



Pre-draft Consultation - Bray Municipal District Local Area Plan (LAP) 2025

The Eastern and Midland Regional Assembly notes that Wicklow County Council has launched a pre-draft public consultation as the first stage in the preparation of the Bray Municipal District Local Area Plan (LAP) 2025. This submission on the pre-draft public consultation of the Bray Municipal District Local Area Plan (LAP) 2025 has been prepared by the executive and approved the members of the Eastern and Midland Regional Assembly at the meeting of 13th December 2024.

1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the Regional Spatial and Economic Strategy (RSES), is currently provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on 17th October 2024. However, the provisions of the Planning and Development Act 2024 have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

Section 19 of the Planning and Development Act 2000, as amended, requires that a local area plan shall be consistent with any regional spatial and economic strategy that applies to the area of the plan. While the Regional Assembly is not required under Section 27 of the Planning and Development Act 2000, as amended, to prepare a submission and observations on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case the preparation of a draft local area plan for a designated Key Town in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the preparation of the draft Bray Municipal District LAP 2025.

2.0 Regional Spatial and Economic Strategy (RSES)

As indicated in the Assembly's previous submissions to the Local Authority, the Council will be aware of the Regional Spatial and Economic Strategy 2019-2031 (RSES) for the Eastern and Midland Region which was made on 28th June 2019, and is a strategic plan and investment framework to shape future growth throughout the Region.

The Growth Strategy of the RSES identifies Bray as located inside the Dublin Metropolitan Area (and is included in the Metropolitan Area Spatial Plan in Chapter 5 of the RSES) and is identified as a Key Town in Table 4.2 Settlement Hierarchy of the RSES. The role of Key Towns within the RSES are to serve 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. The RSES also identifies Bray as a key node on the North-South (DART) Corridor.

3.0 Submission

The Assembly notes that Wicklow County Council intends to prepare a local area plan for the Bray Municipal District which includes the settlement areas of Bray Town and Environs, Enniskerry, and Kilmacanogue. The duration of the plan will be six years from the date of its adoption. As part of the first stage of this process, the Local Authority has set out a list of key topics to be covered within the local area plan on the online pre-draft consultation document for the LAP, and is now engaging in pre-draft public consultation. It is indicated that the LAP will provide a framework and land use strategy for the future growth of the Bray Municipal District for the benefit of its constituent settlements and its citizens. The Regional Assembly considers that these key topics give a broad overview of the key issues facing the Bray Municipal District that will encourage members of the public and interested parties to engage in the process and to make a submission.

The Assembly welcomes the areas of focus outlined within the key topics namely;

- Housing, Population, Compact Growth
- Regeneration of Communities and Places, Healthy Placemaking, Urban Design, Opportunity Sites
- Economic Opportunity, Tourism, Shops and Services, Community Facilities
- Heritage, Biodiversity, Green Infrastructure, Climate Action, Energy
- Infrastructure, Sustainable Movement, Transportation
- Other Issues

The Assembly considers that these areas of focus align well with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), outlined at Section 2.3 of the RSES and which are also included in the Wicklow County Development Plan 2022-2028. The Regional Assembly further welcomes the recognition in the pre-draft consultation document of the status of Bray as a Key Town and as a Level 2 Major Town Centre in the Retail Strategy for the Region, as detailed in the RSES.

In order to assist the Local Authority in ensuring that the LAP is consistent with the RSES, the following are key areas and Regional Policy Objectives (RPOs) of the RSES, that the Assembly would like to bring attention to in order to inform the preparation of the LAP.

3.1 Housing, Population, Compact Growth

Chapter 3 of the RSES, Growth Strategy, outlines growth enablers for settlements in the Metropolitan Area, including Bray, Enniskerry and Kilmacanogue, and these include:

- To realise ambitious compact growth targets of at least 30% of all new homes to be built, to be within or contiguous to the existing built up area of metropolitan settlements, with a focus on healthy placemaking and improved quality of life;

- Delivery of strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.
- To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and activating strategic sites to strengthen the local employment base in commuter towns.
- Enhance co-ordination across local authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.

Furthermore, the Settlement Strategy contained in Chapter 4 of the RSES identifies Bray as a Metropolitan Key Town in the settlement hierarchy of the Region. In this respect the RSES characterises Bray as a strong active town that provides higher order services, including tertiary education, health, cultural and leisure facilities, is a major retail and shopping destination, and attracts people from the surrounding towns and villages. It acknowledges that while many of the town's residents commute to Dublin, there is potential to provide for significant local employment growth for both its residents and its extensive surrounding catchment. The RSES also acknowledges that Bray is a visitor and tourism destination benefitting from its natural setting on the coast with the backdrop of the Wicklow Mountains.

Chapter 4 of the RSES also provides a regional profile for Bray, highlighting areas of strength and priorities in relation to key regeneration areas and the importance of the completion of the River Dargle Flood Defence Scheme to enhance the potential for future growth in the established town centre and built-up area.

The pre-draft consultation document states that the growth settlements within the Bray Municipal District will need new homes built between now and 2031 and that the focus of growth will be in Bray, with additional growth in Enniskerry and modest growth in Kilmacanogue. The Regional Assembly welcomes this approach which is aligned with the Settlement Strategy in the RSES. The Regional Assembly further welcomes the recognition that in order to facilitate compact growth, 30% of new homes need to be in the existing built-up area and town/village centres, which is aligned with the growth enablers for the Dublin Metropolitan Area. The RSES states that delivery of new mixed-use development at the Bray golf course and harbour lands will provide for consolidation within the established town. Further to this, RPO 4.37 of the RSES supports 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. Furthermore, RPO 4.39 of the RSES is 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.

The pre-draft consultation document further notes that significant lands are zoned at Fassaroe, west of Bray, to accommodate a significant new residential population and employment opportunities in a high-density development surrounding a neighbourhood centre core. It is noted that the strategy for Fassaroe will be reviewed as part of the preparation of the draft LAP.

The RSES recognises that population growth in Bray has been modest compared to other settlements as expansion of the town is constrained by the coast to the east, Bray Head/Sugarloaf mountains to the south and the N/M11 to the west. In order for Bray to fulfil its growth potential, lands at Fassaroe to the west of the N/M11 are targeted for new housing, employment and major community and sports facilities, along with development of lands at Old Connaught, which are within the administrative area of Dún Laoghaire-Rathdown County Council. RPO 4.37 of the RSES further supports 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.

3.2 Regeneration and Healthy Placemaking

Within the pre-draft consultation document, the proposed focus is on the regeneration of the existing built-up areas of Bray, Enniskerry and Kilmacanogue in order to facilitate more vibrant and sustainable communities. This is welcomed by the Regional Assembly. Furthermore, the emphasis on urban regeneration through the redevelopment of under-utilised buildings and vacant sites is also welcomed and will assist in the consolidation of the urban core and the creation of a more compact settlement. As previously referenced, this aligns with RPO 4.39 of the RSES in relation to the regeneration of strategic sites to provide for enhanced town centre functions.

The pre-consultation information document further notes that the local area plan will promote healthy placemaking through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow. This approach is welcomed by the Regional Assembly as it aligns with Healthy Placemaking as one of the three key principles of the RSES, supported by Regional Strategic Outcomes (RSOs) 1-5 in relation to healthy placemaking, and RPOs for healthy communities and creative places.

3.3 Economic Development

It is recognised within the RSES that Bray has a highly concentrated and diversified employment base and provides employment for its residents and surrounding towns as far as Wicklow, Arklow and Gorey. The town is designated as a Level 2 Major Town Centre in Table 6.1 of the RSES, Retail Hierarchy for the Region, and furthermore, due to the presence of Ardmore Film Studios, the town has been at the centre of the Irish Film Industry for 60 years.

The town aims to attract major employment generating investment in the retail, services and industrial sectors with a particular focus on promoting Bray as a destination for high value investment in people-based industries, at accessible locations to public transport. There is also scope for employment growth at Fassaroe to improve the local employment base in Bray.

Within the pre-draft consultation document, the Regional Assembly welcomes the recognition of the importance of protecting the traditional role of the town centre as the primary retailing and business core, while also facilitating its expansion. Reference to Wicklow's Local Economic and Community Plan 2023 -2029 and County Tourism Strategy in the pre-draft consultation document is also welcomed, since these address a wide range of issues around delivering employment and tourism actions, such as encouraging new employers to locate in the county, marketing, training, financial support, etc.

Specifically relating to economic development, and aligned with the Wicklow Local Economic and Community Plan 2023 -2029, which identifies Bray as a strategic employment location, RPO 4.38 of the RSES supports the development of Bray as a strategic employment location with a particular focus on attracting high value investment in 'people' based industries at accessible locations, in order to increase the number of local jobs. Furthermore, Table 5.2 of the RSES highlights the location of Bray on the North-South Corridor (DART) and its potential as a strategic employment development area in the Dublin Metropolitan Area, with employment potential in relation to the re-intensification of commercial town centre functions and new mixed-use district.

In the drafting of the LAP, the Local Authority should note Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management, and consider these elements in its economic policies and objectives for the expansion and growth of economic opportunities within the Key Town. The LAP should also reference that Bray is a Level 2 (Major Town Centre) within Table 6.1 of the RSES, Retail Hierarchy for the Region.

3.4 Biodiversity, Green Infrastructure and Climate Action

The pre-draft consultation document notes that the protection and enhancement of the area's natural and built assets is key to the future development of the settlements in a sustainable manner. It also recognises that the local area plan has a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town. This is welcomed by the Regional Assembly as it is aligned with the key principle of Climate Action, which is one of the three key principles of the RSES, supported by Regional Strategic Outcomes (RSOs) 6-11 in relation to climate action, and RPOs for biodiversity and natural heritage, enhanced green infrastructure, supporting the transition to low carbon and clean energy, building climate resilience, sustainable management of water, waste and other environmental resources, and integrated transport and land use. RPOs 7.22 and 7.23 of the RSES note the importance of the preparation of Green Infrastructure strategies as part of the LAP making process, their linkage to nature conservation measures (including protection of European sites) and supporting the co-ordination of mapping of strategic green infrastructure across the Region. To assist in the preparation of a Green Infrastructure Strategy as part of the LAP plan-making process, the Local Authority should note the guiding principles for the preparation of Green Infrastructure Strategies as set out in Section 7.7 of the RSES.

To enhance knowledge and expertise in this area, the Regional Assembly wishes to highlight that it participated in the EU funded PROGRESS project, with the objective of promoting improved governance for regional ecosystem services. As part of this project, a Pilot Action tested the transfer of a Decision Support Mapping Approach for Ecosystem Services and Green Infrastructure from Catalonia (case study was Dún Laoghaire-Rathdown County Council). Workshops were held with representatives from key stakeholder organisations, including Wicklow County Council. The outputs and learnings from the Pilot Action, including the documented mapping methodology developed with local input from Dún Laoghaire-Rathdown County Council, are available and transferable to other local contexts in the Eastern and Midland Region. In the preparation of a Green Infrastructure Strategy for the draft LAP, Wicklow County Council is welcome to consult with the Regional Assembly on learnings from the above pilot project.

It is further noted in the pre-draft consultation document that the local area plan will also include an emphasis on reduction in energy demand and greenhouse gas emissions. To enhance knowledge and expertise in this area, the Regional Assembly wishes to also highlight that it participated as lead stakeholder on the ESPON QGasSP Targeted Analysis Project which focused on the development and

delivery of a method for quantifying and forecasting the relative Greenhouse Gas impacts of alternative spatial planning policies, with pan-European applicability. Wicklow County Council is welcome to consult with the Regional Assembly on learnings from the above project.

3.5 Sustainable Movement and Transportation

As noted in the pre-draft consultation document, the provision of adequate transport infrastructure is critical to facilitate and sustain growth within the LAP area. As set out in the RSES, being positioned on the North-South Corridor (DART), Bray has access to high quality public transport including DART services and is at the terminus of the proposed Luas Green Line extension, with potential to promote sustainable mobility and achieve the vision of ‘walkable’ communities. The pre-draft consultation document notes that the local area plan will promote sustainable settlement and transport-led development strategies, in particular in relation to the location, layout and design of development.

The Regional Assembly welcomes this approach which supports RPO 4.41 of the RSES which encourages Bray’s 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.

To enhance knowledge and expertise in this area, the Regional Assembly encourages continued engagement by Wicklow County Council with the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA), which is being delivered by the Regional Assembly for the Eastern and Midland Region. The programme aims to support local authorities and stakeholders in the Region to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025. Wicklow County Council is welcome to consult with the Regional Assembly in relation to the SSMA Programme.

The pre-draft consultation document further notes that Enniskerry and Kilmacanogue have limited public transport infrastructure, and in this respect the continued improvement of the local transportation network including the provision of footpaths, cycle lanes, traffic management proposals, etc, are important considerations for incorporation into the draft LAP. The RSES provides the basis for the integration of land use and transport planning in the Region, informing the preparation and implementation of plans, programmes and projects at all levels. The guiding principles for the integration of land use and transport included at Section 8.3 of the RSES can assist Wicklow County Council in addressing these considerations.

Given the necessity to co-ordinate effective land use and transportation planning and the achievement of compact growth, it is advised that a Local Transport Plan is prepared in conjunction with the Local Area Plan, in line with Section 8.3 and RPO 8.6 of the RSES. A Local Transport Plan (LTP) should include the transport priorities for the settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; and road enhancements. The guidance provided in relation to Local Transport Plans in the RSES also suggests that Local Link Offices (Transport Coordination Units) should also be consulted in the development of LTPs. The policies, objectives and measures which emerge from the LTP are required to be incorporated into the local area plan.

The updated Draft Revised National Planning Framework (published November 2024) recognises that Transport Orientated Development (TOD) has the potential to locate a significant proportion of future population, housing, employment, services and amenities along high-capacity transport networks and at transport nodes, helping to ensure compact and sequential patterns of growth. The Regional

Assembly encourages consideration of a TOD approach in the drafting of the LAP and any associated LTP.

In addition, it should be noted that the All-Island Strategic Rail Review, the final report for which was published on the 31st July 2024, aims to decarbonise the island's transport systems, promote sustainable connectivity, enhance regional accessibility, and support balanced development by focusing on the rail network's potential. The Regional Assembly encourages consideration of the strategic options contained in the final report of the All-Ireland Strategic Rail Review in the drafting of the LAP and any associated LTP.

3.6 Enabling Infrastructure

As previously referenced, the westward expansion of the Key Town of Bray will require collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services, in line with RPO 4.37 of the RSES. Short to medium term enabling infrastructure identified in Table 5.1 of the RSES in relation to the strategic development of Bray-Fassaroe include a requirement for high capacity bus services between Bray and Fassaroe, a new distributor road, N/M11 upgrades and a new bridge to Old Connaught. Furthermore, the LUAS extension to Bray is included as long term enabling infrastructure.

Table 8.4 of the RSES identifies planned infrastructure upgrades on the M11 from the M50 to Kilmacanogue as a key infrastructure investment in the Metropolitan Area that is supported by national policy. Investment in such improved strategic road connectivity is supportive of RPO 8.10 of the RSES which makes direct reference to the road projects set out in Table 8.4.

The RSES promotes maximising return on existing and planned infrastructural investments therefore attention is drawn to RPO 10.3 in the RSES which requires the Regional Assembly and local authorities to liaise and cooperate with Uisce Éireann to ensure the delivery of the investment works programme of Uisce Éireann that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies and provide for long term solutions for wastewater treatment for the Region. Waste water upgrades and local and wider area water network and storage upgrades required for the westward expansion of Bray are referenced in Table 5.1 of the RSES. Furthermore, Section 10.2 of the RSES states that the 'Guiding Principles for SuDs' shall be incorporated into LAPs, and the LAP should reference these guiding principles to ensure alignment with the RSES.

3.7 Flood Risk Management

The pre-draft consultation topics indicate that the draft LAP will be informed by the preparation of a Strategic Flood Risk Assessment (SFRA). In line with RPO 7.12 of the RSES, the preparation of an SFRA will be required. In keeping with best practice, it is recommended that the Local Authority take into account the recommendations of the SFRA, while also taking opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES. It is further recommended that the most up-to-date flood mapping should clearly inform the preparation and detail in the LAP.

3.8 Environmental Assessments

As part of the overall process, the LAP will require a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA), which are required under the EU SEA and Habitats Directives. The Regional Assembly recommends early engagement with the relevant bodies in this regard, including

the Office of Public Works, Department of Housing, Local Government and Heritage, the National Parks and Wildlife Service, the Environmental Protection Agency and Uisce Éireann.

4.0 Recommendations and Observations

The Regional Assembly advises Wicklow County Council to pay particular attention to the following issues in the preparation of the Bray Municipal District LAP 2025 in order to ensure consistency with the RSES and makes the following recommendations:

1. The Local Authority should take the growth enablers for settlements within the Metropolitan Area, as outlined in Chapter 3 of the RSES, into consideration in the drafting of the LAP and the LAP should align with RPO 3.1 in relation to the Growth Strategy of the Region.
Reason: To ensure consistency with the RSES.
2. The LAP should ensure that specific policies relating to Bray Key Town, contained within the RSES, are considered as part of the LAP. This includes RPOs 4.37 to 4.41 of the RSES.
Reason: To ensure consistency with the RSES.
3. The LAP should align with RPOs 9.1 and 9.2 in the RSES which relate to a diverse and inclusive region.
Reason: To ensure consistency with the RSES.
4. The LAP should reference Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.
Reason: To ensure consistency with the RSES.
5. Table 6.1 Retail Hierarchy for the Region in the RSES which outlines Bray under Level 2 of the retail hierarchy entitled 'Major Town Centres and County (Principal) Town Centres' should be clearly outlined in the LAP.
Reason: To ensure consistency with the RSES.
6. The LAP should align with RPOs 7.22 and 7.23 of the RSES in relation to Green Infrastructure, and the Local Authority should take the 'Guiding Principles in the Preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES into consideration in the drafting of the LAP.
Reason: To ensure consistency with the RSES.
7. The LAP should reference Figure 7.4 Climate Strategy of the RSES.
Reason: To ensure consistency with the RSES.
8. The Local Authority should take the 'Guiding Principles for the Integration of Land Use and Transport' as set out in Section 8.3 of the RSES into consideration in the drafting of the LAP.
Reason: To ensure consistency with the RSES.

9. The LAP should align with RPO 8.6 in relation to the preparation of a Local Transport Plan for the settlement, and the policies, objectives and measures which emerge from the Local Transport Plan should be incorporated into the LAP.
Reason: To ensure consistency with the RSES.
10. The LAP should reference the 'Guiding Principles for Sustainable Drainage Systems' as set out in Section 10.2 of the RSES.
Reason: To ensure consistency with the RSES.
11. The LAP should align with RPOs 7.12, 7.14 and 7.15 of the RSES regarding flood risk management.
Reason: To ensure consistency with the RSES.

The following are observations by the Regional Assembly that should be taken into consideration in the drafting of the Bray Municipal District LAP in the interest of best practice:

1. The Regional Assembly encourages continued engagement by Wicklow County Council with the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA), which is being delivered by the Regional Assembly for the Eastern and Midland Region. The programme aims to support local authorities and stakeholders in the Region to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025. Wicklow County Council is welcome to consult with the Regional Assembly in relation to the SSMA Programme.
Reason: In the interest of best practice and knowledge sharing.
2. The Regional Assembly wishes to highlight that it participated in the EU funded PROGRESS project, with the objective of promoting improved governance for regional ecosystem services. Wicklow County Council was involved in workshops in relation to the pilot action which tested the transfer of a Decision Support Mapping Approach for Ecosystem Services and Green Infrastructure. The outputs and learnings from the Pilot Action, including the documented mapping methodology developed with local input from Dún Laoghaire-Rathdown County Council, are available and transferable to other local contexts in the Eastern and Midland Region. In the preparation of a Green Infrastructure Strategy for the draft LAP, Wicklow County Council is welcome to consult with the Regional Assembly on learnings from the above pilot project.
Reason: In the interest of best practice and knowledge sharing.
3. The Regional Assembly participated on the ESPON QGasSP Targeted Analysis Project which focused on the development and delivery of a method for quantifying and forecasting the relative Greenhouse Gas impacts of alternative spatial planning policies, with pan-European applicability. Wicklow County Council is welcome to consult with the Regional Assembly on learnings from the above project.
Reason: In the interest of best practice and knowledge sharing.
4. The Regional Assembly encourages consideration of a Transport Oriented Development (TOD) approach in the drafting of the LAP and any associated Local Transport Plan.
Reason: In the interest of integrated transport and land-use planning.

5. The Regional Assembly encourages consideration of the strategic options contained in the final report of the All-Ireland Strategic Rail Review in the drafting of the LAP and any associated Local Transport Plan.

Reason: In the interest of integrated transport and land-use planning.

5.0 Conclusion

The Regional Assembly welcomes the opportunity to participate in the Pre-Draft Consultation for the drafting of the Bray Municipal District LAP 2025 and looks forward to engaging with the Local Authority on the forthcoming stages of the plan-making process, and as part of ongoing engagement activities to progress the implementation of the policies and objectives of the RSES.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
13th December 2024