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**What area does your submission relate to?**

Town & Village Plans

**Your comments**

Submission on County Development Plan Review from Bray Head Residents' Association attached

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[Bray Head Residents Assn Co Devt Plan 2021-27 Phase 1 submission Jan 2020.pdf](#)

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2020-01-09

# Bray Head Residents' Association



## Submission for Stage 1 of the preparation of the County Wicklow Development Plan 2021-2027

1. The Bray Head Residents' Association (BHRA) appreciated the opportunity to attend a briefing meeting on the Public Consultation phase of the Wicklow Development Plan and welcomes the opportunity to submit the following submission to Stage 1 of the development plan process.

### **Amenity Value of Bray Head**

2. As the name indicates, our organisation's remit is focused on the Bray Head area and we recognise that detailed development plans for the Bray area will occur later in the process. However, as a designated Special Area of Conservation of local, National and European importance protected under the EU Habitats Directive and a Special Amenity Area Order, the preservation and enhancement of Bray Head is of strategic importance to the development of County Wicklow and, as such, requires particular consideration in the drafting of the County Development plan.
3. For generations, the climb up Bray Head or the walk along the cliff walk from Bray to Greystones have been leisure activities of choice for thousands of locals, Dubliners and tourists. For many, this is their first – and often only – experience of the riches of the Wicklow hills and coastal landscape.
4. “First impressions last”, and the more memorable and pleasant this experience is the more likely people are to return and to be positively disposed to further exploration of other areas of the County. Thus, the effective management and appropriate enhancement of the Bray Head area is a crucial building block in the development of Wicklow's outdoor leisure amenities. In this context it is imperative that:
  - a) Development and enhancement of the area is kept strictly in line with the requirements of the SAAO and that any unauthorised development is dealt with in a manner that adheres to SAAO requirements.
  - b) Adequate resources are made available for the implementation of the Management Plan for the area. Resources are required to:
    - i. improvement and maintenance of existing footpaths and bridleways and the provision of suitable signage, footpath surfaces, notices and maps
    - ii. development of a way-marked trail system and the creation of additional public footpaths and walkways with, where appropriate, increased accessibility for the mobility impaired

- iii. preservation of existing areas of heathland, maritime grassland and woodland areas
  - iv. appropriate “rewilding” of the old par 3 golf course
  - v. preservation and protection of the archaeological heritage of the area, particularly Raheenacuilg.
- c) Plans for the enhancement of the area are integrated with town plans for Bray and Greystones and with plans for the development and enhancement of natural landscape and coastal amenities throughout the County.

### **Issues arising from the RSES**

5. It is noted that the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly identifies Bray as a Key Town ( a large economically active service and/ or county town that provides employment for its surrounding area and with high-quality transport links and the capacity to act as growth drivers to complement Dublin and Regional Growth Centres). It is further noted that the Regional Policy Objectives RPO 4.26 and 4.27 are premised on a significant proportion of future urban development being accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. BHRA considers that this future development, including meeting the requirement that 30% of all new homes be delivered within the existing built-up footprint of settlements, should be undertaken in a manner that protects and enhances the residential amenities of mature residential areas. RPO 4.37, supported by enhanced transport links envisaged in RPO 4.40, provides for the development of major schemes at the former Bray golf course<sup>1</sup> and Bray harbour and the westward extension of the town, and BHRA notes that this will provide for the consolidation of the development of the town whilst protecting the residential amenities of existing housing development and estates.
6. BHRA welcomes the emphasis on people based industrial activities as the primary local employment opportunity for Bray in RPO 4.38 (Support the development of Bray as a strategic employment location with a particular focus on attracting high value investment in ‘people’ based industries at accessible locations, in order to increase the number of local jobs).
7. BHRA welcomes the requirement of RPO 4.39 to promote the consolidation of the town centre with a focus on placemaking and the regeneration of strategic sites to provide for enhanced town centre functions and public realm, in order to increase Bray’s attractiveness as a place to live, work, visit and invest in. It is important that the deterioration of the commercial function of Bray town centre, and the erosion of the amenity functions of Bray seafront, are reversed in order to provide a vibrant focus for the people of the town. The damage to these functions has meant that the town has suffered from a diminution of a sense of place, and the economic activity of the population has become over-dependent on car transport (e.g. reliance on shopping areas and centres not easily accessible by public transport).
8. In regard to RPO 4.41 (Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and ‘walkable communities’

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<sup>1</sup> Woodbrook-Shanganagh referenced also in Table 5.1 of the MASP

9. whereby a range of facilities and services will be accessible within short walking or cycling distance), BHRA welcomes this, but is concerned to ensure that the provision of sustainable transport options, including cycleways, is undertaken in a manner that does not open up lands for development that would otherwise be unsuitable for development or conflict with overall sustainable development requirements. In particular, cycleways must be provided in a manner that cannot lead to the provision of vehicular access to lands not suitable or appropriate for development.

### **Transportation and Infrastructure**

10. BHRA welcomes the emphasis placed in the Transportation and Issues paper on the provision of sustainable transportation in the forthcoming County Development Plan. In existing residential areas, where there is inadequate provision of road space to pedestrians, a higher priority should be given to these, and to cyclists. Re-engineering of roads in these areas should be based on a design approach which creates self-enforcing low speed environments in housing estates and settlements.
11. The haphazard evolution of transport networks in existing developed areas, particularly mature residential areas, has created incentives for rat-running by car drivers that considerably damages residential amenities and significantly reduces road safety. This is frequently aggravated by new developments feeding into an existing deficient road network. BHRA requests that the Development Plan provide for a comprehensive traffic management review and plan for affected areas of the County, with specific provision for enhancing existing residential amenities and improved road safety in existing housing estates, as part of the overall objective of providing sustainable transport in Wicklow.

7th January 2020