



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	IMG Planning Limited on behalf of Sunbeam House Trust
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Bray MD LAP
Administrative Officer
Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
A67 FW96

18 December 2024

Dear Sir/Madam

**Preparation of Bray Municipal District Local Area Plan
Pre-Draft Consultation**

On behalf of Sunbeam House Trust, Bray, Co. Wicklow, we welcome the opportunity to make the following submissions and observations to the County Council for consideration in the preparation of the Bray Municipal District Local Area Plan.

The Sunbeam House Trust is a registered charity (Reg. No. CHY 1679) dedicated to supporting developments that enable people with disabilities to maintain full and meaningful lives in their communities and has had a presence in Bray for 150 years. The good work of the Trust continues today with the Trust funding of projects in the area of intellectual disabilities. Some sample projects the Trust has been involved with including:

- New Court School Bray: financial support to refurbish the computer room and library, as well as various redecoration projects.
- Lakers Social & Recreational Club Bray: financial support for the purchase of a replacement bus.
- Seapoint Dragons: financial support in the purchase of suitable sports clothing

To fund the many worthy causes that come before the Trust, it requires considerable financial resourcing and it must ensure that sufficient financial resources remain available to continue its good work for the coming years.

One of the Trust's properties is Vevay House on Vevay Road that has an important role to play in this and has the capacity to assist in the financial planning of the Trust. The site currently comprises Vevay House (also known as Sunbeam House), a building on the Record of Protected Structures (Reference B64); a single storey (extended) gate-lodge; Vevay Court: apartments for people with needs; Lucinda Lodge: sheltered housing, and workshop and meeting hall.

Key Topic: Housing – Population - Compact Growth – Supported Housing

The clear direction of travel of national policy in respect of housing supply is that significantly more housing has to be provided and provided substantially within existing settlements at sustainable densities. The government has approved revised housing targets for the period 2025 to 2030 aiming to deliver 303,000 new homes and these are reflected in the updated Draft Revised National Planning Framework, which once approved, will be incorporated into the Regional Spatial and Economic Strategies and Development Plans. Pending this, the Government has requested local authorities to undertake a preliminary assessment of the quantum of zoned and serviced land within their area that is available for residential purposes and to estimate the overall housing capacity of such lands. If it is considered there may be a need to increase the amount of zoned and serviced land the Government has stated that it would also be appropriate to start considering the most suitable location and to commence undertaking the supporting assessments required for the process of reviewing statutory development plans to give effect to updated housing targets.

Having regard to this, the preparation of the Local Area Plan should involve a review all land within the settlement boundary as to their suitability to facilitate residential use irrespective of whether the land is zoned for residential purposes or a mix of uses including residential in the current Local Area Plan. The review should have regard to the objective of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities to achieve compact growth by supporting more intensive use of existing buildings and properties, including the more intensive use of previously developed land and infill sites.

Key Topic: Heritage - Biodiversity - Green Infrastructure - Climate Action – Energy

The Local Area Plan should include policies and objectives to facilitate 'enabling development' to be carried out in conjunction with works to protected structures.

Enabling development is development that would be unacceptable in planning terms (e.g. inconsistent with zoning objectives for an area) other than for the fact that it would bring significant public benefits in the form of securing the long-term future of a protected structure. Enabling development can secure the restoration of a protected structure and its use for purposes compatible with its character where the public benefit associated with securing its future decisively outweighs the drawbacks of not complying with other planning objectives.

The Local Area Plan contains a number of Tree Preservation Orders including one, BR5, which applies to the Trust's property at Vevay House. Some of these Orders have been in place for more than twenty years and with the passage of time, the extent of the trees that supported the making of the Order will have changed with trees having died or having to be felled due to becoming dangerous. There should not be a presumption that the existing Orders 'roll over' into the forthcoming Local Area Plan; a full review of

all Orders should be undertaken to ensure that they continue to be justified or to provide the basis for amendment to reflect the current situation.

Yours faithfully



Ian McGrandles
Director