



BRAY ENVIRONS LOCAL AREA PLAN, 2009 - 2015

2nd MANAGERS REPORT

On submissions to the Modifications to the Draft Bray Environs Local Area Plan
following the public display period

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PART A

1.0 INTRODUCTION

This Manager's Report has been prepared and is submitted under Section 20 of the Planning & Development Act 2000 (as amended), and forms part of the formal statutory process in the preparation of a Local Area Plan.

This Report contains the following:

- A list of the persons or bodies that made submissions;
- A summary of the issues raised categorised by topic;
- The response of the Manager to the issues raised, taking into account the proper planning and sustainable development of the County and any relevant policies or objectives of the Government or Government Minister.

The Report is now formally submitted to the Council for consideration. The Report will be on the agenda of the County Council meeting on 27th April 2009.

1.1 Consultation Process

The aim of the consultation process is to enable the public and interested parties to give their opinions/observations on the content of the Plan.

Following the publication of the Background Issues Paper, a public consultation meeting with stakeholders and the general public on the Background Issues Paper was held on 7 February 2008 in the Royal Hotel, Bray. A Draft Bray Environs Local Area Plan was published by the Council and was placed on extended display during the period of Wednesday, 12 November 2008 to Wednesday, 7 January 2009 inclusive. On three occasions presentations were made to the Members and Executive of Bray Town Council.

A total of 150 no. written submissions were received on the Draft Local Area Plan. A report on these submissions was prepared by the Manager, for consideration by the Elected Members.

At the March Council meeting the Members decided on a number of material modifications to the Draft Plan. These Modifications were placed on public display during the period of Wednesday, 11 March 2009 to Wednesday, 8 April 2009 inclusive.

A total of 54 no. written submissions were received on the Modifications. The written submissions are held on file, and are available for Council and public inspection.

A list of the persons or bodies that made submissions is contained in Section 2.0 of this Report.

1.2 Considering the Submissions

The written submissions have been analysed by the Executive of the County Council. The individual submissions are summarised, and the opinion and recommendations of the County Manager are given in Section 3.0 of this Report. This Report is submitted to the Members of the Council for consideration.

1.3 Next Steps - Draft Local Area Plan Timetable

Following the distribution of this Report, the Council must consider the Report and decide whether to make the Local Area Plan with or without modifications. Formally making the Local Area Plan is undertaken by way of resolution of the Council.

The Members of the Council will, having considered the amendments and the Manager's Report, make the Local Area Plan for Bray Environs "with the variation or modification proposed by the members of the planning authority or, if different from that variation or modification, the variation or modification as recommended in the Manager's Report (...), unless, where such a recommendation for a different variation or modification is so made, the planning authority, by resolution, decides to make or amend the Plan otherwise than in accordance with that recommendation (and the variation or modification the members of the authority so decide upon shall be the original variation or modification proposed by them, subject to such amendment of it as they consider appropriate)." (Section 20(3)(g)(ii) Planning and Development Act, 2000, as amended).

In making the Local Area Plan the Members of the Council are restricted to:

- Considering the proper planning and sustainable development of the area to which the Development Plan relates,
- The statutory obligations of the local authority, and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

Plan Timetable

The timeframe for the process is now fixed in legislation. The Planning and Development Act, 2000 (as amended) requires that a Local Area Plan be made within 35 weeks of commencement of the process. The timeframe with regard to the Draft Bray Environs Local Area Plan is set out below in Table 1.

Table 1 Timeframe Progress of Statutory LAP Process

Date	Stage	Duration
2 March 09	Council Members decide to modify Draft Plan. Amendments must be placed on public display for at least 4 weeks.	-
11 March - 8 April 09	Modified Local Area Plan on public display and open to submissions by the public	4 weeks
8 April - 17 April 09	Preparation of Manager's Report on Submissions received	Within 4 weeks
17 April - 27 th April 09	Manager's Report considered by Members	Within 6 weeks
27 th April 09 / 29 th May 09	Council Meetings Plan is adopted as per Manager's recommendation (or) Members make Plan contrary to the Manager's recommendations	-

PART B

2.0 SUBMISSIONS RECEIVED

Sub No.	Surname:	Forename:
1	Aherne & Hayes x2	Conor & Marie
2	An Taisce	
3	Behan TD	Joe
4	Blennerhassett	Caroline
5	Brady Cllr	John
6	Bray Retainers Group	
7	Bray Town Council	
8	Burrell Cllr	Caroline
9	Cosgrave Developments	
10	Costello	Pat
11	DCENR	
12	Deepdales Residents Association	
13	Department of Education	
14	DOE	
15	Donnelly	Rory
16	Downer	Karen
17	Earl of Meath & Brabazon	David
18	EPA	
19	Fenlon	Jane
20	ffrench	Aidan
21	Fitzsimons	Jacinte & Paul
22	Heffernan & O'Malley	Denise & Garrett
23	Hollybrook Park Residents Association	
24	48 Hollybrook Park (Graeme Bird)	
25	101 Hollybrook Park (name illegible)	
26	86 Hollybrook Park (J White)	
27	119 Hollybrook Park (Mark Rooney)	
28	102 Hollybrook Park (Dr. Johan Dehantschutter)	
29	85 Hollybrook Park (Alan McHugh)	
30	69 Hollybrook Park (Philomena Foley)	
31	124 Hollybrook Park (Susan Geraghty)	
32	152 Hollybrook Park (name illegible)	
33	144 Hollybrook Park (name illegible)	

34	148 Hollybrook Park (Rosemary Lynch)	
35	135 Hollybrook Park (Alyson Carroll)	
36	150 Hollybrook Park (name illegible)	
37	146 Hollybrook Park (Martin Gibbons & Bernie McCarthy)	
38	137 Hollybrook Park (Elaine Bailey)	
39	129 Hollybrook Park (M & E Ryan)	
40	108 Hollybrook Park (I & B Nesbitt)	
41	133 Hollybrook Park (Rita and John Brophy)	
42	142 Hollybrook Park (John Powderly)	
43	154 Hollybrook Park (Jillian Deady)	
44	57 Hollybrook Park (Roy Bowden)	
45	MacMaolain	Caoimhin
46	Murphy	Blaithin
47	Murphy	Fiona
48	Murray & McGuire	Paul & Yvonne
49	O Floinn	Eanna
50	Residents of Swanbrook, Hoolybrook Park, and Deepdales estates	
51	Riddlesford Residents Association	
52	Thomson	Neal & Lesly
53	Wheatley	Philip
54	Wilkins	George

PART C

3.0 CONSIDERATION OF SUBMISSIONS RECEIVED

All submissions have been considered in light of the overarching purpose and scope of the plan:

The purpose of the Bray Environs Local Area Plan (LAP) is to establish a framework for the proper planning and sustainable development of the Environs of Bray commensurate with its 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 aspects 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.

This Manager's Report only considers submissions made on the Modifications to Draft Plan. Under section 20(3)(f)(ii)(III) of the Planning and Development Act 2000 (as amended), the Manager's Report can only contain opinions and recommendations to the displayed modifications. Submissions or parts of submissions that have regard to the anything other than the Modifications cannot be considered in this Report.

For ease of reference the Table in Part 3 follows the list of change numbers set out in the booklet of Proposed Amendments to the Draft Plan published in July.

Modification Number	Submitter	Topic
17, M4	Conor Aherne and Maria Hayes	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none">(a) While the last manager's report proposed a 30 metre buffer zone, the 10 metre buffer zone proposed in the modified map is inadequate. The buffer zone should be increased to 40 metres, to include the mound to the rear of the existing residential estates. The existing mound at this location should be reinforced to provide a continuous barrier.(b) The buffer zone should not be accessible to the general public in the interests of security and privacy. <p>Response</p> <ul style="list-style-type: none">(a) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.(b) It is not intended that there will be any barrier around the buffer

		<p>zone, thereby ensuring that it will be accessible to the general public.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
<p>2, 3, 7, 17</p>	<p>An Taisce</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ol style="list-style-type: none"> (a) The plan is proceeding without the required integrated assessment with the Bray Town Council area. (b) There has not been adequate suitability and sustainability analysis to the proposed area for rezoning in Killruddery Demesne. Attention is drawn to the National Spatial Strategy policy on consolidating existing towns. The proposal constitutes a piecemeal further alienation of part of the Killruddery Demesne which would further compromise its setting. The proposal would add to the service burden of the housing estate to the east as the area is poorly served by public transport and local services. (c) The policies set out in <i>Smarter Travel - February 2009</i> are not reflected in the plan. (d) The LAP fails to set out appropriate integrated policies for Killruddery Demesne, and in light of the lack of an overall strategy, the rezoning of lands at Killruddery is premature. The LAP fails to set out proposals to provide for the maintenance and conservation of Kilruddery Demesne. <p>Response</p> <ol style="list-style-type: none"> (a) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. (b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. (c) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions

		<p>and recommendations on the displayed modifications.</p> <p>(d) All future development in Kilruddery Demesne will be subject to an Action Area Plan which will ensure the sustainable, phased and managed development of the demesne during the plan period. It is agreed that this Action Area Plan should include details on the conservation and maintenance of the Demesne.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide details of the conservation and maintenance of the existing Demesne landscape and buildings.
2, 3	Joe Behan TD	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) There should be no increase in the number of residential units allowable.</p> <p>(b) The proposed residential and tourism zones on Kilruddery should be removed.</p> <p>Response</p> <p>(a) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area.</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. It is not within the remit of this stage of the process to remove proposed residential and tourism zone.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
11, 13, 14 & 17	Caroline Blennerhassett	<p>Submission</p> <p>(a) Completely opposed to this rezoning.</p> <p>(b) The people of Hollybrook Park will suffer with the increased traffic volumes and in turn the safety of our children will be put at risk.</p> <p>Response</p>

		<p>(a) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(b) No pedestrian or vehicular accesses are proposed through the Hollybrook or Swanbrook housing estates. Map 5 should be altered to clarify this point.</p> <p>Recommendation It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery from the Bray Southern Cross Route.
2, 3	Councillor John Brady	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>Modifications 2 and 3.</p> <p>(a) There should be no increase in the number of residential units allowable.</p> <p>(b) There is sufficient land zoned for residential development in the Bray area, there should be no residential development in this area, and the SAAO should be extended.</p> <p>Response</p> <p>(a) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area.</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications. It is not within the remit of this stage of the process to remove proposed residential and tourism zone. The adopted SAAO related to Bray Head.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
General	Bray Retailers Group	<p>Submission</p> <p>The submission makes the following suggestions:</p>

		<p>(a) Bray Town Centre must be preserved and enhanced, as per County and Town policies.</p> <p>(b) A "Boghall" type and size of shopping centre would be acceptable in Fassaroe.</p> <p>(c) A larger retail provision would inhibit and curtail the attractiveness of Bray Town Centre.</p> <p>(d) Sequentiality should be the overriding criteria.</p> <p>Response</p> <p>This submission refers to the Draft Plan and not any specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The Local Area Plan does, however, deal with these issues in Part B, Section 6.0 Retail, pages 11&12.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
<p>General</p>	<p>Bray Town Council</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) A business plan should be prepared in respect for the development of the Kilruddery Estate, indicating the number of houses necessary to fund the tourism development. This business plan should demonstrate that the development is sustainable and the gardens will be maintained into the future.</p> <p>(b) A traffic management plan showing entrances, exits, trip generation and road capacity should be submitted.</p> <p>(c) The buffer zone should be extended to separate Hollybrook and the existing Industrial Estate from the Kilruddery Estate.</p> <p>(d) The buffer zone should be more than 10 metres.</p> <p>(e) The plan makes insufficient provision for tree protection and wildlife conservation.</p> <p>(f) The French Gardens should be protected under the plan.</p> <p>(g) The Foggy Field should be considered for use as allotments.</p> <p>(h) A forum for residents should be set up.</p> <p>(i) The Southern Cross Road needs to be better maintained, with improved signage.</p> <p>(j) Anti-social behaviour could occur on the proposed walkway.</p> <p>Response</p> <p>(a) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The Action Area Plan and phasing pertaining to development in Kilruddery will ensure the comprehensive and sustainable development of the Demesne.</p>

	<p>(b) A traffic management plan is considered more appropriate at masterplanning and planning application stage. The maps accompanying the Local Area Plan indicate the main vehicular and pedestrian access points.</p> <p>(c) It is considered appropriate to extend the buffer zone to separate the new R3 zone from the Hollybrook houses. It is not considered necessary to extend the buffer to separate the R3 zone from the existing Industrial Estate, as there are no residential amenities that require protection at this location. Furthermore, the buildings in the Industrial Estate are generally well set back from the boundary with the R3 zone.</p> <p>(d) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(e) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The Draft Plan at, in particular sections 10 and 11 addresses the issues of natural heritage specific to the plan area, with a number of polices in relation to the protection of natural habitats. The overarching provisions of the County Development Plan with regard to tree protection and wildlife conservation also apply to this Local Area Plan.</p> <p>(f) All future development in Kilruddery Demesne will be subject to an Action Area Plan which will ensure the sustainable, phased and managed development of the demesne during the plan period. It is agreed that this Action Area Plan should include details on the conservation and maintenance of the Demesne, including the French Gardens.</p> <p>(g) The provision of allotments in the Demesne is considered a sustainable use.</p> <p>(h) This is not a planning matter. Furthermore this issue was not contained in the displayed modifications.</p> <p>(i) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(j) The potential for anti-social behaviour should be addressed by Action Area Plan for Kilruddery.</p> <p>Recommendation</p> <p>It is recommended that the Tourism Zone objective and indicative uses are altered in order to allow the provision of allotments as per Modification 14 (Part B: Section 13 - Land Use Zoning Objectives, Page 19):</p>
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		<p>Tourism (T) Objective: To provide for tourist and community related activities focused on Kilruddery House and Demesne. Vision: This zoning objective seeks to facilitate and provide for the sustainable development of Kilruddery House and Demesne, a Demesne of local and regional importance in the interests of the economic, social, educational, historic, physical and cultural benefit to the Demesne and the greater environs. Such Tourist Uses include: Tourist and community related activities, as appropriate within the context of the surrounding Demesne environment, including restaurant/tea rooms, craft factory outlet shops, heritage centre, farm shop/farmers market, allotments, walled garden restoration, equestrian centre, in accordance with the County Development Plan and this LAP.</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & Implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that the following is added to bullet point no. 5 in Modification 17 (Part B: Section 14 - Phasing & Implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area shall on the zoning map include the provision of a walking route as shown and the provision of a walkway through the estate to the Little Sugar Loaf mountain and west to the Demesne boundaries. This walkway shall be a managed walkway to ensure that anti-social behaviour does not occur. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide details of the conservation and maintenance of the existing Demesne landscape and buildings.
1, 2, 6, 11, 13, 17	Cllr. Caroline Burrell	<p>Submission</p> <p>The Planning Authority is legally restricted to only consider submissions made in relation to the advertised Modifications.</p>

		<p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) The Modified Plan should have listed the content under the name of each of those who made a submission to the Draft Plan. (b) The Plan should be carried out at the same time as the Bray Town Development Plan in order to ensure a joint approach. (c) The Plan is too vague and fails to provide information on when, where and what development will take place. (d) Modification 1: The dates of the Plan should not change, and are only proposed to suit the developer. (e) Modification 2: The upper density maximum of 16 dwellings per hectare should remain unchanged as it will mitigate against the development of detached eco-buildings on the site. What happens if the houses do not sell - how will the proposed tourism facilities be financed? (f) The Plan does not meet a number of policies of the Bray Town Development Plan 2005-2011. (g) The area zoned "T" in Killruddery is too large particularly in relation to the impact on residents in adjoining housing estates. A buffer zone of 25-50m (not 10m) should be provided between the "T" zone and the adjoining housing estates. (h) Areas for community gardens or allotments should be provided in Killruddery. (i) The Plan is vague on the proposed Implementation Strategy. (j) What benefit will there be to Bray Town Council? (k) The Bray Town Council boundary should be extended. (l) How will surrounding residents be protected from noise, loss of privacy etc., in relation to proposals in Killruddery? (m) How will access be provided into Killruddery? (n) How will development at Killruddery access public services such as public transportation, lighting, water and waste? (o) What guarantee is there that future developments will proceed? (p) The modifications do not meet the objectives of the DTO Strategy "A platform for Change", the Regional Planning Guidelines for the Greater Dublin Area or the National Spatial Strategy. (q) The Plan should include a number of identified policies and objectives contained in the Bray Town Development Plan. (r) How do the modifications fit into the policies and objectives of the County Wicklow Heritage Plan 2004-2008? (s) The Local Area Plan area should be included in the Bray Urban Habitat Mapping Document. (t) How do the proposals for Killruddery fit in the Heritage and Landscape policies and objectives of the County Development Plan. (u) Modification 6: Who are the members of the Integrated Planning Sub group of Wicklow County Development Board? Prior to any changes being made to the Plan the sub group should liaise with Bray Town Council, Councillors and the public. (v) There is little or no mention of addressing traffic issues on the Southern Cross Road.
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		<p>(w) There is no mention of public transportation in the modifications.</p> <p>(x) Any zoning or development in Killruddery must fit in with a future SAAO for the Sugarloaf areas.</p> <p>(y) Modification 11: The requirement for a walking route is welcomed but too vague, with no deadlines or targets set.</p> <p>(z) Modification 13: The open space (OS) lands at Killruddery should be for the residents of Southern Cross area as well and not just future Killruddery residents.</p> <p>(aa) Modification 17: a detailed phased development with clear conditions and timeframes is required. Modification 17 is too vague.</p> <p>(bb) The proposal to zone part of Killruddery for residential development should not occur.</p> <p>Response</p> <p>(a) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The submissions were dealt with in accordance with best practice and the provisions of the Planning Acts.</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. It is proposed in the future to seek to run both plans in tandem, as timeframes will allow.</p> <p>(c) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. Phasing is addressed in Section 14 of the Draft Plan, as amended by Modification 15, 16 and 17.</p> <p>(d) The dates are changed to reflect the fact that the Plan will be adopted in 2009 and not 2008.</p> <p>(e) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. All development in Killruddery is subject to an Action Area Plan as outlined in Section 14, and modified by Modification 17. The Action Area Plan will ensure the sustainable, phased and managed development of the demesne during the plan period.</p> <p>(f) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The Draft Local Area Plan compliments the Bray Town Development Plan.</p>
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		<p>(g) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(h) The Manager's considers this proposal sustainable.</p> <p>(i) The proposed Implementation Strategy is contained in section 14 of the Plan. Additional detail was added to the Strategy as part of Modification Nos. 15-17.</p> <p>(j) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The sustainable development of the environs of Bray will benefit the entire town.</p> <p>(k) This submission is not within the remit of this Local Area Plan.</p> <p>(l) The Planning Authority will ensure that surrounding residents are protected at planning application stage by assessing such issues as type and height of development, separation distances, potential for impact on residential amenity etc. The recommendation to increase the buffer zone will also assist in the protection of residential amenities.</p> <p>(m) Access to Killruddery will be provided as shown on map 5 through the existing access to the Demesne. This proposed access has not modified.</p> <p>(n) Details of public services must be provided as part of the Action Area Plan outlined in Section 14 Phasing and Implementation.</p> <p>(o) The function and purpose of a Local Area Plan is not to guarantee development, but rather, to facilitate future development when it occurs.</p> <p>(p) The Plan has full regard to the National Spatial Strategy, Regional Planning Guidelines and the DTO Strategy.</p> <p>(q) The rationale for the Draft Local Area Plan is to compliment the settlement of Bray and the policies and objectives contained in the Bray Town Development Plan</p> <p>(r) The Draft Plan at, in particular sections 10, 11 and 12 addresses the issues of heritage specific to the plan area. The overarching provisions of the County Heritage Plan apply to this Local Area Plan.</p> <p>(s) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p>
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		<p>(t) The Draft Plan at, in particular sections 10, 11 and 12 address the issues of heritage specific to the plan area. The overarching provisions of the County Heritage Plan apply to this Local Area Plan.</p> <p>(u) The current members of the Integrated Planning Sub Group of Wicklow County Development Board are Councillor G Jones, Mr J Lane (Director of Community & Enterprise, Ms D Whitfield AO Community & Enterprise, Member of the Forward Planning Section Wicklow County Council at Senior Level, Representative of the Health Services Executive, a Representative from the VEC and a Representative from the Gardaí (at Chief Superintendent Level). Any changes to the Plan will be done so by way of a statutory amendment. Full consultation will occur as part of this process. The latter part of this submission does not refer to a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(v) This submission does not refer to a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(w) This submission does not refer to a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(x) Regard will be had to any future SAAO designations in the Action Area Plan process.</p> <p>(y) Modification 11 should be read in conjunction with Modification 17 which requires the Action Area Plan for Killruddery to include the provision of a walking route through the estate to the Little Sugar Loaf mountain and west to the Demesne boundaries.</p> <p>(z) The open space is intended primarily for future adjoining residents, much like any open space areas in any housing estate. There will be no physical barrier to prevent residents from the wider area from using it.</p> <p>(aa) The purpose of a Local Area Plan is to establish a framework for the proper planning and sustainable development of an area. It should not dictate timescales of development for particular areas. The Action Area Plan outlined in Modification 17 will allow an agreed development framework between the Council and the designers of future development in Killruddery.</p> <p>(bb) The proposal to zone part of Killruddery for residential was approved by the Members of Wicklow County Council at their meeting on March 2nd, and legally cannot now be excluded. However, the objection is noted.</p>
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		<p>Recommendation</p> <p>It is recommended that the Tourism Zone objective and indicative uses are altered in order to allow the provision of allotments as per Modification 14 (Part B: Section 13 - Land Use Zoning Objectives, Page 19):</p> <p>Tourism (T) Objective: To provide for tourist and community related activities focused on Kilruddery House and Demesne. Vision: This zoning objective seeks to facilitate and provide for the sustainable development of Kilruddery House and Demesne, a Demesne of local and regional importance in the interests of the economic, social, educational, historic, physical and cultural benefit to the Demesne and the greater environs. Such Tourist Uses include: Tourist and community related activities, as appropriate within the context of the surrounding Demesne environment, including restaurant/tea rooms, craft factory outlet shops, heritage centre, farm shop/farmers market, allotments, walled garden restoration, equestrian centre, in accordance with the County Development Plan and this LAP.</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
5, 10, 15	Cosgrave Developments	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>Modification 10: (a) The inclusion of quantitative limits in the LAP duplicates a function of the building regulations, and potentially locks these standards in for the duration of the plan, notwithstanding improved standards necessitated by updated Building Regulations. The LAP should include qualitative rather than quantitative standards and objectives.</p> <p>Modifications 5 and 15: (b) With regard to the provision of the enterprise centre of 2,750 sq m, it is suggested that the masterplanning stage is a more appropriate stage to specify the size and timing of specific types</p>

		<p>of employment use at Fassaroe.</p> <p>Response</p> <p>(a) It is considered appropriate for the Local Area Plan to include specific energy conservation standards with regard to improvements to the Building Regulations. The proposed standards will also ensure consistency with the standards adopted by Bray Town Council, thus ensuring that lower energy conservation standards are enforced on one side of the boundary from the other.</p> <p>(b) It is considered appropriate for the Local Area Plan to include some absolutes with regard to the phasing of employment use. In this regard, the early delivery of a much needed enterprise centre is considered important for the sustainable development of Fassaroe and the wider Bray area.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
17, M4	Pat Costello	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) The proposed 10 metre buffer zone is inconsistent with the existing earth bank of approximately 30 metres.</p> <p>(b) The proposal to plant evergreen trees along this buffer zone would be detrimental to residential amenity by blocking light from gardens.</p> <p>(c) The proposed events centre will cause noise and traffic, it should be more limited in size.</p> <p>(d) The Southern Cross Route is already congested with traffic, the entrance to the new development should be from the entrance off Windgates Road.</p> <p>Response</p> <p>(a) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(b) The evergreen trees are considered necessary as these will provide visual screening during the winter months. The type and location of such trees so as to avoid overshadowing impacts will be agreed during the Action Area Plan stage.</p> <p>(c) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. There is no</p>

		<p>mention of an Event Centre in the Draft Local Area Plan or the Modifications Report.</p> <p>(d) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Killruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
7, 13, 17	Deepdales Residents Association	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) The limiting of development to below the 65 metre contour line is welcomed.</p> <p>(b) The linking of provision of residential development to the financial viability of the Killruddery demesne is welcomed.</p> <p>(c) The Open Space zoning in Killruddery is welcomed.</p> <p>(d) The council’s objective to prepare an SAAO for the Little Sugar Loaf is supported.</p> <p>(e) The possibility of traffic access through Deepdales, other estates, and Giltspur lane should be eliminated. Access to the new residential zoning should be via the existing main entrance to Killruddery Demesne, with modifications.</p> <p>Response</p> <p>(a)-(d) The support of Deepdales Residents Association is noted.</p> <p>(e) It is envisaged that vehicular access to the proposed development in Killruddery Demesne will be through the existing access from the Bray Southern Access Route. This should be clarified in the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is added to the</p>

		<p>Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery House from the Bray Southern Cross Route.
N/A	Department of Communications, Energy and Natural Resources	<p>Submission</p> <p>The submission states that the Engineering Division has no objections to the proposed modifications, and considers that environmental issues have been satisfactorily addressed in the SEA Environmental Report Addendum II.</p> <p>Response</p> <p>This submission is noted.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
6	Forward Planning Section of Department of Education	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) It is agreed that land should be reserved for two primary schools, and the quantum is considered sufficient. However, these should be provided in multiples of 8 classrooms, as there are 8 classes groupings between junior infants and 6th class.</p> <p>(b) It is proposed that land be reserved, in plots of between 1.14 and 1.6 ha for each, for 2x16 classroom primary schools instead of 1x12 classroom and 1x24 classroom school.</p> <p>(c) It is noted that the location, proximate to residential development, will be finalised at masterplanning stage.</p> <p>Response</p> <p>(a)-(c) It is agreed that the above should be modified to reflect the requirements of the Department of Education.</p> <p>Recommendation</p> <p>It is recommended that Modification 6, Part B, Section 9, Social and Community Infrastructure, Page 12 shall be amended to read:</p> <ul style="list-style-type: none"> A minimum of c. 3 ha shall be reserved for the provision of 2 no. primary schools within the Fassaroe area. It is a specific objective to provide a 2 x 16 classroom primary school requiring plots of between 1.14 ha. and 1.6 ha. The location of the primary schools, proximate to residential development, will be decided during the Masterplanning stage.

<p>General</p>	<p>Spatial Policy Section, Department of the Environment Heritage and Local Government</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) No screening for appropriate assessment was carried out, without which the plan will be subject to legal challenge. (b) There is a discrepancy between the target populations in the draft LAP and in Variation no. 10 of the County Development Plan. The matter should be clarified in one or the other. (c) The amendments do not address the matter of Greenhouse Gasses. (d) The amendments do not address the issue of adopting a sequential approach to development, and the requirement to provide necessary physical and social infrastructure prior to other development. <p>Response</p> <ul style="list-style-type: none"> (a) In compliance with the Habitats Directive, the draft Plan and amendments have undergone Appropriate Assessment Screening Exercises and an Appropriate Assessment Screening Document will be made available alongside the Plan and Environmental Report when adopted. (b) The Bray Town Plan projects a population of 31,000 persons in the Town Council area by 2016 and provides for sufficient zoned land and services to accommodate that population (the 2006 Census population for the Bray Town Council area was 27,041). <ul style="list-style-type: none"> - The draft Bray Environs LAP provides for new population in the Kilruddery and Fassaroe areas of 6,854 persons (max). There is however already an existing population of 1,773 persons in the Bray Environs area (according to 2006 Census). Therefore the Bray Environs LAP allows for a population of up to 8,627 persons in the Environs area. - It is therefore necessary to increase the population target for Bray (which include the Town Council and Environs areas) 2016 to 40,000 <p>It should also be noted that a complete analysis of County population and growth up to 2022 will be carried out as part of the review of the 2004 County Development Plan and it will be through that process that any additional growth in the population of Bray & Environs will be determined. However, in order to ensure that the Bray Environs LAP remains consistent with the County Development Plan, it is recommended that the population target for 2016 be increased to 40,000. The draft Bray Environs LAP has addressed any traffic, retail, environmental or other implications impacts associated with the proposed increase in population in the Environs area.</p> (c) The issue of Greenhouse Gasses has been addressed as a new policy objective under 'Energy, Communications & Recycling
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		<p>networks', proposed as Modification 10.</p> <p>(d) Given that most of the development is proposed in the Fassaroe and Kilruddery areas, it is believed that phasing of development is best considered the masterplans for both areas. A comprehensive sequential approach to development can be appropriately delivered through detailed masterplans.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
<p>2, 3, 9, 17, M4</p>	<p>Rory Donnelly</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) No business plan has been submitted to justify the viability of the tourism rezoning.</p> <p>(b) It is feared that the Tourism rezoning is a ruse to permit residential development.</p> <p>(c) The 10m buffer zone is insufficient to mitigate the increase in noise and traffic. The bank to the rear of the houses in Swanbrook should be maintained to shield lights from cars leaving the proposed car park, and for aesthetic reasons.</p> <p>(d) The events centre will put a strain on the road network.</p> <p>(e) There is a lack of evidence of good business sense in the management of the Killruddery Demesne.</p> <p>Response</p> <p>(a) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The Action Area Plan and phasing pertaining to development in Kilruddery will ensure the comprehensive and sustainable development of the Demesne.</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(c) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(d) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. There is no mention of an Event Centre in the Draft Local Area Plan or the Modifications Report.</p> <p>(e) This submission refers to the Draft Plan and not a specific</p>

		<p>modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
7, 17	Karen Downer	<p>Submission</p> <p>(a) Concern regarding the reduction of the buffer zone running behind the housing estates Swanbrook, Hollybrook and Deepdales from 30m to 10m.</p> <p>(e) The addition of an events centre.</p> <p>(c) Planned traffic route using the same exit and entry point is not suitable for such a residential area and no amendments to original proposals should be looked at until the traffic route through both Kilruddery Estate and along the SCR are addressed.</p> <p>Response</p> <p>(a) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(b) Neither the draft LAP or the modifications report make reference to an event centre.</p> <p>(c) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Access Route. This should be clarified in the Draft Plan.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p>

		<ul style="list-style-type: none"> The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery from the Bray Southern Cross Route.
<p>2, 3 M1, M3, M4</p>	<p>Murray O'Laoire Architects on behalf of the Earl of Meath and the Brabazon family</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) It is proposed that the 10 metre buffer zone should be continued along the Killruddery boundary, to provide a 10 metre buffer between the R3 residential zone and adjacent properties.</p> <p>(b) Any reduction in area or density of the proposed R3 zone will undermine the overall project and its viability.</p> <p>Response</p> <p>(a) An increased buffer zone of 30m as opposed to 10m, is considered appropriate between the R3 zone and the Hollybrook housing development.</p> <p>(b) No change to the area or density of the proposed R3 zone is being recommended.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and</p>

		extended buffer zone.
N/A	Environmental Protection Agency	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) Consideration should be given to the “potential adverse effects” and mitigation thereof with regard to the proposed 2750 sq m Enterprise Centre at Fassaroe and the proposed rezoning of lands at St Valery Fassaroe from Green Belt to R2 New Residential. (b) An Appropriate Assessment should be considered with regard to Ballyman Glen cSAC. (c) Provisions should be made in the Local Area Plan for the incorporation of specific objectives and measures set out in the Draft Eastern River Basin District - River Basin Management Plan and associated Programme of Measures. (d) It is a matter for Wicklow County Council to ensure that they are compliant with the requirements of national and EU environmental legislation. (e) An SEA Statement is required outlining “Information on the Decision” as required by Article 141 of the Planning and Development Regulations, as amended by Article 8 of the SEA Regulations. <p>Response</p> <ul style="list-style-type: none"> (a) These proposals were evaluated in Addendum II to the Environmental Report. This evaluation will be used in order to update the Environmental Report on adoption of the Plan. The Enterprise Centre would be likely to have positive environmental effects with regard to minimising increases in travel related greenhouse emissions to air and reducing the overall proportion of car dependency within the County and wider region. The Enterprise Centre would be also likely to have the potential to cause adverse effects however such effects would be mitigated through compliance with measures integrated into the Plan, including those recommended by the Environmental Report. The development of the lands at Fassaroe would have the potential to cause adverse effects upon non-designated biodiversity and flora and fauna and the landscape however such effects would be mitigated through compliance with measures integrated into the Plan, including those recommended by the Environmental Report. (b) In compliance with the Habitats Directive, the draft Plan and amendments have undergone Appropriate Assessment Screening Exercises and an Appropriate Assessment Screening Document will be made available alongside the Plan and Environmental Report when adopted. (c) Section 9 (<i>Mitigation Measures</i>) of the Environmental Report recommends a measure for integration into the Plan to this effect. The Environmental Report is considered part of the Local Area Plan.

		<p>(d) Compliance with the requirements of national and EU environmental legislation is inherent to a number of Plan provisions. In order to help to ensure that both the Plan and developments arising from the Plan are in compliance with national and EU legislation it is recommended - as per Section 9 (<i>Mitigation Measures</i>) of the Environmental Report - that mitigation measures are integrated into the Plan as policies or objectives in their entirety.</p> <p>(e) When the Draft Plan is adopted an SEA Statement will be produced and made available in compliance with the relevant legislation.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
<p>7, 14, 17, M4</p>	<p>Jane and Tom Fenlon</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) There has been a lack of information and consultation with residents of Swanbrook.</p> <p>(b) The publication of the background issues paper in December 2007 and the public consultation on February 7th 2008 were inadequately advertised.</p> <p>(c) The range of uses permitted within the tourism zoning should be appropriate within the context of neighbouring housing estates, as well as the surrounding demesne environment.</p> <p>(d) The buffer zone should be at least 40 metres, not 10, and no planting should be carried out without consultation with adjoining properties.</p> <p>(e) The introduction of traffic and car parking to Killruddery estate will interfere both with the quiet residential areas and with the tranquil scenic nature of the demesne.</p> <p>(f) An EIS is a necessity for development in Killruddery.</p> <p>Response</p> <p>(a) The Modifications and all other public consultations were carried out fully in accordance with the Planning and Development Act 2000 (as amended).</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(c) The Planning Authority will ensure protection of the neighbouring residential estates through the Action Area Plan and assessments of all future planning applications.</p> <p>(d) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook</p>

		<p>and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(e) The introduction of traffic and car parking in Killruddery estate will result in some impacts on the estate. The Planning Authority will ensure that such impacts are to acceptable levels on both the Demesne and neighbouring residential estates through the Action Area Plan and assessments of all future planning applications.</p> <p>(f) If future development is of the type that requires an EIS or exceeds the thresholds set in the Planning and Development Act 2000, an EIS will be required.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Killruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
<p>2, 7, 11, 13, 17, M3</p>	<p>Aidan J. ffrench</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) The Manager’s Report on the draft LAP should have listed the submissions, not just the names of those who made submissions.</p> <p>(b) The LAP fails to provide joined-up sustainable planning with Bray town. The Plan should have been carried out at the same time as the Bray Town Development Plan.</p> <p>(c) It is too vague, does not comply with national or international guidance documents, and should include traffic modelling.</p> <p>Modification 2:</p> <p>(d) There is no justification for the increase in density, adjacent to a designated area of high amenity.</p> <p>(e) The increased density will lead to increased demand for services, and increased traffic.</p> <p>(f) Given the current conditions in the housing market, the advisability of rezoning land for increased density of residential units should be reconsidered, as this may not be an appropriate way to finance the rest of the development. An economic analysis should be undertaken.</p>

		<p>Modification 7:</p> <ul style="list-style-type: none"> (g) There is no mention of addressing existing road traffic capacity problems on the Southern Cross Road (h) There is no mention of Public Transport in relation to the proposed modifications. (i) As Minister Gormley has directed Wicklow County Council to progress plans for the SAAO of the Sugarloaf areas, the development of high density housing in the Kilruddery estate is inappropriate and contradicts the SEA on the draft Bray LAP. <p>Modification 11:</p> <ul style="list-style-type: none"> (j) Modification 11 is welcomed in principle, as the only modification that is of benefit to the general public and residents, but it is too vague. <p>Modification 13:</p> <ul style="list-style-type: none"> (k) The open space area envisioned as an amenity for the residents of the newly zoned lands should be accessible to all the residents of the southern cross area. <p>Modification 17:</p> <ul style="list-style-type: none"> (l) The proposed area zoned T, at 9 hectares is too large. The area should be smaller, and the buffer zone should be 25-50 metres, not 10 metres, to protect the amenity of neighbouring estates. (m) There is a lack of any policies in the modifications which refer to Bray Town. The LAP for the environs should be carried out in an integrated fashion with the councillors and residents of Bray Town. The LAP in its current guise is an outmoded model of developer-led local area planning. <p>Response</p> <ul style="list-style-type: none"> (a) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. The submissions were dealt with in accordance with best practice and the provisions of the Planning Acts. (b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. It is proposed in the future to seek to run both plans in tandem, as timeframes will allow. (c) The Plan has full regard to the National Spatial Strategy, Regional Planning Guidelines, the DTO Strategy, the Wicklow County Development Plan and Bray Town Development Plan. Traffic modelling is considered more appropriate for masterplanning and planning application stages than a Local Area Plan. (d) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6
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		<p> dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. All development in Killruddery is subject to an Action Area Plan as outlined in Section 14, and modified by Modification 17. The Action Area Plan will ensure the sustainable, phased and managed development of the demesne during the plan period.</p> <p>(e) The low number of residences will not create any services or traffic issues in the area.</p> <p>(f) An economic analysis is beyond the remit of a Local Area Plan. The Action Area Plan and phasing requirements therein will ensure that the Demesne is development in a comprehensive and sustainable manner.</p> <p>(g) This submission does not refer to a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(h) This submission does not refer to a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications.</p> <p>(i) Regard will be had to any future SAAO designations in the Action Area Plan process. The development of a small number of low density houses is not envisaged to have any impact on the SAAO designations.</p> <p>(j) Modification 11 should be read in conjunction with Modification 17 which requires the Action Area Plan for Killruddery to include the provision of a walking route through the estate to the Little Sugar Loaf mountain and west to the Demesne boundaries.</p> <p>(k) The open space is intended primarily for future adjoining residents, much like any open space areas in any housing estate. There will be no physical barrier to prevent residents from the wider area from using it.</p> <p>(l) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(m) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications. The Draft Local Area Plan compliments the Bray Town Development Plan.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p>
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		<ul style="list-style-type: none"> The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
<p>2, 3, 9, 11, 14, 17, M4</p>	<p>Jacinta and Paul Fitzsimons</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) As with the original draft plan, the modified plan is unclear on access to the new residential development in Killruddery. (b) Neither pedestrian nor vehicular access should be permitted via Hollybrook Park, to avoid increasing traffic, noise and reduction in property values. (c) The increased density is unwarranted given the lack of public transport and inadequate roads. (d) The reconfigured residential zoning will have a disastrous effect on the privacy of Hollybrook Park. The proposed location will be visually obtrusive. <p>Response</p> <ul style="list-style-type: none"> (a) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Access Route. This should be clarified in the Draft Plan. (b) No pedestrian or vehicular accesses are proposed through the Hollybrook or Swanbrook housing estates. Map 5 should be altered to clarify this point. (c) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. (d) All development in Killruddery is subject to an Action Area Plan as outlined in Section 14, and modified by Modification 17. The Action Area Plan will ensure the sustainable, phased and managed development of the demesne during the plan period. The Planning Authority will further ensure through the assessment of any planning applications, that Hollybrook Park is unaffected by any future development in Kilruddery Demesne. The proposed increased and extended buffer zone will also assist in the protection of privacy at this location.

		<p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone, and to remove the indicative walking route shown entering the open space adjoining Hollybrook housing estate.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery from the Bray Southern Cross Route.
<p>2, 3, 9, 11, 14, 17, M4</p>	<p>Denise Heffernan</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>Modifications 17:</p> <p>(a) The maps contradict the written document. The latter only refers to a buffer between Kilruddery and Swanbrook.</p> <p>(b) There should be a buffer zone between Hollybrook Park and the Killruddery T zone of approx 30 metres to provide a noise and visual barrier.</p> <p>(c) There should be no building within the buffer zone.</p> <p>Modifications 2 & 3:</p> <p>(d) There should be no increase in density.</p> <p>(e) The proximity of the proposed development to Hollybrook Park will have detrimental impacts on visual amenity and property values.</p> <p>(f) No access should be provided from Hollybrook Park.</p> <p>Modification 9:</p> <p>(g) A full flood risk assessment should be carried out for all developments.</p> <p>Modification 11:</p> <p>(h) No pedestrian or vehicular access should be allowed to an internal walk within Killruddery estate via Hollybrook Park, to dissuade transient non-locals and to avoid increasing anti-social behaviour</p>

		<p>perpetrated by non-locals in Hollybrook Park.</p> <p>Response</p> <p>(a) In order to avoid confusion, the written statement should be changed to also refer to Hollybrook with regard to the buffer zone.</p> <p>(b) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(c) It is not intended that the buffer zone would be built on including any roads and footpaths.</p> <p>(d) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area.</p> <p>(e) The Planning Authority will ensure through the Action Area Plan for Kilruddery and through the assessment of any planning applications, that Hollybrook Park is unaffected by any future development in Kilruddery Demesne.</p> <p>(f) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Access Route. This should be clarified in the Draft Plan. Pedestrian access is recommended however to encourage permeability in this area.</p> <p>(g) A full Flood Risk Assessment for Kilruddery Demesne must be undertaken prior to the commencement of any development as part of as part of the masterplan and subsequent planning applications that must be prepared for the Demesne (see Modification no. 9). The requirement for a certificate for sites under 0.25 hectares is merely to ensure that small developments such as house extensions do not require a full Flood Risk Assessment.</p> <p>(h) No pedestrian or vehicular accesses are proposed through the Hollybrook or Swanbrook housing estates. Map 5 should be altered to clarify this point.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to
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		<p>a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses.</p> <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone. The indicative walking route shown entering the open space adjoining Hollybrook housing estate should be removed.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery from the Bray Southern Cross Route.
<p>2, 3, 9, 11, 14, 17, M4</p>	<p>Hollybrook Park Residents Association (submission 23) and identical letters from individual residents of Hollybrook (submissions 24-44)</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>Modifications 2 and 3:</p> <p>(a) There is no mention of where access to the residential development will be, and it is feared that vehicular access through Hollybrook Park will have a detrimental impact on quality of life through increased traffic and noise, thereby reducing property values.</p> <p>(b) The movement of the residential site will impact negatively on privacy, property values and drainage problems in Hollybrook. Any residential development should be confined to the original proposed location.</p> <p>(c) The increased density is unwarranted, and will exacerbate existing deficits in the road network and public transport. Higher quality units in smaller numbers would be preferable.</p> <p>(d) The county manager is not giving sufficient regard to numerous objections from residents, in favour of one landowner.</p> <p>Modification 9:</p> <p>(e) A full Flood Risk Assessment should be carried out for any development, even those of less than 0.25 hectares.</p> <p>Modification 11:</p> <p>(f) No pedestrian or vehicular access should be allowed to an internal walk within Killruddery estate via Hollybrook Park, to dissuade transient non-locals and to avoid increasing anti-social behaviour perpetrated by non-locals in Hollybrook Park.</p> <p>Modification 14:</p>

		<p>(g) The buffer zone between the new zoning and Swanbrook and Hollybrook should be 30 metres, not 10 metres, to protect existing residential amenity and minimise noise nuisance. The map appears to contradict the written statement as only Swanbrook is referred to in the written statement.</p> <p>(h) Tourism Development should be 30 metres from buffer zone.</p> <p>(i) There should be a buffer zone of 30 metres, including the existing grass mound, between Hollybrook Park and any development in the R3 zoning.</p> <p>(j) Buffer zone should never be built on.</p> <p>Response</p> <p>(a) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Access Route, as shown on Map 5. This should be clarified in the Draft Plan.</p> <p>(b) The Planning Authority will ensure through the Action Area Plan for Kilruddery and through the assessment of any planning applications, that Hollybrook Park is unaffected by any future development in Kilruddery Demesne. Modification 17 should be amended to increase the buffer zone to 30 metres.</p> <p>(c) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. All development in Killruddery is subject to an Action Area Plan as outlined in Section 14, and modified by Modification 17. The Action Area Plan will ensure the sustainable, phased and managed development of the demesne during the plan period.</p> <p>(d) The provisions of the Draft LAP and the policies and objectives therein represent the most orderly and sustainable approach to the anticipated growth of Bray Environs into the future, following extensive consultation with stakeholders, other interested bodies, and the general public. The Plans proposed represent the most sustainable approach to the development of the Plan area based on national, regional and county planning policy and guidance, and the concerns and opinions expressed during the course of preparing the draft Plan.</p> <p>The policies and objectives of the Plan have not been unduly influenced by any developer or stakeholder in the area over any other, and it is the belief of Wicklow County Council that the Plan has been prepared in the most transparent manner possible and in accordance with the requirements of the Planning & Development Acts, 2000-2007.</p> <p>(e) A full Flood Risk Assessment for Kilruddery Demesne must be</p>
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		<p>undertaken prior to the commencement of any development as part of the masterplan and subsequent planning applications that must be prepared for the Demesne. The requirement for a certificate for sites under 0.25 hectares is merely to ensure that small developments such as house extensions do not require a full Flood Risk Assessment.</p> <p>(f) No pedestrian or vehicular accesses are proposed through the Hollybrook or Swanbrook housing estates. Map 5 should be altered to clarify this point.</p> <p>(g) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(h) A 60 m buffer for tourism development is considered excessive. The newly proposed buffer zone of 30m is considered appropriate.</p> <p>(i) A buffer zone of 30m between existing and future residential development is considered appropriate.</p> <p>(j) It is not intended that the buffer zone would be built on including any roads and footpaths.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone. The indicative walking route shown entering the open space adjoining Hollybrook housing estate should be removed.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery House from the Bray Southern Cross Route.
2, 3, 7,	Dr Caoimhin	Submission

<p>9 and 17</p>	<p>MacMaolain</p>	<p>a) Concerned about the proposal to move the residential development closer to Hollybrook Park.</p> <p>b) Concerned about the increases in housing density and possible public access to the residential development and walkways in Kilruddery via Hollywood Park.</p> <p>c) The estate suffers from very poor drainage and flooding and this risk would be likely to increase further should houses be built behind us.</p> <p>d) The new houses would detrimentally affect the current residents' views of the mountain and diminish the tranquil atmosphere of the estate.</p> <p>Response</p> <p>(a) & (d) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(b) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area.</p> <p>(c) A full Flood Risk Assessment for Kilruddery Demesne must be undertaken prior to the commencement of any development as part of as part of the masterplan and subsequent planning applications that must be prepared for the Demesne (see Modification no. 9). The requirement for a certificate for sites under 0.25 hectares is merely to ensure that small developments such as house extensions do not require a full Flood Risk Assessment.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>

<p>2, 3, 9, M4</p>	<p>Blaithin Murphy</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) The reconfigured residential zoning should have been advertised in newspapers. (b) There is no information on vehicular access to the rezoned land, and the rezoning is premature until the access is finalised. Vehicular access should not be permitted via Hollybrook Park for up to 307 residents, to avoid increasing traffic, noise and danger to children playing. (c) The rear garden of 98 Hollybrook Park has suffered flooding, including flash flooding in August 2008, photos and videos provided. Developing the lower slopes of the Little Sugarloaf would increase the flooding problem. Department of the Environment Guidelines should be adhered to. There should be no relaxation of flood risk assessment. <p>Response</p> <ul style="list-style-type: none"> (a) The proposed modifications were advertised in a local newspaper as per the requirements of the Planning and Development Act 2000 (as amended). (b) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Cross Route, as shown on Map 5. This should be clarified in the Draft Plan. (c) A full Flood Risk Assessment for Kilruddery Demesne must be undertaken prior to the commencement of any development as part of the masterplan and subsequent planning applications that must be prepared for the Demesne (as per Modification 9), to prevent flooding problems occurring on the site or adjoining it. The requirement for a certificate for sites under 0.25 hectares is merely to ensure that small developments such as house extensions do not require a full Flood Risk Assessment. <p>Recommendation</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access from the Bray Southern Cross Route.
<p>17, M4</p>	<p>Fiona Murphy</p>	<p>Submission</p> <p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) The buffer zone of 30 metres, may or may not have been

		<p>adequate, the buffer zone of 10 metres is certainly inadequate.</p> <p>(b) The proposed events centre will cause noise and traffic on the Southern Cross Road, and will be detrimental to the residential amenity of neighbouring estates, it would be more appropriate where the hotel was intended.</p> <p>(c) The existing Killruddery entrance is inadequate to cope with 250,000 visitors to the tourism centre, plus 120 houses, plus an events centre.</p> <p>Response</p> <p>(a) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point.</p> <p>(b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. There is no mention of an event centre in the Draft Local Area Plan or the Modifications Report.</p> <p>(c) The Action Area Plan for Kilruddery and any subsequent planning applications will have to prove that the access to the Demesne is adequate to cater for all existing and proposed development. There is no mention in the Draft Local Area Plan of an event centre.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
<p>1, 2, 6, 11, 13, 17</p>	<p>Paul Murray and Yvonne McGuire</p>	<p>Submission</p> <p>The submission supports the points made in the submission by Councillor Caroline Burrell.</p> <p>Response</p> <p>A detailed response to the submission by Councillor Caroline Burrell is</p>

		<p>addressed above.</p> <p>Recommendation</p> <p>It is recommended that the Tourism Zone objective and indicative uses are altered in order to allow the provision of allotments as per Modification 14 (Part B: Section 13 - Land Use Zoning Objectives, Page 19):</p> <p>Tourism (T) Objective: To provide for tourist and community related activities focused on Kilruddery House and Demesne. Vision: This zoning objective seeks to facilitate and provide for the sustainable development of Kilruddery House and Demesne, a Demesne of local and regional importance in the interests of the economic, social, educational, historic, physical and cultural benefit to the Demesne and the greater environs. Such Tourist Uses include: Tourist and community related activities, as appropriate within the context of the surrounding Demesne environment, including restaurant/tea rooms, craft factory outlet shops, heritage centre, farm shop/farmers market, allotments, walled garden restoration, equestrian centre, in accordance with the County Development Plan and this LAP.</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p>
N/A	Eanna O Floinn	<p>Submission</p> <ol style="list-style-type: none"> Kilruddery has always contributed richly to the cultural, social and economic life of Bray. The plan is attractive and in keeping with environmental concerns. The development will provide employment, both in its construction and in the future. The housing estate in which we now live is built on lands once forming part of Kilruddery. It would be hypocritical to insist that the development of our housing estate had merit, but any further development has none. Would rather Kilruddery Estate remained in current ownership and be developed by them rather than transferred to others less responsible. Kilruddery has always treated its neighbours generously, not

		<p>least in the provision of walking permits when other land owners are restricting access to their lands.</p> <p>Response</p> <p>The submission is noted.</p> <p>Recommendation</p> <p>No change.</p>
7, 9, 11, 14, 17, M3, M4	Rob Goodbody on behalf of the Residents of Swanbrook, Hollybrook Park and Deepdales Estates.	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>(a) There has been poor consultation during the making of this plan, and residents have been thus denied the opportunity to make representations at vital early stages.</p> <p>Modification 14:</p> <p>(b) While the apparent 'tightening up' of permitted uses in the tourism zone is noted, there is a concern that a proposed event centre will lead to late night functions and parties. This type of function should not be permitted, to protect residential amenity in neighbouring estates.</p> <p>Modification 17:</p> <p>(c) The proposed buffer zone of 10 metres is inconsistent with the local topography, consisting of a raised bank of some 33-40 metres. The existing mound should be retained, planting should be confined to the slope furthest from the houses and should be designed to absorb noise. The bank should be reinforced at its lowest points.</p> <p>(d) The proposal to plant evergreen trees is inappropriate in an area with broadleaf deciduous trees, and would be oppressive for neighbouring gardens.</p> <p>Map change M4:</p> <p>(e) Access to the reconfigured residential zoning has not been resolved, and this is too fundamental an issue to leave to masterplanning stage. No access should be permitted via the existing residential estates.</p> <p>(f) The reconfigured residential zoning is poorly conceived. It is unlikely to be viewed as attractive residential area by prospective buyers, and may not provide the capital needed to finance the other aspects of development.</p> <p>Modification 11:</p> <p>(g) The proposed walking route would create security problems for adjoining properties.</p> <p>Modification 7:</p> <p>(h) Given the intentions expressed in the media, of attracting 250,000 visitors a year to Killruddery, the implications for traffic are severe. This would be a car- or coach-dependent attraction,</p>

		<p>being 3 kilometres from the DART station at Bray. The LAP is incomplete without proposals to resolve the already significant traffic problems on the Southern Cross Road.</p> <p>Modification 9:</p> <ul style="list-style-type: none"> (i) There is significant potential for flooding arising from new development in the Killruddery area, due to the proximity of the Swan Brook. The deferral of flood mitigation measures to Masterplan stage is inappropriate, as this is not subject to public consultation, and those at risk of flooding will not be in a position to make representations. (j) An EIA should be carried out for the proposed development of Killruddery Demesne, addressing noise, traffic and access. (k) The issues outlined above are too serious to be left to masterplan stage, and the present plan does not give full consideration to all the implications of the proposals. <p>Response</p> <ul style="list-style-type: none"> (a) All stages of public consultation have been carried out fully in accordance with the Planning and Development Act 2000 (as amended). In addition, an advertised public consultation was organised prior to the preparation of the plan. (b) The objective for the tourism zone is clear in its objective to provide for tourist related activities focused on Killruddery House and Demesne. Functions or parties that are not related to such tourism activities will not be permitted. (c) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point. (d) The evergreen trees are considered necessary as these will provide visual screening during the winter months. The type and location of such trees so as to avoid overshadowing impacts will be agreed during the Action Area Plan stage. (e) It is envisaged that vehicular access to the proposed development in Killruddery Demesne will be through the existing access from the Bray Southern Access Route. This should be clarified in the Draft Plan. (f) The R3 zoning is considered an ideal area for low density residential development. It is a logical extension of residential areas to the north-east and is proposed on relatively low-lying ground that will not detract from the amenity of the Little Sugarloaf. It will also result in minimal tree loss. (g) The proposed walking route will increase permeability, increase passive surveillance and reduce the potential for anti-social behaviour, with corresponding benefits for security in the area. It considered reasonable that the pedestrian route will not connect
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		<p>into the Swanbrook or Hollybrook housing estates.</p> <p>(h) The Action Area Plan for Kilruddery, together with all planning applications will have to prove that there is adequate capacity on the Bray Southern Cross Road to cater for all future development in the Demesne. This will include an envisaged modal split for transportation.</p> <p>(i) A full flood assessment is most appropriate at masterplanning stage, as it will only be apparent at this stage, the full extent of development envisaged at Kilruddery.</p> <p>(j) If future development is of the type that requires an EIS or exceeds the thresholds set in the Planning and Development Act 2000, an EIS will be required.</p> <p>(k) The purpose of a Local Area Plan is to establish a framework for the proper planning and sustainable development of an area. It is considered that a Masterplan and planning application is the most appropriate method of resolving detailed issues such as the extent of development and the impacts thereof on services, amenities, traffic and the Demesne itself.</p> <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone. The indicative walking route shown entering the open space adjoining Hollybrook housing estate should be removed.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery House from the Bray Southern Cross Route.
2, 3	Riddlesford	Submission

	<p>Residents Association</p>	<p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) Increased number of residential units together with the proposed tourism facilities will lead to increased traffic volumes, which will be detrimental to the already busy Southern Cross Road, and compromise the future of the area as a tourism destination. (b) Increased number of residential units will result in increased demand for services, infrastructure and maintenance, and the diversion of resources from existing residential estates. (c) Existing residential developments and green spaces need to be maintained, prioritised and redeveloped, before the rezoning of more Greenfield sites. (d) All Bray Town Councillors should be allowed vote on the plan, not just those who are also members of Wicklow County Council. (e) It is recognised that Killruddery is a tremendous asset to the people of Bray. The realisation of its full potential must be done in a sustainable manner without <p>Response</p> <ul style="list-style-type: none"> (a) The Action Area Plan for Kilruddery, together with all planning applications will have to prove that there is adequate capacity on the Bray Southern Cross Road to cater for all future development in the Demesne. (b) The increased number of residential units proposed is not considered significant. The County Council will ensure through the Action Area Plan and planning application process that there are adequate public services to cater for the proposed development, without any detriment to existing residential development. (c) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications. (d) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications. It is a statutory function of the Members of Wicklow County Council to adopt the Local Area Plan. (e) The purpose of the Action Area Plan is to ensure that all future development in Killruddery is carried out in a sustainable and comprehensive manner without detriment to the Demesne and surrounding residential estates. <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
2, 3,	Neal and	Submission

17, M2, M4	Lesly Thomson	<p>The submission makes the following suggestions:</p> <ul style="list-style-type: none"> (a) The buffer zone should be 30 metres rather than 10, to protect residential amenity. (b) No business plan was submitted for the tourism facility, and there is no indication of a holistic approach to development of the demesne. (c) There is no reason given for the increased density, which will compound traffic problems on the Southern Cross Road. An EIS should be submitted for any development proposed on the Killruddery demesne. (d) There is a lack of identified access to the proposed new zonings. Access via the existing cul de sac estates would be totally unacceptable, and access should be addressed at this stage. (e) There is no indication in the text of the land uses, if any, permitted in the zoning GB. <p>Response</p> <ul style="list-style-type: none"> (a) An increased buffer zone of 30m is considered appropriate along the western boundary of the Demesne adjoining the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses. Map 5 should be altered to clarify this point. (b) This submission refers to the Draft Plan and not a specific modification. The Manager's Report can only contain opinions and recommendations on the displayed modifications. (c) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. If future development is of the type that requires an EIS or exceeds the thresholds set in the Planning and Development Acts, an EIS will be required. (d) It is envisaged that vehicular access to the proposed development in Kilruddery Demesne will be through the existing access from the Bray Southern Access Route, as shown on Map 5. This should be clarified in the Draft Plan. (e) The indicative uses in the GB zone are set out in the Section 13.0 Part B, namely agricultural based uses and residential use in accordance with policy SS9 of the CDP. <p>Recommendation</p> <p>It is recommended that the following bullet point is altered in order to refer to Hollybrook and the increased buffer zone in Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The elevation of the residential development shall be confined to a contour of no higher than 65 metres. A 30 metre mixed
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		<p>deciduous and evergreen tree planted buffer zone shall be provided between the Kilruddery T zone and the Swanbrook and Hollybrook housing developments. The buffer will be extended west where it adjoins the southern boundary of the Hollybrook houses.</p> <p>It is recommended that Map 5 is changed to show the increased and extended buffer zone.</p> <p>It is recommended that the following bullet point is added to the Modification 17 (Part B: Section 14 - Phasing & implementation, Page 24-25):</p> <ul style="list-style-type: none"> • The Action Area Plan shall provide for a vehicular access to all proposed developments via the existing access to Kilruddery House from the Bray Southern Cross Route.
2, 3	Philip Wheatley	<p>Submission</p> <p>The submission makes the following suggestions:</p> <p>Modification 2 and 3:</p> <p>(a) These modifications further increase the number of residential units allowable under the plan.</p> <p>(b) As no amendments were made to the flawed proposals for Fassaroe, no comments are made at this stage.</p> <p>(c) The amended plan was not appropriately made available to the public, the amendments were not made available on www.wicklow.ie or in Greystones library.</p> <p>Response</p> <p>(a) The proposed increase in the maximum density will still result in a very low density development on the site (in the order of 6 dwellings per acre), resulting in a maximum of 120 dwellings. The low number of residences will not create any services or traffic issues in the area. All development in Killruddery is subject to an Action Area Plan as outlined in Section 14, and modified by Modification 17. The Action Area Plan will ensure the sustainable, phased and managed development of the demesne during the plan period.</p> <p>(b)-(c) These submissions are noted.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
4, 7,	Stephen	<p>Submission</p>

M7	Little on Behalf of George Wilkins	<p>The submission makes the following suggestions:</p> <p>Map Change M7: (a) The change from RE (existing residential) to R2 (new residential, medium to low density) is welcomed.</p> <p>Modification 4: (b) The provisions for noise attenuating structures are welcomed.</p> <p>Modification 15: (c) The exclusion of the submitter’s landholding from the obligation to make a masterplan is welcomed.</p> <p>(d) There are no policies or objectives in the proposed modifications to deal with setbacks from the N11. The County Development Plan states that the council may reduce building lines where the National Road is adjacent to employment zoned lands; however, no such provision is stated for residentially zoned lands.</p> <p>Response</p> <p>(a)-(c) These submissions are noted.</p> <p>(d) This submission refers to the Draft Plan and not a specific modification. The Manager’s Report can only contain opinions and recommendations on the displayed modifications. Such matters are relevant to the current variation No 10 of the County Development Plan.</p> <p>Recommendation</p> <p>No change to the proposed Modifications.</p>
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Modification Numbers	
<p>4. Dargle road noise attenuation structures</p> <p>8 . Incorporate bus priority measures in the design of new roads</p> <p>12. Include in the E2 and E3 zones “Green Waste and Timber Recycling”</p> <p>16. To include “The provision of the LUAS including its construction schedule shall be included in the Master Plan including agreed phasing.”</p> <p>Map 5 Change zoning of c.2.2 ha (c 5.4 acres) at ‘St Valery’, Fassaroe from ‘GB - green belt’ to ‘R2 - new residential medium to low density’.</p> <p>Map 6 Amend indicative road network lines such that all indicative routes end at Plan boundary.</p>	
Submission	No submissions
Manager’s Response	N/A
Manager’s Recommendation	Retain the inclusion of the above