

Leonora Earls

From: ForwardPlanning [ForwardPlanning@housing.gov.ie]
Sent: 09 March 2018 15:32
To: Planning - Plan Review
Subject: DHPLG Submission on Material Alterations to Draft Bray Municipal District Local Area Plan 2018-2024
Attachments: DHPLG Submission 09 March 2018 Mat Alts Bray LAP 2018-2024.pdf; ATT00001.txt; ATT00002.htm

To Whom It May Concern,

Please find attached submission from the Department of Housing, Planning & Local Government on the Material Alterations to Draft Bray Municipal District Local Area Plan 2018-2024.

I would be very grateful for confirmation of receipt of the attached submission.

Kind Regards

Ciara

Ciara Gilgunn
Forward Planning Section

Planning & Housing Market Policy and Land Management Division | Department of Housing, Planning and Local Government | Custom House | Dublin 1 | +353 (0) 1 8882418



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



09 March, 2018

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

**Re: Material Alterations to the Draft Bray Municipal District
Local Area Plan 2018-2024**

A Chara

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department of Housing, Planning and Local Government notes the additional and amended objectives included in the Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan (LAP) 2018-2024 and welcomes the responses made to issues raised in the Departments previous submission on the Draft LAP on 15th September last.

The Department also however notes Proposed Material Alteration No. 1 which concerns the extension of the Kilmacanogue development area southwards to reach and incorporate the Kilmurray area.

This zoning extension would significantly expand the '*Tertiary Development Zone*' southwards from Kilmacanogue paralleling the N11 and would permit additional housing and other development in an area not designated for new development under the County Development Plan (CDP) core strategy.

Kilmacanogue is designated as a *Level 6 Rural Town* in the core strategy of the Wicklow CDP 2016-2022 and includes a Specific Development Objective to consolidate and grow the settlement at site 'KM1' on the north western side for 25 new dwellings.

To the contrary, proposed Material Alteration No. 1 seeks to extend Kilmacanogue southwards along a rural road to reach Kilmurray which is designated as a *Level 9 – Rural Cluster* in the Wicklow CDP 2016-2022 and '*considered suitable for very limited new rural development, with the main purpose of the designation being to direct rural generated housing into clusters rather than the open countryside*' (Chapter 3 of the CDP).

The Department is strongly of the view that Material Alteration No.1 is not justified with respect to the zoning assessment criteria of the *Development Plans Guidelines, 2007* in terms of housing need, policy, infrastructure provision, sequential approach or protection of natural heritage.

Moreover, Material Alteration No.1 is also not consistent with the designation of Kilmacanogue as Level 6 Rural Town or Kilmurray as a Level 9 Rural Cluster in the Core Strategy of the Wicklow CDP 2016-2022.

Accordingly and to ensure the plan as adopted is compliant with statutory requirements in relation to consistency of plans between the various tiers of the planning policy structure, your authority must not adopt this alteration and should remove this proposed zoning objective from the Local Area Plan.

Failure by your authority to ensure statutory requirements are observed may result in the consideration, by the Minister, of the use of the powers available under Section 31 of the Act.

The officials of the Department are available to discuss the matters raised above and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,



Niall Cussen
Principal Advisor,
Forward Planning Section

Leonora Earls

From: David Clements [David.Clements@nationaltransport.ie]
Sent: 09 March 2018 16:37
To: Planning - Plan Review
Subject: NTA Submission - Bray MD LAP Material Amendments
Attachments: NTA Submission - Bray Municipal District Local Area Plan Material Alterations.pdf

Dear Sir / Madam,

Please find attached the NTA's submission on the Material Amendments to the Bray Municipal District Local Area Plan. Can you please confirm receipt at your earliest convenience.

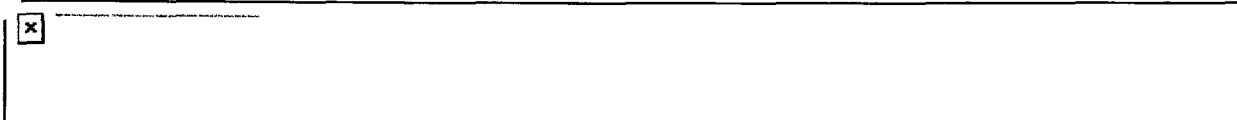
Regards

David Clements
Land Use & Transport Planner
Transport Planning and Capital Investment



Dún Scéine
Iveagh Court
Harcourt Lane
Dublin 2

Tel: + 353 (0)1 879 8305
Email: david.clements@nationaltransport.ie
Web: www.nationaltransport.ie



Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Administrative Officer,
Planning Department,
Wicklow County Council,
Wicklow Town.

9th March 2018

Dún Scéine, Cúirt Uíbh Eachach,
Lána Fhearchair, Baile Átha Cliath 2,
D02 WT20

Dún Scéine, Iveagh Court,
Harcourt Lane, Dublin 2,
D02 WT20

t 01 879 8300

f 01 879 8333

info@nationaltransport.ie

www.nationaltransport.ie

RE: Bray Municipal District Local Area Plan Material Alterations

Dear Sir/Madam,

The National Transport Authority (the "NTA") welcomes the opportunity to comment on the Material Alterations to the Draft Bray Municipal District Local Area Plan (LAP).

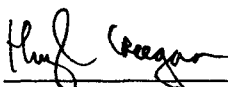
The NTA are satisfied that the recommendations made in our submission on the Draft Local Area Plan have been taken on board, insofar as they relate to public transport, walking and cycling, and regional and local roads. The NTA notes that the detailed recommendation related to the upgrading of the N/M11 has not been incorporated but is satisfied that the plan, as altered, can adequately reflect the findings of the Transport Infrastructure Ireland Corridor Study – Needs Assessment Report.

Bray and Environs Local Transport Study

In our submission on the Draft Local Area Plan, it was stated that the on-going NTA study may have "additional implications for transport policy and objectives in the Municipal District which will need to be taken on board as part of the LAP process". The NTA welcomes the clear commitment from Wicklow County Council to update and amend the Local Area plan if necessary in order to provide a statutory planning basis for the study. As such, it is recommended that the text relating to the study within Section 2.2 of Material Alteration 30 (Appendix D) is included in the final plan.

I trust that the views of the Authority will be taken into account in the finalisation of the Bray Municipal District Local Area Plan.

Yours sincerely,



p.p. **Michael MacAree**
Head of Planning and Data Analysis

Leonora Earls

From: Environmental Co-ordination (Inbox) [Environmental_Co-ordination@agriculture.gov.ie]
Sent: 07 March 2018 15:02
To: Planning - Plan Review
Subject: Public Consultation on Proposed Alteration to Bray LAP

To whom it concerns,

I refer to your recent correspondence concerning the above and wish to state that at this time the Department of Agriculture, Food and the Marine has no submissions or observations in regards to same.

Yours sincerely,

Liz McDonnell

Liz McDonnell | Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division | Department of Agriculture, Food and the Marine | Pavilion A | Grattan Business Centre | Portlaoise | Co. Laois | 057 8689915 | E; environmentalco-ordination@agriculture.gov.ie

From: Catherine McDonald [<mailto:CMcDonal@wicklowcoco.ie>]
Sent: 15 February 2018 11:55
To: McDonnell, Liz
Subject:

**DRAFT BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018 – 2024
PROPOSED ALTERATIONS - PUBLIC CONSULTATION**

Dear Sir or Madam,

Pursuant to Section 20 of the Planning and Development Act 2000 (as amended), please log onto the following link to view the public notice and the proposed material alterations to the draft Bray Municipal District LAP 2018 and the LAP documents <http://www.wicklow.ie/bray-municipal-district-local-area-plan-2018>

SUBMISSIONS ARE INVITED on the proposed alterations and associated SEA, AA and FRA Addendums from 09 February 2018 to **09 March 2018** (5pm). Submissions may be made by either **Writing to:** BRAY LAP, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town or **Emailing to:** planreview@wicklowcoco.ie

Yours sincerely

*****" This message is intended only for the use of the person(s) (\\the intended recipient(s)\\") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Wicklow Local Authorities. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as Wicklow Local Authorities do not accept any liability for contamination or damage to your systems.

***** Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de harr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin

seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceanglán leis, faoi phribhléid agus faoi rún agus le h-aghaidh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.



An Roinn
Cultúir, Oidhreachta agus Gaeltachta

Department of
Culture, Heritage and the Gaeltacht

A4

08 March 2018

FP2018/022

Wicklow County Council
Planning Department
Wicklow County Council
Station Road
Wicklow Town

Proposed material alterations to the draft Bray Municipal District LAP 2018

A Chara,

I refer to the Council's notification in relation to the above-proposed material alterations.

Outlined below are the nature conservation observations of the Department of Culture, Heritage, and the Gaeltacht.

This Department previously commented on the Draft Plan, our reference FP2017/081, dated 29th August 2017. A number of concerns were addressed regarding possible negative impacts on the natural heritage and/or European sites from greenways, roads and residential development, in particular impacts from policies such as RO4, RO7, RO9, GI5, RN3. In addition the SEA did not include all the potential impacts that were listed in the NIR.

The current documents sent to this /Department consist of proposed material alterations to the draft LAP and it is not clear that the concerns of this Department have been adequately dealt with.

Where there have been amendments to deal with some of the above concerns the result appears to push the assessment to project level. For example material alterations no. 16 and 17, on page 28 point 10 and page 31 11th bullet point, propose a review of the existing hydrogeological assessments and carrying out a new hydrogeological assessment(s) to inform the development of appropriate SUDS system(s) at Fassaroe and Parknasilloge to protect Ballyman and Knocksink SACs. This Department would have expected that adequate assessments would have taken place before any decision to zone the area for development in order to remove any risk that it could not be developed due to impacts on groundwater.

Similarly, for proposed material alteration no. 15, with regard to possible impacts on Knocksink Wood SAC and Nature Reserve, the route selection and assessments have been pushed down to project level.

While this Department acknowledges that detailed assessments and route selection will have to be left to project level, it should also be possible to carry out assessments at Plan level. Such an assessment could flag options that are not viable. The absence of such assessments not only raises doubts as to the adequacy of the original NIR, but could also pose a risk to projects.

This Department recommends that Wicklow County Council should satisfy itself that it has adequately dealt with the concerns of this Department in its original submission.

Kindly forward any further information received; or in the event of a decision being made a copy of same should be forwarded to the following address as soon as it issues:

**The Manager,
Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht,
Newtown Road,
Wexford Y35 AP90**

Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@chg.gov.ie

In addition, please acknowledge receipt of these observations by return.

Is mise le meas,

A handwritten signature in black ink, appearing to read "Michael Murphy". The signature is written in a cursive style with a large, stylized initial 'M'.

**Michael Murphy,
Development Applications Unit
Tel: (053) 911 7516**

Leonora Earls

From: David Galvin [d.galvin@epa.ie]
Sent: 23 February 2018 12:58
To: Planning - Plan Review
Subject: Re. Proposed Material Alterations to the Bray Municipal District Local Area Plan 2018-24
Attachments: SCP161003.2 EPA Submission Bray MD LAP-Cover.pdf; SCP 161003 Prop. Mat. Alts to Bray MD LAP 2018-24.pdf

Administrative Officer
Planning Section
County Buildings
Wicklow County Council
Station Road
Wicklow Town

23rd February 2018

Our Ref: SCP161003

Re. Proposed Material Alterations to the Bray Municipal District Local Area Plan 2018-24

Dear Mr Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 08/02/2018, regarding the above and notes its contents.

SEA Determination

We note your position with regard to the need for Strategic Environmental Assessment (SEA) of the Proposed Material Alterations to the Bray Municipal District Local Area Plan (The Alterations).

Specific Comments on the Proposed Material Alterations

We refer you to our previous submission on the Bray Municipal District Local Area Plan SEA/ER, dated 8th September 2017, which is attached and which should also be taken into account as relevant and appropriate to the Alterations.

We note that two of the Alterations (No's 1 & 18) have the potential for likely significant effects. We also note the commitment that site specific environmental assessments will be carried out in respect of Proposed Alterations No's 1 and 18, as required, to ameliorate the potential for significant environmental effects.

In relation to the proposed change in zoning associated with Alteration No. 18, *Table 3 Strategic Environmental Assessment of the Proposed Material Alterations* describes how this Proposed Alteration is 'contrary to the conservation and protection objectives of the Kilruddery Demense Conservation and Tourism Zone'. In this context, there is merit in considering the preparation of an environmental management plan for the future potential development of this area. The Plan/SEA should describe what measures will be implemented to mitigate for the potential for significant environmental associated with any future development at Kilruddery.

Any proposed amendments to land use zoning should be mindful to ensure consistency with the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/OPW, 2009)

Future Modifications to the Proposed Alterations

Where changes to the Alterations are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria as set out in *SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004)*.

SEA Statement – “Information on the Decision”

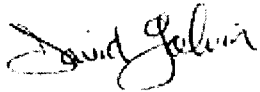
Following adoption of the Alterations, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Alterations;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Alterations;
- The reasons for choosing the Alterations adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Alterations.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would also be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely,



David Galvin
Scientific Officer
SEA Section
Office of Evidence & Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

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LoCall: 1890 33 55 99

Administrative Officer
Planning Section
County Buildings
Wicklow County Council
Station Road
Wicklow Town

23rd February 2018

Our Ref: SCP161003

Re. Proposed Material Alterations to the Bray Municipal District Local Area Plan 2018-24

Dear Mr Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 08/02/2018, regarding the above and notes its contents.

SEA Determination

We note your position with regard to the need for Strategic Environmental Assessment (SEA) of the Proposed Material Alterations to the Bray Municipal District Local Area Plan (The Alterations).

Specific Comments on the Proposed Material Alterations

We refer you to our previous submission on the Bray Municipal District Local Area Plan SEA/ER, dated 8th September 2017, which is attached and which should also be taken into account as relevant and appropriate to the Alterations.

We note that two of the Alterations (No's 1 & 18) have the potential for likely significant effects. We also note the commitment that site specific environmental assessments will be carried out in respect of Proposed Alterations No's 1 and 18, as required, to ameliorate the potential for significant environmental effects.

In relation to the proposed change in zoning associated with Alteration No. 18, *Table 3 Strategic Environmental Assessment of the Proposed Material Alterations* describes how this Proposed Alteration is 'contrary to the conservation and protection objectives of the Kilruddery Demense Conservation and Tourism Zone'. In this context, there is merit in considering the preparation of an environmental management plan for the future potential development of this area. The Plan/SEA should describe what measures will be implemented to mitigate for the potential for significant environmental associated with any future development at Kilruddery.



Any proposed amendments to land use zoning should be mindful to ensure consistency with the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/OPW, 2009)

Future Modifications to the Proposed Alterations

Where changes to the Alterations are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria as set out in *SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004)*.

SEA Statement – “Information on the Decision”

Following adoption of the Alterations, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Alterations;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Alterations;
- The reasons for choosing the Alterations adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Alterations.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would also be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'David Galvin', is positioned below the text 'Yours sincerely,'.

David Galvin
Scientific Officer
SEA Section
Office of Evidence & Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork



Environmental Protection Agency
An Ghníomhaireacht um Choimhínú Comhshaoil

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Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

8th September 2017

Our Ref: SCP161003.2

Re. Draft Bray Municipal District Local Area Plan 2017 and Strategic Environmental Assessment Environmental Report

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 1st August 2017, regarding the above. Please find attached the EPA's submission in relation to the Draft Bray Municipal District Local Area Plan (the Plan) and SEA Environmental Report (the SEA ER).

This submission is intended to promote full and transparent integration of environmental considerations in the Plan and the integration of the Plan-making and SEA processes.

Specific Comments on the Plan

We note that the Plan includes many objectives for protecting environmental sensitivities within the Plan area. It is also evident that the issues identified in the SEA have been incorporated into the Plan, which is acknowledged.

Action Areas

There is merit in considering the preparation of environmental management plan(s) for these 'Action Plan' areas. These environmental management plans could coordinate the development of the action areas, and consider aspects such as traffic management, waste management, green infrastructure integration/protection/provision, surface water management/drainage, noise etc.

Flooding

We note that some additional zoned lands proposed for development, have been identified as being within flood risk zones A and B. The Plan should ensure that the development and land use associated with these lands is appropriate to any flood risk identified, taking into account the *Planning System and Flood Risk Management Guidelines* (DEHLG/OPW, 2009).

Infrastructure

We note the proposed road objectives described in *Table 8.1.5 Road Objectives* and associated *Map T01*. We also note the proposed additional development/ infrastructure projects relating to industrial and retail development, critical service infrastructure provision, industrial and commercial development etc. In considering the development of these projects, the Plan should ensure that the requirements of the EIA, Habitats, Floods and Water Framework Directives are taken into account, where relevant. This will ensure that environmentally sensitive areas which may be affected by any proposed development are protected, and appropriate mitigation measures put in place. The potential for cumulative effects should also be taken into consideration in implementing the Plan.



The potential impacts of climate change should also be considered and appropriate climate mitigation and adaptation measures should be incorporated into the Plan.

Relationship with Key Plans/Programmes

The Plan should acknowledge that the National Mitigation Plan has been published, and that the Regional Spatial and Economic Strategies and National Planning Framework are currently being prepared, and will need to be integrated into the Plan, as appropriate, upon completion.

Additionally, the Draft River Basin Management Plan for Ireland (DHPCLG, 2017), once finalised and adopted, should also be integrated in the context of ensuring the protection and improvement of water quality status within the Plan area.

Green Infrastructure

We acknowledge the inclusion of specific biodiversity objectives in *9.2 Biodiversity*. The Plan could also consider describing how the *Conservation Area Appraisal* and *Green Infrastructure Audit* carried out, have been integrated into the Plan and SEA.

Specific Comments on the SEA ER

Critical Service Infrastructure

We note that three drinking water supply facilities within the Plan area at Bray 1, Kilmacanogue and Enniskerry are identified as being on the EPA's Remedial Action List for Q1 2017. The development of the Plan area should be closely linked to the ability to service such development with adequate and appropriate critical service infrastructure, including drinking water.

Historic Landfill Sites.

Several historic landfills have been identified within the Plan area at Fassroe, which should be taken into account in implementing the Plan. These sites should be considered in the context of the SEA process. The Plan should include commitments requiring that the *EPA Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (April 2007)* be taken into consideration and any potential future proposals to re-zone/develop these lands or adjacent lands should be '*most appropriate to the potential sensitivities*'. Where landfills meet the definition of a '*closed landfill*' as defined in the *Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (S.I. No 524 of 2008)*, there is merit in including a reference to the requirement for authorisation of the landfill by the Agency under those regulations.

Mitigation

We note the mitigation measures described in *Table 8.1 – Mitigation Measures*, to address the potential adverse effects identified in the SEA ER. We also acknowledge the relevant objectives of both the Wicklow County Development Plan and the Draft Bray MDLAP which provide for the necessary mitigation measures.

Monitoring

In *Section 8.2*, the monitoring programme could include further information on the likely significant effect to be monitored and the frequency over which this monitoring will take place. Where it is intended to align the monitoring of this Plan with the monitoring programme for the Wicklow County Development Plan, the SEA ER should consider including this information also for clarity.

Future Amendments to the Draft Plan

Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the "environmental assessment" of the Draft Plan.



SEA Statement – “Information on the Decision”

Following adoption of the Plan, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely

A handwritten signature in black ink that reads "David Galvin".

David Galvin
Scientific Officer
SEA Section
Office of Evidence and Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

Leonora Earls

From: McCormack Michael [Michael.McCormack@tii.ie]
Sent: 07 March 2018 16:01
To: Planning - Plan Review
Subject: Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 - 2024
Attachments: Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan 2018 - 2024.pdf

Dear Sir/Madam,

Please find attached a copy of the Authority's observations on the Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 - 2024

A hard copy has also issued by post.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

BRAY LAP
Administrative Officer
Planning Department
Wicklow County Council
Station Road
Wicklow

Dáta | Date
7 March, 2018

Ár dTag | Our Ref.
TII18-100718

Bhur dTag | Your Ref.

Re: Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 - 2024

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes referral of consultation relating to the Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 – 2024.

TII notes that no proposed material alterations are proposed to the Draft Local Area Plan arising from consideration of the Authority's initial submission to the Council of 13 September, 2017. Having reviewed the Chief Executives Report in that regard, TII wishes to advise that the observations made in our submission of 13 September, 2017, remain the position of the Authority.

In relation to other proposed amendments on display, TII outlines the following observations for the Councils consideration;

Proposed Material Alteration No. 1

TII notes proposals to amalgamate the settlement boundaries for Kilmacanogue and Kilmurray including additional infill 'Tertiary Development Area' proposed in material alteration no. 1 and consequential mapping amendments.

In the initial submission on the Draft Plan, TII requested an amendment of Objective RO2, and associated mapping, including Kilmacanogue, to include the specific proposals outlined in Table 5.7 of the M11/N11 Corridor Study. It does not appear that the Council has included such proposals on the Local Area Plan mapping relevant to Kilmacanogue and it is requested, in the interests of clarity, that the mapping would be amended to include the roads/transport proposals included in the M11/N11 Corridor Study.

In relation to proposals to include additional 'Tertiary Development Area' at this location and to amalgamate the settlement boundaries for Kilmacanogue and Kilmurray, TII acknowledges that the lands concerned access the local road network. Notwithstanding this, existing access is facilitated to the N11, national primary road, via left-in, left-out arrangements. The Council will be aware that the M11/N11 is of strategic importance nationally and this is reflected in its inclusion within the EU TEN-T comprehensive network. Therefore, there is a requirement to confirm that the additional development planned in the area can be accommodated without compromising the safety and efficiency of the adjoining strategic national road network. The M11/N11 Corridor Study identifies that to bring this section of the N11 between Junction 8 and 14 up to the required standard existing direct accesses and left on/left off junctions should be closed or reconfigured.

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Proposed Material Alteration No. 2

Amendment to Section 2.2.3 of the Draft Plan incorporates a new subsection titled 'Population and Housing Growth Targets'. Within this subsection, the proposed material alteration outlines that accurately predicting population growth is difficult as growth will be reliant, in relation to Bray, on the cooperation and financing of TII.

In the interests of clarity, TII advises that the M11/N11 Corridor Study referred to above and in detail in the Authority's initial submission on the Draft Plan outlines improvement works, consistent with those included in the NTA Transport Strategy, for the M11/N11 Corridor and elaborates further on off-network, i.e. complementary local transport measures required to facilitate the on-going strategic function of the M11/N11 national road corridor. The purpose of the improvements identified is not to accommodate population growth in Wicklow, this is a matter for the Council and infrastructure improvements required to facilitate such growth are also a matter for the Council. Future public transport provision is a matter for the NTA. TII would welcome clarification of this in the Local Area Plan prior to adoption in the interests of clarity.

Proposed Material Alteration No. 11

TII acknowledges the commitment in proposed revisions to Objective PT2 to support and facilitate the implementation of measures identified in the Bray and Environs Local Transport Study, currently being undertaken by the NTA, Wicklow County Council and TII.

As outlined in TII's initial submission of the Draft Plan, it is considered essential that the Local Area Plan is fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study in relation to location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals prior to the adoption of the plan. This remains the position of TII. The Councils commitment to supporting and facilitating the implementation of measures identified in the Study, outlined in Proposed Material Alteration No. 30 is acknowledged.

Proposed Material Alteration No. 16

In relation to phasing proposals included in the proposed material alteration, TII recommends review of proposals in the context of the NTA's Bray and Environs Local Transport Study which is currently being undertaken. TII also notes the associated amendment to Table 3.1 which indicates additional housing provision for Fassaroe. TII considers that the location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals should be fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study.

Proposed Material Alteration No. 30

TII welcomes reference to the M11/N11 Corridor Study and the Councils commitment to supporting and implementing measures to improve the M/N11 and associated junctions that emerge from the Study. The Council will note that the measures identified in the Study are consistent with proposals included in the NTA's Transport Strategy for the Greater Dublin Area, 2016 – 2035.

In terms of project status, the national road elements of the Study will be subject to pre-appraisal in accordance with the provisions of Project Ireland 2040; National Development Plan, 2018 – 2027. There is currently no funding commitment for the delivery/implementation of the national road measures identified. The off-network complementary local transport measures are considered a matter for the Council to address. Infrastructure improvements required to facilitate growth are a matter for the Council and/or developers.

In relation to phasing proposals for Fassaroe included in Section 5 of Proposed Material Alteration No. 30, TII remains of the opinion that zoning and phasing proposals such as that outlined should be fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study in relation to location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals.

Conclusion

As acknowledged at the outset of this submission, TII notes that no material alterations are proposed to the Draft Local Area Plan arising from consideration of the Authority's initial submission to the Council of 13 September, 2017. Having reviewed the Chief Executives Report in that regard, TII wishes to advise that the observations made in our submission of 13 September, 2017, remain the position of the Authority.

TII remains of the opinion that it is essential that zoning and phasing proposals for the development of lands included in the Bray Municipal District Local Area Plan, particularly the extensive development planned for Fassaroe, should be fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study being prepared by the NTA with the Council and TII in relation to location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals.

TII welcomes the commitment included in Proposed Material Alteration No. 30 to supporting and facilitating the implementation of measures identified in the Bray & Environs Local Transport Study and acknowledges that the Council indicate a commitment to updating/amending the LAP if found necessary to address measures identified in the Study when completed. TII considers that this is a critical requirement to be addressed.

It is requested that the foregoing comments and observations are considered and addressed by the Council prior to the adoption of the Local Area Plan.

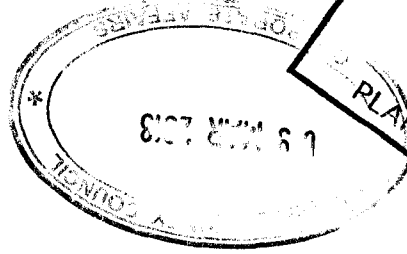
TII as always remains available to assist and support the NTA and Wicklow County Council in developing a sustainable land use and transport based planning framework for the Bray and Environs area of the county as part of the Bray Municipal District Local Area Plan.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

BRAY LAP
Administrative Officer
Planning Department
Wicklow County Council
Station Road
Wicklow



Dáta | Date
7 March, 2018

Ár dTag | Our Ref.
TII18-100718

Bhur dTag | Your Ref.

Re: Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 - 2024

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes referral of consultation relating to the Proposed Material Alterations to the Draft Bray Municipal District Local Area Plan, 2018 – 2024.

TII notes that no proposed material alterations are proposed to the Draft Local Area Plan arising from consideration of the Authority's initial submission to the Council of 13 September, 2017. Having reviewed the Chief Executives Report in that regard, TII wishes to advise that the observations made in our submission of 13 September, 2017, remain the position of the Authority.

In relation to other proposed amendments on display, TII outlines the following observations for the Councils consideration;

Proposed Material Alteration No. 1

TII notes proposals to amalgamate the settlement boundaries for Kilmacanogue and Kilmurray including additional infill 'Tertiary Development Area' proposed in material alteration no. 1 and consequential mapping amendments.

In the initial submission on the Draft Plan, TII requested an amendment of Objective RO2, and associated mapping, including Kilmacanogue, to include the specific proposals outlined in Table 5.7 of the M11/N11 Corridor Study. It does not appear that the Council has included such proposals on the Local Area Plan mapping relevant to Kilmacanogue and it is requested, in the interests of clarity, that the mapping would be amended to include the roads/transport proposals included in the M11/N11 Corridor Study.

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In the interests of clarity, TII advises that the M11/N11 Corridor Study referred to above and in detail in the Authority's initial submission on the Draft Plan outlines improvement works, consistent with those included in the NTA Transport Strategy, for the M11/N11 Corridor and elaborates further on off-network, i.e. complementary local transport measures required to facilitate the on-going strategic function of the M11/N11 national road corridor. The purpose of the improvements identified is not to accommodate population growth in Wicklow, this is a matter for the Council and infrastructure improvements required to facilitate such growth are also a matter for the Council. Future public transport provision is a matter for the NTA. TII would welcome clarification of this in the Local Area Plan prior to adoption in the interests of clarity.

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TII acknowledges the commitment in proposed revisions to Objective PT2 to support and facilitate the implementation of measures identified in the Bray and Environs Local Transport Study, currently being undertaken by the NTA, Wicklow County Council and TII.

As outlined in TII's initial submission of the Draft Plan, it is considered essential that the Local Area Plan is fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study in relation to location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals prior to the adoption of the plan. This remains the position of TII. The Councils commitment to supporting and facilitating the implementation of measures identified in the Study, outlined in Proposed Material Alteration No. 30 is acknowledged.

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In relation to phasing proposals included in the proposed material alteration, TII recommends review of proposals in the context of the NTA's Bray and Environs Local Transport Study which is currently being undertaken. TII also notes the associated amendment to Table 3.1 which indicates additional housing provision for Fassaroe. TII considers that the location, and quantum of lands zoned for development, necessary improvements and interventions and phasing proposals should be fully informed and, if necessary, amended to reflect the Bray and Environs Local Transport Study.

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TII as always remains available to assist and support the NTA and Wicklow County Council in developing a sustainable land use and transport based planning framework for the Bray and Environs area of the county as part of the Bray Municipal District Local Area Plan.

Yours sincerely,



Michael McCormack
Senior Land Use Planner