



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Parmont Ltd
Reference:	BRAYLAP-130242
Submission Made	December 18, 2024 1:05 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please refer to attached Pre-Draft Bray LAP 2025 submission, prepared by Tom Phillips + Associates on behalf of Parmont Ltd., in respect of lands at the Esplanade Hotel, Strand Road, Bray, Co. Wicklow.

File

Lands at Esplanade Hotel - Submission to Pre-Draft Bray LAP 2025.pdf, 1.39MB

Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Wednesday, 18th December 2024
[Submission via Consultation Portal.]

Dear Sir/Madam,

RE: PRE-DRAFT CONSULTATION BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2025: SUBMISSION IN RESPECT OF LANDS ADJACENT TO ESPLANADE HOTEL, STRAND ROAD, BRAY, CO. WICKLOW.

1.0 INTRODUCTION

Tom Phillips + Associates¹ have been retained by Parmont Ltd.² to prepare this submission to the *Pre-Draft Consultation for the Bray Municipal District Local Area Plan 2025*, in respect of lands adjacent to the Esplanade Hotel, Strand Road, Bray, Co. Wicklow.

This submission has been made before the consultation period closes on Wednesday, 18th December 2024.

Our Client is the owner of these lands at the Esplanade Hotel, Strand Road, Bray, Co. Wicklow. The site is located within the Local Area Plan boundary, within the eastern portion of the 'Bray Town and Environs' area.

1.1 Executive Summary

This submission has regards to the recently published *Bray Municipal District Local Area Plan 2025 Pre-Draft Booklet*, which outlines the need for additional residential development within the Bray Municipal District between now and 2031. The Pre-Draft Booklet identifies that 30% of new homes need to be in the existing built up area and town/village centres, to facilitate compact growth.

This need for additional housing in Bray is reflected in the relevant national, regional, and local planning policy. These policies and guidelines, as outlined in this submission, also highlight that an emphasis should be placed on the development of new housing within the built-up footprint of existing towns and cities, through compact growth. They also highlight the importance of the provision of infill development and regeneration of underutilised sites.

¹ 80 Harcourt Street, Dublin 2, D02 F449.

² Esplanade Hotel, Strand Road, Bray, Co. Wicklow.

Our assessment of the lands identified for new residential development in the *Bray Municipal District Local Area Plan 2018-2024* (2018 LAP), shows that the vast majority of these lands were not brought forward for development over the lifetime of the plan, with only a small number having sought planning permission for redevelopment during this period. We highlight that the majority of lands zoned for new residential development in the settlement of Bray was located within Fassaroe, with Policies in the 2018 LAP noting that major infrastructure provisions and upgrades are required to unlock the development potential of these lands. To date, these infrastructure interventions do not appear to be in place. We further highlight that no surplus of land was zoned for residential development in this LAP, therefore, all zoned lands would need to be redeveloped during the life of the Plan to ensure the housing targets contained therein are met.

We contend that the housing targets for the 2018 LAP are unlikely to have been met, based upon a planning history search of the relevant sites, and, therefore, the new LAP will have to account for this when determining the new housing targets for the forthcoming *Draft Bray Municipal District Local Area Plan 2025* (the Draft LAP). We, therefore, contend that additional land will be required to be zoned for new residential development as part of the forthcoming Draft LAP, to account for the potential deficit carried over from the 2018 LAP period.

Whilst the need to protect the tourist character of Bray Seafront is important, we contend that the Policies and Objectives contained within the 2018 LAP in relation to this area are restrictive with regard to any land use other than tourism, with no mention of new residential development in this area, other than those specific sites identified for this use. We would welcome an expansion of these Policies and Objectives to facilitate for residential development to be more readily considered within this area, to ensure an adequate balance between tourist and non-tourist uses.

The 2018 LAP outlines that a general height of up to 4 storeys will be appropriate for sites within the Bray Seafront area. We contend that this guideline should be revised, with regard to national planning policy which has been published in the interim, particularly the *Urban Development and Building Height Guidelines for Planning Authorities* (2018) which specifically highlights that waterfront sites in towns and cities are suitable for heights in excess of 4 storeys.

We contend that Bray Seafront has potential to accommodate additional residential development, due to the location of a number of underutilised sites in this area, and proximity to the services and public transport available in the town centre.

We draw attention to Fontenoy Place, located at the former Bray Head Hotel, which was identified for new residential development as part of the 2018 LAP and has since delivered a high-quality new apartment scheme located along Bray Seafront. We also highlight that the former Dawson's Amusements site, although identified for new residential development within the 2018 LAP, has a recent permission for temporary amusement/carnival/event use, which indicates that the landowners do not have any intention to redevelop this site for residential use in the near future.

We therefore contend that it may be appropriate to examine the potential for additional sites within the seafront to be identified for new residential development.

2.0 SITE CONTEXT

2.1 Subject Site and Urban Context

The subject site comprises a single-storey commercial building and two-storey house. The subject site fronts onto Strand Road, providing clear views to the promenade and beach. The site is bound to the south-east by the Esplanade Hotel, which is a Protected Structure. The site is bound to the south-west by the railway line, and to the north-west by residential dwellings. There is a small portion of the subject site which fronts onto Convent Avenue to the north-west.

The subject site is located within Bray Town Centre, within the prominent seafront area within the south-east portion of the Town Centre.



Figure 2.1: Aerial view of the subject site (represented by indicative red-line boundary). (Source: Google Earth, as annotated by Tom Phillips + Associates, 2024.)



Figure 2.2: Location of the subject site (indicated by red star) in the context of the existing built-up area of Bray. (Source: Google Earth, as annotated by Tom Phillips + Associates, 2024.)

The area surrounding the subject site is characterised by a wide range of uses. The seafront includes a range of tourist, leisure, and commercial uses, alongside residential uses. This includes a number of hotels/BnBs, restaurants, and pubs. The Bray seafront park, promenade, and beach are important assets for leisure and amenity, not only for the Bray area but the surrounding areas also, with a range of festivals and events taking place at the seafront throughout the year. The area south and west of the subject site is primarily residential in nature. The subject site is located in close walking distance to the main retail and commercial areas within Bray, including Main Street, Quinsborough Road, and new 'Bray Central' development.

As the subject site is located within the established built-up town centre of Bray, there is a wide range of social infrastructure in-situ. Childcare facilities in the area include Cuala Montessori, Clare Elizabeth Creche, and Mother Goose Montessori. Primary Schools within close proximity to the site include Scoil Chualann, St. Andrew's National School, St. Cronan's Boy's National School, St. Patrick's Loreto Primary School, and Gaelscoil Uí Chéadaigh. Secondary School's within close proximity to the subject site includes Presentation College Bray and Loreto Bray. Newcourt School, which caters for people with additional educational requirements, is also located within close proximity to the subject site. Bray Institute of Further Education is located within Bray Town, providing a range of full-time, part-time, and evening courses. The subject site benefits from good public transport linkages, providing access to Third Level providers outside of Bray and Wicklow.

There is a large number of healthcare providers, including GPs and dentists, based within Bray Town Centre, including a new Primary Care Centre.

Bray Train Station is easily accessible from the subject site, located a 10-minute walk or 3-minute walk away. Bray Train Station is served by both the DART, Dublin-Dundalk Commuter, and Dublin Connolly-Rosslare services. The DART operates every 5-10 minutes during peak times and provides ease of access towards Dublin City Centre and beyond.

A large number of bus routes serve Bray Town Centre, including the following routes which stop at the train station: 45a, 45b, 84, 84A, 131, 143, 144, 155, 184, and 185. These routes provide access to education and employment hubs within Dublin, including Dublin City Centre, as well as residential areas within Dublin and Wicklow. A number of other bus routes serve other bus stops within the Bray Town Centre Area.

The subject site is also served by a good quality road network, with ease of access to the N11 and M11, which themselves connect into the M50, providing access to the wider motorway network.

2.2 Planning History

A Planning History search was conducted in respect of the subject site, utilising the Wicklow County Council Planning Application Map.

There have been 8 no. planning Applications lodged in respect of the subject site, one of which was withdrawn. There is one extant permission for the subject site, Application Reg. Ref. 20/1159. This Application was lodged on 17th November 2020 and sought the provision of a new 4 storey, 32-bedroom hotel, including 3 no. apartments, and café/restaurant.

This Application received a Final Grant of Permission on 23rd September 2021, subject to 17 No. Conditions. This permitted development has not yet begun constructed.

A breakdown of the 6 no. other Applications for the subject site are set out in Appendix A of this submission.

3.0 NATIONAL AND REGIONAL POLICY GUIDANCE

3.1 Project Ireland 2040: National Planning Framework

The *National Planning Framework* (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

Some of the key National Policy Objective's (NPO) included in the NPF in terms of the need for additional housing are as follows:

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 that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints."*

NPO 3c: *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints."*

We can see these national policies reflected in the overarching aims of the Pre-Draft Booklet for the forthcoming *Bray Municipal District Local Area Plan 2025*, which is outlined in further detail in Section 4.0 below.

3.2 Sustainable Residential Development and Compact Settlement Guidelines (2024)

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) were published in January 2024 and sets the national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Bray is considered a metropolitan key town, therefore, the following provisions apply:

Section 3.3.1

"The key priorities for city and metropolitan growth in order of priority are to:

- (a) **strengthen city, town and village centres,***
 - (b) **protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,***
 - (c) **realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development,***
 - (d) **deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,***
 - (e) **deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport, 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 city and suburbs area or a metropolitan town."***
- [Our Emphasis.]

Table 3.3

"Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods

The centre and urban neighbourhoods category includes:

- (i) the town centre and immediately surrounding neighbourhoods,*
- (ii) strategic and sustainable development locations, and*
- (iii) lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8). It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns."*

It is evident from the provisions above that the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) place a significant emphasis on Metropolitan Key Towns, such as Bray, and the role they play in the delivery of new housing. These Guidelines highlight the opportunity for delivery of new housing through infill development, particularly within the existing footprint of built-up areas.

3.3 Urban Development and Building Height Guidelines for Planning Authorities (2018)

The *Urban Development and Building Heights Guidelines for Planning Authorities* were published in December 2018, which primarily seeks to promote the provision of increased height at new developments, at appropriate locations.

We highlight the following Strategic Planning Policy Requirements (SPPRs), which relate to the provision of increased height:

Specific Planning Policy Requirement 1

*"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 shall explicitly identify, through their statutory plans, **areas where increased building height will be actively pursued for both redevelopment, regeneration 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."* [Our Emphasis.]

Specific Planning Policy Requirement 4

"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
- 2. a **greater mix of building heights** and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."* [Our Emphasis.]

We highlight Section 3.6, which specifically highlights sites located adjacent to parklands and the sea as being appropriate locations for increased height:

Section 3.6

*"Development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and **4 storeys or more** can be accommodated alongside existing larger buildings, trees and **parkland, river/sea frontage** or along wider streets."* [Our Emphasis.]

It is clear from the extracts above that increased height of buildings will be promoted at appropriate locations, specifically within the built-up footprint of towns and cities. Section 3.6 highlights that sites which front onto parkland and/or the sea may accommodate heights of 4 storeys or more.

3.4 Regional Spatial Economic Strategy: Eastern and Midlands Regional Assembly 2019-2031

The purpose of the *Regional Spatial Economic Strategy* (RSES) is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Regions.

The RSES describes Bray as forming part of the wider Dublin Metropolitan Area:

"The wider Dublin Metropolitan Area (DMA) metropolitan area, home to 1.4 million people in 2016, covers the continuous built up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, Bray and Greystones, which have strong connections with the city."

Bray is listed as a Metropolitan area Key Town within the settlement hierarchy. Key Towns are described as follows within the RSES:

“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.”

Metropolitan Key Towns are described as follows:

*“Metropolitan Key Towns are large economically active service towns located **within the Dublin Metropolitan Area**, with **high quality transport links and capacity for increased residential and employment densities** at strategic transport nodes.”* [Our Emphasis.]

The RSES highlights the importance of Bray as a Metropolitan Key Town:

*“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.”* [Our Emphasis.]

Regional Policy Objective 4.37 specifically relates to the continued development of Bray:

Regional Policy Objective 4.37

*“**Support the continued development of Bray** including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.”* [Our Emphasis.]

In accordance with National Planning Objective 68 (from the *National Planning Framework*), the Regional Assembly in July 2020 approved the ‘transfer’ of population growth of 13,000 from the city to the metropolitan area settlement of Bray, of which 9,500 would be to that part of Bray located in Co. Wicklow.

Further to the Sections above, the RSES further highlights the importance of Bray as a key location for the future delivery of housing, and this is cemented by the ‘transfer’ of additional housing targets to this settlement in 2020. The RSES highlights the existing social and transport infrastructure in-situ within Bray, which makes it a location capable of accommodating additional population growth.

3.5 Wicklow County Development Plan 2022-2028

The *Wicklow County Development Plan 2022-2028* (referred to as the Development Plan herein) was adopted on 12th September 2022. The Development Plan sets out the overall strategy for the proper planning and sustainable development of the County for the plan period and beyond.

The population targets for Wicklow County, as set out in the Development Plan, are underpinned by the *National Planning Framework* (and associated Roadmap), *Regional Spatial Economic Strategy*, and data from the Central Statistics Office.

These population targets include a total growth for the County between 2016 to 2031 of c. 27,575 – 31,075 persons (incl. MASP allocation). Of this, a minimum of c. 9,500 persons should be located in Bray.

	2016	2026	2031	Total growth 2016-2031
County Wicklow	142,425	155,000 - 157,500	160,500 – 164,000	18,075 – 21,575
plus 25% headroom (2026 only)		158,144 – 161,269		
plus MASP allocation (2031)			170,000 – 173,500	27,575 – 31,075
of which Bray (min)				9,500

Figure 3.1: Extract from Table 3.1: Population targets for Co. Wicklow 2026, 2031, as set out in the *Wicklow County Development Plan 2022-2028*.

The housing completions and targets for Wicklow County between 2017 to Q4 2031 are shown in Figure 3.2 below. These represent an anticipated total housing demand of 14,949 new homes to be built during this period.

County Wicklow	Units delivered 2017-2020	Estimated completions Q1 2021 - Q2 2022	Target Q3 2022 - Q2 2028	Target Q3 2028 – Q4 2031	Total
New housing demand	3,230	1,404	8,467	1,848	14,949

Figure 3.2: Extract from table 3.2: Housing completions and targets for Co. Wicklow 2020, 2022, 2028, 2031, as set out in the *Wicklow County Development Plan 2022-2028*.

The Development Plan includes a Settlement Hierarchy for Wicklow County, which lists Bray as the only Level 1 settlement. This Settlement Hierarchy is based upon the *Regional Spatial Economic Strategy for the Eastern and Midlands Region*.

The Development Plan notes the following with regard to the capacity of Level 1 settlements:

“Key Towns are identified for growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth.”

Figure 3.3 below, as extracted from the Development Plan, shows that 29,646 persons, c. 21% of the Wicklow County population lived within the settlement of Bray in 2016. There is a target population of 38,565 persons, c. 23% of the County population, for the Bray Settlement in Q2 2028. This shows a target to increase the percentage of the County population living within this settlement. The targets shown below also represent a targeted c. 30% population growth in Bray during this period, compared to a c. 19% total population growth for the County.

Level	Settlement	Population 2016	Population target Q2 2028
1	Bray	29,646	38,565
	Total	142,425	169,658

Figure 3.3: Extract from Table 3.4: Wicklow Settlement / Aggregate Settlement Population Targets 2016, Q2 2028, as set out in the Wicklow County Development Plan 2022-2028.

Table 3.5 in the Development Plan shows the targetted housing growth within the County to 2031. It shows an anticipated total housing growth of c. 14,949 no. new units within the County between 2016 – 2031, of which c. 5,062 no. units are targetted to be located within the settlement of Bray. This equates to c. 34% of the total targetted new units for the County during this period.

This targetted housing growth will result in a total housing stock in Bray of c. 16,294 no. units in 2031, which is a c. 45% increase compared to the 2016 housing stock. The total targetted housing stock in Bray in 2031 will represent c. 23% of the total housing stock in the County (c. 69,935 no. units). This is an increase on the c. 20% of housing stock in the County which was located in Bray in 2016.

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
1	Bray	11,232	165	100	4,026	771	5,062
	Total	54,986	3,230	1,404	8,467	1,848	14,949

Figure 3.4: Extract from Table 3.5: Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031, as set out in the Wicklow County Development Plan 2022-2028.

Section 4.2 of the Development Plan highlights the geographical constraints to the future development of Bray. It highlights that to meet their housing targets, a new development centre has been planned at Fassaroe, located west of the M11/N11, however, new and upgraded infrastructure is required to unlock the development potential of these lands:

Section 4.2:

“Further expansion of the settlement is severely constrained on all sides by the administrative boundary of Dun Laoghaire-Rathdown and the coast to the north and east, Bray Head / Sugarloaf Mountains to the south and the N/M11 to the west. In order for Bray to fulfil its growth potential, lands at Fassaroe to the west of the N/M11 are targeted for new housing and other facilities. The development of a new centre at Fassaroe is largely dependent on the delivery of infrastructure including upgrades to the N/M11 and the delivery of high quality public transport connections to Bray Town Centre and to Dublin City Centre.”

The Development Plan outlines a range of Policies and Objectives which support compact growth and the provision of infill development within the built-up areas of the County.

County Policy Objective 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."* [Our Emphasis.]

County Policy Objective 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."* [Our Emphasis.]

County Policy Objective 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."* [Our Emphasis.]

Section 5.4.1

*"Investment in regeneration, renewal, public realm improvements, amenity projects and placemaking actions is essential to transform the capacity and harness the potential of our towns and villages. There are many **sites and buildings** throughout the County that are **underutilised**. The **potential of these assets needs to be harnessed**."* [Our Emphasis.]

Section 5.6: Town and Village Regeneration and Rejuvenation Priorities - Bray

*"There will be a **strong focus on** addressing dereliction and **underutilised sites** and delivering placemaking that will strengthen the town's image and sense of place."* [Our Emphasis.]

It is evident from the extracts above that the Development Plan acknowledges the need for additional housing within the County, of which, an increased percentage should be located in Bray, the only Level 1 Settlement in the County. The Development Plan highlights that this future additional housing provision should be focused on the existing built-up areas, through compact growth. Due in part to the geographical barriers to development at this location, the Development Plan further highlights that infill development, brownfield development, and the regeneration of underutilised sites, will be encouraged to meet the housing needs within existing built up areas.

Whilst a large quantum of land has been zoned for residential development in Fassaroe, we highlight that this area is distinct from the existing built-up area of Bray, which are split by the M11/N11, which has limited vehicular and pedestrian crossings. The Development Plan outlines a number of new and upgraded infrastructure, particularly relating to traffic and transport.

The subject site presents an opportunity for compact growth at an underutilised site within the existing built-up area of Bray.

4.0 BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2025 PRE-DRAFT CONSULTATION

The Pre-Draft Public Consultation period for the *Bray Municipal District Local Area Plan 2025* (referred to as the 2025 LAP herein) commenced on 20th November 2024.

The 'Pre-Draft Consultation Booklet' for the 2025 LAP set out 5 no. key topics for the preparation of the forthcoming Local Area Plan. There include 'Housing – Population – Compact Growth' and 'Regeneration of Communities and Places – Healthy Placemaking – Urban Design – Opportunity Sites'.

Housing – Population – Compact Growth

*"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. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment."* [Our Emphasis.]

Regeneration of Communities and Places – Healthy Placemaking – Urban Design – Opportunity Sites

*"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 overdevelopment, decline, etc. The local area plan will promote healthy place-making through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow."* [Our Emphasis.]

It is evident from this 'Pre-Draft Consultation Booklet' that in line with the national and regional Policies and Objectives outlines above, additional housing will be required in the Bray region over the course of the new LAP period, of which, there is an emphasis placed on the provision of infill development and compact growth within the built-up footprint of the town.

5.0 BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018-2024

The *Bray Municipal District Local Area Plan 2018-2024* (referred to as the 2018 LAP herein) was adopted on 14th May 2018 and is the requisite plan for the area until the forthcoming *Bray Municipal District Local Area Plan 2025* is adopted.

5.1 Land Use Zoning

The subject site is currently zoned 'SF – Bray Seafront' within the 2018 LAP, which has the following objective:

“To provide for the development and improvement of appropriate seafront uses.”

This Land Use Zoning Objective is further described as follows:

“To protect and enhance the character of the seafront area and to provide for mixed-use development including appropriate tourism, retail, leisure, civic and residential uses. The Seafront area shall be promoted as the primary tourist, recreational and leisure centre of Bray.”

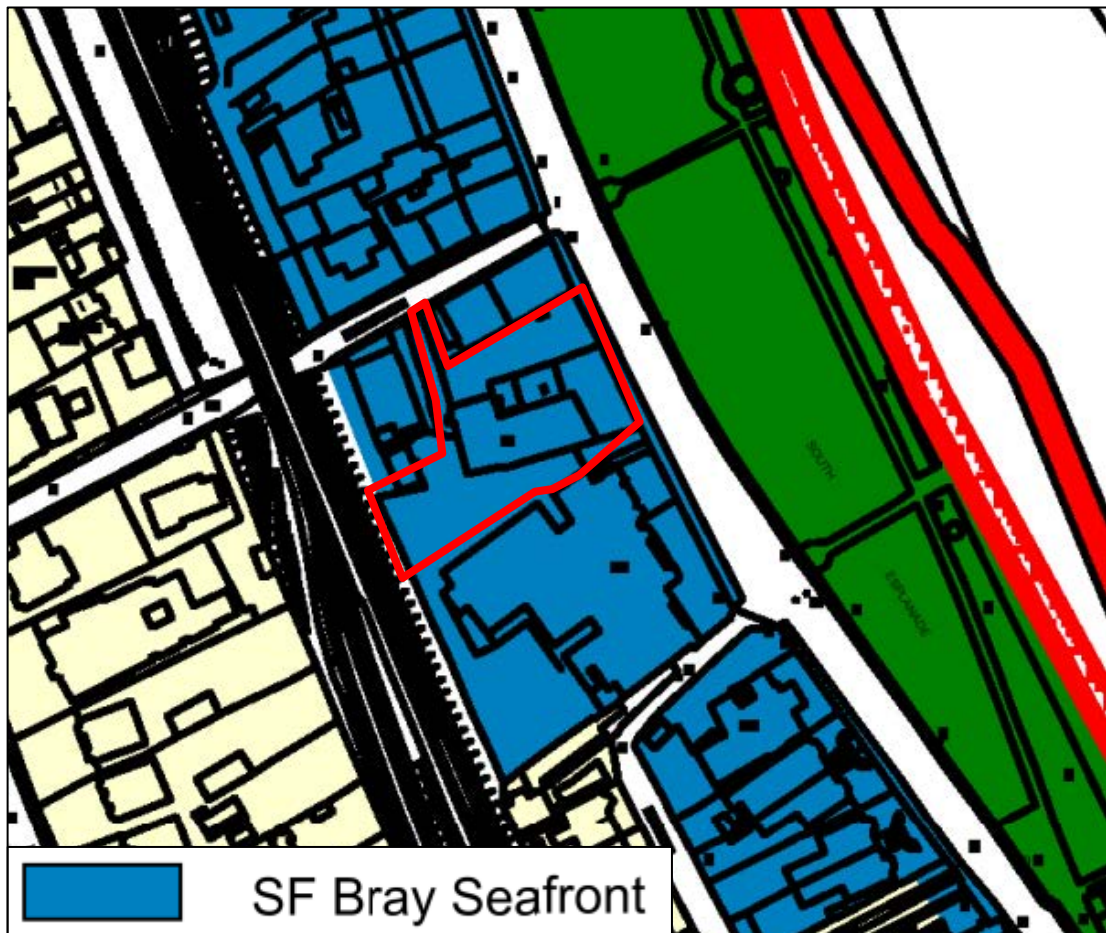


Figure 5.1: Extract from the 'Bray Municipal District Local Area Plan 2018 - Land Use Zoning Map' showing the subject site (represented by indicative red-line boundary) zoned 'E1 – Employment'.

The 2018 LAP does not list any land uses which would be generally appropriate for lands zoned 'SF - Bray Seafront', which is considered a 'Mixed-Use' area. .

5.2 Bray Seafront

The 2018 LAP provides the following description of Bray Seafront and guidelines for the future development of this area:

Section 2.2.1

“Bray Seafront and Bray Head draw a significant number of day trippers to the town. Protecting the heritage and amenities of the town is particularly important if it is to continue attracting visitors into the future. There is scope to improve the overall visitor experience through measures such as improving the quality of tourist services and facilities and through measures that could improve the quality of the overall appearance of the town and seafront area, including for example shopfront improvements.”

Section 2.2.5

“Bray seafront area shall be a vibrant and attractive seafront area, which functions as the primary tourist, recreational and leisure centre of the town. It is a priority to rejuvenate the seafront area through the expansion of retail and nonretail services, particularly targeted at the visitor market and tourism products. The town centre is located some distance from the seafront area and does not benefit from spin-off associated with the uptake of leisure activities on the seafront. Taking account of this, it is of major importance that the centre carves out a significant role for itself in the provision of quality shopping facilities which act as a draw for people into the centre.”

Section 7.1

“The ‘Seafront Area’ is defined as the area included in the ‘SF’ and OS1 zones, which run parallel to Bray Beach. Bray Seafront is a locally distinctive and significant area in the town. It is rich in architectural and natural heritage, comprising the beach, the Esplanade and many fine architectural structures dating to Victorian times, many of which are listed in the Record of Protected Structures. The area has huge symbolic, cultural, social and economic importance and as such, its character must be preserved to ensure that its amenity and economic value is safeguarded for existing and future generations.

The vision for this area is for it 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.

In order to respond to the changing nature of modern tourism and maintain and improve the vibrancy and economic vitality of the seafront, the area shall be developed to incorporate a mix of uses that provide year-round attractiveness to both locals and tourists. Residential development shall play a role in the supervision of the area; associated increased footfall will further bolster economic activity and contribute towards the long-term prosperity of the area.

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.

In the SF zoned ‘Seafront’ area, 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.

While having regard to the above, the Council will consider permitting developments comprising modern, innovative designs, where the character and setting of historically important buildings is not compromised.”

The 2018 LAP provides the following Objectives for lands zoned ‘SF – Bray Seafront’:

“In the SF zone, the following objectives shall 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.” [Our Emphasis.]*

Despite the 'Seafront' area being considered a mixed-use area, the Policies and Objectives above do not provide any mention of new residential development being promoted in this area, with the emphasis being placed on tourism and commercial uses. Whilst it is important to preserve the status of the Bray Seafront as a tourist destination, we contend that regard should also be given to the role this area can play in delivering much needed housing, particularly in areas of the town located close to the centre and main transport links. There are a number of large sites on the seafront which have large development potential, which is currently restricted by the tight Policies and Objectives set out for this Land Use Zoning.

We highlight that the 2018 LAP was published in advance of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) being published. Therefore, we contend that the Objective that "generally new buildings shall not exceed the 4 storeys height" is restrictive in the context of the SPPRs contained within the Guidelines, which seeks increased building heights within appropriate built-up areas. As outlined in Section 3.3 above, the Guidelines specifically highlight sites which front onto parkland and/or the sea may be appropriate locations for heights of 4 storeys or more.

We highlight that the lands zoned 'SF – Bray Seafront' within this LAP have the potential for increased height, not only with regard to the national policy, as outlined above, but also because of the unique geographical context of this area. The sites located within this zoning are bound to the north-east by the seafront park and beach, and to the south-west by the wide railway line. Therefore, sites such as the subject site would be capable of providing new developments with height in excess of 4 storeys, which are unlikely to result in any material impact on neighbouring properties, via overlooking or overshadowing.

5.3 Settlement Capacity and Residential Development

The 2018 LAP provides the following targets for housing stock delivery between 2016 and 2025:

	Bray	Enniskerry	Kilmacanogue	Rural Area
2016 Population	29,624	1,889	934	3,230
2016 Housing Stock	11,225	640	374	1,051
2025 Housing target	17,651	1,112	481	-
Growth	6,426	472	107	-

Figure 5.2: Extract from Table 2.7 of the 2018, which provides the Housing Stock growth target up to 2025 in Bray MD area, by settlement.

This table shows a targeted 57% growth in housing stock in both Bray itself and the Bray Municipal District between 2016 and 2025. Within the Municipal District, 92% of new housing stock is targeted to be located within the settlement of Bray.

The Residential Development Strategy for the Bray Municipal District is provided below, as set out in the 2018 LAP:

Residential Development Strategy for Bray Municipal District

- *“To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Bray MD;*
- *To ensure sufficient zoned land is available at appropriate locations capable of meeting the housing needs of the targeted population of the settlements in the MD over the plan period in a sustainable manner. Notwithstanding the zoning of land for residential purposes, the Planning Authority shall monitor and implement the population targets as set out in the County Development Plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded;*
- *To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish;*
- *To promote and facilitate the redevelopment of sites in town centres, including identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre;*
- *To promote and facilitate the rapid delivery of the maximum number of housing units in the key development areas of Fassaroe and the former Bray golf club.”*
[Our Emphasis.]

Further to the Residential Development Strategy outlined above, Residential Development Objective 4 also promotes the provision of infill development and the regeneration of underutilised sites:

Residential Development Objective 4

“To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.”

The 2018 LAP shows a targeted c. 57% increase in housing stock in the Bray Municipal District between 2016 and 2031, of which c. 92% should be located in Bray. The Settlement Strategy for the 2018 LAP places an emphasis on the provision of new housing through compact growth, particularly through infill development and the regeneration of underutilised sites within the existing built-up area.

5.4 Assessment of Existing Residentially Zoned Land

An assessment has been conducted of the interactive Current Land Use Zoning Map for the Bray Municipal District (available on the Draft LAP Consultation Portal and on ArcGIS).

The 2018 LAP splits the Bray Municipal District into three distinct settlements: Bray, Enniskerry, and Kilmaconoge. The Bray settlement is formed of two distinct geographical areas: the exiting built-up area of Bray, located east of the M11/N11, and Fassaroe, located west of the M11/N11. The location of these settlements and of the lands zoned for new residential development³ within the 2018 LAP are shown in Figure 5.3 below. We highlight that no land is zoned specifically for new residential development in Kilmaconoge, and a relatively small area is zoned in Enniskerry. The majority of lands zoned for new residential development in the 2018 LAP were within the Bray settlement.

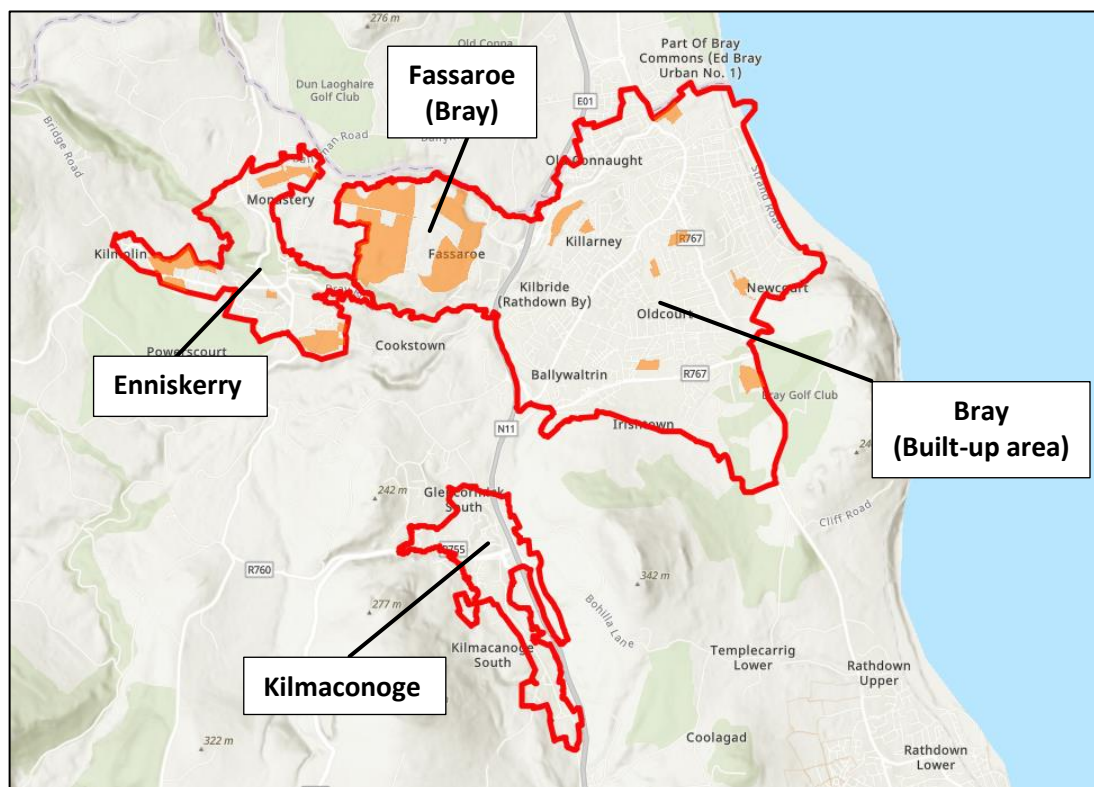


Figure 5.3: Lands zoned for new residential development within the *Bray Municipal District Local Area Plan 2018*. (Source: Wicklow County Council, as mapped and annotated by Tom Phillips + Associates.)

The geographical divide between the built-up area of Bray and Fassaroe is shown in Figure 5.4, which also denotes the physical boundary between them, the M11/N11.

³ Comprising land zoned 'R-HD – New Residential', 'R20 – New Residential', 'R15 – New Residential', 'R10 – New Residential', and 'R – Special New Residential'.



Bray Municipal District Local Area Plan 2025: Pre-Draft Consultation
Submission in respect of lands at the Esplanade Hotel, Strand Road, Co. Wicklow

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
Presentation College	2.2	R-HD	75
Ravenswell	2.97	R-HD	150
FCA	2.03	R-HD	100
Infill on other TC / RE lands			200
TOTAL			6,453

Figure 5.5: Extract from Table 3.1 of the 2018 LAP, showing the sites zoned for new residential development within the 'Bray and Environs' settlement.

Of the 132.1Ha zoned for new residential development in the Bray Settlement, c. 71% (93.67Ha) is located within Fassaroe. These lands have a listed potential for c. 4,040 units.

Fassaroe is currently an agricultural area, which features a large quarry and linear pattern of residential development. This area is identified in the LAP for large scale new residential development, however it is outlined that development in this area is dependent on large scale infrastructure upgrades in the area, such as road upgrades and the provision of public transport linkages. By way of example, Berryfield Lane, the single thoroughfare for this area, is a country lane, which is only wide enough for one car at a time and does not feature footpaths. In its current form, large scale residential development would not be appropriate.

Within the course of the 2018 LAP period, only one planning application was lodged in respect of the large area zoned for residential development in Fassaroe, ABP Reg. Ref. 313314, which is yet to be determined by An Bord Pleanála. A new park and ride facility within Fassaroe has been permitted, however, there are no signs as of yet of constructed having commenced.

Whilst Fassaroe is an important area for new residential development in Bray, we highlight that no new residential development was realised in this area during the lifetime of the 2018 LAP, potentially due to the lack of existing infrastructure in the area. Therefore, we contend that the development of Fassaroe is likely a longer term goal, compared to other sites within the existing footprint of Bray, which has the necessary services and infrastructure in-situ.

We have provided below a breakdown of the remaining c. 38.43 of land identified for new residential development in the Bray settlement, as set out in the 2018 LAP.

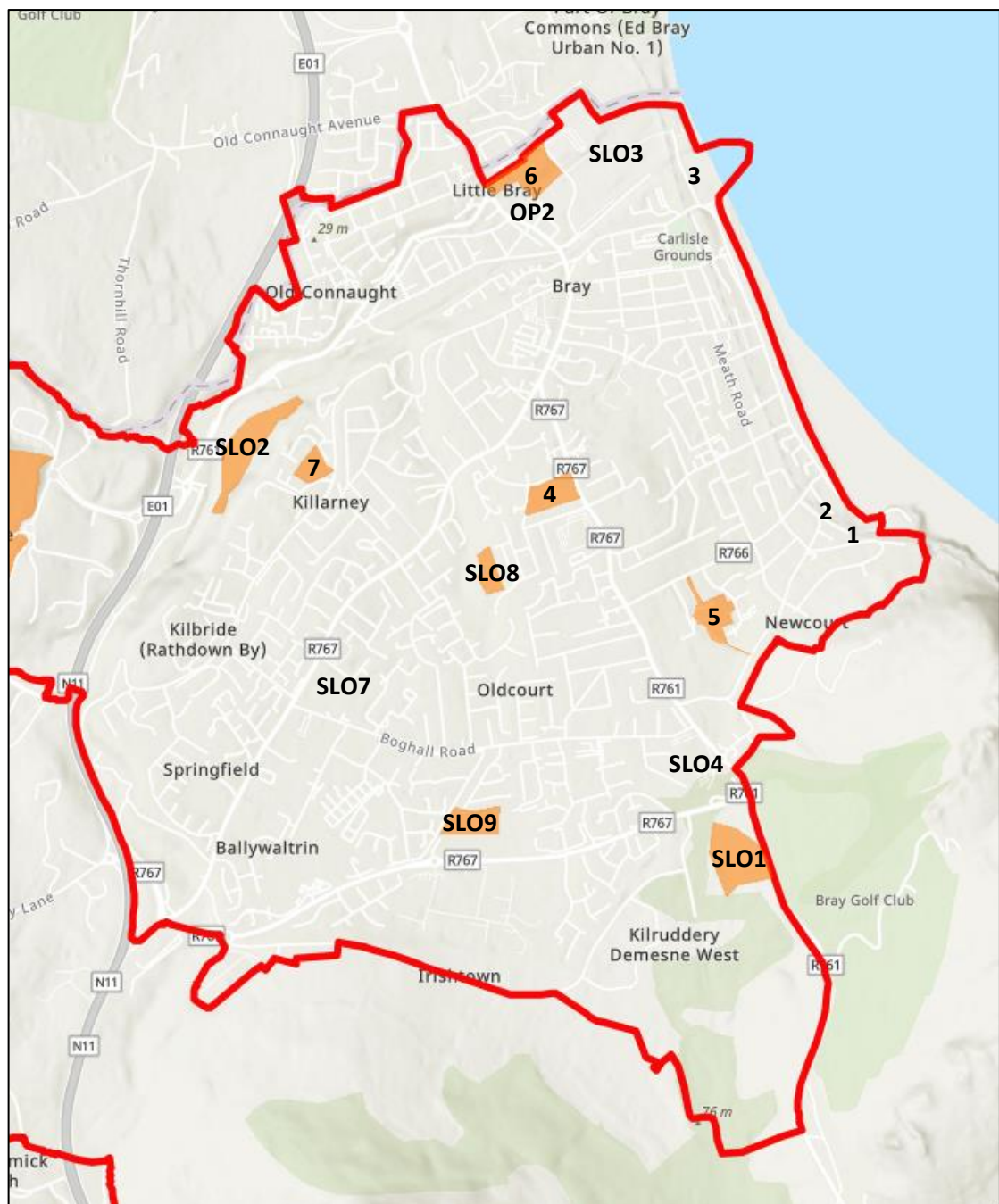


Figure 5.6: Location of sites identified for new residential development within the built-up area of the Bray settlement, as set out in the *Bray Municipal District Local Area Plan 2018-2024* (as mapped by Tom Phillips + Associates, 2024).

Site No.	Status
SLO1	Kilruddery Two-phase residential development (permitted under Reg. Refs. 21/1453 and 21/1501) comprising a total of 130 no. units, which is nearing completion.
SLO2	Rehills – The Slang No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
SLO3	Former Bray Golf Club A total of c. 550 no. units permitted under ABP Reg. Refs. 31181-21, as part of Phase 1 of a two Phase development. Currently under construction.
SLO4	Dell LRD comprising 178 no. units granted Permission in March 2024 (Reg. Ref. 24/46).
SLO7	AO Smith Permission Granted in January 2024 (Reg. Ref. 23/60133) for 12 no. residential units above existing supermarket within existing developed portion of site. No Planning Applications lodged in respect of the remainder of the site during the previous LAP period. There are no historic Planning Applications visible for the development of the remainder of this site.
SLO8	Oldcourt House No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
SLO9	Bray Southern Cross Residential development comprising 208 no. units constructed and currently occupied.
OP2	Former Buckley Heitons, Dublin Road SHD Application for 139 no. units lodged in August 2022, awaiting a decision from An Bord Pleanála.
1	Bray Head Hotel, Bray Seafront Residential development comprising 49 no. units permitted under Reg. Ref. 18/938 (as amended) granted in June 2019.
2	Former Dawson's, Bray Seafront Existing operational car park. Application Granted in February 2024 (Reg. Ref. 23786) for retention for 5 years of occasional amusement, carnival, and festival use.
3	Bray Harbour No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
4	Brook House No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
5	Presentation College SHD granted Permission in March 2022 (ABP Ref. 312020-21) for 179 no. residential units. Construction appears to have begun.

6	Ravenswell Site comprises St. John of God campus, which is operational. No “vacant” land onsite. No Planning Applications for redevelopment. No specific Objectives in LAP to redevelop these lands.
7	FCA No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.

Through an analysis of the sites zoned for new residential development within the Bray settlement, as set out in the 2018 LAP, only a small number of the sites have been brought forward for development over the lifetime of the plan. We contend that only four of these sites have been constructed or are under construction, two have live permissions but it is unclear if these have yet begun construction, and two are awaiting planning permission. Nine sites have not had any planning applications lodged in the life of the 2018 LAP for new residential development, and a number of these sites have had planning applications for other forms of development during this same period, reflecting that there may not be any intention to redevelop these lands.

We contend that based on the analysis above, it is unlikely that the targets for new housing, as set out in the 2018 LAP, were met. Therefore, the new Draft LAP must account for the shortfall carried over from this previous development plan period. These sites may have future development potential and therefore should remain zoned as such. We contend, however, that additional land must be zoned for new residential development, to ensure that the current shortfall of housing can be met, whilst also ensuring that a sufficient quantum of land is available to meet the future housing needs over the lifetime of the new LAP.

To align with national, regional, and local planning policy, we would encourage that additional land be zoned for new residential development within the existing footprint of Bray, allowing for compact growth by facilitating increased infill development and regeneration of underutilised sites. This will alleviate the dependency on the delivery of housing in Fassaroe, which does not currently have the necessary infrastructure to facilitate development at the scale outlined in the 2018 LAP.


6.0 CONCLUSION

As identified in the Issues Papers for the forthcoming *Bray Municipal District Local Area Plan 2025*, the Bray Municipal District will require the provision of new housing, of which 30% is to be provided within the existing built-up area. It is evident from the analysis provided above that the current quantum of zoned residential land available is unlikely to be capable of meeting these requirements.

It is, therefore, evident that additional land is required to be zoned for new residential use, particularly within the built-up area of Bray.

We would encourage the Local Authority to consider the potential for regeneration of underdeveloped sites within the seafront area for potential future residential development. We would also encourage that the guidelines for height within this area be re-examined with regard to the relevant national guidelines.

We look forward to written acknowledgement of receipt of this submission in due course.

A handwritten signature in blue ink, appearing to read 'John Gannon'.

John Gannon
Director
Tom Phillips + Associates

APPENDIX A

Full Planning History for the Subject Site

Reg. Ref.	03/630014
Applicant	Mr J McGettigan
Lodgement Date	10/02/2003
Decision	Refuse Permission
Decision Date	02/04/2003
Proposed Development	<i>"Erection of an apartment scheme of 21 no. 2 bed units comprising three storeys plus penthouse, an underground car park including provision for 18 no. car parking spaces required by Planning Ref 137/99 and to demolish three habitable houses and replacement of fitness centre adjacent to Lacy's Hotel."</i>

Reg. Ref.	08/630111
Applicant	Terino Developments Ltd.
Lodgement Date	05/06/2008
Decision	Refuse Permission
Decision Date	25/07/2008
Proposed Development	<i>"1. Demolition of existing one storey commercial building and two storey residential building on the site. 2. Construction of 19 space car park, with access off Strand Road and 3 No. leisure/retail units (total area = 358.7 m2) at ground floor level. 3. Provision of 19 residential units arranged in 2 blocks over first floor podium with total of 3/4 floors units comprising 5x1 bed, 11x2 bed, 2x3 bed and 1x4 bed apartments. Each unit is provided with a terrace or balcony private open space. 4. Provision of landscaping, ESB sub-station. All associated site services including connection to mains, drains and water supply. The total development gross floor area is 3026m2."</i>

Reg. Ref.	09/630123
Applicant	Terino Development Ltd.
Lodgement Date	07/10/2009
Decision	Refuse Permission
Decision Date	30/11/2009
Proposed Development	<i>"Development consisting of: 1. Demolition of existing one storey commercial building and the two storey residential building at the rear of the site. 2. Construction of 2 no. leisure/retail units (total area=187m2) at ground floor level, 23 space car park, with access of Strand Road and 3. Provision of 20 residential units arranged in 2 blocks over first floor podium with total of ¾ floors units comprising 4x1 bed, 14x2 bed and 2x3 bed. Each unit is provided with a terrace or balcony private open space. 4. Provision of landscaping, ESB sub-station. All associated site services including connection to mains, drains and water supply. The total development gross floor area is 3320m2."</i>

Reg. Ref.	10/630076
Applicant	Terino Developments Ltd.
Lodgement Date	21/07/2010
Decision	Refuse Permission
Decision Date	14/09/2010
Proposed Development	<i>"Development consisting of: 1. Demolition of existing one storey commercial building at the front of the site and at the rear of the site and demolition of two storey residential building. 2. Provision of 20 residential units arranged in two blocks with a total 3 floors on the front block and 3 floors over first floor podium at the rear comprising 1x1bed units, 19 x 2 bed units. The ground floor units are provided with their own street level private open space, the first and second floor units are provided with a terrace or balcony private open space. 3. Provision of landscaping, ESB substation, all associated site services including connection to mains, drains and water supply. The total development gross floor area is 2633m2."</i>

Reg. Ref.	11/630032 (ABP Ref. 239631-11)
Applicant	Jarlath Sweeney
Lodgement Date	12/04/2011
WCC Decision	Grant Permission (Subject to 21 No. Conditions)
WCC Decision Date	05/09/2011
ABP Decision	Refuse Permission
ABP Decision Date	03/07/2012
Proposed Development	<i>"Demolition of existing one storey commercial building at the front of site and at the rear of the site demolition of two storey residential building and planning permission for 8 no. Georgian town houses and 3 no. apartments at Shoreline, Strand Road, Bray, adjacent to the Esplanade Hotel, with provision for ESB substation, underground car parking, bicycle parking, waste and recycling shed, all associated site works and connection to existing water and sewage and drains installations."</i>

Reg. Ref.	13/630005 (ABP Ref. 242610-13)
Applicant	Jarlath Sweeney
Lodgement Date	21/01/2013
WCC Decision	Grant Permission (Subject to 19 No. Conditions)
WCC Decision Date	25/09/2013
ABP Decision	Refuse Permission
ABP Decision Date	21/02/2014
Proposed Development	<i>"Demolition of single storey commercial building at front of site and two storey residential building at rear of site, and subsequent construction of three storey terrace comprising of 2 no. three storey houses and 3 no. duplex (i.e. 3 no. two storey houses over 3 no. single storey apartments), thereby creating a total of 8 no. dwelling units with all associated site works including partial altering of ground levels, construction of retaining walls and provision of car parking at front."</i>



Reg. Ref.	20/1159
Applicant	J & L Sweeney & F O'Grady
Lodgement Date	17/11/2020
Decision	Grant Permission (Subject to 17 No. Conditions)
Decision Date	23/09/2021
Proposed Development	<i>"New 4 storey, 32 bedroom hotel, including three number apartments at third floor level, restaurant/café at ground floor level, semi-basement parking for 8 number vehicles and associated siteworks, together with permission for demolition of single storey commercial building to the front of the site and two storey residential building at the rear of site (Esplanade Hotel - Protected Structure)."</i>