

	<h1>Variation No.6</h1>
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Who are you:	Agent
Name:	John Spain Associates on behalf of Avonvard Limited (a Park Developments company)
Reference:	VAR6-163221
Submission Made	January 16, 2026 4:34 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Chapter 3 – Proposed Variation No. 6

Write your observations here:

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23023- Vevay RD Submission to CDP Var. No. 6 Final.pdf, 0.82MB

Variation No. 6,
Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town,
A67 FW96.

Date: 16th January 2026
JSA Ref.: KK 23023

Dear Sir / Madam,

RE: SUBMISSION TO THE PROPOSED VARIATION NO. 6 TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022–2028 IN RELATION TO LANDS AT VEVAY ROAD AND BOGHALL ROAD (THE FORMER DELL SITE) BRAY, CO. WICKLOW

1.0 INTRODUCTION

On behalf of our client, Avonvard Limited (a Park Developments company), Fourth Floor, The Herbert Building, The Park, Carrickmines, Dublin 18, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission in respect of the Proposed Variation No. 6 to the Wicklow County Development Plan (CDP) 2022–2028 (as varied), in relation to the lands in their ownership at Vevay Road and Boghall Road, the former Dell Site, Bray, Co. Wicklow. The consultation period runs from the 5th of December 2025 to the 16th of January 2026.

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. We note that work commenced in 2024 on the review of the Bray Municipal District (MD) Local Area Plan (LAP) and the preparation of the new plan, with the pre-draft public consultation concluding on the 18th of December 2024.

This submission identifies the following key submission requests:

1) Revised Housing Targets – It is considered there should be clearer articulation of how the revised housing growth figures have been derived for the County, including how the “additional provision” envisaged under Policy and Objective 2 of the Housing Growth Guidelines has been applied. In short, it is respectfully submitted that the housing requirement should be increased to ensure it fully reflects the Housing Growth Guidelines (including the full 50% Additional Provision). To meet this, it is considered that WCC need to allocate a minimum additional provision of c. 3,806 no. units to the settlements from that indicated in Table 3.5 of the Proposed Variation, including Bray.

2) Allocation of Additional Growth to Bray – Having regard to the above, it is considered that the allocation for Bray should be increased to assist in meeting the Housing Growth Guidelines requirements in full. In particular, additional growth can be accommodated in Bray given its designation as a Key Town, its position on high-capacity public transport corridors, and its identification within the Regional Spatial and Economic Strategy (RSES) for the

Eastern and Midlands Region and the Dublin Metropolitan Spatial Plan (MASP), as a location requiring a strategic site to support additional housing delivery over the short term.

Section 3.1 of the Housing Growth Guidelines is clear that as part of the variation process, a review of the adequacy of existing zoned lands to cater for the Housing Growth Requirement figures should be assessed, with a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan. This process hasn't been carried out to inform the Proposed Variation.

Whilst there is a separate 'call for sites' process ongoing, it is considered that the Planning Authority should be considering options to bridge any delivery gap as part of the Proposed Variation, along with supporting objectives to release relevant lands to deliver housing in the short term and a key mechanism would be the incorporation the land use zoning map for Bray into the County Development Plan, updated to reflect the increased housing growth requirements, via this proposed variation to the CDP. In this regard it is considered that Bray has capacity to provide for additional growth in the short to medium term, including at our client's brownfield lands at Vevay Road and Boghall Road, Bray.

3) Rezoning request of lands to 'New Residential' – Our client's lands at Vevay Road and Boghall Road were zoned for mixed use development (including residential) under the 2018 LAP, and a residential development on the northern portion of the subject lands has been granted by ACP and the Planning Authority, at a density of 97 uph and building height of up to 4 no. storeys as permitted under the LRD application Reg. Ref.: 24/46 and ACP Ref.: 319474-24.

However, the key constraint to unlocking the redevelopment of this 'Mixed Use' zoned site is the requirements of Specific Local Objective 4 (SLO4) which requires a significant provision of high intensity employment uses on the site if residential development is to be delivered. As set out in Section 3 describing the site's planning history, it is clear that our client has made efforts to address the employment requirements of the site and secured a Phase 1 development for office and nursing home use, however, these proposals have not attracted any potential occupiers / tenants and remain undelivered. This is primarily due to viability challenges around building new nursing homes 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 viability challenges around new nursing homes and the downturn in the commercial office market in recent years following on from the Covid-19 Pandemic, with even centrally located office schemes struggling to stack-up commercially.

Due to the phasing restrictions contained within SLO 4 of the LAP, particularly the mechanism intended to "kick-start" development by limiting the initial delivery of the residential element to 50%, with the remaining 50% only permitted in tandem with employment phase, have significantly undermined the overall viability of the site. As a result, the applicant has been unable to secure funding to facilitate delivery of the permitted Phase 2 LRD scheme, as only half of the residential element can proceed prior to the unviable Phase 1 employment development. In this regard, the Phase 1 office and nursing home component has failed to attract any market interest to date.

Furthermore, we also note that the restrictive nature of the phasing requirements would likely reduce the saleability of units, due to the prospect of a piece-meal and partially delivered residential scheme, which would materially reduce the residential amenity and further undermine attractiveness and delivery of the residential scheme. The phasing would result in additional costs which again have a knock on impact on viability.

It is considered given the brownfield nature of the site, the proximity to a range of existing services, and 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 to the northern LRD proposal. 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.

Therefore, having regard to the above and that the subject site is a suitable location for residential development across the entirety of the site, we respectfully request the incorporation the land use zoning map for Bray into the County Development Plan, updated to reflect the increased housing growth requirements, via this proposed variation to the CDP, and request a specific objective is included within the Proposed Variation which identifies that the lands are integrated into the future area plan to facilitate the delivery of housing, and should be 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 high-capacity public transport infrastructure.

2.0 RELEVANT CONTEXT

2.1 Site Location and Context

Our client's lands are located within the boundary of the Bray Municipal District LAP (2018-2024) 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 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, which amended a previous permission seeking to address viability issues, however, the revisions were not sufficient to make the scheme viable / attract occupiers / tenants. In respect of the northern portion of the site, An Coimisiún Pleanála (ACP) granted planning permission under ACP 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. See Figure 2.1 which illustrates the permitted Masterplan for the site.

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.

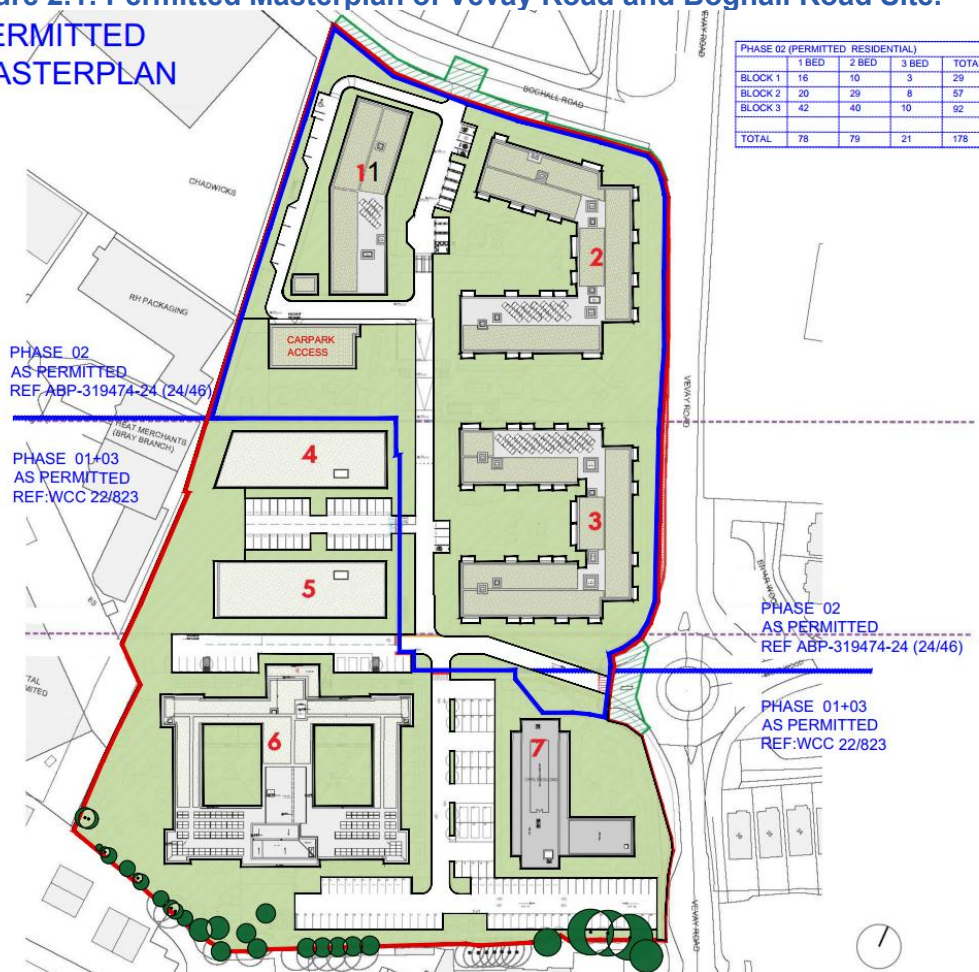
The surrounding context is characterised by a series of 2 storey semi-detached residential properties, open space areas and a range of commercial, hotel, warehouse, retail warehouse and industrial units. This includes Chadwicks, a builders providers located to the north west.

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: Permitted Masterplan of Vevay Road and Boghall Road Site.

PERMITTED MASTERPLAN



Source: OMP Architects – Masterplan

2.2 Planning Policy Context – Bray Municipal District Local Area Plan

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 on the subject lands, including a Phase 1 office and nursing home development on the southern portion of the lands and a Phase 2 LRD residential 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 by suitable operators. In addition to this, the viability of the granted LRD scheme on the northern portion of the lands has also faced challenges due to the stringent nature of the SLO 4 phasing criteria. This submission seeks to highlight that the parameters set out under SLO 4 are unduly restrictive and are, in practice, preventing development from coming forward on these lands. Each land-use component within the site is subject to specific development parameters which, collectively, have impeded overall delivery to date.

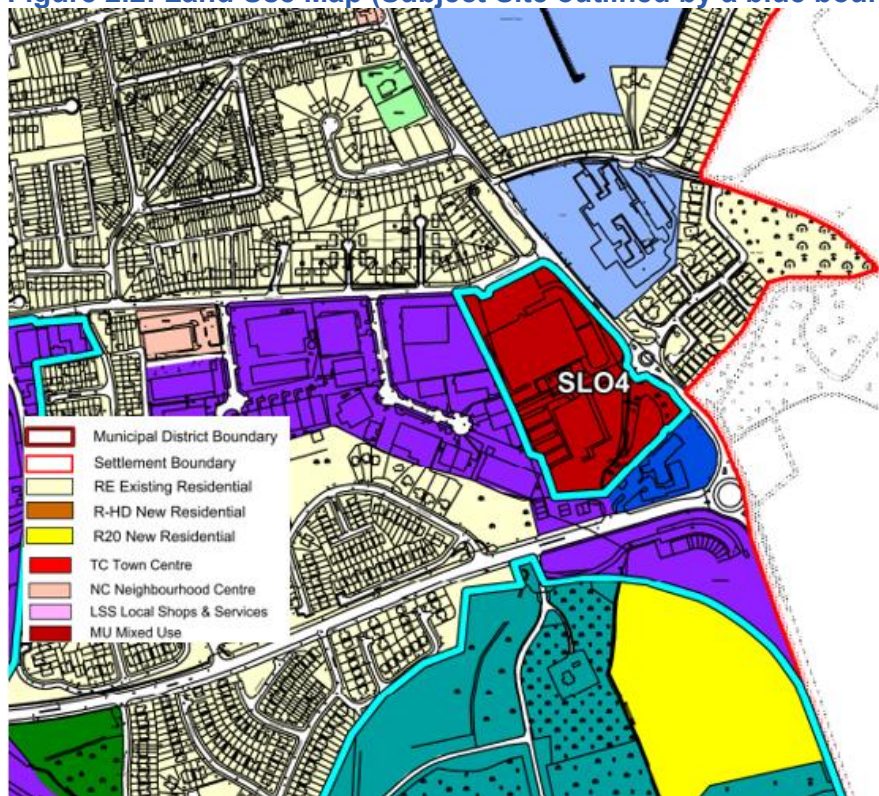
Firstly, the high-intensity employment component of SLO 4 specifies a desired minimum floorspace of 20,000 sq. m. As previously noted, this requirement has not attracted market interest to date, largely due to the sustained downturn in the commercial office sector following the Covid-19 pandemic. This is evidenced by the widespread vacancy of commercial office space across the Dublin MASP.

Secondly, the nursing home component of SLO 4 has been actively pursued by our client, with planning permission granted under Reg. Ref. 22/823. Notwithstanding this approval, implementation has yet to proceed, as no suitable operator interest has materialised to date.

Thirdly, the requirement that only 50% of the residential component may be commenced upon 'kick-starting' the construction of the scheme, with development then paused pending the commencement of the office / employment element, is particularly onerous. This sequencing restriction has materially hindered development and viability of development on the site, makes funding particularly difficult to secure, as demonstrated by the existence of extant but unimplemented planning permissions.

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.

Figure 2.2: Land Use Map (Subject Site outlined by a blue boundary).



Source: Bray MD LAP 2018-2024

By way of background, our client previously participated proactively in the Council's pre-draft public consultation in December 2024 on the Bray Municipal District (MD) LAP 2025. The submission at that time expressed similar concerns in relation to the viability of the proposed Mixed Use development having regard to SLO4 and its associated phasing strategy and requested the rezoning of the lands to 'New Residential', or 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.

3.0 PLANNING HISTORY

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

WCC Reg. Ref.: 24/46 and ACP 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 Coimisiún 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 2.1 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.

Phasing and Masterplan

The application documentation submitted with the LRD application, includes a 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 2.2).

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 ACP 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 ACP 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 ACP 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 Commission 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. As mentioned above, 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.

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 / ACP 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 ACP 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 since Covid, with even centrally located office schemes struggling to stack-up commercially).

WCC Reg. Ref.: 18/1181 and ACP 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 Coimisiún 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, planning history, and in the context of the NPF Implementation Guidelines and revised housing targets for Wicklow, this section of this document sets out the submission requests which were summarised in the introduction / executive summary of this submission.

4.1 Revised Housing Targets

Table 3.1 of Proposed Variation No. 6 sets out revised housing targets for the overall county, identifying a requirement for 7,238 units for the period Q1 2025 to Q2 2028 and 14,476 units for the period Q1 2025 to Q4 2031. These figures accord with the Housing Growth Guidelines, which establish an updated growth benchmark of approximately 2,068 dwellings per annum for County Wicklow to 2034 and a longer-term target of 26,666 units to 2040.

Section 28 Ministerial Guidelines on the Housing Growth Requirements indicates that, as part of a development plan variation, planning authorities should review the adequacy, serviceability and deliverability of existing zoned lands in order to respond effectively to updated housing growth requirements, including the need to maintain an appropriate level of flexibility in land supply over a longer horizon. In this regard, Policy and Objective 2 of the Housing Growth Guidelines, envisage an “additional provision” of up to 50% over and above the baseline housing growth requirement. While it appears that Wicklow County Council has included a level of additional provision within the Proposed Variation No. 6, the basis and quantum of this allowance is not clearly set out in the Variation documentation.

It is considered that the housing target should be increased to provide for the full 50% additional provision consistent with the Housing Growth Guidelines. This would result in an increased housing growth target of c. 21,714 no. units in total for the period 2025 to 2031 (this is based on 14,476 no. units as per Table 3.1 + 50%). In short and based on the information available, WCC would need to allocate an additional c. 3,806 no. units to the settlements from that indicated in Table 3.5 of the Proposed Variation.

In this context, it is respectfully submitted that the housing requirement should be increased to ensure it fully reflects the Housing Growth Guidelines (including the full 50% Additional Provision).

4.2 Allocation of Additional Growth to Bray

Bray is the largest settlement in County Wicklow, and its designation as a Key Town, its location on high-capacity public transport corridors, and its identification within the Dublin MASP all reinforce its strategic role in the metropolitan area. Having regard to this context, it is considered that the allocation for Bray should be increased to assist in meeting the Housing Growth Guidelines requirements in full.

Table 3.3 of the Proposed Variation sets out that due to the geographical constraints that it is considered Bray is only suitable for 50% growth rate in the short to medium term. Table 3.5 of the Proposed Variation then sets out a revised housing target of 5,526 units for Bray for the period 2025–2031, indicating that 62 hectares of zoned land is required, and that 101 hectares is available. However, it is not clear how these figures have been derived.

Section 3.1 of the Housing Growth Guidelines is clear that, as part of the variation process, a review of the adequacy of existing zoned lands to cater for the Housing Growth Requirement figures should be assessed, with a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan. This assessment should take into account factors including the planning history of zoned lands and activation of sites, and the availability of or potential for servicing. Where the planning authority considers that lands may not come forward for development within the remaining period of the existing plan, it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term.

It is acknowledged that the Proposed Variation No. 6 outlines Core Strategy Objectives for the immediate delivery of housing. For example, we recognise Core Strategy Objective 1 states that all lands zoned for residential or mixed use which residential use forms a component will be supported for the delivery, and Core Strategy Objective 2 states the Planning Authority will support the commencement and delivery of permitted housing and assist in the unblocking of impediments where feasible. However, it is not considered these objectives go far enough as they do not specifically address where sites are restricted by a specific local objective (such as SLO4).

Whilst there is a separate ‘call for sites’ process ongoing, it is considered that the Planning Authority should be considering options to bridge any delivery gap as part of the Proposed Variation, with supporting specific objectives to release the relevant lands to deliver housing in the short term and a key mechanism to assist with same would be the incorporation the land use zoning map for Bray into the County Development Plan, updated to reflect the increased housing growth requirements, via this proposed variation to the CDP. In this regard it is considered that Bray has capacity to provide for additional growth in the short to medium term, including at our client’s brownfield lands at Vevay Road and Boghall Road, Bray.

Linked with this, it is requested that WCC incorporate the zoning map for Bray into the Development Plan as part of the variation to ensure there is no unnecessary delay to the delivery of housing. This is to provide further certainty noting the recent decision by An Coimisiún Pleanála stating the LAP has expired and there is no statutory zoning for Bray as a result.

4.3 Rezoning request of lands to ‘New Residential’ to support viability of the Site.

Our client’s lands were zoned for mixed use development (including residential) under the 2018 LAP, and the principle of a residential development on the northern portion of the subject lands is supported by ACP 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. 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

The approved Phase 2 LRD scheme on the northern portion of the site, granted under Reg. Ref.: 24/46 and ACP Ref.: 319474-24, is for 178 no. units, associated communal open space along with a childcare facility. Subject to removal of SLO 4 and amending the land use zoning objective from 'Mixed-Use' to 'New Residential', as part of including the Bray Land Use Zoning map into the CDP as part of this variation, this submission demonstrates that the site has capacity to deliver an additional 122 no. units in Phases 1 and 3. Furthermore, the removal of SLO 4 Objective would allow for a the removal of viability constraints and for a sustainable residential scheme to be brought forward in a time of urgent housing need.

We refer to Figure 4.1 below which demonstrates the subject lands can achieve an overall density of c. 80 uph across the entire landholding area of 3.75 ha, which would provide for a total residential provision of c. 300 units. This achieves a varied unit type, with a mix of apartments, duplex apartments and housing, in addition to other supporting uses where relevant (e.g. childcare facility). This remains consistent with the principles established under the permitted LRD and is consistent with the Compact Settlement Guidelines 2024, which is also reflected in the Proposed Table 6.1 of the Proposed Variation and identifies a density range of 35dph-50dph, with up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.

Figure 4.1: Indicative Proposed Masterplan for Vevay Road and Boghall Road Site.



Source: OMP Architects – Indicative Proposed Masterplan

Whilst the subject site would be appropriate for other supporting uses (as mentioned above), this is at a reduced quantum than required under the LAP SLO 4 objective. As outlined in Section 2.2 above, the parameters indicated for SLO 4 are restrictive by nature, and even with extant planning permissions granted for both the Phase 1 and Phase 2 components of the wider masterplan, the phasing mechanisms indicated are preventing a viable scheme being delivered, and therefore runs contrary to Government Guidelines and initiatives to unlock residential development, deliver housing, particularly on brownfield sites and in locations that support compact growth, such as the subject site. 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.

As set out in Section 3 describing the site's planning history, 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 viability challenges around new nursing homes and the downturn in the commercial office market in recent years following on from the Covid-19 Pandemic, 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 a specific objective is included within the Proposed Variation which identifies that the lands are integrated into the future Local Area Plan to facilitate the delivery of housing, and should be 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 First Revision (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 National Policy Objective 7 which states '*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth*', and National Policy Objective 45 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, increased building height and more compact forms of development*". The RSES 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).

We note this is also reflected in the OPR Submission on the Pre-Draft Bray Municipal District Local Area Plan 2025 which highlights the importance of the reuse of brownfield sites. As stated in the OPR Submission, both the NPF and RSES have policies in favour of the reactivation and regeneration of derelict brownfield sites (specifically noting NPO 4, NPO 6, NPO 18a, NPO18b and NPO 35). Furthermore, as noted by the OPR, the reuse of brownfield sites in urban areas positively contribute to making towns attractive, liveable, and contributing

to climate change mitigation. The Proposed Variation No. 6 of the WCDP provides an opportunity to include a strong policy framework to support the utilisation of brownfield/infill sites and underutilised sites, and as noted above it is requested the incorporation the land use zoning map for Bray into the County Development Plan, updated to reflect the increased housing growth requirements, and specific objectives to release lands via this proposed variation to the CDP,

Alternatively and notwithstanding the appropriateness of the subject site to be rezoned to 'New Residential', if for any reason the Mixed Use Zoning is to be retained, it is respectfully that the SLO 4 is omitted from the site to provide for more flexibility, reflecting the market demands, as the onerous criteria of SLO 4 is stifling the prospect of development on the former Dell Site. This is to 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. As noted throughout this submission, the current criteria of SLO 4 is preventing development being brought forward on the lands due to the resulting impacts on viability and securing funding to bring forward development where employment uses are unviable. 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.

To conclude, we note our client has the capability and willingness to bring the lands forward for residential development in the short term and to reactive this long-term derelict brownfield site at a time of housing need. However, this requires the land use zoning to be changed to Residential, or at the very least for the SLO 4 requirement to be removed from the Mixed Use zoning.

5.0 CONCLUSION

This submission has been prepared by John Spain Associates on behalf of our client, Avonvard Limited (a Park Developments company), owners of the land within the boundary of Bray Municipal Local Area Plan 2018. Our client welcomes the opportunity to make this submission on the Proposed Variation No. 6 to the Wicklow County Development Plan (CDP) 2022–2028 (as varied).

This submission requests that the Proposed Variation No. 6 amends the texts relating to core strategy figures as to fully reflect the Housing Growth Guidelines, including the full 50% additional provision, and that an increased share of this growth is directed to Bray having regard to its status as a designated Key Town within the Dublin MASP. It is further requested that the Bray land use zoning map be incorporated into the County Development Plan through this variation, updated to reflect the increased housing requirements. This is requested along with the rezoning of our client's lands from 'Mixed-Use' to 'New Residential' to enable the subject lands to be brought forward for primarily residential development, with supporting ancillary uses at Vevay Road and Boghall Road (the former Dell site), Bray, Co. Wicklow.

These amendments are necessary to ensure that this well-located brownfield and underutilised site can be redeveloped primarily for residential use. As noted in this submission, the reactivation of brownfield sites in towns is supported by both national and regional policies, which supports compact growth, urban regeneration and the delivery of housing at a time of urgent need.

It is respectfully requested that the Planning Authority have regard to the points raised in this submission to ensure that an appropriate and flexible planning framework is set out for the sustainable future development on our client's lands, enabling their timely redevelopment and contributing positively to meeting Wicklow's housing needs and the sustainable development of Bray and the wider county.

Yours faithfully,

A handwritten signature in black ink, appearing to read "John Spain".

John Spain Associates