



Pre Draft Bray LAP Submission - Report

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| Who are you: | Private Individual |
| Name: | Dunmoy Properties Limited |
| Reference: | BRAYLAP-185744 |
| Submission Made | December 18, 2024 6:58 PM |

File

Dunmoy - Bray LAP Presentation.pdf, 5.34MB

BrayMunicipalDistrictLocalAreaPlan-ArchitecturalHeritage.pdf, 0.86MB

Bray Municipal District Local Area Plan 2025

Pre-Draft Consultation

I refer to the above and, in particular to the mapping of protected structures at Mill Lane, Bray.

The record of protected structures that is included in the current Bray Municipal District Local Area Plan includes The Maltings in Mill Lane under reference B56, with the description “structure”. No other buildings or other structures in Mill Lane are included in the record of protected structures. This listing is vague and needs to be clarified, particularly in the light of the mapping.

The mapping that accompanies the plan shows an extensive area coloured to denote the protected structure, though this spans three distinct and separate properties:



Figure 1: Map showing purported protected structures in the vicinity of Mill Lane

The nature and extent of the protected structure described as The Maltings and listed under reference B56 needs to be clarified and this report seeks to provide this clarification.

The three long sections of the area coloured magenta in the centre of the above image represent The Maltings to the north, Riverside Works in the centre and O’Rahilly Hall to the south. These are separate structures in separate ownership and have not formed part of the same ownership in many years, if ever.

Mapping error

Valuation records

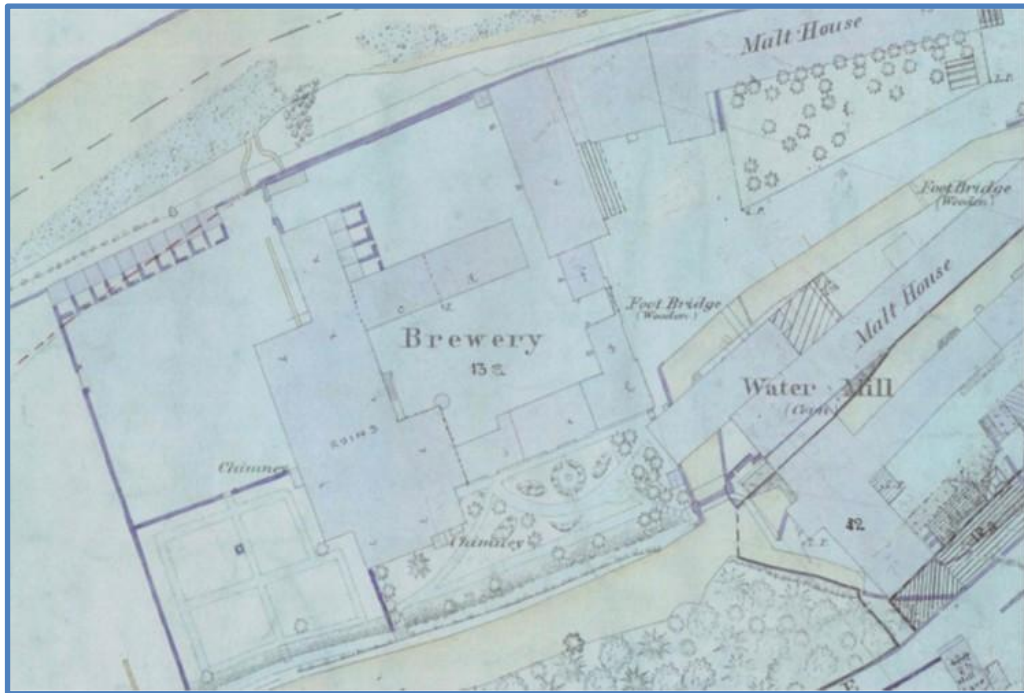


Figure 2: Detail of nineteenth-century valuation map

The records of the Valuation Office provide the most accessible and accurate information as to the extent of properties over time. An alternative is the Land Registry, though that repository does not provide cover for every plot of ground in the country, unlike the very comprehensive coverage available through the valuation records.

The map extract above is from the Valuation Office and shows the plots in Mill Lane with red lines denoting the property boundaries. The premises now known as the Riverside Works is labelled with the reference number "12", with "12a" adjacent on the southern side, while the premises now known as The Maltings is labelled Malt House and is part of the larger brewery site with the reference number "13". The photographs below show entries from the valuation records that indicate the occupancy and use of each of those plots. Plot 12 is at the bottom of one page in the records, with plots 12a and 13 following at the top of the next page.

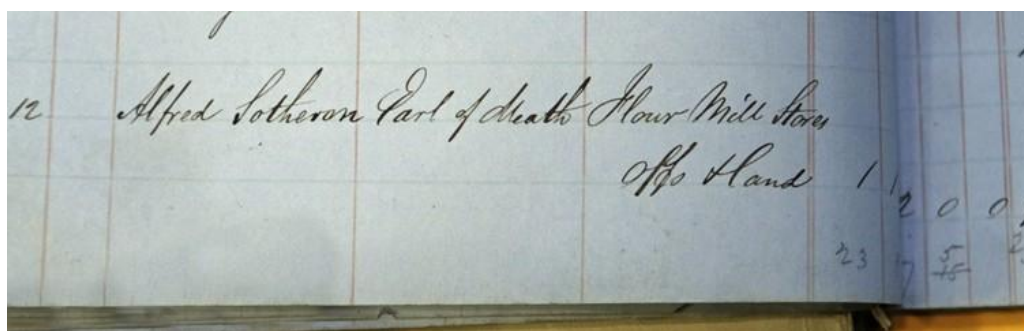


Figure 3: The valuation record entry for plot 12 in the 1860s

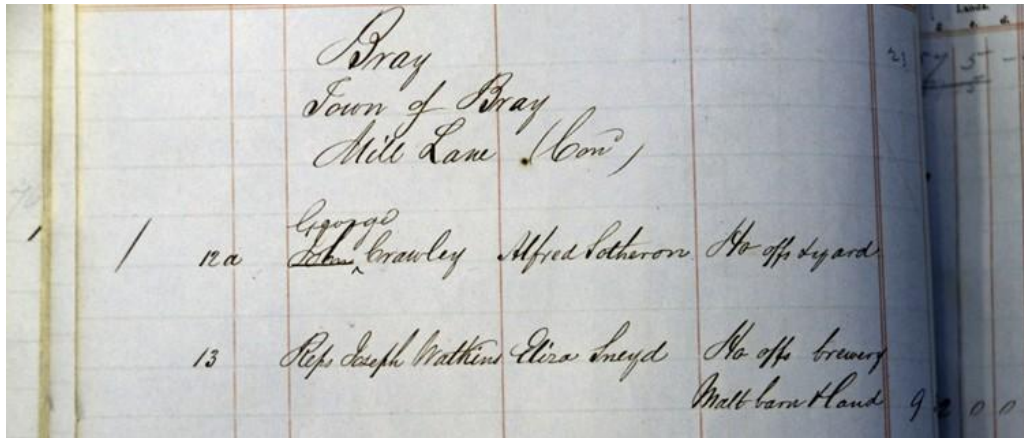


Figure 4: The valuation record entry for plots 12a and 13 in the 1860s

The brewery closed down in about 1870, while the maltings continued in use. This resulted in a split in plot 13 in the valuation records, though plots 12 and 12a were unaffected.

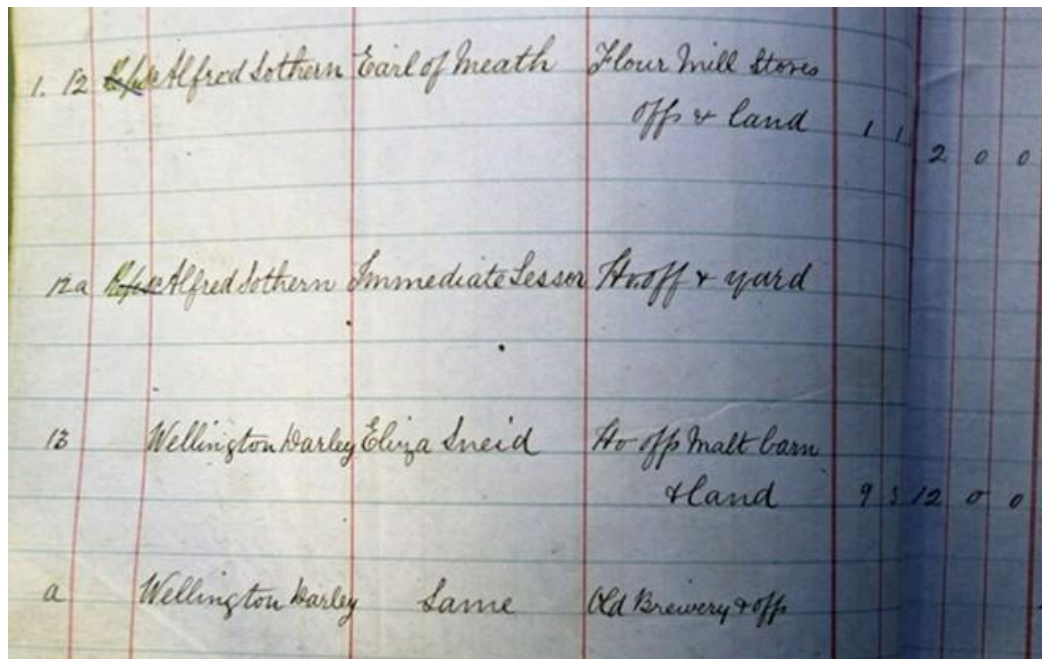


Figure 5: The valuation record entries for plots 12, 12a, 13 and 13a in the 1870s

In the 1890s the flour mill at Mill Lane closed down and the milling machinery was sold off. The property was acquired by the Electric Light Company with a view to using the water power that had formerly operated the mill to provide the power to generate electricity to facilitate the changeover of street lighting in Bray from gas lighting to electric lighting. The mill was then acquired by Bray Urban District Council.

This change is reflected in the valuation records as seen in the view overleaf. It is noted that the numbering of properties in Mill Lane for valuation purposes changed at this time and the former mill and the adjacent house now became plots 2 and 2a, while the maltings and disused brewery became plots 3 and 3a.

| | | | |
|----|---|---|--|
| 2 | Arthur W. Mosse Bray Urban Council Bray Town Council Bray & Ennisberry Railway Company Hibernian Bank Ltd | Earl of Meath Bray Urban Council Bray Town Council Bray & Ennisberry Railway Company Hibernian Bank Ltd | Flour Mill Stores, off. yard (Electric Light Station) Offices yard Ho. off. & y? Land |
| 2a | J. P. Byrne & Son a Lodgers Bray & Ennisberry Railway Company | Arthur W. Mosse Bray Urban Council Bray Town Council Bray & Ennisberry Railway Company Immediate lessor | |
| 3 | Wellington Darley Edward R. Read a Wellington Darley Edward R. Read | Eliza Smeid " | Ho. off. Gatehouse Malt Ho. Malt Barn & Land |

Figure 6: The valuation record entry for plots 2, 2a, 3 and 3a in the 1890s

In the 1920s the valuation plots were renumbered again, the former flour mill that is now the Riverside Works becoming plot 1, the site of the adjacent house was changed from plot 2a to plot 2, while the Maltings became plot 4. The Electricity Supply Board acquired the electricity generating station from Bray UDC, while the maltings continued in use as maltings. This situation is reflected in the valuation records in the 1920s as seen in the extract below.

| | | | |
|----|---|---|--|
| 1 | Electricity Supply Board Bray Urban Council Bray Town Council | Electricity Supply Board Bray Urban Council Bray Town Council | Electricity Hall Gatehouse Generating Station Offices yard Ho. off. & y? Land |
| 2 | Electricity Supply Board Bray Urban Council Bray Town Council | Electricity Supply Board Bray Urban Council Bray Town Council | Offices yard |
| 3 | Michael White | Electricity Supply Board | Ho. & m. yard |
| 4a | Watkins Jameson Linn & Co. Ltd | Eliza Smeid | Gate house Gate Lodge off. Malt Malt Barn Boilers Land |

Figure 7: The valuation record entries for plots 1 to 4 in the 1920s

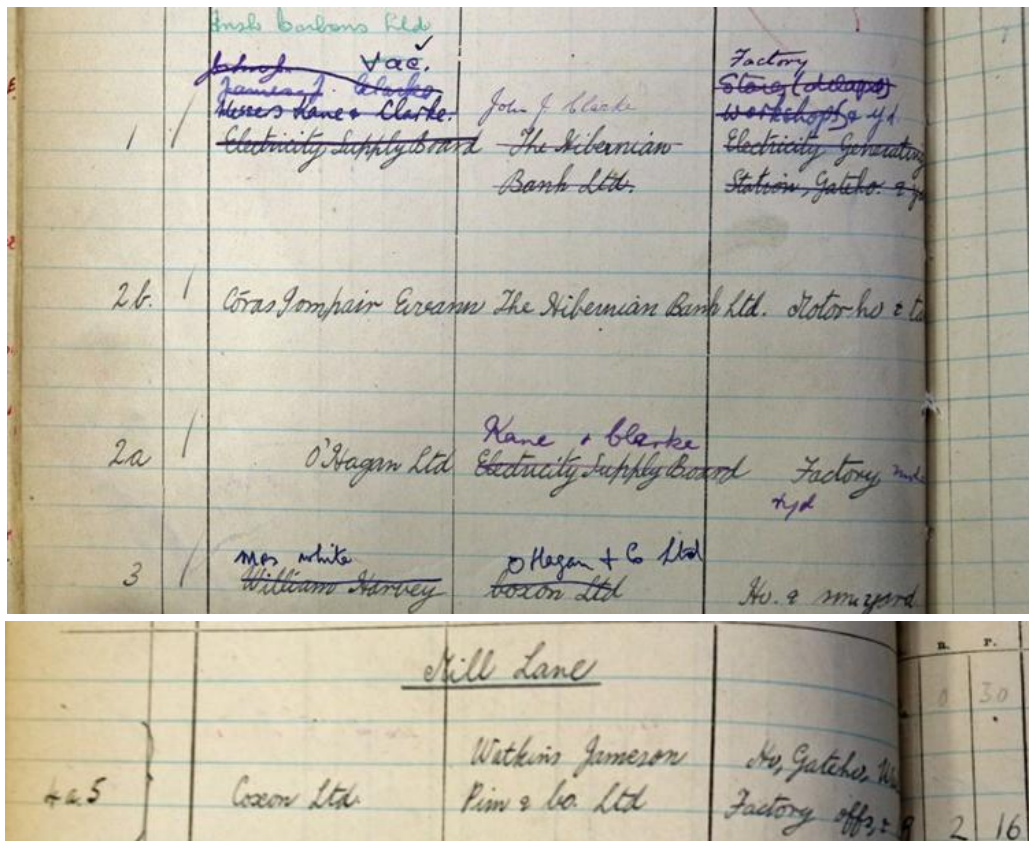


Figure 8: The valuation record entries for plots 1 to 5 in the 1950s

Later in the twentieth century the electricity generating station closed and the building was used for storage before becoming a factory, still under plot number 1. Plot 2a was disposed of by the ESB and became a factory. The maltings continued to be owned by the former brewery company Watkins, Jameson, Pim & Co Ltd and was leased for use as a factory, having ceased use as a maltings in about 1940.



Figure 9: Current Valuation Office map showing plot boundaries

The current map held by the Valuation Office, reproduced above, shows the plot boundaries, with the dark line dividing plot 1, which is the Riverside Works, from plot 4, which is the Maltings, very clearly distinguishing the extent of these ownerships. Similarly, there is a dark line between plot 1 and plot 2a, which is O'Rahilly Hall, the former bag manufacturing business.

Discussion

The text above describes the uses of the different plots in Mill Lane over more than one hundred and sixty years and demonstrates that within that period at no time has the property known as The Maltings, which is now in residential use, been in the same ownership or the same use as the Riverside Works, which is the former flour mill and later electricity generation station. In the earlier years plot 2a was the site of the home of the owner of the flour mill, though the ownership of these two plots has been separated for many years.

The differences in ownership and the clear and consistent boundary lines have significant implications for whether the Riverside Works is included within the protection under reference B56 in the record of protected structures. Clearly, these two plots, while adjacent, have no relationship to each other and have not had since at least the middle of the nineteenth century and possibly for a long time before that.

This should be sufficient to determine that the Riverside Works is not a protected structure under the heading of The Maltings in reference B56.

Similarly, the valuation records show that while O'Rahilly Hall was formerly the site of the mill-owners house and subsequently the offices for the ESB when the electricity generating station was in use, that property was then developed to provide the present building which is in separate ownership from the Riverside Works and has absolutely no connection with The Maltings. It is clear that O'Rahilly Hall is not part of the protected structure at B56.

If, however, it is argued that Riverside Works was at some time in the past part of the same property as the Maltings, for which, it should be added, there is no evidence, there is case law that would rule out this position as a basis for Riverside Works being included in the protection of The Maltings. On 15th May 2023 Mr Justice Humphreys made a judgement in the case of North Great George's Street Preservation Society and An Bord Pleanála and Hill Street Limited Partnership, judicial review reference 2020 562 JR. In this he stated, *inter alia*, that:

Whether property B falls within the curtilage of property A should be determined by reference to the legally relevant time for the purposes of the determination of the issue. This may vary from legal context to legal context. For determining the legal effect of an entry in the RPS, the "legally relevant time" is the date on which the structure on property A was first listed prior to the establishment of the RPS system or first included in the RPS, whichever was earlier, unless the wording of the RPS has changed in a relevant way in the meantime or has made express relevant provision to determine the curtilage.

As the wording in the record of protected structures does not provide for the inclusion of the Riverside Works or O'Rahilly Hall and as these buildings were clearly not part of the property at The Maltings at the time it was first protected this judgement makes it clear that the Riverside Works and O'Rahilly Hall cannot be held to be protected structures, or in the curtilage of a protected structure.

Conclusion re mapping error

Figure 1 above shows The Maltings, Riverside Works and O'Rahilly Hall coloured in magenta to denote that they are protected structures. However, there is no entry in the record of protected structures that could apply to Riverside Works or O'Rahilly Hall and hence the extent of this colouring is an error that needs to be corrected. It is normal practice in development plans that where there is a conflict between the written statement and the maps the written statement takes precedence, so it cannot be taken that the mapping is evidence that Riverside Works or O'Rahilly Hall are protected unless there is a corresponding entry relating to these properties in the record of protected structures.

Suitability for protection

While the above text demonstrates that the Riverside Works is not a protected structure, a separate question is whether this former flour mill should be added to the record of protected structures.



Figure 10: Riverside Works

The premises now known as Riverside Works includes the structure that was formerly a flour mill. While it is known that there was a mill in this general location from medieval times, the present building is on a different site and was not built until the late eighteenth or early nineteenth century. The map extract below in Figure 11 is based on a survey carried out in 1762 and shows the mill that was on the southern bank of the river to the west of Bray Bridge at that time. This mill is located further west than the present building, which is located in the area to the north of the parcel of land labelled "21" on the map.

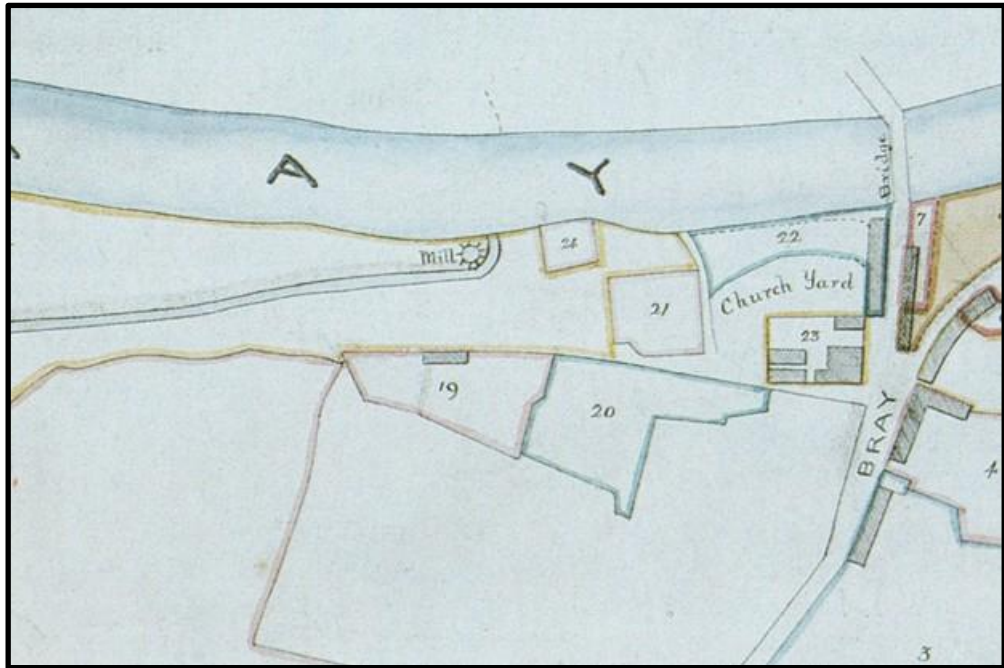


Figure 11: Extract from map of Bray based on a survey carried out in 1762 showing mill

In the twentieth century extensive alterations and additions were made to the former flour mill, firstly with the conversion to an electricity generating station and subsequently for use of the site for industrial purposes. A number of buildings to the east of the present structure have been demolished to reveal what remains of the flour mill. As may be seen from the photograph above, the original stone flour mill has been altered to a significant extent, with windows replaced and sections of the wall now faced with concrete.



Figure 12: Interior of building at ground-floor level

The interior of the building has been gutted in the past, with new walls and floors inserted. The photograph above shows a view towards the south inside the building.



Figure 13: Interior of the building at first-floor level

Figure 13 above shows the view to the north at first-floor level. The structure at left in Figure 12 and to the right in Figure 13 are of concrete. More significantly, the two photographs show concrete columns supporting the floors above. The original floors have been removed and replaced at different levels by concrete floors supported on concrete columns. The resultant floor to ceiling heights are not suited to conversion for new uses, particularly as the window levels do not match the floor levels. It would not be possible to remove the concrete while retaining the walls to provide a new use for the building.

Very little character remains of the original flour mill with changes to the external appearance and to the interior that are not in keeping with its original form. The extent of concrete that has been introduced greatly devalues the historic character of the former mill.

In essence, the loss of character of the former mill reduces its suitability for addition to the record of protected structures, while the difficulties in adapting the building to a suitable future use render the building obsolete and not adaptable.

Rob Goodbody

December 2024



DUNMOY

PROPERTIES LIMITED

Bray Local Area Plan Submission 18th December 2024

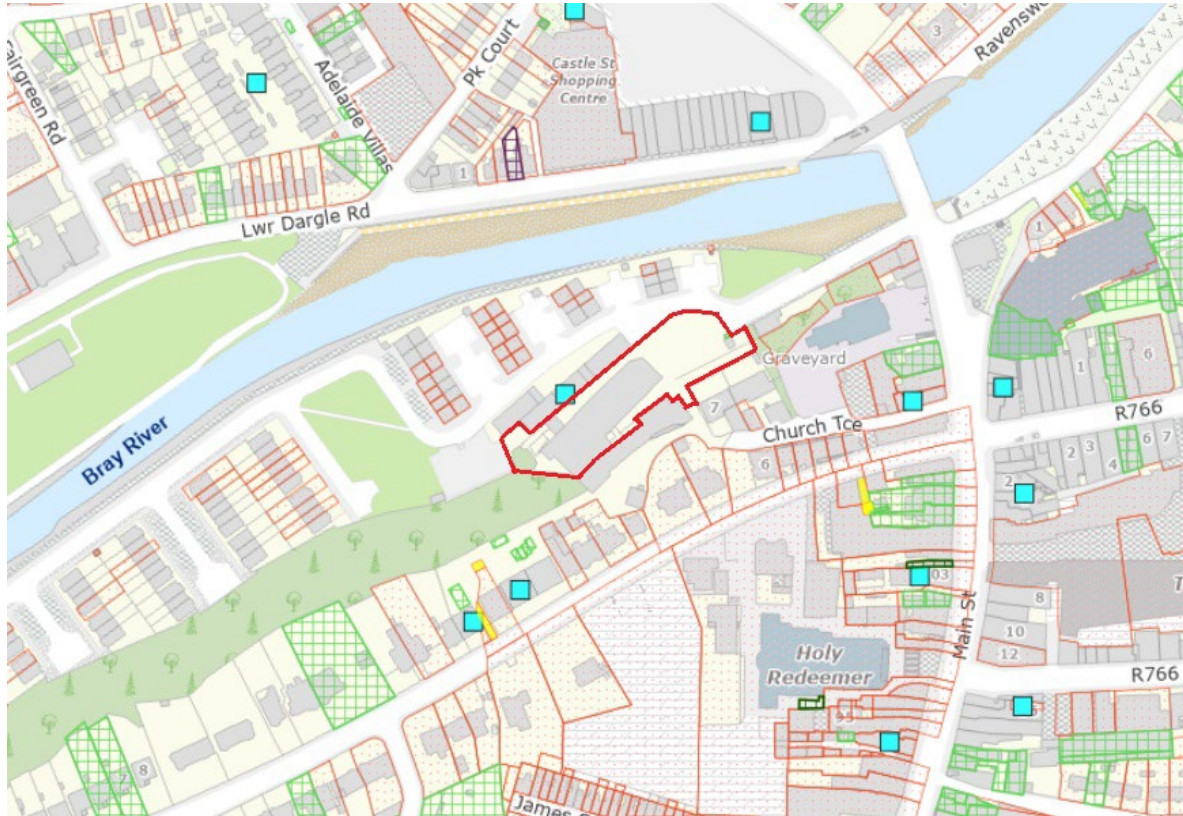
www.dunmoy.ie

Who we are and what we do

- Dunmoy Properties Limited (“Dunmoy”) is an Irish property company founded in 2018 and focused on residential and commercial development and property management.
- We have completed a number of housing developments and also manage and develop commercial properties.
- We have a number of sites in active development currently (Dec 2024) and are in the process of acquiring additional sites.
- We approach each site on its merits and accept and work with the site constraints to deliver optimal outcomes.



Riverside Works - Introduction



This town centre site in Bray – known as Riverside Works – was acquired by our affiliated entity Dungrey Limited in December 2019. The buildings at Riverside Works are in very poor condition and most recently housed a plastic factory known as Bray Chemicals. Since this business closed in the 1990's the property has been largely derelict and used for ad hoc storage. Given the prior use as a power station (which likely gave it its name) and use for plastics production these lands may require some remediation in advance of development.

On the plus side and as indicated in the existing LAP - The site affords a unique opportunity for high quality construction in a location right in the centre of Bray and 100m from a high frequency bus route and 850m from Bray Dart Station.

Riverside Works is accessed from Mill Lane to the west of Bray Main Street. It is between an old factory building O'Rahilly Hall on Church Terrace and The Maltings old Mill which is a protected structure and is now a 4-storey mixed use office and residential building. It is a strategically located site conveniently situated alongside the Dargle River. This is a well-established residential and commercial area located in Bray town centre.

Local Area Plan 2018 – OP4

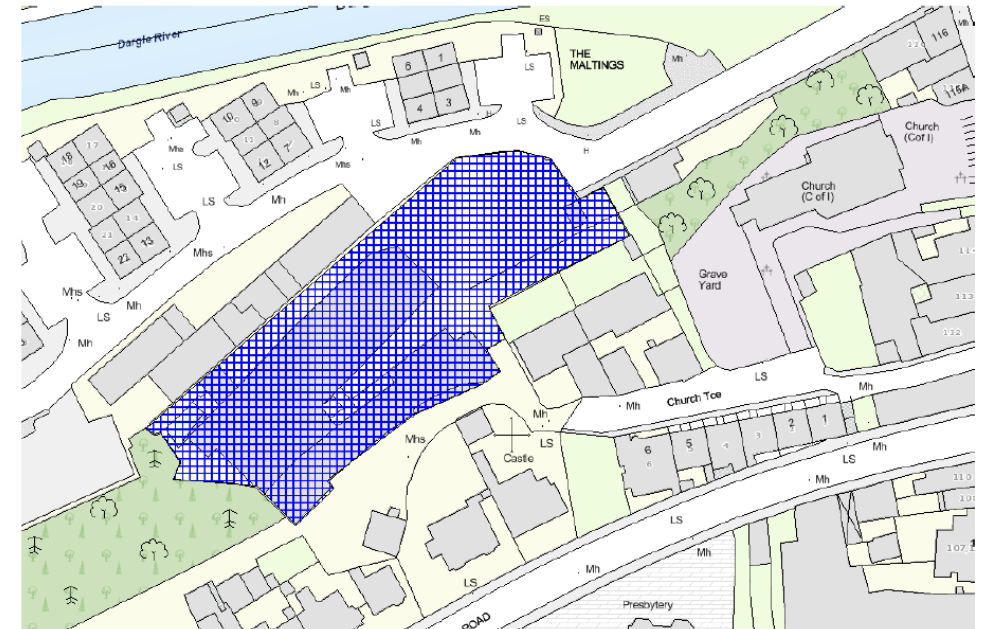
BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018

OP4 Former Chemical Plant and The Maltings

Bray Municipal District Local Area Plan 2018

OP4 states:

These 'town centre' zoned lands measure c. 0.33ha and are accessed via The Maltings on the north side and Church Terrace at the upper, south side. There are a number of buildings on the site, particularly O'Rahilly Hall, the former 'Beverly handbags' factory on Church Terrace, in active commercial use and a number of (at least partially) vacant warehouse type buildings on 'The Maltings' side. While there *may be buildings worthy of retention of the site*, there is **certainly scope for demolition of some structures** and for the development of a **new, high intensity mixed commercial and residential development**.



Objectives OP4

1. To support the redevelopment of the lands for a mix of uses, including commercial, residential, community and cultural uses; retail use will only be considered acceptable where it would add and not detract from the vitality and viability of the core retail area along Main Street; in the event that redevelopment comprising residential use only is brought forward, there would be no requirement to accompany same with commercial / retail development;
2. A high density development, that makes the best use of this serviced urban land will be expected.

Heritage & RPS List

Record of Protected Structures in Bray

| Town Plan Ref. No | Building Location | Street / number | Designation |
|-------------------|-------------------|-----------------|-------------|
| B56 | Mill Lane | The Maltings | Structure |



2018 LAP RPS Map

Schedule 10.14 (b) Protected Views and Prospects

| Bray Ref | |
|----------|--|
| 12 | The view from the Harbour Bridge of the Maltings and the former power station chimney. |



2018 LAP Protected View Map

Since the 1999 Bray Town Plan, “The **Maltings**” and the “view of the former power station Chimney” have been listed on the Record of Protected Structures and the Record of Protected Views and Prospects respectively.

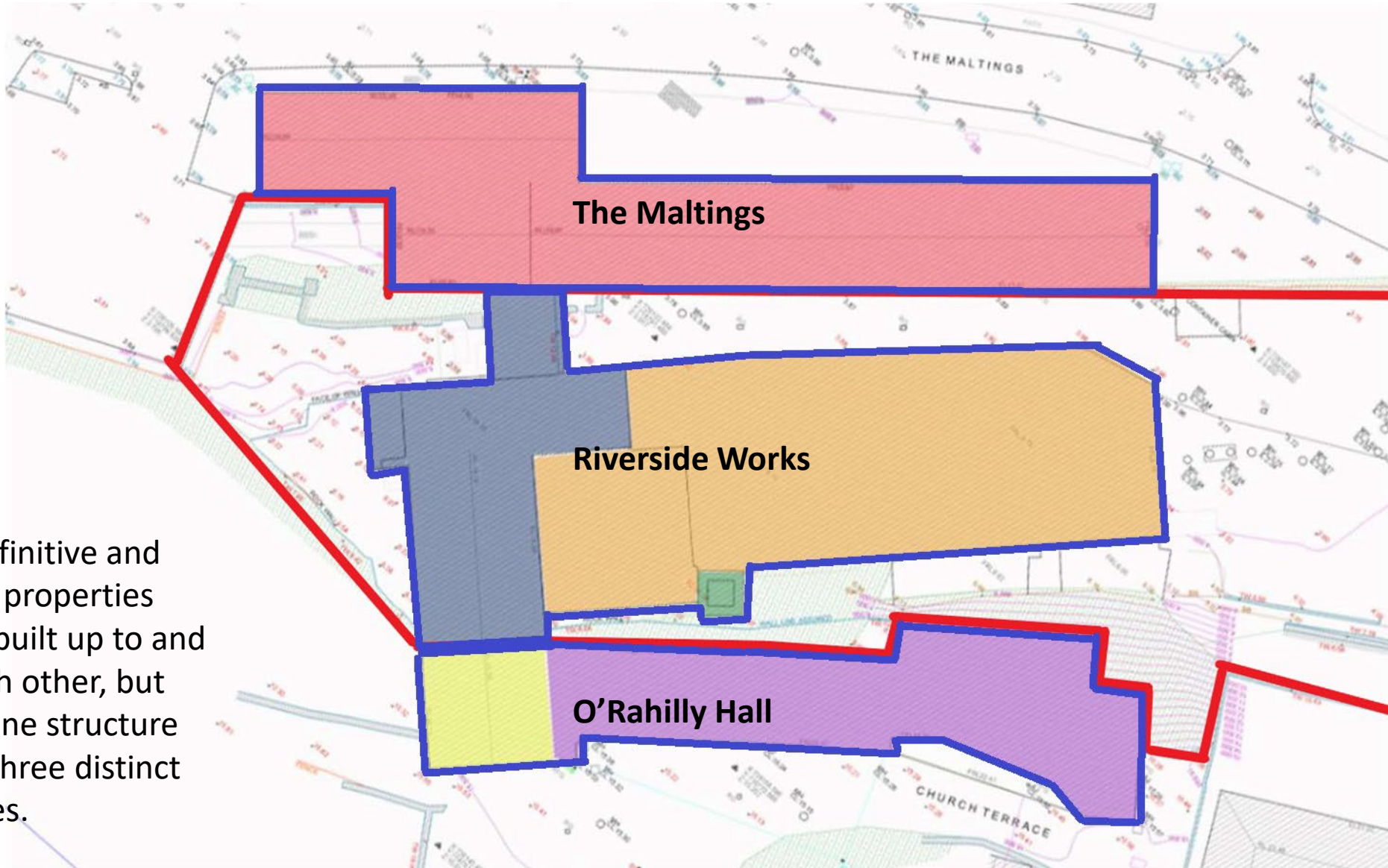
The Maltings first appeared on the RPS of the 2016-2022 County Development Plan.

There is no written detail regarding “the **Maltings**” and the specific structure(s) protected. The maps, however, highlight The Maltings, Riverside Works and O’Rahilly Hall. Indeed, the current LAP, at OP4, talks about The Maltings and Bray Chemicals as separate locations.

The View of the Chimney is not included in the County Development Plan at all, only in the LAP.

Assessment of RPS Listing

Subject Properties



Three definitive and separate properties that are built up to and abut each other, but are not one structure and are three distinct properties.

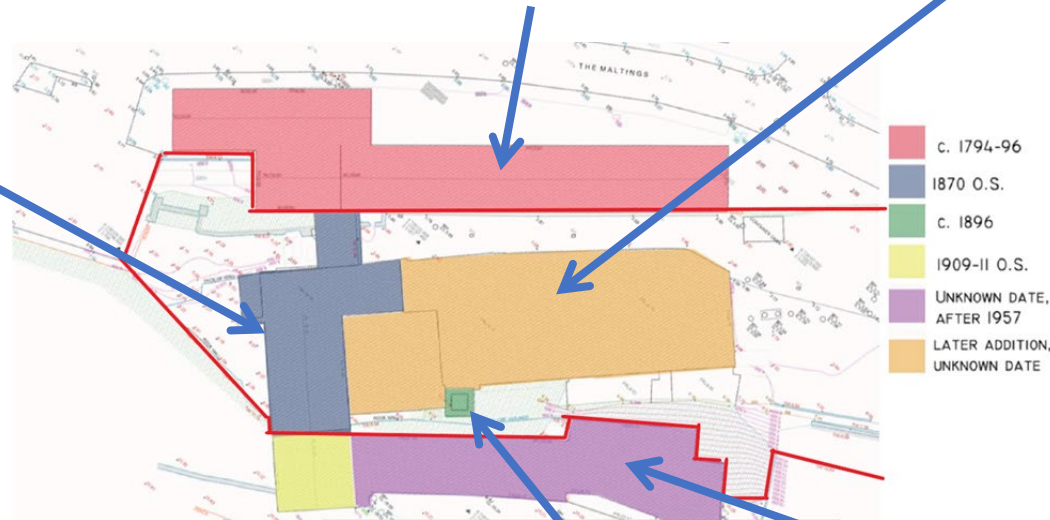
The 1870's section of the building is the only structure remaining on Riverside Works. It is derelict and has been for over 20 years.

The structure itself has been significantly altered over the last 150 years, so much so that it retains little to no architecture of historical significance. Please see attached report from Rob Goodbody, a highly experienced and nationally recognised Bray based Historic Building Consultant, who is a respected expert on the heritage of Bray and its environs.



Heritage

The **Maltings Mill** building neighbours, but does not form part of, the site.



Red-brick addition - added in the 1950's or early 1960's. This was removed, with WCC approval, in January 2023 in order to access the chimney for health and safety height reduction works.



Chimney built in 1896 and only used for a short period of time as a power station chimney. Works were undertaken in late 2022 - early 2023 to reduce the height of the chimney for health and safety reasons. The bricks removed have been stored for when we rebuild the chimney.

O'Rahilly Hall was constructed in the 1950's. This property neighbours, but does not form part of, the site, and is only accessible from Church Terrace, via Herbert Road. The property sits above Riverside Work, on a steep escarpment c. 9m above the ground level of Riverside Works. There is no heritage value to this property.

The Maltings v. Riverside Works

As early as the 1860's the Valuations Office Records show a distinction between ownership of The Maltings and Riverside Works. Riverside Works, is referenced as Plot 12 in the Valuation record entry for 1860, is in the Ownership of The Earl of Meath. The Property now known as The Maltings, is referenced as Plot 13 in the same Valuation Record Entry and is in the ownership of Eliza Sneyd. O'Rahilly Hall, Plot 12a, is in the ownership of Alfred Sotherton.

The attached report from Rob Goodbody, of Historic Building Consultants, provides in much further detail the transactions of the two distinct properties from 1860's to the 1950's, confirming that there has been no unity of ownership since before 1860.



12 Alfred Sotherton Earl of Meath Flour Mill Store
Opps Hand 1 12 0 0
23 17 5 2

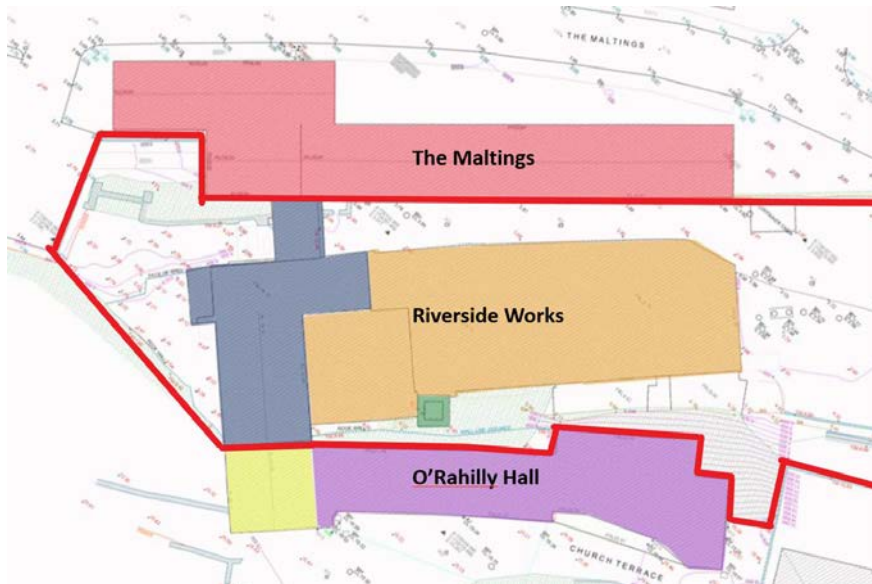
Bray
Town of Bray
Mill Lane (Hon)
12a George Crawley Alfred Sotherton No opps regard
13 Rep Joseph Watkins Eliza Sneyd No opps brewing
Malt barn Hand 9 0 0 0

The Maltings v. Riverside Works

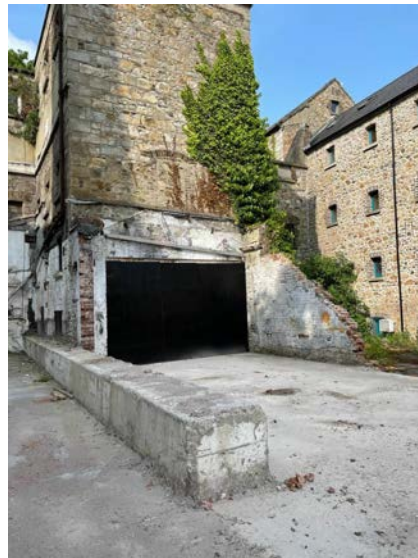
The report from Rob Goodbody, as attached, asserts that the reference to "The Maltings" in the Record of Protected Structures pertains solely to the structure known as The Maltings, and not to the identified structures within Riverside Works and O'Rahilly Hall. Furthermore, as commented by Mr Goodbody, there is minimal heritage value in the remaining structures at Riverside Works.

We do, however, acknowledge and respect the heritage of the remaining structures at Riverside works and while they cannot be re-tasked for redevelopment, despite our attempts to do so (which we can share with WCC if you so wish – floor plates don't match to window openings and retaining the walls is unsafe and not commercially viable to build behind), we have, as a result of exhausting these retention options, conducted a full stone survey and will reuse the stones from the existing walls in the new development we are proposing.

In light of these facts, we respectfully recommend that the RPS maps be updated to correct the map that the Maltings is solely The Maltings and does not include Riverside Works or O'Rahilly Hall.



Remaining Structures on site - External



Further history:

- ❖ 1860s – 1890's Riverside Works was a Flour Mill
- ❖ 1890's Riverside Works was purchased by the Electric Light Company to operate as a power station generating electricity, and facilitating the change from Gas to Electric street lighting throughout Bray. It was then acquired by Bray Urban District Council.
- ❖ 1920's – The ESB acquired the power station / Riverside Works from BUDC.
- ❖ c.1950's – ESB sold Riverside Works and it became a factory.

As can be seen in the attached report from Rob Goodbody, the footprint of the structures on site varied and changed throughout the passage of time too. In the twentieth century extensive alterations and additions were made to the former flour mill, firstly with the conversion to an electricity generating station and subsequently for use of the site for industrial purposes.

Remaining Structures on site - Internal

As agreed with WCC in 2022, to safely reduce the height of the Chimney, the factory building, built c. 1950's, was demolished, exposing the older structures to the rear. As illustrated in the photographs above, these structures have undergone significant alterations over time. The windows have been replaced, and large portions of the exterior walls are now faced with concrete, which drastically changes the building's original appearance.

Internally, the structure has been gutted and renovated, with new walls and floors installed. More notably, the photographs below reveal that concrete columns now support the floors above, indicating that the original flooring has been entirely removed and replaced with concrete floors. These new floors, supported by concrete columns, have been installed at varying levels, resulting in floor-to-ceiling heights that are not suitable for conversion into new uses. This misalignment is particularly problematic as the window levels no longer correspond with the new floor levels.

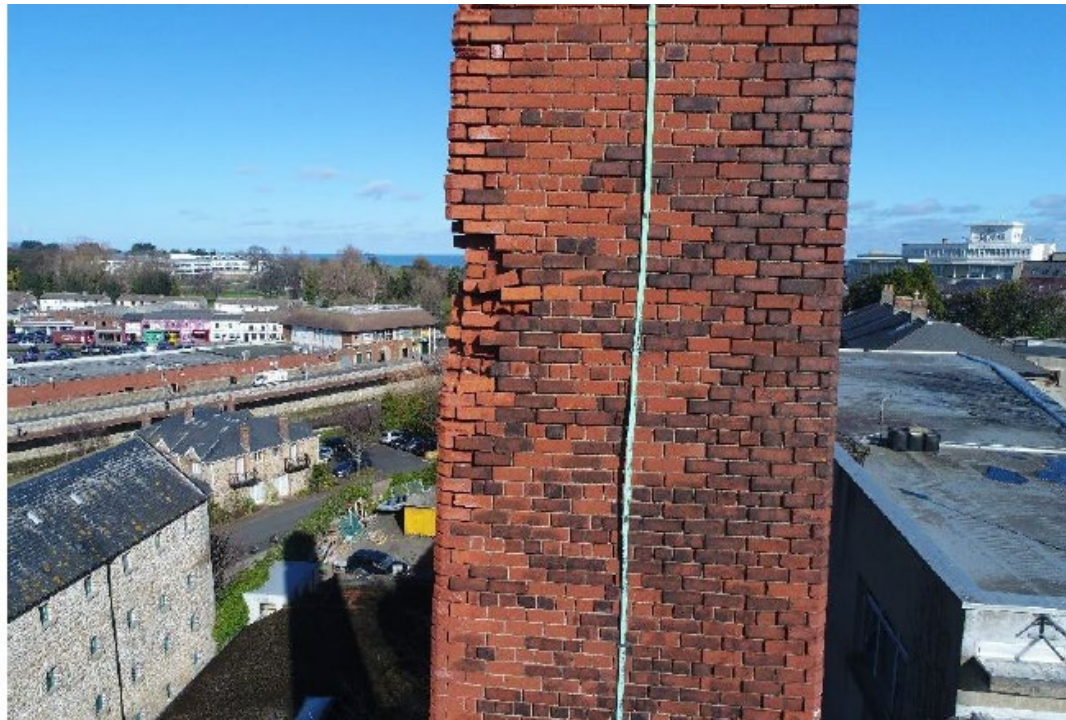
The building now retains very little of its original character due to extensive changes both to the external façade and the interior. The introduction of concrete has substantially diminished the historic integrity of the structure, making it difficult to appreciate its original form or adapt it meaningfully for future purposes.



Chimney



- Riverside Works contains a red brick chimney constructed in 1896 for the Bray Electric Lighting Company. In the late 1980s, a large section of approximately 10 feet was removed from the top due to damage caused by Hurricane Charlie. This reduction lowered the original height of 100 feet, but unfortunately, it also left exposed brickwork vulnerable to further deterioration from the elements.
- Over time, the mortar within the chimney eroded significantly, causing the bricks to fall out in an unpredictable manner, which posed a considerable health and safety risk.
- Following several engineering and surveying reports, and with approval from Wicklow County Council (WCC), the height of the chimney was further reduced by 33ft (10 meters) in late December 2022/early January 2023 to mitigate the ongoing safety concerns.
- While the mortar continues to degrade in certain areas, the chimney no longer presents an immediate threat to public safety outside of the site.
- As good custodians of the site the bricks that were removed during the height reduction process have been carefully cleaned and stored for future re-use. It is our intention to rebuild.



Chimney



Bricks removed,
cleaned and
safely stored on
site.

Protected View of Chimney

Schedule 10.14 (b) Protected Views and Prospects

| Bray Ref | |
|----------|--|
| 12 | The view from the Harbour Bridge of the Maltings and the former power station chimney. |



According to the 2018 LAP for Bray, **Schedule 10.14 (b) Protected View and Prospects, Bray Ref #12** is *The View from the Harbour Bridge of the Maltings and the former power station Chimney*. However, neither the chimney nor The Maltings are visible from the Harbour Bridge. The reason for this is that the view from the Harbour Bridge has been obstructed by the DART railway line, which effectively blocks any sightlines to the Bray town from the Harbour.

Given this clear obstruction, we believe that the inclusion of this view in a Protected View from the Harbour Bridge is no longer viable.

Not to mention the proposed bridge for bus and Luas at this location, construction of which will restrict the view even further.

Therefore, we suggest that this particular Protected View and Prospect be removed from the list of Protected Views and Prospects.

The chimney does not contribute to the visual amenity from this location, and its inclusion in the Protected View and Prospect designation is no longer justified.

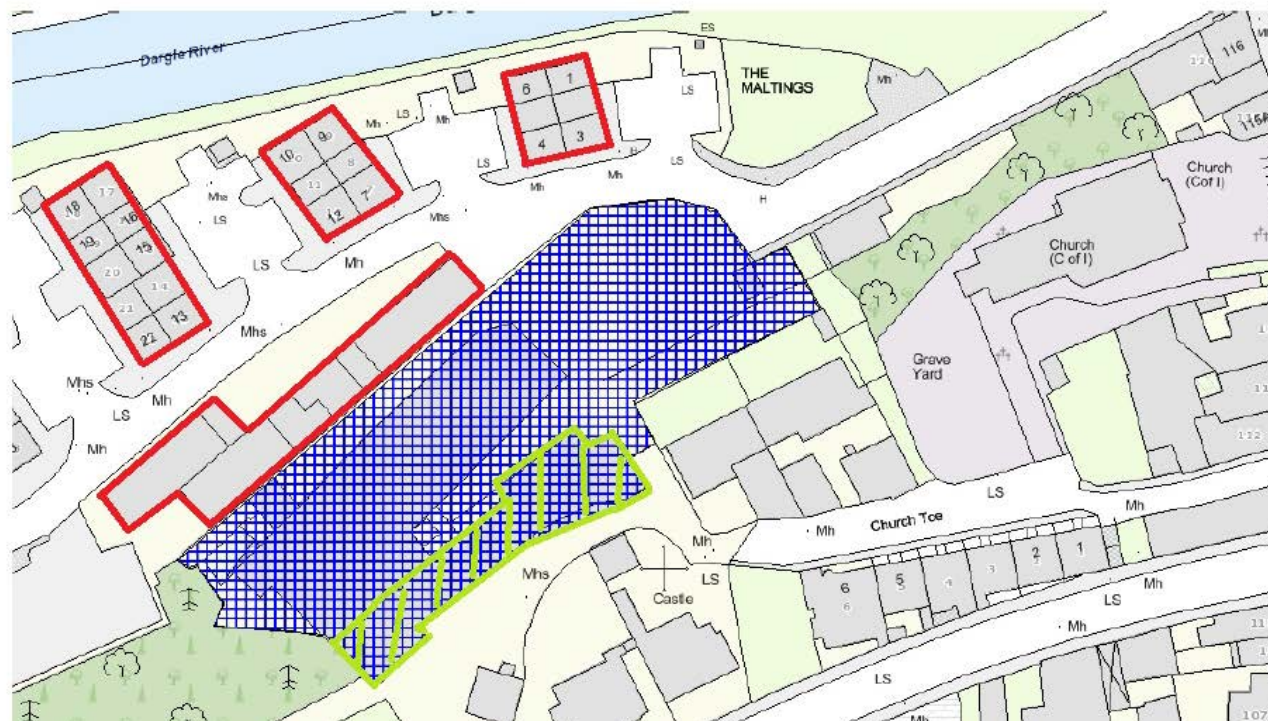
2018 LAP – OP4

Riverside Works – Opportunity Site

We disagree with the following points from the 2018 LAP:

1. **The Name of the Subject Property** – The property is referred to as Former Chemical Plant in OP4. It should be noted here that the council is clearly delineating between the Former Chemical Plant and The Maltings in its own internal documentation. Given the property has been known as Riverside Works for many years and since before its use as a Chemical Plant we recommend renaming it to Riverside Works.
2. **We request the removal of any reference to "The Maltings"** for this property – the Maltings has been developed as shown in the image opposite where the Maltings is clearly indicated in red.
3. **The Site Outline** – The blue-hatched area includes O’Rahilly Hall, a 1950s structure located to the south of Riverside Works. O’Rahilly Hall is only accessible via Church Terrace, which is situated approximately 9 meters higher than the ground level of Riverside Works. Since there is no direct link between the two properties, they should not be considered as one.

OP4 Former Chemical Plant and The Maltings



4. **Redevelopment of O’Rahilly Hall** – O’Rahilly Hall is only accessible through the narrow Church Terrace, which makes it both commercially and physically unsuitable for redevelopment. In our opinion, the property’s current condition is unattractive and detracts from the visual landscape. Given its limitations and appearance, we believe the best approach would be to build in front of it, allowing for a more functional and visually appealing development.

Riverside Works – Height of Structures

The 2018 Local Area Plan (LAP) proposed a "new, high-intensity mixed commercial and residential development" at Riverside Works. Additionally, the National Planning Framework (NPF) has set out National Policy Objectives that support taller buildings.

| | |
|---------------|---|
| NPO 35 | Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights. |
|---------------|---|

In recent years, Bray has seen planning applications for buildings taller than four stories being rejected, with recent examples including Ballymore Sea Gardens (ranging from 3 to 12 stories) and Castle Street (6 stories). Both of these developments are in prominent locations along the Dargle and Castle Street.

5.3 Bray Town Centre Specific Objectives:

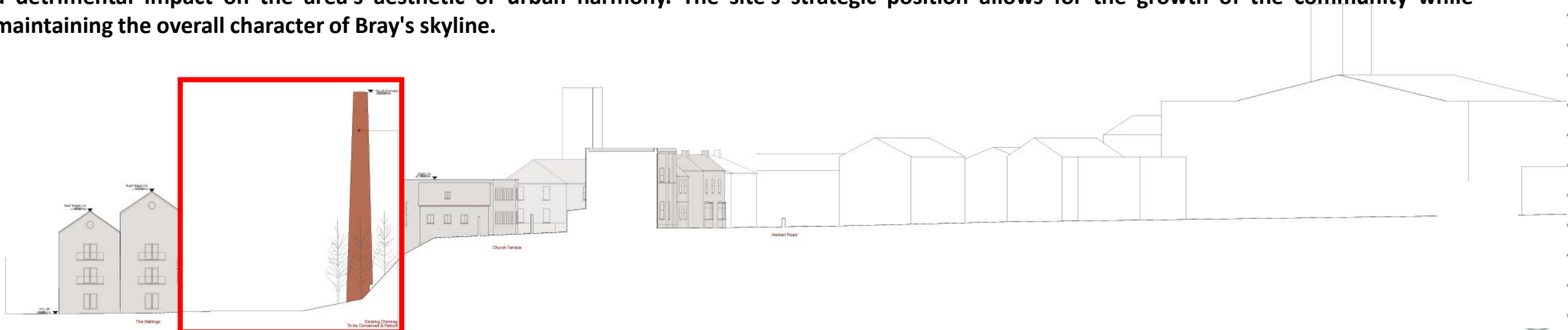
BT3 *Generally, a height of 4 storeys (including ground floor) will be considered appropriate in the Bray 'town centre' zone, irrespective of adjoining property heights. However, the Council may permit heights above this, where the specific context of the site and the design of the building allow it (for example where additional storeys are set back from street frontage).*

Riverside Works – Height of Structures

While residential blocks over four stories would typically impact the visual character and skyline of a town like Bray, Riverside Works stands out as a unique case due to its distinct topographical features. Situated with a steep escarpment to the south and a notable difference in ground level of approximately 9 meters (circa 3-stories) between the higher and lower parts of the site, the location presents a natural division between the building areas. This dramatic variation in elevation means that even with the addition of a taller building, it would not interrupt or overshadow the town's skyline in the same way that high-rise development might in more exposed or prominent locations. Instead, the topography allows for a more subtle integration of taller structures, minimizing visual disruption.

For a clearer comparison, considering a 9-meter difference in ground levels, the fourth floor of a property built on Riverside Works would be positioned at the same level as the ground floor of Church Terrace. This significant difference in elevation helps to illustrate the relative heights between buildings in the area. In the context of Riverside Works, this means that if we were to construct a seven-story building on our site, it would rise to the same height as the top of O'Rahilly Hall, taking into account the 9-meter variance in ground levels. This comparison highlights the potential impact of a new structure on the surrounding landscape and provides a clearer understanding of how a building of increased height would align with existing buildings in terms of overall height. By understanding this relationship, we can better assess the visual impacts of a 7 storey building on Riverside Works.

Given these considerations, Riverside Works proves to be an ideal site for high-density development. The natural topographical barriers, combined with the relatively less intrusive position of the land in relation to Bray's town centre, suggest that a building exceeding four stories would not have a detrimental impact on the area's aesthetic or urban harmony. The site's strategic position allows for the growth of the community while maintaining the overall character of Bray's skyline.



Wicklow County Development Plan 2022-2028 - Height

Wicklow County Development Plan 2022-2028

6.3.7 Quality of Design in New Housing Developments

Developments should include an **effective mix of heights** that integrates well with the existing urban structure and historical streetscapes

Urban Development & Building Height Guidelines for Planning Authorities (2018)

The 'Urban Development and Building Heights Guidelines for Planning Authorities' acknowledge that **increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas** particularly the large towns through **enhancing the scale and density of development**. The Guidelines require that **building heights must be generally increased in appropriate urban locations...**

Proposals including **buildings that are of a height and scale significantly greater than the prevailing height and scale** shall be assessed in accordance with the development management criteria set out in Section 3.0 of the Urban Development and Building Heights Guidelines (DHPLG 2018).

In accordance with Specific Planning Policy Requirement (SPPR) 1 of the Urban Development and Building Height Guidelines for Planning Authorities (2018), Local Area Plans (LAPs) shall **identify locations where increased height and density will be supported** where it forms part of strategic redevelopment, regeneration and infill development proposals.

Wicklow County Development Plan 2022-2028 - Height

CPO 6.17

To facilitate development incorporating higher buildings (i.e. buildings that exceed the contextual prevailing height) where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) or any subsequent height guidelines. In accordance with the SPPR 3 of Urban Development and Building Heights Guidelines, where:

- an applicant for planning permission sets out how a development proposal complies with the Urban Development and Building Heights Guidelines, particularly SSPR1 and SPPR2 thereof; and*
- the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and Guidelines;*

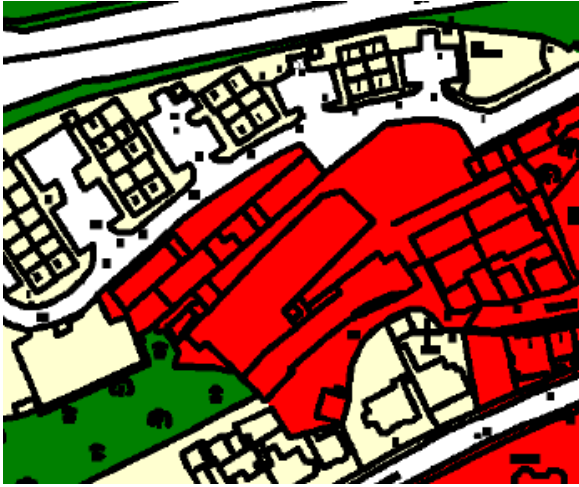
then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

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

CPO 6.18

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

Riverside Works – Density & Zoning



In the 2018 Bray Local Area Plan (LAP), the Riverside Works site was identified as a specific Opportunity Site (OP4), with the potential to play a key role in the revitalization of the town centre. If developed, this site is expected to contribute significantly to the enhancement of the public realm, the vibrancy and vitality of the area, and the diversity of the retail and services offering in the town centre. This designation underscores the site's potential to become a focal point for positive transformation in the region.

The key objectives for the Riverside Works site, as detailed in the 2018 LAP, are as follows:

Mixed-Use Redevelopment: The plan supports the redevelopment of the site for a diverse range of uses, including commercial, residential, community, and cultural purposes. The LAP emphasizes that retail development will only be deemed acceptable if it complements the core retail area along Main Street, contributing to the vibrancy and viability of the town centre rather than competing with or detracting from it.

Residential-Only Developments: If the redevelopment focuses solely on residential use, without incorporating commercial or retail elements, this will be permitted. The plan allows flexibility in the type of mixed-use development proposed, ensuring that residential projects can be brought forward without mandatory inclusion of retail or commercial components.

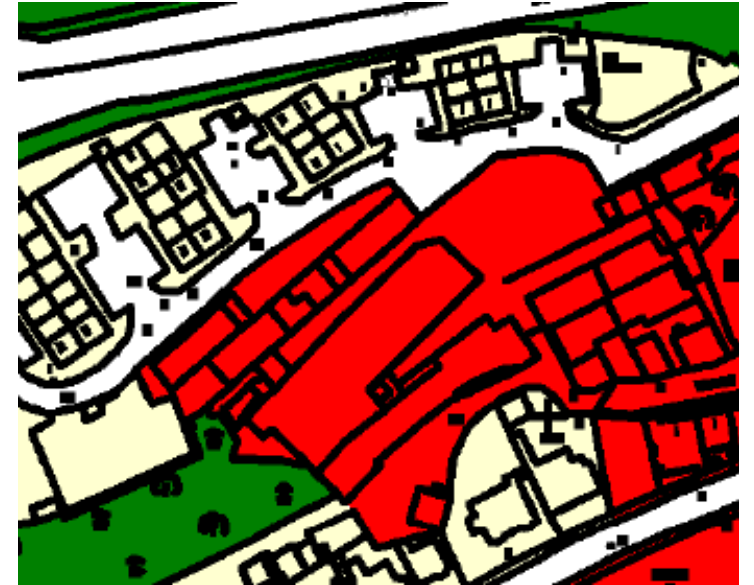
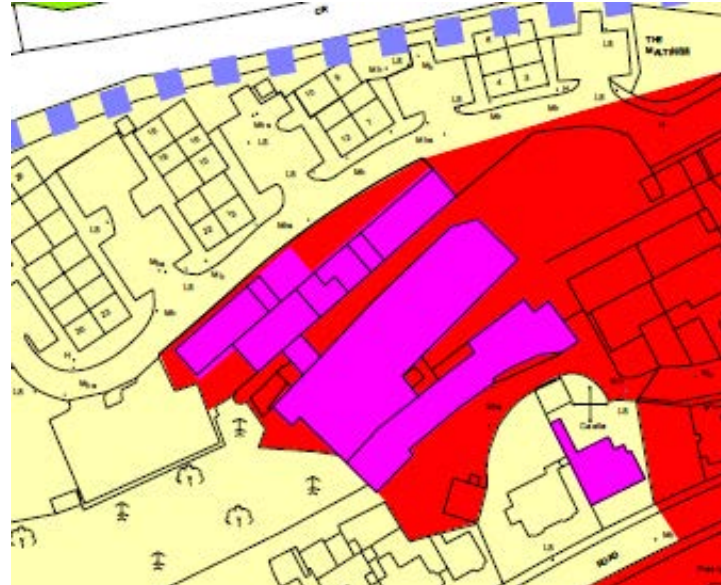
High-Density Development: The LAP emphasizes the importance of high-density development to make the best use of this strategically located, serviced urban land. The expectation is that the site should be developed in a way that maximizes its potential while aligning with the broader objectives for sustainable urban growth and efficient land use.

Riverside Works – Density & Zoning

In line with these objectives, we are fully supportive of the continued Town Centre zoning for the Riverside Works site. This zoning provides a strong foundation for creating a development that is consistent with the vision for Bray's town centre as an active, mixed-use hub.

We are currently in the advanced stages of the design process for a mixed-use development at this location. The proposed development aims to balance residential, commercial, and community spaces in a way that complements the surrounding area and fosters a dynamic and integrated town centre.

We are on track to submit a planning application for this development in the first quarter of 2025. This timeline reflects our commitment to delivering a thoughtful, high-quality development that aligns with the strategic goals set forth in the 2018 LAP and contributes positively to the future growth and success of Bray's town centre.



2025 LAP Other Objectives

Transport

- **Luas to Bray** – There is great potential to further enhance public transport options between Bray and Dublin City Centre. The Luas is a crucial component of Dublin's public transport network, providing fast, efficient, and sustainable travel options for commuters. Currently, the Luas line terminates at Cherrywood, but there is an established and agreed-upon route for its extension to Bray. This extension would not only improve connectivity but also alleviate pressure on the existing transport infrastructure, providing a reliable and environmentally friendly alternative for daily commuters. In light of this, it is essential that a new planning application, including revised environmental impact assessments, be prioritized to ensure the timely and efficient delivery of this extension. This project would significantly improve the overall transport network and contribute to the ongoing development of Bray as a vibrant and well-connected town.
- **Bray Bridge Upgrade – Addressing the Increasing Demands on Bray's Infrastructure:** As Bray continues to grow and experience increased traffic, there is a pressing need to upgrade the town's bridge infrastructure to accommodate this growth effectively. One key project involves enhancing the safety and accessibility of the Fran O'Toole Bridge. This would involve improvements specifically for pedestrians and cyclists, ensuring their safety and convenience while crossing.

In addition to these upgrades, a new bridge should be constructed closer to the harbour. This new structure would be designed to carry commercial vehicles, buses, and possibly Luas traffic, helping to alleviate the congestion on Fran O'Toole Bridge. By redirecting traffic to this new bridge, it would not only reduce the strain on the existing bridge but also improve traffic flow in the area.

The new bridge would be strategically placed near the transport hub at Bray Daly Station, ensuring seamless access to public transportation. This comprehensive approach to upgrading Bray's bridges will not only address current traffic demands but also support the town's future development while improving safety and connectivity for all commuters.



Transport

- **Bicycle Parking** – There is a noticeable shortage of bicycle parking facilities in Bray Town Centre, which hinders the growth of active travel in the area. As cycling becomes an increasingly popular and environmentally friendly mode of transport, the lack of sufficient bicycle parking is a significant barrier to encouraging more people to choose cycling over other less sustainable forms of transport. Active travel is a central priority of the National Planning Framework, and Bray's local transport infrastructure must reflect this priority. To accommodate this growing demand, it is essential that the upcoming Bray Local Area Plan (LAP) includes provisions for an expanded and well-designed network of bicycle parking facilities. This would not only make cycling more convenient but also contribute to reducing traffic congestion and lowering the town's carbon footprint. By investing in proper bicycle infrastructure, Bray can become a more sustainable, cyclist-friendly town that aligns with national objectives for cleaner, greener, and healthier travel.
- **Greenway from Bray Harbour to Powerscourt** – The Greenway connecting Bray Harbour to Powerscourt, which was first proposed in the 2018 Local Area Plan, should be a top priority moving forward. This active travel route would provide an excellent opportunity to promote cycling, walking, and other forms of sustainable travel, while also offering a scenic, enjoyable alternative to traditional transport routes. With the recent completion of the Dargle Flood Defences, the timing is now ideal to advance this Greenway project, as the necessary infrastructure is in place to support its development. This Greenway would not only improve connectivity between key locations in Bray but would also serve as a major attraction for visitors and residents alike. It would enhance Bray's overall attractiveness as a destination for active recreation and tourism, support local businesses, and improve the quality of life for residents by offering more opportunities for outdoor activities. Furthermore, this Greenway would be an important part of the broader regional transport network, helping to reduce dependence on cars, alleviate traffic congestion, and contribute to the area's sustainability goals. As such, it is crucial that this proposal be given the attention and resources needed to bring it to fruition in the near future.



Summary of Recommendations

We respectfully recommend the following updates and changes:

- 1. Correction of the mapping in relation to Listing B56 – The Maltings. Riverside Works and O'Rahilly Hall were included in error.** We request that the Record of Protected Structures (RPS) map be updated to exclude Riverside Works and O'Rahilly Hall. Listing B56 on the RPS specifically identifies "The Maltings" as a protected structure. However, Riverside Works has been legally and entirely separate from The Maltings since the 1860's. The Maltings is a distinct property, and its designation as a Protected Structure should remain. The remaining structures at Riverside Works are in a state of dereliction and hold minimal to no heritage value post works done around 1950 to replace the entire interior with a concrete frame construction. Similarly, O'Rahilly Hall, built in the 1950s, lacks any heritage value and is in our opinion an unsightly presence on the Bray Skyline.
- 2. Removal of the Protected View/Prospect of the Chimney at Riverside Works from the Harbour Bridge:** We recommend the removal of the protected view of the Maltings and former Power Station Chimney at Riverside Works from the Harbour Bridge. The view is obstructed by the DART line and will only be made even more unviable by the proposed new bus/luas bridge making it inaccurate to designate it as a protected sightline. The view no longer reflects the reality of the sightlines and have not done so for many many years (likely since the Harbour bridge was washed away in 1986) and therefore the Protected views list should be updated accordingly.
- 3. Renaming of the Subject Site in the 2025 LAP:** We recommend that the subject site, specifically outlined in OP4 of the 2018 Bray Local Area Plan (LAP), be re-named to "Riverside Works" in the upcoming LAP documentation to reflect the legal name of the property. It is referred to as Bray Chemicals and this is confusing. The Maltings is entirely separate, and it serves no value in calling any of this property "The Maltings" as it is an entirely separate property with adjacent but unconnected buildings.

Summary of Recommendations

5. **Removal of O'Rahilly Hall from the Redevelopment Curtilage of Riverside Works:** We recommend that O'Rahilly Hall be removed from the redevelopment area outlined for Riverside Works. The two properties are distinct in both ownership and location. O'Rahilly Hall is accessible solely from Church Terrace, off Herbert Road. Its ground floor is 9m above the current ground floor in Riverside Works. The standalone redevelopment of O'Rahilly Hall is hindered by its limited access via the narrow Church Terrace, making it physically and commercially unsuitable for redevelopment. The narrow access restricts the movement of goods, services, and critically emergency response, while also complicating compliance with modern building regulations.
6. **Consideration of Riverside Works for High Density and Increased Heights:** We believe that Riverside Works, given its location and characteristics, is well-suited for high-density development and buildings of increased heights. The site offers an opportunity for substantial development that could contribute to the overall growth of Bray while minimizing impact on the surrounding environment, particularly due to its unique topography and separation from other key structures. Essentially the top of the 3rd story at Riverside Works will be roughly inline with the ground floor of another building given the 9m height difference.

Summary of Recommendations

- 7. Priority for Public Infrastructure Upgrades in the LAP:** We recommend that the Local Area Plan prioritize essential public infrastructure upgrades to support the growth and development of Bray, including:
- i. The extension of the **Luas line** to Bray, which would improve connectivity with Dublin City Centre and reduce pressure on existing transport routes.
 - ii. The upgrade of the Bridges in Bray to meet growing demands. The Fran O'Toole Bridge should be made safer for Pedestrians and Cyclists and a new bridge to carry commercial vehicular, bus and potentially Luas traffic to be built closer to the harbour to remove traffic from Fran O'Toole Bridge and direct it closer to the transport hub at Bray Daly Station.
 - iii. The provision of increased bicycle parking in Bray Town Centre to support active travel initiatives and align with the priorities of the National Planning Framework.
 - iv. The advancement of the Bray to Powerscourt Greenway, which would enhance active travel routes and provide an environmentally friendly transport option, while also boosting tourism and local connectivity.

We believe that implementing these recommendations will improve Bray's infrastructure, sustainability, and overall development potential.



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