



Pre Draft Bray LAP Submission - Report

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BRAY MD LOCAL AREA PLAN 2025

PRE-DRAFT SUBMISSION ON SIGNIFICANT PLANNING TOPICS



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1 INTRODUCTION

This submission is prepared by RPS planning consultants, AtkinsRealis Consulting Engineers and MCORM Architects on behalf of Borg Developments which is a key landowner of residential zoned land at Fassaroe, Bray within the Bray Municipal District Local Area Plan (Bray MD LAP) boundary. The extent of land in the ownership of Borg Developments is identified on **Figure 1-1**.

Borg Developments welcomes the commencement of the preparation of the Bray MD LAP 2025 by Wicklow County Council (WCC) and looks forward to the timely progression to the next stage of the plan making process with the publication of a draft LAP.

The Consultation Portal created by WCC identifies 6 key topics the LAP will address and invites responses to a number of questions posed under each topic. In advance of WCC preparing the draft LAP, we set out a number of comments relating to development within Fassaroe, which addressed primarily in the context of the 'Housing - Population – Compact Growth' topic identified on the Consultation Portal. The comments are made to support a clear and concise LAP which will facilitate a logical and planned approach to phased development at Fassaroe.

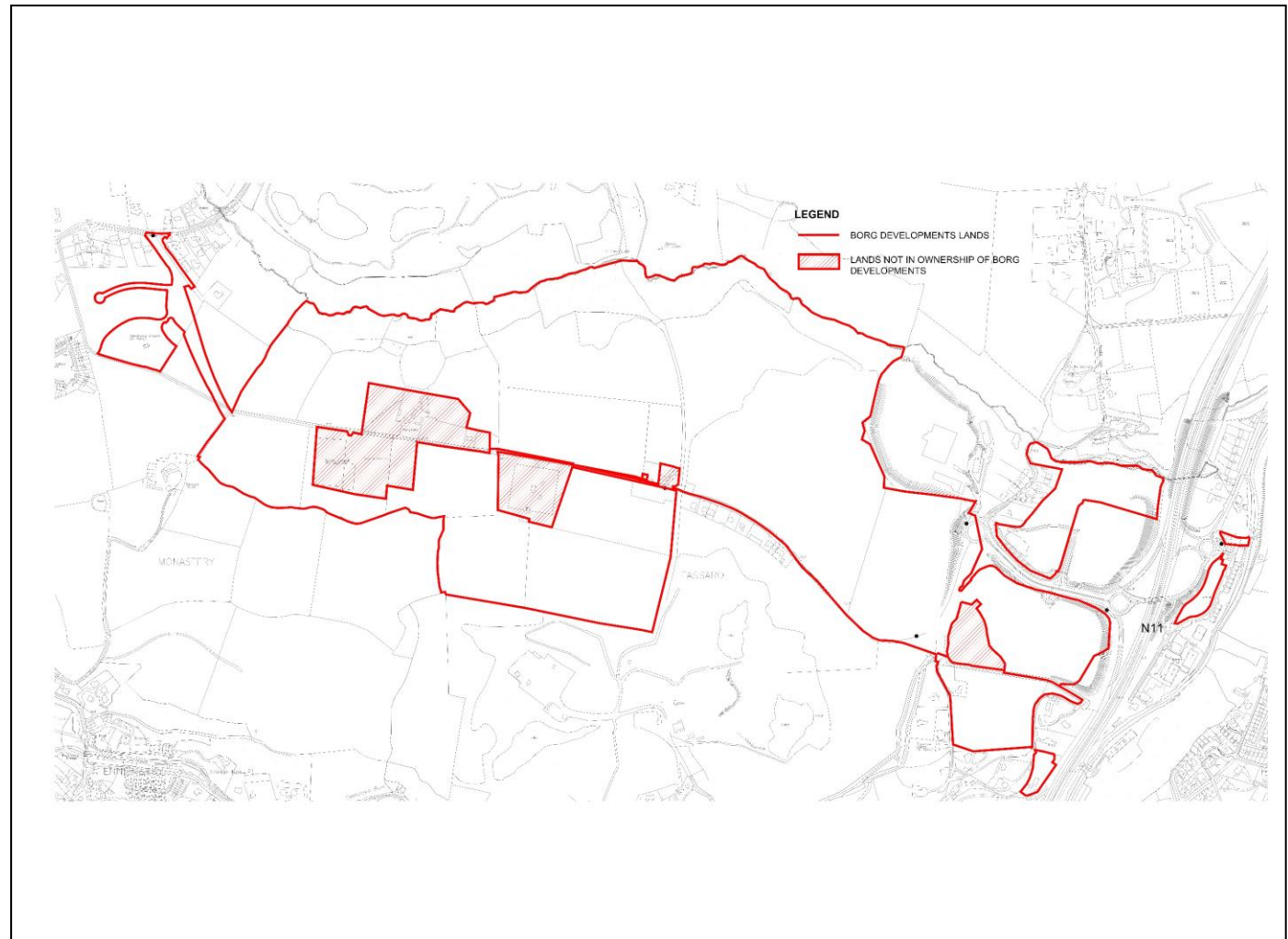


Figure 1-1: Extent of Borg Development Owned Lands at Fassaroe, Bray, Co. Wicklow

2 HOUSING – POPULATION – COMPACT GROWTH

2.1 General Content and Questions Posed on Consultation Portal

The Consultation Portal notes that the focus of growth for the Bray Municipal District will be Bray with additional growth in Enniskerry and modest growth in Kilmacanogue. It notes that to facilitate compact growth 30% of new homes need to be built in the existing built up area and town / villages centres.

The Portal advises that WCC is 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 Wicklow County Development Plan 2022 – 2028 (WCDP), and having regard to established and sustainable settlement patterns and the natural environment.

With reference to Fassaroe specifically, the Consultation Portal states as follows:

“significant lands are zoned at Fassaroe west of Bray. These lands are designated to accommodate a significant new residential population and employment opportunities in a high density development surrounding a neighbourhood centre core. The strategy for Fassaroe will be reviewed as part of the preparation of the new plan.”

Questions are posed in relation to the location and densities of future residential development. A number of questions relate to development outside of the existing built-up area and town and village centres. We address a number of the questions hereunder.

2.2 Where in Bray and Enniskerry should higher densities be located? How do we deliver higher densities?

In general, it is considered that the highest densities in Bray should be in the town centre and nearby areas. Lower densities should be accommodated in areas further away from the town centre, albeit still achieving suitable densities in accordance with the recommendations of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, DHLGH, 2024.

The lands at Fassaroe should be developed in accordance with the provisions of the 2024 Guidelines which provide for a wide density range given its location and site characteristics. It is submitted the Bray MD LAP 2025 should require future development applications at Fassaroe to address the provisions of Guidelines in order to justify and support the densities proposed.

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

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.

As noted in the WCDP,

“There is significant potential to deliver compact growth and regeneration in the established town centre and built-up area. Land at the former Bray Golf Course and at the Harbour are designated for high density mixed-use development, while improved town centre functions will be significantly enhanced with the completion of the ‘Bray Town Centre’ (Florentine Centre) on Main Street in 2022.”

The WCDP further notes that,

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.

Lands at Fassaroe are also identified as a critical growth area for the development of Bray in the Eastern and Midlands Regional Spatial and Economic Strategy which states,

“In order for Bray to fulfill 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 . ,”

Focussing new development for Bray at Fassaroe which will be developed in a planned manner with appropriate services and amenities for future residents will avoid unsuitable urban sprawl.

Focussing the growth of Bray at Fassaroe in the context of a sustainable new community has been a strategic policy of WCC since 2009 when the lands were rezoned from industrial and employment uses to residential and employment. Considerable effort has been employed since then by various stakeholders to progress development here, including the provision of public services, consultation and agreement in respect of transportation requirements and progressing development proposals. The Bray MD LAP 2025 should reinforce the commitment to focussing future growth at Bray and providing the necessary supports to deliver development there in the short term.

2.4 What should be the extent and type of development planned for Fassaroe

2.4.1 Land Uses

Borg Developments supports the land use principles provided for in the zoning objectives of the Bray MD LAP 2018 – 2024 and considers that this approach be maintained and provided for in the Bray MD LAP 2025, save for a revision to some of the ‘Employment’ zoned lands at the east to reflect the fact that a Park and Ride facility is now to be provided here.

Figure 2.1 identifies the land use zoning objectives as set out in the 2018 LAP, with one proposed revision to reflect the Park and Ride provision. Otherwise, it is submitted that the zoning objectives mix and layout of the 2018 LAP provide for a suitably planned new neighbourhood with the delivery of essential services and amenities including retail, commercial, education and leisure and recreation uses.

Furthermore, as WCC is aware Borg Development has been developing proposals and has progressed planning applications for the first phase of development at Fassaroe over the lifetime of the Bray MD LAP 2018 – 2024 based on the content of the Bray MD LAP 2018 – 2024 and the associated Bray Environs Transport Study by the NTA. This has required years of consultation with WCC, TII and the NTA and has involved considerable design and environmental assessments with substantial associated costs. The current provisions of the Bray MD LAP 2018 – 2024 have guided the preparation of a Strategic Housing Development application which was lodged with An Bord Pleanála in 2022 (and still awaits a determination). It has also guided the pre-application consultation phase for a proposed LRD application and the issue of an LRD Opinion by WCC in 2024 which will form the basis of an LRD application to be lodged shortly. Given the extent of pre-application work required to bring forward a first phase application for development at Fassaroe (including in particular engagement with transportation stakeholders), it would be contrary to the principles of proper planning and sustainable development to alter the land use planning principles established under the Bray MD LAP 2018 – 2024. In any event it is noted

that there are no altered strategic planning provisions which would require the core land use planning objectives for Fassaroe to be altered in the new Bray MD LAP 2025.

2.4.2 Extent

The Core Strategy of the WCDP identifies a Housing target for Bray of 4,897 No. to 2031 from 2020. It states that the capacity of existing zoned land under the Bray MD LAP 2018 was 6,500 of which 2,000 was within the built-up area and 4,500 outside the built-up area.

On the basis of these figures, the Core Strategy suggests that a total of 2,897 No. housing units shall be provided outside of the built-up area, and that there is a surplus of 40ha of zoned land outside of the existing built-up area.

Borg Developments does not agree with the suggestion of surplus zoned land. This estimate in the Core Strategy was based on population targets grounded in the National Planning Framework (NPF) published in 2018 which were based on 2016 Census information, and which substantially underestimated population growth. The underestimate of population growth has been evidenced by the actual population growth figures recorded in the 2022 Census.

The 2018 NPF provided for a total State population of 5.75 – 5.86 million by 2040. The Revised Draft NPF now provides for a population growth target to 6.1 million by 2040. A significant proportion of this increased population target will arise in the Eastern and Midlands region. This means that the population targets and estimates of land requirements set out in the Core Strategy CDP are substantially underestimated.

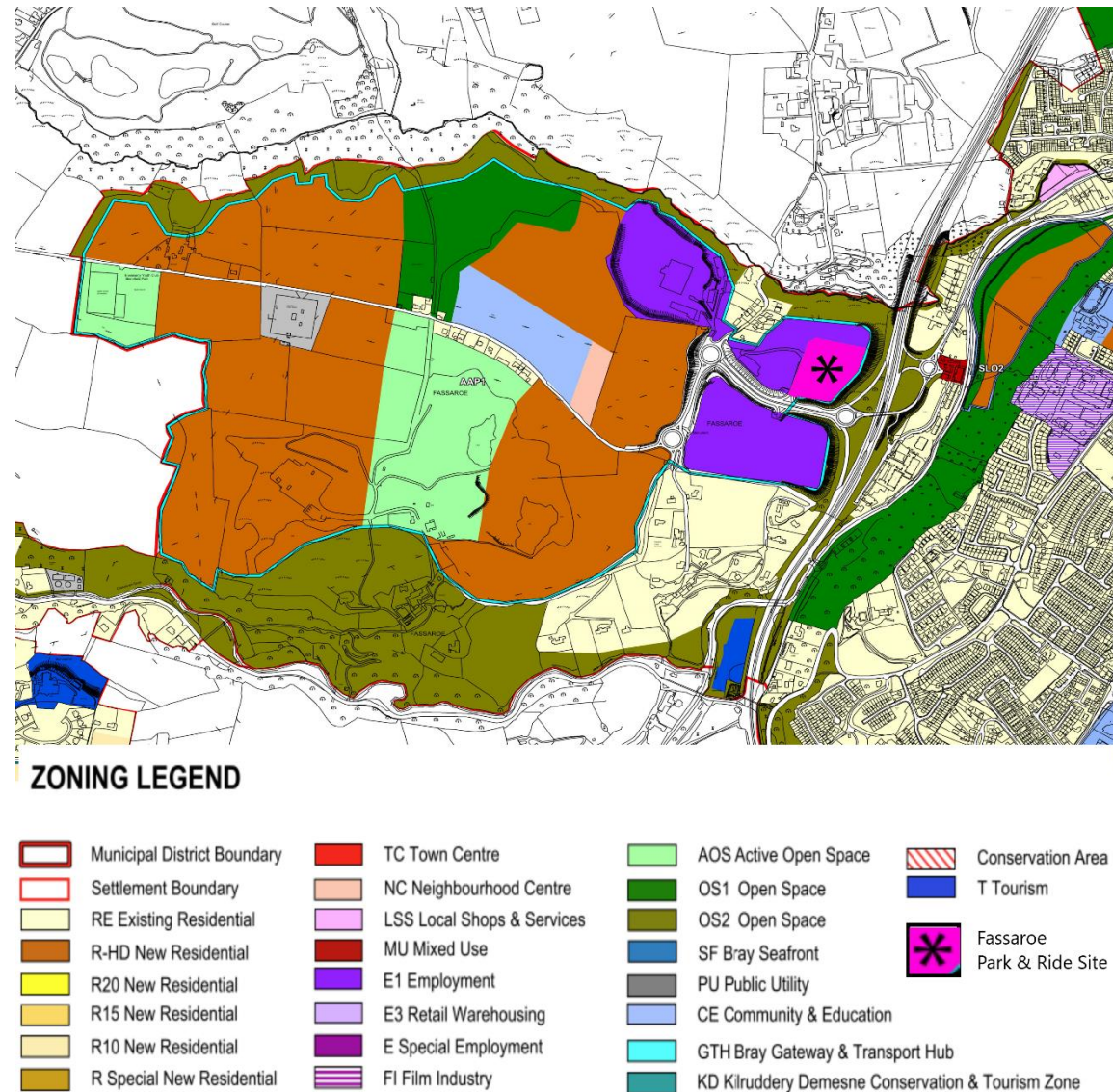


Figure 2-1 Bray MD LAP 2018 – 2024 Zoning Map – As Proposed to be Amended To Reflect Park & Ride Site

As noted in **section 2.3** above, Bray is identified as a Key Town in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. The RSES highlights 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.

To apply the underestimated population growth targets of the current Core Strategy to the Bray MD LAP would result in an inadequate supply of land to fully support and encourage Bray's development as a strategic 'Key Town'.

Furthermore, it is noted that the land requirement estimates of the Core Strategy assume full development of all zoned lands within the built-up area. This would equate to 41% of the target housing units being delivered within the built-up area. It is noted that this is well in excess even of the 30% target of the National Planning Framework for housing in settlements outside of the five cities, and it is considered likely that all of the zoned land within the built-up area will not be developed within the life of the proposed Bray MD LAP. In this regard, it is submitted that the quantum of development to be accommodated within the built up area of Bray is overestimated in the Core Strategy of the WCDP.

It is noted that WCC will propose a Variation of the WCDP to run in parallel with the publication of a draft Bray MD LAP 2025. It is submitted that the surplus quantum should be reconsidered and reduced or removed in the WCDP as part of that review.

In the event that the Planning Authority does maintain any concerns regarding potential residual surplus zoned land in areas outside of the built up area in the context of protecting against urban sprawl, it is noted that the Bray MD LAP 2025 could identify a phased approach to development based on site location, availability or proximity to necessary services and / or ability to provide necessary services which is considered best practice by the 'Development Plan Guidelines for Planning Authorities', DHLGH, 2022.

Section 4.4.1 of the Guidelines state that,

"Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended best practice that a phased approach be taken to prioritise the preferred sequence of development of such sites."

We note that WCC might consider phasing not to be required, if as provided for in the *Development Plan Guidelines for Planning Authorities*,

"the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage".

In either event however, it is noted that it is overarching policy of the Guidelines that,

"It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that its serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning."

On the basis of the foregoing, and for the reasons set out in **section 2.4.1** it is submitted that there should be no alteration to the extent or type of land use zoning objectives provided for at Fassaroe. If the Planning Authority deems it necessary to address the provision of the core strategy that there is a surplus of 40ha (or some lesser amount) of zoned land outside the built up area of Bray, it is submitted that the appropriate way to do this and to provide for logical and orderly growth is to provide for a phased approach to development.

The Borg Development lands at Fassaroe are either currently or are capable of being served by required infrastructure in the immediate term. Critically, Borg Developments owns lands necessary to deliver the local roads infrastructure connecting the N11 to Ballyman Road. The Old Connaught-Woodbrook Water Supply Scheme which provides a long term permanent water supply for the area is to be commissioned shortly. The lands for the reservoirs at Ballyman was provided by the Cosgrave Property Group (CPG) (a sister company of Borg Developments). Access

to foul water infrastructure is available for all of the Borg Developments lands at the Berryfield Lane Roundabout at the western end of Fassaroe Lane. This sewer line was constructed in 1998 by CPG. This sewer system runs under the N11 connecting to the Upper Dargle Road sewer.

2.4.3 Phased Approach to Development

2.4.3.1 Background of Phasing Policy at Fassaroe

The Bray MD LAP 2018 – 2024 included an objective that development within the Fassaroe Action Area should be carried out in phases in the following manner:

Development shall be carried out in phases in the following manner:

Phase 1

- Road link from N11 to Ballyman Road
- Passive park (minimum of 8ha)
- Active Open Space / Sports Zone (minimum of 14 ha)
- Site identified and reserved for school campus
- Neighbourhood Centre Up to 2,000 residential units

Phase 2

- Identification and reservation of site for additional primary school
- Remainder of residential units

A further objective of the Bray MD LAP 2018 – 2024 was that,

“All new development shall be accompanied by appropriate transport services, the format and scale of which shall be in accordance with the Bray and Environs Local Transport Study (to be carried out by the NTA in collaboration with Wicklow County Council and Transport Infrastructure Ireland). Developers shall be responsible for the provision and funding of the required transport services until such a time as public services are extended to the area.”

The Bray Environs Transport Study (BETS) was published in 2019 and included provisions for a first phase of development at Fassaroe of 650 No. units which would be supported by TII and NTA in the event that a number of transportation objectives were delivered to support the

application. This study was prepared by the NTA in consultation with TII, WCC and Dún Laoghaire Rathdown County Council following considerable consultation.

In the course of pre-application consultation with WCC and An Bord Pleanála for both an SHD application in 2022 and a proposed LRD application in 2024 a first phase of development with a maximum of 650 No. units only was supported in line with the provisions of the BETS, and on the grounds that specified transportation objectives were delivered. Agreement in respect of the further transportation objectives to support the first phase of development took a considerable period of time to be achieved between the applicant, WCC, TII and NTA. The general phasing of the BETS has guided and informed an LRD Opinion issued by WCC recently for a phase 1 LRD application for development at Fassaroe (comprising largely of the development content as the previously lodged SHD application).

The Bray MD LAP 2018 – 2024 identifies a number of development / infrastructure requirements which are necessary to accommodate any / a first phase of development at Fassaroe. These are:

- Road link from N11 to Ballyman Road
- Passive park (minimum of 8ha) and Active Open Space / Sports Zone (minimum of 14 ha) – this quantum was identified in relation to a phase 1 development of 2,000 residential units.
- Site identified and reserved for school campus
- Neighbourhood Centre

Other infrastructural requirements for the overall development of Fassaroe comprise:

- Provision shall be made for a north – south link route from the new distributor road to cross Ballyman Glen and continue in County Dublin and link up with old Conna Avenue.
- The development of this area shall make provision for Luas or other mass transit public transport services, and any necessary infrastructure such as depots / stabling.

2.4.3.2 Potential Phasing Approach

As noted above, section 4.4.1 of the ‘*Development Plan Guidelines for Planning Authorities*’, DHLGH, 2022 advises that a phased approach to development is recommended in cases where there may be a surplus of zoned land to meet housing targets.

Furthermore, and separately, given the overall scale of zoned lands at Fassaroe, and given the need for a significant amount of service and infrastructure provision within the Fassaroe lands to facilitate a first phase of development, it is reasonable, logical and sustainable that a phased approach to development be set out.

We note the following further provision of section 4.4.1 of the ‘*Development Plan Guidelines for Planning Authorities*’ which addresses matters to be considered in developing phasing proposals. It states,

“phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure. This should also be viewed in the context of the urgent need to increase housing supply.”

We would add to this that it should also have regard to landownership and to how infrastructure necessary to serve the entirety of a new development area is provided and by whom it can be and is provided.

Having regard to the existing phasing policy for development at Fassaroe as provided for in the BETS and the Bray MD LAP 2018, along with the recommendations of the *Development Plan Guidelines for Planning Authorities*, we set out below what is considered to be a reasonable, logical and sustainable approach to development phasing at Fassaroe.

Initial Phases of Development

The location and extent of area suitable for initial development at Fassaroe is logically informed by a number of development requirements for any development at Fassaroe. These key items were previously identified in the Bray MD LAP 2018 and remain valid:

- **Road link from N11 to Ballyman Road:** This is a requirement for any development at Bray. In line with the provisions of the *Development Plan Guidelines*, land with the capacity to provide this necessary infrastructure and which is proximate to this infrastructure should be identified for early development. It should be noted that the Borg Developments owned parcel of land has the capacity to deliver the full extent of this route.
- **Passive and Active Open Space:** There is over 22 ha of land at Fassaroe zoned OS1 or AOS under the Bray MD LAP 2018 - 2024. Part of the lands which are zoned OS1 are the site of historic landfill sites which must be remediated by WCC in line with Certificates of Authorisation which have been approved by the EPA. It is necessary for these landfill sites to be remediated prior to the provision of new development on nearby lands at Fassaroe. Once remediated these lands can readily be laid out for open space / district park purposes. In line with the provisions of the *Development Plan Guidelines for Planning Authorities*, land proximate to this early delivered open space infrastructure should be identified for early development. The central passive open space areas (OS1) fall within the ownership of and can be delivered by Borg Developments.
- **Site identified and reserved for school campus:** Lands zoned under the Bray MD LAP 2018 – 2024 for community and education are of a sufficient scale to accommodate a multi school campus (with both primary and secondary schools) to the standards required by the Department of Education. This area is centrally and suitably located within the overall Fassaroe lands next to the zoned Neighbourhood Centre site and the passive open space zoned / district park area. In line with the provisions of the *Development Plan Guidelines for Planning Authorities*, land with the capacity to provide this necessary infrastructure and which is proximate to this infrastructure should be identified for early development. In this regard it is noted that the zoned community and education lands fall within the Borg Developments parcel of land.

Furthermore, Borg Developments has a contract in place with the Department of Education for the sale of this area of land in the

event that permission is secured at the site for a first phase of development, include the necessary roads infrastructure to access the school site.

- **Neighbourhood Centre:** Lands zoned under the Bray MD LAP 2018 – 2024 for neighbourhood centre are of a sufficient scale to accommodate an appropriately scaled neighbourhood centre (with a mix of residential use also provided for) which will provide a suitable level of service for future Fassaroe residents but will not adversely impact on retail provision of Bray town centre. This area is centrally and suitably located within the overall Fassaroe lands next to the zoned community and education site, close to employment zoned lands to the east and close to where a possible future north-south public transport link across Ballyman Glen could potentially be accommodated. In line with the provisions of the *Development Plan Guidelines for Planning Authorities*, land with the capacity to provide necessary neighbourhood services in an initial phase of development and proximate to same should be identified for early development.

All of these key development requirements fall within the Borg Developments parcel of land and will be delivered as part of a first phase of development (see **Figure 2.2**, Phasing Map 1 of a series of phasing maps to follow). In line with the provisions of the *Development Plan Guidelines*, lands that can deliver, and which are proximate to, these services and infrastructure should be identified for early development, i.e. phase 1 (see **Figure 2.3**, Phasing Map 2).

It is acknowledged that the overall Borg Developments lands in the vicinity of these services / infrastructure has capacity to deliver in excess of 650 No. units which has been identified in BETS (following consultation and agreement of NTA, TII, DLRCC and WCC) as an appropriate quantum of development for an initial phase of development. Accordingly, it is considered appropriate that the Borg Developments lands be divided into two sub-phases where Phase 1a could accommodate 650 No. dwellings and would be based on an east-west sequence of development from the eastern side of Fassaroe closest to Bray and the Fassaroe employment zoned lands and also a sequential approach extending from the key

services and infrastructure provision of the central east west road link, the neighbourhood centre, the school site and the passive district park. Such an area is identified on **Figure 2.4**, Phasing Map 3 as Phase 1a. The rest of the Phase 1b lands, (adopting a sequential approach within the overall Phase 1 lands proximate to the Phase 1 infrastructure, and in particular delivering development along the east west link road) are identified on **Figure 2.5**, Phasing Map 4.

Further Phases of Development

Figure 2.6, Phasing Map 5 identifies the rest of the lands at Fassaroe for later development. These lands are not capable of delivering the Phase 1 services / infrastructure requirements and much of them are more distantly located from the key infrastructure which will be provided in Phase 1. It is noted in particular that they are dependent on the previous delivery of roads infrastructure within the Borg Developments lands. They would also be dependent on the previous delivery of key retail, educational and recreational services and amenities that fall within the Borg Developments land ownership.

Overall Phases

Finally Phasing Map 6 at **Figure 2.7** presents a combined view of the overall proposed phasing for Fassaroe.

1.0 PHASE 1 INFRASTRUCTURE REQUIREMENTS

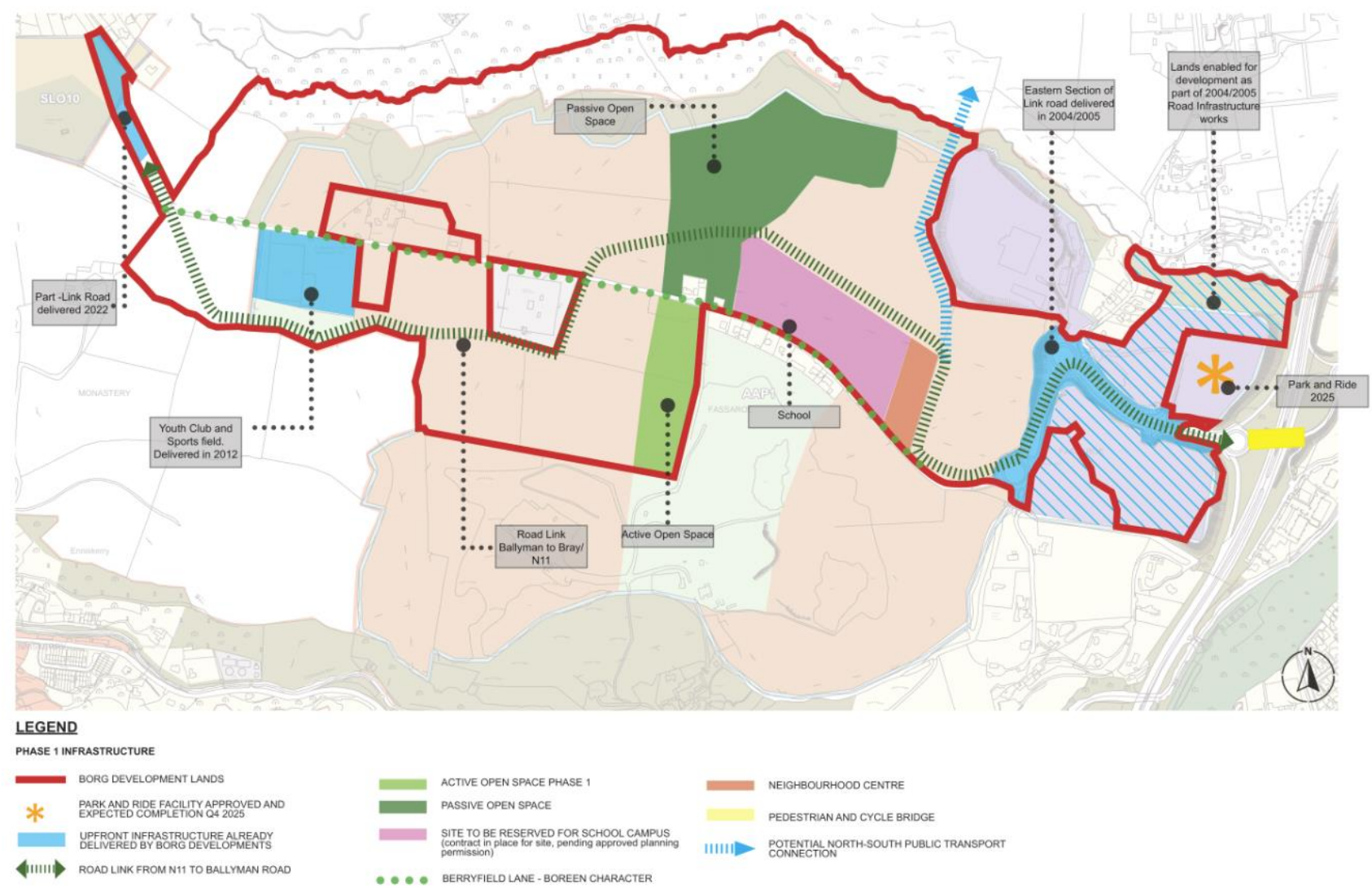


Figure 2-2: Phasing Map 1 - Phase 1 Infrastructural Requirements

2.0 PHASE 1: DEVELOPMENT AREAS PROXIMATE TO PHASE 1 INFRASTRUCTURE PROVISION

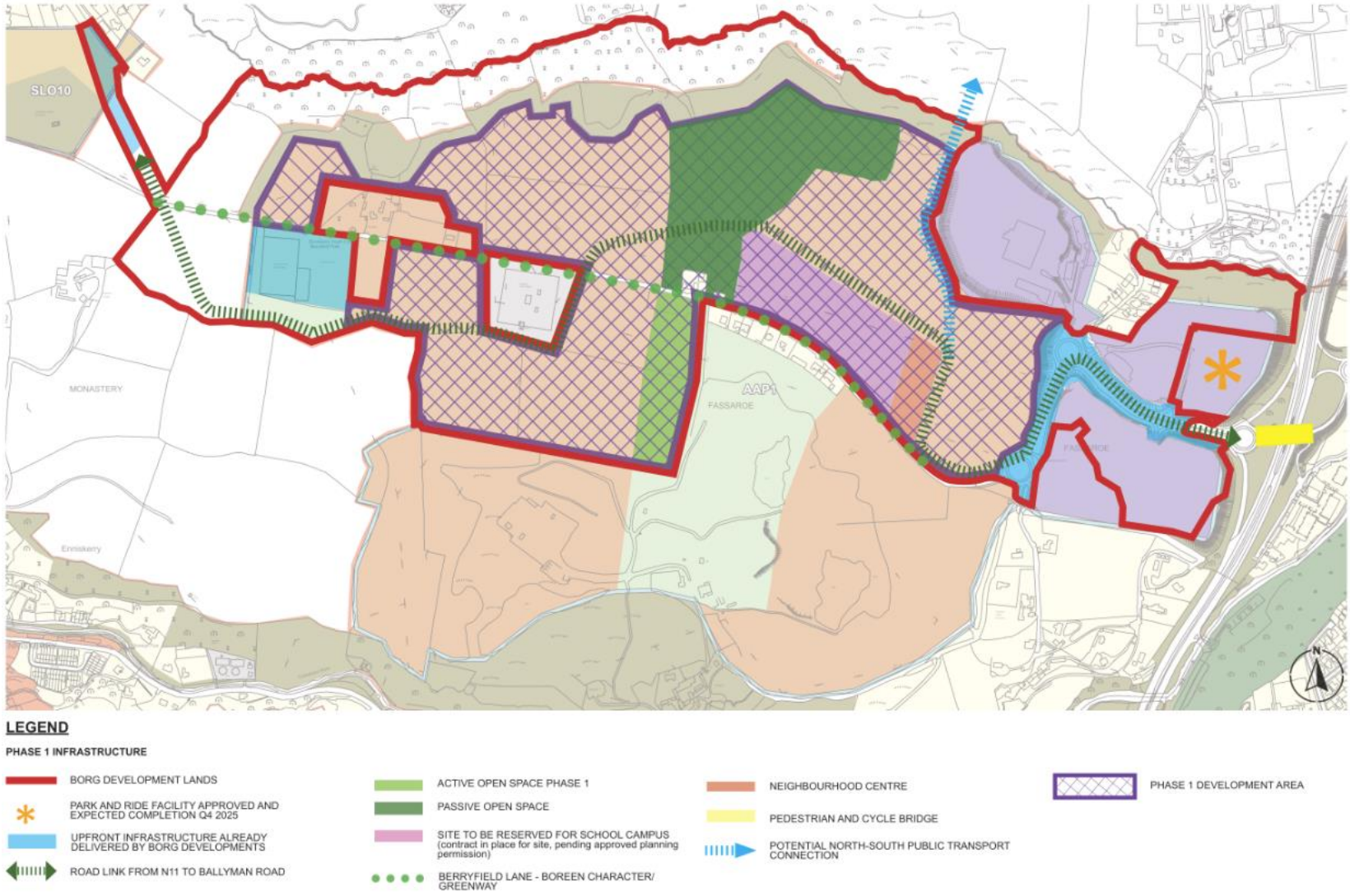


Figure 2-3: Phasing Map 2 - Development Areas Proximate to Phase 1 Infrastructure Provision

3.0 PHASE 1A: ADOPTING A SEQUENTIAL APPROACH

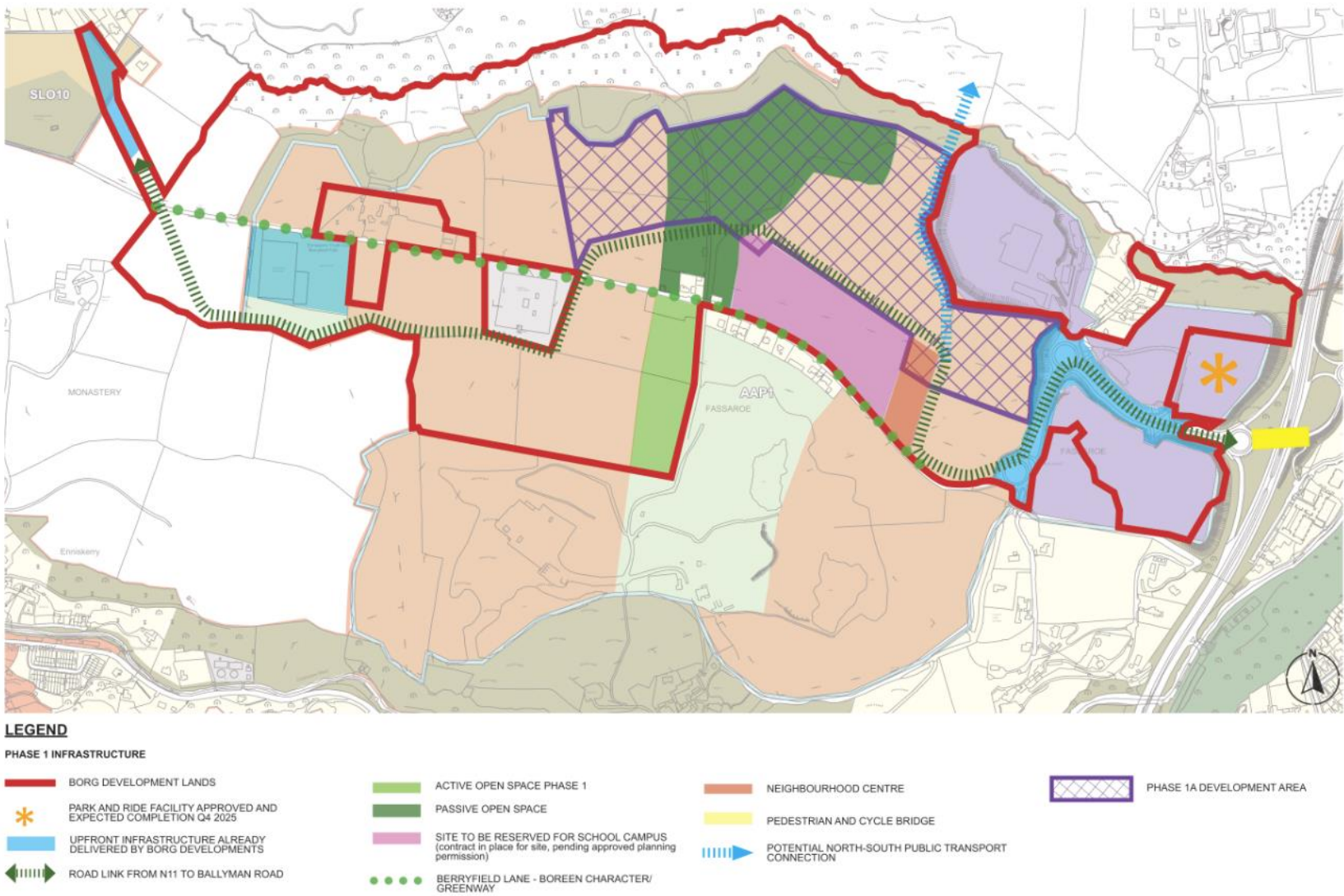


Figure 2-4: Phasing Map 3 - Phase 1A Adopting a Sequential Approach

4.0 PHASE 1B: ADOPTING A SEQUENTIAL APPROACH

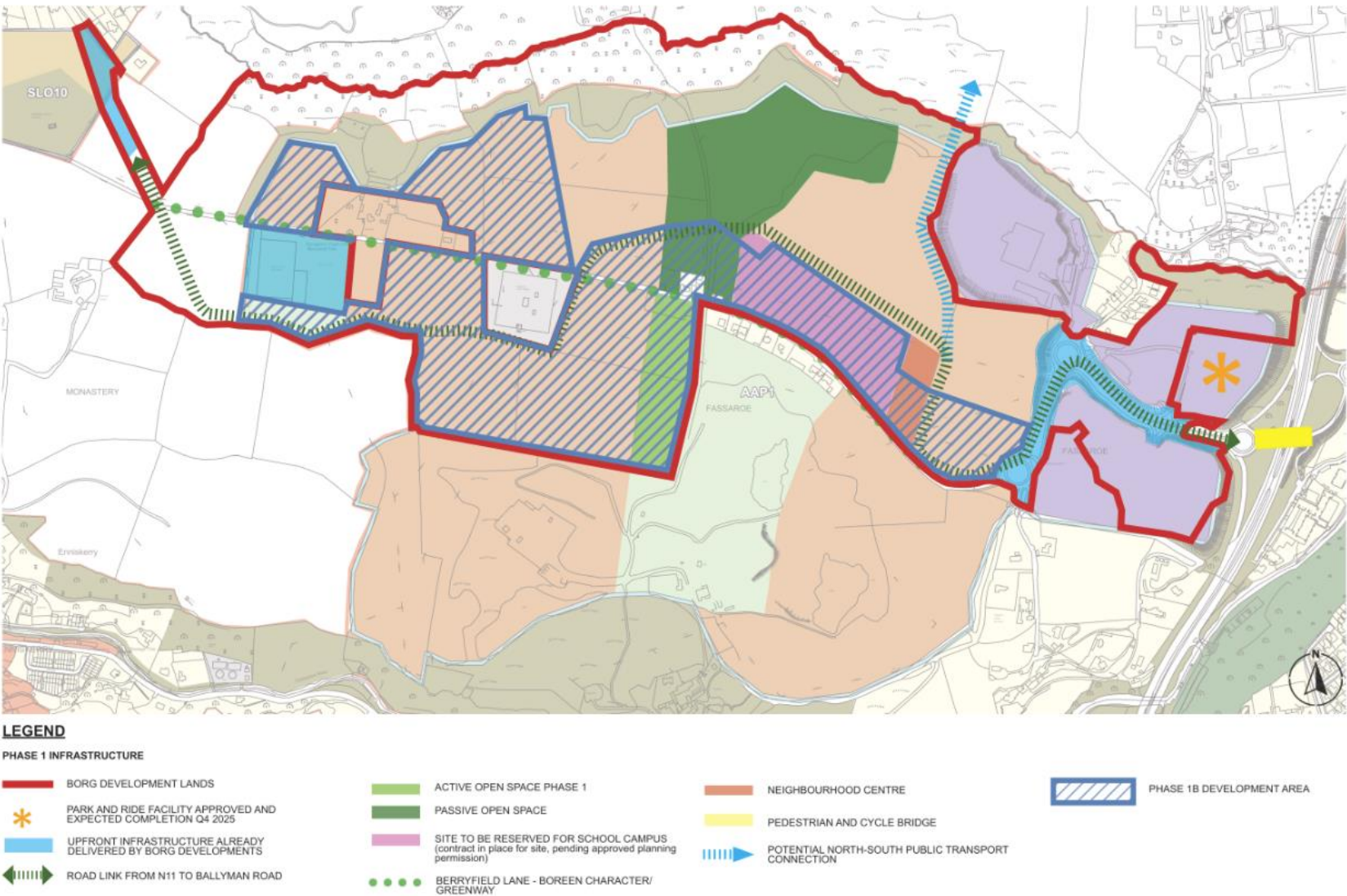


Figure 2-5: Phasing Map 4 - Phase 1B Adopting a Sequential Approach

5.0 PHASE 2: FURTHER PHASES OF DEVELOPMENT

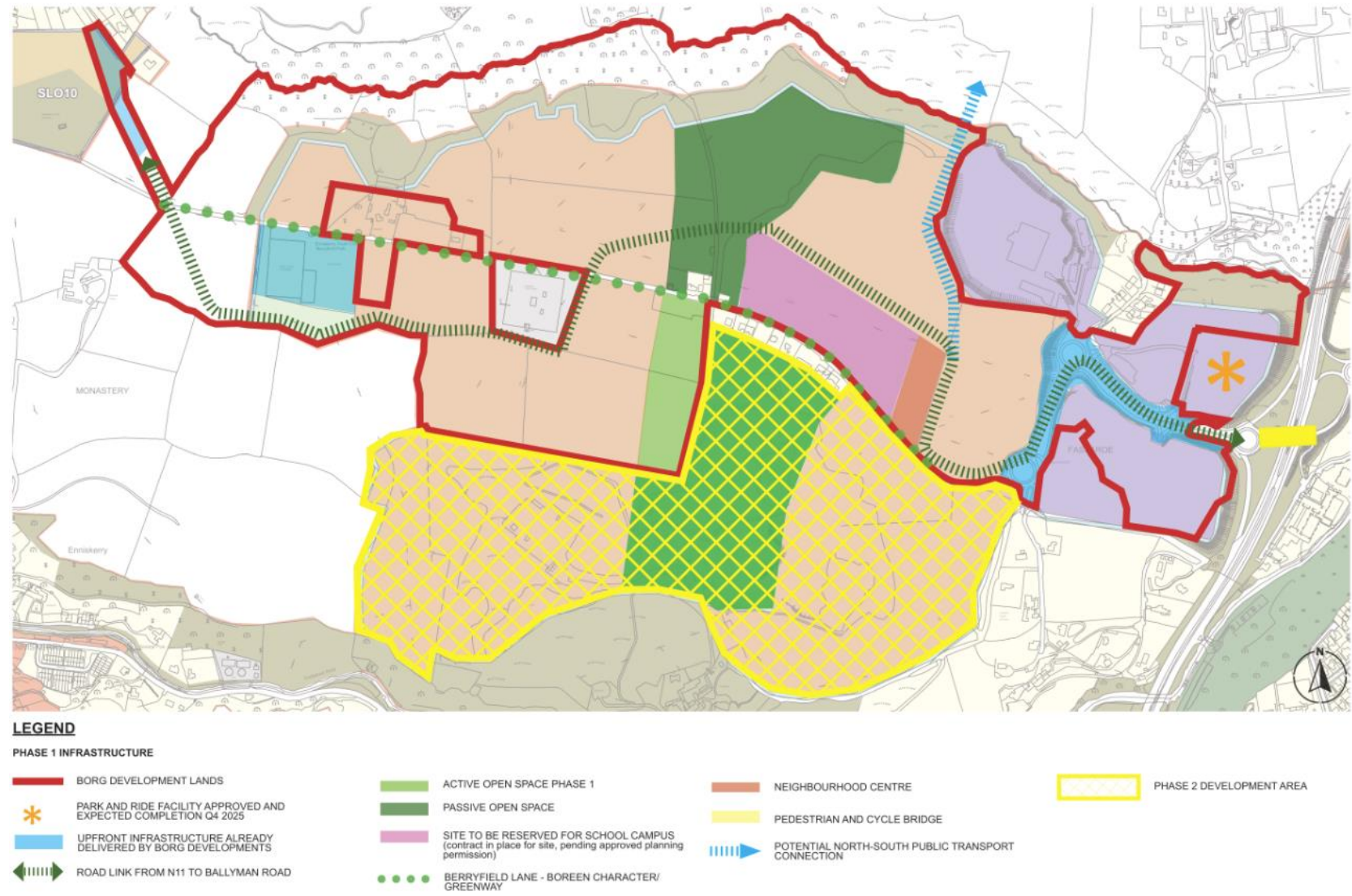


Figure 2-6: Phasing Map 5 - Phase 2, Further Phases of Development

6.0 COMPOSITE PHASES FOR OVERALL FASSAROE LANDS

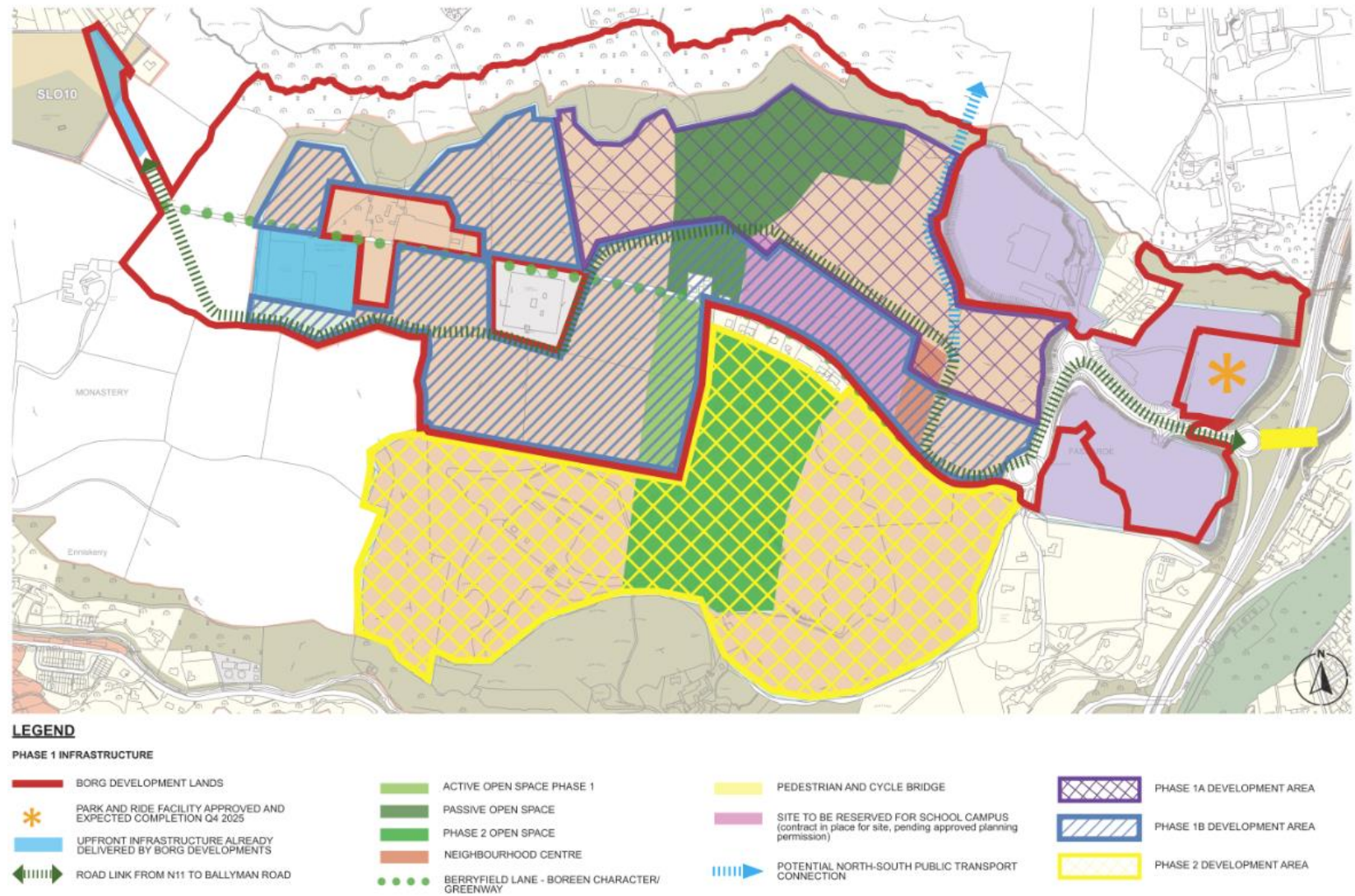


Figure 2-7: Phasing Map 6 Combined Proposed Phasing for Fassaroelands

2.4.4 Infrastructural Requirements To Facilitate Development At Fassaroe

As indicated in **section 2.5.1** above, the BETS sets out a number of transportation requirements for a Phase 1a development of 650 No. units at Fassaroe. WCC, ABP, TII and NTA have repeated these requirements to Borg Developments in the course of previous pre-application consultation for a Phase 1 application.

While most of these requirements remain valid and appropriately clarify the requirements of the TII and NTA for a Phase 1a development at Fassaroe, it is noted that a number are no longer fully applicable as stated.

The Table 3.1 Requirements of BETS are as shown in **Table 2.1** below.

Infrastructure or Service	Delivery Process	Work Commenced	Completed to a Standard to be Taken in Charge
Fassaroe Development Roads	Part of Planning Application	Prior to Occupation of any dwellings	Prior to Occupation of any dwellings
N11 Cycle and Pedestrian Bridge	Part of Planning Application	Prior to Occupation of any dwellings	Prior to Occupation of any dwellings

- b) *cycling trips to all local services within Fassaroe;*
- c) *That the applicant will provide a bus service for Bray DART station in advance of demand justifying public investment as part of the expansion of the bus network under BusConnects;*
- d) *That the applicant has fully assessed a requirement for a bus service to Bride's Glen or Cherrywood Luas and provides same if demand is deemed sufficient in advance of demand justifying public investment as part of the expansion of the bus network under BusConnects;*
- e) *That the applicant demonstrates how demand for travel to school from Fassaroe can be accommodated without undue recourse to the private car;*

We believe that, as a general principle, the delivery of the infrastructure measures outlined in the BETS provides an appropriate mechanism for the first phase of the Fassaroe development. If these measures are delivered, they will demonstrate that the first phase of development can align with

Traffic Management Measures at Fassaroe Interchange arising from the development	Wicklow County Council Traffic Management System Framework to be agreed with TII within 2 months of the agreement of the Bray Study	Prior to Occupation of any dwellings	Prior to Occupation of any dwellings
New bus services in line with demand	Part of Planning Application with agreement of NTA	Phased introduction as dwellings are completed	n/a
Bus Priority on Upper Dargle Road including the approach to Sunnybank Junction	In conjunction with Phase 1(a) development	Prior to occupation of any dwellings	n/a – WCC Scheme
Bus priority on Dublin Road – Castle Street	Prior to occupation of 50% of Development	Prior to occupation of 100% of Development	n/a – WCC / NTA Scheme

Table 2-1: Transportation Requirements for Fassaroe Phase 1a Development as Set out in Bray Environs Transport Study

(Source: *Bray Environs Transport Study*, NTA, 2019)

In addition to these requirements section 3.2 of the BETS states that for development to proceed the following must also be demonstrated:

- a) *That the proposed development provides fully for walking and both the Transport Strategy for the Greater Dublin Area and the DHPLG's Spatial Planning and National Roads Guidelines for Planning Authorities.*

However, in light of some altered circumstances currently prevailing (since the adoption of BETS in 2019), we wish to highlight a number of points in respect of the BETS Phase 1a requirements, including some recommended modifications.

Fassaroe Development Roads

There is a significant discrepancy between the BETS requirement and the Bray MD LAP (2018-2024) for the Phase 1 road infrastructure. The Bray MD LAP stipulates a requirement for a road link from the N11 to Ballyman Road, whereas BETS specifies a requirement for the 'Fassaroe Development Roads', which could be interpreted as only the roads necessary to facilitate the Phase 1 development (i.e., a connection to the N11, but not necessarily to Ballyman Road).

Our assessment indicates that for Phase 1a development which will largely be focussed on the eastern side of Fassaroe, a full connection from the N11 to Ballyman Road is not required at this stage. The inclusion of this road extension fully to Ballyman Road imposes a significant burden on the developer in terms of infrastructure, cost, and project timeline for a Phase 1a development of 650 No. units. We propose instead that the connection to Ballyman Road should only be required before the occupation of the Phase 1b lands as presented in **section 2.4.3.2** above. This approach ensures that the link is delivered at a time that aligns with demand, yet still within the timeline of the order of development envisaged as a Phase 1 development in the Bray MD LAP 2018 – 2024 (i.e. 2,000 No. residential units).

Traffic Management Measures at Fassaroe Interchange

We note that a series of traffic management measures for Junction 6 (Fassaroe) has already been agreed between TII, NTA, and WCC. These measures were agreed in 2021 following the preparation of a transport study including traffic modelling on behalf of WCC and further to detailed consultation between all three stakeholders. The transport study supporting the traffic management measures which were agreed shows that up to 1,300 units can be accommodated without any adverse impacts on the N11 mainline, provided that the appropriate traffic management measures are implemented as agreed.

The Bray MD LAP 2025 should note that these measures have been agreed between the relevant parties and could be implemented prior to first occupation of dwelling at Fassaroe if deemed necessary only at that juncture. This provides certainty that a Phase1 application could be developed without adversely impacting on the N11 mainline and or Fassaroe Junction 6 arrangements.

New Bus Services in Line with Demand

A Public Transport Access Strategy (PTAS) has been developed by Borg Developments, in consultation with the NTA and WCC, to form part of the forthcoming LRD application (for which WCC has issued an LRD Opinion). This PTAS is an updated version of a previous PTAS agreed upon for the Phase 1 SHD application lodged in 2022 and which is still under consideration by ABP. The PTAS outlines a clear bus service strategy designed to deliver connectivity between Fassaroe, Bray, and Dublin City

Centre. This strategy also incorporates the approved Part 8 Park and Ride (P&R) scheme, which will provide express bus services to and from Dublin City Centre.

The Bray MD LAP 2025 should note that these measures have been agreed between the relevant parties and that they can be delivered in a phased manner in line with demand as set out in BETS Table 3-1.

Bus Priority on Upper Dargle Road (Including Approach to Sunnybank Junction)

As part of the PTAS strategy for Fassaroe Phase 1a, Borg Developments acknowledges the importance of ensuring reliable bus journey times along Upper Dargle Road, particularly as it connects Fassaroe to Bray. According to BETS, Wicklow County Council is responsible for the delivery of this scheme. We note that BETS states that these works should commence prior to the occupation of any dwellings. We respectfully request that this be revised to specify that works should commence prior to the occupation of 100% of dwellings. This adjustment ensures that this third-party measure does not unduly delay or disrupt the development timeline at Fassaroe, and the responsibility for ensuring the delivery of the objective is clearly vested in WCC. It would also bring the bus priority measure in line with the requirements for Dublin Road / Castle Street.

Bus Priority on Dublin Road – Castle Street

The current Bray to City Centre BusConnects application with ABP outlines bus priority measures along the Dublin Road corridor, including the Dublin Road / Castle Street section. However, the NTA has indicated that they will only procure two BusConnects Corridor projects at a time, and as of now, the design and build contracts for the first two corridors have not been issued. Given this uncertainty regarding the timeline for the Bray scheme, we recommend that, to avoid delays in the development at Fassaroe, WCC, in collaboration with the NTA, progress a standalone project to implement bus priority measures at this location in advance of the Bray Scheme works.

Bus Service to Bride's Glen or Cherrywood Luas

Regarding the requirement for a bus service to Bride's Glen or Cherrywood Luas (Section 3.2 Item C of BETS), the PTAS developed for the Phase 1 LRD application, which was agreed upon with the NTA and WCC, indicates that there is insufficient demand for such a service at this stage. The

demand is adequately addressed by bus services operating from the Park and Ride at Fassaroe to Dublin City Centre. Therefore, we recommend that this requirement be removed for the Phase 1a development.

3 CONCLUSION

Borg Developments looks forward to the timely publication of a Draft Local Area Plan for Bray Municipal District. The key matters which Borg Developments seeks to be addressed in the Draft Bray MD LAP 2025 are:

- Review of the Core Strategy of the Wicklow County Development Plan 2022 with regard to what it identified as surplus zoned lands in the context of:
 - increased population targets now identified in the Draft Revised National Planning Framework and its implications for increased population growth throughout the Eastern and Midlands Region.
 - The unlikely build out of all zoned lands within the built up area within the life of the LAP.

In this regard it is submitted that the identified surplus should be removed or reduced.

- Adherence to the policy and objective of the *Development Plan Guidelines for Planning Authorities* that,

“zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.”

In this regard the entirety of Borg Developments lands at Fassaroe are and will be serviced in the immediate term sufficient for their full build out. Critically, Borg Developments is the owner of lands on which it can deliver the east west link road from the N11 to Ballyman Road. It has previously provided foul sewerage connection from Fassaroe to Dargle Road and has provided land for the construction of the reservoirs of the Old Connaught-Woodbrook Water Supply Scheme which will shortly be commissioned and serve the full development of Fassaroe.

- If a phased approach to development is deemed necessary at Fassaroe the first phase of development should be delivered on lands within which critical services and infrastructure will be developed, and in the areas proximate to same. The key amenity services and infrastructure required to be delivered to create a sustainable new

community at Fassaroe are all located within the Borg Development lands at Fassaroe. The Borg Development lands therefore should be confirmed for Phase 1 development. In line with previous agreements with TII, NTA and WCC a Phase 1a area of land to facilitate a first phase development of approximately 650 No. units would appropriately be located in the eastern and central parts of the Borg Developments lands with the remainder of the Borg Development lands along the east-west link road in the central and western parts of the Borg Development lands forming Phase 1b.