



# Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Silverbow Limited
Reference:	BRAYLAP-124654
Submission Made	December 16, 2024 12:49 PM

## Topic

Compact Growth - Housing – Population Growth

## Submission

Please see submission attached.

## Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Arklow

## Submission

Please see submission attached.

## File

Silverbow Limited Submission.pdf, 0.19MB

Bray MD LAP  
Administrative Officer,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow.

16<sup>th</sup> December 2024

**Local Area Plan for Bray Municipal District: Submission to Issues Paper**

Dear Sir/Madam,

On behalf of Silverbow Limited, owners of lands at Castle Street, Bray, I wish to make a submission in relation to the Pre-Draft Consultation Issues Paper for the Bray Municipal District Local Area Plan 2025 (BMDLAP25).

Silverbow Limited related companies are very active developers in Bray town, including an ongoing development at Putland Road (ABP-312020-21) and with an active SHD development proposal for lands at Castle Street in the town centre, known as the Heaton Buckley site (ABP-313442-22). The SHD was submitted in April 2022 and no decision has been made to date.

As part of the Castle Street SHD, out of an abundance of caution and responding to the regime in place at the time potential material contravention (MC) issues were forwarded for the attention of ABP to the then applying terms of SHD compliance protocols, as follows: -

*The statement of Material Contravention has been prepared to acknowledge matters which may be considered to be a Material Contravention of the Wicklow County Development Plan 2016-2022 and the Bray Municipal District Local Area Plan 2018-2024.*

The items included in the MC statement were: -

- Building Height;
- Car Parking;
- Public Open Space

The MC in relation to car parking and public open space both related to provisions in the Wicklow County Development Plan 2016-2022, which has been replaced by the Wicklow County Development Plan (WCDP) 2022-2028 and with which the undecided SHD application would now be considered to be compliant. With Bray having the best public transport provision in the county and a spectacular and renowned coastal setting, both parking and open space provisions in the WCDP could be further reduced/modified in the BMDLAP25.

Objective 2 of the Bray Municipal District Local Area Plan (BMDLAP) 2018-2024 (BMDLAP18) set out criteria for the development of the former Heiton Buckley site and in relation to building height, OP2 stated that *‘a high density development, that makes the best use of this serviced urban land will be expected, in a 3-4 storey development.’*

It is noted that other redevelopment sites in the town centre did not have a specific height prescription in the BMDLAP18. It is our submission that it is important that the BMDLAP25 recognises the importance of the opportunities for redevelopment of brownfield sites in the town centre and to specify development parameters in SLO designations that increase or eliminate height prescription. Future development proposals should be assessed in accordance with the SPPRs of the Urban Development and Building Heights Guidelines 2018.

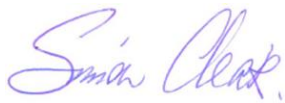
To facilitate ABP in processing the current application under SHD and progressing an application that had the support of WCC, it is hereby submitted that it is imperative that: -

- A new Bray Municipal District Draft LAP be published asap;
- Issues relating to Building Height in town centre redevelopment/regeneration sites should be clarified generally, or if there are to be SLO designations with building height guidance, the added height provisions should significantly differ to the prescription applied in the BMDLAP18.

More flexible prescription in a SLO context will encourage brownfield redevelopment in whatever model of planning permission procurement is pursued under the provisions of the new statutory LAP for the Bray Town Centre Area within the Bray Municipal Area.

Silverbow Limited wish to engage in the Local Area Plan process going forward and it is requested that this submission be taken into account in the preparation of the Draft Bray Municipal District LAP 2025, with the draft to be published asap.

Yours sincerely,

A handwritten signature in purple ink, appearing to read 'Simon Clear', with a stylized flourish at the end.

Simon Clear.