



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Avonvard Limited (a Park Developments company)
Reference:	BRAYLAP-180716
Submission Made	December 18, 2024 6:11 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please refer to attached submission.

File

23023- Bray MD LAP Pre-Draft Submission FINAL.pdf, 1.22MB

'Bray MD LAP',
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96.

Date: 18th December 2024
JSA Ref: KK 23023

Dear Sir / Madam,

RE: SUBMISSION TO THE PRE-DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN IN RELATION TO A SITE AT VEVAY ROAD AND BOGHALL ROAD (THE FORMER DELL SITE), BRAY, CO. WICKLOW

1.0 INTRODUCTION AND RELEVANT CONTEXT

On behalf of our client, Avonvard Limited (a Park Developments company), [REDACTED] we, John Spain Associates, [REDACTED] wish to make a submission to the Bray Municipal District Local Area Plan Pre-Draft Consultation, which runs until the 18th of December 2024. This submission has regard to the Pre-Draft Consultation Booklet published on the 20th of November 2024.

The subject lands are located at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow. In the Bray Municipal District Local Area Plan 2018, the subject lands were zoned 'MU' Mixed Use development with the stated land use zoning objective '*to provide for mixed use development*', subject to Specific Local Objective 4 (SLO4), which provides for high intensity employment and a residential scheme.

The southern portion of the site is subject to an extant planning permission for an office and nursing development (Phase 1) under WCC Reg. Ref.: 22/823. In respect of the northern portion of the site, An Bord Pleanála (ABP) recently granted planning permission under ABP Ref.: 319474-24 (WCC Reg. Ref.: 24/46) for a Large-scale Housing Development (LRD) for a residential development (Phase 2 development on the overall landholding) comprising 178 no. apartments (with a mix of 78 no. 1 bed apartments, 79 no. 2 bed apartments, and 21 no. 3 bed apartments), and a childcare facility, in 3 no. buildings (Blocks 1, 2 and 3), ranging from 3 to 4 no. storeys in height, over a basement level, and all associated site and infrastructural works.

Due to the mix of uses permitted and the phasing requirements associated with employment use on the lands, as required under SLO 4, it has not been possible for our client to deliver the permitted development to date due to viability issues and the lack of market interest. Accordingly, this submission requests that the new LAP provide a more flexible planning framework in respect to the subject lands, whilst supporting it's redevelopment for a mix of uses, with an emphasis on residential use.

The Pre-Draft Consultation Booklet published by Wicklow County Council to inform the pre-draft LAP process includes relevant key topics pertaining to the development of our client's lands including '*Housing – Population – Compact Growth*'. The Consultation Booklet poses a

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John Spain Associates Ltd. trading as John Spain Associates

series of sample questions under each of these key topics, which are intended to prompt responses from the public to contribute to the preparation of the Draft LAP.

This submission makes several key recommendations, with a view to contributing positively to the preparation of the Draft LAP document which will provide for the sustainable development of the brownfield, underutilised site at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow. The recommendations are summarised briefly below in this section of the submission, while detail in support of each recommendation is provided in Section 4, with relevant site location and context provided in Section 2 and the relevant planning history provided in Section 3.

Summary of Key Recommendations

In the context of the above, and the questions posed in the Consultation Booklet, this submission requests that the Draft Bray Municipal District Local Area Plan include policies, and / or objectives, and supporting text and maps, in relation to the following to ensure that the subject lands can be brought forward for primarily residential development, with supporting ancillary uses, in respect to the brownfield, underutilised, subject site at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow:

Recommendations- Housing – Population – Compact Growth

- Whilst it is acknowledged that the subject lands were zoned for mixed use development, subject to SLO 4 of the 2018 LAP, as set out in Section 3 it is clear that our client has sought to bring forward employment opportunities as part of the Phase 1 development. However, the Phase 1 office and nursing home development has not attracted any interest to date and continues to be a challenge due to the downturn in the commercial office market over the past two years and the location of the subject lands in an area where there is no demand for higher order office accommodation.
- Therefore, having regard to the above and given that the subject site is a suitable location for residential uses, we respectfully request that the lands are zoned 'New Residential', with the objective '*To provide for a new residential development and supporting facilities during the lifetime of the plan*'. This would make efficient use of an underutilised, brownfield site and positively contribute to compact growth in the area, and will positively contribute to an increase in residential units and other supporting facilities (where feasible), in an area with a range of social, commercial, retail and public transport infrastructure.
- Alternatively, should the mixed use zoning be retained in the new LAP, it is respectfully requested that the Specific Local Objective 4 (SLO4) is amended to provide for more flexibility in respect to the quantum and mix of uses to be provided on the subject lands, to better reflect market demands, and to ensure it is not as restrictive in terms of the mix of uses or phasing, in particular in terms of the proportion of employment uses required prior to the housing element being delivered. It is considered that the requirements for the site should be similar to that for 'Opportunity Sites' in the 2018 LAP, which gives more flexibility and ensures that development potential of the subject lands which form a brownfield, underutilised, site could be maximised.
- For example, we suggest the following revised text for SLO 4 (changes shown in red):

*This site was formerly occupied by computer company Dell and has been vacant for some years. The site ~~is~~ **was formerly** occupied by a large manufacturing building and surrounding grounds and car parking, measuring c. 3.75 ha. While there is a demand*

for additional housing in Bray, it is not considered appropriate that any and every vacant employment site should be considered for solely residential redevelopment as it is not sustainable to only deliver significant new housing at the expense of employment opportunities.

Given that this site is surrounded by both residential and employment uses, it is considered that a mixed, high intensity employment and **high density** residential scheme, **with other supporting facilities (where feasible)** would be suitable on these lands, in accordance with the following criteria:

- **Lands zoned MU may be developed for a range of uses, including (but not limited) residential, employment, community facilities, nursing homes, childcare, health centres, office and retail use, and with flexibility provided on the quantum and mix of uses provided to ensure a viable format of development can be brought forward on this underutilised and brownfield site;**
- **The development shall be delivered in a higher density format ~~and in particular, shall have a plot ratio of not less than 1:1~~. Development of up to 4 storeys may be considered on the western and southern parts of the site, with heights on the northern and eastern parts of the site being more consistent with and respecting the existing amenity of existing residential areas surrounding the site. Increased building height will be considered where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) or any subsequent height guidelines;**
- **~~The employment element shall be in a high employment intensity format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1 plot ratio, a total employment floor space yield of at least 20,000sqm is desired;~~**
- **~~A nursing home and / or health care facility will be considered subject to such use not comprising more than 50% of the employment floorspace requirement on site and being delivered in conjunction with the remaining employment elements;~~**
- **~~The Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sqm)~~**
- **~~Any planning 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, comprising not more than 50% of the total housing programme, 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 employment element.~~**

2.0 **SITE LOCATION AND CONTEXT**

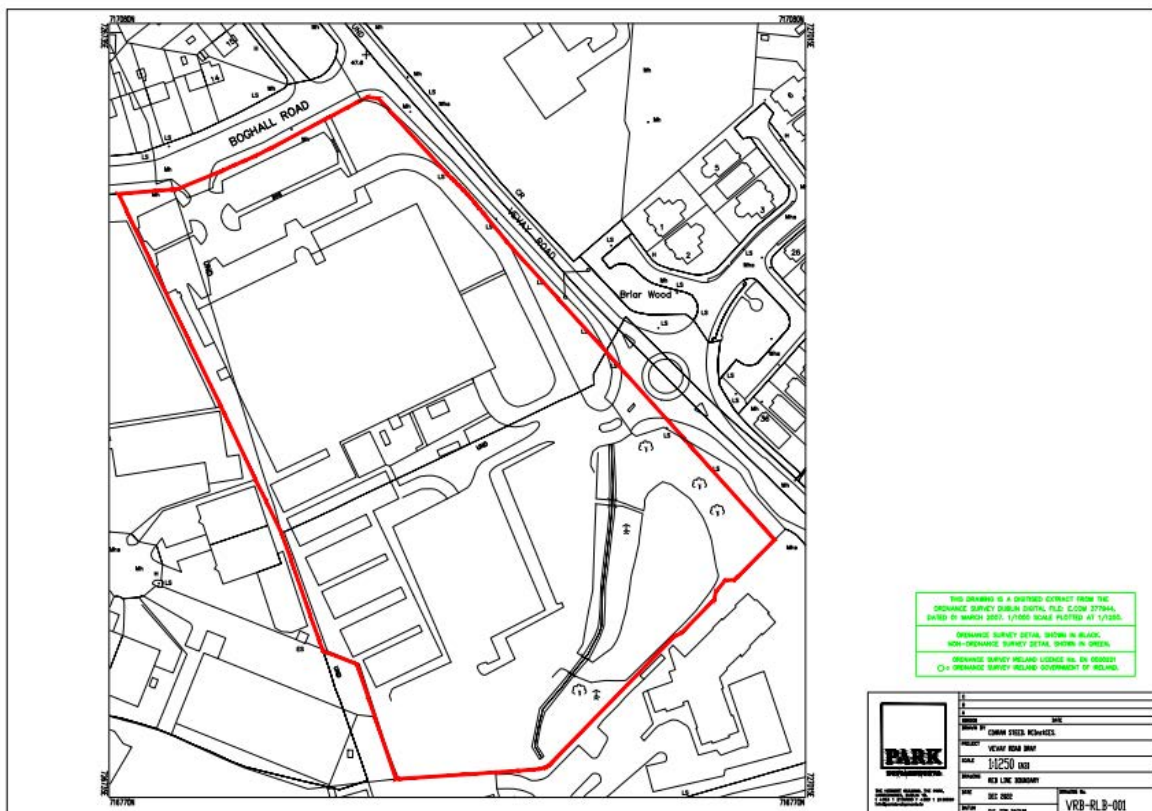
Our client's lands are located within the boundary of the LAP and comprise the former Dell site is located to the south of Boghall Road and west of Vevay Road and has an overall area of c. 3.75 hectares (See Figure 2.1). It was formerly occupied by the former Dell factory which was derelict since the early 2000's following the closure of the Dell factory. The existing building was recently demolished due to the deteriorating condition of the existing building and to address health and safety concerns associated with the existing structure on the site (as permitted under Reg. Ref.: 23/60043). Access to the site is currently provided via Boghall Road and Vevay Road.

The subject site is located north of the Wilton Hotel, Bray, and northwest of Bray Golf Club. Bray is the largest town in County Wicklow and is the principal service centre for the north of the county. The town is connected to Dublin by the DART rail system, mainline railway, bus services, and M11/N11.

The surrounding context is characterised by a series of 2 storey semi-detached residential properties, open space areas and a range of commercial, hotel, warehouse, retail warehouse and industrial units. This includes Chadwicks, a builders providers located to the north west. RH Packaging comprises a factory/warehouse unit located to the west of the subject site, and Heat Merchants is located to the south west. Existing residential properties are located on Boghall Road to the north (including Scott Park and Roselawn Park), Briar Wood Estate to the east and Riddlesford Estate to the south west; an existing school, St Andrew's National School is located to the east and an existing hotel and office block is located at the intersection of R761 to the south.

In addition to the immediately adjoining employment, commercial, community and residential uses, the subject site is very well placed in terms of proximity to local amenities within walking and cycling distance. The subject site is in close proximity to a number of schools and neighbourhood centres. St. Andrew's National School is located to the north east of the subject site and Scoil Chualann further north of the subject site, along with Presentation College and Loreto Secondary School. It is also conveniently located close to an Aldi supermarket approximately 350m to the west. There are a number of leisure facilities also in close proximity, including Bray Golf Club, County Wicklow Lawn Tennis Club, and Shoreline Leisure.

Figure 2.1: OS Map with extent of land ownership outlined in red



The lands were zoned in the 2018 LAP for 'MU' Mixed Use development with the stated land use zoning objective '*to provide for mixed use development*', subject to Specific Local

Objective 4 (SLO4), which provides for high intensity employment and a residential scheme, stating the following:

“This site was formerly occupied by computer company Dell and has been vacant for some years. The site is occupied by a large manufacturing building and surrounding grounds and car parking, measuring c. 3.75 ha. While there is a demand for additional housing in Bray, it is not considered appropriate that any and every vacant employment site should be considered for solely residential redevelopment as it is not sustainable to only deliver significant new housing at the expense of employment opportunities.

Given that this site is surrounded by both residential and employment uses, it is considered that a mixed, high intensity employment and residential scheme would be suitable on these lands, in accordance with the following criteria:

- *The development shall be delivered a high density format and in particular, shall have a plot ratio of not less than 1:1. Development of up to 4 storeys may be considered on the western and southern parts of the site, with heights on the northern and eastern parts of the site being more consistent with and respecting the existing amenity of existing residential areas surrounding the site;*
- *The employment element shall be in a high employment intensity format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1 plot ratio, a total employment floor space yield of at least 20,000sqm is desired;*
- *A nursing home and / or health care facility will be considered subject to such use not comprising more than 50% of the employment floorspace requirement on site and being delivered in conjunction with the remaining employment elements;*
- *Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sqm)*
- *Any planning 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, comprising not more than 50% of the total housing programme, 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 employment element.”*

As outlined in Section 3 below, permission has been granted for subject lands, including Phase 1 office and nursing home development on the southern portion of the lands and Phase 2 in respect of an LRD development on the northern part of the landholding. The Masterplan submitted with the LRD development includes for a future Phase 3 employment development for the remainder of the lands to satisfy the overall requirement identified for employment generating uses in accordance with the provisions of SLO 4 of the LAP. However, as set out below, the Phase 1 office and nursing home development has not attracted any interest to date.

It is submitted that the lands are ideally positioned within the settlement of Bray, and within the LAP boundary, to contribute to the delivery of sustainable residential development within the LAP area in the short-term. It is considered providing flexibility on the delivery of development on the overall site would allow the redevelopment of this vacant site to come to fruition, which fully accords with numerous Government policies and objectives in respect to residential development.

3.0 **PLANNING HISTORY**

The following provides an overview of the relevant planning history for the subject lands.

WCC Reg. Ref.: 24/46 and ABP Ref.: 319474-24- Large-Scale Residential Development (Phase 2 of overall development on the former Dell site)

On the 26th of July 2024, an Order to grant permission, subject to 24 no. conditions, was issued by An Bord Pleanála for a Large-scale Residential development on the northern portion of the subject site. This upheld a notification decision to grant permission by Wicklow County Council. The development was described as follows in the public notices:

“The proposed Large-scale Residential Development includes the demolition of the existing vacant manufacturing building on site, all associated site clearance and enabling works, and the construction of a residential development (Phase 2 development on the overall landholding) comprising 178 no. apartments (with a mix of 78 no. 1 bed apartments, 79 no. 2 bed apartments, and 21 no. 3 bed apartments), and a childcare facility, in 3 no. buildings (Blocks 1, 2 and 3), ranging from 3 to 4 no. storeys in height, over a basement level, and all associated site and infrastructural works.

The detailed description of the development is as follows:

- *Demolition of the existing vacant manufacturing building on the site and associated site clearance and enabling works;*
- *Block 1 contains 29 no. apartments, including 16 no. 1 bed, 10 no. 2 bed, and 3 no. 3 bed apartments in a three storey building partially over a basement level. Balconies / private terraces are provided for all apartments on the western and eastern elevations. Block 1 includes a childcare facility with a Gross Floor Area (GFA) of 427.6 sq.m at ground floor level and associated play area for the childcare facility;*
- *Block 2 contains 57 no. apartments, including 20 no. 1 bed, 29 no. 2 bed, and 8 no. 3 bed apartments in a three storey building over a basement level. Balconies / private terraces are provided for all apartments on the north-east, north-west, south-east and south-west elevations;*
- *Block 3 contains 92 no. apartments, including 42 no. 1 bed, 40 no. 2 bed, and 10 no. 3 bed apartments in a four storey building partially over a basement level. Balconies / private terraces are provided for all apartments on the north-east, north-west, south-east and south-west elevations;*
- *155 no. car parking spaces and 311 no. cycle parking spaces for the residential units are provided at basement level, and secure allocated storage space is provided at basement level for the residential units. 23 no. car parking spaces, 111 no. cycle parking spaces, and a set down area are provided at surface level to serve the residential units and childcare facility;*
- *Vehicular access will be via the existing access from Vevay Road and via a new vehicular access from Boghall Road, and the proposal includes associated internal road infrastructure, which provides pedestrian, cyclist and vehicular access to the basement level. The proposed development includes associated improvements to Vevay Road and Boghall Road to facilitate the proposed development (which includes alterations to the existing footpaths / public road);*
- *The proposed development includes public open space, communal open space, boundary treatments, hard and soft landscaping, bin stores, an ESB substation and cycle lift, external fire escape cores, plant rooms, green roofs, and PV panels at roof level. The associated site and infrastructural works include provision of utilities and associated civil works, foul and surface water drainage and public lighting, along with all associated ancillary development.”*

As illustrated in Figure 3.1 the LRD residential development relates to the northern part of the landholding, with the remainder allocated to employment generating uses in accordance with the requirements of SLO 4, as illustrated in Figure 3.2.

Figure 3.1: TOTA Proposed Phase 2 Site Plan



Phasing and Masterplan

The application documentation submitted with the LRD application, includes a TOTA Masterplan and Phasing Statement, outlining how the Phase 2 residential development in conjunction with the permitted Phase 1 development (WCC Reg. Ref.: 22/823) and a future Phase 3 office application could satisfy the overall requirements of the Mixed Use zoning and the associated SLO 4 map based objective in the Bray Municipal District LAP 2018 (See Figure 3.2).

As part of the Phase 1 planning application for the southern portion of the site, a masterplan was submitted indicating a potential residential and office scheme on the northern portion of the landholding as a Phase 2 development which would be fully consistent with the SLO 4 criteria. Since this time, the proposals have evolved.

The revised masterplan and phasing proposals submitted with the LRD application demonstrated how the proposals could deliver on the requirements of SLO 4 and provide for a mixed use employment and residential redevelopment of the overall lands, which required the employment element to be the predominant use as part of the overall redevelopment of the lands.

Table 3.1: Phasing Indicated as part of Reg. Ref.: 24/46 and ABP Ref.: 319474-24)

	Key Supporting Infrastructure / Development
Phase 1 (Permitted Development granted under Reg. Ref.: 22/823)	<ul style="list-style-type: none"> • Nursing Home (8,666 sq.m) • Office Building (3,354 sq.m) • Provision of associated landscaping and site services
Phase 2a (Permitted Development granted under Reg. Ref.: 24/46 and ABP Ref.: 319474-24)	<ul style="list-style-type: none"> • Demolition of existing building • Blocks 1 and 2 (86 no. residential units) and associated communal open space • Childcare facility (Block 1) • Infrastructure and vehicular access to Boghall Road • Access to basement level and associated basement parking and surface parking to serve Phase 2a • Provision of public open space • Provision of associated landscaping and site services
Phase 2b (Permitted Development granted under Reg. Ref.: 24/46 and ABP Ref.: 319474-24)	<ul style="list-style-type: none"> • Blocks 3 (92 no. residential units) and associated communal open space • Associated basement parking and surface parking to serve Phase 2b • Infrastructure and vehicular access to Boghall Road • Provision of associated landscaping and site services
Phase 3 (Future Application)	<ul style="list-style-type: none"> • 2 no. commercial office buildings • Associated basement parking and surface parking to serve Phase 3 • All associated landscaping, site works and infrastructure.

Condition No. 2 of the Board Order relates to phasing and states that the phasing shall accord with the Phasing and Implementation Strategy, the TTA and the Landscape & Biodiversity Design Statement, subject to Phase 1 (permitted nursing home and office) being commenced in conjunction with Phase 2(b), unless otherwise agreed in writing with the Planning Authority.

This condition was considered necessary to comply with the provisions of SLO 4, notwithstanding that the delivery of Phase 2A and 2B concurrently is more practical from a construction and viability perspective, and therefore we request the new LAP to provide greater flexibility to allow for the redevelopment of this site to come forward. It will also deliver an element of commercial floorspace on the site in the form of the childcare facility. The requirement under Condition 2 could result in no development being delivered on the site in the short-term as it will be difficult to secure funding for commencement of the residential element, where it can only be part delivered due to uncertainty in relation to delivery of Phase 1.

Figure 3.2: TOTA Proposed Masterplan

WCC Reg. Ref.: 22/823 – Phase 1 Nursing Home and Office Building

A final grant of permission was issued by WCC on the 20th of October 2022, subject to 17 no. conditions for a revised Phase 1 office and nursing development, on the southern part of the subject lands. This application was brought forward to improve the commercial viability of the Phase 1 application for employment uses on the subject lands.

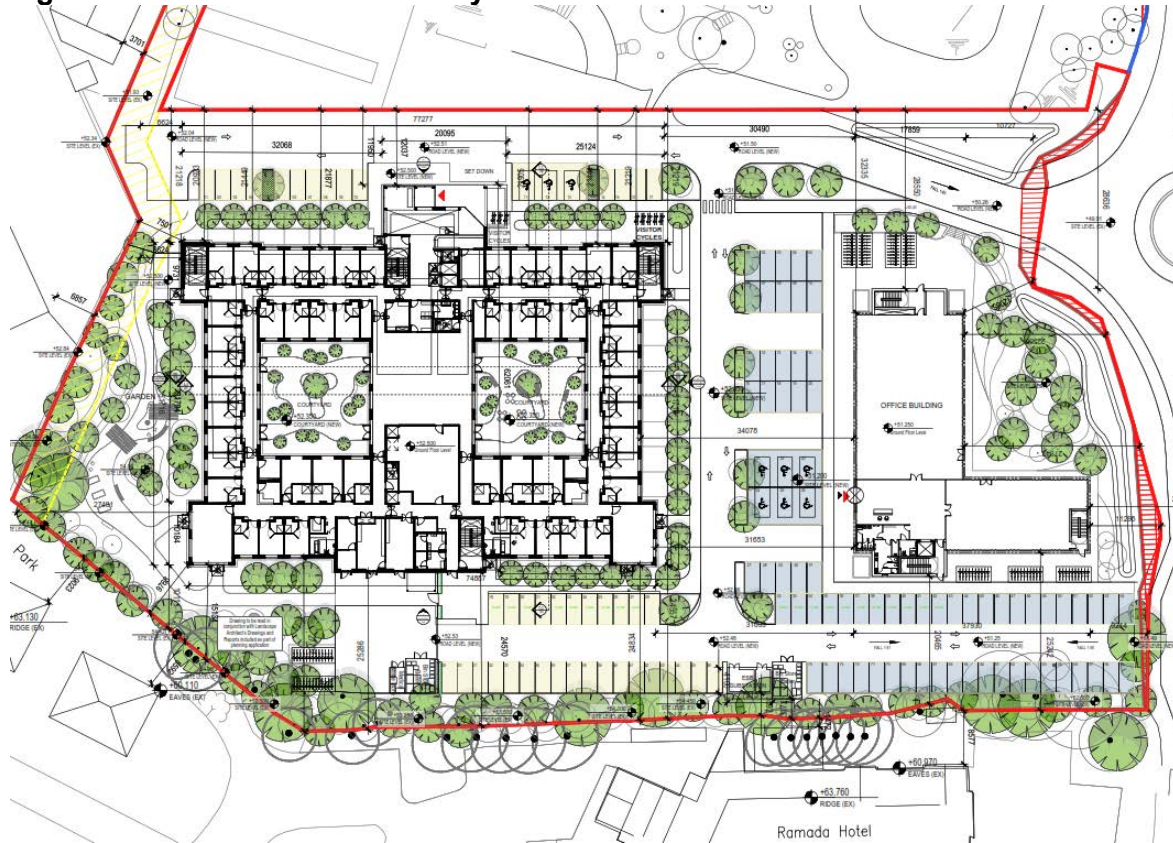
The key changes proposed from the original grant of planning permission, under WCC Reg. Ref.: 18/1181 / ABP Ref.: 304425-19 (referenced below), related to a reduction in the number of bed spaces / floor area in the Nursing Home (including a reduction in height from 4 no. to 3 no. storeys), removal of the basement, revised parking, and all associated site and infrastructural works.

The part three storey, part four-storey office building, with plant area at roof level, retained the same building design and layout as the permitted scheme, under Reg. Ref.: 18/1181 and ABP Ref.: 304425-19.

The proposed changes to the previously permitted development reflected the specific requirements of the nursing home sector, which has significantly changed over the intervening years, with the scale of the original proposal not in line with current best practice for new nursing homes in Ireland and proving to be problematic in respect to the commercial viability of the development in this location. The omission of the basement was necessary to ensure the viability of the scheme and to kickstart the redevelopment of the overall site.

Since this time, the Phase 1 office and nursing home development has not attracted any interest to date. This is primarily due to viability issues and the lack of market interest in the office floorspace in this location. Park Developments are continuing to try and attract a nursing home operator and office occupier (this is very challenging due to the downturn in the commercial office market over the past two years, with even centrally located office schemes struggling to stack-up commercially).

Figure 3.3: TOTA Phase 1 Site Layout Plan



Source: TOTA Architectural Drawings

WCC Reg. Ref.: 18/1181 and ABP Ref.: 304425-19 – Phase 1 Nursing Home and Office Building

On the 24th of October 2019, an Order to grant permission, subject to 18 no. conditions, was issued by An Bord Pleanála for the Phase 1 office and nursing development, on the southern part of the subject lands. The Board's Order to grant permission followed from the Planning Authority's notification to grant permission, which was subject to first party and third party appeals.

WCC Reg. Ref.: 23/60043 – Demolition of Existing Building

Wicklow County Council issued a final grant of permission on the 17th of August 2023 for the demolition of the existing vacant manufacturing building on the site, erection of temporary boundary fencing and gates, and all associated site works in relation to the site at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow.

This separate application was brought forward due to the deteriorating condition of the existing building and to address health and safety concerns associated with the existing structure on the site. It also allows for the clearing of the site to make way for a new high-quality mixed use

development in accordance with the Mixed Use / SLO 4 objectives relating to the site (completing the demolition of the existing building separate from the Phase 2 redevelopment proposals will remove the need for this stage (c. 16 weeks) as part of any future redevelopment construction programme). This has now been implemented and the existing building has been demolished.

4.0 SUBMISSION REQUESTS

Having regard to the foregoing site context and planning history, this section of this document sets out the submission requests which were summarised in the introduction / executive summary of this submission. The following points relate to the relevant heading provided within the pre-draft consultation booklet for the 2025 LAP and are related back to the information contained within the consultation booklet and the sample questions posed therein wherever relevant.

Housing – Population – Compact Growth

The first key topic of the consultation booklet relates to ‘*Housing – Population – Compact Growth*’ and identifies that the growth settlements within the Municipal District will need new homes built between now and 2031, with the focus of growth in Bray.

Under this topic, the following sample questions are provided, however it notes all ideas are welcome:

- *Where in Bray and Enniskerry should higher densities be located? How do we deliver higher densities?*
- *Where do we deliver our new housing in Bray and Enniskerry without contributing to urban sprawl?*
- *What brownfield sites in the centres of the settlements could be redeveloped to maximise opportunities?*
- *Where are the vacant or underutilised sites in the settlements? How can the plan maximise use of these sites?*
- *What should be the extent and type of development planned for Fassaroe?*

In the context of the foregoing, we highlight that our client’s lands are zoned for mixed use development (including residential) under the 2018 LAP, and that the principle of a residential development on the northern portion of the subject lands is supported by ABP and the Planning Authority, at the density of 97 uph and building height of up to 4 no. storeys as permitted under the LRD application (under Reg. Ref.: 24/46 and ABP Ref.: 319474-24).

It is considered given the brownfield nature of the site, the proximity to a range of existing services, and the proximity to good quality public transport infrastructure that the southern portion of the subject lands is appropriate for residential development and supporting facilities with similar heights and densities. Applying the permitted density of 97 uph across the entire landholding area of 3.75 ha would provide for a total residential provision of c. 360 units.

However, it is noted that subject site would be appropriate for other supporting uses, but at a reduced quantum than required under the current SLO 4 objective, where feasible, including nursing home, childcare facility, medical facility, office / retail and so on. Therefore, whilst it is considered that the lands are ideally positioned within the LAP boundary and can contribute to the delivery of sustainable residential development within the LAP area in the short-term, it is considered that providing flexibility on the delivery and type of development on the overall site would allow the redevelopment of this vacant site to come to fruition.

In particular, the subject site is well serviced by existing bus routes in close proximity to the site, with 2 no. bus stops on Vevay Road within 60-100m, and in addition to the immediately adjoining employment, commercial, community and residential uses, the subject lands are very well placed in terms of proximity to local amenities within walking and cycling distance.

Whilst it is acknowledged that the subject lands were zoned for mixed use development, subject to SLO 4 of the 2018 LAP, stating *'While there is a demand for additional housing in Bray, it is not considered appropriate that any and every vacant employment site should be considered for solely residential redevelopment as it is not sustainable to only deliver significant new housing at the expense of employment opportunities.'* As set out in Section 3, it is clear that our client has sought to bring forward employment opportunities as part of the Phase 1 development. However, the Phase 1 office and nursing home development has not attracted any interest to date. This is primarily due to viability issues and the lack of market interest in the office floorspace in this location. Park Developments are continuing to try and attract a nursing home operator and office occupier, however this is very challenging due to the downturn in the commercial office market over the past two years, with even centrally located office schemes struggling to stack-up commercially.

Therefore, having regard to the above and that the subject site is a suitable location for residential, we respectfully request that the lands are zoned 'New Residential' with the objective *'To provide for a new residential development and supporting facilities during the lifetime of the plan'*. This would make efficient use of an underutilised, brownfield site and positively contribute to compact growth in the area, and will positively contribute to an increase in residential units and other supporting facilities (where feasible) in an area with a range of social, commercial, retail and public transport infrastructure.

This is considered appropriate having regard with national and regional policy, including the National Planning Framework (NPF) which sets out the importance of development within existing urban areas by *"making better use of under-utilised land including 'infill' and 'brownfield' and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport"*. This is also reflected in the NPF Objective 35 which states to *"increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights"*. The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 also supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs (noting Bray is located within the 'Dublin City and Metropolitan Area' and is described as a 'key town' within the RSES).

The identification of additional residential lands is considered appropriate given recent Housing Commission and ESRI reports demonstrate that housing demand is a minimum of 50,000 homes per annum. The Draft Revised NPF provides for an increase in the national population growth from 5.8m to 6.1m by 2040. It outlines a national requirement for 50,000 homes to be completed per year to satisfy demand. This is also in line with the ESRI projections.

Alternatively, should the mixed use zoning be retained, it is respectfully requested that the Specific Local Objective 4 (SLO4) is amended to provide for more flexibility, reflecting the market demands, and ensure it is not as prescriptive in terms of the mix of uses or phasing, in particular in terms of the proportion of employment uses required, prior to the housing element being delivered. It is considered that the requirements for the site should provide for more flexibility and ensures that development potential of the subject lands which form a brownfield, underutilised site could be maximised. For example, we suggest the following

revised text for SLO 4, which reflects a more recent policy position by the Planning Authority for a mixed use zoned site in the Draft Blessington LAP 2025:

*“This site was formerly occupied by computer company Dell and has been vacant for some years. The site ~~is~~ **was formerly** occupied by a large manufacturing building and surrounding grounds and car parking, measuring c. 3.75 ha. While there is a demand for additional housing in Bray, it is not considered appropriate that any and every vacant employment site should be considered for solely residential redevelopment as it is not sustainable to only deliver significant new housing at the expense of employment opportunities.*

*Given that this site is surrounded by both residential and employment uses, it is considered that a mixed, high intensity employment and **high density** residential scheme, **with other supporting facilities (where feasible)** would be suitable on these lands, in accordance with the following criteria:*

- **Lands zoned MU may be developed for a range of uses, including (but not limited) residential, employment, community facilities, nursing homes, childcare, health centres, office and retail use, and with flexibility provided on the quantum and mix of uses provided to ensure a viable format of development can be brought forward on this underutilised and brownfield site;***
- **The development shall be delivered in a ~~higher~~ density format ~~and in particular, shall have a plot ratio of not less than 1:1~~. Development of up to 4 storeys may be considered on the western and southern parts of the site, with heights on the northern and eastern parts of the site being more consistent with and respecting the existing amenity of existing residential areas surrounding the site. **Increased building height will be considered where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) or any subsequent height guidelines;*****
- ~~The employment element shall be in a high employment intensity format and low density manufacturing / warehousing will not be considered; on the basis of achievement of a 1:1 plot ratio, a total employment floor space yield of at least 20,000sqm is desired;~~*
- ~~A nursing home and / or health care facility will be considered subject to such use not comprising more than 50% of the employment floorspace requirement on site and being delivered in conjunction with the remaining employment elements;~~*
- ~~The Not more than 40% of total floor space shall be devoted to residential use; depending on the range of unit sizes and formats, at least 150 units is desired (c. 15,000sqm)~~*
- ~~Any planning 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, comprising not more than 50% of the total housing programme, 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 employment element.”~~*

In summary, our recommendations in response to the questions addressed in the first key topic of the consultation booklet relates to ‘Housing – Population – Compact Growth’ are as follows:

- Whilst it is acknowledged that the subject lands were zoned for mixed use development, subject to SLO 4 of the 2018 LAP, as set out in Section 3 it is clear that our client has sought to bring forward employment opportunities as part of the Phase 1 development. However, the Phase 1 office and nursing home development has not attracted any interest to date and continues to be a challenge due to the downturn in

the commercial office market over the past two years and the location of the subject lands in an area where there is no demand for higher order office accommodation.

- Therefore, we respectfully request that the lands are zoned ‘*New Residential*’, with the objective ‘*To provide for a new residential development and supporting facilities during the lifetime of the plan*’. This would make efficient use of an underutilised, brownfield site and positively contribute to compact growth in the area, and will positively contribute to an increase in residential units and other supporting facilities (where feasible), in an area with a range of social, commercial, retail and public transport infrastructure.
- Alternatively, should the mixed use zoning be retained in the new LAP, it is respectfully requested that the Specific Local Objective 4 (SLO4) is amended to provide for more flexibility in respect to the quantum and mix of uses to be provided on the subject lands, to better reflect market demands, and to ensure it is not as restrictive in terms of the mix of uses or phasing, in particular in terms of the proportion of employment uses required prior to the housing element being delivered. It is considered that the requirements for the site should be similar to that for ‘Opportunity Sites’ in the 2018 LAP, which gives more flexibility and ensures that development potential of the subject lands which form a brownfield, underutilised, site could be maximised.

5.0 **CONCLUSION**

This submission on the Bray Municipal District Local Area Plan Pre-Draft Consultation, has been prepared by John Spain Associates on behalf of Avonvard Limited (a Park Developments company), owners of lands within the boundary of the Bray Municipal District Local Area Plan 2025. This submission requests that the Draft Bray Municipal District Local Area Plan include policies, and / or objectives, and supporting text and maps, in relation to the following to ensure that the subject lands can be brought forward for primarily residential development, with supporting ancillary uses, in respect to the brownfield, underutilised, subject site at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow.

As has been set out above, the subject site as an underutilised, brownfield site presents an important opportunity to deliver much-needed residential development and it is submitted that the Draft Bray Municipal District Local Area Plan 2025 should provide an appropriate and flexible planning framework for the delivery of same.

We respectfully request that the recommendations set out within this submission are considered when preparing the Draft Bray Municipal District Local Area Plan 2025.

We would be pleased to discuss this submission or the lands to which it relates, should the Council have any queries.

Yours sincerely,



John Spain Associates