



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Mary Doyle
Reference:	BRAYLAP-163217
Submission Made	December 18, 2024 4:46 PM

Map



Site Description:

File

Patchwork - Submission for Pre-Draft Bray Local Area Plan 2025.pdf, 0.56MB

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

18th December 2024

Re: Bray Municipal Local Area Plan 2025 Pre-Draft Submission

Dear Sir/Madam,

On behalf of our client, Mary Doyle, we wish to make this submission for the Pre-Draft of the Bray Municipal Local Area Plan 2025.

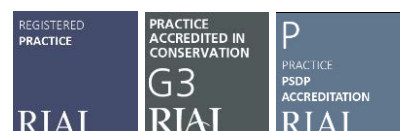
The purpose of this submission is to request that the zoning for their privately owned land be changed from a split zoning of RE-Existing Residential and OS1-Open Space, to RE-Existing Residential only. A portion of the site is also zoned as part of a Green Corridor, we wish to request that this zoning is removed.

Background:

Our client is the resident & owner of [REDACTED] Killarney Road, Bray. She has lived in this house for [REDACTED]. Patchwork is on the Killarney Road and is located between Beechurst and Glenlucan. The garden is approx. ¼ of an acre and the Swan River forms the south-westerly boundary.

In the Bray Municipal Local Area Plan 2018 – 2024, this site has a split zoning, with a portion of the land zoned RE–Existing Residential and a portion of the land zoned OS1-Open Space (see page over). A portion of the garden is also zoned as part of a Green Corridor.

Our client never examined the Local Area Plan when it was being developed in 2018, and on review wonders if the split-zoning and green corridor zoning might have been done in error. Having read



through the objectives and definitions set out in the 2018 - 2024 LAP, along with reading the Chief Executive's Report, and looking at neighbouring sites in the area with similar conditions, we believe the zoning to be incorrect, and wish to request that it is updated to Residential only in the new 2025 Bray Municipal Local Area Plan.

Zoning on Current Bray Municipal Local Area Plan 2018 - 2024:



Land owned by our client outlined in red, as taken from Map No. 2 'Land Use Zoning Map' from the Bray Municipal District Local Area Plan 2018-2024.

The site outlined in red above is the land owned by our client. As noted, it is partially zoned RE-Existing Residential and partially zoned OS1-Open Space.

As per the Bray Municipal Local Area Plan 2018 – 2024, OS1–Open Space zoning is defined as;

'OS1: To protect and enhance existing and provide for recreational open space - to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public'.

The land outlined above is a privately owned garden, and is enclosed by a boundary on 3 sides of the site and the Swan River on the fourth. It is not an existing recreational open space, and is not accessible to the public. Therefore, re-zoning the land to residential would seem like a more appropriate zoning, and would not be reducing any opportunities for use by the wider public.



It should also be noted that in the 2nd Chief Executive's Report on the 2018-2024 LAP, it is recommended that land which is privately owned should be omitted from 'Open Space' zoning.

Opinion of Chief Executive

This proposed alteration, to omit lands which are not publically owned or not open to the public from the 'open space and parks' code on the GI Map, was recommended by the Chief Executive in his previous report and is still recommended.

Excerpt from '2nd Chiefs Executive's Report – Draft Bray Municipal District Local Area Plan 2018', pg.84 – Proposed Material Alteration No.29.

As our client's land is privately owned, we reason that no part of the site should be zoned OS1, and request the entire site be re-zoned as RE-Existing Residential in line with the recommendation of the Chief Executive.

Green Corridors/Green Infrastructure:

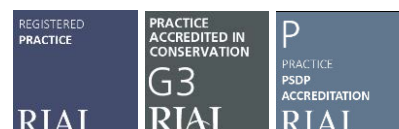
We note that part of the land owned by our clients is part of a Green Corridor on the Bray Municipal Local Area Plan, see below.



Land owned by our clients on existing Green Corridor outlined in red.

The Bray Municipal Local Area Plan outlines 5 key objectives for Green Infrastructure (GI1 – GI5). Having examined these objectives in reference to [REDACTED] we believe that they do not apply to this site, and question if it may have been zoned as a green corridor in error.

GI2 & GI5 both focus on the connectivity of green spaces/recreational areas linked by a connected green corridor. The land owned by our client is contained by well-established boundaries on all sides, and is inaccessible to the public. As such it is not suitable to be used as part of a recreational route of linked spaces. There has been discussion of a greenway along the Swan River, with a connected pedestrian route along the green corridor. We note that the land on the opposite side of the river bank (at the entrance to Glenlucan Estate) is dedicated open space (and is currently zoned as a Green Corridor) and is publicly accessible land. It seems more appropriate that this space is used to form a green corridor and connect green spaces as outlined in GI2 & GI5.



GI4 focuses on the need to promote the preservation of trees and woodlands. Map No17.05B from the Wicklow County Development Plan 2022 – 2028, shows no trees or woodland areas with preservation orders on the lands owned by our client, and so this objective does not apply to this site.

GI2 notes the importance of maintaining a buffer zone along the riverbed to maintain vegetation strips, floodplains, and wetlands. It should be noted that our client's land is significantly elevated above the river and as such does not form part of a wetland, nor is it liable to flooding. It also strikes us looking at the Land Use Zoning Map, and the Green Infrastructure Map from the 2018-2024 LAP, that many properties/sites along the Swan River, which have similar conditions to [REDACTED] are all zoned as exclusively RE- Existing Residential and not zoned as part of the green corridor. This is in line with the Chief Executive's recommendation that private property should be zoned as residential only, and we question if our client's property may have been overlooked when it was included as part of a green corridor.



Land/Properties with similar site conditions outlined in red on the Land Use Zoning Map (Left) and Green Infrastructure Map (Right). Patchwork outlined in blue.



Maps on the previous page show No.30 – 32 Glencourt, No.35A - 41 Glenlucan, and Herbert Place, all of which share a similar condition bordering the Swan River as our client's site. Each of these sites are privately owned and are zoned entirely as RE-Existing Residential. None are zoned as part of a Green Corridor. We believe that our client's land being of a similar condition should be zoned the same way.

Conclusion:

Having examined the objectives outlined in the current Bray Municipal Local Area Plan, in conjunction with reading the Chief Executives Report, and looking at similar sites in the area, we believe that our client's land at [REDACTED] Killarney Rd, Bray, has been incorrectly zoned on both the Land Use Zoning Map, and the Green Infrastructure Map. Our client's land does not fit the criteria outlined for OS1, and as per the Chief Executive's recommendation, all private land should be zoned as residential. The site is inaccessible to the public and as such is not suitable for many of the Green Infrastructure objectives, nor does it have any wetlands, floodplains or protected woodlands for which these objectives would apply. Removing the zoning of 'Green Corridor' will not have an adverse effect on the connectivity of the green spaces/corridor given the open space on the opposite side of the river, and would be in line with the zoning of privately owned sites with similar conditions in the area.

With the above being noted, we request that our client's land be re-zoned entirely as RE-Existing Residential, and have its zoning as a Green Corridor removed.

I would be very grateful for a written acknowledgement of this submission.

Should you have any further queries, please do not hesitate to contact me.

Yours faithfully,



Colm Doyle MRIAI
DMVF Architects

