



# Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Benduff Ireland Ltd.
Reference:	BRAYLAP-122825
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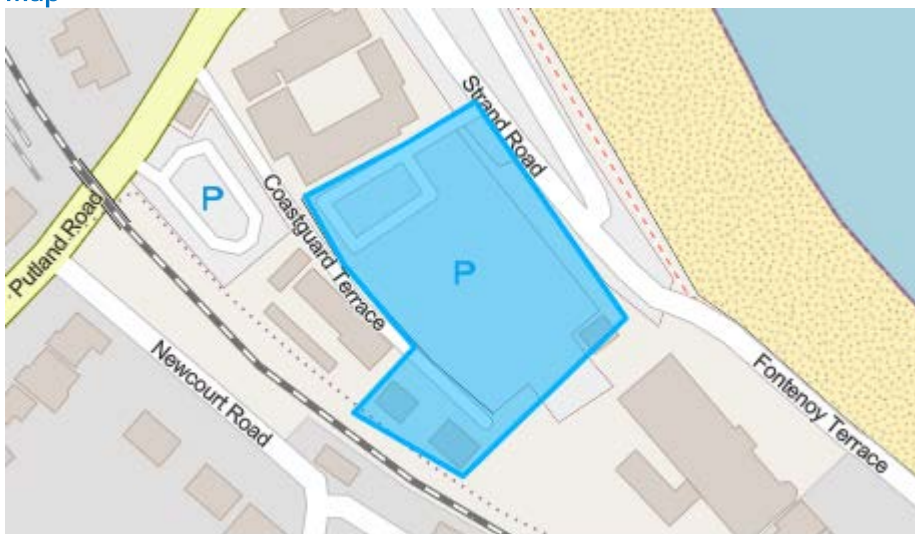
## Topic

Compact Growth - Housing – Population Growth

## Submission

Please see attached report.

## Map



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## Site Description:

Bray Waterfront, Strand Road, Bray, Co. Wicklow

## File

FINAL Pre-Planning Report - Bray Waterfront\_111224LK.pdf, 4.09MB

FINAL Pre Planning Form No 18 - Bray Waterfront\_111224LK.pdf, 0.21MB

Bray Waterfront S247 Booklet Rev A \_1\_-1-8.pdf, 8.42MB

Bray Waterfront S247 Booklet Rev A \_1\_-9-12.pdf, 6.52MB

Bray Waterfront S247 Booklet Rev A\_1\_-13-19.pdf, 7.21MB

FINAL - Bray Waterfront LAP Submission\_181224LK.pdf, 2.88MB



## Form of request to a planning authority to enter into consultations in relation to a proposed Large-scale Residential Development

### BEFORE FILLING OUT THIS FORM PLEASE NOTE THE FOLLOWING

You are referred to the information requirements in Article 5 of the Planning and Development (Large Scale Residential Development 2021), and you should be satisfied that the information accompanying any Pre Planning Request with respect to Section 32B of the Planning and Development Act 2000 (as amended), and Article 16 of the P&D Regulations 2001 (as amended) have been fulfilled. **Where the site has particular constraints they should be identified clearly in the submission.**

Failure to complete this form or attach the necessary documentation or the submission of incorrect information or omission of required information, will lead to the planning authority refusing to deal with your request. Therefore, ensure that **each** section of this request form is fully completed and signed, entering n/a (not applicable) where appropriate, and that all necessary documentation is attached to the request form.

### HOLDING OF PRE-APPLICATION CONSULTATIONS WITH THE PLANNING AUTHORITY

Under section 32E of the Planning and Development Act 2000, as amended, neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

### DATA PROTECTION

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Request for formal pre-application consultation or LRD meeting with **Wicklow County Council** regarding the proposed development of a

### Large-scale Residential Development

<b>1) Prospective Applicant's Name:</b>	Benduff Ireland Ltd
-----------------------------------------	---------------------


<b>2) Request for Section 247 Consultation or LRD meeting</b>			
<input checked="checked" type="checkbox"/>	<b>Section 247 Consultation</b>	<input type="checkbox"/>	<b>LRD Meeting (Section 32B)</b>
<b>Section 247 Consultation Reference:</b>			
A request for an LRD meeting can only be requested once a Section 247 Consultation is complete.			

<b>3) Contact details of person authorised to operate on behalf of the Prospective Applicant (Applicant or Agent): (not for Public release)</b>	
<b>Name:</b>	Hughes Planning & Development Consultants C/O Louise Kennedy and Muireann Coughlan
<b>Correspondence Address:</b>	Hughes Planning & Development Consultants, 85 Merrion Square, Dublin 2, D02 FX60
<b>Telephone:</b>	+353 (0)1 539 0710
<b>Email:</b>	hughesplanning@hpdc.ie

<b>4) Declaration:</b>
I hereby declare that, to the best of my knowledge and belief, the information given in this form is correct and accurate and fully compliant with the Planning and Development Act 2000, as amended, and the Regulations made thereunder.





<b>5) Signature of person authorised to operate on behalf of the Prospective Applicant:</b>	
	
<b>Date:</b>	11 <sup>th</sup> December 2024

<b>6) Applicant's legal interest in the site:</b>		
A) Owner <input checked="" type="checkbox"/>	B) Occupier <input type="checkbox"/>	C) Other <input type="checkbox"/>
<b>If not the owner of site:</b>		
Name and Address of Owner:	N/A applicant is site owner	

<b>7) Formal Request:</b>
<p>In accordance with sections 32B and 247 of the Planning and Development Act 2000, as amended, and article 16A of the Planning and Development Regulations 2001, as amended, <b>Benduff Ireland Ltd</b> formally requests to enter into a Section 247 consultation/LRD meeting with <b>Wicklow County Council</b> regarding the development of a Large-scale Residential Development of <b>103</b> residential units at <b>Site at Bray Waterfront, Strand Road, Bray, Co. Wicklow.</b></p>

<b>8) Information to be included where relevant, with an LRD Meeting Request under section 32B of the Planning and Development Act 2000, as amended and article 16A of the Planning and Development Regulations 2001, as amended.</b>			
<b>6 hard copies and 1 soft copy of all documents to be submitted with Pre Planning</b>			
Information	Enclosed with Request		
A site location map sufficient to identify the land on which the proposed development would be situated	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>	
A brief description of the nature and purpose of the proposed development and of its possible effects on the environment	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>	
A draft layout plan of the proposed development	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>	



A brief description of any proposals to provide for water services infrastructure, including, in the case where it is proposed to connect the proposed development to a public water or wastewater network or both, evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant network or networks have the capacity to service the proposed development	Yes: [ ]	No: [ X ]	N/A: [ ]
Details of any consultations that have taken place with prescribed bodies or the public	Yes: [ ]	No: [ ]	N/A: [ X ]
Such other information, drawings or representations as the prospective LRD applicant may wish to provide or make available.	Yes: [ X ]	No: [ ]	N/A: [ ]
A statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan or local area plan in whose area or areas the proposed LRD would be situated.	Yes: [ X ]	No: [ ]	
A brief description of the proposed numbers and types of houses or numbers of student accommodation units and bedspaces, or both, as appropriate, and their design, including proposed gross floor spaces, internal floor areas and principle dimensions, housing density, plot ratio, site coverage, building heights, proposed layout and aspect	Yes: [ X ]	No: [ ]	
A brief description of proposed public and private open space provision, landscaping, play facilities, pedestrian permeability, vehicular access and parking provision, where relevant	Yes: [ X ]	No: [ ]	N/A: [ ]
A brief description of the proposed provision of ancillary services, where required, including child care facilities	Yes: [ X ]	No: [ ]	N/A: [ ]
Where relevant, any other proposed use in the development, the zoning of which facilitates such use, including the proposed gross floor space for each such use	Yes: [ ]	No: [ X ]	N/A: [ ]
A brief description of any proposals to address or, where relevant, integrate the proposed development with surrounding land uses	Yes: [ ]	No: [ X ]	N/A: [ ]



A description of the capacity of existing or planned infrastructure to serve the proposed development, of the impact of the proposed development on existing/planned infrastructure and of any proposals to provide for other services infrastructure (including cabling such as broadband provision) and any phasing proposal	Yes: [ ]	No: [ X ]	N/A: [ ]
A brief description of proposals under Part V of the Planning and Development Act 2000, where relevant	Yes: [ X ]	No: [ ]	N/A: [ ]
Details of protected structures, national monuments or other monuments included in the Record of Monuments and Places, where relevant	Yes: [ ]	No: [ X ]	N/A: [ ]
Details of traffic and transport assessment where relevant and of traffic, cycle and pedestrian safety	Yes: [ ]	No: [ X ]	N/A: [ ]
Details relating to residential amenity including the assessment of sunlight, daylight, shadow, overlooking and overbearance, where relevant; for existing properties and proposed residential unit	Yes: [ ]	No: [ X ]	N/A: [ ]
Flood risk, risk of major accident and ecological impacts	Yes: [ ]	No: [ X ]	N/A: [ ]
Landowner consent	Yes: [ ]	No: [ X ]	N/A: [ ]
The appropriate fee	Yes: [ ]	No: [ X ]	N/A

<b>Planning Authority Official Use only:</b>	
<b>9) Planning Reference:</b>	
<b>Planning Authority Stamp:</b>	



**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

# PRE-PLANNING REPORT

## RESIDENTIAL DEVELOPMENT

Site at Bray Waterfront, Strand Road, Bray, Co. Wicklow

DECEMBER 2024

SUBMITTED IN DECEMBER 2024 ON BEHALF OF:

**Benduff Ireland Ltd**

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## 1.0 Introduction

Hughes planning and Development Consultants, [REDACTED] have prepared this planning report for inclusion as part of a formal request to Wicklow County Council on behalf of our client, Benduff Ireland Ltd, for a Section 247 Consultation in respect of a development proposal for a Site at Bray Waterfront, Strand Road, Bray, Co. Wicklow. The preliminary description of the proposed development is as follows:

*i) construction of a residential development of 103 no. units comprising 27 no. one-bedroom apartments, 62 no. two-bedroom apartments and 14 no. three-bedroom apartments contained within 2 no. blocks comprising 1 no. 5-7 storey block including recessed Penthouse on Strand Road, containing 81 apartments, with an undercroft Car Park, Retail and Crèche facilities located on Ground Floor and a 3-4 storey apartment block including recessed penthouse on coastguard terrace containing 22 apartments; (ii) provision 1 no. vehicular entrance to undercroft car park accessed along Strand Road with associated internal access road network with pedestrian and cyclist infrastructure, and 2 no. pedestrian access along Coastguard Terrace via terraced podium and along Strand Road; (iii) provision of a creche facility with external play area; and, (iv) all ancillary site and infrastructural works, provision of landscaped communal open space and public open space, general landscaping, boundary treatments, public lighting, surface/undercroft parking spaces (80 no. spaces), foul/surface water drainage and attenuation areas, as necessary to facilitate the proposed development. The residential units will have shared access to adjoining bin stores, car parking and bicycle parking bays. Each residential unit will be provided with private amenity space in the form of a balcony or terrace.*

The key statistics of the subject proposal are also outlined in the below table for ease of reference:

Key Development Statistics	
Site Area	Total Site Area = 0.56 hectares
Total No. Residential Units	Apartment Units 103 no.
Total No. One Bedroom Units	27 no.
Total No. Two Bedroom Units	62 no.
Total No. Three Bedroom Units	14 no.
Retail/Creche	840 sq.m
Communal Open Space	1680 sq.m
Public Open Space	880sq.m (15.7%)
Car Parking Provision	80 no. car parking spaces (0.8 per unit)
Density	183.9 UPH
Plot Ratio	With Undercroft - 2.48 Without Undercroft - 2.03

This report provides an overview of the site indicating our client's concept for development and includes extracts of relevant drawings prepared by MCORM Architecture & Urban Design. This report sets out the planning rationale and justification for the proposed alterations, including a detailed assessment of the application site and proposal in the context of the requirements of the Wicklow County Development Plan 2022-2028 and all relevant national planning policy.

## 2.0 Site Location and Description

The Site, located on the Bray Waterfront comprises of approximately 0.594 ha (1.468 acres). There is an extensive change in level across the site. The Site slopes from the Newcourt Road/train route towards the north-east. The Site is predominantly home to a paying car-park and there are currently 3 residential units to the rear.





Figure 1.0 Image showing the subject site outlined in red.

The Site adjoins 'Star Leisure & Casino' to the north and 'Bray Head Hotel,' a Protected Structure, to the south. Bray Head Hotel is currently undergoing renovation works with a large 5 storey extension to the rear. The Site enjoys an uninterrupted view of the Irish Sea to the east, albeit separated by significant rows of on-street public parking spaces. Coastguard Cottages; a terrace of two-storey dwellings is located to the west and are significantly elevated above the Site. These cottages are accessed via an unsurfaced laneway off Putland Road. The Dublin-Wexford and DART railway line is also located to the south of the Site.

The Site presents itself as a redevelopment opportunity due to the accessibility of a variety of cafés, bars, restaurants, shops, schools and the Bray Institute of Further Education.

The Site has access to a number of public transport routes. Bray Daly Station is situated 1km from the Site and provides a high-frequency connection into the city centre, north Dublin, Louth and Wexford. Bray Bus Depot lies 800m from the Site and provides connections to the wider Dublin area and beyond.





Figure 2.0 3D image of subject site (red outline).



Figure 3.0 Image showing the locational context of the subject site (outlined in red).





Figure 4.0 Street view image of the subject site from the north-east (Strand Road).



Figure 5.0 Wider locational context of subject site (red star).

### 3.0 Planning History

This section provides an overview of the planning history for the subject landholding.

#### 3.1 Subject Site

##### Reg. Ref. 23786

Planning permission was granted on 12<sup>th</sup> February 2024 for a surface carpark as constructed, under Planning Reg. Ref. 12630002, accommodating a total of 136 no. carparking spaces of which 6 no. are accessible spaces; 19 no. bicycle stands to accommodate 38 bicycles; use as a venue for occasional outdoor amusement, carnival and festival space on a hard landscaped surface; portable cabin for storage and night time security; together with associated siteworks for a temporary period of 5 years.

##### Reg. Ref. 17/359

Planning permission was sought on 3<sup>rd</sup> April 2017 for a new commercial and residential development comprising of the demolition of the existing residential buildings to the rear of the site and the creation of 106 no. residential apartments (12 no. 3 beds, 71 no. 2 beds and 23 no. 1 beds), childcare facility, 5 no. commercial units (1894sqm) and car parking facilities at basement, ground and mezzanine floor levels. Access for both the commercial and residential uses would be via the main entrance on Strand Road whilst creche

setdown and emergency vehicles would access via the existing laneway from Putland Road.

The development was originally refused by Wicklow County Council on 26<sup>th</sup> May 2017 but was subsequently approved by An Bord Pleanála on 14<sup>th</sup> November 2017 under ABP Ref. 248754. Although the development was refused by Wicklow County Council, the Planners Report (dated 22<sup>nd</sup> May 2017), included the following positive commentary which would be important to note in respect of the subject proposal:

*'The Council will consider permitting developments comprising modern, innovative designs, where the character and setting of historically important buildings is not compromised.'*

*'The Housing section had 'No objections to Part V proposals.'*

*'The proposal; to provide a residential apartment development, which includes 5 retail units and a creche, is considered to accord with the zoning objectives, and are therefore acceptable in principle.'*

*'Accordingly the development would meet 1 : Bray Town Plan which allows for a Maximum site coverage of 65%.'*

*'The plot ratio is considered to be acceptable and well below the max permissible plot ratio for the seafront area.'*

*'The development of 10,525sqm would meet with the density standards of the Wicklow County Development Plan which allows for 12,000sqm of development on the site.'*

*'The proposed apartment development is a modern building with an overall ground to ridge height of 24m over basement parking. This section of Bray seafront consists of a mix of modern commercial buildings, a hotel and Victorian houses with varying building heights from 4 storey to single storey buildings. Therefore a modern design would be considered acceptable in principle.'*

*'Communal/Public open space is proposed in the form of a central courtyard of 928sqm which is in excess of the minimum requirement of 15% of the site area for public open space.'*

*'The overall parking requirements of the development are 213 spaces and the total number proposed is 226 spaces. Therefore the parking proposals are adequate to meet with CDP standards.'*

*'The proposed development would result in the loss of an existing car park which has been in place on a temporary basis for the past 5 years. This car park was only ever proposed as a temporary measure and therefore the loss of these parking spaces is considered to be acceptable.'*

The Planners Report (dated 22<sup>nd</sup> May 2017), included the following negative commentary which would be important to note in respect of the subject proposal:

*'All major development proposals for the seafront area should incorporate a material element of commercial use that serves to both bolster and broaden the attractiveness of the area for locals and tourists alike.'*

*'Correspondingly, in recognition of the traditional use of the seafront for commercial and leisure uses, proposals for residential development must include specific noise insulation proposals at the planning application stage.'*

**Response:** It is considered that the proposed residential development would be in accordance with the above standards.

*'The Reports from Iarnród Éireann stated that they 'strongly object to the proposed excavations which would impact on the stability of the railway line, Object to apartments facing the railway line.'*

**Response:** It is considered that the proposed residential development would ensure the stability of the railway line. The applicant has reached out to Iarnród Éireann intend to Liaise with them throughout the planning process.

*Municipal District Engineer has 'Concerns re potential flooding, unsuitable car park entry level, proposed excavation works with no slope stability analysis or constructions method and no consideration to potential impact to ground water. Proposal is serious risk to residential property and the rail transport link. Loss of on street parking and car park and increase in parking demands will lead to traffic congestion in the area.'*

**Response:** A detailed Flood Risk and Justification Report will be prepared by Gordon White Consulting Engineers. This will be provided at a later date in the planning process.

*'Having regard to the existing protected structure on the adjacent site, together with the location of the site, identified as an opportunity site for a 'landmark building which will help set the tone for the town, and influence the public perception of it, a high quality of urban design and innovative architectural design solutions will be sought' It is considered that the design of building is not high quality urban design, it does not complement the existing Victorian seafront setting and would not be appropriate in this area. The relationship between the proposed building and the Bray Head Hotel which is a protected structure, is not clear, While it is not suggested that the applicants attempt to mimic the existing protected structure, it is considered that a better attempt could have been made to design the proposed development to-be sympathetic to the protected structure and the overall architecture of bray seafront which is home to a large number of protected buildings of significant character.'*

**Response:** It is considered that the proposed residential development has been designed to be sensitive to the Bray Head Hotel which is a protected structure. We note that since this application, the Bray Head Hotel has been granted a number of applications to modify the existing protected structure, including raising the overall height, and the addition of modern features, as outlined in the below planning history section. Given these grant of permissions, it was prudent to take into account the granted designs, when designing the proposed residential development on the subject site.

*'It is considered that any development on site should be reduced in height to a maxim of 4-5 stories, to both meet with the building height requirements of The Bray Town Development Plan and to fit with the existing permitted development on Strand Road.'*

**Response:** Permission was granted recently by An Bord Pleanála for development on the adjoining Dawsons Arcade site for 5/6 storey development, in addition to the granted additional storeys on the Bray Head Hotel to reach 6 storeys (5 storeys high plus undercroft car park. Therefore, the proposed development has been considered in light of the precedent set by the permitted development on the Dawson Arcade site and the Bray Head Hotel site.

*'The height of the development would cause overlooking and have an overbearing impact on the surrounding residential development.'*

*'While some overlooking is acceptable within a urban development, the height of the buildings would result in a unacceptable overbearing impact on the surrounding dwellings.'*

**Response:** It is considered that the proposed residential development has been designed and scaled to avoid appearing visually obtrusive, whilst mitigating against disamenity caused to neighbouring properties by way of overlooking and overshadowing, particularly given the appropriate height of the proposed block and the separation distances adopted between the subject site and dwellings to the west.

*'The Planning Authority would have concerns regarding the suitability of a basement parking at this area due to the risk of flooding of the car park and in addition the applicants have proposed providing ramped access between car parking levels by excavating a significant area of the site within close proximity of the railway line which Iarnród Éireann have serious concerns about.'*

*'A report has been received from Irish Rail who strongly object to the proposal given concerns with respect to impact on the rail line, particularly from the proposed deep basement which has*

*the potential to cause settlement to the railway embankment and tracks with consequent risks to railway safety. Irish rail also object to the proposed balconies overlooking the railway line due to the noise impacts from the railway. and suggests a noise impact assessment be carried out.*

*'The applicants have failed to submit adequate details to show that the proposed engineering works to the car parking area can be carried out without any impacts on the railway line. In addition a number of apartment balconies face onto the railway line and should permission be considered for the development a noise impact assessment for the impacts on future residents from both current and future noise impacts from the railway line would be required.'*

**Response:** The application will be accompanied by a detailed assessment prepared by a suitably qualified engineer.

In recommending a refusal the planner stated:

*'Having regard to*

- the design of the building, height and scale of the building and the significant overshadowing, overbearing and overlooking which would result from the development on existing dwellings*
- the potential traffic hazard from a cr che set down area served by a laneway unsuitable in width to cater for additional traffic.*
- The unsuitability of the proposed car park entrance to provide adequate flood defence*
- the proposed excavation of a substantial area of the site within the immediate vicinity of existing dwellings and a railway line and the lack of information provided to show that these works could be carried out safely without the potential for significant risk of settlement. Permission is not recommended for the development.'*

The refusal reasons were as follows:

*'1. Having regard to*

- (i) the height and scale of the proposed development*
- (ii) the design of the building which is not considered to be a high quality innovative architectural design and which lacks any features to complement the setting*
- (iii) the location of the building within close proximity to a number of protected structures along a largely Victorian traditional promenade*
- (iv) the designation of the site as an Opportunity site in the Bray Town development Plan*

*It is considered that the proposed development would form a dominant and obtrusive feature within this seafront setting, would have an unacceptable overshadowing, overlooking and overbearing impact on a number of existing dwellings in close proximity of the site, would detract from the visual amenity of the area, would compromise the character and setting of historically important buildings, would not be considered a high quality urban design or architectural design solution within this area and would therefore not accord with the zoning objectives of the site as an Opportunity site within the Seafront and would be contrary to the proper planning and development of the area.*

*2. Having regard to*

- (i) The location of the site in close proximity to an area prone to coastal flooding at times of severe weather events*
- (ii) The proposal for a basement parking area with an entrance level that does not meet with the required recommended coastal defence level of 4m.*
- (iii) The proposal for significant excavation to allow for ramped car park access in close proximity to housing and an important rail transport link and the lack of detail provided to confirm safety of proposed structure and existing structures*

*It is considered that insufficient information has been submitted to show that the proposed development would not be unduly impacted upon during coastal flooding events and the proposed works could be carried out without significant impacts to the existing railway line and adjoining housing. The proposed development would therefore be contrary to public health and safety and would be contrary to proper planning and development.*



3. The proposed development would result in a serious traffic hazard because  
(a) the location of the creche set down area is accessed through a private laneway that is unsuitable in width to cater for additional traffic movements resulting from the proposed creche.  
(b) The proposal would result in the removal of existing on street car parking spaces in an area with high parking demand and would therefore exacerbate an existing problem of haphazard parking within the busy seafront area which reduces driver visibility and disrupts the traffic flow in the area.'

Reg. Ref. 17/359 was valid until **23<sup>rd</sup> February 2023**. This is calculated as 5 years for the lifetime of the permission plus 45 days (9 days of Christmas over the 5 years) plus 56 days (Covid 19 regulations). Therefore, the application is no longer live.



Figure 6.0 CGI of development approved under Reg. Ref. 17/359 as viewed northwest from Bray Head.



Figure 7.0 Northeast elevation of development approved under Reg. Ref. 17/359.



Figure 8.0 CGI of development approved under Reg. Ref. 17/359 as viewed within the proposed development.

**Reg. Ref. 12/630002** Planning permission was granted by Wicklow County Council on 1<sup>st</sup> October 2012 for the demolition of 'Dawson's Amusement' building, former restaurant, former shop and derelict residential buildings. A temporary planning permission for 5 years for a surface car-park accommodating 134 no. spaces and for use as a venue for occasional outdoor amusement, carnival and festival space on a hard landscaped surface.

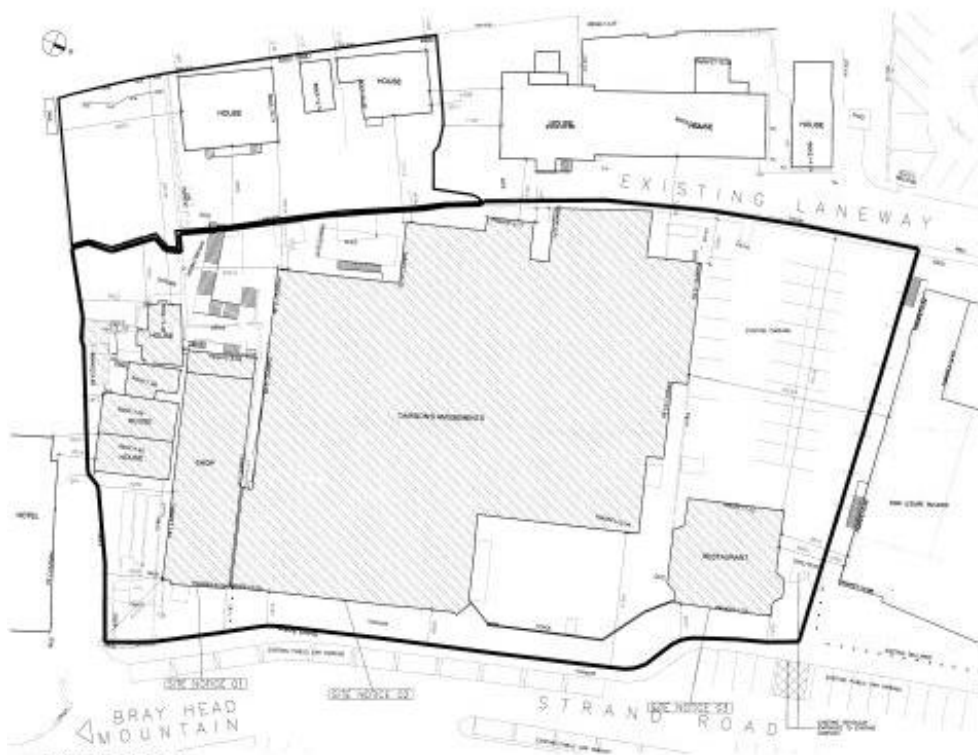


Figure 9.0 Site Plan of the previous 'Dawson's Amusement' building which was demolished as part of Reg. Ref. 12/630002.

### 3.2 Precedents

It is considered useful to examine the planning history associated with sites in the vicinity of the subject site and the Wicklow area more broadly. A review of the Wicklow County Council and An Bord Pleanála planning registers found the following relevant planning applications relating to sites within the surrounding area:

**Former Bray Head Hotel, Strand Road, Bray, Co. Wicklow, A98 XN80 (immediately east/south of the subject site)**

**Reg. Ref. 221410**

Planning permission granted by Wicklow County Council on 4<sup>th</sup> July 2023 for amendments to previously approved Planning Ref. 18/936 & 22/475 at this site known as the former Bray Head Hotel (a Protected Structure RPS Ref. B99) comprising of the following: a) The revised design of front boundary wall profile with removal of pedestrian entrance setback and all with associated piers and capping. b) Amendments to the front façade existing balcony design, to reinstate the original lean-to roof with powder coated metal roofing to selected profile and the addition of a frameless glass balustrading at first floor balconies, mounted behind the existing ornate handrailing and balustrading. c) The revision of the approved mansard roof, to South elevation, by incorporating a raised parapet and parapet gutter. d) Minor elevational changes to external wall finishes, fenestration, and localized balcony changes to western façade. e) The reconfiguration of apartments A014, A029, A034, A046, layout in rear block with the addition of a bay window to Northern façade. f) The addition of a wrap around metal clad canopy to North & East elevations at first floor level. g) Revised flat roof design to remove previously approved green roofs to standard flat roof membrane finish with associated drainage and SUDS amendments. h) The addition of smoke vent risers with associated AOV's and all associated ancillary site works. i) Externally located ESB sub station and associated site works.



Figure 10.0 Elevation of the development as granted under Reg. Ref. 221410.

The Planners Report (dated 20<sup>th</sup> February 2023), included the following commentary which would be important to note for height precedents for a future potential scheme:



*“- The design of new buildings shall draw reference from and complement the historic Victorian style of the seafront; all applications shall be accompanied by a 'design statement' setting out how consideration of the historic character and style influenced the design of the development and how it complements and enhances the area;*

*The changes are noted, in particular the usage of exposed stone aggregate render system to elevations. The permitted development under PRR 18/936 provided for the use of a stone cladding and as is evident from the drawings that cladding would be subservient to the Bray Hotel , the use of the stone aggregate render system would not it is considered be as subtle or subservient as this finish and would have a prominent and negative impact both from the front and in views from the promenade which are listed for preservation. This matter should be further addressed.”*

The development was subject to a further information request, as noted below:

- 1. The Planning Authority is concerned that the provision of bay windows along the northwestern elevation will compromise the redevelopment of the lands to the northwest, whereby such established windows may be compromised in terms of light/ views in the future, which may impact on the redevelopment of these lands. Please address.*

**Applicants Response:**

*‘We have amended the design of the bay window to ensure the glazed section/panel is at a 90 degree angle to gable and thus facing directly East( to Sea ), in line with the glazing used throughout the East elevations. There is no longer views or aspect from apartments to neighboring site to North.’*

- 2. The permitted development under PRR 18/936 provided for the use of a stone cladding and as is evident from the drawings/ photomontage submitted that cladding would be subservient to the Bray Head Hotel which is a listed building , the use of the stone aggregate render system would not it is considered be as subtle or subservient as this finish, and would have a prominent and negative impact both from the front and in views from the promenade/ Strand Road which are listed for preservation. Please Address.*

**Applicants Response:**

*Omitted the use of exposed stone aggregate render entirely from the scheme. Instead of the cut stone cladding as granted in PP ref: LSI9BA (which we feel would visually over power the existing front lime Rendered building) we propose the use of a more subtle self finished monocouche render, Sto Silko or equivalent in a grey colour. See reference B45 6003 below. This render solution is hard wearing and appropriate to the exposed context of the site as it is silicon based and designed for harsh coastal environments. We believe that this grey colour and finish will provide a subtle contrast to the restored white lime render of the existing building and will therefore present subserviently to this protected structure. Please refer to enclosed Architectural Elevations. Please also see below palette sample along with 3D visualization of scheme. It is clear from the 3D visuals that the proposed new block to the rear is now subservient to the original Front building (Old Hotel).*

*In addition minor facade alteration to the rear elevations have also been undertaken as set out in drawings i.e.*

*Rear elevation:*

*The proposed replacement of horizontal (floor level) metal clad spandrel panels, to the rear elevation, with self-finished external render (wall) system to improve the weathering performance and provide a cleaner facade with more emphasized window reveals which are not compromised by extending metal cladding detailing to render junctions (as in original proposal).*

*The replacement of 8 No. Metal clad infill panels with Glazed spandrel panels fully integrated within the overall window glazing system. This will ensure cleaner lines and better weathering of rear facade. This is also a sharper long term finish to the rear facade as the proposed glazed*



*(dark grey in colour) spandrels will maintain a smooth flat surface well beyond that which a metal clad surface could achieve and will require less long term maintenance.'*

3. (a) *The applicant is requested to submit a full revised drainage scheme design. Note it is a preference that nature based sustainable urban drainage measures are to be incorporated into the design in compliance with the County Development Plan 2022-2028 policies and GDSDS requirements. Nature Based SuDS components should be considered as a first option over the traditional drainage measures. All proposed SuDS measures such as Bioretention Areas shall be designed and constructed in accordance with The SUDS Manual (C753).*

*(b) A Statement should be submitted to confirm that the water demand has been designed to accord with the provisions of CPO 13.14 of the County Development Plan 2022-2028 i.e.*

### **Applicants Response:**

*'Report by DBFL consulting, and revised drainage details to include for permeable paving, bio swales, tree pits and planter boxes etc.'*

#### **Reg. Ref. 22475**

Planning permission granted by Wicklow County Council on 27<sup>th</sup> July 2022 for amendments to previously approved (Planning Ref 18/936) at this site known as the former Bray Head Hotel (a protected structure Rps Ref 899) comprising of the following: a) the removal of 4th Floor penthouse above existing protected structure, b) the re-configuration (within granted building footprint/same floor area) of the granted 44 no. apartments to increase unit numbers to 49 no. apartments consisting of 1 no. studio, 19 no. one beds, 20 no. two beds and 9 no. three bed apartments, c) the removal of the granted penthouse stairwell serving the upper floors, and the incorporation of resulting floor area into the Ground Floor commercial unit. d) Elevational changes to reflect reconfiguration apartment layouts with amended fenestration. e) the addition of 6 no parking spaces to the granted 46 spaces, a proposal of 52 spaces in the revised parking layout, including 5 EV charging stations. f) reconfiguration of the hard and soft landscaping, bicycle parking and all associated site works.

#### **Reg. Ref. 18936**

Planning permission granted by Wicklow County Council on 30<sup>th</sup> January 2020 for partial demolition, refurbishment & reconfiguration of former Bray Head Hotel (incl refurbishment & alterations to front façade & removal of signage lettering The Bray Head) & construction of 4th floor (5th storey) penthouse above existing structure & construction of 5 storey over podium res block to rear to provide for mixed use res & commercial dev with total of 46 car parking spaces & 114 cycle parking spaces. The proposed dev will comprise the demolition of single & 3 storey extensions & additions (total area of demolition c 575 sqm) to front, side & rear of existing structure, alterations & amendments to roof plant, & change of use & reconfiguration of part of ground floor to provide for restaurant / bar of c.346 sqm & café of c63 sqm with ancillary back of house / kitchen facilities, staff areas, storage facilities & WCs. The proposed residential dev will also comprise change of use & reconfiguration of existing upper floors of structure to provide for res apartments with refurbished balconies / terraces to front elevation, construction of new 5 storey over podium (6 storeys in total) residential block connected to hotel by 5 storey glazed link over podium with 2 no internal courtyards (c255 sqm) in total). The total no of proposed res units will be 46 comprising 1 studio unit, 12 1 bed units, 22 2 bed units & 11 3 bed units with new balconies to front, rear & internal courtyard elevations & 4 private roof terraces (to be accessed from units A000, A045 & A046). The proposed dev will include internal ancillary space (incl lobby areas, stairs & circulation space) lift cores (incl roof plant) from ground floor to 5th floor level & partial excavation of rear embankment & provision of an undercroft car park for 40 car parking spaces (incl. 1 disabled space), 90 bicycle storage spaces, plant & waste storage room. The provision of public open space to front of site c652 sqm including children's play area with play equipment (c110 sqm), 6 at grade car parking spaces, 24 visitor cycle parking spaces, external

circulation areas, seating terrace & garden seating area for restaurant / café use, all hard & soft landscaping, incl boundary treatments to include new pedestrian accesses & reinstatement of existing front balustrade, provision of suDS measures (including attenuation tank and green roofs); changes in level & all other assoc site excavation works, site dev works & site services above & below ground inc connection to drainage infrastructure.

The Planners Report (dated 3<sup>rd</sup> October 2018), included the following positive commentary which would be important to note for height precedents for a future potential scheme:

*'Generally new buildings shall not exceed the 4 storeys height; where a new structure is proposed to exceed the height of immediately adjacent structures by more than 7 storeys detailed justification and assessment of impact (visual, overlooking, over shadowing etc) shall be required.'*

*The proposed new block is 6 storeys (5 storeys high plus undercroft car park)*

*It is proposed to construct an additional 1 storey above the height of the existing protected structure.*

*Permission was granted recently by ABP for development on the adjoining Dawsons Arcade site for 5/6 storey development.*

*I agree with the applicant, that any proposal for the development of the subject site needs to be considered in light of the precedent set by the permitted development on the Dawson Arcade site.'*

The decision of the planning authority to grant permission was subjected to a third party appeal. The appeal was subsequently withdrawn from An Bord Pleanála on the 27<sup>th</sup> of January 2020. A final grant was issued on the 30<sup>th</sup> January 2020.



Figure 11.0 Elevation of the development as granted under Reg. Ref. 18936.



Figure 12.0 Elevation of the development as granted under Reg. Ref. 18936.

**Reg. Ref. 11630024** Planning permission granted Wicklow County Council on 29<sup>th</sup> March 2011 for Extension of duration of permission 05/170.

1 Marlborough Terrace, Strand Road, Bray, Co. Wicklow

**Reg. Ref. 22232** Planning permission was granted by Wicklow County Council on 7<sup>th</sup> of October 2022 for demolition of the existing building on site and the construction of a new two-storey children's amusement arcade with a gross floor area of c. 734 square metres on a site of c. 0.04 ha. The proposed development will include a change of use from existing ground floor restaurant and upper floor residential to proposed children's amusement arcade and will include ancillary works including building signage, site excavation and development works above and below ground.

The decision of the council was appealed to An Bord Pleanála who upheld the decision to grant permission on 14<sup>th</sup> of February 2024.

Marina Village, Greystones, County Wicklow

**Reg. Ref. 27.EF2016** Planning permission was granted by An Bord Pleanála in 2007 for an integrated harbour/marina mixed development linked to a linear coastal public park, providing leisure, recreational, open space and marine facilities and mixed form residential, commercial, civic and social amenities centred around the harbour and marina. The permission has been added to and amended on numerous occasions, including, Reg. Ref 27.JA0029 and 308561-20. The development consists of 205 apartments and 145 houses.





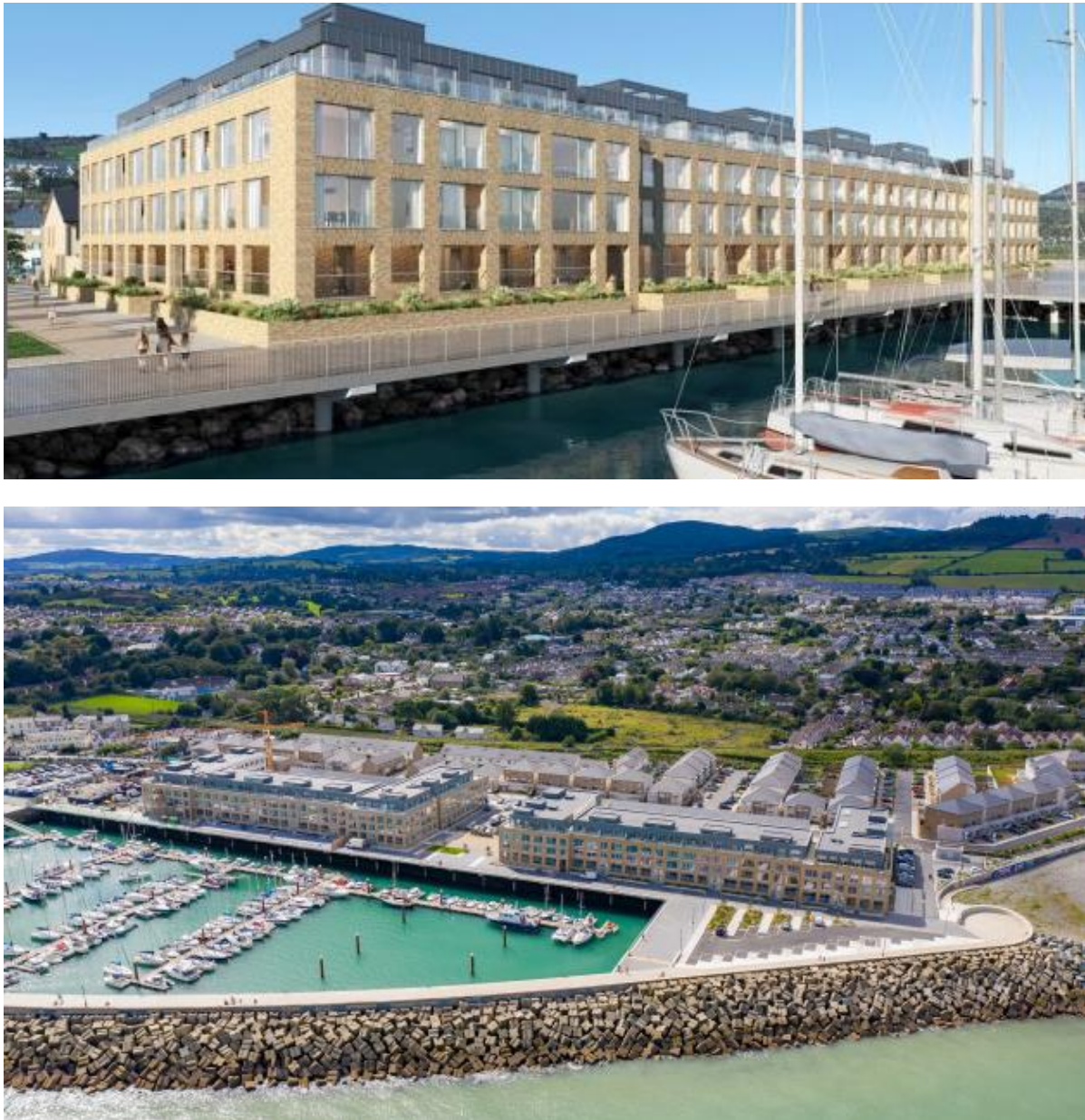


Figure 13.0 Images of the completed Marina Village at Greystones as approved under Reg. Ref. 27.EF2016.

Lands at St Michael's Hospital Car Park, Crofton Road, Dun Laoghaire, Co. Dublin

**Reg. Ref. TA06D.309098** Permission granted by An Bord Pleanála on 28<sup>th</sup> April 2021 for a strategic housing development comprising the demolition of an existing house, construction of 102 no. Build to Rent apartments and associated site works.

The above development provided for 102 no. apartments accommodated within two blocks ranging in height from five to thirteen storeys and included an extent of ancillary communal facilities. The development achieved a residential density of 309 units per hectare.

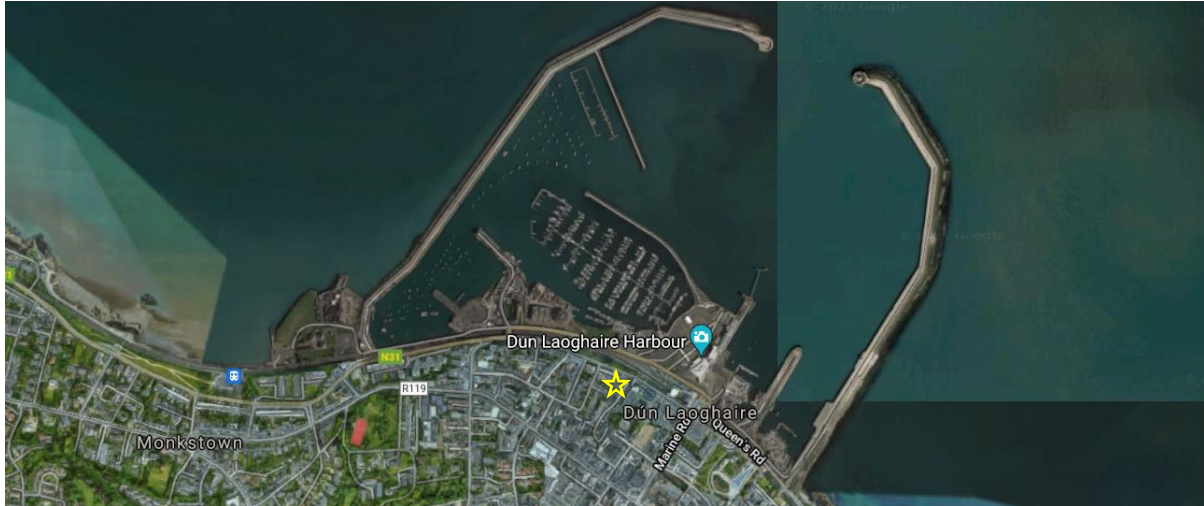


Figure 14.0 Site of Reg. Ref. PL06D.309098, yellow star, relative to Dun Laoghaire Waterfront.



Figure 15.0 CGI imagery of development approved under Reg. Ref. PL06D.309098 looking south-eastwards from Crofton Road.





Figure 16.0 CGI imagery of development approved under Reg. Ref. PL06D.309098 looking south-westwards from Crofton Road

#### 4.0 Proposed Development

As per the preliminary development description, the subject proposal comprises the construction of a residential development of 103 no. units comprising 2 no. blocks as follows:

##### Block A:

- Car park area - 2400 sq.m
- Car parking spaces - 80 spaces
- Retail/creche area - 840 sq.m
- Apartments:
  - 1 bed - 24 no.
  - 2 bed - 48 no.
  - 3 bed - 09 no.

##### Block B:

- 1 bed - 03no.
- 2 bed - 14 no.
- 3 bed - 05 no.

##### Total mix:

- 1 bed - 27 no - 26%
- 2 bed - 62 no - 60%
- 3 bed - 14 no - 14%
- Total units - 103 units

Each residential unit will have shared access to 1680sq.m of landscaped communal open space. In accordance with the Guidelines for 'Sustainable Urban Housing: Design Standards for New Apartments' (July 2023) as noted overleaf.

The minimum requirement for communal open space based on unit mix would be calculated at:

- 1 bed - 27 no – x 5sqm = 135sqm
- 2 bed - 62 no – x 6/7sqm = 372-434 sqm
- 3 bed - 14 no - x 9sqm = 126 sqm

= 633-695 sqm (therefore the proposed 1680 sqm is well in excess of this requirement.

### Minimum floor areas for communal amenity space

Studio	4 sq m
One bedrooms	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Section 3.1.4 and 8.5 of Appendix 1 of the Wicklow County Development Plan requires 15% of the site area as public open space as such, 880sq.m(15.7%) on the podium is to be allocated to public open space.

Please find enclosed S.247 Pre-application Architectural Design Booklet as prepared by the project architects: MCORM Architecture and Urban Design.

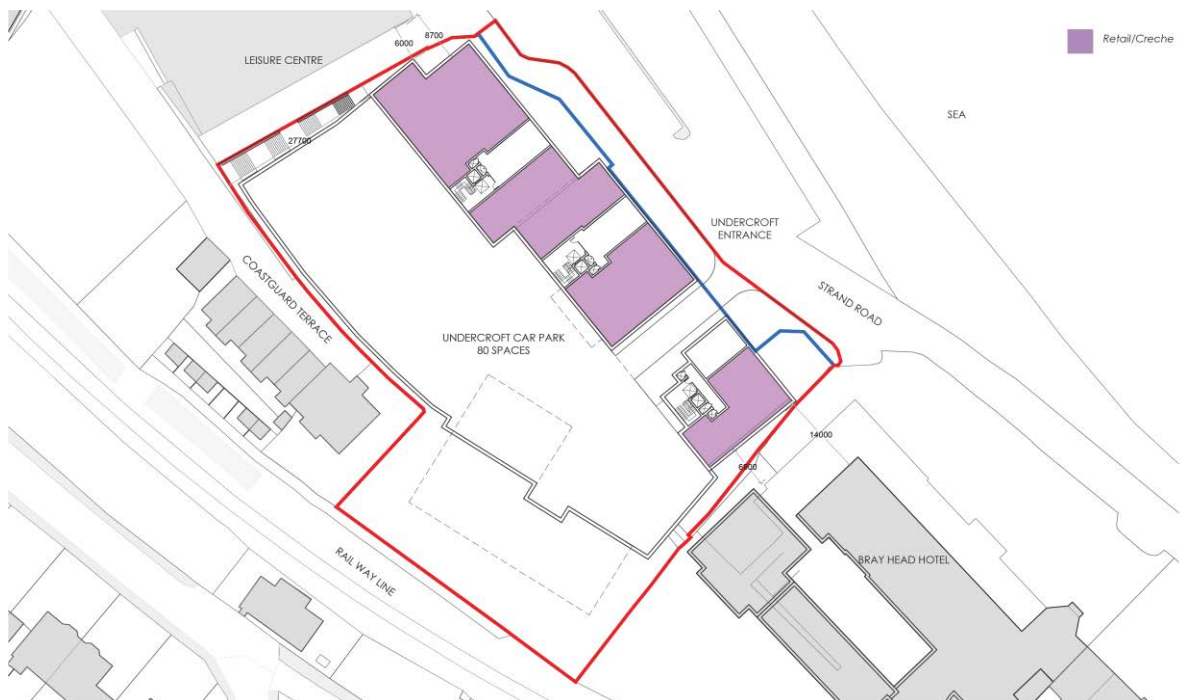


Figure 17.0 Indicative site layout plan (ground floor) for the subject proposal.



Figure 18.0 Indicative site layout plan (typical floor plan) for the subject proposal.



Figure 19.0 Indicative site layout plan (penthouse floor plan) for the subject proposal.

## 5.0 Planning Context

This section of the report will examine the planning framework, including national, regional and local, that informs the use and development of the subject lands.

### 5.1 Bray Municipal District Local Area Plan 2018 – 2024

We note that this Local Area Plan is coming to the end of its life this year.



Work has commenced on the review of the Bray Municipal District Local Area Plan 2018 - 2024 and the preparation of the new plan. Bray Municipal District Local Area Plan 2025 includes the settlements of Bray Town & Environs, Enniskerry and Kilmacanogue. The pre-draft public consultation will commence on 20<sup>th</sup> November 2024 and will be accepting submission until 18<sup>th</sup> December 2024.

Bray Town and its environs is a designated Level 1 'Metropolitan Area Consolidation Town' Settlement.

### Zoning

The Site is zoned as 'SF Seafront Area'. The objective for this area is to *remain an inviting, animated and attractive seafront area, with a vibrant commercial leisure sector supervised by permanent residences, that functions as the primary tourist, recreational and leisure centre of the town*. The Council will favour high quality developments that serve to attract visitors to the seafront to enjoy the beauty of its natural and manmade physical amenities, the high standard of its services, and its relaxed, pleasant and dynamic atmosphere. In doing so it will thereby contribute towards ensuring a pleasant stay for visitors and garner repeat business through subsequent visits and word of mouth promotion

According to the Local Area Plan, in SF zoned areas, a proposed development will only be permitted where it does not negatively impinge on: (1) the amenity and character of the area; (2) its natural and built heritage; (3) protected views and prospects; and (4) protected structures.

In the SF zone, the following objectives apply:

- The design of new buildings shall draw reference from and complement the historic Victorian style of the seafront; all applications shall be accompanied by a 'design statement' setting out how consideration of the historic character and style influenced the design of the development and how it complements and enhances the area;
- Generally new buildings shall not exceed the 4 storeys height; where a new structure is proposed to exceed the height of immediately adjacent structures by more than 1 storey detailed justification and assessment of impact (visual, overlooking, over shadowing etc) shall be required;
- New buildings will be expected to follow the established building line; where a set back from the road is prevalent, such spaces shall generally be laid out as amenity spaces / gardens rather than car parking, and all efforts shall be made to locate car parking underground or to the rear of new developments; where car parking to the front cannot be avoided, the quantum of spaces shall be minimised, the appearance of hard surfacing shall be ameliorated by use of innovative materials and significant landscaping shall be required;
- It is the overriding objective of the Council to promote the seafront area as the primary tourist, leisure and recreational centre of the town and the quality of residential amenity must be viewed in light of this objective and the long-standing use of this area for leisure activities.

It is submitted that the proposed residential, retail and creche development is acceptable uses with regards to the zoning applying in the subject site.



Figure 20.0 Extract from the Land Use Zoning Map, Site marked with red star.

As a general rule the minimum and maximum density for new residential developments shall be 50 and 150 units per hectare respectively as in Sustainable Residential Development and Compact Settlement guidelines Bray can be considered a metropolitan Town. These densities may not be appropriate in all instances but will serve as a general guidance rule for developers particularly in RE zoning areas. The Council will only allow higher densities up to 150 units per hectare at appropriate sites, typically these will be closer to the town centre area and be well serviced (shops, public transport etc.).

In the SF zoned Seafront area, the following development standards shall apply:

- \* Maximum plot ratio = 2.75
- \* Maximum site coverage = 65%

The granted development would still meet the standards of the Bray Town Plan which allows for a maximum site coverage of 65%. The proposed development would have a site coverage of 39% accounting for the Footprint of the Blocks, Retail and creche and excluding the Undercroft/Terraced Podium. The site coverage is 78%, including the Undercroft Car Park. The plot ratio With Undercroft is:- 2.48. The plot ratio Without Undercroft is: - 2.03.

Due to the subject site's proximity to public transport corridors, it is considered that a higher plot ratio may be permissible subject to considered, high-quality design.

## 5.2 Wicklow County Development Plan 2022-2028

The Wicklow County Development Plan 2022-2028 is the relevant statutory development plan for the subject site.

### Heritage

Although the Site is not identified as a Protected Structure, the adjacent site; 'Bray Head Hotel' (RPS No. 99) and nearby Nos. 1-6 Fontenoy Terrace (RPS No. 100) are both Protected Structures. The view from the south harbour along the Promenade and Strand Road (Reg. Ref. 15) is a Protected View.



Figure 21.0 Image showing the location of adjacent Protected Structures.

The following heritage policy is therefore relevant to the proposals;

- CPO 8.13** *To ensure the protection of all structures, items and features contained in the Record of Protected Structures.*
- CPO 8.14** *To positively consider proposals to alter or change the use of protected structures so as to render them viable for modern use, subject to architectural heritage assessment and to demonstration by a suitably qualified Conservation Architect / or other relevant expertise that the structure, character, appearance and setting will not be adversely affected and suitable design, materials and construction methods will be utilised.*

It is submitted that the proposed development would not compromise the character or integrity of the protected structure and to ensure compliance with the above policy.

The granted development under ABP Ref. 248754 was considered to have a negative impact of the protection of the protected structure, but was considered acceptable by An Bord Pleanála. We note that since this application, the Bray Head Hotel has been granted a number of applications to modify the existing protected structure, including raising the overall height, and the addition of modern features, as outlined in the below planning history section. Given these grant of permissions, it was prudent to take into account the granted designs, when designing the proposed development on the subject site.

### Settlement Strategy

- CPO 4.1** *To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self-sustaining growth towns, self-sustaining towns and small towns.*
- CPO 4.2** *To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.*
- CPO 4.3** *Increase the density in existing settlements through a range of measures including bringing vacant properties back into use, reusing existing buildings, infill development schemes, brownfield regeneration, increased building height where appropriate, encouraging living over the shop and securing higher densities for new development.*
- CPO 4.4** *Support investment in infrastructure and services which aligns with the Core Strategy and Settlement Strategy.*
- CPO 4.5** *To ensure that all settlements, as far as is practicable, develop in a self sufficient manner with population growth occurring in tandem with physical and social*

*infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.*

- CPO 4.6** *To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.*
- CPO 4.7** *To implement the Core Strategy and Settlement Strategy, to monitor development and the delivery of services on an ongoing basis and to review population targets where service delivery is impeded.*
- CPO 4.9** *To target the reversal of town and village centre decline through sustainable compact growth and targeted measures that address vacancy, dereliction and underutilised lands and deliver sustainable renewal and regeneration outcomes.*
- CPO 4.10** *To support the sustainable development of rural areas by encouraging growth while managing the growth of areas that are under strong urban influence to avoid over-development.*
- CPO 4.11** *To strengthen the established structure of villages and smaller settlements both to support local economies and to accommodate additional population in a way that supports the viability of local infrastructure, businesses and services, such as schools and water services.*
- CPO 4.12** *To support the development of a 'New Homes in Small Towns and Villages' initiative between the Local Authority, Irish Water, communities, and other stakeholders to provide serviced sites with appropriate infrastructure to meet rural housing requirements in small towns and villages.*
- CPO 4.13** *To require that the design, scale and layout of all new residential development is proportionate to the existing settlement, respects the character, strengthens identity and creates a strong sense of place.*
- *For Level 6 towns no one development should increase the existing housing stock by more than 10%.*
  - *For Level 7 Villages, any multi-unit housing development should not be larger than 10 units*
  - *For the Level 8 Villages, any multi-unit housing development should not be larger than 5 units.*
- CPO 4.14** *To ensure that key assets in rural areas such as water quality and natural and cultural heritage are protected to support quality of life and economic vitality.*
- CPO 4.15** *To protect and promote the quality, character and distinctiveness of the rural landscape.*
- CPO 5.1** *To protect and maintain the viability of town and village centres, target the reversal of decline and deliver sustainable reuse and regeneration outcomes.*
- CPO 5.2** *To protect and increase the quality, vibrancy and vitality of town and villages centres by promoting and facilitating an appropriate mix of day and night time uses, including commercial, recreational, civic, cultural, leisure and residential uses and to control uses that may have a detrimental impact on the vitality of the streetscape and the public realm.*
- CPO 5.3** *To particularly promote and facilitate residential development in town and village centres:*
- *Promote the 'active' use of above ground floor levels, and in particular to promote the concept of 'living over the shop' in centres. Where a 'living over the shop' use is proposed, a relaxation in density, car parking and open space standards will be considered, where the development meets very high quality of design and accommodation.*



- Other than in the retail core area, residential development shall be the primary development objective for lands zoned town centre or village centre. This shall not preclude commercial development on lands zoned town centre or village centre when suitable sites are not available in the core retail area.
- For smaller towns that do not have a defined core retail area the priority will be to facilitate uses which are consistent with maintaining activity and vitality in the town centre and addressing vacancy. While this may allow for the development of residential only developments in the town centre, any such proposals shall fully justify how such use will not diminish vibrancy in the town centre, or result in the town not being able to meet the retail / services needs of the local population.

**CPO 5.4** To limit the concentration or clustering of uses that have bland inactive frontages and that fail to interact with the streetscape including car parks, blank shop frontages and ground floor offices. Such uses undermine the vitality of the town or village centre.

**CPO 5.24** In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town / city cores, planning authorities are required to explicitly identify areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES. In this regard, the identification of locations for increased building height shall be carried out in the preparation of Local Area Plans for settlements in Tiers 1-3 of the County Settlement Hierarchy as these are deemed the only settlements of sufficient scale and diversity in urban grain to accommodate such increases in height.

It is considered that the proposed development would have regard to the above policies. It is considered that the subject site has the capacity to support development which is considered to be consistent with the aforementioned policies of the Wicklow County Development Plan 2022-2028 demonstrating compliance with the zoning objective for the site and the overall vision for development of Bray.

The core strategy table below as included within the Wicklow County Development Plan 2022-2028, sets a housing target for Bray from 2016-2031 of 4,897 no. units (this figure is less completed units from 2017-2020).

SETTLEMENT		POPULATION & HOUSING				ZONING							
Settlement Type	Settlement name	A Census 2016 Population	B Census 2016 (%)	C Housing Target 2016-2031  (less completed units 2017- 2020)  (units)	D Housing Target  (as % of County 2031 target)	E Development capacity of existing zoned lands  (units) <sup>7</sup>	F Development capacity of existing zoned land within built up area  (units)	G Development capacity of existing zoned land outside built up area  (units)	H Development capacity of existing zoned land within built up area as % of total development capacity  (F/E)	I Units required to be provided outside of built up area (units)  (C – F)	J Surplus capacity of existing zoned land outside built up area (units)  (G – I)	K Surplus land outside of existing built up area  (ha)	L Method of addressing shortfall / surplus
County	Wicklow	142,425		11,719	100%								
Key Towns	Bray	29,646	21%	4,897	42%	6,500	2,000	4,500	31%	2,897	1,600	40 <sup>8</sup>	Will be addressed in next LAP – comprises strategic sites
	Wicklow – Rathnew	14,114	10%	1,742	15%	4,200	2,000	2,200	48%	0	2,200	55 <sup>9</sup>	21ha already under construction; remaining surplus will be addressed in next LAP
Self Sustaining (Growth) Towns	Acklow	13,226	9%	1,056	9%	5,200	2,100	3,100	40%	0	3,100	78	11ha already under construction; remaining surplus will be addressed in next LAP
	Greystones-Delgany	18,021	13%	1,078	9%	2,900	1,700	1,200	59%	0	1,200	30 <sup>9</sup>	7.5ha already under construction; remaining surplus will be addressed in next LAP
	Blessington	5,234	4%	514	4%	1,450	300	1,150	21%	215	935	31 <sup>9</sup>	Surplus will be addressed in next LAP

Table 1.0 Extract of the core strategy table contained within the Wicklow County Development Plan 2022-2028, with Bray outlined in red.

Based on the provisions of the above table, a total housing target for Bray over the plan period of 4,897 no. units is provided (this figure is less completed units from 2017-2020). A potential future proposal of between 80-120 no. units fall to be considered under the 4,897 no. housing target outlined in the Core Strategy table above. The proposed development of 103 no. units would comply with the new housing target figures.

It is submitted that the proposed development of 103 no. units would accord with the above policies and objectives providing for a high-quality residential development at a sustainable density which is appropriate in the context of the site's location in Bray and will support urban compaction and

consolidation. The proposal makes efficient use of an otherwise underutilised site and provides for a wide mix of unit types and sizes which will foster the creation of a diverse residential community.

### 5.2.2 Quantitative Standards

The Development Plan includes a number of quantitative standards which are relevant in the context of redeveloping the subject site. These include the following:

#### Building Height and Density

Chapter 6 of the development has regard to height and density guidelines of development of housing Density.

Table 6.1 of the development plan has regard for Density Standards as noted below:

Location	Density Standards
<b>Large Towns<sup>5</sup></b> (Bray, Greystones-Delgany, Arklow, Wicklow –Rathnew and Blessington)	<ul style="list-style-type: none"> <li>Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.</li> <li>Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare.</li> <li>Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.</li> </ul>

Table 2.0 Table 6.1 of the development plan has regard for Density Standards in Bray.

As Bray Daly Station is situated 1km from the subject site, the minimum density per hectare would be 50 units. As the site is 0.56ha, a minimum of 30 units would be acceptable on this site.

#### **Height and Scale**

**CPO 6.17** *To facilitate development incorporating higher buildings (i.e. buildings that exceed the contextual prevailing height) 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. In accordance with the SPPR 3 of Urban Development and Building Heights Guidelines, where:*

- An applicant for planning permission sets out how a development proposal complies with the Urban Development and Building Heights Guidelines, particularly SSPR1 and SSPR2 thereof; and*
- the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and Guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise. In accordance with the SPPR 1 of Urban Development and Building Heights Guidelines, Planning Authorities are required explicitly identify areas where increased building height will be actively pursued for redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES. In this regard, the identification of locations for increased building height shall be carried out in the preparation of Local Area Plans for settlements in Tiers 1-3 of the County Settlement Hierarchy as these are deemed the only settlements of sufficient scale and diversity in urban grain to accommodate such increases in height.*

**CPO 6.18** *To ensure that building height within future development makes a positive contribution to the built form of the area, is not obtrusive and does not adversely impact on the streetscape, local amenity or views. Require all development proposals, including infill*

development, to include an analysis of the impact of building height and positioning of buildings on:

- The immediate & surrounding environment - streetscape, historic character;
- Adjoining structures;
- Open spaces and public realm;
- Views and Vistas

Due to the subject site's location in Bray, it is considered that following the prevailing height of the area would be the most appropriate for development at this site which takes into consideration the zoning objective of neighbouring sites as it would best represent the pattern of development thus respecting the character of the area.

The immediate area surrounding the subject site is considered to be mixed in nature with granted additional storeys on the Bray Head Hotel to reach 6 storeys (5 storeys high plus undercroft car park), additionally permission was granted by An Bord Pleanála for development on the adjoining Dawsons Arcade site for 5/6 storey development, and residential units comprising two-storey terraced dwellings situated to the east of the site and industrial buildings situated to the north, west and south. However, with regard to development in the wider area, it is noted that there is a provision for increased height and density than that as existing. We note, however, the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018, takes precedence over local guidance.

It is submitted that the proposed development accord with these provisions at 7 storeys in height.

#### Car Parking

Section 3.1.5 of Volume 3 Appendix 1 included in the Wicklow County Development Plan 2022- 2028 states that the maximum parking provision should be 1.2 spaces per 1-2 bedroom units, and 2 spaces per 3 bedroom unit.

Use Class	Parking spaces to be provided
Theatre, Cinema, Stadium	0.33 per seat
Church	0.33 per seat
Nursing Homes	0.5 per bed
Third Level Colleges	0.5 per student
Hotel (excl function room)	1 per bedroom
School (primary)	1.2 per classroom
School (secondary)	2.0 per classroom
Hospital	1.5 per bed
Clinics / Medical Practices	2 per consultant
Dwelling 1-2 bedrooms	1.2 per unit <sup>6</sup>
Dwelling 3-4 Bedrooms	2 per unit

Table 3.0 Extract of Table 2 of the Wicklow Development Plan 2022-2028 which shows the maximum car parking standards for land-uses relevant to the subject site.

Section 2.1.7 of Appendix 1 notes 'new / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Table 2.2, with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Table 2.3 to follow shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.'

As such these car parking standards are maximum in nature and may be reduced in specific locations where it is demonstrated that other modes of transport are sufficient for the needs of residents.

89 x 1 & 2 bed apartments – 1.2 space per apartment = 106.8 (107) maximum

14 x 3 bed apartments = 2 spaces per apartment = 28 maximum.

Total = 135 car parking spaces maximum.

The proposed development seeks to provide 80 no. car parking spaces. Therefore this provision is below the maximum standards in the Wicklow County Development Plan 2022- 2028 which outlines parking maximum of 1.2 spaces per 1-2 bedroom units, and 2 spaces per 3 bedroom unit (which would result in a maximum parking provision of 135 no. residential car parking spaces, however, as this would be a maximum this is not desirable). We note that this maximum refers to houses and not just apartment units which statistically have higher car ownership compared to apartments. The subject site is located in close proximity to public transport, with Bray Bus Depot situated 800m from the site and Bray Daly Station situated 1km from the site. Having regard to this, it is considered the car parking standards shall be taken as maximum in accordance with the Wicklow County Development Plan 2022- 2028. This is also consistent with the Apartment Guidelines, given the location of the subject site in close proximity to employment, existing amenities and the availability of public transport, it is considered the proposed development is located within an Intermediate Urban Location, and thus, in accordance with the Apartment Guidelines 2023, the Planning Authority must consider a reduced overall car parking requirement.

For every 5 residential units provided with only 1 space, 1 visitor space shall be maximum, therefore 21 visitor spaces would be the maximum.

80 (total provision) – 21 (visitor) = 69 (spaces after visitor spaces).

69 (spaces after visitor spaces) ÷ 103 (total unit number) = 0.67 spaces per unit.

Therefore, excluding the visitor car parking, a car parking rate of 0.67 spaces per unit (including car share spaces) is proposed for the apartments. Residential visitor parking (21 no. spaces) is provided in accordance with the WCC Development Plan 2022- 2028 which states that *“for every 5 residential units provided with only 1 space, 1 visitor space shall be provided.”* This level of provision will ensure no overspill car parking occurs onto the external streets.

The ratio of car parking spaces per apartment is considered to be appropriate given the location, proximity and access to high quality public transport. This reduced level of residential parking is considered to be in accordance with the Wicklow County Development Plan 2022-2028, the Apartment Guidelines 2023 and the Sustainable Residential Development and Compact Settlement Guidelines 2024 given the accessibility of the site and the proximity to local services and amenities.

#### Bicycle Parking

The guidelines seek that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road/street network. Section 2.1.8 of these guidelines, outlines the following guidance regarding the quantity of bicycle parking spaces required for new apartment developments. An extract is provided below in Table 4.0.

Type of Development	Cycle Parking Standard
Residential units	1 space per bedroom + 1 visitor space per 5 units

Table 4.0 Extract of Table 1 of the Wicklow County Development Plan 2022-2028 showing bicycle parking spaces required.



As outlined above, the Development Plan requires 1 no. bicycle parking space per bedroom for long term with short stay/visitor cycle parking to be provided at a rate of 1 no. per 5 units.

Bicycle parking spaces to be confirmed at a later date, but we confirm the provision will be in line with the development plan guidelines in addition to compact settlement guidelines.

#### Large scale town centre retail, commercial and mixed use schemes

Section 3.2.3 of Appendix 1 in the development plan has regard for Large scale town centre retail, commercial and mixed use schemes. The following is of note:

In the context of larger scale retail / commercial / mixed use developments, while adequate car parking, separate service areas and convenient access by public transport and by walking / cycling from surrounding residential areas are essential elements, these must be supplemented by features that improve the overall attractiveness of the scheme to the public. Such features can include for example:

- Public realm of appropriate scale, design and enclosure;
- The provision and design of street furniture, e.g. telephones, seats, litterbins, cycle facilities;
- The provision within the overall design of the scheme for public facilities, e.g. toilets, advice centres, health clinics, crèches, child and special care facilities;
- Activities and uses that keep the centre alive both during the day and evening;
- Active facades – blank facades not visible to public areas;
- The inclusion of residential uses, particularly apartments, as an integral part of the centre in order to generate evening activity and security of the centre;
- An overall design strategy that helps promote variety (by the use of differing shopfronts, plot widths, setbacks, signs etc.) but set within an overarching and cohesive design concept that unites the whole;
- The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of antisocial activity. All unsightly areas for example, service cores, delivery areas, should be screened from surrounding residential areas and from pedestrian corridors within the scheme. Attention shall be given to the treatment of car parking so as to avoid unsightly views. Special consideration shall be given to the detailing of extensive frontages and flank walls. Considered screening should form an integral part of any design, but where this is not possible, supplementary tree planting and landscaping will be necessary;
- Industrial materials / appearance e.g. metal / industrial panel finishes, lacking in fenestration, industrial fencing etc will not normally be accepted;
- Considered tree planting and landscaping must, in any event, form an integral part of the general design of any large scale scheme;
- Appropriate signage;
- Protection of residential and visual amenities.

It is considered that the proposed development would have regard to the above standards.

#### Health, Care & Development

Section 7.3.2 of the development plan has regard to Health, Care & Development, stating that:

*‘The provision of childcare and preschool facilities is recognised by Wicklow County Council as a key piece of social infrastructure enabling people to play a more active role in society, particularly in accessing employment and education. Childcare services range from childminding a small number of children in a private home to pre-schools and crèches. A large number of childcare facilities now provide a full range of services from caring for newborns to pre-school and Montessori type education. The growth in population and housing in Wicklow over the last number of years has not been matched with the necessary growth in childcare services, notwithstanding the implementation of the DoECLG Childcare Facilities Guidelines, which require the provision of 20 childcare places for every new 75 housing units granted permission.’*

Therefore a childcare facility will need to be provided within any development over 75 residential units. It is considered that the proposed development would be consistent with the above standards as it includes a creche.

### 5.3 Project Ireland 2040 – National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework (NPF), 2018, seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

*'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'*

The NPF a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale is to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units over the coming years, up to 2040 to meet a growing demand. With regards to managing growth, Section 1.2 of the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of Dublin, Cork, Limerick, Galway and Waterford are targeted for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth. In addition, National Strategic Outcome No. 1 '*Compact Growth*', provides that the NPF is focused on the careful management of the sustainable growth of compact cities, towns and villages in order to add value and create more attractive places in which people can live and work.

To achieve this outcome, there must be an increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village. The National Planning Framework more specifically outlines that, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

*'a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.*

A number of objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. We consider that the following national policy objectives to be of relevance. These objectives reflect the type of growth that is sought in line with the goals of the NPF:

- NPO 3a** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*
- NPO 3b** *Deliver at least half (50%) of all new homes nationally, within the built-up footprint of existing settlements.*
- NPO 4** *Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*
- NPO 5** *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

- NPO 6** *Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*
- NPO 11** *In meeting urban development requirements there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*
- NPO 33** *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*
- NPO 35** *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 proposed development is appropriately sited relative to existing residential housing developments and, as such, does not constitute urban sprawl. The subject lands have been earmarked for residential development for some time and the principle of same on site has been established through the site's planning history.

The location of the site will ensure that growth is contained within the metropolitan boundary, and will offer '*improved housing choice, transport mobility and quality of life.*' The proposed development is consistent with the above as it involves the development of underutilised land which is in Bray and in close proximity to its associated amenities and services. The proposed development complies with the relevant National Policy Objectives identified in the National Framework comprised within Appendix 1 on pages 159 to 169.

The proposed development is consistent with the above as it involves the re-development of underutilised land which is in close proximity to existing facilities and public transport.

#### **5.4 Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018**

These guidelines, published in December 2018, outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development.

In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. Specific Planning Policy Requirement 1 goes on to outline the following in relation to this:

*'In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.'*

The Urban Development and Building Height Guidelines 2018 largely focus on dealing with population growth by focusing new residential development in existing built-up areas. The guidelines now draw focus on the arbitrary height caps on apartment buildings in the inner city, allowing for taller buildings to be considered more favourably. Mid to high-rise proposals will still have to fit in with the existing area, respect its character and are subject to local policy to prevent major traffic impacts, loss of amenity, light etc. The guidelines identify former industrial estates, dockland locations and low-density shopping centres as potential areas for taller buildings. As such, supplying accommodation within the city on a former industrial/commercial site is fitting with these criteria.

It is considered that the proposed development would be consistent with the above standards.

## 5.5 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2022)

The *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*, were published by the Department of the Environment, Community and Local Government in 2022. The 2022 Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.

Further, the guidelines include, but are not limited to, the following standards in relation to apartment developments:

### Unit Mix

Specific Planning Policy Requirement 1 provides guidance in regard to unit mix. The minimum number of dual aspect apartments as follows:

*'Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).'*

### Minimum Floor Area

Specific Planning Policy Requirement 3 sets out minimum apartment floor areas. The overall apartment floor area sizes required for apartment units outlined in the 2022 Guidelines are as follows:

- Studio apartment (1 person) 37sq.m
- 1-bedroom apartment (2 persons) 45sq.m
- 2-bedroom apartment (4 persons) 73sq.m
- 3-bedroom apartment (5 persons) 90sq.m

Further to this, it is a requirement that: *'the majority of all apartments in any proposed scheme of 10 or more apartments exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%)'*.

### Minimum Aggregate Floor Areas and Minimum Widths for Living/Dining/Kitchen

The minimum aggregate floor areas and minimum widths for living/dining/kitchen required for apartment units outlined in the 2022 Guidelines are as follows:

Apartment type***	Width of living/dining room	Aggregate floor area of living / dining / kitchen area*
Studio	4m**	30sqm**
One bedroom	3.3m	23sqm



Two Bedroom (3 Person)	3.6m	28sqm
Two Bedroom (4 Person)	3.6m	30sqm
Three Bedrooms	3.8m	34sqm

\* Note: An enclosed (separate) kitchen should have a minimum floor area of 6.5 sq. metres

\*\* Note: Combined living/dining/bedspace, also includes circulation

\*\*\* Note: Variation of up to 5% can be applied to room areas and widths subject to overall compliance with required minimum overall apartment floor areas

Table 5.0 Minimum Aggregate Floor Areas and Minimum Widths for Living/Dining/Kitchen

#### Minimum Bedroom Floor Areas/Widths

The minimum bedroom floor areas/widths for apartment units outlined in the 2022 Guidelines are as follows:

Type	Minimum width	Minimum floor area
Studio	4m**	30sqm**
Single bedroom	2.1m	7.1sqm
Double Bedroom	2.8m	11.4sqm
Twin Bedroom	2.8m	13sqm

\*\* Note: Combined living/dining/bedspace

Table 6.0 Minimum Bedroom Floor Areas/Widths

The overall aggregate bedroom floor areas for apartment unit areas are required as follows:

- One bedroom - 11.4 sq m
- Two bedrooms (3 person) - 13 + 7.1 sq m = 20.1 sq m
- Two bedrooms (4 person) - 11.4 + 13 sq m = 24.4 sq m
- Three bedrooms - 11.4 + 13 + 7.1 sq m = 31.5 sq m

#### Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance in regard to dual aspect apartments.

*In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

- A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

#### Floor to Ceiling Height

The 2022 Guidelines outlines the following standard in relation to floor to ceiling height:

*Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.*

### Lift and Stair Cores

Specific Planning Policy Requirement 6 provides the following guidance in regard to lift and stair cores:  
*A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.*

### Internal Storage

The 2022 Guidelines outlines the following standard in relation to internal storage:

Type	Minimum Storage Requirements
Studio	3sqm
One bedroom	3sqm
Two bedroom (3 Person)	5sqm
Two bedroom (4 Person)	6sqm
Three or more bedrooms	9sqm

Table 7.0 Internal storage requirements.

### Minimum Private Open Space Requirements

The 2022 Guidelines outlines the following standard in relation to the overall floor area of private open space provided in each apartment:

Unit Type	Required floor areas for private amenity space
Studio	4sq.m
One Bedroom	5sq.m
Two Bedroom (3 person)	6sq.m
Two Bedroom (4 person)	7sq.m
Three Bedrooms	9sq.m

Table 8.0 Minimum Private Open Space Requirements.

It is considered that the proposed development would be consistent with the above standards.

### Height

The Local Plan states that a height of 4 storeys (including ground floor) will generally be considered appropriate in the Bray 'town centre' zone, irrespective of adjoining property heights. However, the Council may permit heights above this, where the specific context of the site and the design of the building allow it, for example where additional storey's are set back from street frontage. The Guidelines do not provide standards for the overall height of buildings. Given the existing planning permission on the site (Reg. Ref. 17/359) which approved a 6-storey building, it is considered that the proposed height of 7-storeys would be suitable. Given the site is located on a strong promenade, occupies a deep plot and faces the sea, there should be an opportunity for such height in this location.

We note that development proposals will be acceptable where, in compliance with the zoning objective, they make a positive contribution to the character, function and appearance of the Protected Structures and their settings. It is submitted that development proposed at this site will include architectural design which is complimentary of the adjacent Protected Structure.

It is considered that the proposed development would be consistent with the standards set out in Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities, published by the Department of the Environment, Community and Local Government in December 2020.

### Density

Bray is considered to be an 'Intermediate Urban Location' according to the Apartment Guidelines. Therefore, broadly >45 dwellings per hectare is recommended for such a location. However, the Guidelines do accept there may be variations to this, subject to location.

### Security Considerations

Section 3.40 of the Guidelines recommend that in order to ensure visitor and occupant safety natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks. Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths.

### Car Parking

In Intermediate Urban Locations, such as Bray, which is well served by public transport. Therefore, for housing schemes with more than 45 dwellings per hectare net (18 per acre), Wicklow County Council will consider a reduced overall car parking standard.

### Bicycle Parking

The Guidelines seek that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road / street network.

It is considered that the proposed development will accord with the bicycle and car parking standards as outlined in the Design Standards for New Apartments (2020).

## **5.6 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)**

As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines or Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policies and guidelines pertaining to the planning and development of urban and rural settlements.

As a Regional Growth Centre, the guidelines list the following key priorities in order of priority are:

- (a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Regional Growth Centre to smaller towns and villages and rural areas in the hinterland,
- (b) strengthen town centres,
- (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,
- (d) realise opportunities for adaptation and reuse of existing buildings and for backland, brownfield and infill development,
- (e) deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the town, and
- (f) deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement.

The guidelines provide Special Planning Policy Regulations as follows:

## SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans<sup>15</sup> shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms<sup>16</sup> at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

It is considered that the proposed development would be consistent with the above standards.

### 5.7 Quality Housing for Sustainable Communities Guidelines for Local Authorities

The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes, sustaining Communities contained in the Government Statement on Housing Policy focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes. The guidelines outline the minimum floor areas and room widths required within new dwelling and apartment developments. Any proposal on the subject site must be informed by the guidelines. A key area of the guidance contained within the Quality Housing Guidelines relates to the minimum space provision and room sizes for dwellings. It is imperative that all dwellings meet these standards.

It is considered that the proposed development would be consistent with the above standards.

### 5.8 Urban Design Manual – A Best Practice Guide (2009)

The 'Urban Design Manual – A Best Practice Guide 2009' is based on twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are '*a distillation of current policy and guidance and tried and tested principles of good urban design.*'

The Guide states that appropriate density helps support efficient public transport. Low-density districts often find it difficult to support a good public transport system. One of the main arguments in favour of higher-density residential development is their ability to support more sustainable transport modes. Additionally, higher density developments can help to create more compact settlement patterns that help to support walking and cycling.

These Guidelines state that sustainable new housing should make good use of land by increasing densities – where such sites are easily accessible by public transport. Increasing densities near to public transport hubs can significantly reduce reliance on the car. Efforts should also be made to ensure that the location of developments permits access by walking and cycling.

It is considered that the proposed development would be consistent with the above standards.



## 5.9 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions. The RSES outlines the following growth enabler for the Core Region, which includes the hinterlands of the Eastern and Midlands Regional Area.

*‘Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.’*

In the RSES Bray is characterised as a key town that is defined as a ‘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.’

Bray is the largest town in County Wicklow, with a population of 32,600 in 2016, and strategically located at the eastern gateway to the County, with access to the N/M11 corridor (including M50), DART/rail line and quality bus service. It is a strong active town that provides higher order services, including tertiary education, health, cultural and leisure facilities and is a major retail and shopping destination, attracting people from the surrounding towns and villages. While many residents commute to Dublin, there is potential to provide for significant local employment growth for both its residents and its extensive surrounding catchment. Bray is a visitor and tourism destination benefitting from its natural setting on the coast with the backdrop of the Wicklow Mountains.

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 east. 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 (Conna)-Fassaroe, which are within Dún Laoghaire-Rathdown. The delivery of new mixed-use development of Bray Golf course and Harbour Lands will provide for consolidation within the established town.

It is considered that the proposed development would be consistent with the above standards.

## 5.10 Transport Strategy for the Greater Dublin Area 2016 – 2035

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years. The Strategy identifies the challenges for transport in the GDA as being:

- *An assumed return to sustained economic growth;*
- *Substantial population growth;*
- *Full employment;*
- *That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and*
- *That the environment in the GDA is protected and enhanced.*

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such, the objective of the plan is critical to ensuring a functional GDA region.

It is considered that the proposed development would be consistent with the above standards.

## 5.11 Housing For All – A New Housing Plan for Ireland (2021)

The 'Housing for All - A new Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has

*'access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.'*

The plan seeks to increase new housing supply to an average of at least 33,000 new units per year with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the following extract. Pathway No. 3 '*Increasing New Housing Supply*' stipulates a number of key aspects to providing for new homes. It is also noted within that by 2040, an additional one million people will be residing in Ireland. The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. In this context Section 3.1 of the Plan '*Increase Land Availability for Residential Development*' states that:

*'A steady supply of suitable and serviced zoned land is needed' further providing that 'Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.'*

We also make reference to the following objective as included within the Housing For All document:

***Housing Pol Obj 11.2*** *Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.*

In accordance with the above objective, we note the Department of Housing, Local Government and Heritage's publication of the consultation paper for the *Sustainable and Compact Settlements Guidelines for Planning Authorities – Proposed Policy Approach* and the proposed scheme has been developed in cognisance of these new standards.

The provision of residential units within the subject locality supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands which have capacity to comfortably absorb additional development.

The proposed development, as such, responds to a recognised need, at national level, for the provision of residential accommodation in a compact and sustainable manner. The proposal is consistent with policy in this regard.

## 5.12 Design Manual for Urban Roads and Streets (2013)

The proposed development has been designed having regard to the Design Manual for Urban Roads and Streets (2013). The Manual includes guidance and standards for constructing new and reconfigured existing urban roads and streets, whilst also setting out practical design measures to encourage more sustainable travel patterns in urban areas. The internal road network has been designed to deliver security to future pedestrians and cyclists.

The movement function of each of the internal local streets has sought to respect the different levels of motorised traffic whilst catering for a higher number of pedestrians and cyclists. The layout of the roads

enhances pedestrian safety by slowing traffic and making the car subservient to the pedestrian and cyclist. A DMURS Compliance Statement will be prepared in due course as part of a formal planning application.

#### **5.13 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)**

The proposal has had due regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

#### **5.14 Smarter Travel: A Sustainable Transport Future - A New Transport Policy for Ireland (2009)**

The Smarter Travel Plan also states that local authorities should ensure safe walking and cycling routes to and from schools and other educational institutions are identified and implemented. The proposed development complies with the key goals outlined within Smarter Travel: A Sustainable Transport Future.

The location of the site close to public transport routes will ensure good connectivity with the subject site benefitting from the Bray Daly Station is situated 1km from the Site and provides a high-frequency connection into the city centre, north Dublin, Louth and Wexford. Bray Bus Depot lies 800m from the Site and provides connections to the wider Dublin area and beyond.

#### **5.15 Guidelines for Planning Authorities on Childcare Facilities (2001)**

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 no. places for each 75 no. dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

*'In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.'*

As set out on the architectural drawings accompanying this application, the proposed development includes the provision of a creche facility with external play area provided to serve the creche.

The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. However, it is estimated that proposed childcare facilities could cater for in the order of approximately 20 no. children having regard to an accepted industry average of c. 3 to 4sq.m gross floor space per child depending on the type of childcare offered by the end user. This generally complies with the minimum place requirements set out in the abovementioned guidelines. It is envisaged that parents will drop-off children on their way to work within the area or on-route to the public transport linkages available to the proposed development.

#### **5.16 Planning and Development Bill 2024**

It is important to note that the Planning and Development Bill was approved by Cabinet for consideration of the Houses of the Oireachtas on 3rd October 2023. A draft Bill was published in January 2023 following a 15 month review led by the Office of the Attorney General. We note at the time of writing this report the bill has been signed into law on 17th October 2024 has no legal effect until such time as

the provisions have been commenced by the Oireachtas. In a response to a parliamentary question on 22nd October 2024 the minister commented that it will take up to 24 months to commence it in full.

The Bill provides a new and updated legislative framework for the proper spatial planning and sustainable development across national, regional and local levels and ensures that the planning system is focused on both supporting and where appropriate, regulating development on both land and within the maritime area.

In anticipation of the Bill's publication, the following section will provide guidance on the Planning and Development Bill 2024, which may be relevant to the area in which the subject site is located.

- The Bill introduces Urban Development Zones (UDZs) in place of Strategic Development Zones, which were a feature of the Act of 2000. This will empower local authorities to designate areas with significant potential for development, including housing, as Candidate Urban Development Zones and for the Government to designate such areas as Urban Development Zones. These areas will be a focus of State investment in key enabling infrastructure in order to ensure the potential for development can be realised in a timely manner.
- Local authorities will also choose from a range of new area based plans, tailored to different contexts, such as Urban Area Plans for more densely populated areas and Coordinated Area Plans for towns and locations that straddle more than one Local Authority.

## **6.0 Social and Affordable Housing**

### **6.1 Part V, Section 96 of the Planning and Development Act**

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to applications for development in excess of 4 no. dwellings and development of dwellings on land of more than 0.1 hectare. Therefore, the proposed residential development would be required to comply with these provisions. New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1st September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

*'Circular Housing 33 of 2015 of 31 August 2015 - Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.*

*Circular PL 10/2015 and Housing 36/2015 of 30 November 2015 - Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.*

*Guidelines on Application of Part V of the Planning and Development Act 2000, after 1 September 2015, to developments granted permission prior to 1 September 2015, May 2016.'*

The Planning and Development Act 2000 was issued on 28<sup>th</sup> August 2000. Section 96 of the Planning and Development Act 2000 (as amended) states that any development for residential use or for a mixture of residential and other uses shall provide a percentage of the proposed residential units for the purpose of social and affordable housing. The current legislation regarding the transfer of residential units under Part V, as amended by the Residential Tenancies Act of 2014, requires a percentage of units to be transferred to the local authority.

The applicants propose to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for the appropriate percentage of the housing units pursuant to Section 96(3) paragraph (b)(iv) of the Act. If the land has been purchased on or after 1 August 2021, any new planning permissions for housing development on that land will have a 20% Part V requirement, we confirm this applies to the subject site.

The applicant confirms their willingness to enter into an agreement with Wicklow County Council in respect of Part V (Social and Affordable Housing) should a grant of planning permission be forthcoming



at the subject site, in accordance with the relevant provisions of Planning and Development Act 2000 (as amended).

The applicants propose to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for 20% of the housing units pursuant to Section 96(3) paragraph (b)(iv) of the Act. It is submitted that for Part V for the proposed development 21 units of 103 proposed units would be 20.39%.

## **7.0 Conclusion**

It is considered that the subject proposal is compliant with the various quantitative and qualitative standards of Wicklow County Council which seeks to encourage, support, and facilitate residential development subject to the above standards. The proposal is considered to be in accordance with the proper planning and sustainable development of the area.

We trust that this report meets with the requirements of the Planning Authority, and we look forward to discussing the proposal at a pre-planning meeting.



---

Kevin Hughes MIPI MRTPI  
Director for HPDC Ltd.

# TOWN PLANNING SUBMISSION



## Pre-Draft Issues Paper Submission

### Bray Municipal District Local Area Plan 2025

Submitted on Behalf Of:

Benduff Ireland Ltd.

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**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this submission on behalf of our client, Benduff Ireland Ltd. who are the landowners of a site at Bray Waterfront, Strand Road, Bray, Co. Wicklow which forms part of the Bray Municipal District LAP. This submission is made in response to a public notice inviting general submissions to the pre-draft phase of the making of the Local Area Plan for the settlements of Bray, Enniskerry, and Kilmacanogue. Our clients are very keen to collaborate with the Planning Authority in progressing this plan and look forward to constructive engagement in its preparation.

The content of this submission will have regard to the Pre-Draft consultation booklet, together with the provisions of the Wicklow Development Plan 2022-2028 and other relevant National and Regional policy documents. In this context it is noted that the lands at Bray Waterfront, Strand Road, Bray which is located within the Bray Development Boundary.

One of the key themes of the new LAP as set out in the Issues Paper, is Housing, Population and Compact Growth. The paper specifically identifies Bray as a focus for housing/ population growth and states:

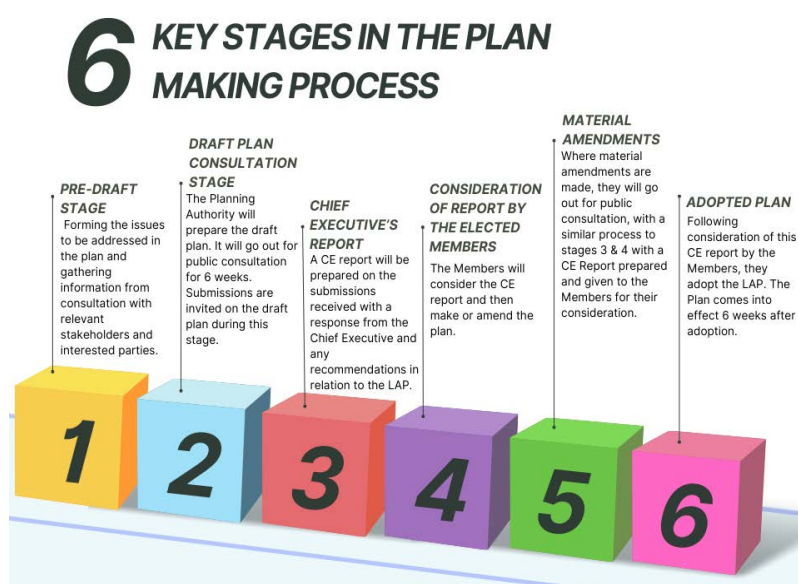
*‘Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet the housing targets set out in the Core Strategy.’*

In this regard, we wish to note and emphasise, this submission seeks to retain the permitted in principle residential use zoning or if a change is to occur to ensure residential is permitted in principle to ensure that high quality residential development is provided within Bray. It is also important to note at the juncture, Hughes Planning and Development Consultants, had been instructed by our clients, Benduff Ireland Ltd, to submit a request for a Section 247 Consultation for a Large-scale residential development (LRD) at the site at Bray Waterfront, Strand Road, Bray, Co. Wicklow. This pre-planning request was submitted on Tuesday 12<sup>th</sup> December and was accompanied by the following documentation:

- Completed Stage 1 LRD Pre-Planning Application Form (18) by Hughes Planning and Development Consultants;
- Planning Report by Hughes Planning and Development Consultants;
- S. 247 Pre-Application Architectural Design Booklet by MCORM Architecture and Urban Design;
- Site Location Map by MCORM Architecture and Urban Design; and
- Landscape Sketch Design by Áit Urbanism + Landscape.

In light of this request for a Section 247 Consultation, this submission seeks for residential use to remain as permitted in principle on our clients lands to ensure that the housing objectives of the LAP are achieved within the lifetime of the plan.

The proceeding sections of this submission will therefore respond to the Key Issues/Questions within the Pre-Draft Consultation Booklet in the context of this overall vision for the site. We welcome the opportunity to contribute to this stage of the plan making process and trust that Wicklow County Council will have due regard to our submission.





## 2.0 Site at Bray Waterfront

The subject site presents itself as a redevelopment opportunity due to the accessibility of a variety of cafés, bars, restaurants, shops, schools and the Bray Institute of Further Education. The site adjoins 'Star Leisure & Casino' to the north and 'Bray Head Hotel,' a Protected Structure, to the south. Bray Head Hotel is currently undergoing renovation works with a large 5 storey extension to the rear. The site has access to a number of public transport routes. Bray Daly Station is situated 1km from the Site and provides a high-frequency connection into the city centre, north Dublin, Louth and Wexford. Bray Bus Depot lies 800m from the site and provides connections to the wider Dublin area and beyond.



Figure 1.0 3D image of subject site (red outline).



Figure 2.0 Image showing the locational context of the subject site (outlined in red).



Given the previously granted planning permission on site (Reg. Ref. 17/359), we would consider there to be scope to introduce a mixed-use development of similar design, scale and mass on the site. Our client has already submitted a request for a Section 247 Consultation for a Large-scale residential developments on the lands. It is encouraged to retain the current zoning designation for these lands in the upcoming Bray Municipal District Local Area Plan 2025.



Figure 3.0 Street view image of the subject site from the north-east (Strand Road).



Figure 4.0 Wider locational context of subject site (red star).

### 3.0 Planning Context

This section of the pre-draft submission will examine the national, regional and local planning frameworks that inform the development of the LAP lands and provide specific guidance in respect of the delivery of housing growth at locations as such. Documents of note include the National Planning Framework (NPF), Housing for All – A New Housing Plan for Ireland, the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), and the Wicklow Development Plan 2022-2028. Each of the afore referenced documents will be discussed below in the context of the forthcoming Bray Municipal District LAP.

### 3.1 Relevant National and Regional Policy Content

#### 3.1.1 Project Ireland 2040 – National Planning Framework

Published in 2018, Project Ireland 2040 – The National Planning Framework is the Irish government's overarching policy initiative which sets a vision and a credible development strategy to shape the country's national, regional and local spatial development in economic, environmental and social terms to 2040. The plan sets out ten National Strategic Outcomes (NSO's) which underpin the overarching vision for the country and serve as shared goals, as depicted in the extract below:

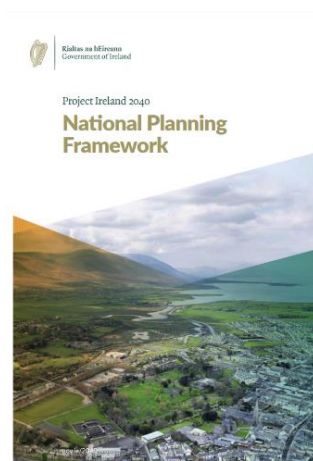


Figure 5.0 National Planning Framework and its National Strategic Outcomes and Priorities of the National Development Plan.

The National Planning Framework is focused on the compact development of existing urban areas to promote sustainable growth and allow for the increased viability of central services, shops and public transport in conjunction with the regeneration of existing built-up areas as opposed to the continual expansion and sprawl of cities and towns into the countryside at the expense of smaller villages. The NPF seeks to manage growth within the three regions of Ireland, which include the Northern and Western, Southern, and Eastern and Midland Regional Assembly areas, to allow for balanced growth and guided development. The following target is outlined in relation to national growth:

*'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'*



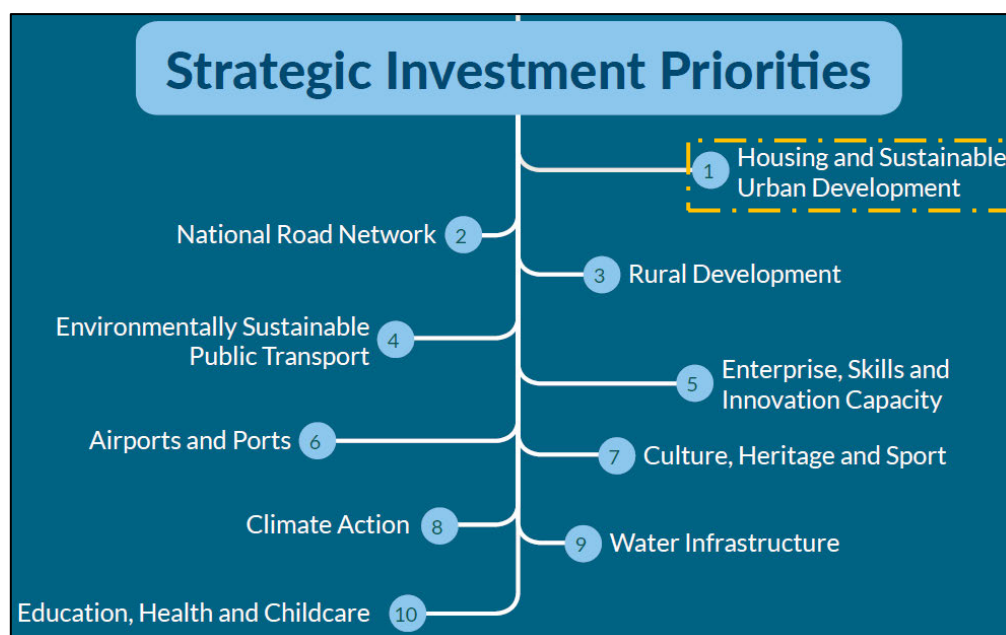


Figure 6.0 National Planning Framework and its National Strategic Investment Priorities of the National Development Plan. Culture, Heritage and Sport is included therein.

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m total)	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)	+160,000 - 180,000 people (1m total) +115,000 in employment (450,000 total)
2. Building Stronger Regions: Accessible Centres of Scale <sup>20</sup>	Dublin City and Suburbs: +235,000 - 290,000 people (at least 1.41 million total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: +105,000 - 125,000 people (at least 315,000 total) Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total) Waterford City and Suburbs: +30,000 - 35,000 people (at least 85,000 total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: +40,000 - 45,000 people (at least 120,000 total) RSES to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

Figure 7.0 National Planning Framework Targeted Pattern of Growth, 2040.

The above table provides a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale is to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units over the coming years, up to 2040 to meet a growing demand.

With regards to managing growth, Section 1.2 of the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of Dublin, Cork,



Limerick, Galway and Waterford are targeted for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth. In addition, National Strategic Outcome No. 1 'Compact Growth', provides that the NPF is focused on the careful management of the sustainable growth of compact cities, towns and villages in order to add value and create more attractive places in which people can live and work. To achieve this outcome, there must be an increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village.

More specifically, strategies included in Chapter 2.2 of the Planning Framework seek to target a greater proportion **(40%) of future housing** development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas, such as BRAY per the following commentary from Project Ireland 2040 document:

*'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. **The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.** The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.*

The Bray Waterfront lands are considered to be under-utilised, with the potential to provide for new residential development. The lands are considered an optimal location to accommodate a number of high quality residential dwellings, providing for a number of additional homes within Bray. It is submitted that the lands have the potential to realise the goals and objectives as set out in the National Planning Framework (2018) by accommodating infill residential development.

A number of objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. We consider that the following national policy objectives to be of relevance:

- |                                     |                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>National Policy Objective 3a</b> | <b><i>Deliver at least 40% of all new homes nationally, within the built up footprint of existing settlements.</i></b>                                                                                                                                                                                                                                   |
| <b>National Policy Objective 3b</b> | <b><i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i></b>                                                                                                                                                  |
| <b>National Policy Objective 4</b>  | <b><i>Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i></b>                                                                                                                                                |
| <b>National Policy Objective 5</b>  | <b><i>Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.</i></b>                                                                                                                                                                          |
| <b>National Policy Objective 6</b>  | <b><i>Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</i></b> |
| <b>National Policy Objective 11</b> | <b><i>In meeting urban development requirements there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to</i></b>                                                                                                                   |

*development meeting appropriate planning standards and achieving targeted growth.*

**National Policy Objective 33** *Prioritise the provision of new homes **at locations that can support sustainable development and at an appropriate scale of provision relative to location***

**National Policy Objective 35** *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.*

**National Policy Objective 73a** *‘Guidance will be developed to enable planning authorities to apply an order of priority for development of land, taking account of proper planning and sustainable development, particularly in the case of adjoining interdependent landholdings.’*

In light of the above, it is considered that the subject lands present an ideal location for development in line with the objectives of the NPF as listed above and the forthcoming development of the lands in the short to medium term should be wholly supported. The provision of a medium density residential development on the subject lands, is in accordance with the NPF’s target of **40% of new housing to be located within existing towns and settlements.**

### 3.1.2 Housing for All – A New Housing Plan for Ireland

‘Housing for All - A new Housing Plan for Ireland’ was published in September 2021 as part of the Irish Government’s ‘Our Shared Future’ programme which, in turn, sets out the Government’s mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has ‘*access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.*’ The plan seeks to increase new housing supply to an average of at least **33,000 new units per year** with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, **Increasing Social Housing Delivery** and Supporting Social Inclusion;*
- ***Increasing New Housing Supply; and***
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the extract overleaf.

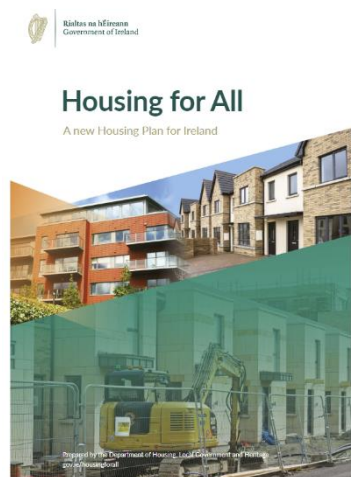




Figure 8.0 Figure indicating the four pathways to Housing for All.

Pathway No. 3 '*Increasing New Housing Supply*' stipulates a number of key aspects to providing for new homes, each of which are depicted in the extract overleaf. It is also noted within that by 2040, an additional one million people will be residing in Ireland. The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. In this context Section 3.1 of the Plan '*Increase Land Availability for Residential Development*' states that '*a steady supply of suitable and serviced zoned land is needed*' further providing that '*Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.*' The plan-led delivery of residential development on the Bray Waterfront lands will provide for a high-quality residential scheme, which integrates with its wider surrounds, and will aid in meeting the residential output requirements as set out within the new *Housing for All* plan.

We submit that the delivery of plan led, residential-led development on the Bray Waterfront lands is consistent with the above policy as it facilitates the provision of an appropriate quantum of residential accommodation on a serviceable site which is within easy reach of essential services and amenities. The provision of residential units on site also supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands, which have capacity to comfortably absorb additional development. The development of these lands will respond to a recognised need, at national level, for residential accommodation and for the growth of our cities and suburbs in a compact and sustainable manner.



Figure 9.0 Figure indicating the pathway to Increasing New Housing Supply.

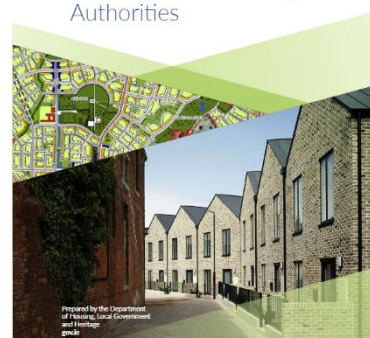
### 3.1.3 Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)

As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements.

Key to these new guidelines is the concept of the 15-minute city. Under said guidelines, settlement types are categorised on their area types and density ranges. Herein, the subject site can be described under the 'Small and Medium Sized Towns'. The key priorities for town growth in order of priority are to:



#### Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities





- a) *strengthen town centres*
- b) *protect, restore, and enhance historic fabric, character, amenity, natural heritage, biodiversity, and environmental quality*
- c) *realise opportunities for adaption, reuse, and intensification of existing buildings and for backland, brownfield, and infill development, and*
- d) *deliver sequential and substantial urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement*

Section 3.3.4 of the Guidelines titled '3 Key Towns and Large Towns (5,000+ population)' provides guidance in relation to the density ranges for such areas and indicates that the strategy is to support consolidation within and close to the existing built-up footprint.

In addition to the above, Section 4.0 of the Compact Settlement Guidelines refers to 'Quality Urban Design and Placemaking' and states that successful placemaking is the outcome of a careful process of consultation, planning, design and delivery that should work in an integrated way. On this basis, the following general steps are recommended to be followed in preparing an urban design framework for an area:

- (i) *Analysis and Appraisal*
- (ii) *Vision and Strategy; and*
- (iii) *Detailed Design*

Following on from the above, a number of Key Indicators of Quality Design and Placemaking are stipulated including:

- (i) *Sustainable and Efficient Movement*
- (ii) *Mix and Distribution of Uses*
- (iii) *Green and Blue Infrastructure*
- (iv) *Public Open Space; and*
- (v) *Responsive Built Form*

Policy and Objective 4.3 thereunder indicates that '*It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.*'

The responses provided in the following sections of this report to the Key Issues/Questions set out within the Pre-Draft Issues Paper will be provided in cognisance of the above criteria.

### 3.1.4 Regional Spatial and Economic Strategy (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which outlines the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. The RSES builds on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs).





As indicated in the below map extract, BRAY is located within the 'Core Region' which includes the peri-urban hinterlands in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow. It is noted that the Core Region contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations, but a wider catchment area. These include towns such as Bray and Shankill. Such towns also have the capacity for continued commensurate growth to become more self-sustaining.

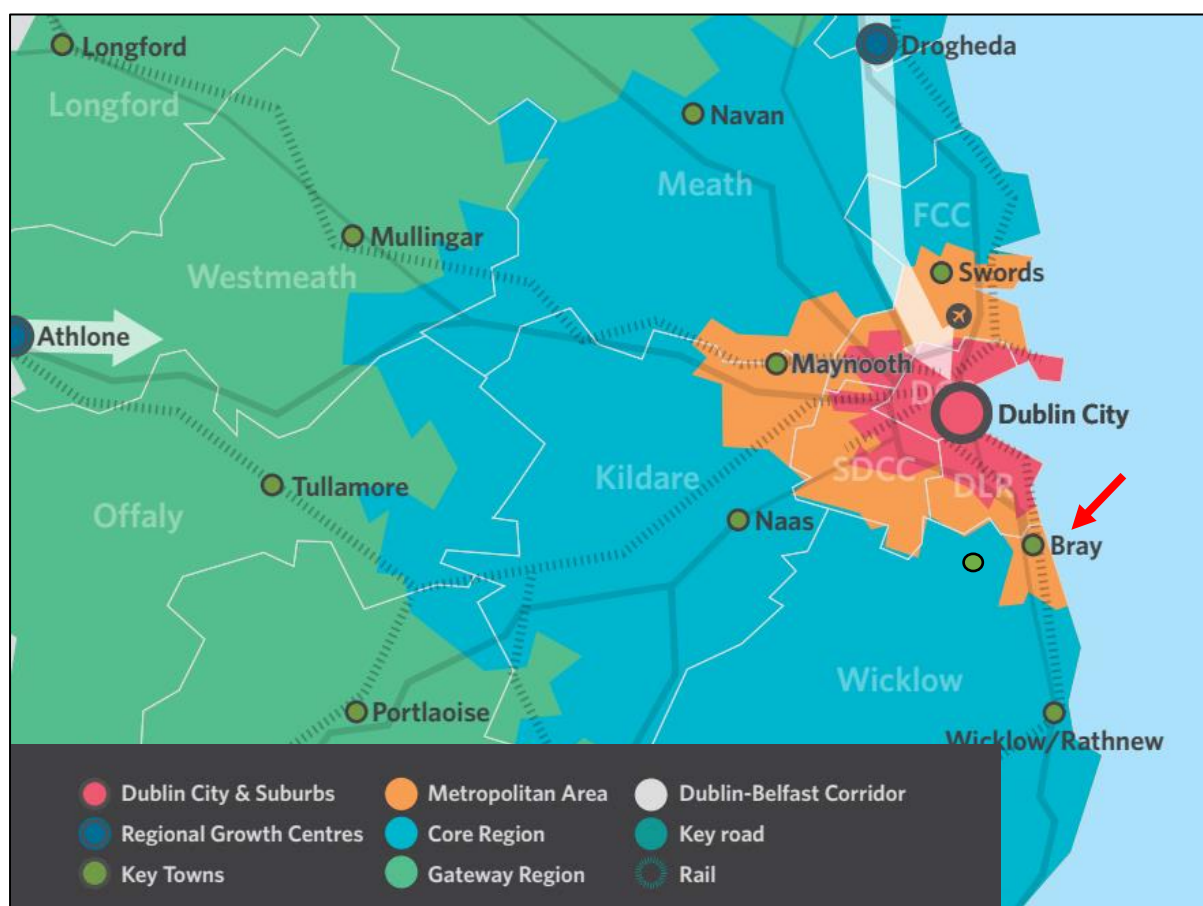


Figure 10.0 Map extract from the RSES indicating the location of BRAY within the Core Area.

It is highlighted within the RSES that in excess of 550,000 people resided in the Core Region in 2016, it is expected that this figure has subsequently increased. It is also indicated that the Core Region contains some of the youngest and fastest growing towns in the state.

The key growth enablers for the Core Region as per the RSES, include the following:

*To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*

*Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.*

In addition to the above, the following Regional Policy Objectives (RPO's) are considered to be of relevance:

**RPO 3.2** *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the*

*built up area of Dublin city and suburbs and a target of at least 30% for other urban areas*

**RPO 4.83** *Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*

The RSES also confirms that local authorities, in developing their core strategies and settlement hierarchies will consider the following growth enablers for every part of the Region to meet its potential including:

*Compact Sustainable Growth – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs, and a target of at least 30% for other urban areas.'*

With regards to the above, it is considered that appropriately developing the LAP lands will aid in securing the compact and consolidated growth of Bray.

We would also note that facilitating housing is critical to ensuring the sustainability, vitality and viability of our towns and villages. Over the past years, Bray has been subject to the sprawl of one-off housing within and outside of its core area. Support for additional housing and compact growth within this settlement will aid in acting as a viable alternative to urban generated one-off housing, contributing to the principle of compact growth.

The RSES identifies Bray under the category of Key Towns and it is stipulated that such towns are 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.

As indicated in the map extract below, the town of Bray is also located along the North-South Corridor, with the DART to Bray, making the area accessible via public transport and further unlocking the development potential of the wider area.

The afore referenced public transport enhancements and improvements will have the effect of providing high quality public transport services to Dublin City and other key towns within South Dublin and the Metropolitan Area. The LAP lands are ideally located to benefit from these improvements and are optimally situated, within proximity to existing and planned public transport services, to meet the key objectives of the RSES which includes the promotion of the compact and sustainable growth of Dublin's Key towns including Bray

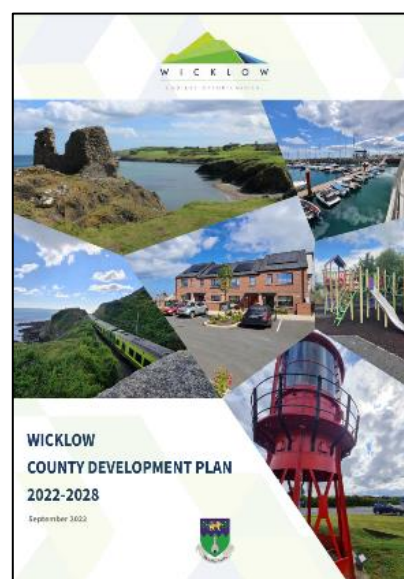
### 3.2 Local Planning Policy Content

#### 3.2.1 Wicklow Development Plan 2022-2028

The Wicklow Development Plan 2022-2028 was adopted by Elected Members on 12<sup>th</sup> September 2022, and came into effect on 23<sup>rd</sup> October 2022.

According to the Wicklow County Development Plan 2022-2028, Bray is a Key town:

*'Bray is the largest town in County Wicklow, strategically located within the metropolitan area and at the eastern gateway to the County. The town has excellent transport links, with access to the N/M11 corridor (including M50), DART/ rail line and quality bus service. It is a strong active town that provides higher order economic and social services for its local residents and for residents from other surrounding towns and villages. Bray is identified as a Key Town in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. These are*



identified 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 indicates that the metropolitan key towns are important in a regional and county context and have the capacity and future growth potential to accommodate above average growth in the Region with the requisite investment in employment creation, services, amenities and sustainable transport. There is significant potential to deliver compact growth and regeneration in the established town centre and built up area.'

The Core Strategy of the Wicklow Development Plan 2022-2028 identifies BRAY as a 'Key Town' with a projected housing demand over the plan period of approximately 4,897 no. units (this figure is less completed units from 2017-2020).

SETTLEMENT		POPULATION & HOUSING				ZONING							
Settlement Type	Settlement name	A Census 2016 Population	B Census 2016 (%)	C Housing Target 2016-2031  (less completed units 2017-2020)  (units)	D Housing Target  (as % of County 2031 target)	E Development capacity of existing zoned lands  (units) <sup>7</sup>	F Development capacity of existing zoned land within built up area  (units)	G Development capacity of existing zoned land outside built up area  (units)	H Development capacity of existing zoned land within built up area as % of total development capacity  (F/E)	I Units required to be provided outside of built up area (units)  (C - F)	J Surplus capacity of existing zoned land outside built up area (units)  (G - I)	K Surplus land outside of existing built up area  (ha)	L Method of addressing shortfall / surplus
County	Wicklow	142,425		11,719	100%								
Key Towns	Bray	29,646	21%	4,897	42%	6,500	2,000	4,500	31%	2,897	1,600	40 <sup>8</sup>	Will be addressed in next LAP – comprises strategic sites
	Wicklow - Rathnew	14,114	10%	1,742	15%	4,200	2,000	2,200	48%	0	2,200	55 <sup>9</sup>	21ha already under construction; remaining surplus will be addressed in next LAP
Self Sustaining (Growth) Towns	Arklow	13,226	9%	1,056	9%	5,200	2,100	3,100	40%	0	3,100	78	11ha already under construction; remaining surplus will be addressed in next LAP
	Greystones-Delgany	18,021	13%	1,078	9%	2,900	1,700	1,200	59%	0	1,200	30 <sup>9</sup>	7.5ha already under construction; remaining surplus will be addressed in next LAP
	Blessington	5,234	4%	514	4%	1,450	300	1,150	21%	215	935	31 <sup>9</sup>	Surplus will be addressed in next LAP

Figure 11.0 Extract of the core strategy table contained within the Wicklow County Development Plan 2022-2028, with Bray outlined in red.

Based on the provisions of the above table, a total housing target for Bray over the plan period of 4,897 no. units is provided (this figure is less completed units from 2017-2020). A potential future proposal of between 80-120 no. units fall to be considered under the 4,897 no. housing target outlined in the Core Strategy table above. The proposed development of 103 no. units would comply with the new housing target figures.

It is submitted that the proposed development of 103 no. units would accord with the above policies and objectives providing for a high-quality residential development at a sustainable density which is appropriate in the context of the site's location in Bray and will support urban compaction and consolidation. The proposal makes efficient use of an otherwise underutilised site and provides for a wide mix of unit types and sizes which will foster the creation of a diverse residential community.

Location	Density Standards
<b>Large Towns<sup>5</sup></b> (Bray, Greystones-Delgany, Arklow, Wicklow -Rathnew and Blessington)	<ul style="list-style-type: none"> <li>Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.</li> <li>Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare.</li> <li>Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.</li> </ul>

Figure 12.0 Table 6.1 of the Wicklow County Development Plan 2022-2028.



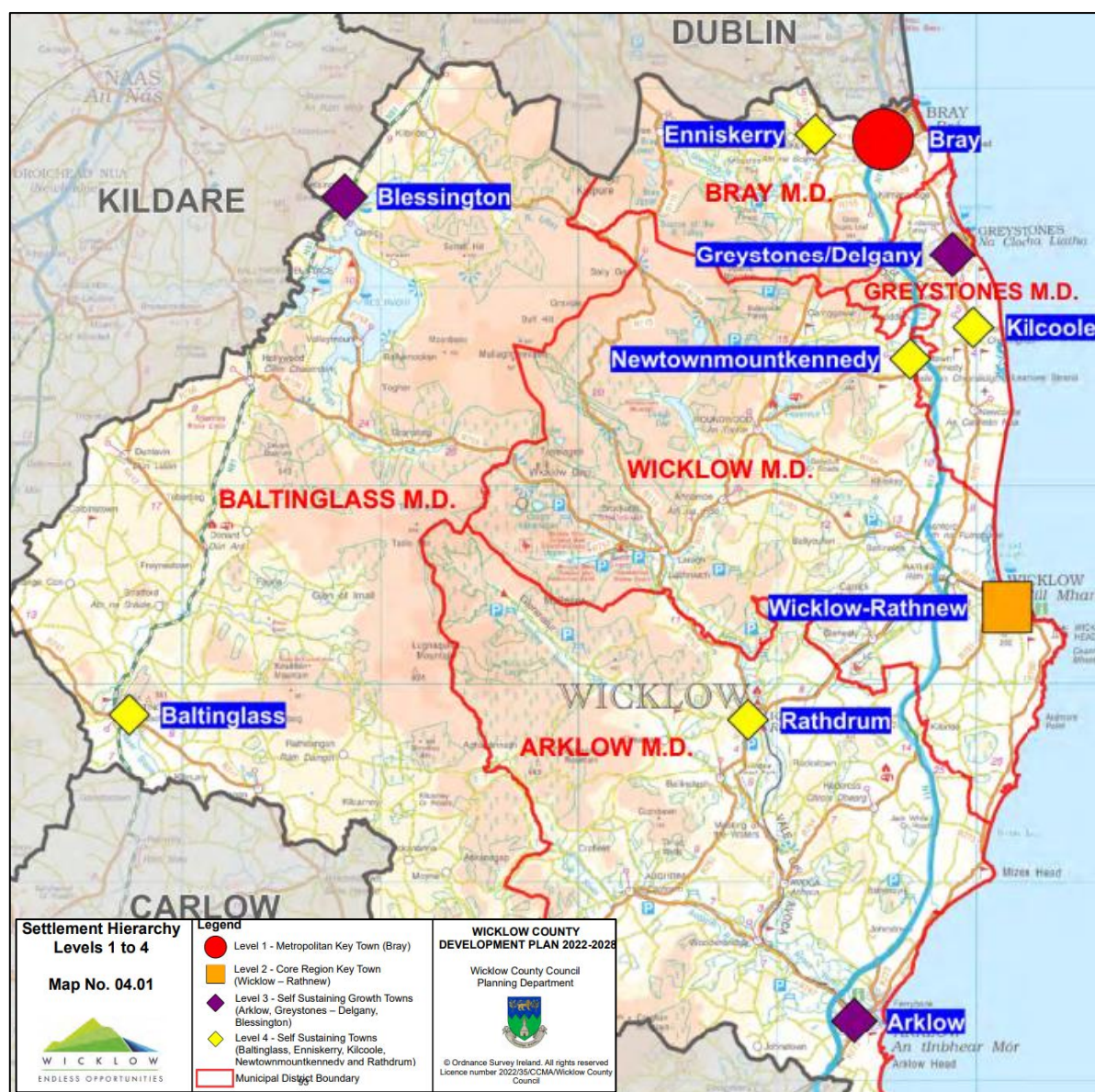


Figure 13.0 Settlement Hierarchy Map from the Wicklow Development Plan 2022-2028, designating Bray as Level 1 – Metropolitan Key Town.

### 3.2.2 Land Use Zoning in the Bray Municipal District Local Area Plan 2018-2024

Referring to the land-use zoning map included in figure 13.0 above, the site is zoned as 'SF Seafront Area'. The objective for this area is to *remain an inviting, animated and attractive seafront area, with a vibrant commercial leisure sector supervised by permanent residences, that functions as the primary tourist, recreational and leisure centre of the town.* The Council will favour high quality developments that serve to attract visitors to the seafront to enjoy the beauty of its natural and manmade physical amenities, the high standard of its services, and its relaxed, pleasant and dynamic atmosphere. In doing so it will thereby contribute towards ensuring a pleasant stay for visitors and garner repeat business through subsequent visits and word of mouth promotion

According to the Local Area Plan, in SF zoned areas, a proposed development will only be permitted where it does not negatively impinge on: (1) the amenity and character of the area; (2) its natural and built heritage; (3) protected views and prospects; and (4) protected structures.

In the SF zone, the following objectives apply:

- The design of new buildings shall draw reference from and complement the historic Victorian style of the seafront; all applications shall be accompanied by a 'design statement' setting out how consideration of the historic character and style influenced the design of the development and how it complements and enhances the area;
- Generally new buildings shall not exceed the 4 storeys height; where a new structure is proposed to exceed the height of immediately adjacent structures by more than 1 storey detailed justification and assessment of impact (visual, overlooking, over shadowing etc) shall be required;
- New buildings will be expected to follow the established building line; where a set back from the road is prevalent, such spaces shall generally be laid out as amenity spaces / gardens rather than car parking, and all efforts shall be made to locate car parking underground or to the rear of new developments; where car parking to the front cannot be avoided, the quantum of spaces shall be minimised, the appearance of hard surfacing shall be ameliorated by use of innovative materials and significant landscaping shall be required;
- It is the overriding objective of the Council to promote the seafront area as the primary tourist, leisure and recreational centre of the town and the quality of residential amenity must be viewed in light of this objective and the long-standing use of this area for leisure activities.

It is submitted that the proposed residential, retail and creche development is acceptable uses with regards to the zoning applying in the subject site.



Figure 14.0 Extract from the Land Use Zoning Map, Site marked with red star.

As a general rule the minimum and maximum density for new residential developments shall be 50 and 150 units per hectare respectively as in Sustainable Residential Development and Compact Settlement guidelines Bray can be considered a metropolitan Town. These densities may not be appropriate in all instances but will serve as a general guidance rule for developers particularly in RE zoning areas. The Council will only allow higher densities up to 150 units per hectare at appropriate sites, typically these will be closer to the town centre area and be well serviced (shops, public transport etc.).

In the SF zoned Seafront area, the following development standards shall apply:

- \* Maximum plot ratio = 2.75
- \* Maximum site coverage = 65%

The granted development would still meet the standards of the Bray Town Plan which allows for a maximum site coverage of 65%. The proposed development would have a site coverage of 39% accounting for the Footprint of the Blocks, Retail and creche and excluding the Undercroft/Terraced



Podium. The site coverage is 78%, including the Undercroft Car Park. The plot ratio With Undercroft is: - 2.48. The plot ratio Without Undercroft is: - 2.03.

Due to the subject site's proximity to public transport corridors, it is considered that a higher plot ratio may be permissible subject to considered, high-quality design.

The Wicklow County Development Plan states:

*'Separate Local Area Plans are in place, which will be reviewed after the adoption of this plan, for the following towns / areas: **Bray Municipal District**, Wicklow Town - Rathnew, Arklow, Greystones – Delgany - Kilcoole and Blessington. These Local Area Plans are reviewed and made under Sections 18, 19 and 20 of the Planning and Development Act, and as such do not form part of the CDP. However, the CDP does provide the key parameters for these Local Area Plans such as the future population and housing targets and sets out the broad strategy for the future economic and social development of these towns.*

So, it is assumed that the amended Bray Land Use Map (Figure 13.0) of the Wicklow is the executive land use map for Bray until the new Local Area Plan is created.

#### 4.0 Basis of Submission

The content of this submission is generally based on the provision of answers to the Key Issues/Questions considered relevant from the Bray Municipal District LAP Pre-Draft Consultation Booklet, in the context of the future timely delivery of development on the subject lands which is appropriately scaled, and in accordance with the key principles of proper planning and sustainable development. We note the relevant themes as follows:

1. *Housing, Population, and Compact Growth*
2. *Regeneration of Communities and Places; Healthy Placemaking; Urban Design; and Opportunity Sites*
3. *Economic Opportunity; Tourism Shops and Services; and Community Facilities*
4. *Heritage, Biodiversity, Green Infrastructure, Climate Action, and Energy*
5. *Infrastructure, Sustainable Movement, and Transportation*

We fully recognise the importance of community involvement in the preparation of the Bray Municipal District LAP and respectfully acknowledge the purpose of this first stage of the LAP preparation process in terms of stimulating discussion on the broader strategic issues relating to the lands.

#### 5.0 Key Themes

For the purpose of convenience and also to help address the relevant key issues, our submission hereunder follows the general layout of the consultation booklet published by Wicklow County Council and seeks to answer the relevant key questions under each of the principal themes.

##### 5.1 Housing, Population, and Compact Growth

Level	Settlement	Population 2016	Population target Q2 2028
1	Bray	29,646	38,565

Figure 15.0 BRAY Population Target 2016-2028 (from the Wicklow Development Plan 2022-2028).

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*The growth settlements within the Municipal District will need new homes built between now and 2031.*

*The focus of growth will be in Bray, with additional growth in Enniskerry and modest growth in Kilmacanogue.*

*To facilitate compact growth, **30% of new homes need to be in the existing built-up area** and town/ village centres. Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet the housing targets set out in the Core Strategy.*

The consultation booklet also includes sample questions for each topic. A suggestion will be provided for the following sample questions:

*Where do we deliver our new housing in Bray and Enniskerry without contributing to urban sprawl?*

Housing delivery should be prioritised in areas that already have established residential development and the necessary transport infrastructure, such as the site at Bray Waterfront in Bray. By focusing on these locations can make better use of existing resources and prevent the expansion of urban sprawl into undeveloped or rural areas. This approach not only maximises the efficiency of infrastructure but also supports sustainable growth by encouraging more compact and well-connected settlements. It aligns with broader urban planning objectives aimed at reducing pressure on peripheral zones. Prioritizing housing in these areas ensures that development is more integrated with public services, reducing the need for extensive new infrastructure investments and promoting a more balanced, sustainable urban landscape.

*Where are the vacant or underutilised sites in the settlement? How can the plan maximise use of these sites?*

The site at Bray Waterfront is currently underutilised, particularly considering that it is surrounded by established residential developments. By developing this site, the overall utility of the land can be maximised, addressing the need for more housing in a location that is already well-connected and integrated into the local community. Delivering appropriate compact housing on this site would not only make efficient use of valuable land but also provide much-needed residential options. This development would help to meet housing needs while respecting the surrounding environment and existing infrastructure, promoting a more sustainable and cohesive community.

## **5.2 Regeneration of Communities and Places, Healthy Placemaking, Urban Design, and Opportunity Sites**

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*The local area plan will focus on the regeneration of the existing built up areas of Bray, Enniskerry and Kilmacanogue in order to achieve more vibrant and sustainable communities. As well as identifying opportunities for development that can give new purpose and function to existing places, sites and buildings, there is a need to address the evolving needs of communities, in response to demographic and lifestyle changes, as well as addressing such issues as over development, decline, etc.*

*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.*

*The **regeneration of vacant sites** has the potential to improve the vitality and viability of the traditional town/village centres and environs.*

It is contended that healthy placemaking through quality urban design should be prioritised in the new Bray Municipal District Local Area Plan 2025. This can be achieved through the development of vacant

sites in existing built-up areas to promote consolidation and benefit from the existing presence of infrastructure and amenities in the area.

### 5.3 Economic Opportunity, Tourism Shops and Services, and Community Facilities

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*There is a need to ensure that there is **enough land zoned** within the settlement to meet the projected future educational, community, sport and recreational uses, in order to meet needs of the future population.*

*While the area is well serviced with schools, community facilities, sport and recreational facilities, the enhancement of these services will be required to accommodate the level of future growth envisaged.*

The new Bray Municipal District Local Area Plan 2025 will be in effect for at least six years. Thus, there must be an adequate amount of land zoned for a variety of uses to ensure appropriate development is permitted in the most suitable place for the use. The provision of an adequate quantity of residentially zoned lands are necessary, as the increase of economic facilities, tourist services, and community facilities will inevitably create an increased demand for residential development.

### 5.4 Heritage, Biodiversity, Green Infrastructure, Climate Action, and Energy

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*The Bray Municipal District area has a rich variety of built and natural heritage. 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.*

*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.*

*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 local area plan will also include an emphasis on reduction in energy demand and greenhouse gas emissions. Management of areas prone to flooding and the coastal zone will also be addressed in the new local area plan.*

The consultation booklet also includes sample questions for each topic. A suggestion will be provided for the following sample questions:

*How do we continue to develop the area while protecting and enhancing its natural heritage and biodiversity?*

*When it comes to land use, what are the key actions we can take to reduce the impacts of climate change?*

In response to the two questions above, both reducing the impacts of climate change and enhancing natural heritage and biodiversity can be achieved by focusing development in existing built-up areas. This approach helps to limit urban sprawl, which in turn reduces the reliance on private vehicles and lowers carbon emissions. Additionally, it prevents deforestation and the removal of plants, as the land is already developed, thereby preserving the local ecosystem and supporting biodiversity.

The site at Bray Waterfront is quintessential to achieve these goals as it is located in an established residential area.

## 5.5 Infrastructure, Sustainable Movement, and Transportation

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*The provision of adequate infrastructure is critical to facilitate and sustain growth. It is acknowledged that Bray is serviced by a broad range of strategic transport infrastructure including the harbour.*

The lands at Bray Waterfront are serviced by a number of public transport routes. Bray Daly Station is situated 1km from the Site and provides a high-frequency connection into the city centre, north Dublin, Louth and Wexford. Bray Bus Depot lies 800m from the Site and provides connections to the wider Dublin area and beyond.

## 6.0 Conclusion

This submission is prepared in response to the publication of the Bray Municipal District Local Area Plan Consultation Booklet published by Wicklow County Council. As significant landowners within Bray, our client, Benduff Ireland LTD., welcomes the opportunity to participate in this stage of the plan making process and look forward to further engagement and collaboration with Wicklow County Council as the Draft Local Area plan progresses in the coming months. As highlighted from the outset of this submission our clients are very keen to develop their lands and have undertaken significant research with respect to this landbank.

In the earlier sections of this submission, our clients indicate that the emphasis of the Bray Municipal District LAP should be on the provision of much needed high-quality homes, complimented by quality open space, amenity areas, local services and facilities. The lands are strategically located and presently underutilised and provide a unique opportunity to facilitate the appropriate growth. The future development of the LAP lands is fully consistent with the provisions of national and regional policy provisions and has the capacity to accommodate of a residential development of 103 no. units. As previously stated, our client intends to submit a planning application for the provision of residential development on the LAP lands of Bray Waterfront and we therefore request retention of the zoning designation for the site in the Bray Land Use Map in the upcoming Bray Municipal District Local Area Plan 2025. We confirm our clients wish to ensure the current zoning to remain in light of our incoming application, or if a change is to occur to ensure residential is permitted in principle.

We confirm a Section 247 Consultation for a Large-scale residential development (LRD) at was submitted on Tuesday 12<sup>th</sup> December have attached the pre-planning documents to ensure that this section is aware we have lodged stage 1 and are actively progressing towards developing residential on these lands.

We trust that the recommendations and commentary included within this submission will be considered by the Planning Authority and we look forward to the publication of the Draft LAP in due course.



Kevin Hughes MIPI MRTPI  
Director For HPDC Ltd.

**Appendix A    Receipt of LRD Stage 1.****Comhairle Contae Chill Mhantáin  
Wicklow County Council****Forbairt Pleanála agus Comhshaol  
Planning Development and Environment**

Áras An Chontae / County Buildings  
Cill Mhantáin / Wicklow  
Guthán / Tel: (0404) 20148  
Faics / Fax: (0404) 69462  
Rphost / Email: [plandev@wicklowcoco.ie](mailto:plandev@wicklowcoco.ie)  
Suíomh / Website: [www.wicklow.ie](http://www.wicklow.ie)

**12/12/2024**

**Benduff Ireland Ltd  
C/O Ms. Louise Kennedy & Muireann Coughlan  
Hughes Planning & Development Consultants  
85 Merrion Square,  
Dublin 2  
D02 FX60**

**RE: LRD S247 Pre-Planning Request for 103 residential units at Site at Bray Waterfront, Strand Road,  
Bray, Co. Wicklow.**

A Chara,

Your pre-application Consultation Meeting Request of 12<sup>th</sup> December refers.

The Planning Authority wishes to inform you that it will not be able to provide a meeting within the 4 week deadline as set out under Section 32 C(1) of the Planning and Development Act 2000(as amended) due to staff availability.

In accordance with Section 32 C (7) the Planning Authority intends to arrange a meeting as soon as is possible.

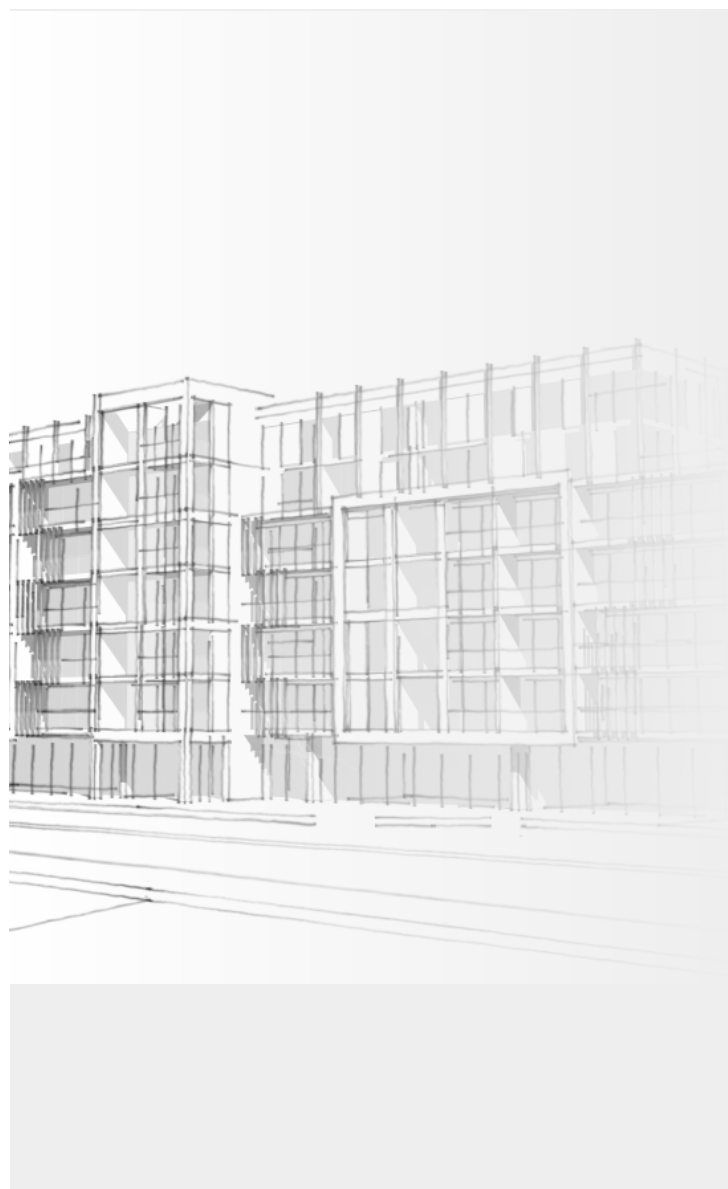
Mise, le meas

  
SENIOR EXECUTIVE OFFICER  
PLANNING DEVELOPMENT AND ENVIRONMENT

*Tá an doiciméad seo ar fáil i bhformáidí eile ar iarratas.  
This document is available in alternative formats on request.*  
Ba chóir gach comhfhreagras a sheoladh chuig an Stiúrthóir Seirbhísi, Forbairt Pleanála agus Comhshaol.  
All correspondence should be addressed to the Director of Services, Planning Development & Environment.



December 2024



## BRAY WATERFRONT | WICKLOW

S.247 PRE-APPLICATION ARCHITECTURAL DESIGN BOOKLET

**Contact**

**T:** 01 478 8700

**W:** [mcorm.com](http://mcorm.com)

**Dublin**

No 1 Grantham Street,  
Dublin 8. D08 A49Y

**Tullamore**

Block 6, Central Business Park,  
Tullamore, Co. Offaly. R35 F8KC

**M<sup>•</sup>CORM**  
ARCHITECTURE  
AND URBAN DESIGN

CONTENTS

- 1. Site Location Map
- 2. Site Information and Photos
  - 2.1 Site Constraints
  - 2.2 Existing Site Sections
- 3. Site Plan Layouts
  - 3.1 Ground Floor Plan
  - 3.2 Typical Floor Plan
  - 3.3 Penthouse Level Floor Plan
- 4. Schedule of Accommodation
- 5. 3d Massing Study
- 6. Proposed Site Sections
- 7.Contextual Study of Facades in Bray Waterfront
- 8. Design Approach
- 9. CGI Image - Artist Impression
- 10. SUDS Strategy

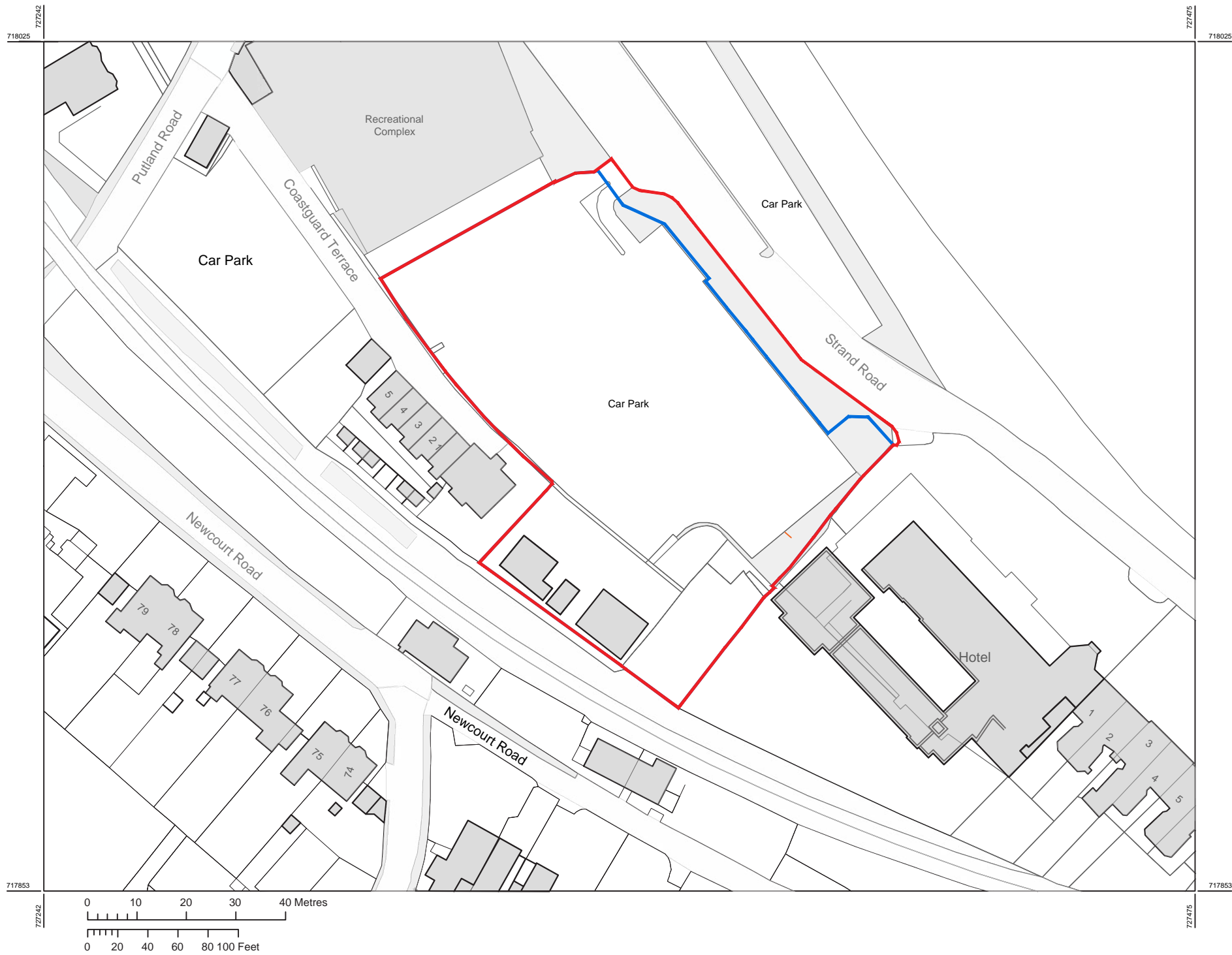
PROJECT DESCRIPTION

- 1. Demolition of 3no Houses and Shed on Coastguard Terrace
- 2. 5-7 Storey Apartment Block including recessed Penthouse on Strand Road, containing 81 apartments, with an undercroft Car Park, Retail and Creche facilities located on Ground Floor.
- 3. Construction of 3-4 Storey Apartment Block including recessed Penthouse on Coastguard Terrace containing 22 total apartments.

DESIGN TEAM

Client	Benduff Ireland
Planning Consultant	Hughes Planning & Development Consultants
Architect	MCORM Architecture and Urban Design
Civil Engineer	Gordon White Consulting Engineers
Landscape Architects/Arboriculture	Áit - Urbanism and Landscape

1 - SITE LOCATION MAP



Map Reproduced under Licence No. CYAL50382541

Map Series:

1:1000

Map Sheets

3568-20

Clip Extent:

LLX,LLY = 727242,717853  
LRX,LRY = 727475,717853  
ULX,ULY = 727242,718025  
URX,URY = 727475,718025

Projection:

ITM

ITM Centre Point Co-ordinate:

X,Y = 727359,717939

Extraction Date:

24-Sep-2024

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Gach cead ar cosnamh.

Ní ceadmhach aon chuid  
den fhoilseachán seo  
a chóipeáil, a atáirgeadh nó a tharchur  
in aon fhoirm ná ar aon  
bhealach gan cead i scríbhinn roimh  
ré ó úinéirí an chóipchirt

Ní hionann bóthar,  
bealach nó cosán a bheith  
ar an léarscáil seo agus  
fianaise ar chead slí.

Ní thaispeánann an léarscáil  
topagrafach seo teorainneacha  
réadmhaoinne dlíthiúla,  
agus ní léiríonn sé úinéireacht  
ar ghnéithe fisiceacha.





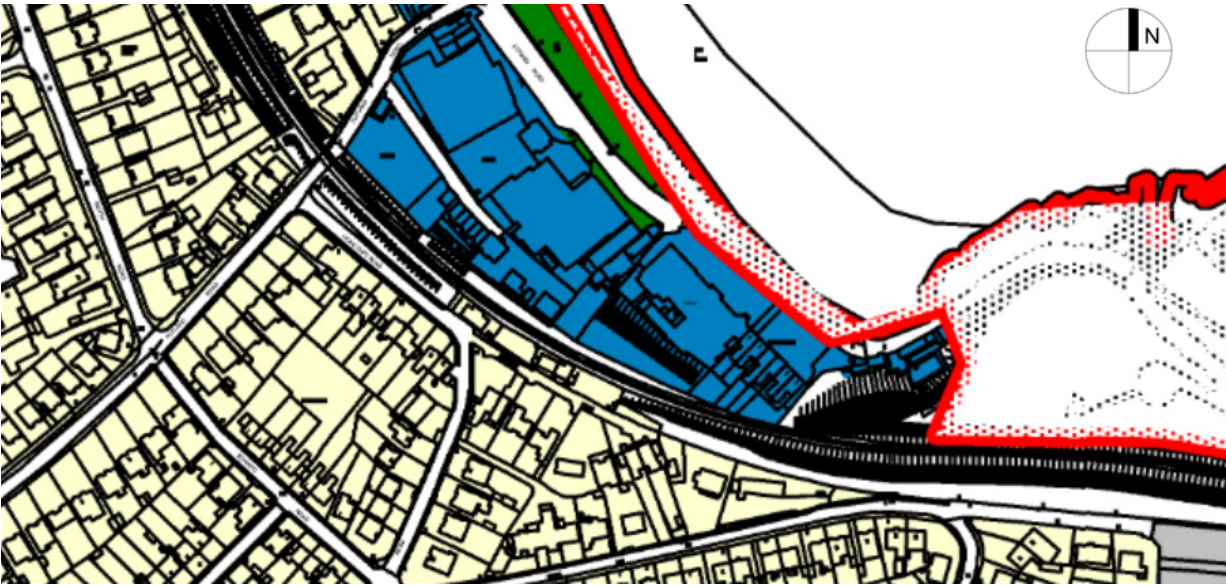
2. SITE INFORTMATION AND PHOTOS

BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018  
Table 3.1 Bray & Environs

LOCATION/DESCRIPTION	AREA (HA)	ZONING	POTENTIAL NO. OF UNITS
AAP1 - Fassaroe	13.89	RE	20
AAP1 - Fassaroe	78.78	R-HD	3,945
AAP1 - Fassaroe	1	NC	75
SLO 1 - Kilruddery	4.3	R20	86
SLO 2 - Rehills – The Slang	3	R-HD	100
SLO 3 - Former Bray Golf Club	9.92	MU	1,000
SLO 4 - Dell	3.75	MU	150
SLO 7 - AO Smith	3.2	MU	120
SLO 8 - Oldcourt House	1.14	R-HD	32
SLO 9 - Bray Southern Cross	2	R Special	80
OP 2 - Former Buckley Heitons, Dublin Road	0.6	TC	120
Bray Head Hotel, Bray seafront	0.3	SF	30
Former Dawson's, Bray seafront	0.42	SF	110
Bray Harbour	1.4	MU	*18
Brook House	1.2	R-HD	60

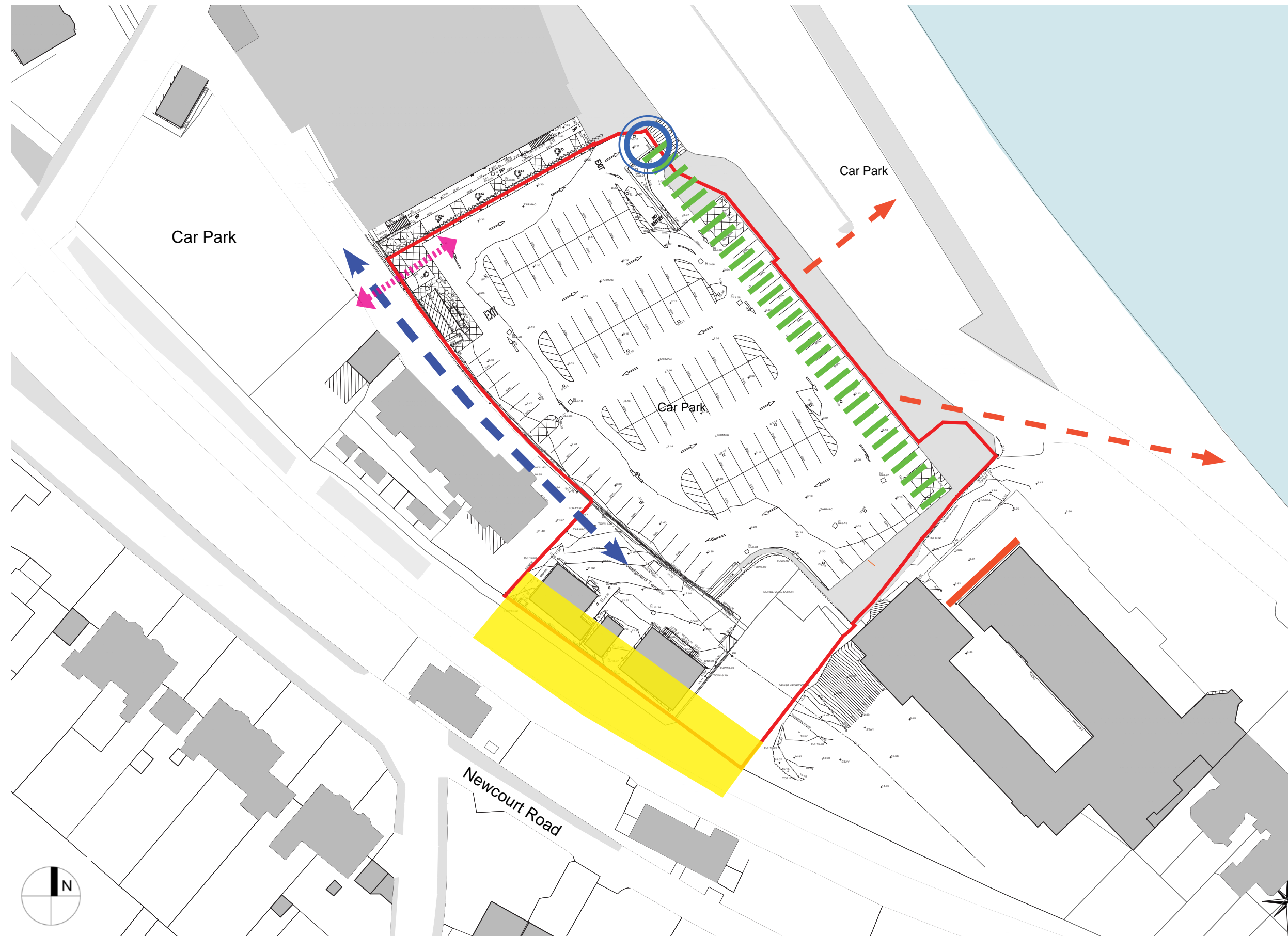
Site Area - approximately 0.56 Hectares

The site is zoned SF (Seafront) as per the latest zoning maps provided by Wicklow County Council. The now defunct Bray Municipal Local Area Plan stated that the “Dawsons” Site had a potential of 110 units, although this LAP has now lapsed, it’s interesting to note the view the council had on the area. With no adopted LAP in place, National Guidelines take precedence which states 150 units per hectare maximum.










## 2.1 - SITE CONSTRAINTS



### LEGEND

-  FOCAL POINT
-  ACTIVE FRONTAGE
-  KEY VIEWS
-  ACCESS ROUTE
-  POTENTIAL OVER-LOOKING
-  POTENTIAL SET BACK FROM RAIL
-  PEDESTRIAN ROUTE

### Access Route to site at the Rear:

Coastguard terrace quite narrow, potential to widen street to allow for fire tender access to rear of site while also improving the streetscape

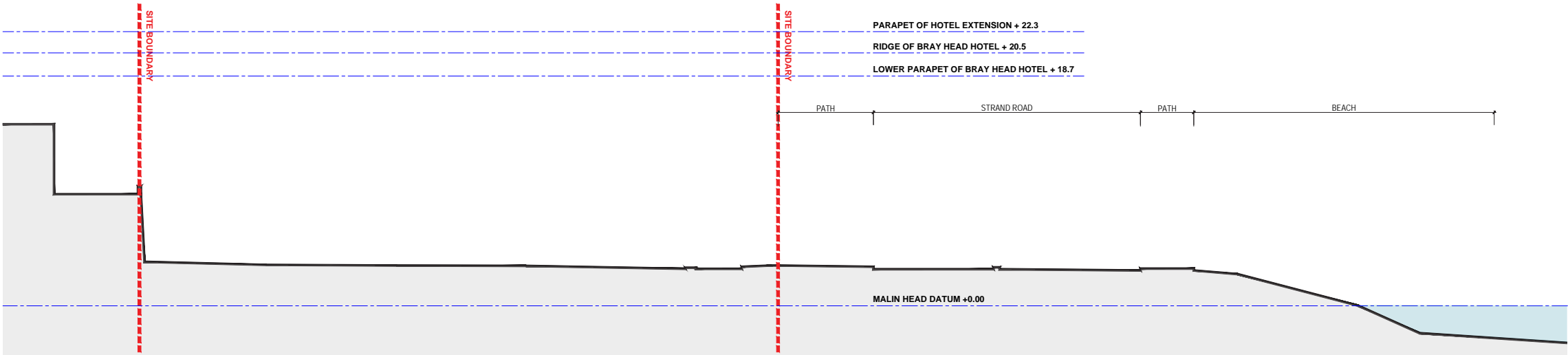
### Irish Rail:

Initial Discussion via phone call with Nick West is he would prefer to keep as far from the rail line as possible, but is open to discussions on this subject to our proposal. Initial Concerns, conveyed surround the Retaining wall currently located in the site. Please refer to Section 2.2 Site Sections for more information

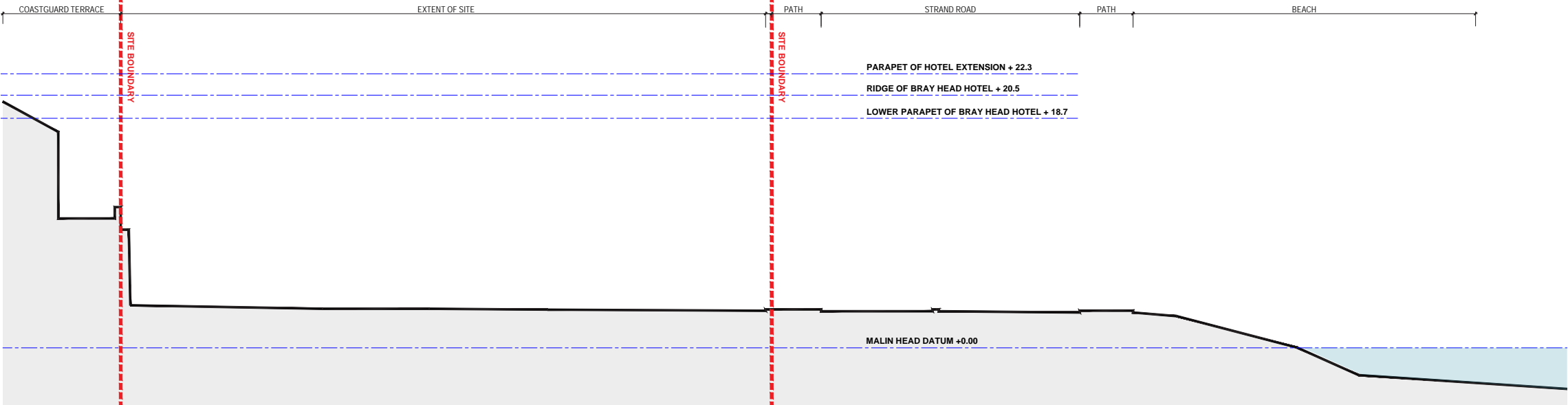
### Hotel Site:

3 no. Windows located on each floor to renovated Hotel indicate habitable rooms. Avoid over looking in this location. New hotel building has AOV from common corridor, more scope available here.

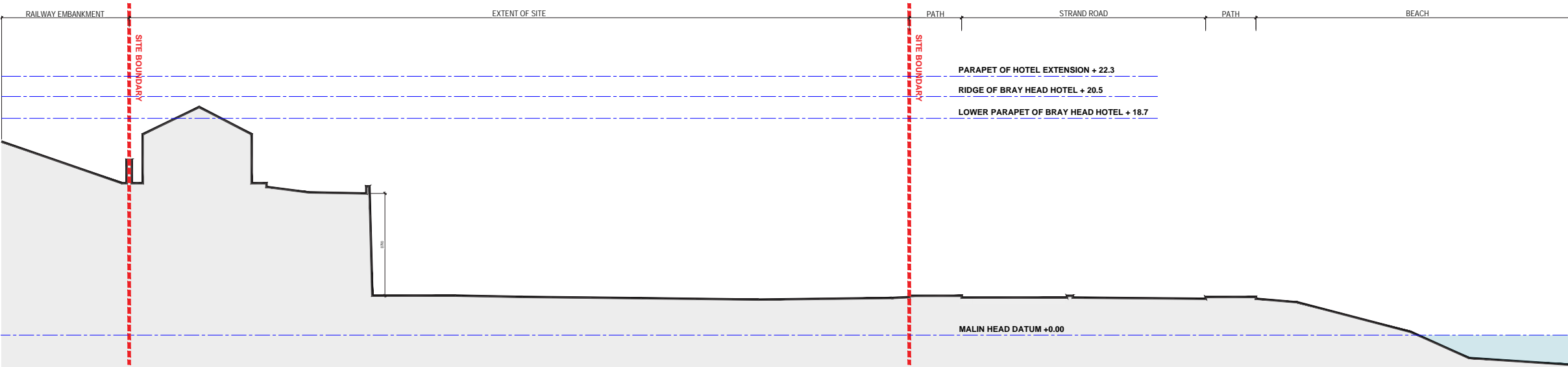
2.2 - EXISTING SITE SECTIONS



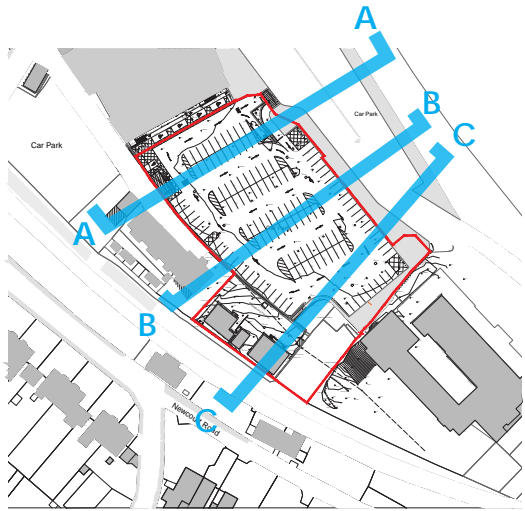
SECTION A-A



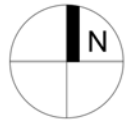
SECTION B-B



SECTION C-C



KEY PLAN



3. SITE PLAN LAYOUTS

3.1 GROUND FLOOR PLAN





3.2 TYPICAL FLOOR PLAN





### 3.3 PENTHOUSE FLOOR PLAN



4. SCHEDULE OF ACCOMMODATION

SITE AREA - 0.56 Hectares

BLOCK A

CAR PARK AREA - 2400 SQ.M

CAR PARKING SPACES - 80 SPACES

RETAIL/CRECHE AREA - 840 SQ.M

PUBLIC OPEN SPACE - 880 SQ.M (15.7%)

COMMUNAL OPEN SPACE - 2560 SQ.M

APARTMENTS

BLOCK A

1 BED - 24 no.  
2 BED - 48 no.  
3 BED - 09 no.

BLOCK B

1 BED - 03 no.  
2 BED - 14 no.  
3 BED - 05 no.

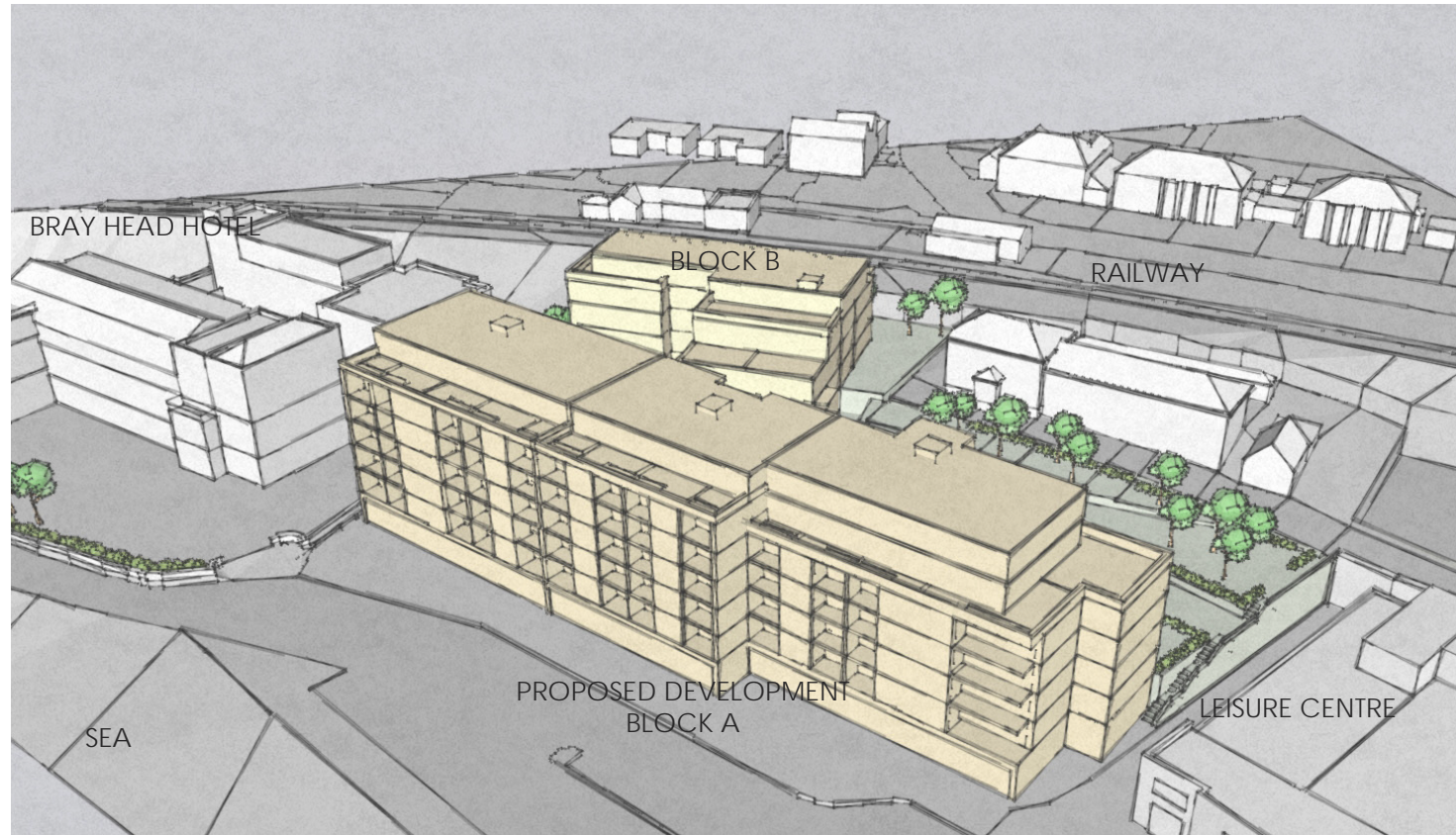
TOTAL MIX

1 BED - 27 no - 26%  
2 BED - 62 no - 60%  
3 BED - 14 no - 14%

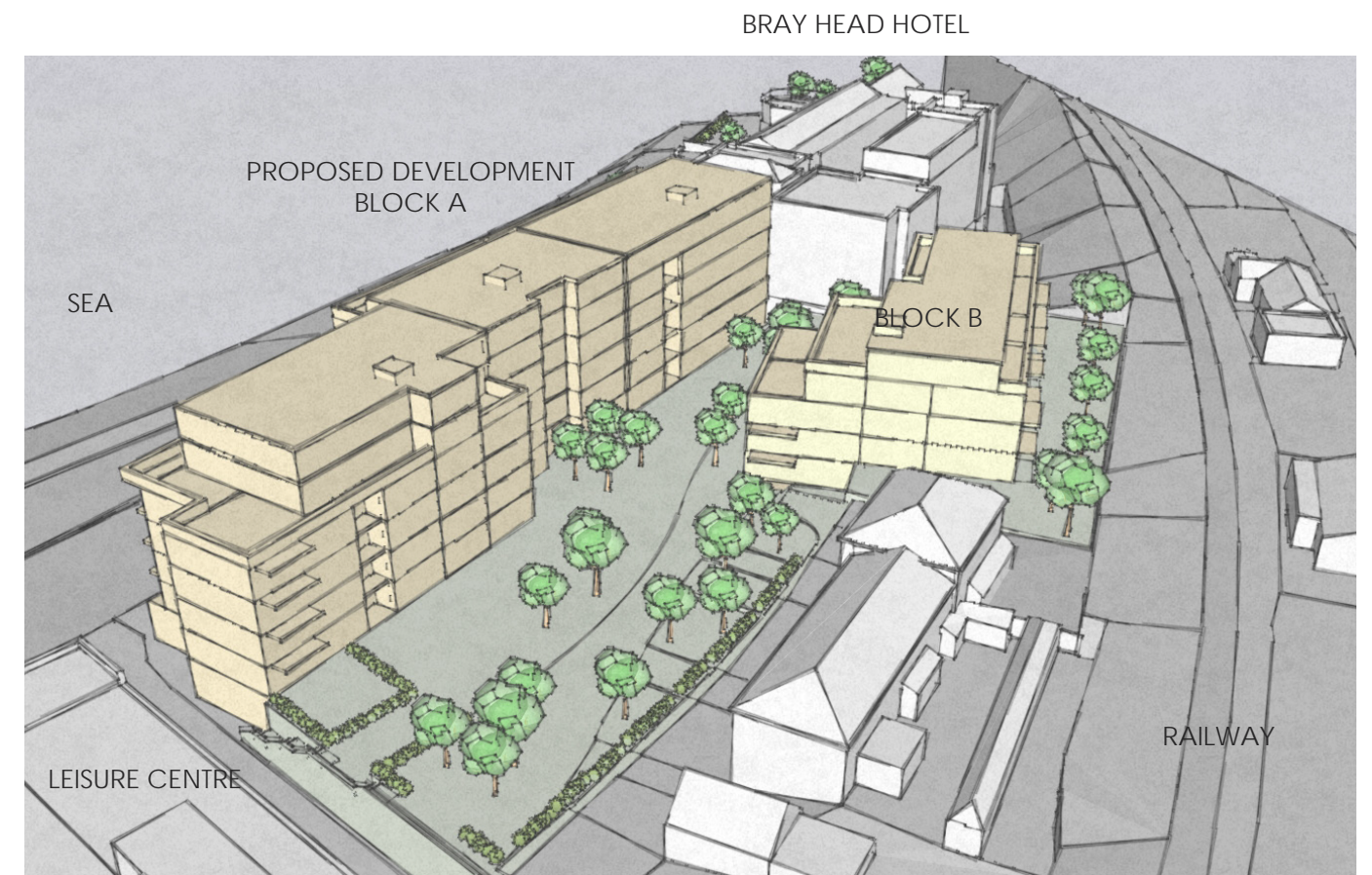
TOTAL UNITS - 103 Units



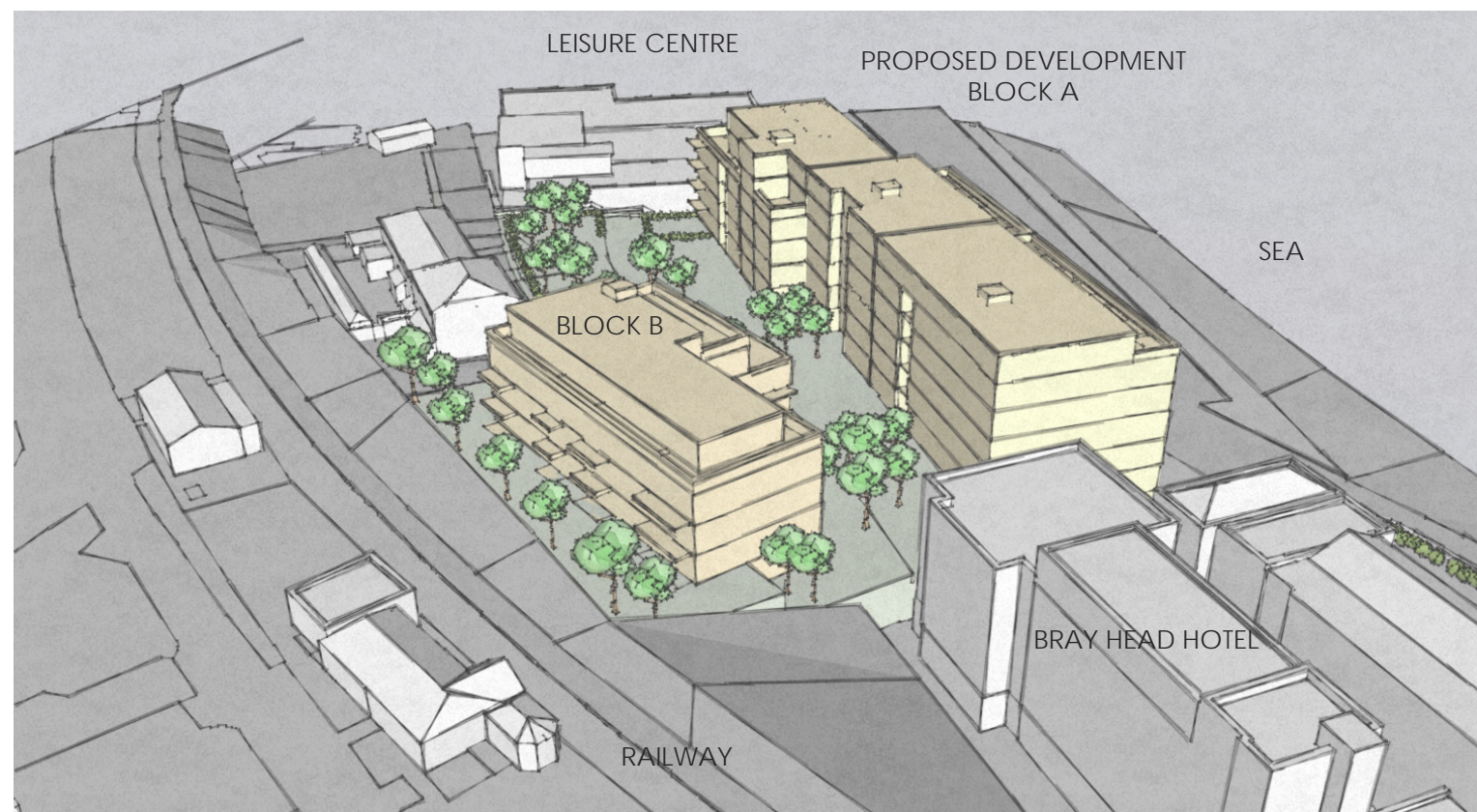
## 5. MASSING STUDIES



3D AERIAL VIEW LOOKING SOUTH

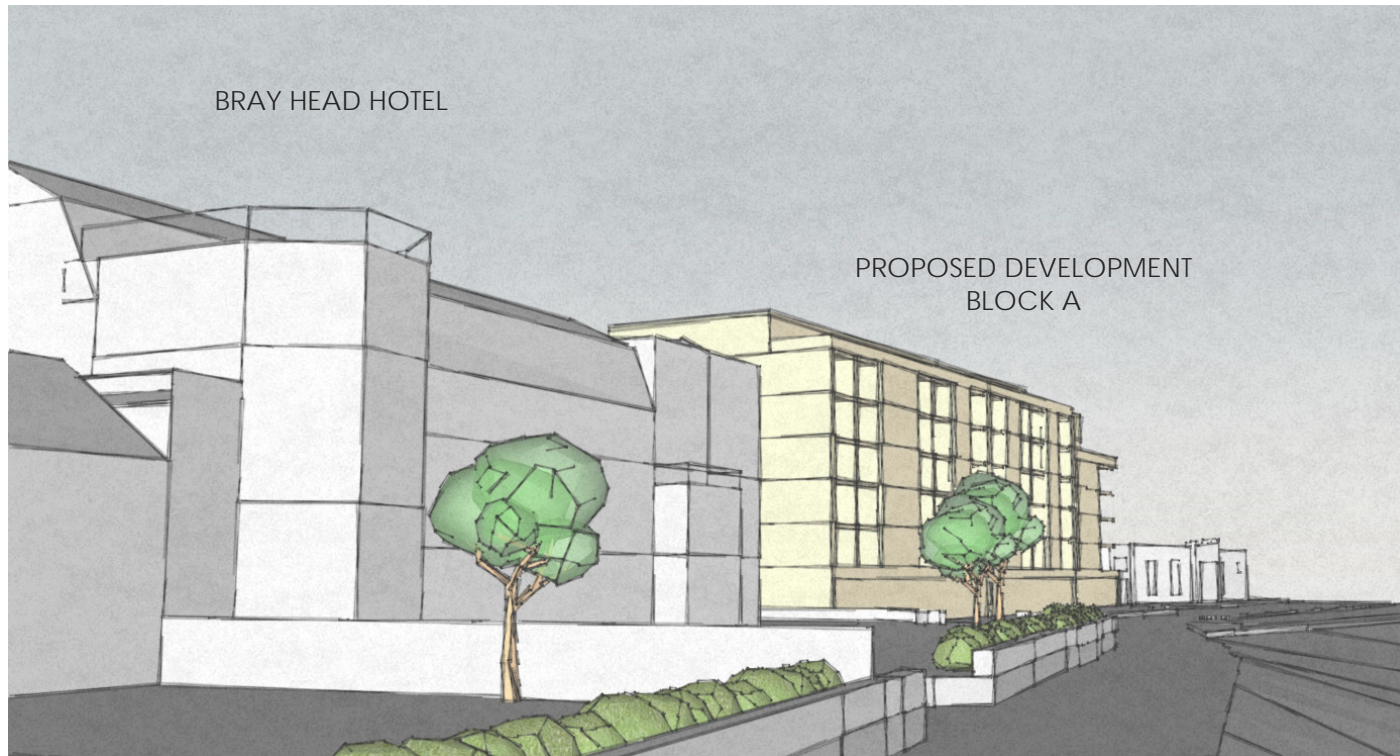


3D AERIAL VIEW LOOKING SOUTH EAST TOWARDS BRAY HEAD

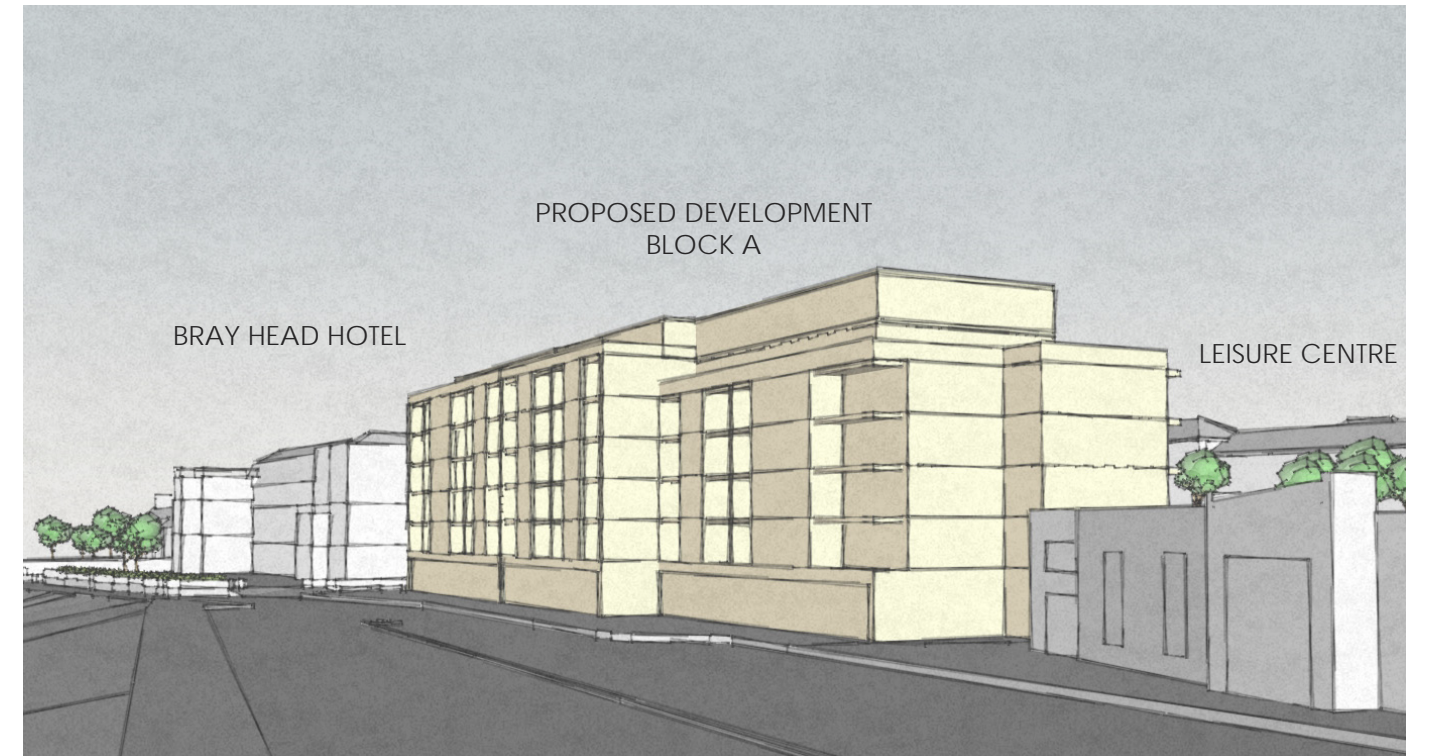


3D AERIAL VIEW LOOKING NORTH ALONG BRAY SEAFRONT

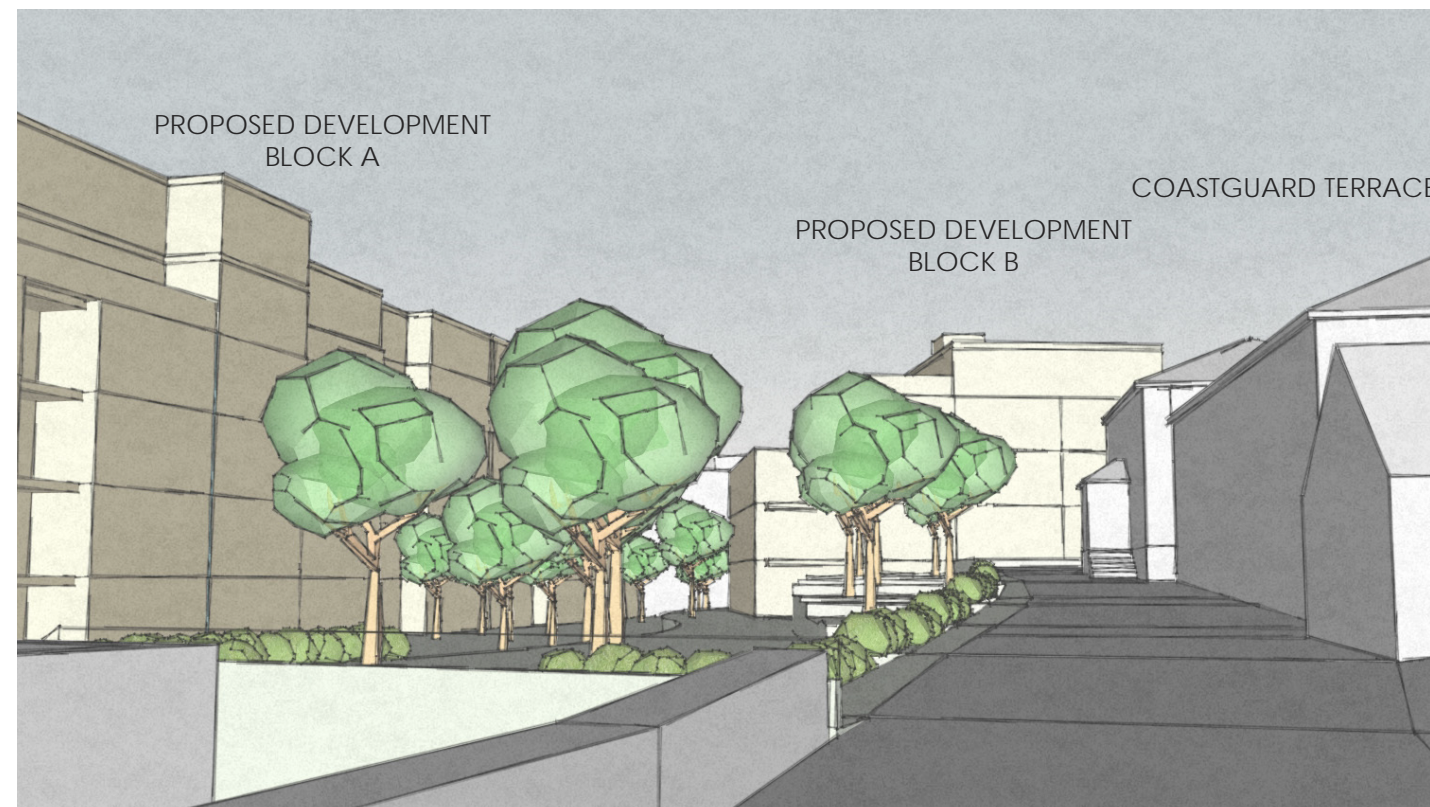




3D VIEW LOOKING NORTH ALONG BRAY SEAFRONT



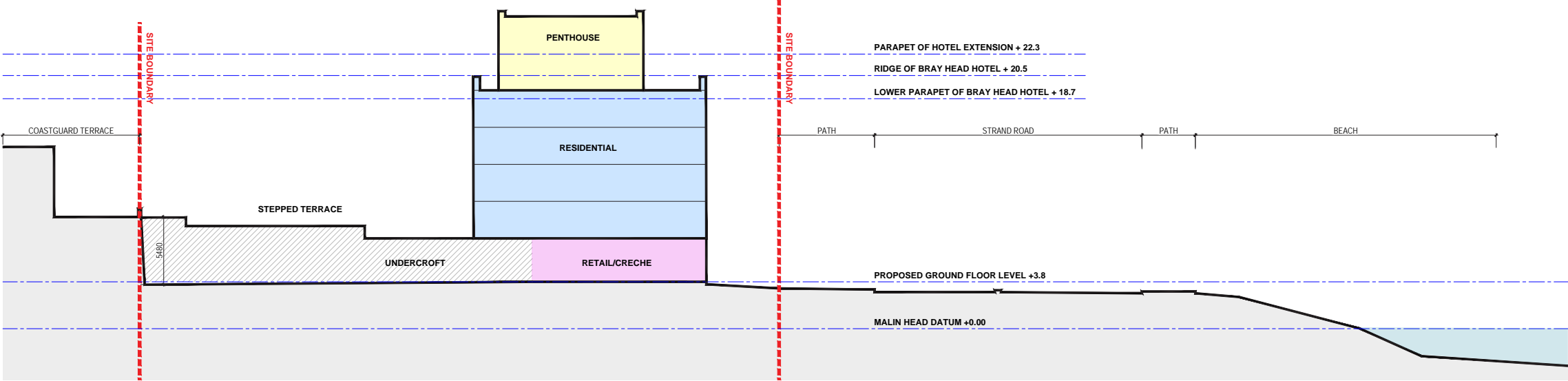
3D MASSING MODEL LOOKING SOUTH EAST TOWARDS BRAY HEAD



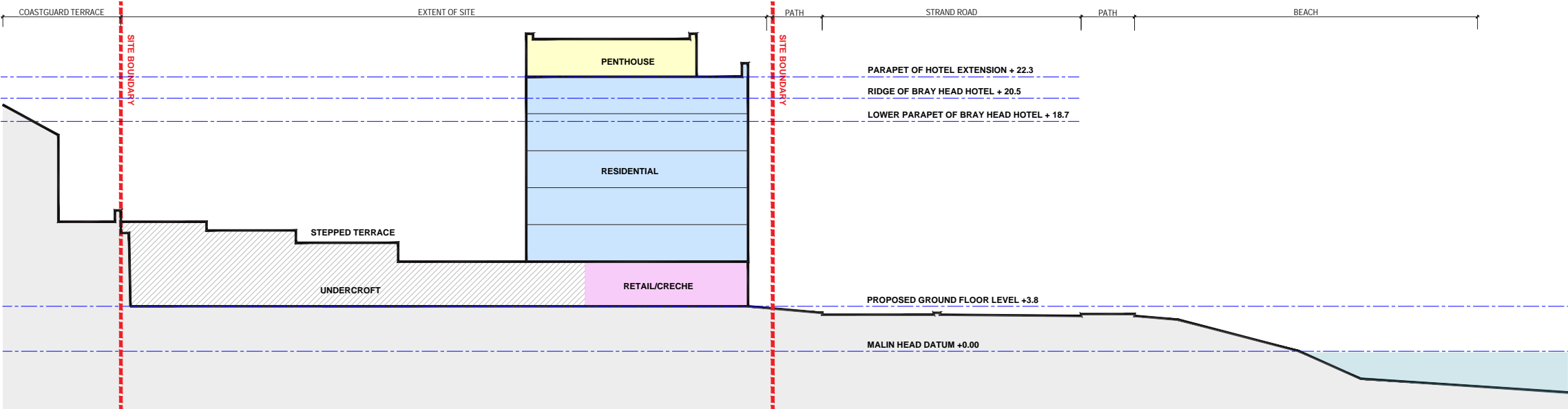
3D VIEW ALONG COAST GUARD TERRACE



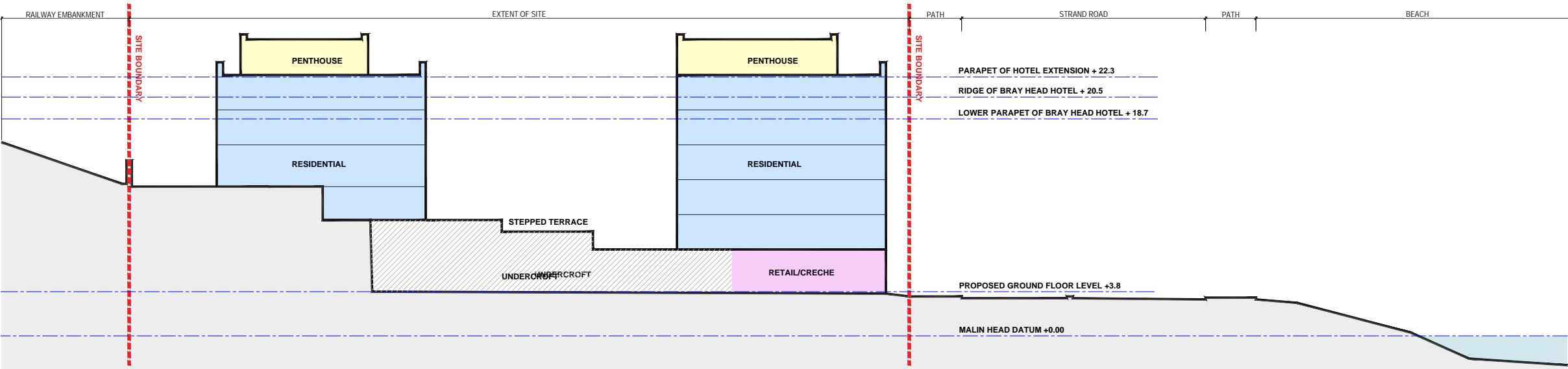
6. PROPOSED SITE SECTIONS



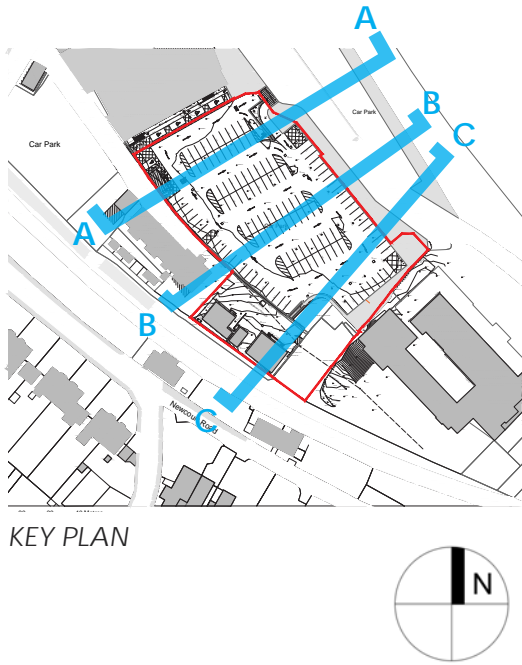
SECTION A-A



SECTION B-B



SECTION C-C





## 7. CONTEXTUAL STUDY OF FACADES IN BRAY WATERFRONT

The use of these key architectural components along Bray Waterfront, creates an established architectural language that is evident throughout the different architectural era's visible along the promenade.

### KEY ARCHITECTURAL EXPRESSIONS ALONG BRAY WATERFRONT

- USE OF VERTICAL ELEMENTS IN FACADE - 2 -3 STOREY BAY WINDOWS
- USE OF TALL WINDOWS OF VICTORIAN PROPORTION
- USE OF URBAN GRAIN - BALANCED COMPOSITION OF UNITS
- USE OF HEIGHT ALTERNATING HEIGHT TO PROVIDE RELIEF AND ARCHITECTURAL INTEREST
- ASYMMETRICAL END PIECES PROVIDING VISUAL INTEREST



VERTICAL ELEMENTS IN FACADE



CONSISTENT PROPORTIONS USED THROUGHOUT  
ESTABLISHING A FINE URBAN GRAIN



USE OF HEIGHT TO PROVIDE RELIEF AND  
ARCHITECTURAL INTEREST



ASYMMETRICAL END PIECES





## 8. DESIGN APPROACH

The design approach has been developed using the architectural language established on the sea front, as set out in the previous section. The key elements were identified and then used to establish a respectful and modern approach which aim's to integrate a high quality modern design with the historical language in which the site sits.

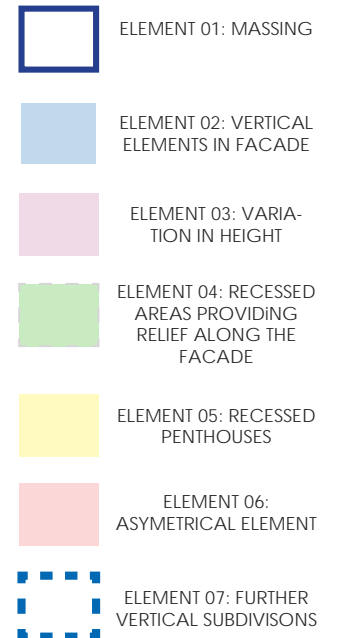
As outlined in the previous section, establishing an urban grain was essential. The urban grain provides the building with an appropriate architectural rhythm suitable to the scale of the building and its surroundings and creates a balanced composition.

*The use of vertical frame-like elements in the facades allows this proportion to be easily identifiable in contrast to the recessed balcony areas. Within the larger vertical elements, further vertical subdivisions are implimented to excentuate the proportions and reference the tall Victorian style windows seen along the waterfront.*

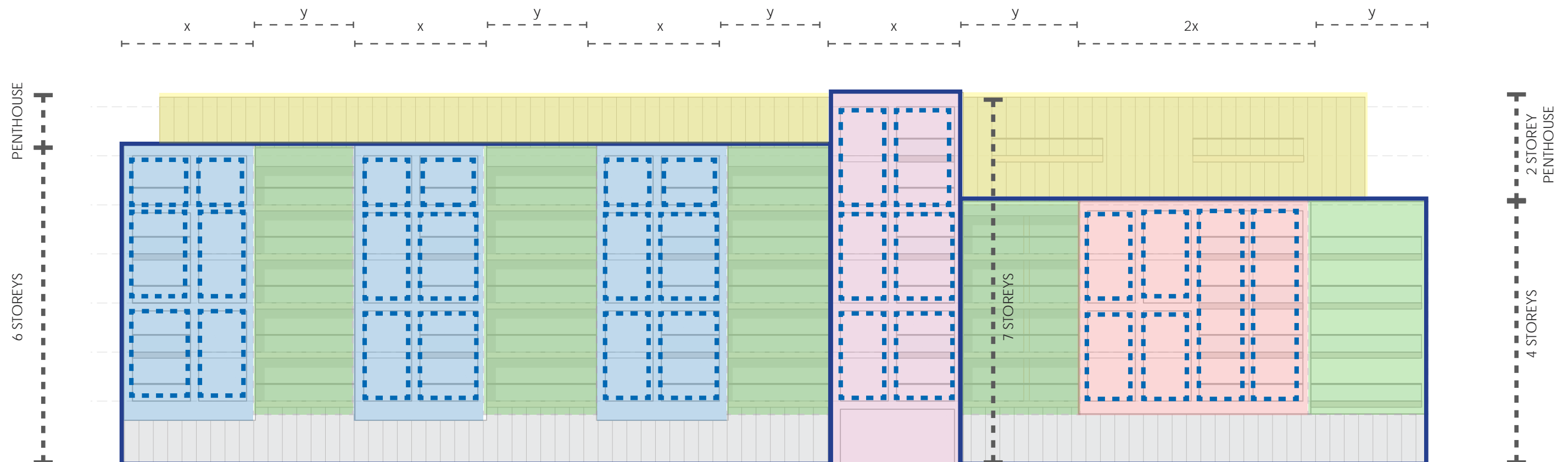
*Alternating the height at a key area of the building provides relief along with the recessed penthouses acting as an anchor point for the scheme.*

### KEY ARCHITECTURAL EXPRESSIONS ALONG BRAY WATERFRONT (extract from section 5.0)

- USE OF VERTICAL ELEMENTS IN FACADE
- USE OF TALL WINDOWS OF VICTORIAN PROPORTION
- USE OF URBAN GRAIN - BALANCED COMPOSITION OF UNITS
- USE OF HEIGHT ALTERNATING HEIGHT TO PROVIDE RELIEF AND ARCHITECTURAL INTEREST
- ASYMMETRICAL END PIECES PROVIDING VISUAL INTEREST



### ESTABLISHING AN URBAN GRAIN BASED ON APPROPRIATE PROPORTIONS



9. CGI - ARTISTS IMPRESSION





## 10. SUDS STRATEGY

The site as it stands, is almost entirely impermeable with large areas of hardstanding in both the upper site along Coastguard Terrace and the Lower Car Park Site. The current drainage systems in place, discharge almost directly to open sea but nonetheless we propose to control / reduce discharge through the use of green / blue roof & deck finishes. Furthermore a landscaped area to the rear of Block B will provide some natural drainage to the rear of site. All of which when implemented will provide relief to the current infrastructure.



SITE PHOTOS - CAR PARK



SITE PHOTOS - COASTGUARD TERRACE



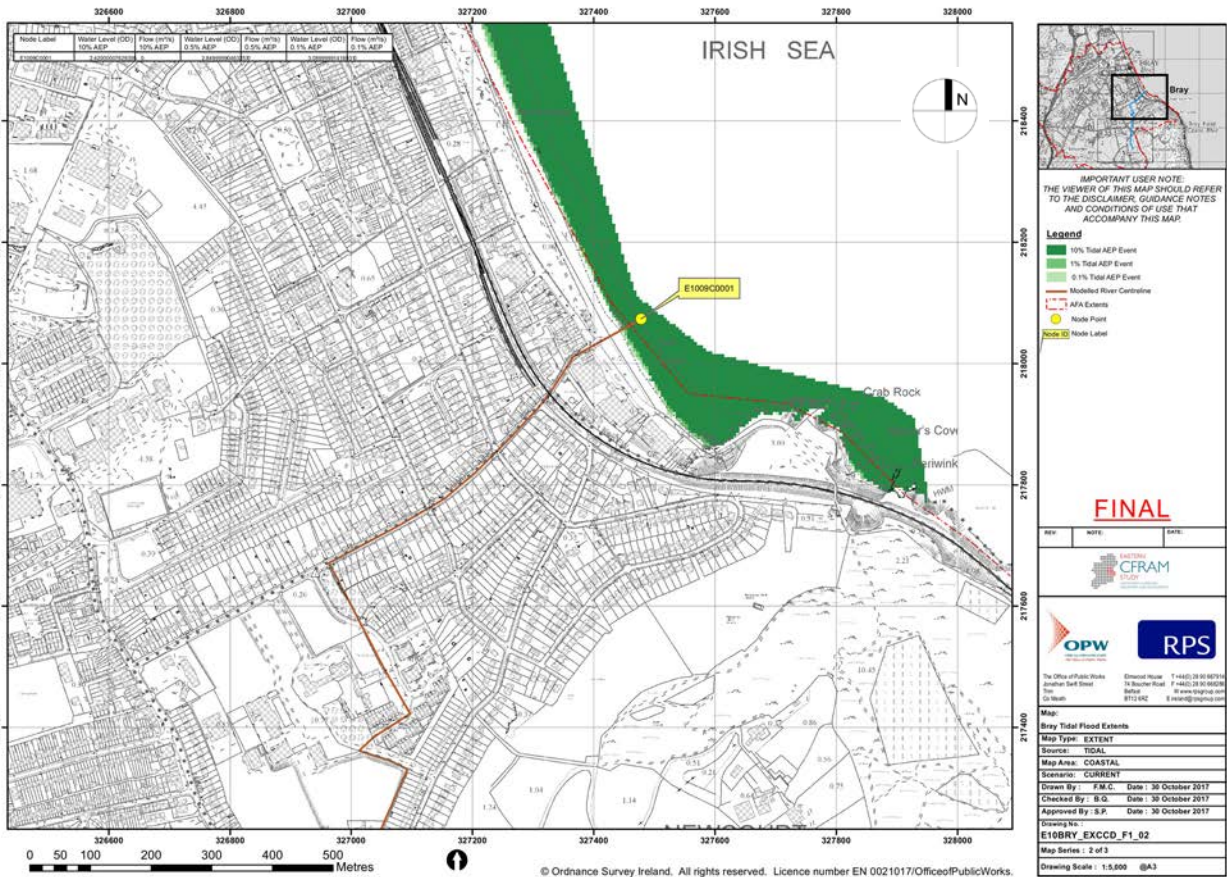
SITE PLAN LAYOUT SHOWING GREEN ROOF AREAS AND BLUE ROOF PODIUM



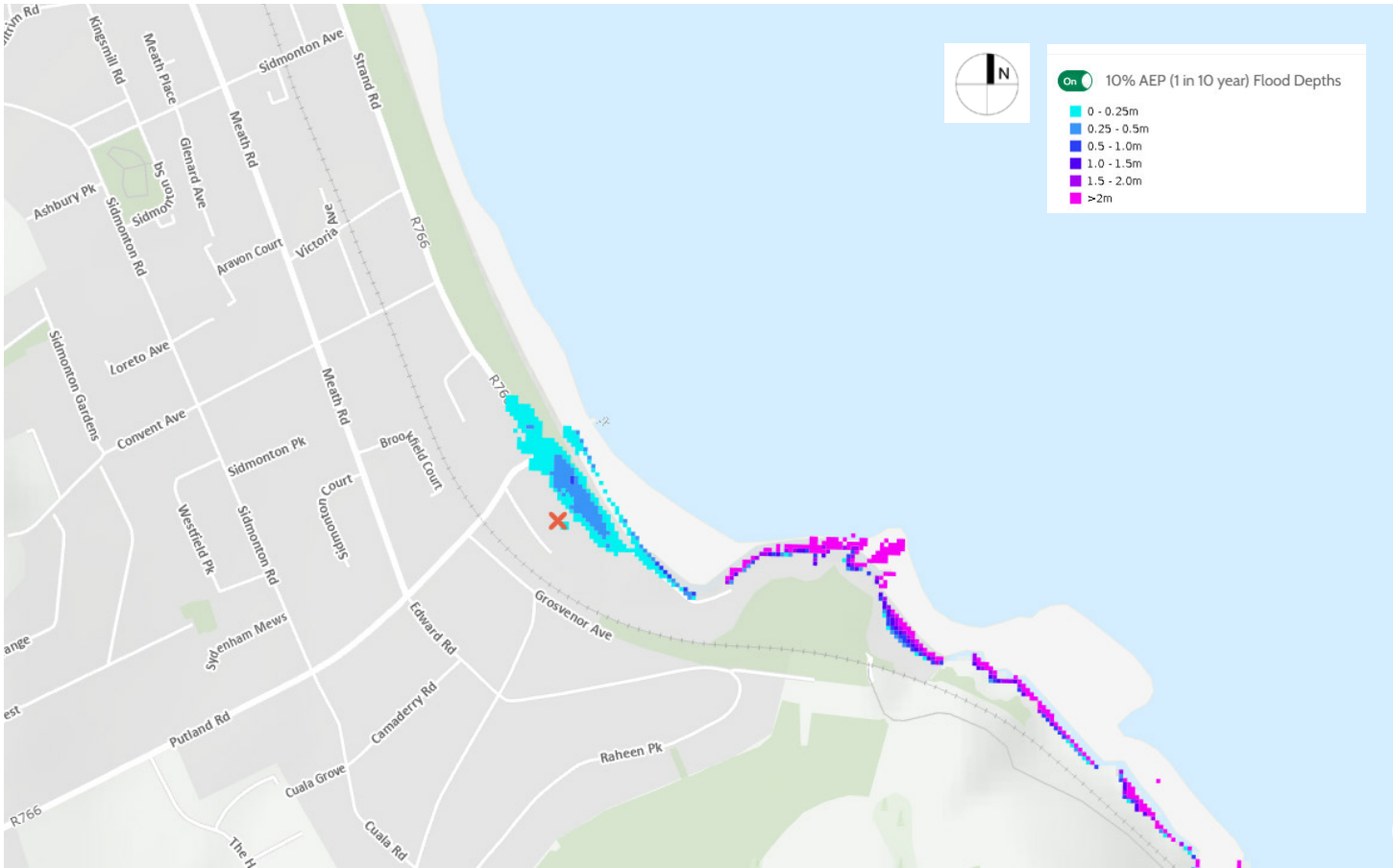
# 11. INITIAL FLOOD RISK STUDY

The site currently sits above the current high tide level and when looking at the projected sea levels, we are above the mid-range 10 year tidal level. The Ground Floor level will also be set above the projected 1000 year fluvial flood level.

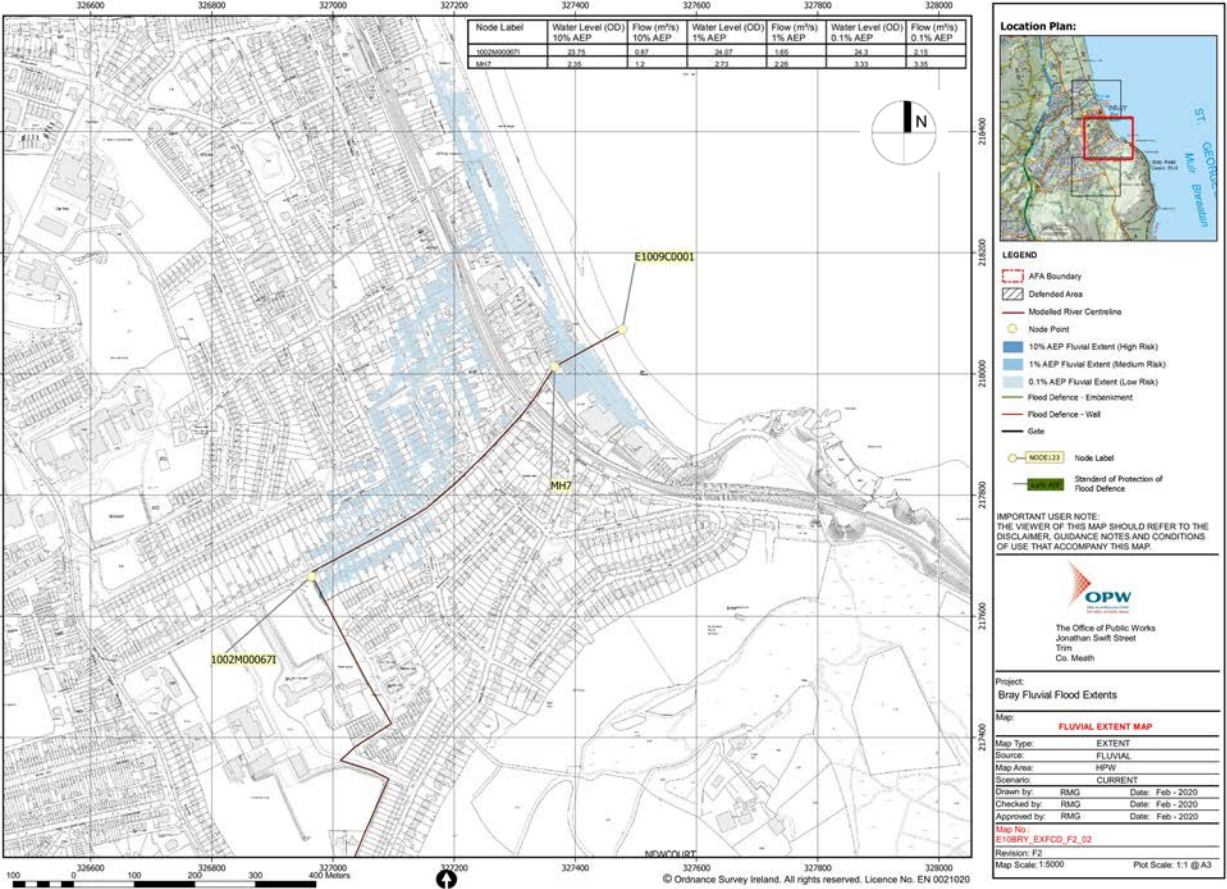
The current proposal has provided residential accommodation to the first floor and above, mitigating flooding to any residential units on the site.



Bray Tidal Flood Extents Map



National Coastal Flood Hazard Mapping 2021 - Mid-Range Future Scenario



Bray Fluvial Flood Extents Map

