



Pre Draft Bray LAP Submission - Report

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Compact Growth - Housing – Population Growth

Submission

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File

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PRE-DRAFT STAGE BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2025-2031

Submission Ballymore Group

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18 DECEMBER 2024

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EXECUTIVE SUMMARY

This submission to the preparation of the draft *Bray Municipal District Local Area Plan 2025-2031* by Ballymore Group relates to the remaining undeveloped portion of the former Bray Golf Club lands immediately north of the River Dargle and now known as Sea Gardens. The applicant for consent on these lands is Shankill Property Investments Ltd which is a Ballymore company.

The redevelopment of the former Bray Golf Course lands is identified as strategic at the national, regional, and local planning policy levels to deliver on the compact and sequential growth of Bray. Under the *Bray Municipal District Local Area Plan 2018-2024*, these lands are zoned Mixed Use (MU) and are subject to Specific Local Objective 3 (SLO 3). Part of the overall lands has been completed and includes the Ravenswell primary and post primary schools campus (Wicklow County Council Planning Ref No.15/190) and a Strategic Housing Development (An Bord Pleanála (ABP) Case Ref.ABP-311181-21).

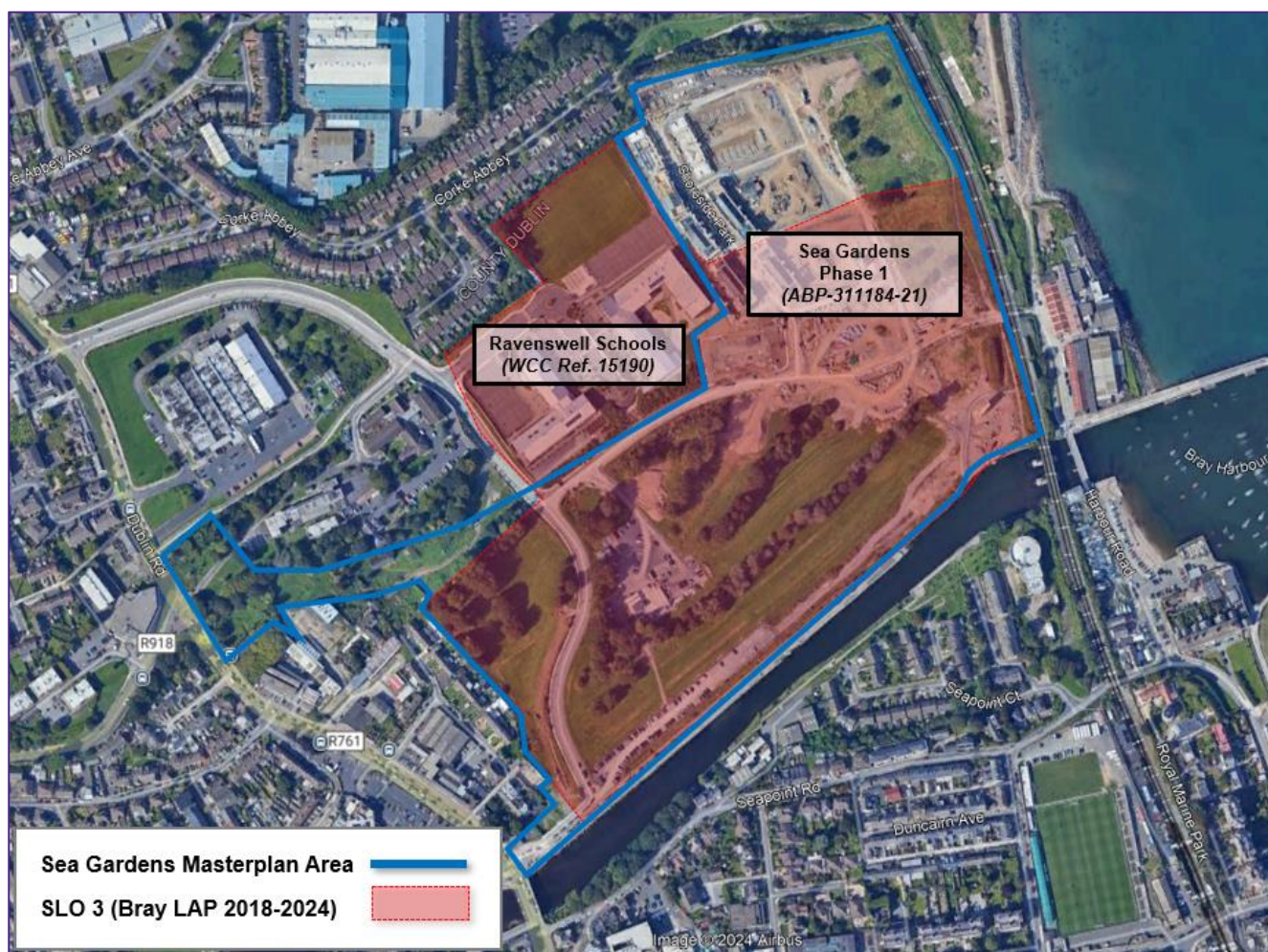


Figure 0-1: Former Bray Golf Course Lands

(Source: Based on Bing Maps)

This submission advocates for the delivery of the remaining undeveloped lands as a compact urban neighbourhood that complements and reinforces the primary function of Bray Town Centre as the retail, commercial and administrative hub of County Wicklow but does not compete with the town centre or displace an existing, somewhat fragile retail core.

Following the adoption of the Bray MD LAP 2018-2024 considerable progress has been made in advancing the development of this longstanding vacant brownfield site adjacent to the centre of Bray and the delivery of a sustainable new residential and mixed use district. Informed by the LAP's SLO 3, a masterplan, the Sea

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Gardens Masterplan (formerly Harbour Point Masterplan), was prepared to establish a coherent vision for the lands. The masterplan seeks to facilitate compact and sequential growth for Bray while aligning with evolving market demands. To date, c. 300 no. residential units and c.1,585 sq.m of commercial uses have received planning permission. Additional planning applications to deliver c. 700 no. residential units, a c. 2.0 hectare public park and other parklands, together with local level retail and commercial spaces are scheduled for submission during 2025. The combined masterplan is illustrated in **Appendix A** to this submission.

While the vision under SLO 3 provided a framework for the orderly development of the lands to contain a mix of land uses, Ballymore has found that the rigid imposition of minimum retail and office floorspace requirements has inhibited the optimal development of the lands. The required minimum floor areas, and in particular the requirement for 20,000 sq.m of retail space, are reminiscent of Celtic Tiger era capacity assessments that are not relevant to today's economy. No retail development of such a scale has been developed in Ireland in the last 20 years, with many existing shopping centres seeking to downsize and diversify away from retail. Similar trends have been experienced within the core retail areas of our town centres with many retail operators ceasing to trade.

Current planning policy (**Section 3**) emphasises compact and sequential growth, guided by a town-centre-first and placemaking approach. The draft Revised NPF puts a new emphasis on Performance Based Design Standards, stating; *"To enable brownfield and infill development, planning policies and standards need to be flexible, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases"*. While Ballymore is committed to the delivery of c. 1,000 residential units and a 2.0 hectare park on the subject lands, we respectfully request that the other minimum area requirements are removed from the new LAP and replaced with objectives which focus on delivering high-quality, sustainable mixed-use development that reinforce Bray's town centre role and function rather than promoting edge of centre retail and commercial development that would serve to weaken the core retail area.

A review of the *Bray Town Centre Health Check 2019* (see **Section 4**) concludes that Bray's town centre continues to face persistent challenges, including high vacancy rates, limited retail diversity and slow uptake of newly developed retail spaces such as Bray Central. Most of the Opportunity Sites identified in the Bray MD LAP 2018-2024 remain undeveloped despite their proximity to Bray's Main Street. These findings call into question the appropriateness of applying minimum floorspace requirements for further retail floor space, particularly of large-scale 'big box' format outside of the core retail area. We suggest the guiding principle should focus on how the development of the subject lands can complement and support sustaining the primacy of Bray's town centre. We believe that this can best be done by promoting the development of a large residential community within walking distance of the town centre.

Section 5 of this submission analyses the changes in the retail and office sectors since 2018, driven by consumer behaviour changes, e-commerce, and evolving work patterns. These changes are reshaping the role of town centres, prioritising mixed-use community-focused developments. Convenience or comparison retail is no longer the dominant use in our town centres and evidence shows that existing large-scale retail developments are increasingly integrating leisure, entertainment and residential uses to address vacancy and occupancy challenges.

In summary, it is submitted that robust evidence exists to support local objectives which incorporate the following guiding principles specific to the remainder of the former Bray Golf Course lands yet to be redeveloped:

- **Reflect Current Policy Context:** Acknowledge the strategic significance of the remainder of the former Bray Golf Course lands yet to be delivered at Sea Gardens in facilitating compact and sequential growth in Bray. Future development proposals should be evaluated based on their ability to contribute to high-quality, sustainable, mixed-use, mixed residential tenure communities. Emphasis should shift from rigid quantitative standards to qualitative criteria that prioritise high-quality design and integration with Bray's town centre.
- **Focus on Sustainable, Mixed-Use Development and Mixed Tenure Development:** Promote proposals that incorporate a diverse mix of uses, including residential, parks and recreation, leisure, commercial, cultural, and community services. Proposals should be assessed on merit, i.e., ensuring they deliver high-

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quality, sustainable mixed-use developments which will complement existing amenities and uses established in the area.

- **Focus on Sustainable Retail and Other Commercial Uses & Providing Flexibility:** In light of evolving retail and office trends, facilitate commercial developments that meet the needs of residents in the immediate area. Rigid quantitative floor space requirements should be eliminated, ensuring retail and office based proposals do not undermine or compromise delivery of opportunity sites within the core retail area of Bray's town centre.
- **Redefine Extent of SLO Designations:** Recognise the progress made on the lands, specifically excluding areas already developed with the focus remaining on undeveloped lands.

1 INTRODUCTION

On behalf of our client, Ballymore Group, we welcome the opportunity to make a submission on the pre-draft stage of the *Bray Municipal District Local Area Plan 2025-2031*.

This forthcoming Bray MD LAP 2025-2031 represents a unique opportunity to shape the future sustainable growth of Bray, particularly the strategic lands at the former Bray Golf Course. These lands have been recognised as strategic in national and regional planning policy due to their potential to contribute to Bray's future compact and sequential growth.

Ballymore has been advancing the development of the former Bray Golf Course lands since acquiring them in 2020. This includes the preparation and implementation of the *Sea Gardens Masterplan* (formerly Harbour Point), which aims to deliver a new mixed-use neighbourhood directly adjacent to the centre of Bray, with a range of residential typologies, complementary retail and commercial uses alongside extensive parklands, community and social facilities and the physical infrastructure necessary to support the needs of future residents and existing communities. These developments are in addition to the Ravenswell school campus completed by others in 2020.

To date, c. 300 no residential units and c.1,585 sq.m of commercial space have received planning permission within the Wicklow County administrative area and are currently under construction. Additional planning applications to deliver c. 700 no. residential units, a 2 hectare public park and other parkland, retail and commercial spaces are scheduled for submission to the Wicklow County Council in 2025. The combined masterplan is illustrated in **Appendix A** to this submission.

Ballymore is committed to collaborating with the Wicklow County Council and the local community, focusing on supporting the sustainable and sequential growth of Bray and safeguarding Bray's town centre vitality.

This submission recommends that the zoning, and any Specific Local Objectives (SLO) included in the forthcoming Bray MD LAP 2025-2031 relating to the subject lands reflects current national planning policy, recent completed and proposed development on the subject lands and the changed commercial property environment since the Bray MD LAP 2018-2024 was adopted. Specifically, we suggest:

- Any SLO is consistent with current national policy objectives promoting compact growth, performance based design standards, sequential development and the Town Centre First approach.
- Objectives are mindful of local, national and international trends in retail and commercial development. Future developments on the subject lands must not undermine the core retail area of Bray in terms of its health and retail function but should instead support and strengthen the town centre's role.
- Objectives provide for the delivery of a sustainable urban neighbourhood with range of residential typologies and tenures, with a focus on quality design and placemaking to form a sustainable urban district adjacent and complementary to Bray Town Centre.

1.1 Submission Structure

This submission is structured as follows:

- **Section 1** is this Introduction.
- **Section 2** provides an overview of progress delivering a sustainable development on the subject lands.
- **Section 3** identifies relevant national, regional, and local planning policy that support compact and sequential growth of Bray, focus on town-centre-first developments, and the importance of protecting and strengthening town centres.
- **Section 4** updates the Health Check originally carried out in 2019. This section presents population trends, current retail mix and range of offerings, vacancy levels and their impact on the vitality of Bray's town centre and Opportunity Sites.

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- **Section 5** is an overview of current trends in commercial development. This section discusses current trends in the retail and office markets, business challenges, and the shifting role of town centres. It also reviews recent retail developments and planning applications relevant to the context of this submission.
- **Section 6** : This section summarises key findings from previous sections, highlighting the need to ensure any SLO can guide the sustainable development of the subject lands in line with evolving policies, market conditions, and the protection of Bray's town centre.

2 SEA GARDENS

2.1 Former Bray Golf Course Lands

The former Bray Golf Course comprised c. 19.35 hectares primarily bounded to the east by the Dublin to Rosslare railway line, to the north by the Woodbrook Glen, to the west by Corke Abbey residential estate, and to the south by the River Dargle. While primarily within Wicklow County Council's administrative area (15.7 hectares), a portion of the old golf course extended into Dún Laoghaire-Rathdown County Council's administrative area (3.65 hectares).

Figure 2-1 illustrates the extent of the lands and their proximity to Bray's town centre and Main Street.

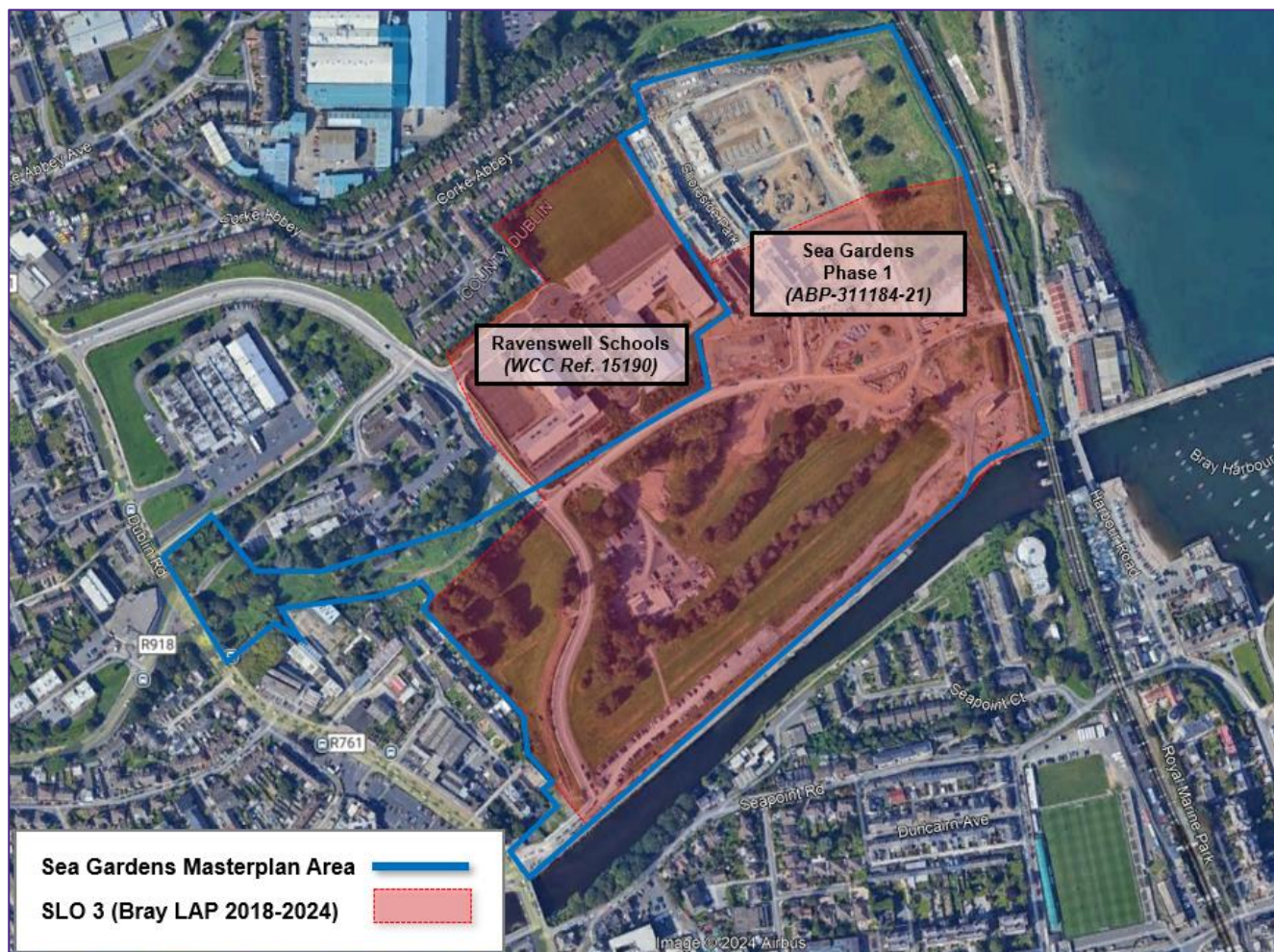


Figure 2-1: Former Bray Golf Course Lands

(Source: Based on Bing Maps)

A number of planning applications for redevelopment on the former Bray Golf Course lands were permitted in 2010 (e.g., Wicklow Co. Co. Ref. 07/630194, Dun Laoghaire-Rathdown Co. Co. Ref. D07A/1495, and ABP Ref. PL39.230246). These permissions were aligned with the vision set in the *Wicklow Draft Retail Strategy 2003*, *Wicklow County Development Plan 2004-2010* and the *Bray Municipal District Local Area Plan 2005-2011* and, thus, included significant retail provision. However, these developments were never delivered, reflecting shifts in retail market dynamics and consumer behaviours, as discussed in **Sections 4 and 5**. Notwithstanding these shifts, for over two development plan cycles the retail policy and retail floorspace minimum requirements as set out in the Bray LAP 2018-2024 for SLO 3 have remained unchanged. We suggest that they are now out of date.

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The Ravenswell schools campus, consisting of Colaiste Raithin and St. Philomena's Primary School, was consented in 2015 and opened in 2020. This campus, on 4 hectares, is a state-of-the-art campus providing a range of sports and recreational facilities for the schools' population and wider local community.

2.2 Sea Gardens Masterplan

More recently, following the acquisition of the lands by Ballymore Group, progress has been made in delivering a sustainable development framework. Informed by the existing SLO 3 as set out in the Bray MD LAP 2018-2024, a masterplan, *Sea Gardens Masterplan* (formerly Harbour Point), was prepared to establish a coherent vision for the lands. The masterplan prioritises mixed-use development, led by a residential component, which is supported by extensive community and social facilities, parklands, physical infrastructure, and complementary retail and commercial uses. The masterplan seeks to facilitate compact and sequential growth for Bray while aligning with evolving market demands.

2.3 Progress

Ballymore Group has made significant progress in the implementation of the masterplan which includes:

- **Phase 1a (Ref. ABP-311181-21):** Nearing completion, this phase includes 122 residential units and 1,071 sq.m of retail and commercial spaces, as well as a childcare facility, open spaces, recreational amenities, and infrastructure to integrate with the surrounding area.
- **Phase 1b (Ref. ABP-314686-22):** Recently permitted, it adds 175 residential units and 107 sq.m of retail space, alongside further amenities and infrastructure.
- **Phase 2 (Application being prepared):** Proposes c. 340 residential units and c.18,300 sq.m of mixed-use development, including childcare facilities, a medical centre, a hotel and other retail/commercial spaces and a 2.0 hectare park. The hotel will provide much needed leisure facilities, food and beverage and function rooms to serve the wider Bray community as well as guest accommodation. The application is expected to be submitted to Wicklow County Council in early 2025.
- **Phase 3 –(Application being prepared):** The application is expected to be submitted to Wicklow County Council in 2025, with plans for approximately 350 residential units and some additional retail/commercial floorspace.

Ballymore Group is committed to delivering a sustainable and coherent mixed-use, residentially led neighbourhood, supporting Bray's compact and sequential growth and underpinning Bray town centre's vitality. The approximate extents of Phases 1, 2 and 3 are illustrated on **Figure 2-2** below. The combined masterplan is illustrated in **Appendix A** to this submission together with some recent images of progress.



Figure 2-2: Sea Gardens Masterplan

Source: Howells Architects

2.4 Specific Local Objective 3 (SLO 3)

The vision and guiding principles for development proposals within the subject lands have been mainly guided by SLO 3 (see **Section 3** and **Figure 3-1**) of the Bray MD LAP 2018-2024.

Phase 1 of Sea Gardens is now permitted and under construction. Other lands within SLO 3 including the schools campuses have also been developed and are operational. It is timely therefore to consider revising the geographic extent of SLO 3 and associated zonings given those area that have been delivered relative to those lands adjacent to the town centre that have yet to be completed. As noted, SLO 3 has provided a framework for the ordered development of the former Golf Club lands, however in its current form this objective does not reflect changes in planning policy, the retail and commercial development landscape, or the health of Bray's town centre.

It is acknowledged that a mix of uses should be accommodated on the site and Ballymore Group is absolutely committed to developing a high-quality mixed-use scheme, however unwavering quantitative floorspace requirements for retail and commercial floor space on the site set out under the current SLO 3 risk hindering the development of the remaining lands. Any revised SLO must provide a framework that enables proposals to be agile, allowing development to adapt to rapidly evolving market trends. We suggest the emphasis should be on focusing on delivering high-quality, vibrant spaces that complement Bray's town centre and respond to local needs while also enabling proposals to be assessed by the competent authority on their merit.

As outlined in **Section 3** of this submission, national and regional policy priorities emphasise compact growth, town-centre-first development, performance-based design standards and placemaking. **Section 4** of this submission identifies weaknesses in Bray's town centre/core retail area, including vacancy rates, limited retail diversity, slow uptake of new retail space and lack of developer interest in the development of identified Opportunity Sites. While **Section 5** of this submission outlines the significant evolution of retail and office markets, with mixed-use developments increasingly replacing traditional retail shopping centres.

3 POLICY CONTEXT

3.1 Introduction

This section presents a review of the policy context relevant to Bray, future developments in the former Bray Golf Course lands and the remainder of development to take place as part of the Sea Gardens Masterplan.

In preparing the new Bray MD LAP 2025-2031, it is vital to ensure that any replacement of SLO 3's guiding principles, development management standards and corresponding zoning align with the overarching policies and objectives at national and regional policy levels, as identified in this section. In practical terms, this will support a development that will deliver compact and sequential growth for Bray, strengthen its town centre, and facilitate the creation of a quality and liveable community.

3.2 National Planning Policy

3.2.1 National Planning Framework 2018 & Draft Revised NPF 2024

The **National Planning Framework** (NPF) serves as Ireland's high-level strategic plan for guiding national, regional, and local planning policy. It identifies key challenges facing Irish towns and cities, including:

“A gradual process of run-down of city and town centre and established suburban areas as jobs, retail and housing move out, leaving behind declining school enrolments, empty buildings and a lack of sufficient people to create strong and vibrant places, both day and night;”

The NPF promotes compact and sequential growth of towns (NPO 3), thereby reducing pressure on infrastructure and minimising environmental impact. To achieve this, the NPF advocates densification (NPO 35), reusing brownfield land, and redeveloping infill sites (NPO 6). It emphasises urban and village regeneration to create vibrant and liveable places, with a focus on quality and design (NPOs 4, 6, 18a, 18b, and 35).

The Draft NPF continues to prioritise compact and sequential growth and densification under NSO 1 and NPO 3, aiming for 40% of future housing to be located within the existing footprint and built-up areas of towns. It also promotes higher densities, with a new emphasis on Transport Oriented Development.

The amendments proposed during the consultation process and adopted in the updated version include a new target of an average of 50,500 homes per year, increasing to 60,000 homes by 2030, with this level maintained thereafter. This revised target aims to achieve a total of new 303,000 homes by 2030.

3.2.2 Town Centre First Policy 2022

The **Town Centre First Policy** (TCF), introduced in 2022 by the Department of Housing, Local Government and Heritage, seeks to tackle vacancy, combat dereliction, and revitalise town centres.

It highlights challenges such as the impact of out-of-town and online shopping on retail, service closures, and a general decline in town centre living and commercial activity.

“(...) the impact of out-of-town and online shopping on town centre retail, and the closure of services where providers have found it is no longer viable to maintain such services. In many places there has been a general drift away from town centre living and town centre commercial activity, which has had a “hollowing out” effect on some of our towns.”

The challenge identifies opportunities to provide housing by reusing plots, converting vacant retail units, and developing derelict sites. The TCF is an important policy which moves beyond simple cognisance of the need to mitigate against the negative impacts on town centres of out-of-town development to a fundamental recognition of the need to pro-actively sustain and support existing town centres.

3.2.3 Retail Planning Guidelines 2012

The **Retail Planning Guidelines** (RPG) aim to ensure planning supports competitiveness and choice in the retail sector while promoting town centre vitality. The RPG emphasise retailing as a key driver of urban vibrancy, advocating for:

- Plan-led retail development.
- A sequential approach to promote town centre vitality.
- Competitiveness through enabling good quality development proposals.
- Access to retailing by sustainable transport modes.
- High-quality urban design outcomes.

The RPG warn against large-scale out-of-centre developments, which risk undermining town centre vitality. Retail proposals with significant trade diversion potential must undergo retail impact assessments to address and mitigate adverse effects.

The **Retail Design Manual 2012** accompanied the RPG. It highlights the role of high-quality design in sustainable urban development. It identifies key principles for retail architecture and urban design to enhance urban vibrancy, reduce car dependency, and stimulate economic activity.

3.3 Regional Policy

3.3.1 The Regional Spatial & Economic Strategy 2019-2031

The **Regional Spatial and Economic Strategy 2019-2031** (RSES) for the Eastern and Midland Regional Assembly (EMRA) supports the implementation of the NPF, providing a long-term strategic planning and economic framework for the region's development.

The RSES identifies Bray as a 'Key Town' in the Dublin Metropolitan Area (DMA) and is included in Dublin's Metropolitan Area Strategic Plan (MASP). Bray is described as the largest town in County Wicklow, with a population of 32,600 in 2016, benefitting from access to the N/M11 corridor, DART/rail line, and bus services.

Table 4.2 of the RSES designates Bray as a 'Key Town' in the Settlement Hierarchy for the Region. Key Towns are defined as:

"Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres."

Regional Policy Objectives (RPOs) 4.37, 4.39 and 4.41 are of relevance to Bray and the former Bray Golf Course lands. The objectives seek the consolidation of the Bray and town centre, enhancement of the town centre with a focus on placemaking, and focus on regeneration of strategic sites, including the development of the former Bray Golf Course lands for major mixed-use schemes. Specifically;

- **RPO 4.37:** *Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.*
- **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.*

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- **RPO 4.41:** *Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance.”*

The RSES identifies that there is significant potential for new development in the established town centre and built up area, particularly since the completion of the River Dargle Flood Defence Scheme. The former Bray Golf course and Harbour Lands are designated for high density new mixed-use development with improved town centre functions, which will be significantly enhanced through the construction of the Florentine Centre, now Bray Central, on the Main Street along with the development of the seafront. The RSES also states that Bray is well located for tourist access to the Wicklow mountains and with local attractions. It highlights that the delivery of new mixed-use development of Bray Golf course and Harbour Lands will provide for consolidation within the established town. Under Table 5.1, the former Bray Golf Course is identified as a strategic development area for the ‘development of new residential communities’.

Table 6.1 of the RSES designates Bray as a ‘Town And/Or District Centres & Sub-County Town Centres (Key Service Centres)’ in the Retail Hierarchy for the Region. The RSES notes that the floorspace thresholds included in the 2008 Retail Strategy for Greater Dublin Area (GDA) were developed during a different economic climate. In this regard the RSES includes the following retail-specific objectives:

- **“RPO 6.10:** *EMRA will support the preparation of a Retail Strategy / Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region.*
- **RPO 6.11:** *Future provisions of significant retail development within the Region shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated.”*

The RSES does not apply any floorspace requirements to the Region. It does however provide policy support for the primacy of town centres and a focus on placemaking including the following objectives.

- **“RPO 6.12:** *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*
- **RPO 6.14:** *EMRA will support the use of targeted financial incentives to re-establish the dominant role of town centres provided for in planning policy to encourage a greater take up of town centre development opportunities for retail, residential, commercial, and leisure uses.”*

3.4 Local Planning Policy

3.4.1 Wicklow County Development Plan 2022-2028

The **Wicklow County Development Plan 2022-2028** (Wicklow CDP) sets the local planning framework for the County for the next six years. It outlines a vision for sustainable growth in line with national and regional policies and objectives, with an emphasis on the practical delivery of compact and sequential growth, placemaking, and climate resilience.

The Wicklow CDP forecasts significant population growth in Wicklow, targeting 170,000–173,500 residents by 2031, with a minimum increase of 9,500 persons in Bray.

The Wicklow CDP sets as one of its strategic outcomes the delivery of resilient town and village centres through regeneration and renewal, noting “(...) *It is essential that we protect and maintain the viability of town and village centres, target the reversal of decline and deliver sustainable reuse and regeneration outcomes.*”

The Wicklow CDP designates Bray as a ‘Key Town’ in its settlement and economic hierarchies, aligning with its role as a major driver of “foreign direct investment” and “knowledge-based industries”, and consistent with the RSES. However, further expansion is limited by geographical constraints.

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The former Bray Golf Course lands are earmarked for *“high-density, mixed-use development”* to support compact growth and town regeneration, consistent with its designation as a strategic area under the RSES.

Specific policy objectives supporting this vision include:

- **CPO 12.64.** This advocates for the land’s development to deliver compact growth, promote sustainable mobility, and enhance employment opportunities.
- **CPO 5.6.** This notes that strategic sites are *“to deliver compact growth, prioritising sustainable mobility, expand employment opportunities and strengthen the viability and vibrancy of the town centre.”*

3.4.1.1 Retail Strategy

Wicklow CDP’s Retail Strategy recognises the impact of the COVID-19 pandemic on shopping patterns, stating that it *“makes it difficult to determine with accuracy what the County’s retail requirements will be”*. Other difficulties are also recognised: *“The challenge remains for planning authorities to protect the retail core of our town centres while simultaneously allowing development that will ensure the continued vitality and vibrancy of town and village centres.”*

As per the RSES, Bray is identified as a ‘Major Town Centre & County Town Centre’ (Level 2), which should provide a high-level retail function serving a wide catchment within Wicklow CDP. The Wicklow CDP envisages that Bray will provide a full range of all types of retail, from newsagents to specialist shops and boutiques, large department stores, food stores of all types, shopping centres and high levels of mixed uses, including the arts and culture to create a vibrant living place. The town will be a focus for medium and higher quality comparison goods.

Map No. 10.01a of the Wicklow CDP illustrates Bray’s ‘Core Retail Area’. This encompasses Main Street, nearby sections of adjacent streets (e.g., Florence Road, Quinsborough Road), and parts of Castle Street. The former Bray Golf Course lands, located 300–400 m from the core retail area, are excluded from this designation.

Key objectives guiding retail development include:

- *“To promote and encourage the major enhancement of retail floorspace, primarily comparison goods and town centre functions in Bray and Wicklow Town, to sustain their competitiveness and importance as Key Towns / Major Town Centres;*
- *To strengthen the retail core areas by addressing vacancy and capitalising on the opportunities and presented by derelict sites and underutilised sites;*
- *To promote the expansion of retail floorspace first and foremost within the core retail areas / existing town and village centre areas and thereafter in accordance with the sequential approach to retail development;*
- *To ensure that town and village centres are attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and are competitive places to conduct business; and*
- *To promote a high quality of design in all centres.”*

Following on from the above objectives, the following priorities are set out in the Retail Strategy:

- *“ (...) promote and encourage the major enhancement of retail floorspace, primarily comparison goods and town centre functions in Bray to sustain its competitiveness and importance as a Major Town Centre;*
- *facilitate the significant expansion in the amount and range of comparison floorspace, particularly floorspace for middle and higher order comparison goods;*
- *facilitate the delivery of a large scale retail development within the core retail area on the ‘Bray Town Centre’ (formerly known as ‘Florentine’) development site;*
- *facilitate the delivery of a large-scale retail development on the former Golf Club lands;”*

There is a suite of objectives regarding retail development within the Wicklow CDP. A summary is provided as follows:

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- **CPO 10.1.** This seeks the promotion of vibrant, attractive town centres as focal points for retail, leisure, cultural, and residential activities.
- **CPO 10.3.** It encourages retail development aligned with the county's retail hierarchy and national retail planning guidelines.
- **CPO 10.4.** Directs retail developments to zoned lands within settlements, prioritising sustainability.
- **CPO 10.8.** Enforces the sequential development approach to safeguard town centre vitality, discouraging peripheral developments unless justified.

CPO 10.9. Prioritises the core retail area for new developments, requiring street-level retail/commercial uses in key zones to reinforce the town centre's function. In this regard, it is noted that *“the ‘core retail area’ shall be promoted as the area of first priority for new retail development”*.

With respect to the objective *‘facilitate the delivery of a large-scale retail development on the former Golf Club lands’*, it is respectfully submitted that the RSES advocated for the delivery of new mixed-use development of Bray Golf course and Harbour Lands to provide for consolidation within the established town, which did not necessarily translate into the delivery of a large scale retail development. In any proposed Variation to the Wicklow CDP as part of the making of the new Bray MD LAP, policy objectives seeking this requirement should be removed from the CDP in the interests of protecting an already weakened and fragile core retail area of Bray town centre.

3.4.1.2 Housing

The Wicklow CDP acknowledges that the delivery of well-designed homes in the right locations are fundamental to building strong, sustainable communities. It is respectfully submitted that such communities should be in a position to provide for a mix of tenures in order to be truly sustainable. This includes provision for the rental sector. The drafting of CPO 6.2 contained within the Wicklow CDP predates Section 28 Ministerial Guidelines on *Regulation on Commercial Institutional Investment in Housing* and therefore the blanket ban on the sale of all developments of residential units, whether houses, duplexes or apartments, to commercial institutional investment bodies prevents a mixed tenures to be accommodated.

While limits to such development may be appropriate elsewhere in County Wicklow, given the largely rural nature of the county, the subject lands within Bray are functionally part of the Greater Dublin Area. Therefore, we suggest that as part of a future Variation process that the Wicklow CDP be amended to lift this ban on that part of the county north of the Dargle River.

The bulk of new residential development on the subject lands will be own door family housing. A significant portion will be social and affordable housing. However, we believe that there is also a role for purpose built rental accommodation in any thriving town of scale. A healthy community has the widest possible range of residential tenures.

3.4.2 Bray Municipal District Local Area Plan 2018-2024

The **Bray Municipal District Local Area Plan 2018-2024** (the existing Bray LAP) sets a vision for Bray:

“The town has the potential to be the most sustainable town in the County – a town which can most easily achieve the vision of ‘walkable’ communities whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance. In addition, all residents in the town have access to a good quality public transport system with local buses and DART services, thereby reducing the dependence of residents on private car use.”

3.4.2.1 Former Bray Golf Course lands & Specific Local Objective 3

As per the current Bray LAP, the lands are subject to SLO 3 of the existing Bray LAP. The location of the subject land is outlined on **Figure 3-1** below.

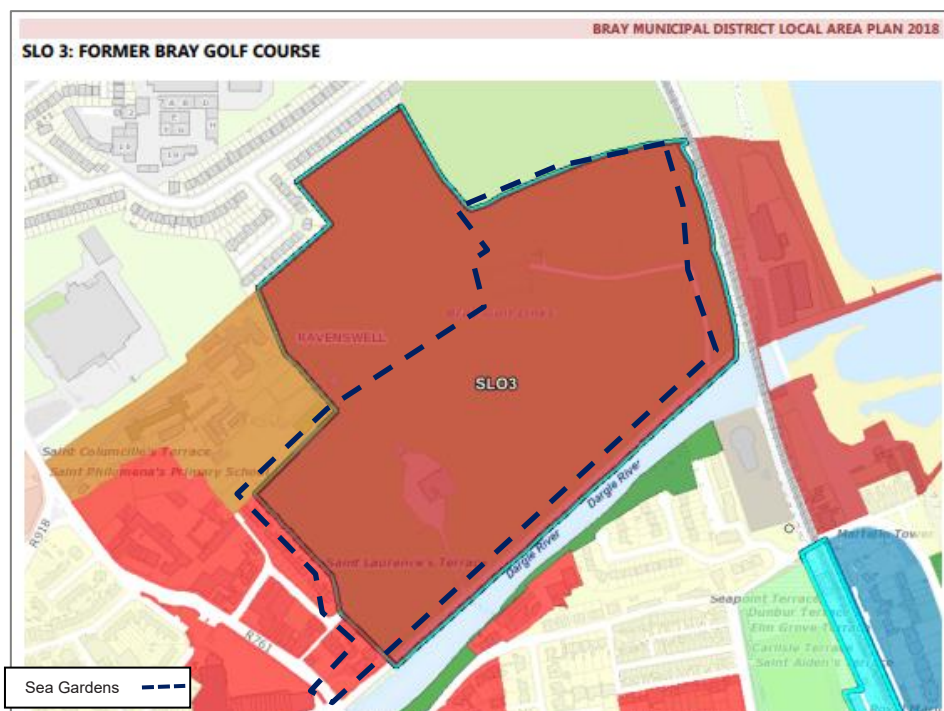


Figure 3-1: SLO 3 Lands & Sea Gardens

(Source: Based on Bray LAP 2018-2024)

SLO 3 contains a series of development guiding principles and development management standards, as follows:

- *“The lands shall be developed as an extension to the existing town centre and shall involve the creation of a number of new streets and squares, where pedestrians and non-motorised forms of transport have priority, where buildings front directly onto streets and squares with active, attractive ground floor frontage;*
- *The design, finishes etc of all buildings shall draw reference and inspiration from the existing traditional town centre and the development shall flow from ‘old’ to ‘new’ without jarring distortions of scale, format or design;*
- *Excellent linkages shall be provided from the site to surrounding areas; multiple access points for both vehicles and cyclists / pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray seafront / the DART station and public walking route along the river;*
- *Car parking shall generally to located under or within buildings; not more than 20% of the total overall parking provision required for the entire MU area may be located on open surface locations;*
- *The residential element shall generally be delivered in a high-density format with the target provision of 1,000 units in a variety of unit sizes and formats;*
- *Retail development shall be integrated into the development in a manner that flows from the existing retail core of the town and brings vitality and vibrancy to the streets and squares of the new development. Retail floor space (including retail services such as restaurants, hairdressers etc) of not less than 20,000sq.m (of which a minimum of 10,000sq.m shall be comparison floorspace) will be required;*
- *Non retail commercial floor space, such as offices, professionals services etc of not less than 5,000sq.m shall be integrated into the development at both ground and above retail levels;*
- *The existing schools / sports zone shall be retained; excellent access shall be retained to the schools and associated sports facilities and such access shall avoid the need to bring traffic through new residential areas or town shopping streets;*
- *Not less than 2ha shall be developed as public open space;*

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- *Any application shall include a detailed phasing programme that ensures the timely delivery of all elements of the SLO. In order to ‘kick start’ the development, a first phase of housing, being those units that are not integrated into the mixed use retail / commercial element, in conjunction with the public park, may be developed as a ‘Phase 1’ of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the retail / commercial element.”*

Lands subject to SLO 3 are zoned with land use zoning objective MU – Mixed Use with the objective that “these lands be developed as a mixed commercial, residential, education / community facilities and open space zone.”

In the new Bray MD LAP 2025-2031 progress made on the lands should be recognised and the focus of any new SLO 3 placed on the remaining undeveloped lands expedite development.

As advocated by the draft Revised NPF in order to enable brownfield and infill development, planning policies and standards need to be flexible, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases. While Ballymore is committed to the delivery of c. 1,000 residential units and a 2.0 hectare park, we respectfully request that the other minimum area requirements are removed from the new LAP and replaced with objectives which focus on delivering high-quality, sustainable mixed-use development that reinforce Bray’s town centre role and function rather than promoting edge of centre retail and commercial development that would serve to weaken the core retail area.

Ballymore has found that the rigid imposition of minimum retail and office floorspace requirements has inhibited the optimal development of the lands. The required minimum floor areas, and in particular the requirement for 20,000 sq.m of retail space, are reminiscent of Celtic Tiger era capacity assessments that are not relevant to today’s economy. No retail development of such a scale has been developed in Ireland in the last 20 years, with many existing shopping centres seeking to downsize and diversify away from retail. Indeed, the requirement that no more than 20% of car parking spaces be at ‘open, surface locations’ reflects the expectation at the time of drafting that the development of the subject lands would be primarily as a shopping centre. This requirement is not appropriate for the residential led development, with a high proportion of traditional own door housing now proposed and should be reviewed in the present context.

3.4.2.2 Retail Development

Key objectives set in the Bray MD LAP 2018-2024 guiding retail development in Bray are as follows:

- **“TC1:** *To ensure the continued vibrancy and life of centres, to direct new development and investment into settlement centres (i.e. the ‘town centres’ and ‘primary development areas’) in the first instance and to particularly prioritise actions that enhance business, retail, leisure, entertainment and cultural uses, as well as making town centres an attractive place to live.*
- **TC2:** *To vigorously protect and promote the vitality and viability of town centres. Development proposals not according with the fundamental objective to support the vitality and viability of town centre sites must demonstrate compliance with the ‘sequential approach’ before they can be approved. The ‘sequential approach’ shall be applied and assessed in accordance with the ‘Retail Planning Guidelines, (DoECLG, 2012)’. The Planning Authority will discourage new retail development if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the District. In the application of the ‘sequential approach’ due regard shall be paid to RT3 below which prioritises the ‘core retail area’ for new retail development.*
- **TC5:** *To promote the revitalisation of vacant / derelict properties / shop units. Where no viable retail use can be sustained, alternative uses will be assessed on their own merits against the requirements of the proper planning and sustainable development of the areas within which they are located. This objective will be used to ensure that all proposals for the reuse of existing retail floorspace can be evaluated against the proportion of overall vacancy and to reduce the possibility of dereliction.*
- **RT3:** *To promote developments which reinforce the role and function of the ‘core retail area’ as the prime shopping area of town centres. The ‘core retail area’ shall be promoted as the area of first priority for new retail development. In settlements where no ‘core retail area’ is defined, regard shall be paid to the designated ‘town centre’ area, the location of the traditional/historical centre and the location of other retail*

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units. Where an application is made for a new development with street frontage either in the defined retail core of a larger settlement or on the 'main street' of a smaller town, retail or commercial use will normally be required at street level.

- **BT1:** To promote Bray town centre as the primary retailing and commercial sector location in the town. Retailing will be promoted as the core function of the town centre. Bray Town Centre consists of the area of land which is zoned 'TC: Town Centre Uses', which extends in a north/south direction from the Dublin Road to Market Square, and in an easterly direction, encompassing Quinsborough Road, Florence Road, Bray Dart Station and part of Novara Avenue. It is the area of the town that provides a broad range of facilities and services and which fulfils a function as a focus for both the population of Bray and public transport.
- **BT2:** To promote and support the development of significant new retail, retail services, commercial and cultural / community floorspace in Bray, at the following locations: - the 'Florentine Centre' (see Objectives for 'Opportunity Site 1' to follow) - Former Bray golf club lands (see Objectives for SLO 3)"

3.5 Summary of Key Findings

The practical delivery of compact and sequential growth is at the forefront of the policy context, emphasising the importance of development within built-up areas. This includes infill development and the creation of quality, mixed-use, and sustainable spaces that facilitate sustainable mobility for residents.

A critical objective across all policy levels is to safeguard the primacy of the town centre, its main streets, and its built heritage, structure, and character. However, the challenge remains in balancing this objective with the need to accommodate contemporary floorplate demands. Concurrently, there is a growing policy recognition of the necessity to promote towns, mainly traditional town centres, as vibrant places for people to live.

Retail-specific guidance at the national level has been in place since 2012. While it is acknowledged that this guidance requires updating, as reflected in more recent statutory land use planning documents, principles contained therein remain sound.

More locally within Bray, the Wicklow CDP sets a need for a greater range and volume of retail development; however, it recognises the challenges of setting specific retail floor space requirements. However, such retail floor space requirements have been set for the former Bray Golf Club lands which are based on regional and county retail strategies that predate the NPF, RSES and the Wicklow CDP.

3.6 Conclusions

The policy context review highlights the emphasis on compact growth and town-centre-first development to combat urban sprawl and enhance the delivery of vibrancy in town centre areas, addressing issues such as vacancy and dereliction.

The policy context also reveals the importance of protecting the vitality and viability of town centres, including discouraging the development of large-scale retail developments outside town centres. The focus is on mixed-use developments capable of creating sustainable communities, catering for the residents' residential and commercial needs while strengthening the town centres' role and not undermining existing retailers.

In light of the above, it is clear that it is necessary to revise SLO 3 to ensure its alignment with national, regional, and local planning policies. The current rigid requirements set under SLO 3, particularly with respect to retail and commercial floorspace, should be replaced to focus on the assessment of the proposal on delivering compact, high-quality and sustainable development while reinforcing and supporting the function of Bray's town centre.

Finally, the requirement that no more than 20% of car parking spaces be at 'open, surface locations' reflects the expectation at the time of drafting that the development of the subject lands would be primarily as a shopping centre. This requirement is not appropriate for the residential led development, with a high proportion of traditional own door housing now proposed.

Section 6 further details the recommendation for revising SLO 3.

4 HEALTH CHECK: BRAY TOWN CENTRE

4.1 Introduction

As noted previously, this submission recommends revising the minimum level of retail and commercial floorspace required to be provided within lands forming part of SLO 3, which is deemed necessary to ensure that the remaining lands at the former Bray Golf Course lands adjacent to Bray's town centre can be developed while positively adding to its vitality and vibrancy. In this regard, it is essential to consider the findings of the **Bray Town Centre Health Check 2019¹** (BTHC 2019).

The BTHC 2019, commissioned by Wicklow County Council and prepared by Future Analytics, provides valuable insights into the challenges and opportunities facing Bray's town centre. It evaluated the retail performance and viability of the town centre across different indicators. The defined retail core area includes Bray's Main Street and the streets connecting to the seafront, extending from the Main Street/Killarney Road junction in the south to the Dublin Road/Dargle junction in the north. The catchment area comprises Bray's town centre and its environs. **Figure 3-1** illustrates a map identifying the BTHC 2019 area and the SLO 3 lands.

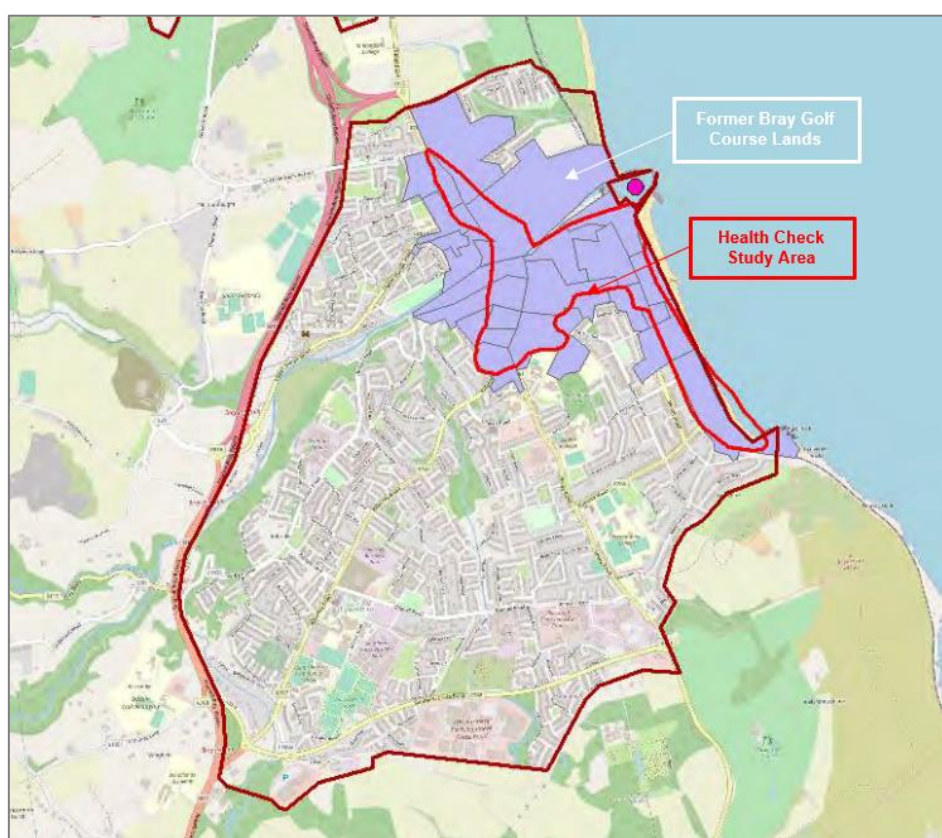


Figure 4-1: Health Check Area Boundary (Bright Red)
(Source: Based on BTHC 2019)

4.2 Health Check 2019

4.2.1 Retail Mix, Range of Offerings & Vacancy

The BTHC 2019 revealed that Bray town's retail landscape is characterised by a mix of traditional market town characteristics and modern retail offerings, primarily concentrated along Main Street and its surroundings.

¹ Previously available on Wicklow County Council website.

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A range of businesses, including restaurants, cafes, pubs, and various retail shops, cater to residents and visitors. However, many businesses focus on food and beverage, reflecting the trend toward experiential shopping and revealing a need for more diversity in retail composition; see **Figure 3-2** below. Moreover, a lack of large retail anchors and high-end stores was also identified.



Figure 4-2: Location of Most Common Retail Outlets

Source: Figure 3.19 of the BTHC 2019

In terms of vacancy, BTHC 2019's results confirmed a vacancy rate of 10% (914 commercial addresses, with 92 being vacant), below the national average (15%) but within a concentration of vacant units along the Main Street, including prime sites such as the former Town Fair building and the Bray Design Centre; **Figure 3-3**.

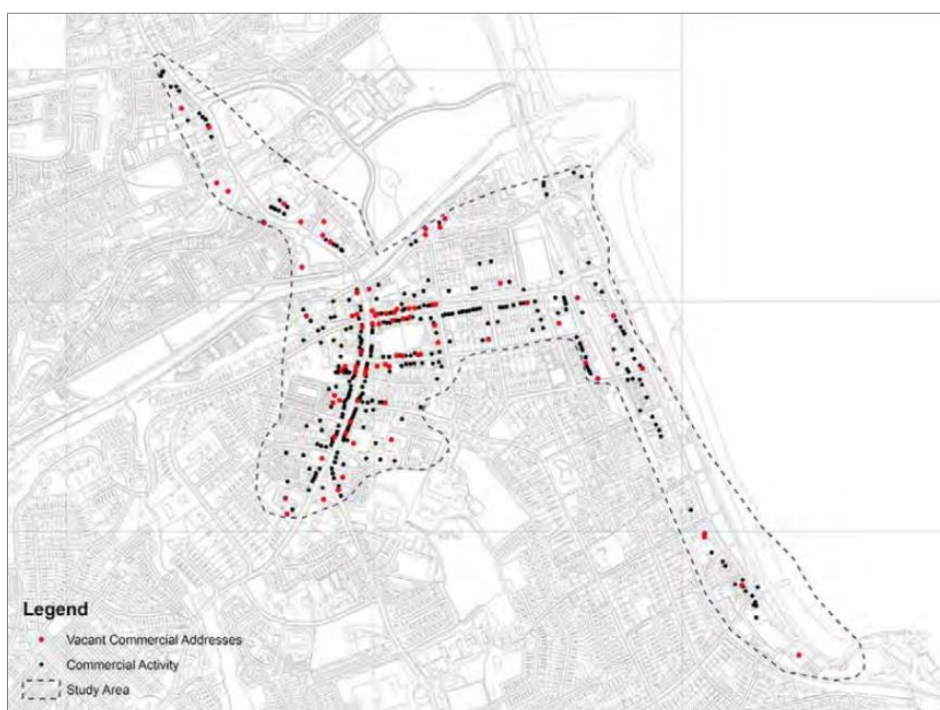


Figure 4-3: Vacant Commercial Premises

Source: Figure 3.20 of the BTHC 2019

4.2.2 Consultation

The BTHC 2019 also incorporated public consultation with stakeholders, including local authorities, businesses, community groups and residents. Key issues identified during the consultation process include general dissatisfaction (see **Figure 3-4**) with the existing retail offer, particularly the need for more variety and quality shopping facilities.

In response to the above, key recommendations were proposed, including a focus on developing retail in Main Street, the development of the Florentine Centre, and additional cleaning.

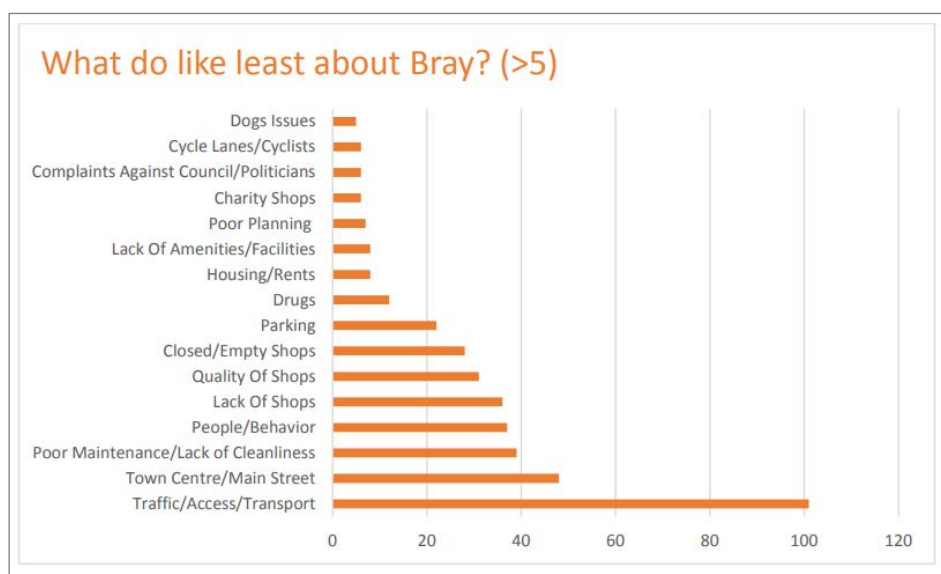


Figure 4-4: Online Survey Results

Source: BTHC 2019

4.2.3 Proposed Actions

In recognition of the challenges affecting Bray, the BTHC 2019 proposed several actions, including:

- Developing a *Retail Charter and Rental Strategy* to attract anchor tenants and achieve a balanced retail mix.
- Initiating a *Shop Front Partnership Project* to improve storefront aesthetics and engagement.
- Encouraging independent retailers to enhance the town's character and variety.

These initiatives aimed to improve the town's retail appeal, increase the retail mix, reduce vacancies, and create a vibrant shopping environment.

4.2.4 SWOT Analysis

The BTHC 2019 outlined strengths, weaknesses, opportunities and threats (SWOT) concerning retail provision and the town's future. Vacancy rates and lack of retail diversity were confirmed as key weaknesses, while the suburbanisation and hollowed-out town centre were deemed as threats to the town's future.

4.3 Updates post-2019

As per the Census 2022 results, the population of Bray grew by 2.6% (based on the average growth of the electoral divisions in that part of Bray). This contrasts with a more robust growth (7.9%) observed in the administrative areas covered by Wicklow County Council and Dun Laoghaire-Rathdown County Council.

Since the publication of the BTHC 2019, changes have occurred. In the interest of accuracy, RPS based on data sourced from Geodirectory further assessed the retail landscape regarding retail offers, variety, and vacancy rates within Bray's town centre post-2019 until 2023.

4.3.1 Changes in Retail Developments

Bray Central (formerly Florentine Centre) opened in 2022 at Bray Main Street, to include 25,000 sq.m for retail and leisure. However, uptake has been slow, with many units not being occupied. Despite the presence of an anchor retail (Pennys), many units remain vacant² (See **Figure 3-5**).



Figure 4-5: Bray Central

Source: Google Maps Streetview

Given the low uptake on retail units, an application for change of use from 2,128 sq.m of the overall permitted retail space to residential use was made to Wicklow County Council (Ref. 221357), which was refused. This was further appealed to An Bord Pleanála (ABP Ref. 316075-23³) which decided to grant permission for the development. As noted by the applicant during the application process, the reasons for the change of use were commercial due to the limited demand or commercial appetite for retail and commercial space. In the words of the ABP Inspector following a site inspection, *“the centre has not generated as much interest, or occupancy, as expected.”*

Notwithstanding the above, the future of the Bray Central shopping centre is now uncertain after a UK-based loan servicing group appointed receivers⁴ to a company co-owned in November 2024.

4.3.2 Changes in Retail Offerings & Mix

The post-2019 assessment indicated a continued trend toward food and beverage outlets, with a concentration of these in Bray’s Main Street and nearby streets and limited growth in high-end or independent retail options. This imbalance restricts the overall shopping experience.

Please refer to **Appendix B** for relevant figures showing details on retail offerings and mix post-2019.

4.3.3 Changes in Vacancy Rates

The vacancy rate was approximately 10.6% (with 41 out of 386 commercial addresses unoccupied) and 9.6% within a broader area (with 47 out of 489 unoccupied). This rate is slightly below the national average of around 14%; however, it represents an increase in the previously recorded vacancy rate of 10%. Moreover, the number

² Source: <https://search.savills.com/property-detail/f1ec19b3-8f32-4789-8f96-ea420c2c8d0c>

³ Source: <https://www.pleanala.ie/en-ie/case/316075>

⁴ Source: <https://www.independent.ie/regionals/wicklow/bray-news/wicklow-td-gutted-as-receivers-appointed-to-company-behind-bray-central-shopping-centre/a371354899.html>

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of retail offers has been reduced from 914 to 875, translating into a more limited level of variety and impacting the levels of shopping vitality.

Key vacant sites remain the former Town Fair building and other prime locations that present opportunities for redevelopment.

Please refer to **Appendix B** for relevant figures showing details on retail vacancy post-2019.

4.3.4 Opportunity Sites

The current Bray LAP identifies several Opportunity Sites within Bray's town centre, designated for the development of significant new retail, retail services, and commercial and cultural/community spaces.

- **Former Heiton Buckley's**, Dublin Road (approximately 0.6 hectares zoned 'town centre'). Key Objectives include:
 - The site is deemed suitable for high-intensity mixed commercial and residential development.
 - It aims to facilitate a mixed-use development encompassing commercial, retail, residential, community, and cultural uses.
 - A high-density development, optimising the use of this serviced urban land, is expected, with a proposed height of 3 to 4 storeys.
 - **Update as of December 2024: The site remains underdeveloped**, and the objective of creating a mixed-use development has not been realised. Currently, old warehouses occupy the rear, and car sales businesses dominate the area, which features 2 to 4 storey developments.
 - Planning permission was sought by Aldi Stores (Irl) Ltd in 2015 (Ref. 142174) for the demolition of structures and construction of a discount food store. Wicklow County Council refused this during the application stage, and ABP refused it at the appeal stage. Further, a strategic housing development application was made by Silverbow Limited to ABP in 2022 (ABP Ref. 313442) to demolish existing buildings and construct 139 no apartments and a creche. No decision has been made yet.
- **Former Everest Centre**, Dublin Road (approximately 0.16 hectares zoned 'town centre'). Key Objectives include:
 - To facilitate a mixed-use development that includes commercial, retail, residential, community, and cultural uses.
 - Any proposed development adjacent to Castle Street should provide an active street frontage, particularly with active commercial spaces.
 - **Update as of December 2024: The land remains undeveloped**, planning permission was sought by Bray Property Development Ltd in 2022 for a residential development of 49 no. apartments. Wicklow County Council refused this during the application stage, and ABP refused it at the appeal stage (ABP Ref. 315393-22).
- **Former Chemical Plant and The Maltings** (approximately 0.33 hectares zoned 'town centre'). Key Objectives include:
 - The site is designated for a mix of uses, including commercial, residential, community, and cultural purposes. Retail use will only be considered acceptable if it enhances, rather than detracts from, the vitality and viability of the core retail area along Main Street.
 - **Update as of December 2024: The land remains undeveloped.** A planning application was made to Wicklow County Council (Ref. 24450) in November 2024 by Dungrey Limited, seeking permission to replace the existing old wooden hoarding with a new hoarding. A decision is currently pending by Wicklow County Council.

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- **Florentine Centre.**

- As noted in Section 4.3.1, Bray Central (formerly the Florentine Centre) opened in 2022 on Bray Main Street, adding 25,000sq.m for retail and leisure. Due to limited demand for commercial space, the operators sought to convert some of the originally permitted retail space to residential use. Recently, the future of Bray Central has become uncertain, as receivers have been appointed, indicating that the centre's difficulties have intensified.

4.4 Summary of Key Findings

Key findings from BTHC 2019 and the post-2019 assessment can be summarised as follows:

- Limited diversity in retail offerings, with a dominance of food and beverage outlets.
- Vacancy rates, while below the national average, are significant, particularly in prime locations along Main Street.
- Reduction in the number of retail premises and slow uptake of newly developed retail spaces, exacerbating existing challenges regarding lack of retail offerings.
- Public dissatisfaction with the retail landscape.
- Existing retail developments are facing challenges in ensuring retail space occupancy, which is adding to vacancy levels and detracting from town centres' vitality. In response, there is a transition away from the traditional retail model to overcome vacancy, providing for leisure and entertainment uses.
- Most of the Opportunity Sites identified in the existing Bray LAP with objectives to deliver intensive mixed-uses, including retail, remain undeveloped.
- Bray Central, which was completed as a large-scale retail development, is facing difficulties due to low uptake of retail uses.

Despite some progress, the fundamental challenges identified in 2019 persist, posing risks to the vitality and viability of Bray's town centre.

4.5 Conclusions

The findings of the BTHC 2019 and subsequent assessment completed by RPS highlight the persistent challenges facing Bray's town centre, including limited retail diversity, prominent vacancy rates, and the slow uptake of newly developed retail spaces. These issues need to be considered during the course of the preparation of the new Bray LAP.

Recent retail developments in Bray's town centre, such as Bray Central, show limited occupancy take-up, adding further pressure to vacancy rates and impacting the town's vitality levels. Other sites designated to accommodate mixed-uses (i.e., opportunity sites) and a component of retail space, while close to Bray's retail core, remain undeveloped.

Given the strategic location of the former Bray Golf Course lands adjacent to Bray's town centre, particularly the remaining lands, the Bray LAP must provide flexibility and adaptability for future development of the lands. Future proposals, including retail proposals, should be assessed on their merit to deliver quality experiences and cover the needs of residents rather than be based on achieving quantitative development standards of retail space. It is also essential that they can demonstrate no adverse effect on Bray's town centre in terms of retail offers and vacancy rates, and when possible, help in addressing the challenges in the town centre.

To achieve this and address existing weaknesses and threats outlined in the BTCH 2019's SWOT, it is deemed necessary that SLO 3 be revised to provide flexibility. **Section 5** of this submission further expands this recommendation.

5 RETAIL & OFFICE ENVIRONMENT

5.1 Introduction

The content in this section outlines the transformations in the retail and office sectors. It provides details of key trends, challenges, and shifts in consumer behaviours that are reshaping town centres' roles and influencing development prospects.

The findings from this section further reinforce the recommendation submitted in this submission to revise SLO 3 to facilitate the development of the remaining lands of the former Bray Golf Course lands. Given the identified challenges the retail and office markets face, shifting away from rigid floor space requirements is more critical than ever. Overly prescriptive floor space requirements risk lands not being developed due to a lack of demand for retail and office space, which the market cannot absorb.

5.2 Current Trends in the Retail Market

5.2.1 Changing Consumer Practice

Over the past years, the retail sector has undergone a significant transformation, driven mainly by the rise of e-commerce. According to the European E-Commerce Report 2024⁵ 87% of the Irish population aged 16-74 bought goods or services online in 2024, compared to 67% in 2019, and 95% of the country's population can access the Internet. The report notes that *"Ireland's e-commerce has flourished, recording strong performances over the past three years. This growth is driven by the convenience of shopping anytime, the wider product range, competitive pricing (...)"*.

Irish data on e-commerce is incomplete, given that it does not include purchases made on non-Irish-based websites. Internationally, the percentage of total retail sales made online is approximately 20% in countries such as Norway and Denmark, whose population sizes are closer to Ireland.

This shift to e-commerce away from traditional shopping was further accelerated by the COVID-19 pandemic, reducing the demand for traditional retail spaces, particularly in sectors like apparel, beauty, and grocery.

The COVID-19 pandemic also influenced and reshaped consumer behaviour. Thus, many opt to shop online due to convenience and safety concerns. While online sales have dipped slightly since their peak during the pandemic as physical retailers re-opened, they remain significantly higher than pre-COVID levels⁶.

The broader impacts of this shift include reduced footfall in town centres, which challenges the viability of traditional retail stores and ultimately translates into a decrease in the number of physical retail stores. In response, retailers are increasingly transitioning to mixed-use spaces, prioritising experiential offerings over large-scale retailing to meet changing consumer demands. As the shift continues, the impacts on traditional retail will also be felt, and their effects on town centres are expected to be more visible from reduced footfall and physical retail store closures.

5.3 Current Trends in the Office Market

5.3.1 Shift to Hybrid Work Models & Increased Demand for Flexible Spaces

Like the retail sector, the office sector has undergone a significant transformation. The office market is experiencing a profound shift as hybrid work models become the norm, accelerated by the COVID-19

⁵ [2024 European E-commerce Report](#)

⁶ 4.9% of all retail generated online in April 2022 versus 15.3% in April 2020. Source: CSO.

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pandemic. Thus, the *2023 Remote Working in Ireland*⁷ survey shows the sea change in working practices. 59% of respondents are currently working hybrid (sometimes remotely, sometimes onsite), and 38% are working fully remotely. 3% are working fully onsite. Moreover, 75% of respondents indicated that their employer has a remote/hybrid working policy.

In response to this shift, businesses are moving away from traditional office layouts, favouring flexible spaces that accommodate evolving work patterns. This has led to a decline in demand for conventional office spaces and a focus on adaptability.

In Ireland, during 2024⁸ industry data show an office vacancy rate of 17.3% in Q1, up from 16.5% at the end of 2023 and slightly compressed to 17.2% in Q3. This reflects a challenging market environment influenced by hybrid work trends and an oversupply of office spaces, a combination of new, refurbished and grey spaces all coming into the market simultaneously.

The demand for flexible, multi-purpose office spaces is growing, aligning with a broader trend toward mixed-use developments integrating work, living, and leisure. As fewer employees work on-site full-time, town centres have seen reduced footfall, which impacts adjacent sectors like dining and convenience retail and the towns' overall vitality.

It is envisaged that future office demand will be concentrated in prime locations, mainly in Dublin City Centres. Demand for new office space in peripheral and regional locations will be very limited.

5.4 Challenges Facing Businesses

5.4.1 General Economic Environment

Generally, the Irish economy is performing very well; inflation rates have initiated a decreasing period following a period of high rates, although they remain high in the services sector. However, it is unclear whether this positive outlook will continue. Inflation remains challenging, affecting consumer spending and increasing the cost of living for consumers. Moreover, Ireland's significant reliance on corporation tax revenues from multinational corporations has been positive. Yet, this dependence poses risks, particularly due to potential policy changes under the new U.S. administration following the election of President Trump in 2024.

5.4.2 Supply Chain Changes

Supply chain disruptions, intensified by the pandemic and geopolitical tensions and conflicts, have led to longer delivery times, higher costs, and a shift toward shorter, more secure supply chains. While this provides stability, it increases production costs, which businesses must absorb or pass on to consumers. Should the costs remain at an elevated level, the viability of many retail outlets will be compromised.

5.4.3 E-Commerce & Hybrid work

As stated in previous sections, hybrid work models and e-commerce have reshaped consumer behaviour, reducing footfall in town centres and challenging the viability of traditional retail outlets.

5.5 Shifting Role of Town Centres

The evolving retail and office sector mirrors significant changes in the role of town centres, driven by consumer behaviour and societal shifts.

Internationally, key trends reshaping town centres include:

⁷ [2023 Remote Working in Ireland Survey](#) (University of Galway, 2024)

⁸ [Q1 2024 Office Market Report](#) and [Q3 2024 Office Market Report](#) (Colliers Ireland, 2024)

Submission to Pre-Draft Stage Bray Municipal District Local Area Plan 2025-2031

- A reduction in traditional retail sectors and financial services, as many now operate online.
- An increased reliance on public transport and micro-mobility, alongside reduced car road space, reduced car ownership rates in urban areas favouring local convenience shopping.
- A growing elderly population and the need for local services near residential areas.
- A reduction in footfall in traditional commercial areas, particularly in town centres, due to hybrid and remote working models.

The above changes favour the development of mixed-use communities, where retail provision is integrated with residential, leisure, and public spaces. This aligns with the 15-minute city concept, where essential services and amenities are within a short distance. This shift prioritises local convenience, public transport, and environmental sustainability, aligning with consumer demand for unique, community-focused experiences over traditional ‘clone town’ retail landscapes. In short, the traditional retail development model is dead.

Despite these challenges, opportunities exist for town centres to adapt and thrive if the appropriate frameworks are in place that:

- Prioritise localised and convenience-focused retail for residents.
- Deliver integrated housing, leisure and flexible workspaces into a cohesive urban environment.
- Allow for flexibility and adaptability to accommodate shifting needs and uses.

Given the above, proposals for significant mono-retail developments or traditional retail-orientated projects in town centres and surroundings are unlikely to be brought forward in the foreseeable future.

As identified in **Section 4**, Bray’s town centre is also suffering from its own challenges (i.e., lack of retail offerings and lack of mobilisation of Opportunity Sites). These challenges, combined trends shape the role of town centres and the retail and office markets and hold significant implications for future retail development prospects. In the context of this submission, while the forthcoming 2025-2031 Bray LAP may identify a need for retail development in the lands, any new version of SLO 3 should be flexible and agile. We suggest the (see **Section 6**).

5.6 Ongoing Changes in Retail Development

Ongoing changes observed to the retail mix in shopping centres and retail parks reflect broader trends discussed in **Sections 5.1, 5.2 and 5.4**, including shifting consumer behaviour and challenges in the retail and office markets. In many cases, this has led to a reduction in retail floor space and an increasing prevalence of non-retail uses within shopping centres and retail parks, aligning with the shifting role of town centres. Below, we outline examples of the recent changes to shopping centres and retail parks within Dublin and its metropolitan area. These are considered relevant in the overall context of this submission and also due to proximity to the former Bray Golf Course lands, such as the case of Bray Central.

• Bray Central

As previously noted in **Section 4** of this document, planning permission was granted to change the use from retail to residential (Ref. ABP 316075-23) at Bray Central. Once the application is enacted, vacant retail floor space within Bray’s town centre will be effectively reduced.

The applicant noted limited demand for the originally permitted retail space, prompting the change to alternative uses, effectively reducing vacant retail space in Bray’s town centre.

Bray is a Level 2 Major Town Centre in the retail hierarchy for the region.

• Dún Laoghaire Shopping Centre

In 2020 (Ref. D20A/0324), a significant change of use was approved for the Dún Laoghaire Shopping Centre, converting vacant retail space into a healthcare facility. This resulted in the loss of 2,250 sq.m of retail space, including an anchor store and smaller units. Within DLRCC’s planners report, it is noted that the above development would result in, “*a substantial reduction in the quantum of retail floor space in the town centre*”

Submission to Pre-Draft Stage Bray Municipal District Local Area Plan 2025-2031

location... so Level 3 would not be available for other uses such as retail in the longer term. However, having regard to the location of the proposed development above Levels 1 and 2 which also have vacant units, it is considered the change of use would be acceptable in the particular circumstances of this case."

The high vacancy rate was submitted as part of the applicants' rationale for the change of use and central to this decision.

Dun Laoghaire is a Level 2 Major Town Centre in the retail hierarchy for the region.

- **Frascati Centre**

The Frascati Centre has an extensive planning history illustrating a transition from originally permitted retail floor space converted into other uses.

Planning applications under Ref. D18A/1069, Ref. D19A/0196, and Ref. D19A/0960 translated into changes of use from retail to other uses, including medical facilities, gyms, financial/professional services, and residential. Moreover, planning applications under Ref. D17A/0599, Ref. D19A/0668, Ref. D20A/0503, and Ref. D21A/0468 meant that the anchor store unit was amalgamated and then subdivided.

More recently, planning applications have been made to change the use of a significant amount of floor space within the shopping centre to accommodate residential uses under Ref. D17A/0950, Ref. ABP-308046-20, Ref. D21A/0706, and Ref. D21A/0996.

Regarding the latter application, the agent's planning report stressed the importance of the proposal not only to ensure the commercial viability of the centre but also appropriate for the long-term sustainability of the centre, stating: *"Since the announcement by Debenhams that they would cease trading in Ireland, the applicant has been working to develop a strategy for the vacant Anchor Unit 1. The departure of this tenant provides the opportunity to consider how to create a solution which enhances the long-term sustainability of the centre for all of the Frascati Centre."* DLRCC's planner noted the proposed use is acceptable as *"the continued occupation of the centre will help ensure the continued vitality and viability of the centre."*

Finally, in March 2023, it was announced that *Homestore and More* would occupy the basement level of the former *Debenhams* unit and that the restaurant chain *Musashi Sushi* would also occupy a unit in the centre.

With regard to the above, it is clear that multiple planning applications over time have replaced retail units with alternative uses in the Frascati Centre, including medical facilities, gyms, professional services, and residential units. The departure of tenants like Debenhams highlighted the challenges faced by the traditional retail model.

Blackrock is a Level 3 Town And/Or District Centres & Sub-County Town Centres (Key Service Centres) in the retail hierarchy for the region.

- **Clerys**

Clery's department store on O'Connell Street closed in June 2015. Permission was granted in December 2016 under Reg. Ref. 3442/16 to provide a mixed use development on the site. This permission included a hotel (7,800 sq.m), office space (8,974 sq.m), retail (5,478 sq.m), and café / restaurant / bar (3,822 sq.m).

The proposed development has reduced the original retail floorspace to improve the experience. The agent's planning report noted, *"Complementary non-retail uses such as a café and restaurants that add to the vibrancy of the street and create a mixed-use environment to provide for a more integrated shopping and leisure experience, will be considered favourably but with regard also to the primary retail function of the street."*

O'Connell Street and North Earl Street are Category 1 shopping streets according to the Dublin Retail Strategy (as part of the Dublin City Development 2022-2028), which notes *"it is essential to ensure that higher order retail outlets will be the principal use on these streets"*. However, DCC identified current changes in retail environment and consumer demands and accepted the proposed use.

The DCC planner report (following the receipt of Additional Information) notes that *"a reorganisation of the retail floorspace and format in the store as part of the proposed development is essential to meet modern day retailing requirements. It is noted that the need for flexibility in the retail formats of historic stores due to the ongoing changes in the retail environment and consumer demand is recognised in the scheme of special planning control for O'Connell Street... taking into account the relevant planning policy framework and current and emerging trends in retailing, the quantum and format of retail space proposed is appropriate for the location and that the mix of uses proposed will result in a new viable and active high quality urban quarter."*

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As a condition of this permission, the permitted development stated a proposed restaurant unit fronting onto Earl Street North should be used as retail space. However, under Reg. Ref. 5171/22, permission was granted in December 2022 to amend the aforementioned permitted development and the unit was approved as a restaurant, reducing the retail space by 65 sq.m.

‘Clery’s Quarter’ opened in 2023 and secured tenants for the 2 no. large retail units.

Dublin City Centre is the Level 1 Metropolitan Centre in the retail hierarchy for the region.

Dundrum Town Centre

Dundrum Town Centre has an extensive planning history since receiving planning permission in 2000, making way for several amendments from its original conception as a traditional large-scale retailing development, to food, leisure, and entertainment uses, and thus confirming the challenges faced by the traditional retail model. A summary of key applications is as follows.

- Ashgrove Terrace (2018): A new development added restaurants, a food hall, and leisure spaces, enhancing vibrancy in the area. Planning application under Ref. D18A/0140. Within the DLRCC planners report, a conclusion states that the proposed development, *“has the potential to deliver a vibrant addition to both Dundrum Village and Dundrum Town Centre.”*
- Internal Modifications (2018): The application (Ref. D18A/0565) to change the use from retail to restaurant and leisure areas was approved. This resulted in a reduction of 397 sq.m in retail space previously permitted. The DLRCC planners report stated, *“The changes in the quantum of uses are considered acceptable given the location n of the uses within the Town Centre.”*
- Anchor Retail Unit Changes (2018): The application (D18A/0580) to change the use from retail space to restaurants and leisure uses due to declining footfall was approved. This resulted in a reduction of 1,223 sq.m and 1,329 sq.m in retail spaces previously permitted. The DLRCC planners report noted, *“it is considered that this loss of retail and increase in restaurants is acceptable due to lack of retail footfall”*.
- Other: Several other recent changes of use applications have occurred, including from vacant betting office to café/restaurant (Ref. D22A/0361), from retail to restaurant (Ref. D21A/0195), and from office to restaurant/bar (Ref. D19A/0400).

Dundrum is a Level 2 Major Town Centre in the retail hierarchy for the region.

Cherrywood

Cherrywood is a Strategic Development Zone (SDZ) in Dún Laoghaire-Rathdown council area. The Planning Scheme was approved by ABP in April 2014 under Reg. Ref. ZD06D.ZD2010, as amended. The permitted development of Cherrywood Town Centres included a mixed use development including retail (c.20,000 sq.m), high intensity employment (c.23,000 sq.m) and non-retail uses (c.31,000 sq.m). Permission has been subject to a number of amendment applications however development of the significant retail development permitted has not yet been completed.

Cherrywood is a Level 3 Town And/Or District Centres & Sub-County Town Centres (Key Service Centres) in the retail hierarchy for the region.

5.7 Summary of Key Findings

The information and analysis above highlight several critical findings related to the retail and office sectors with implications for the future developments in the former Bray Golf Course lands and Bray’s town centre:

- **Challenges Facing Retail and Businesses:** Retail and commercial businesses within all centres at all levels of the retail hierarchy face significant pressures. The rise of e-commerce continues to reduce the demand for traditional retail spaces, while inflation and elevated energy costs strain profitability. Supply chain disruptions, evolving consumer preferences, and the impacts of hybrid work models have created further uncertainties and create further risks for future retail proposals.

Submission to Pre-Draft Stage Bray Municipal District Local Area Plan 2025-2031

- **Shifting Role of Town Centres:** Town centres are evolving into spaces prioritising experiential consumption, mixed-use development, and community-focused activities. Retail uses are no longer the dominant function for town centres. This shift reflects broader changes, including remote work and preference for online shopping.
- **Retail Developments:** Recent developments illustrate a consistent trend in reduction in retail floor space across shopping centres in Dublin and its metropolitan area and a shift toward non-retail uses, in line with the broader trends identified in previous sections. These changes underline the diminishing viability of traditional retail models and the growing emphasis on mixed-use developments. Future retail based policies must consider these trends carefully.

5.8 Conclusions

The changing retail and office markets and the shifting role of town centres underscore the risks of maintaining unwavering retail and commercial floor space requirements, such as those prescribed for the former Bray Golf Course lands under the SLO 3 under the existing Bray LAP, particularly given the proximity of remaining undeveloped lands to Bray's town centre.

The evidence and findings presented in the above sections demonstrate that changes have reduced demand for traditional large-scale retail and commercial developments, leading to high vacancy rates and underutilised spaces. This includes the case of Bray Central.

Given the above, it is evident there is a need for SLO 3 to be revised to provide more flexibility, away from rigid minimum retail and commercial floor space requirements and towards a performance based approach.

While the forthcoming 2025-2031 Bray LAP may identify a need for a level of retail and commercial provision on the lands, proposals should have the ability to be assessed on their merit and, when possible, contribute towards addressing the challenges in Bray's town centre, rather than solely be based on achieving a minimum quantitative development standards of retail or office space. **Section 6** further details the recommendation when reviewing the terms of SLO 3.

6 RECOMMENDATIONS & CONCLUSIONS

6.1 Recommendations

The information presented in this submission highlights the need to revise elements of SLO 3 in the forthcoming Bray Municipal District Local Area Plan 2025 -2031.

The review of the policy context in **Section 3** illustrates the emphasis now being placed on delivering compact and sequential growth, guided by a town-centre-first and placemaking approach. National and regional policies emphasise directing residential development toward built-up areas to combat urban sprawl and promote high-quality, mixed-used spaces to enhance town centres' vitality and vibrancy.

Any planning policy and objectives for the subject lands must align with national and regional policy to ensure future proposals deliver compact and sequential growth for Bray. It should focus on mixed-use and sustainable development that strengthens Bray's town centre and adds to its vibrancy. A development policy guided solely by quantitative floorspace requirements risks the long-term sustainability of the lands and Bray's town centre.

As presented in **Section 4**, which reviews the Bray Town Centre Health Check 2019, Bray's town centre continues to face challenges, including high vacancy rates, limited retail diversity and slow uptake of newly developed retail spaces such as Bray Central. Most of the Opportunity Sites identified in the 2018 Bray LAP remain undeveloped despite proximity to Bray's Main Street. These findings call into question the need for a substantial quantum of additional retail and office floor space, particularly in more peripheral areas. Given the location of the former Bray Golf Course lands adjacent to Bray's town centre, development policy should focus on assessing the merit of new proposals on the lands to respond to local needs and complement Bray's town centre.

Section 5 outlines the transformative changes in the retail and office sectors, driven by changes in consumer behaviour, the rise of e-commerce, evolving working patterns and a shift away from car dependency. These changes are reshaping the role of town centres, transitioning into spaces prioritising mixed-use developments and community-focused activities, where retail is no longer the dominant function of town centres.

Evidence shows that existing large-scale retail developments are increasingly integrating leisure, entertainment and residential uses to address vacancy and occupancy challenges. Evidence also indicates that traditional retail model is being replaced due to a lack of demand and reduced commercial viability of retail spaces, particularly in town centres, which is evident also in Bray's town centre. Future policy guiding the development of the former Bray Golf Course lands must account for this shift. A development policy guided by retail and office commercial floor requirements would completely disregard the changing retail and office development landscape, hindering the strategic potential of the lands to deliver compact residential community and contribute to the vitality of Bray's town centre.

In summary, future development policy guiding the development of the former Bray Golf Course lands must reflect on and align with the current planning policy context, consider retail trends in Bray, challenges faced by Bray's town centre, and recognise evolving retail and office market conditions.

In light of the above, we hereby submit to Wicklow County Council the recommendation for a revised SLO 3 as part of the delivery of a flexible framework for the future development of the remaining lands in the former Bray Golf Course area, guided by the following principles:

- **Reflect Current Planning Policy Context:** A revised SLO 3 must acknowledge the strategic significance of the former Bray Golf Course lands in facilitating compact and sequential growth in Bray on a brownfield infill edge of centre site. Emphasis should shift from the application of rigid quantitative floorspace requirements to qualitative criteria that prioritise high-quality design and integration with Bray's town centre, enhancing the overall character of the area and the need for housing.
- **Focus on Sustainable and Mixed-use Development:** A revised SLO 3 should promote proposals that incorporate a diverse mix of uses, including residential and supporting commercial, leisure, cultural, community services and open spaces. Proposals should be assessed on merit, i.e., ensuring they deliver high-quality, sustainable mixed-use developments that complement existing amenities and uses

Submission to Pre-Draft Stage Bray Municipal District Local Area Plan 2025-2031

established in the area, such as those in permitted within Phase 1 and proposed for Phase 2 of Sea Gardens.

- **Focus on Sustainable Retail Uses & Providing Flexibility:** In light of evolving retail and office trends, a revised SLO 3 should facilitate retail and commercial developments that meet the needs of residents in the former Bray Golf Course area. Rigid quantitative floor space requirements should not be specified, allowing for retail and commercial proposals that can demonstrate no adverse impact on Bray's town centre, sufficient to support the emerging new residential community and which the market can absorb. Future retail and commercial initiatives should be evaluated based on their potential to create vibrant, high-quality spaces.
- **Seek Stakeholder Collaboration & Redefine SLO 3 Extent:** The revised SLO 3 should encourage active collaboration between the local authority and landowners to facilitate timely development of the lands throughout the new Bray LAP's duration. Additionally, it should recognise the progress made on the lands, specifically excluding areas already developed. This focus on the remaining undeveloped lands will expedite their development.

By adopting the above guiding principles, the revised SLO 3 will provide a flexible framework that enables proposals to be assessed on their merits, focusing on delivering high-quality, vibrant spaces that complement Bray's town centre and respond to local needs.

6.2 CONCLUSIONS

In light of the comprehensive analysis presented in this submission, it is evident that revising SLO 3 and associated zoning is crucial for the sustainable development of the remaining undeveloped portion of the former Bray Golf Course lands. The current minimum requirements associated with SLO 3, particularly those related to quantitative retail and commercial floor space, do not align with the current planning policy context or the latest changes in the retail and office markets and the shifting role of town centres and are unsustainable.

The strategic location of the former Bray Golf Course lands adjacent to Bray's town centre presents a unique opportunity to facilitate compact and sequential growth that adds to the vitality of Bray's town centre. However, this potential requires of a revised SLO 3 that provides a more flexible and adaptive framework that prioritises high-quality, mixed-use developments, rather than adhering strictly to outdated quantitative standards.

Therefore, we recommend that Wicklow County Council review SLO 3 to incorporate the guiding principles set out in **Section 6.1** of this submission to ensure that SLO 3 aligns with the current policy context, promotes sustainable and mixed-use developments, provides flexibility for retail and office space proposals, and recognises the importance of stakeholder collaboration. By implementing these recommendations, the revised SLO 3 will support the sustainable development of the former Bray Golf Course lands in such a way that contributes to the overall revitalisation and resilience of Bray's town centre.

Given the uncertainty around the timing of the commencement of Chapter 3 of the new Planning and Development Act 2024, we suggest the publication of a draft Bray MD LAP 2025-2031 be accompanied by a draft Variation of the Wicklow CDP. Such a proposed Variation would mitigate against the possibility that a draft Local Area Plan being aborted due to the commencement of Chapter 3, given that under the new Act only Local Area Plans that have been adopted will continue to have any standing. This Variation would also allow for the reference to large scale retail development being required on the former Bray Golf Club lands to be removed and for the possibility to update the CPO 6.2 to reflect Section 28 Ministerial Guidelines on *Regulation on Commercial Institutional Investment in Housing* and allowing the sale of residential units to commercial institutional investment bodies to enable mixed tenures and rental units to be accommodated on the subject lands. While such limits may be appropriate elsewhere in County Wicklow, given the largely rural nature of the county, the subject lands are functionally part of the Greater Dublin Area.

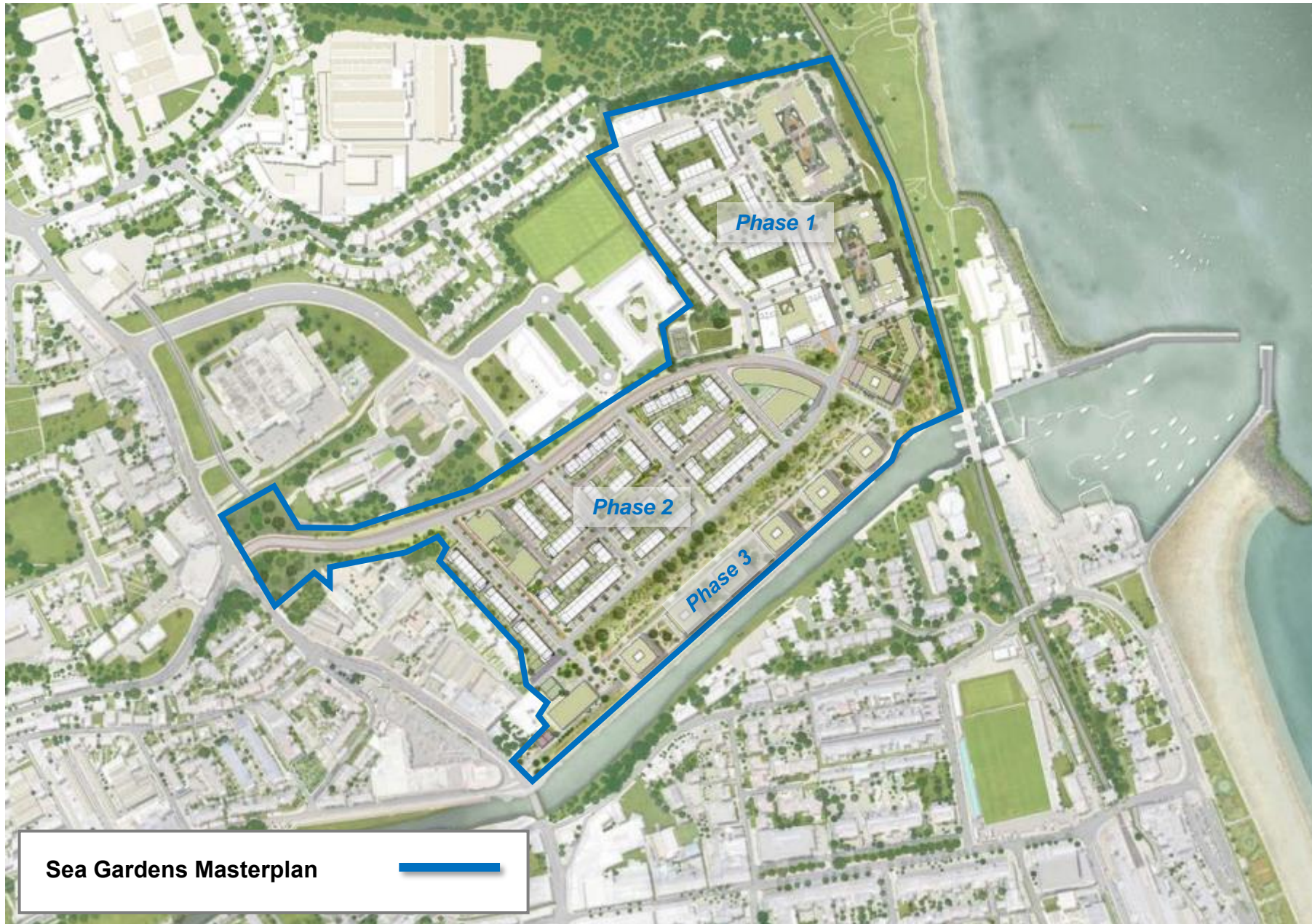
We respectfully request that the content of this submission be taken into consideration in the preparation of a draft Bray MD LAP 2025-2031.

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Appendix A

Sea Gardens Masterplan



Phase 1

Phase 2

Phase 3

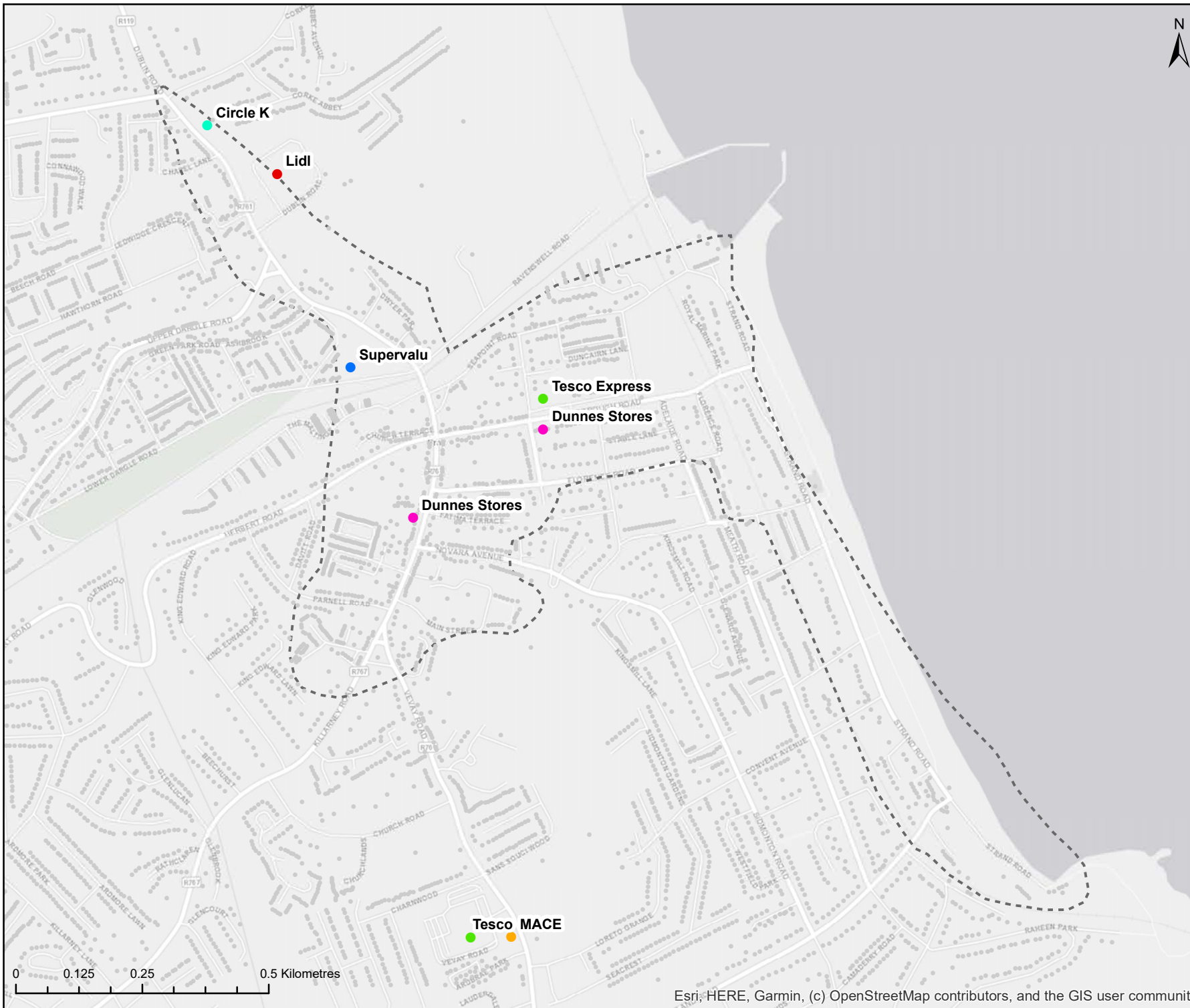
Sea Gardens Masterplan












Appendix B

Health Check Updates Post-2019 - Maps



Legend

-  Study Area
-  Circle K
-  Dunnes Stores
-  Lidl
-  MACE
-  Supervalu
-  Tesco

Data Sources: An Post
GeoDirectory Q422



Client

Ballymore

Harbour Point Bray Submission

Title

Main large retail facilities



West Pier
Business Campus,
Dun Laoghaire, E
Co Dublin, Ireland. W
rpsgroup.com/ireland

Issue Details

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IE000646-RPS-00-XX-DR-Z-AG0003

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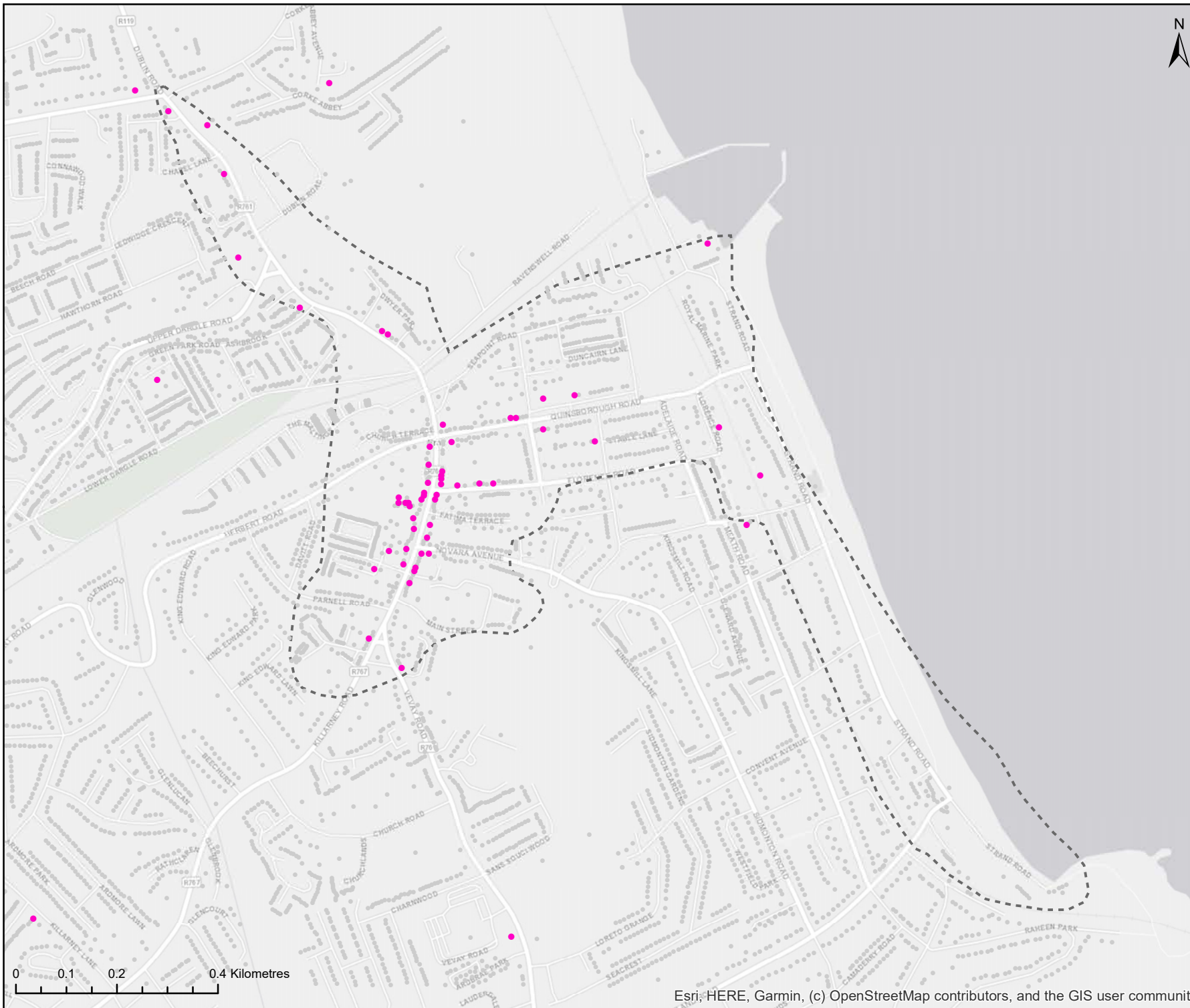
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Legend

-  Study Area
-  Wholesale and retail activities

Data Sources: An Post
GeoDirectory Q422



Client

Ballymore

Harbour Point Bray Submission

Title

Retail and wholesale activities in Bray

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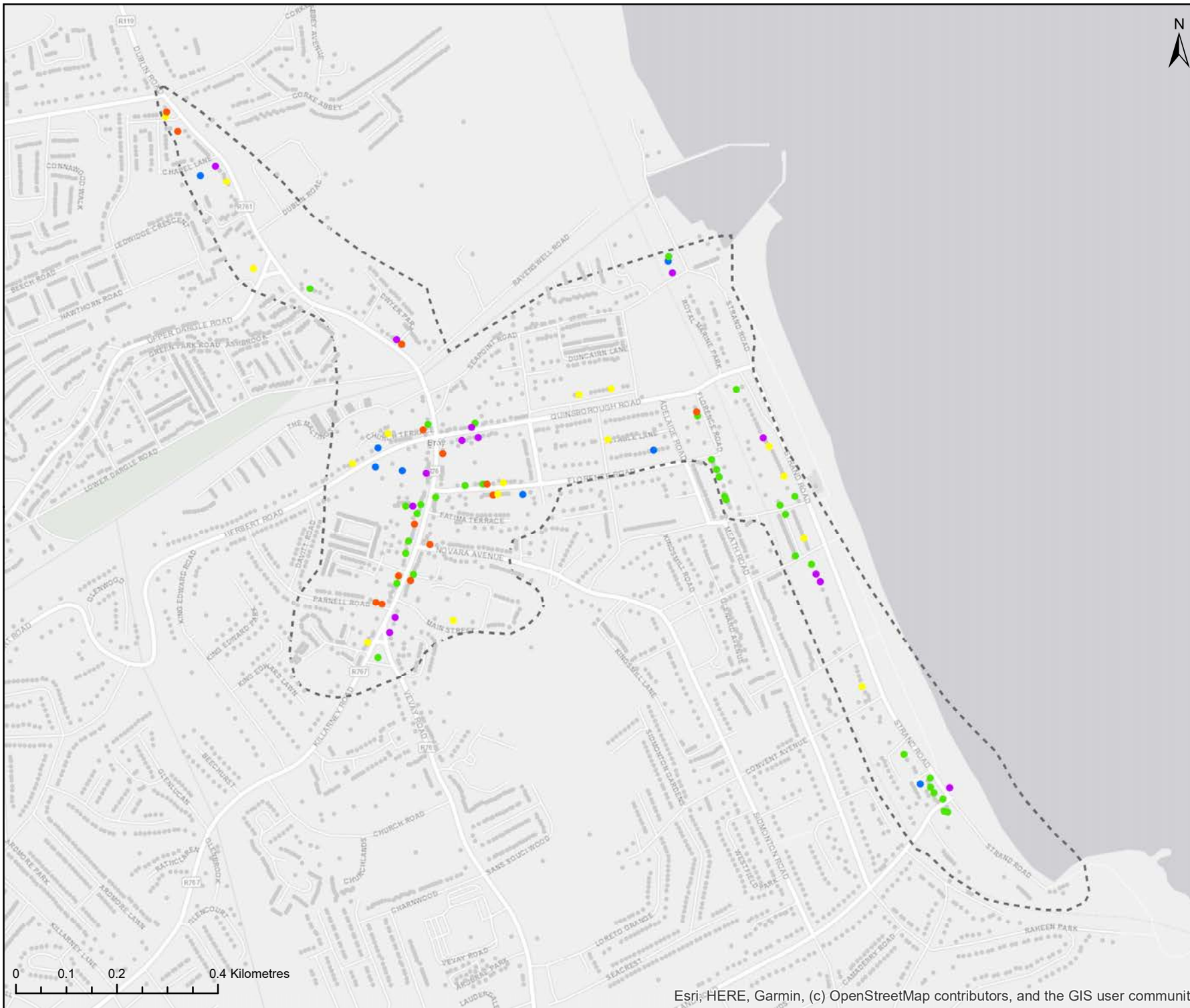
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Legend

- Study Area
- Activities Of Other Membership Organisations
- Beverage Serving Activities
- Hairdressing And Other Beauty Treatment
- Other Human Health Activities
- Restaurants And Mobile Food Service Activities

Data Sources: An Post
GeoDirectory Q422



Client

Ballymore

Harbour Point Bray Submission

Title

**Top five most frequent
commercial activity in Bray**

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Issue Details

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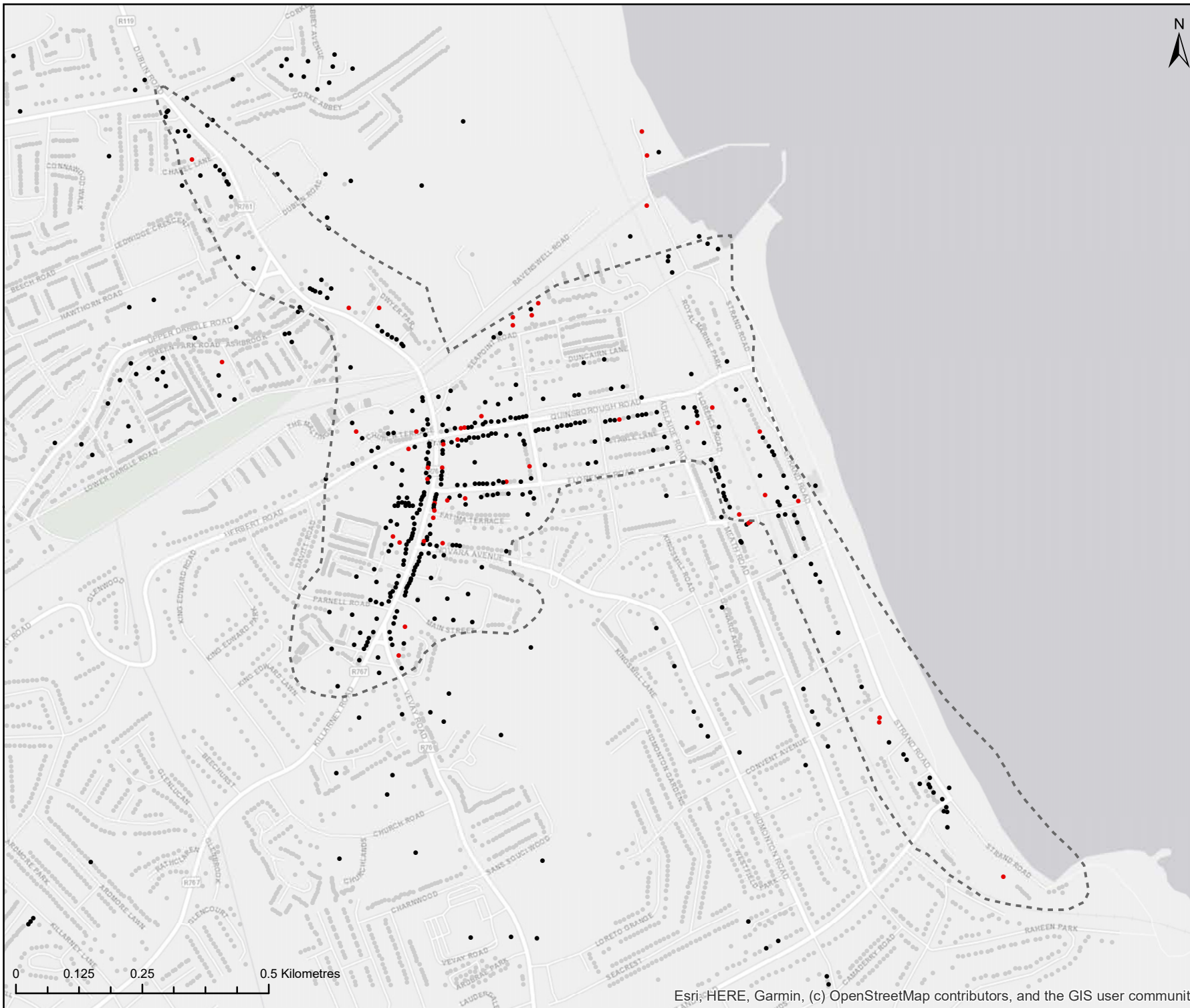
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Legend

- Study Area
- Commercial Activity
- Vacant Commercial Addresses

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

**Bray vacant and occupied
commercial addresses
(Q4 2022)**



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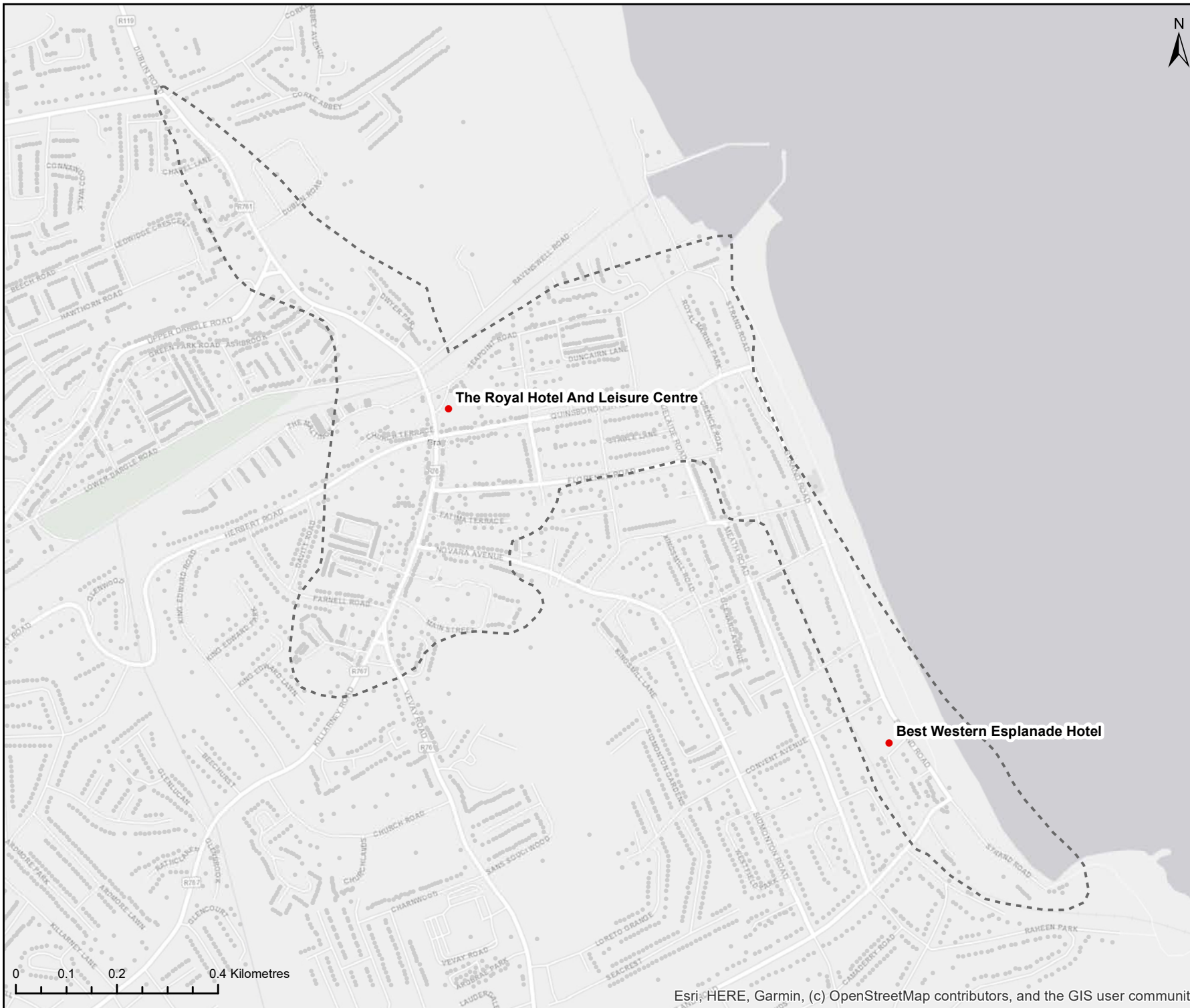
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Legend

-  Study Area
-  Hotels and Similar Accommodation

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

**Hotels and Similar
Accommodation
(Q4 2022)**



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Status: Rev: Model File Identifier:

S0 P01

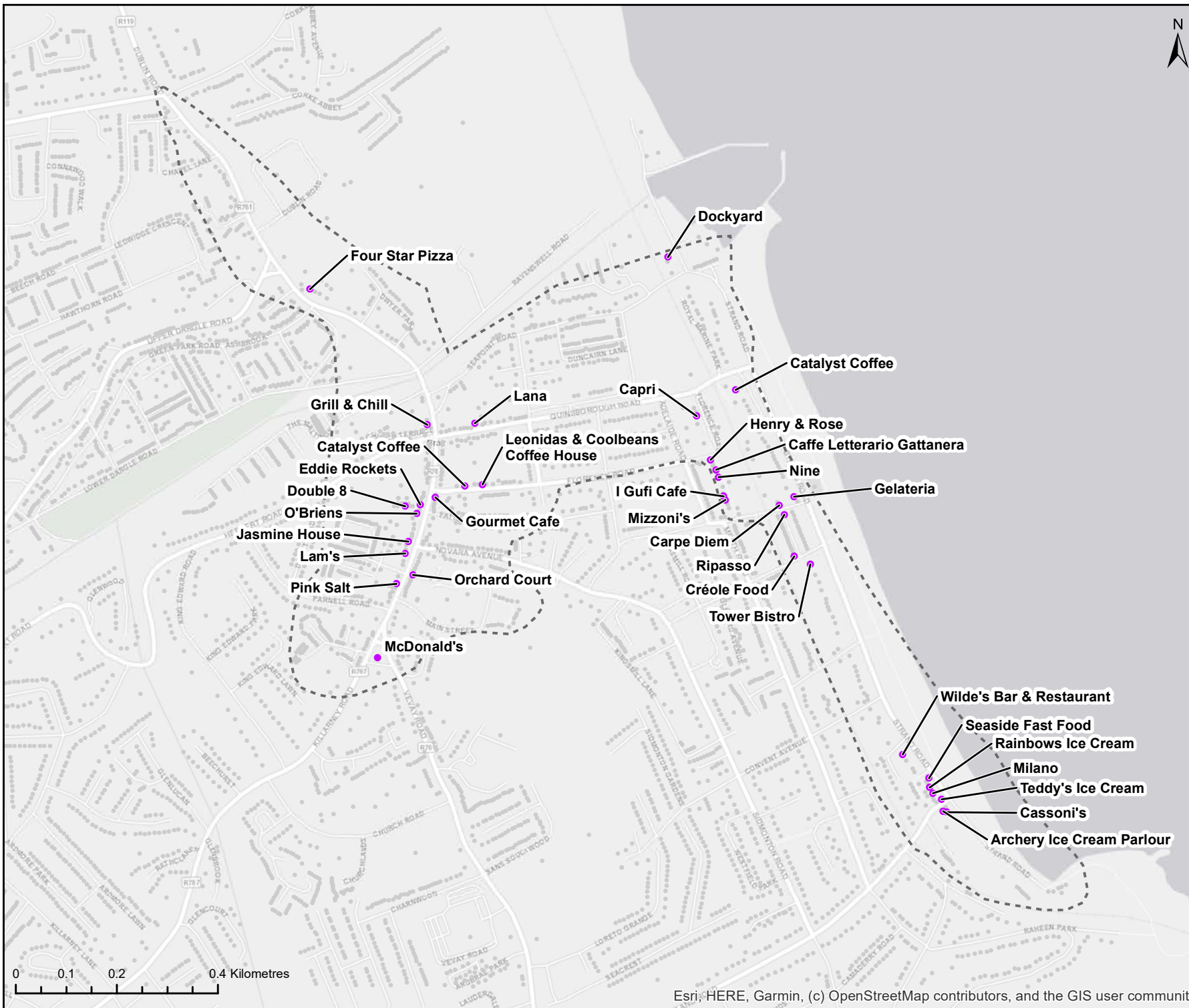
Drawn: NR Date: 18/04/2023

Checked: MH Scale: 1:10,000 @A4



Approved: HG Projection: ITM

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Legend

-  Study Area
-  Restaurants and Mobile Food Service Activities

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

Restaurants and Mobile Food Service Activities (Q4 2022)



West Pier
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Co Dublin, Ireland. T +353 (0) 1 4882900
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Issue Details

File Identifier:

IE000646-RPS-00-XX-DR-Z-AG0008

Status:

S0

Rev:

P01

Model File Identifier:

Drawn:

NR

Date:

18/04/2023

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Projection:

ITM

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Legend

Study

Beverage Serving Activities

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

**Beverage Serving Activities
(Q4 2022)**



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Issue Details

File Identifier:

IE000646-RPS-00-XX-DR-Z-AG0010

Status:

S0

Rev:

P01

Model File Identifier:

Drawn:

NR

Date:

03/05/2023

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Scale:

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Legend

- Study Area
- Other Amusement and Recreation Activities

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

**Other Amusement and
Recreation Activities
(Q4 2022)**



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Issue Details

File Identifier:

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Status:

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Rev:

P01

Model File Identifier:

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0 0.1 0.2 0.4 Kilometres

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Legend

-  Study Area
-  Activities of Sports Clubs

Data Sources: An Post
GeoDirectory (Q422)



Client

Ballymore

Harbour Point Bray Submission

Title

**Activities of Sports Clubs
(Q4 2022)**



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Issue Details

File Identifier:

IE000646-RPS-00-XX-DR-Z-AG0013

Status:

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Rev:

P01

Model File Identifier:

Drawn:

NR

Date: 03/05/2023

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