



Pre Draft Bray LAP Submission - Report

Who are you:	Group
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SaveBray submission on Bray_s 2025 Local Area Plan.Dec.24.docx, 0.03MB

8 Reasons Fact Sheet.docx, 0.02MB



16th December, 2024.

A Chairde,

We wish to make a submission to the 2025 Local Area Plan for Bray & Environs.

1) Our first concern centres on the proposed public transport bridge across the Dargle River, next to the railway bridge, and its accompanying access roads. We can find no reference to this in any of the topics proposed on Wicklow County Council's pre-draft consultation portal, yet it is an extremely important infrastructural proposal which will affect Bray's traffic, road safety, flood risk, and our local swan population enormously, well into the future.

We fully accept that Bray needs another bridge, but this proposed bridge is the wrong design in the wrong location. The reasons why it should not be built are clearly outlined in the attached '8 Reasons' fact sheet. The reasons are researched and evidence based.

We submit that this bridge should be redesigned, and relocated upriver, closer to the M11.

2) Our second concern is connected to the first in that it is regarding the flood risk inherent in building on the flood plain of the former Bray Golf Club lands. The access road from the north proposed to cross the floodplain to this bridge would add to the already significant dangers posed to the people of the low-lying areas of Little Bray: this area houses a particularly high percentage of very vulnerable people, both elderly and/or disabled.

A road that will measure over 15m wide¹ would diminish that floodplain, and dam it at its eastern end - the same flood plain that has provided an instant escape route for flooding in Little Bray twice in the lifetime of many of its older residents.

Flood defences completed in 2017 have made these residents safer from flooding, but not safe, as clearly outlined in '*The Planning System and Flood Risk Management*' at pp16² and 24³, adding that areas defended: "can be particularly vulnerable due to the speed of flooding when over topping or a breach or other failure takes place". Finally, it is very clearly answered in a 'Frequently Asked Question' regarding the benefits of a 'high-standard flood defence' on p71⁴.

For that reason, the Sequential Approach is demanded, i.e. Avoid, Substitute, Justify, Mitigate, Proceed on p22⁵, with the first step laid out on the same page - "Avoid, preferably choose lower risk zones for new development". Flood Zones are categorised on p17⁶, and summarised on p24⁷, along with the types of development allowed on each.

Some 3.5 hectares of flood plain on the former golf links, from west to east in a long, narrow corridor alongside the river, has long been acknowledged as what is described in the Guidelines as a Flood Zone A, the highest category of risk. This is clearly shown in Map No.16 of Bray Maps2 in Bray Town Development Plan 2011⁸. This map agrees with local residents' experience of the floods, with Ordnance Survey and OPW maps, and with Charlie Bird's report on Hurricane Charley 1986⁹.

The latter shows clearly (at 1.26 minutes into the clip) that the flood waters at their northern point reached the line of trees just below the old club house: the club house was not flooded because the ground rises to the north.

Yet in Bray's (present) 2018 Local Area Plan, that Flood Zone A has been extended to cover most of the former golf club lands, according to the map legend on Map SFRA2 (a) of its Appendix C - Strategic Flood Risk Assessment¹⁰. The flood plain's northern border in this map reaches up close to the old Ravenswell Convent, well beyond the old club house, and stretches across to the storm tank that is now surrounded by Ballymore's new development, located between a playing area on one side and houses on the other.

In the same document, at p20¹¹, an extract from Map SFRA2 (a) is shown at the top of the page, with the same delineating line as in the flood zone map. The former golf club lands, presumably referencing its entirety, is marked as B3 (a), and here it is shown as Flood Zones A and B (without distinguishing between the two). Its Land Use is given as 'Mixed Use'.

The Justification Test necessary to allow building dwelling houses on a Flood Zone A or B is passed only because this enormous apparent increase in flood risk leaves "no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding" (2 (v) of the Justification Test). *Yet the only major change that occurred at this site between 2011 and 2018 was the erection of flood defences, including alongside the former golf club lands, concluded in 2017. At the same time, the flood risk on these lands, according to Bray's 2018 LAP, has increased enormously.*

Within the Heritage section of Bray's 2025 LAP portal another map shows flood zones¹², and this time the difference between Flood Zones A and B is clear. However, again the flood zones have been extended, with Flood Zone A now covering roughly double the distance from the river as in the 2011 plan, by reaching, and traversing at the eastern end of the site, the old schools' road. *In other words, according to Bray's LAPs, the highest risk of flooding has doubled on this land since flood defences were put in place.* Flood Zone B is shown as a much smaller 'border' along the northern and eastern edges of Flood Zone A.

Because of the way in which the owners of this land - Ballymore - have broken down their applications, this would mean that their proposed second phase will be almost entirely within a Flood Zone A, and, as they have already built on the land above the schools' road, there will no longer be "suitable alternative lands for the particular use or development type, in areas at lower risk of flooding" (2 (v) of the Justification Test). If they had applied to develop the entire site at the same time, it would fail the Justification Test.

The contrast between Bray's 2011 Development Plan and its 2018 and (proposed) 2025 LAPs is further compounded by the designation of flood zone given in its bridge and access road proposal. Here, in the final paragraph of p23 of its Flood Risk Assessment¹³, the lowland of the former Bray Golf Club lands is summarily dismissed as a Flood Zone C - the lowest category of risk, contradicting all of Bray's development plans. "A Justification Test for the development is therefore not required", according to this report.

Meanwhile, in Ballymore's concurrent successful application to build on the former golf club lands, they show Flood Zone A as a long, narrow strip of land, below the club house, extending from west to east, in their Fig. 6.2 on p36¹⁴. *This closely resembles Bray's 2011 development plan's flood zoning.*

The only thing that all of these maps contradictory maps agree on completely is that the highest risk of flooding occurs on this site on the land closest to the river. This makes sense. Rivers, whether in flood or not, always flow along the lowest point, they always head to the sea, and, when they overflow onto their floodplain, they try to return to the river bed as soon as the flooding has abated.

Therefore, we submit that the 2ha public park already promised on this site by the developer should be located immediately beside the flood defence wall, running from the western end of the site to the boundary of the agreed 'Coastal Garden', already permitted at its eastern end – and that the Land Zoning assigned to this public park, and the Coastal Garden, should be Open Space. This would protect the same long, narrow flood path that has traditionally provided a safe storage area for Little Bray's lowlands in times of flooding. Housing units should be pushed back, away from the flood defence wall, as per the Sequential Approach. If the increased area of flood risk shown in Bray's 2018 and proposed 2025 plans are correct, at least that lowest part of the land will flood first, giving uphill residents further time to salvage what they can – and to be evacuated, if necessary.

This is in line with the important development principle outlined in paragraph 3.1 'Planning Principles' of p22 (pdf p30) of the Flood Risk Management Guidelines¹⁵:

"Land required for current and future flood management, e.g. conveyance and storage of flood water and flood protection schemes, should be pro-actively identified on development plans and LAP maps and safeguarded from development."

It is also in line with Wicklow's repeated references to the now mandatory Guidelines in all of their development plans.

We also submit that the rest of the lower land (below the old schools' road) should be preserved for housing, not for an access road that will further endanger any dwelling houses built on any part of the Dargle floodplain.

Yours sincerely,

Noeleen McManus for SaveBray Community Alliance

Dr. Anne Marie Byrne for SaveOurFloodplain

Marcia Nicholson for the Swan Rescue Team

Dave McFarlane for Seapoint Court Residents' Association

Sarah Harrison for DARA (Dargle Area Residents' Association)

Herbert Wright for Coburg Residents' Association

Niamh Wogan for Bray Family Resource Development Project

References:

- ¹ Table 1 on p6 of the Preliminary Design Report for Bray Sustainable Transport Bridge at <https://www.wicklow.ie/Portals/0/adam/Documents/HYiPM76bmUC5BnSa8YWT7g/Link/App%20B%20-%20Prelim%20Bridge%20Design%20Report.pdf>
- ² Paragraph 2.25 on p16 of 'The Planning System and Flood Risk Management' at <https://www.opr.ie/wp-content/uploads/2019/08/2009-Planning-System-Flood-Risk-Mgmt-1.pdf>
- ³ Paragraph 3.4 on p24 of same document.
- ⁴ P71 of same document.
- ⁵ Fig.3.1 on p22 of same document.
- ⁶ Paragraph 2.23 of p15 of same document.
- ⁷ Paragraph 3.5 on p24 of same document.
- ⁸ Map No. 16 of Bray Maps2 in Bray Town Development Plan 2011 at https://www.wicklow.ie/Portals/0/Documents/Planning/Development-Plans-Strategies/Local-Area-Town-Settlement-Plans/Bray/Bray-Town-Development-Plan-2011-2017/Bray_Map2_2011.pdf
- ⁹ Hurricane Charley 1986 on RTE Archives at <https://www.rte.ie/archives/2021/0817/470307-one-of-the-worst-hurricanes-in-living-memory/>
- ¹⁰ Map SFRA2 (a) of Appendix C - Strategic Flood Risk Assessment – the second map following p41 of <https://www.wicklow.ie/Portals/0/Documents/Planning/Development-Plans-Strategies/Local-Area-Town-Settlement-Plans/Bray/Bray-Municipal-District-Local-Area-Plan-2018/Appendix%20C%20-%20Strategic%20Flood%20Risk%20Assessment%20-Bray%20MD%20LAP%202018.pdf>
- ¹¹ P20 of same document.
- ¹² <https://bray-md-lap-wicklow.hub.arcgis.com/pages/heritage>
- ¹³ Final paragraph of p23 of Flood Risk Assessment (Appendix H) for Bray Sustainable Transport Bridge at https://www.wicklow.ie/Portals/0/adam/Documents/SPiGQ062M06VQHxm_SU3tA/Link/App%20H%20-%20Flood%20Risk%20Assessment.pdf
- ¹⁴ Fig. 6.2 on p36 at <https://coastalquartershd2.com/wp-content/uploads/2022/documents/EIAR/EIAR%20Vol%203/Appendix%2010.1%20Flood%20Risk%20Assessment.pdf>
- ¹⁵ Point 7 of paragraph 3.1 'Planning Principles', on p22 of 'The Planning System and Flood Risk Management' at <https://www.opr.ie/wp-content/uploads/2019/08/2009-Planning-System-Flood-Risk-Mgmt-1.pdf>

8 Reasons why Wicklow County Council's proposed sustainable transport bridge

should **not** go ahead where, and as, it is planned:

- 1) It's right beside the railway line. Iarnród Éireann have already publicly acknowledged their fears for their east coast railway line due to rising sea levels and consequent coastal erosion, saying: "Some areas of the East Coast rail line have seen encroachment through the loss of coast of up to 20-30 metres in the last 10 years alone" Why would we build another multi-million bridge beside this? (See Project Background in <https://www.irishrail.ie/en-ie/about-us/iarnrod-eireann-projects-and-investments/ecripp>)
- 2) As recently as December 11th, *The Journal Investigates* detailed an internal report from the Department of the Environment, Climate and Communications warning that the number of homes at risk of falling into the sea due to coastal erosion has jumped by 173% in just five years. Approximately 570.5 km of roads have also been deemed in danger, an increase of 265 km since 2017. The report said the surge in numbers is likely an underestimate, as just half of local authorities impacted by coastal erosion were able to provide data. Quoting the Associate Professor of Geography at Trinity College, Mary Bourke, as describing the continued building and development on vulnerable coastal areas as "frankly irresponsible", the journalist who wrote the piece said on Morning Ireland, that "the report found that 5 of the 19 coastal councils are still allowing property to be built in areas of coastal erosion". Asserting that "nature should be allowed to take its course", Prof. Bourke is also quoted as saying: "I know we need homes, but there's no point in building on our flood plains, there's no point in building in coastal areas that are actively retreating, these need to be set aside." The Trinity academic said that realistically, the government should be looking at "implementing managed retreat in Ireland's worst affected areas, including the hard hit east coast". Wicklow County Council proposes to locate this bridge immediately west of the railway line in Bray: immediately east is Bray harbour.
(<https://www.thejournal.ie/investigates-coastal-erosion-6547689-Dec2024/> and <https://www.rte.ie/radio/radio1/clips/22470014/>)
- 3) The design of the bridge, similar to the Samuel Beckett bridge over the Liffey, has been shown to be highly dangerous to swans, as their poor forward eyesight and heavy bodies make it very difficult for them to see and to over-fly the high cable design of a suspension bridge. The proposed bridge would be directly on the flight path of our swan colony at Bray harbour, shortly after their take-off from the harbour.
(<https://www.irishtimes.com/news/environment/warning-issued-over-risk-of-swan-deaths-at-new-bray-bridge-1.4668724>)
- 4) It is highly dangerous to humans too because of its access road from the north diminishing and damming an already constricted flood plain. See the mandatory 'Planning System and Flood Risk Management Guidelines' at <https://www.opr.ie/wp-content/uploads/2019/08/2009-Planning-System-Flood-Risk-Mgmt-1.pdf>. Bray's Development Plans show an increase in Flood Zones A and B (the two highest categories of flood risk) on the former Bray Golf Club lands from 2011 to 2018, despite flood defence works being completed along the Dargle in 2017. In Wicklow's proposal for the sustainable transport bridge, however, the flood plain next to the river is categorised as Flood Zone C,

the lowest category of flood risk, directly contradicting Bray's development plans. The former categorisation allows the site to 'pass' the Justification Test required by the above Guidelines to allow housing to be built on Flood Zones A and B, while the latter 'justifies' building a high, wide embankment across the flood plain.

- 5) The Safety Audit submitted with Wicklow's plans is laden with criticism, warning that the design of this bridge is dangerous for both cyclists and pedestrians, as its constricted nature, especially where it passes between the old pumping station and the railway, means that pedestrians and cyclists will have to share the same lane at times. It is particularly dangerous where the bridge is proposed to end at the narrow, crooked junction between the only access to Seapoint Court and the railway bridge next to the Harbour bar.
(<https://www.wicklow.ie/Portals/0/adam/Documents/OdhBRy7-7kKinU82VPYiDg/Link/App%20I%20-%20Road%20Safety%20Audit.pdf>)
- 6) The proposed sustainable transport' bridge will divert public transport away from the town centre, north of the river: it will not take one single car off the Fran O'Toole bridge or its feeder roads. Surely any new bridge should be designed and located to divert cars away from the town centre, and instead use the Fran O'Toole bridge for public transport only, with safe pedestrian and cycle boardwalks (already proposed) on either side of it. The following document takes councillors' agreement to the proposed transport bridge for granted also, but admits (end of page 4) that a "new road bridge from Herbert Road to the Upper Dargle Road", where a bridge for cyclists and pedestrians has been planned at the Slang area for years now, "may be deemed necessary"
(https://www.nationaltransport.ie/wp-content/uploads/2019/04/Bray_Transport_Study_2019.pdf). A bridge at that location would allow cars to leave the M11 at the Fassaroe exit, mid-way between the Wilton Roundabout at Bray North (Junction 5) and the major roundabout near Brennanstown Riding School at Bray South (Junction 6), both permanently congested.
- 7) The coming of the Luas to Bray seems to be Wicklow's consistently declared *raison d'être* for putting this bridge in place at all. Yet the Luas is not even part of Wicklow's present proposal. The latest report that we can find on the possibility of the Luas being extended to Bray is from our local newspaper on 7th March last -
<https://www.independent.ie/regionals/wicklow/wicklow-district/blow-to-wicklow-commuters-as-plans-for-dart-and-luas-extensions-hit-setback/a1310490220.html> . Tom Galvin reported the NTA as saying: "Luas to Bray is part of the Medium-Term proposals for development and delivery within 2031-2036. *The alignment and the locations to be served have yet to be determined and will be the subject of future planning, appraisal and design work.* The enabling infrastructure required for this extension have therefore not been determined at this stage." By 2031-2036 will the Government's 'managed retreat' strategy not be in place already? Older plans for the extension of the Luas to Bray show other, more viable, options. Finally, while Minister Eamon Ryan delivered a somewhat cautious written reply on the subject in the Dáil in February this year
(<https://www.oireachtas.ie/en/debates/question/2024-02-20/178/>), he was much more definite in a verbal answer to a question from Deputy Cormac Devlin on 20th September, 2020 - <https://www.oireachtas.ie/en/debates/question/2020-09-24/10/> .
- 8) The safe ground on this land should be used to build homes, not roads. ...Ends...