



- 2.4 In respect to the subject lands, the Draft MD LAP states the following, *“given that this site is surrounded by both residential and employment uses, it is considered that a mixed high intensity employment and residential scheme would be suitable on these lands, in accordance with the following criteria:*



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

2.5 Overall, this submission welcomes the proposed mixed use zoning objective as it provides the opportunity for a comprehensive redevelopment of the site to be delivered in accordance with the requirements of the Draft LAP.

2.6 As the Planning Authority will be aware our client has significant experience of delivering both residential and office developments in the Greater Dublin Area. Some recent residential schemes of note include Diswellstown in Dublin 15 and Clay Farm in Dublin 18. Recent office schemes include The Reflector at Hanover Quay, Dublin 2, and Block 90 in The Park, Carrickmines.

**Block 90, The Park**



**The Reflector, Hanover Quay**



2.7 The above reflect our client's significant recent experience in the residential and commercial sectors. In this respect our client has concerns about the viability of delivering 20,000 sq.m of modern office format floorspace on the subject site. It is considered that greater flexibility under SLO 4 is required, for example broadening its scope so as other employment uses such as a nursing home or health centre are provided for in addition to modern format office use. The client considers that a more realistic target for the site could be 10,000 sq.m of office floorspace and c. 10,000 sq.m of nursing home and health centre floorspace.

2.8 Having regard to the above, it is respectfully submitted that SLO 4, which restricts the employment use to 'modern office format' or c. 20,000 sq.m, is overly prescriptive and will be difficult to deliver in this location.

2.9 Thus, the limitation on the type of employment use may have implications in bringing forward the much needed regeneration of the site, including employment generating uses. In this respect, it is respectfully requested that other employment



related uses, such as a nursing home or health care facility, which would also bring community and social benefits to the area, should be facilitated under the SLO 4 objective. Such uses would be appropriate in the context of the Mixed Use zoning objective, and would not have implications for other mixed use zoned sites within the LAP area, as the amendments requested below only relate to SLO 4 and the fact that the LAP states that *'uses generally appropriate for any mixed use area will be specified in the plan.'*

- 2.10 As discussed in the following section, it is requested that 'Nursing Home' and 'Health Centre' be included as potential employment generating uses under the SLO 4 objective relating to the former Dell Site. It is respectfully submitted that a Nursing Home is a particularly appropriate use for the subject site as it would provide significant employment, community and social benefits for the area. There is also a recognised need for modern nursing home accommodation in Bray.

### 3.0 **REQUESTED AMENDMENTS TO THE DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2017-2023**

- 3.1 Having regard to the above, it is respectfully submitted that an amendment to the Draft Bray Municipal District Local Area Plan 2017-2023 be considered by the Planning Authority. The following sets out the requested amendments to the Draft LAP and the rationale for the same.

#### ***Specific Local Objective – Former Dell Site, Vevay Road – Boghall Road***

- 3.2 It is respectfully submitted that the specific local objective for the Former Dell Site on Vevay Road and Boghall Road should be amended to include nursing home and health centre use as other forms of employment generating uses, in addition to the office, and which would be complementary to the proposed residential use. The following sets out the request amendments to the text (bold and underlined) in the Draft LAP relating to SLO 4, which we ask the Planning Authority to consider:

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

- *The development shall be delivered a high density format and in particular, shall have a plot ratio of not less than 1:1. Development of up to 4 storeys may be considered;*
- *The employments element shall be in modern office format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1 plot ratio, a total employments floor space yield of at least 20,000sq.m is desired;*
- ***A nursing home and / or health care facility will also be considered to meet a portion of the employment floorspace requirement on site;***
- ***In addition small scale ancillary uses such as restaurant/café or shop may be required to serve and complement the employment and residential uses;***
- *Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sq.m)*
- *Any planning application shall include a detailed phasing programme that ensure the timely delivery of all elements of the SLO. In order to 'kick start' the development, a first phase of housing, comprising not more than 50% of the*



*total housing programme, may be developed as a 'Phase 1' of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the employment element". (Requested amendments in bold and underlined)*

- 3.3 A nursing home facility is considered to be a suitable use for the site as it would provide significant employment opportunities for the locality and also act as a community use.
- 3.4 Our client has been approach by a nursing home operator who is interested in developing a facility on the subject site. As the Planning Authority may be aware, our client recently secured planning permission for a 224 no. bed Nursing Home facility, in a part 3, part 4, part 5 storey development, at Leopardstown Valley Neighbourhood Centre, Ballyogan Road, Dublin 18 under Reg. Ref.: D16A/0452 (Dun Laoghaire Rathdown County Council). The nursing home has a GFA of c. 12,600 sq.m of floorspace including basement car park. An image of the proposed high quality facility is included in Figure 2 below.
- 3.5 The permitted nursing home facility at Leopardstown Valley is expected to create 180-195 direct full and part time jobs, based on information provided by the proposed operator of that facility. Such a facility will also generate significant indirect employment for healthcare consultants and services. It is considered that the Former Dell Site is suitable to accommodate a similar scale of facility.

**Figure 2: CGI of the Permitted Nursing Home Facility, Leopardstown Valley, Ballyogan Road**



- 3.6 Thus, it is respectfully submitted that a nursing home development on the subject site could create in the order of 175 direct jobs and indirect jobs. In addition it is considered that a health centre would be a complimentary use to a nursing home and as both are employment generating uses, the Planning Authority should consider amending the SLO 4 objective to provide the opportunity for such development on the former Dell Site. Such uses are likely to be more viable in this location in the short to medium term and provide greater flexibility for the



developer. In this respect it is requested that the employment use under SLO 4 is extended beyond the modern office format of c. 20,000 sq.m provided for in the Draft LAP.

- 3.7 Nursing home use is considered to be appropriate for the subject site as there is a recognised shortage of good quality elderly care facilities nationally and in the Bray area. The inclusion of nursing home as a potential employment use on the subject site would support the Government's five year plan for investment in the replacement of existing public nursing homes, as issued in 2016. In addition, there is a recognised need to support this Government investment with the delivery of good quality nursing home facilities in appropriate locations by the private sector. The proposed development would also help meet the need for elderly care in this area of Bray. This would also in turn potentially free up larger family homes in established residential areas of Bray for sale to younger members of the community.
- 3.8 It is also considered that small scale ancillary uses such as restaurant/café and shop, should be permitted under SLO 4, as they would complement the residential, office, nursing home and health centre uses, which are requested. They would also help provide for streetscape activity in key locations and would comply with the employment generation requirement of the Mixed Use zoning and more specifically SLO 4.
- 3.9 The developer is committed to providing a modern office and residential development on the subject lands, however, it is submitted that greater flexibility in respect to how the c. 20,000 sq.m of employment use could be delivered on the site is required, for example by facilitating a nursing home and health centre use of c. 10,000 sq.m.
- 3.10 It should be noted that the proposed amendment only relates to the lands on SLO 4 and the subject site, and therefore would not have any material implications for other Mixed Use zoned lands within the LAP area.

#### **4.0 SUMMARY AND CONCLUSIONS**

- 4.1 This submission is made on behalf of our client, Park Developments Group, in relation to their landholding at the Former Dell Site, Vevay Road – Boghall Road which is subject to a Mixed Use zoning and specific local objective SLO 4 in the Draft Bray Municipal District Local Area Plan with a.
- 4.2 Our client is supportive of the Draft LAP and the land use zoning proposed for the subject lands, as it provides a more suitable planning framework which will help realise the regeneration of the site for residential and employment uses.
- 4.3 However, it is respectfully requested that the Planning Authority should consider amending the wording of SLO 4 relating to the Former Dell Site on Vevay Road and Boghall Road, so that it includes nursing home and health centre uses as other forms of employment generating uses which are appropriate for the site, in addition to the modern format office use provided for in the Draft LAP. These additional uses would also deliver community and social benefits for the area and there is a recognised need for modern nursing home accommodation in the area.
- 4.4 The requested amendments to the Draft LAP, and rationale for same, have been set out in Section 3 of this submission. We respectfully request that this submission

be taken into consideration during the preparation of the proposed amendments to the Draft Bray Municipal District Local Area Plan 2017-2023.

- 4.5 Our client would be happy to meet with you to discuss the subject site if considered necessary.

Yours faithfully,



---

John Spain Associates