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Bray Environs Local Area Plan 2009-2015

The Proposed Bray Environs Local Area Plan, 2009-2015 is set out in 2 parts:

PART A: Part A consists of a description of the process involved in the preparation and making of the Plan, including the statutory basis, details of the consultation process, as well as the basis of and calculations for zoning. This part of the document is to enable an understanding of the basis of the assumptions and recommendations made in the Plan. This section will not form part of the final published Plan.

PART B: Part B is the Proposed Bray Environs Local Area Plan, 2009-2015.

While Part A will not be published once the Plan has been adopted, it will be available on the Wicklow County Council website, or at the Planning Office, for those who wish to further understand the process behind the Plan.



Prepared by Wicklow County Council, Forward Planning, Geographical Information Systems and Information Technology Sections in conjunction with CAAS (Environmental Services) Ltd and Tiros Planning, Sustainable Development and Landscape Consultants.

1.0 PURPOSE OF THE PLAN

Bray is designated by the Regional Planning Guidelines for the Greater Dublin Area (RPG^s) 2004-2016 as a Metropolitan Consolidation Town within the Metropolitan Area of Dublin and, together with Greystones/Delgany, forms a Primary Development Cluster. As such, Bray is envisaged to potentially develop to a relatively large scale. In terms of its role and potential for future growth, the RPG^s have identified Bray as being comparable to Swords in Fingal, Dundrum in Dun Laoghaire-Rathdown, and Naas in Co. Kildare. The Wicklow County Development Plan (CDP) Settlement Strategy, in accordance with the provisions of the RPG^s, has designated Bray as a Metropolitan Consolidation Town.

The growth of Bray, however, is constrained by a lack of available land, as is evidenced by the limited population growth of the town of 3.9% between 1996 - 2002 and 3.0% between 2002 and 2006. Accordingly, to achieve its designated status, the majority of the future growth of the town will have to be accommodated in the Environs area, and this growth will only be achieved by zoning additional lands. Therefore, the Environs area has a key part to play in the continued growth and development of Bray as a Metropolitan Consolidation Town, and in its role as a Primary Development Cluster.

With the selection by the rail Procurement Agency of a preferred route for the LUAS B2 line into Bray and Fassaroe a new impetus has evolved for the crafting of a new strategy and plan for the Bray Environs area.

The purpose of this Draft Local Area Plan (LAP) is to establish a framework for the proper planning and sustainable development of the Environs of Bray commensurate with it's designation as a Metropolitan Area Settlement. In accordance with such a designation, it is planned that the town be developed to a relatively large scale as part of the strategy for the consolidation of the Metropolitan Area. With the adoption of the Planning and Development Act, 2000 sustainability has been recognised as the principle of planning policy in Ireland. It envisages the balancing of economic, social and environmental components in order to maintain and develop a high quality of life for all stakeholders, without compromising the protection of the environment and the needs of future generations. The Local Area Plan and the future growth of the environs area will be guided by these principles.

It is envisaged that the LAP shall facilitate the development of the Bray Environs, thereby enhancing the role and opportunities of the greater Bray area in a balance manner without comprising the protection of the environment and the need of future living and working population of the area.

The Bray Local Area Plan will seek to:

- Provide a coherent and robust framework for the extension of Bray.
- Enhance the economic, social and environmental offer of Bray and its environs.
- Provide the framework to enhance the employment opportunities of the greater Bray area and north Wicklow.
- Provide direction and guidance for the integration of a range of new uses.
- Address the deficiency in open space and recreation provision in the town.
- Strengthen the spatial linkages between Bray and its environs.
- Provide an integrated approach to land use and transportation.
- Provide guidance for the integration of the natural and built environment and
- Provide an implementation strategy.

The Bray Environs Local Area Plan, in conjunction with the relevant policies and objectives set out in the Wicklow County Development Plan, is the main instrument to guide and control development in the area and thus has major implications on the future growth and development of Bray and the Plan area.

This Draft Local Area Plan has been prepared in accordance with the requirements of the Planning and Development Acts 2000-2007. Part II, Chapter II, Section 19 of the Act, provides that a LAP may be prepared in respect of any area which a planning authority considers suitable; and in particular for areas which require economic, physical and social renewal and for areas likely to be the subject of large scale development within the lifetime of the Plan.

The Bray Environs LAP will be valid for a period of 6 years from the date of its adoption by the County Council. It is intended that the long-term vision set out will give a degree of continuity and certainty to the future development of the Plan area.

2.0 LOCAL AREA PLAN STATUS & PROCESS

Part II, Chapter II, Section 19 of the Planning & Development Act 2000, as amended, provides that a Local Area Plan (LAP) may be prepared in respect of any area which a planning authority considers suitable; and in particular for areas which require economic, physical and social renewal and for areas likely to be the subject of large scale development within the lifetime of the Plan.

The Planning & Development (Amendment) Act 2002, (Section 8) indicates that a LAP may include specific objectives pertaining to the zoning of the land. These objectives must be consistent with the County Development Plan. Once the Draft Plan is prepared, notice of the intention to make the proposed LAP will be advertised in one or more newspapers circulating in the area. Information will also be disseminated through the public counter, the website and by phone. The statutory timeframe, as set out in the Planning & Development Acts, commences upon the publication of the notice that the Planning Authority proposes to make, amend or revoke a Local Area Plan.

Table 1 Statutory LAP Preparation Process

Timeframe	Statutory Process
Week 1	Draft Local Area Plan on display - submissions invited
	Minimum 6 weeks
Week 6	Preparation of Manager's Report on submissions received
	Maximum 6 weeks
Week 12	Manager's Report given to Council Members for consideration
	Maximum 6 weeks
Week 18	Plan made unless Council Members decide to not make it, or vary or
	modify it, in which case the modifications must be advertised within
	3 weeks
Week 21	Modifications on display and submission invited
	Minimum 4 weeks
Week 25	Preparation of Manager's Report on submissions (modifications only)
	Maximum 4 weeks
Week 29	Manager's Report given to Council Members for consideration
	Maximum 6 weeks

Week 35	Plan made by Council Members as per Manager's recommendation			
	with or without modifications			

The Draft Local Area Plan has been prepared in accordance with the requirements of the Planning and Development Act, 2000, as amended. The Bray Environs LAP shall be valid for a period of 6 years from the date of its adoption by the County Council, unless amended or revoked within that period. It is intended that the long-term vision articulated by the Plan will give a degree of continuity and certainty to the future development of the Plan area.

3.0 PUBLIC CONSULTATION

In late 2007 and early 2008, pre-Draft public consultation took place. A Background Issues Paper was published and submissions were invited from the public from 12 December 2007 to 24 January 2008. A Public Consultation Meeting was held on the evening of 7 February 2008 in the Royal Hotel in Bray. The issues raised in the submissions received and at the public meeting have been taken into consideration in preparing the draft LAP.

Pre-draft submissions were received from:

- 1. Lennox Estates on behalf of Mr. & Ms. Somerville;
- 2. Murray O'Laoire Architects on behalf of the Brabazon Family;
- 3. RPS Planning & Environment on behalf of Cosgrave Property Developments Ltd.;
- 4. John Spain & Associates on behalf of the Legionnaires of Christ;
- 5. John Spain & Associates on behalf of John Ronan, Treasury Building, Lower Grand Canal Street, Dublin 2;
- 6. Murray O'Laoire Architects on behalf of Roadstone;
- 7. PD Lane & Associates on behalf of Gareth Murphy and Seamus Tighe;
- 8. Clodagh Holmes on behalf of Greenstar Ltd.;
- 9. Ian Magahy & Associates and David Pym & Associates on behalf of Annie Verwijs, Kilcroney Furniture Ltd.;
- 10. Ian Magahy & Associates and David Pym & Associates on behalf of Nixdorf Family;
- 11. Stephen Little & Associates on behalf of George Wilkin, 1 Roselawn Drive, Bray;
- 12. Derek Mitchell, Member of Wicklow County Council.

Headline Issues

A summary of the main planning issues raised in the submissions made on the Issues Paper and at the public consultation meeting include:

Residential Development/Population

 Concern raised over projected population increase and the impact on existing infrastructure.

Traffic and Transportation

- Demand for formalised walking routes across the area.
- Opportunity to link recreational walking with public transport.
- Need for a large scale Park & Ride facility at LUAS.

- Need for integrated cycle infrastructure in Bray.
- Issues raised in relation to connectivity to Bray urban area in terms of public transport / pedestrian ways etc.
- Questions raised in relation to proposed route of LUAS and what types of development will be located on these areas.
- Concern raised on impact on N11 traffic and Bray urban area.
- Will the existing junctions onto the N11 be altered?
- The Herbert Road junction must be kept open.
- The new pedestrian bridge across the N11 is worthless as no footpath is provided from it to the Herbert Road.

Social and Community

- Coláiste Raithin (secondary school) needs a new school site as, at its current location, there is no room for expansion.
- Funding is available from the VEC but there is no suitable site.
- Pizarro site is earmarked for Coláiste Raithin, but representatives are not entirely happy with the site, as they would have to share it with a primary school and the site is considered too small to allow future expansion; also, the availability of the Pizarro site is not yet certain.
- New school site could be provided in Bray Environs, as no sites are available within the Town Council area.
- Coláiste Raithin is looking for alternative temporary accommodation until a new secondary school is built.
- Need to integrate the landscape as a resource and amenity for the population of Bray and the wider area was seen as very important and a great opportunity.
- Need for large urban park for the Bray area.
- LAP should look at landscaping issues as well as planning and urban design. An
 objective should be included which details landscaping requirements in the
 overall plan area.

Natural & Built Heritage

- Concern about development of Kilruddery lands (to the south of Deepdales housing estate).
- There is a need to balance the protection of Kilruddery Demesne with some limited development in order to finance its upkeep, and maintain the integrity of the estate. The current vision for the estate has changed since the previous presentation to the Council in 2006.

Retail

• The retail function at the centre of Bray must be protected. Only small scale convenience outlets should be permitted (with the exception of Fassaroe).

Greenstar Facility

- The Greenstar facility has operated successfully even though there are existing residents adjoining the facility, who have not objected to any planning applications to date. This was due to successful consultation. Greenstar are worried that new zonings in the area will introduce many new residents, which will potentially hinder the operation of the facility.
- It is the intention of Greenstar to have all operations indoors.

- The existing zoning of the facility should be protected, and possibly a buffer introduced to ensure that new residents are not directly adjoining it.
- The existing zoning should allow Greenstar to develop offices on the site (for their own needs).

General

- Pocket of land (residential zoning) to the west of the Bray Town Council area is left isolated between Bray urban area and Dun Laoghaire - lands should be included in Plan area and re-zoned to allow for development.
- Queried whether plan can include lands to south of Bray urban area. Can existing industrial lands be expanded within scope of plan?
- What is the current status of the pNHA and cSAC when are they likely to become actual designations?

4.0 DEVELOPMENT MANAGEMENT

As this Plan must conform to the policies and objectives of the County Development Plan, it is not proposed to include a repetition of the policies, objectives or strategies as set out in the County Plan. Where standards or objectives for a particular development are not included in this plan, the provisions of the County Development Plan shall apply. The LAP will however include appropriate specific development objectives and guidance, compatible with those of the County Development Plan, to assist the Development Management process in managing sustainable progress for the environs of Bray town.

Having regard to the capital expenditure required to adequately provide for Roads and Transportation, and Environmental and Community Facilities Infrastructure, the Council will require contributions from benefiting developers. Contributions shall be made in accordance with Wicklow County Council's Development Contribution Scheme. In addition, Wicklow County Council will continue the practice of granting planning permissions with the inclusion of conditions requiring levies and/or bonds to be paid and/or works undertaken to facilitate developments in the interests of the common good.

5.0 STRATEGIC ENVIRONMENTAL ASSESSMENT

5.1 SEA Introduction and Legal Framework

The Strategic Environmental Assessment (SEA) process is the formal systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme. SEA informs plans of the environmental impacts of alternative actions and contributes to the integration of environmental considerations into plan making.

On the 21 July 2004, the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) was transposed into Irish law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436 of 2004). Relevant 'Guidelines for Planning and Regional Authorities' were subsequently issued by the Minister for the Environment, Heritage & Local Government in November 2004. As the population within the plan area is less than

10,000, it is a requirement that the County Council undertakes a 'screening' of the plan in respect of SEA.

5.2 The SEA Screening Process

Screening, evaluating whether SEA needs to be carried out, was undertaken for the Bray Environs Plan. In line with the SEA Regulations, screening was carried out by Wicklow County Council. The plan will provide for a resident population of circa 7,000 persons and a working population in excess of 16,000 persons. Taking into account the populations to be provided for, the Council determined that implementation of the plan would be likely to have significant effects on the environment thereby making it necessary to carry out a full SEA in accordance with the regulations.

5.3 The SEA Scoping Process

Scoping consultations were held with the Environmental Protection Agency (EPA); the Department of the Environment, Heritage and Local Government (DEHLG); and the Department of Agriculture, Fisheries and Food.

Scoping facilitated the selection of issues relevant to the environmental components which are specified under the SEA Directive - biodiversity, fauna, flora, population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, and landscape.

The most important strategic environmental issues relating to the Fassaroe area were identified as follows:

- The existence of areas where known landfilling activity was carried out at the northern boundary of the area.
- An area of sloping land in north of Fassaroe which is visually prominent.
- Three entries to the Record of Monument and Places (RMP) are located within
 the Fassaroe area including Fassaroe Castle which was built in 1536. This
 suggests there may be other archaeological sites which could possibly be
 uncovered in the development process, especially as this is a greenfield site.
 Structures, including their curtilage, which have been protected for architectural
 reasons are also located within the Fassaroe area and
- Development in Bray Environs would lead to an increase in traffic and associated emissions. Noise radiating from the N11/M11 and Roadstone is also an issue.
- The main channel of the Dargle River is designated as a salmonid watercourse.

The most important strategic environmental issues relating to the Kilruddery area are identified as follows:

- Certain lands in Kilruddery area which are located within an Area of Outstanding Natural Beauty and are adjacent to an area under consideration for a Special Amenity Area Order are visually prominent making them sensitive to development and
- The cultural heritage and historic importance of Kilruddery Estate could be cumulatively diminished by the continual selling of land facilitated by rezoning.

Common to both Fassaroe and Kilruddery is the need to provide energy, transport, wastewater collection and wastewater treatment infrastructure in a timely and sufficient manner.

5.4 The SEA Environmental Report

In the SEA Environmental Report, which is placed on public display alongside the Draft Plan, the likely environmental effects of the Draft Plan and the alternatives are predicted and their significance evaluated with regard to the environmental baseline. The Environmental Report provides the decision-makers, the Elected Members of Wicklow County Council, who decide whether or not to adopt the Draft Plan, as well as the public, with a clear understanding of the likely environmental consequences of decisions regarding the future accommodation of growth in Bray Environs. Mitigation measures to prevent or reduce significant adverse effects posed by the Plan, or to maximise any benefits arising, are recommended.

5.5 Appropriate Assessment Screening

Under the ruling in Case 418/04 EC Commission v Ireland, it was found that Ireland had not correctly transposed and implemented the Habitats Directive 92/43/EEC by not providing explicitly for 'appropriate assessment' of land use plans. This judgment is expected to require legislative change to complete the transposition of the Habitats Directive and the Birds Directive 79/409/EEC.

One of the implications of the ruling is that any draft land use plan (development plans, local area plans, regional planning guidelines, schemes for strategic development zones) or amendment/variation to it proposed under the Planning and Development Acts 2000-2007 must be screened for any potential impact on areas designated as Natura 2000 (normally called Special Areas of Conservation (SACs) or Special Protection Areas (SPAs)). This screening should be based on any ecological information available to the planning authority and an adequate description of the plan and its likely environmental impacts. This should take into account any policies that will set the terms for future development. The results of the screening should be recorded and made available to the public.

In any case where, following screening, it is found that the draft plan or amendment may have an impact on the conservation objectives of a Natura 2000 site or such an impact cannot be ruled out, adopting a precautionary approach:

- An appropriate assessment of the plan must be carried out; and
- In any case where a strategic environmental assessment (SEA) would not otherwise be required, it must also be carried out.

The Draft Bray Environs LAP has undergone appropriate assessment screening and it has been concluded that the draft plan has been formulated to ensure that uses, developments and effects arising from permissions granted on the basis of this draft Plan (either individually or in combination with other plans or projects) shall not give rise to significant adverse impacts on the integrity of any Natura 2000 sites¹. This reflects the integration of sensitive and appropriate mitigation measures throughout Plan writing which influenced the pattern of land use zoning as well as particular policies and objectives. The results of the appropriate assessment screening have been recorded and are available to the public.

(b) imperative reasons of overriding public interest for the plan to proceed; and

¹ Except as provided for in Article 6(4) of the Habitats Directive, namely there must be:

⁽a) no alternative solution available;

⁽c) adequate compensatory measures to ensure that the overall coherence of Natura 2000.

6.0 LOCATION & PLANNING CONTEXT

6.1 Location

The Plan Area covers approximately 1,100 hectares to the south and west of Bray Town. The area includes Fassaroe to the west, Cookstown, Kilcroney, Giltspur, Wingfield, Kilruddery Demesne, Belmont Demesne and Ballynamuddagh. It also includes a number of environmental designations. The Plan shall have effect within the development boundary set out in Map 2.

The Plan Area is strategically located in terms of public and private transport networks, both existing and planned. This strategic location has important connotations for the sustainable development of the areas identified within the Plan for future growth.

6.2 National and Regional Policy Context

National Development Plan, 2007 - 2013

The National Development Plan (NDP) is an investment plan, which outlines the Government's approach to growth and development on a national level over the 6-year period.

The population and economic growth experienced by the Greater Dublin Area over the last number of years is recognised as having been dramatic. While the emergence of a critical mass is important to ensure a sustainable form of development, it can also lead to other challenges, such as those now experienced in the Dublin Region and its immediate hinterland. In particular, the focus of population around the region's economic core has led to intense pressure on the region's infrastructure, including traffic congestion, the need for extensive commuting, and increased pressure on the environment. Balanced regional development is central to the strategy and the focus of investment and future development will be based on the hierarchy of settlements proposed in the National Spatial Strategy.

National Spatial Strategy 2002-2020

The National Spatial Strategy (NSS) is a 20-year planning framework designed to achieve a better balance of social, economic, physical development and population growth between the regions. Its objective is to improve the effectiveness of public investment in infrastructure and other relevant services around the country.

The NSS recognises the pivotal role of the Greater Dublin Area to the overall economic wellbeing of Ireland and provides for the majority of future population increase to be accommodated within existing settlements.

Bray is located within the Metropolitan Area of the Greater Dublin Area (GDA). It is a key policy of the NSS to physically consolidate the Dublin Metropolitan Area, supported by effective land use policies and an effective public transport system.

The NSS states that sustainable provision of housing in urban areas involves:

• Concentration of development in locations where it is possible to integrate employment, community services, retailing and public transport.

- Mixed-use and well-designed higher density development, particularly near town centres and public transport nodes.
- The efficient use of land by consolidating existing settlements.

Regional Planning Guidelines for the Greater Dublin Area

The settlement strategy of the Regional Planning Guidelines (RPGs) divides the Region into two areas: the Metropolitan Area and the Hinterland Area.

The strategy for the Metropolitan Area is to consolidate the urban centres, and the provision and facilitation of an integrated public transport system.

The strategy for the Hinterland Area focuses on the development of selected large and moderate growth centres to be self-sustaining in terms of employment, community and recreation and housing provision. Small growth towns and villages will be developed at an appropriate scale and in a sustainable manner, to ensure that a higher proportion of residents of the towns and villages are employed locally.

Bray is identified as a Metropolitan Consolidation Town within the Metropolitan Area, and together with Greystones/Delgany forms a Primary Development Cluster. The Regional Planning Guidelines provide that Bray should be developed to a relatively large scale as part of the strategy for the consolidation of the Metropolitan Area.

Other similar towns include Swords, Blanchardstown, Lucan, Clondalkin, Tallaght, Dun Laoghaire and Dundrum. The Guidelines set out an *indicative* population range of 40,000 to 100,000 for Metropolitan Consolidation Towns and identify their economic function as, inter alia, attracting major investment.

In the Metropolitan Area, the intention is to create and sustain conditions suitable for major enhancement of existing public transport. It is therefore, critically important that, in the Metropolitan Area, the making of all relevant decisions and policy should give precedence to public transportation, and other sustainable modes, over the requirements of the private car.

Additional areas for residential zoning should be selected on the basis of meeting all three of the following criteria:

- 1. Location within areas identified for development in the strategy.
- 2. Identified potential to be served by adequate public transport and
- 3. Identified potential for servicing by water supply, drainage, etc.

It is an objective to consolidate the urban form of settlements by locating quality employment and residential developments of various sizes in proximity to each other in order to make effective use of suitable lands, reduce the need to travel and reduce the dependence on private car.

Wicklow County Development Plan, 2004 - 2010

Wicklow is a rapidly growing county having experienced a population increase of 11.7% between 1996 and 2002 and a further 10% by 2006. This is a result of population retention, growth, and in-migration and natural population increase resulting from Wicklow's location within the Greater Dublin Area and the influence of Dublin's Urban Shadow, together with the amenities it offers, including its coastline, mountains and scenic rural areas.

The County Development Plan (CDP) provides a settlement strategy configured in accordance with the NSS & the RPG^s and locates population growth and channels development in line with the strategy advised by RPG^s. It recognises the reality that larger settlements have a critical mass and are thus more successful at providing a wide range of environmental, economic & social facilities, in generating indigenous employment growth and attracting inward investment. The settlement hierarchy places Bray, the county's Metropolitan Consolidation Town, a Level 1 town, as the principle growth settlement in the County. Development therein should be focused on:

- A consolidated approach.
- Increased densities and
- Enhancement of the public transport system.

The CDP projects a population for Bray and Environs of 32,012 in 2010 and 35,000 by 2016. The Plan does not expect all towns to reach their indicative populations by 2016. However, it is intended to put the necessary physical infrastructure into place to cater for the future need.

The Plan acknowledges the shortfall of available land within the confines of Bray Town Council, and accordingly, in both the 1999 and 2004 County Development Plans, facilitated the expansion of Bray into the environs by zoning lands for development.

North Bray & Environs Land Use and Transportation Study (LUTS)

The study area of the LUTS encompasses Woodbrook, Rathmichael, Old Connaught, Fassaroe and North Bray, as well as the N11 as far as the junction with the Bray Southern Cross. It overlaps with the study area of the Bray Environs LAP at Fassaroe and also includes the N11 up to the interchange with the Bray Southern Cross Road.

It is the objective of the LUTS to ensure that the study area can cater for expected future levels of development as proposed throughout the Town and County Development Plans, by investigating a range of policies, infrastructural measures, and land use strategies.

Given the amount of land identified for development in the LUTS area, it would be possible to accommodate a target population for Bray and its greater Environs of 52,500 in 2010/11 and of 72,000 in 2020.

Relevant Findings

 The current CDP zoning of Fassaroe for low density employment is not considered either suitable or sustainable land use management in the context of its location so close to the growth centre of Bray, in view of the consolidation objectives for the GDA and the County policies to promote higher densities and public transport. The future development of Fassaroe will have a key bearing on the development of north Wicklow and south Dun Laoghaire-Rathdown.

- It is recommended to intensify development in Fassaroe and alter the current zoning to facilitate a high density mixed use employment and residential development, so as to improve the viability of high quality public transport infrastructure.
- Given the strategic location of Fassaroe, and the possibility of providing good transport connections, a high degree of employment in this area is desirable without compromising the establishment of a sustainable residential community by facilitating higher residential densities.
- A Rapid Transit Strategy is proposed, incorporating a LUAS extension from Cherrywood to Fassaroe, and a Bus Rapid Transit link from Fassaroe and Old Connaught to Bray Town Centre, including a Park & Ride at Fassaroe.
- The LUTS also recommends a scheme of road improvements focused on improving access into the areas west of the M11, and into Bray Town Centre via the Dublin Road; and the development of a cycle network connecting Fassaroe, Old Connaught, Woodbrook and Rathmichael with Bray Town Centre, Cherrywood and DART.

Bray Town Development Plan, 2005 - 2011

The Bray Town Development Plan recognises the strategic location of the town, but also the development pressures that are associated with being located in such close proximity to Dublin.

It is the policy of the Town Council to promote the town's social, economic and cultural growth by building on the town's current strengths and opportunities, but with careful consideration for the development pressures on the town. In particular, the leakage from the town as many people travel outside of Bray for employment purposes, for comparison shopping, and the decline in the town's tourist economy are some of the major challenges to its economic growth and development.

Some of the strategic policy objectives outlined include the aspiration to:

- Promote Bray as a regional centre of economic, social and cultural growth.
- Consolidate the urban form of the town.
- Improve the economic competitiveness of Bray.
- 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.

Strategically, the Plan has unambiguous regard to the policies and objectives of the NSS and the RPGs. It acknowledges the sustainable development responsibilities conferred by its location within the Metropolitan Area of the GDA.

A number of weaknesses hamper the town's development at the present, including:

- Insufficient land to accommodate housing demand.
- The quantum and quality of the town's retail floorspace lags significantly behind other major town centres.
- The lack of employment opportunities and the lack of available land within the town hampers the potential for large-scale development of employment-generating opportunities within the town.
- Development is constrained by a lack of greenfield sites available in the town and by the pattern of the town's existing urban form.
- Increased car use, a lack of routes across the River Dargle and a shortfall of car parking facilities has resulted in traffic congestion and
- Population growth has resulted in increased pressure on the existing social and physical infrastructure.

It is clear from the weaknesses identified by the Bray Town Development Plan that the town will be unable to achieve its strategic policy objectives as set out. To enable Bray Town to fulfil its role as a Metropolitan Consolidation Town it is necessary that the potential of the environs be addressed.

Dun Laoghaire-Rathdown County Development Plan, 2005-2011

The Dun Laoghaire-Rathdown administrative area borders Bray town and environs to the north and north-west.

Dun Laoghaire-Rathdown County Development Plan provides for the preparation of a number of Local Area Plans within this area to the north of Bray.

The Woodbrook/Shanganagh Local Area Plan was published in 2006 and will guide the development of two main parcels of land within the Plan area up to 2016. The two main development zones are a 21 hectare Greenfield site to the north of Bray town ('Woodbrook' site) and 11 hectares of former institutional lands located to the south of Shankill village ('Shanganagh Castle' site). The Plan area extends to the edge of Bray town to the south and the edge of Shankill to the north. The area is entirely located to the east of the M11. The Plan also incorporates 'greenbelt' lands within its boundary.

In addition, it is an objective of Dun Laoghaire-Rathdown County Council to prepare a Local Area Plan for the village of Old Conna, located to the north of Fassaroe. The predraft consultation process for this plan commenced mid September 2008.

7.0 RATIONALE FOR DEVELOPMENT IN THE ENVIRONS

Bray, constrained as it is, is unable to provide for the proper planning and sustainable development of its area. Therefore, it is recognised that the development area of Bray needs to expand in a planned and managed fashion into the Environs area as envisaged in this draft LAP. The inclusion of development proposals and zoned lands in the Bray Environs, and in particular in the Fassaroe area, in the 1999 and 2004 County

Development Plans was in clear recognition of the constraints which restricted the development of the town.

Some of the limitations impacting upon the development of Bray can be listed as the administrative boundary of Dun Laoghaire-Rathdown County Council to the north, the shared administrative boundary with Wicklow County Council, the sea to the east, the natural heritage and amenity designations of Bray Head, the Sugar Loaf and Little Sugar Loaf mountains, the Cookstown and Dargle River Valleys, the built heritage of Bray, the lack of available greenfield sites for development purposes within Bray, the limitations imposed by the development of brownfield sites and the necessity in the interests of proper planning and sustainable development to ensure that the coalescence of settlements such as Bray, Greystones, and Enniskerry should not occur. In consideration of these constraints, an analysis of the study area was carried out, resulting in the identification of lands in Fassaroe as being the optimum for development purposes, with limited potential for development in the area surrounding Kilruddery Demesne.

A summary of the findings of the analysis of the greater study area to determine the optimum development locations includes the following:

Kilmacanogue East

The area east of Kilmacanogue was not considered suitable to accommodate development as the potential lands for development are distant from the existing village, aggravated by the severing impact of the N11, with no access to efficient public transport infrastructure presenting a further locational disadvantage.

Bray South

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. Similar to the lands in Kilmacanogue these designations do not necessarily preclude zoning or future development. However, the 'Bray South' lands appear to be particularly sensitive due to the lands sloping quite significantly up to the Little Sugar Loaf to the south and being in part visible from the Southern Cross Road.

A limited extent of low density development is considered viable on lands within the Kilruddery Demesne, but at a sufficient distance from the Estate House and in close proximity to existing employment and residential development. In addition, other uses identified as viable, such as tourism, on Demesne lands should be located to the edge of the Demesne and uses that are tied to the heritage of the Kilruddery Estate. Scope exists for an element of low density residential development located to the south of and immediately adjoining the existing industrial estate that adjoins the Southern Cross Route.

Lands to the North and South of the River Dargle

The land south of the Dargle Glen and between the Dargle and Cookstown River is not recommended for future development owing to the sensitivity of the landscape, inappropriate access to the N11 across the Dargle Bridge, inadequate access along small country lanes, and the lack of quality public transport infrastructure.

The majority of the lands to the north of the Dargle Glen and the study area boundary to the south are not identified for substantial development owing to the sensitivity and high amenity of the landscape indicated by environmental designations, the rural character and remoteness from the built-up area and the lack of existing or proposed efficient public transport.

Fassaroe

The Fassaroe area is located within the Metropolitan Area as designated by the RPGs. These lands have been zoned for development purposes in both the 1999 and 2004 County Development Plans, in clear recognition that the lands are suitable to accommodate the necessary expansion of Bray Town.

Therefore, the Fassaroe area is considered the only location within the Environs of Bray which is suitable to accommodate a significant new population and employment opportunities. In particular, the direct access to the N11 and the M1 motorway, the planned extension of the LUAS to Bray and Fassaroe, and its locational advantage within the Greater Dublin Area, afford the area a strategic advantage by ensuring the sustainability of a greater residential and working population.

Map1 shows the study areas included in the preliminary zoning study.

8.0 POPULATION

Rapid population growth in the last decades and up to 2002 particularly, was mainly focused on the Environs area, that includes Wicklow County Council and Dun Laoghaire-Rathdown County Council as shown in Table 2.

Table 2 Population in Bray and Environs 1996 - 2002

	1996	2002	Change '96-'02
Bray Town	25,252	26,244	3.9%
Bray Environs (Wicklow and DLR)	2,671	4,707	76.2%
Total	27,923	30,951	10.8%
Fassaroe	149	156	4.7%

Source: CSO, Census 1996, 2002

The population for Bray as published in the 2006 Census is 27,041, which represents a small increase of 3.0% on the 2002 population, while the Environs area in County Wicklow recorded a much smaller increase of 0.8% in the intervening period since 2002. Table 3 below refers. This limited growth in both the town and its environs highlights the constraints on development within the town and the lack of appropriately zoned lands outside the town.

Table 3 Actual Population in Bray Town and Suburbs & Environs; 2002 & 2006

	2002	2006	Change '02-'06
Bray Town	26,244	27,041	3.0%
Bray Suburbs & Environs (Wicklow only)	1,758	1,773	0.8%
Total	28,002	28,814	2.9%

Source: CSO, Census 2002 & Census 2006

The various existing projections and population targets for the town and its environs are summarised in Table 4.

Table 4 Population Projections for Bray and Environs

	2002	2010/11	2016	2020	Actual Increase 2002-2016/20
Bray Town DP ²	26,244	30,000	31,000	-	+4,756
Wicklow County DP	30,951	32,012	35,000	-	+4,049
RPGs	30,951	-	40-100,000	-	+9,050 - 69,049
Bray Environs LUTS ³	30,951	52,500	-	72,000	+41,049

The Bray Town Development Plan projects a population for the Town Council area of 30,000 by 2010/2011 and 31,000 by 2016. The Wicklow County Development Plan projects a population for the combined town and environs area in County Wicklow of 32,012 by 2010/2011 and 35,000 by 2016. The Bray Environs LUTS indicates that a population of 52,500 by 2010-2011 could be accommodated subject to the transport improvements suggested, while the RPGs aim for an indicative population range of between 40,000 and 100,000 by 2016. This RPGs figure includes the environs of both Wicklow County Council and Dun Laoghaire-Rathdown County Council.

This target of 35,000 as set in the County Development Plan is considered the most sustainable and achievable at the present time. In 2006, the population of the town and its environs stood at close to 29,000, as recorded in the Census of that year. The shortfall to meet the population target of 2016 is therefore 6,000. However, other factors such as household size, excess factor, headroom and housing density are also to be considered in the equation.

² Figures in this row refer to the Town Council area only.

³ The figures in this row exclude projections for the zonings potentially recommended as part of this study and only take into account projections for the remainder of Bray and Environs. It also assumes that there will be only marginal growth in the Bray Town Council area, with the majority of future growth taking place in the Environs. The projections are based on information obtained from Bray Town Council, Wicklow County Council and Dun Laoghaire-Rathdown County Council at the time of preparation of the Bray Environs LUTS.

9.0 EMPLOYMENT

Travel to Work

The extent of commuting that is currently taking place can be determined from analysis of the Travel to Work figures from the Census 2006.

In Bray town, there are 14,177 people aged over 15 classified as 'at work'. Of those that provided distance to travel information (11,550 people), over 56% or 6,539 people travel 10 kilometres or more to work. Over 70% of the working population of Bray travel 5 kilometres or more to work. In other words significant levels of the working population in Bray do not work in the town.

The Census estimates that there are 4,759 jobs in the Bray Urban Area, almost 70% of which are taken up by people in living in Bray. Therefore, over 1500 people from outside the town are commuting to Bray for employment purposes.

The most recent figures (from CSO Census 2006) show that 26% of workers in Wicklow travel more than 25 kilometres to work, compared with 15.6% of workers nationwide. While 10.5% of workers nationally spend more than 1 hour travelling to work, in Wicklow 18% of workers spend over an hour travelling to their workplace. The Regional Planning Guidelines for the Greater Dublin Area estimated a Jobs Ratio⁴ in the County of 0.59, and recommend that a more sustainable ratio of 0.70 should be attained. In order to achieve this target and reduce unsustainable long distance commuting there is an urgent need for the provision of high quality employment opportunities within the county and the need to rezone lands to provide employment-generating uses.

Residential and commercial development in the Environs area would have important implications. The creation of employment opportunities within close proximity of new and existing residential development would consolidate Bray town and its Environs. This approach to development would reduce the need for commuting, provide the necessary physical and social infrastructure, and thereby provide a more sustainable approach to development.

Employment Projections

In the 4 year intercensal period between 2002 and 2006, the national labour force increased from 1,800,933 in 2002 to 2,109,498 in 2006. This represents an increase of 17.1%. This growth is attributable to the growth in population, in-migration and the increased female participation in the labour force.

The labour force participation in Wicklow is 63%, of which 73.8% are male and 52.3% are female. The national participation rate is 62.4%. The labour force participation rate in Wicklow is therefore in line with the national average.

The CSO, in its publication *Population and Labour Force Projections, 2011-2041*, estimates the change in labour force under two assumptions: M1 assumes a continued growth in the labour force, while M2 takes a more pessimistic view assuming slower economic growth and a drop in in-migration.

⁴ The Jobs Ratio is the total number of jobs divided by the labour force.

According to the CSO, it is estimated that under scenario M1 the labour force will increase by 750,000 from 2.12 to 2.87 million between 2006 and 2021. Under the M2 scenario, it is estimated that the labour force will increase at a slower rate to reach 2.72 million by 2021.

In the short-term, the ESRI Quarterly Economic Commentary for Autumn 2008 continues the recent trend of downward revisions. The latest report predicts both GNP and GDP will contract by 1.3 per cent in 2008, revised down from the Summer forecast of 0.4 per cent. A Government deficit of 5.5 per cent GDP is expected, while the rate of unemployment is forecast to average at 6.1 per cent in 2008, rising to 8 per cent in 2009. An economic upturn is expected in 2009, with both GNP and GDP to grow to -0.7 per cent. The forecast for a recession in 2008 is based on the National & International Banking uncertainty, the downward trend in the housing market, with a slowdown in commercial building also predicted for 2009.

While it is accepted that in the short term there is a slow down in growth, this plan caters for the medium to long term and will thus adopt the M2 growth scenario of the Central Statistics Office.

Furthermore the development of Bray Environs in accordance with this LAP provides the opportunity to significantly expand the employment opportunities available not only for Bray Town and its Environs but also for North Wicklow. While this will in turn stem the current migration of workers northwards out of the County and reduce the unsustainable level of travel distances and times incurred.

10.0 QUANTITY OF ZONED LAND

Residential Development

Bray Town Development Plan recognises the insufficient supply of houses within the town, the resultant increase in house prices and the consequent settlement of people outside the town. This trend, if it continues, will do nothing to achieve the population targets predicted and will not serve to sustain the critical mass necessary to accommodate a sustainable settlement. However, a number of factors, as outlined above in Section 7.0, impede the provision of the necessary housing supply. The Fassaroe area is therefore identified as having the potential to house the predicted future population of the town in a sustainable manner. The creation of a permanent resident population within the LAP area is imperative to create a critical mass and to ensure the sustainable development of both the town and the Fassaroe area. The majority of land proposed to be zoned for residential development will be in the Fassaroe area. These lands are identified for development to varying degrees of density, with higher densities proposed within mixed use zones in close proximity to the public transport network and the necessary social, economic and community infrastructure. It is proposed to zone a relatively small area of land 7.5 within the Kilruddery Estate for low-density residential development.

Though this Plan is for the 6-year period from 2008 to 2014, zoning will be in the context of the population target set in the County Development Plan.

Households and Household Sizes

Population trends indicate that the average household size in Ireland is experiencing a gradual decline. In 2002, the national average household size was 2.94 persons per household; the average household size was 2.81 in 2006. The National Spatial Strategy indicates a convergence to the EU average of 2.63 by 2011, corresponding with an increase in the number of single person households.

The 2006 Census identified 10,861 private households in Bray town, with an average household size of 2.86. This is slightly higher than the national average at 2.81, but lower than the county average of 2.89. The average household size in Bray in 2002 was 3.02. The deciding household size in Bray illustrates a change in living patterns, including the increased availability of apartments, a higher incidence of single occupancy in the intervening 4-year period and a decrease in family size, all of which are typical in urban areas across country. The household size in the area is likely to decrease further in line with national and EU trends.

The RPGs indicate household occupancy rates will fall to an average household size of 2.56. This figure is used in projecting the resident population within the Plan area. In order, therefore, to accommodate circa an additional 7,000 persons by 2016 in the Bray Local Area Plan, a further 2,344 households would be required.

Table 5 Average Household Sizes; 2002 & 2006

	2002	2006
State	2.94	2.81
County Wicklow	3.06	2.89
Bray Town	3.02	2.86

Source: CSO, Census 2002 & 2006

Excess Factor

According to the Regional Planning Guidelines for the Greater Dublin Area, more houses are usually constructed than needed to cater for the increase in households. This is called the *Excess Factor*. The Guidelines state that there has been an excess factor of 16.8 per cent in the Mid-East Region in the period 1996 to 2002, and predict that the excess factor will be approximately 13 per cent by 2020. However, the excess factor varies within and between regions, and between urban and rural areas.

Based on those variations, an excess factor of 13% is considered too high for the Plan area. Therefore, an excess factor of 6% is applied. On this basis, the number of residential units/households required is 2,485 i.e., 2,344 + 141 (6%).

Headroom

'Headroom' is the amount of land that should be zoned over and above the minimum amount needed to accommodate population targets. It is also known as the 'market factor' and is intended to allow for that element of zoned land that may not be released to the market for housing purposes during the Plan period. Headroom is normally in the 30% - 50% range; however, a figure of 10% will be applied in this Plan given the likelihood that all or the majority of the land proposed for zoning in this Plan will be developed. In this context, the LAP must make provision for zoning for 2,734 residential units (2,485 households + 10%).

Housing Density

It is assumed that residentially zoned lands, which are generally 'greenfield' in nature, will be developed to density standards higher than set out in the County Development Plan, 2004, thereby requiring a variation to the Development Plan. The development of lands at Fassaroe will be developed to relatively high densities, owing to the need to provide the critical mass necessary for the viable and successful implementation and operation of the proposed LUAS extension to Fassaroe, and ultimately, to provide a sustainable district centre. On this basis, an average density of 85 units per hectare is proposed in MU1, MU2 and R2 zones. A lower average density of 50 units per hectare is proposed in the R3 zone. (Refer to Figure 4, Fassaroe Land Use Zoning Map.)

Lands in Kilruddery that are proposed for residential use will be developed to a much lower density owing to the sensitive nature of the demesne setting. A density of between 7.5 and 10 units per hectare is proposed for the R4 zone.

Conclusion

The above calculations therefore propose a target population for the Plan area of approximately 7,000 persons. While this slightly exceeds the Development Plan target it is considered justified in the context of the targets set by both the RPGs and the LUTS, and taking into consideration the high quality light rail public transport that will underpin development in the Fassaroe area.

Fassaroe

A target population of 6,660 is assumed. This is calculated on the basis of the assumptions above, including a density of 85 units per hectare in the high density zones (R2, MU1 and MU2) and a density of 50 units per hectare in the medium to low density zone (R3); and an average household size of 2.56. Within the mixed use zones, residential is assumed to comprise 15% of the mix in the MU1 zone and 60% of the mix in the MU2 zone. Table 6 below refers to the residential land use scenario for Fassaroe.

Table 6 Residential Land Use Scenario for Fassaroe

	На	Density u/ha	HH Size	Res. Units	Pop Future
High Daneity Boo	2.8	85	2.56	238	609
High Density Res ('R1' Zone)	1.9			162	413
(KI Zolie)	3.0			255	653
	2.0	50	2.56	100	256
Medium - Low Density Res	4.6			230	589
('R2Zone)	3.3			165	422
(1.5			75	192
Mixed Use 1 ('MU1' Zone)	5.6	85	2.56	71	183
Mixed Use 2 ('MU2' Zone)	25.6	03	2.30	1,306	3,342
Total	50.3	-	-	2,602	6,659

Kilruddery

Approximately 7.5 hectares of land within the existing Kilruddery Estate is zoned for low-density residential development ('R4' Zone). This zone permits a density of between 7.5 and 10 units per hectare, with an average household size of 2.56. On this basis a population of between 146 and 195 is proposed. Table 7 below refers.

Table 7 Residential Land Use Scenario for Kilruddery

	На	Density u/ha	HH Size	Res. Units	Pop Future
Low Density Res ('R3' Zone)	7.56	7.5 - 10	2.56	57 - 76	146 - 195
Total	7.56	-	-	57 - 76	146 - 195

Employment & Enterprise

The opportunity for employment-generating development is restricted in Bray, owing to the lack of available land for large-scale employment and enterprise development within the town boundary. This situation is undesirable given the strategic location of the town in close proximity to the Dublin city area, with high quality infrastructure linking the town to the wider metropolitan area.

Fassaroe

This LAP provides for sufficiently zoned lands within the plan area to ensure the sustained growth of the settlement at Fassaroe and complement the lack of opportunity in Bray Town. Established employment/industrial land uses already exist within Fassaroe, including the Greenstar Facility and the Roadstone Quarry. The LAP provides a number of different zones for employment/industrial land use. A target employee population of approximately 17,000 persons is assumed. Various plot ratios and employment densities per sq. m. are proposed within the different land use zones. Table 8 below refers.

Table 8 Employment/Industrial Land Use Scenario for Fassaroe

	Ha/ sq. m.	Employment Density	Plot Ratio	Employees		
High Density	3.2 ha			1,920		
Employment	3.2 ha	25	1.5	1,920		
(`E1' Zone)	6 ha			3,600		
Industry/ Business Park	22.7 ha	50	0.5	2,270		
(`E2' Zone)	5.2 ha			520		
Warehousing ('E3' Zone)	11.1 ha	80	0.3	416		
Mixed Use 1 ('MU1' Zone) Office	11,200 sq. m.	1.5	25	672		
Mixed Use 1 ('MU1' Zone) Retail	10,000 sq. m.	20	-	500		
Mixed Use 2 ('MU2' Zone)	76,800 sq. m.	1.5	25	4,608		
Total	-	-	-	16,426		

Kilruddery

The hotel zone proposed for the site known as the 'Foggy Field', located to the northeast of Kilruddery House, will also generate employment opportunities. A target of 150 no. employees is assumed for the hotel zoned lands at Kilruddery, based on the assumption of a 300 bedroom hotel requiring 1 employee per 2 bedrooms.⁵

Social and Community Infrastructure

The provision of sufficient social and community facilities including recreation and amenity facilities is recognised as imperative in achieving the principles of sustainable development and a desirable place in which to which live and work. Significant community infrastructure will be provided therefore under the policies and objectives of this Local Area Plan. Within the Mixed Use (MU1 and MU2) zones in Fassaroe, 20% of zoned lands will be set-aside for community & other uses. These facilities are intended for not only the future population in this area, but also the existing community in Bray.

The Council's Policy Document, "Open Space Standards", sets a recommended standard of open space provision of 2.4 hectares (ha) per 1,000 population. Of this 2.4 ha, 1.6 ha should be provided for outdoor sport and 0.8 ha should provide for children's playing space. Children's playspace shall be divided between Equipped Children's Playspace (0.2 ha) and Casual Informal Playspace (0.6 ha). The Councils Policy Document recommends that these open space standards shall be provided net of the 15% open space required as part of all new housing developments.

Open space, in the form of a district park and linear spaces, will intersect through the land use zones in Fassaroe, ensuring permeability through the development area. The District Park is proposed as a significant community resource for Fassaroe and the wider Bray area. It provides for an area over 23 ha, which exceeds the recommended standard of the Council's open space policy document by almost 7 ha. The proposed size of the district park is justified, as it will ensure the delivery of Social and Community Infrastructure in a sustainable manner in line with the relatively high densities proposed.

A linear form of open space is also proposed within the Killruddery Demesne to the south of the proposed R3 zone, 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.

A hierarchical structure is proposed for the provision of community and recreational facilities. Such facilities will be provided throughout the Plan area, however the facilities will be focused in the core area primarily, with smaller local facilities providing community open space and play areas at a local level. The 'clustering' of community and recreational facilities alongside a local neighbourhood retail centre shall be acceptable in order to provide a sustainable pattern of development

The provision of schools within the Plan area, in tandem with community and recreational facilities, is imperative to further strengthen the sustainability of development. Department of Education guidance estimates that, at any one time, 12% of the population is of primary school going age and 8.5% of the population is of post-primary school going age.

⁵ Employment Densities: A Full Guide; English Partnerships; July 2001

In the context of this Local Area Plan a projected resident population of approximately 7,000 in the Plan area, would equate to a primary school going population of 840 pupils and a post-primary school going population of 595 pupils. This Plan therefore provides for the provision of 2 no. primary schools and 1 no. post-primary school within the Plan area.

Retail

In order to develop a sustainable settlement centre at Fassaroe, a level of quality retail facilities must be provided commensurate with new population levels. The provision of such facilities, particularly convenience facilities, will help establish a sustainable neighbourhood within Fassaroe, in line with the land use zoning objectives set out in this Plan and the overarching policy of reducing unsustainable travel patterns by retaining a critical mass of land use activities. Ultimately, the retail element proposed within the Plan area shall not detract from the vitality and viability of Bray Town Centre.

The quantum of retail floor space proposed is informed by the Retail Planning Guidelines and the Retail Strategy for the Greater Dublin Area, 2008 - 2016, and the provisions of the Wicklow County Development Plan.

The Retail Strategy for the Greater Dublin Area (GDA), 2008 - 2016 promotes the provision of easily accessible retail facilities within a central area, supported by community and civic functions. The Retail Strategy for the GDA defines a Neighbourhood Centre as comprising a supermarket or discount food store of between 1,000 and 2,500 sq. m., with a limited range of supporting shops and retail services. The Strategy also envisages community facilities and health clinics grouped within a neighbourhood centre to create a focus for the local population. This approach is in keeping with the Retail Planning Guidelines.

Having regard to the target resident population of 7,000 persons, it is estimated that there could be available expenditure of c. €23.5m for convenience goods and €36m for comparison goods in the plan area catchment in 2016⁶. This equates to c. 1,600 sq. m. of convenience floor space and c. 5,500 sq. m. comparison floor space⁷. Furthermore, the working population from within the Local Plan area and population from outside the immediate environs will also create a demand for retail and retail services. In this regard, this plan will allow for sufficient convenience retail floor space to absorb all of the convenience spend but, in order to safeguard the comparison function of Bray town, the comparison offer allowable will be limited to c. 25% of the available expenditure. This combined retail offer will then be larger than a neighbourhood centre.

A district centre is thus provided for within the core MU1 zone, comprising up to 4,000 sq. m. of gross retail area, of which no more than 2,000 sq. m. gross would be dedicated to convenience retailing, with the remainder made up of comparison retail/services/nonfood outlets. These are 'guideline' figures only. The final scale and breakdown on the district centre will be determined following full Retail impact Assessment.

Having regard to the geographical spread of the Fassaroe area, there is a need for further small-scale neighbourhood local centres that would provide a top-up shopping

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⁶ Derived from CSO / ESRI data (expressed in 2004 prices) – approx €3,355 per capita expenditure of convenience goods and €5,117 per capita expenditure of comparison goods

⁷ Based on turnover of €14,552/sqm convenience and €6,600/sqm comparison

function, in particular in the north-east and north-west sectors. Typically, these may comprise a small convenience outlet and local shops/services. Proposals in this regard would be assessed on their merits and subject to the protection of the identified function of the district centre and to the protection of residential amenity.