



Pre Draft Bray LAP Submission - Report

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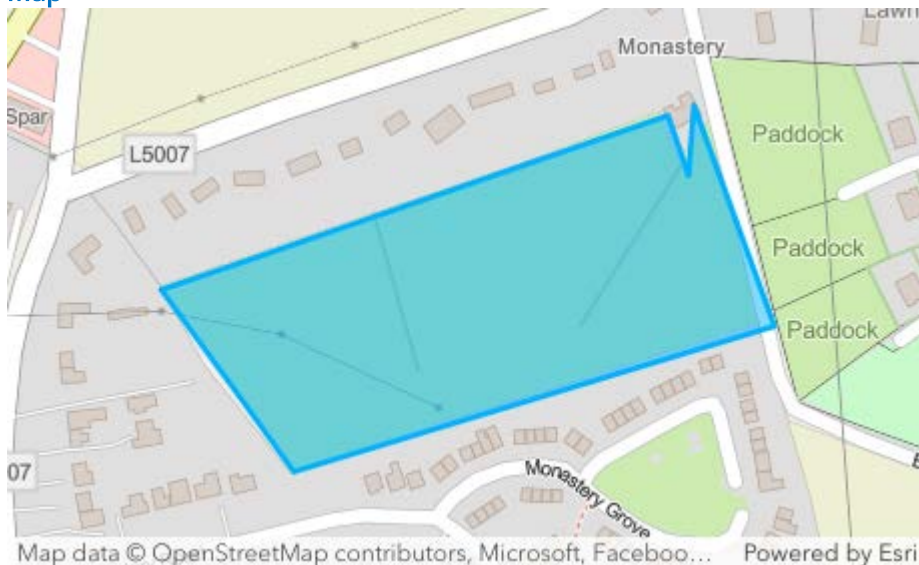
Topic

Compact Growth - Housing – Population Growth

Submission

Please see attached report.

Map



Site Description:

The site at Monastery off Ballyman Road

File

Final_Bray LAP Submission_Enniskerry.pdf, 3.49MB

TOWN PLANNING SUBMISSION



Pre-Draft Issues Paper Submission

Bray Municipal District Local Area Plan 2025

Submitted on Behalf Of:

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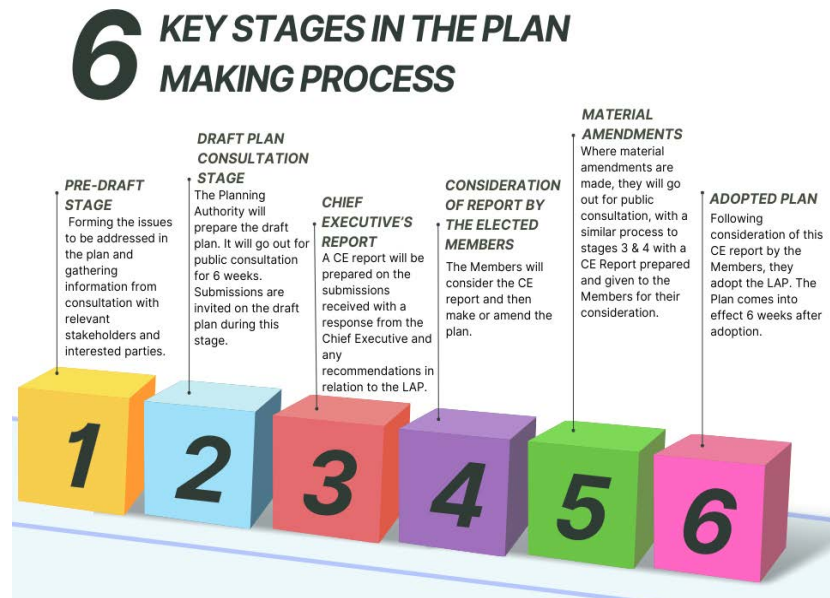
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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this submission on behalf of our client, Maeve Magee, who is the landowner of the Monastery lands along Ballyman Road in Enniskerry which forms part of the Bray Municipal District LAP. This submission is made in response to a public notice inviting general submissions to the pre-draft phase of the making of the Local Area Plan for the settlements of Bray, Enniskerry, and Kilmacanogue. Our clients are very keen to collaborate with the Planning Authority in progressing this plan and look forward to constructive engagement in its preparation.

The content of this submission will have regard to the Pre-Draft consultation booklet, together with the provisions of the Wicklow Development Plan 2022-2028 and other relevant National and Regional policy documents. In this context it is noted that the Monastery lands along Ballyman Road which is located within the Enniskerry Development Boundary, and comprises a residentially zoned area of 3.6 ha, has been identified as a suitable area to accommodate housing growth since the adoption of the Bray Municipal District Local Area Plan 2018-2024 as amended in the Wicklow County Development Plan 2022-2028.



One of the key themes of the new LAP as set out in the Issues Paper, is Housing, Population and Compact Growth. The paper specifically identifies Enniskerry as a focus for housing/population growth and states:

'Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet the housing targets set out in the Core Strategy.'

In this regard, we wish to note and emphasise, that the lands have been identified through the Wicklow County Development Plan 2022-2028 as suitable to accommodate growth and this submission seeks to retain this residential zoning to ensure that high quality residential development is provided within Enniskerry. It is also important to note at the juncture, that our clients are in the process of preparing a planning application for the lands which will be submitted in 2025 for the consideration of the Council. **This submission seeks to retain the residential zoning pertaining to our clients lands to ensure that the housing objectives of the LAP are achieved within the lifetime of the plan.**

The proceeding sections of this submission will therefore respond to the Key Issues/Questions within the Pre-Draft Consultation Booklet in the context of this overall vision for the site. We welcome the opportunity to contribute to this stage of the plan making process and trust that Wicklow County Council will have due regard to our submission.

2.0 The Monastery Lands along Ballyman Road, Enniskerry

The Monastery lands along Ballyman Road comprises 3.6 ha residential zoned land and is located in the North of Enniskerry, Co. Wicklow. The site is bordered by existing residential buildings to the North, South, and West; and Berryfield Lane to the East.

The subject site is serviced by the 44 bus which runs from Dublin City University to Enniskerry every hour from 7:00AM to 12:00AM, with a bus stop 160m from the subject site.

All of the lands in Enniskerry zoned 'New Residential' have been either developed on or have received planning permission. So, in principle, the subject lands at Monastery along Ballyman Road would be next for residential development.

Our client intends to apply for planning permission for residential development on the lands at Monastery along Ballyman Road. It is encouraged to retain the current zoning designation for these lands in the upcoming Bray Municipal District Local Area Plan 2025.



Figure 1.0 The lands at Monastery along Ballyman Road outlined in red.

3.0 Planning Context

This section of the pre-draft submission will examine the national, regional and local planning frameworks that inform the development of the LAP lands and provide specific guidance in respect of the delivery of housing growth at locations as such. Documents of note include the National Planning Framework (NPF), Housing for All – A New Housing Plan for Ireland, the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), and the Wicklow Development Plan 2022-2028. Each of the afore referenced documents will be discussed below in the context of the forthcoming Bray Municipal District LAP.

3.1 Relevant National and Regional Policy Content

3.1.1 Project Ireland 2040 – National Planning Framework

Published in 2018, Project Ireland 2040 – The National Planning Framework is the Irish government's overarching policy initiative which sets a vision and a credible development strategy to shape the country's national, regional and local spatial development in economic, environmental and social terms to 2040. The plan sets out ten National Strategic Outcomes (NSO's) which underpin the overarching vision for the country and serve as shared goals, as depicted in the extract below:

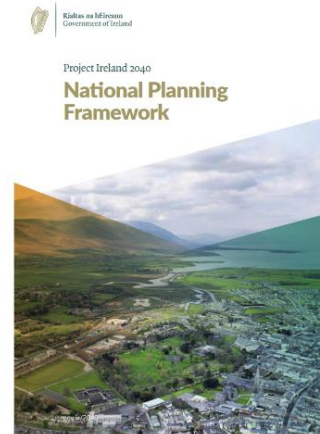


Figure 2.0 National Planning Framework and its National Strategic Outcomes and Priorities of the National Development Plan.

The National Planning Framework is focused on the compact development of existing urban areas to promote sustainable growth and allow for the increased viability of central services, shops and public transport in conjunction with the regeneration of existing built-up areas as opposed to the continual expansion and sprawl of cities and towns into the countryside at the expense of smaller villages. The NPF seeks to manage growth within the three regions of Ireland, which include the Northern and Western, Southern, and Eastern and Midland Regional Assembly areas, to allow for balanced growth and guided development. The following target is outlined in relation to national growth:

'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'

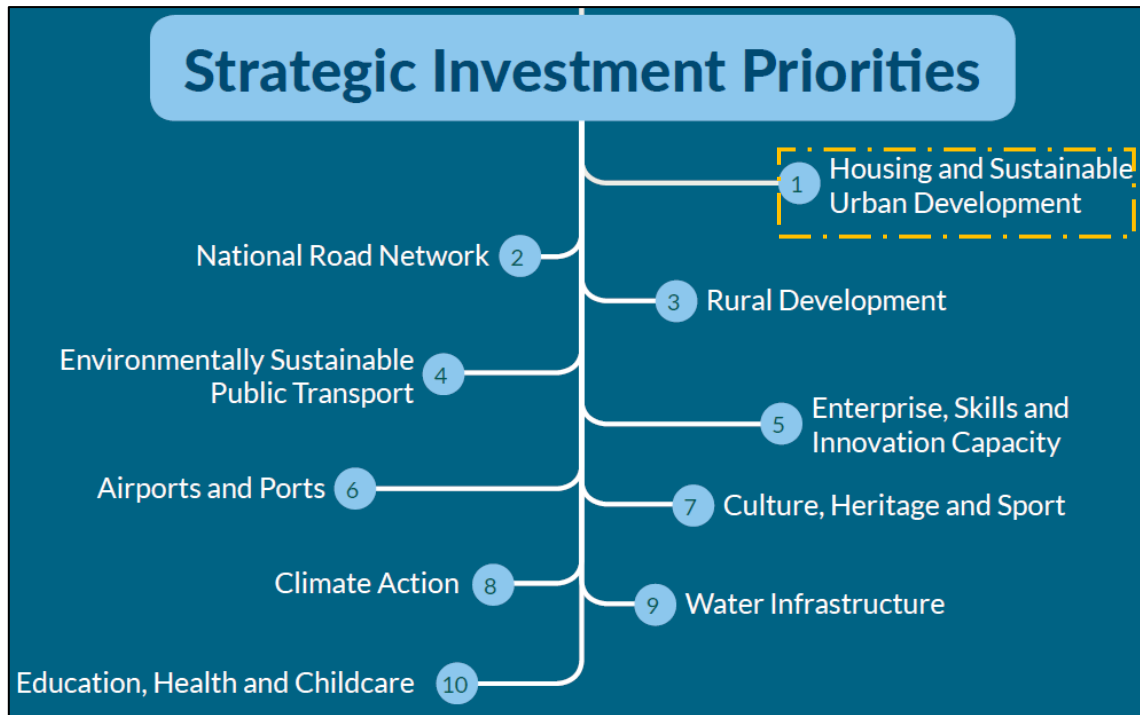


Figure 3.0 National Planning Framework and its National Strategic Investment Priorities of the National Development Plan. Culture, Heritage and Sport is included therein.

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m total)	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)	+160,000 - 180,000 people (1m total) +115,000 in employment (450,000 total)
2. Building Stronger Regions: Accessible Centres of Scale ²⁰	Dublin City and Suburbs: +235,000 - 290,000 people (at least 1.41 million total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: +105,000 - 125,000 people (at least 315,000 total) Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total) Waterford City and Suburbs: +30,000 - 35,000 people (at least 85,000 total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: +40,000 - 45,000 people (at least 120,000 total) RSES to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

Figure 4.0 National Planning Framework Targeted Pattern of Growth, 2040.

The above table provides a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale is to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units over the coming years, up to 2040 to meet a growing demand.

With regards to managing growth, Section 1.2 of the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of Dublin, Cork, Limerick, Galway and Waterford are targeted for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth. In addition, National Strategic Outcome No. 1 'Compact Growth', provides that the NPF is focused on the careful management of the sustainable growth of compact cities, towns and villages in order to add value and create more attractive places in which people can live and work. To achieve this outcome, there must be an increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village.

More specifically, strategies included in Chapter 2.2 of the Planning Framework seek to target a greater proportion **(40%) of future housing** development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas, such as Enniskerry per the following commentary from Project Ireland 2040 document:

*'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. **The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.** The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.*

The lands at Monastery along Ballyman Road are considered to be under-utilised, with the potential to provide for new residential development. The lands are considered an optimal location to accommodate a number of high quality residential dwellings, providing for a number of additional homes within Enniskerry. It is submitted that the lands have the potential to realise the goals and objectives as set out in the National Planning Framework (2018) by accommodating infill residential development.

A number of objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. We consider that the following national policy objectives to be of relevance:

- | | |
|-------------------------------------|---|
| National Policy Objective 3a | <i>Deliver at least 40% of all new homes nationally, within the built up footprint of existing settlements.</i> |
| National Policy Objective 3b | <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i> |
| National Policy Objective 4 | <i>Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i> |
| National Policy Objective 5 | <i>Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.</i> |
| National Policy Objective 6 | <i>Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can</i> |

accommodate changing roles and functions, **increased residential population** and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 11 *In meeting urban development requirements there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

National Policy Objective 33 *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*

National Policy Objective 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.*

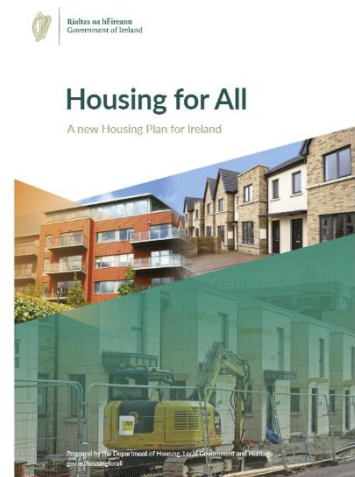
National Policy Objective 73a *'Guidance will be developed to enable planning authorities to apply an order of priority for development of land, taking account of proper planning and sustainable development, particularly in the case of adjoining interdependent landholdings.'*

In light of the above, it is considered that the subject lands present an ideal location for development in line with the objectives of the NPF as listed above and the forthcoming development of the lands in the short to medium term should be wholly supported. The provision of a medium density residential development on the subject lands, is in accordance with the NPF's target of **40% of new housing to be located within existing towns and settlements.**

3.1.2 Housing for All – A New Housing Plan for Ireland

'Housing for All - A new Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has 'access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.' The plan seeks to increase new housing supply to an average of at least **33,000 new units per year** with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, **Increasing Social Housing Delivery** and Supporting Social Inclusion;
- **Increasing New Housing Supply; and**
- Addressing Vacancy and Efficient Use of Existing Stock.



Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the extract overleaf.



Figure 5.0 Figure indicating the four pathways to Housing for All

Pathway No. 3 '*Increasing New Housing Supply*' stipulates a number of key aspects to providing for new homes, each of which are depicted in the extract overleaf. It is also noted within that by 2040, an additional one million people will be residing in Ireland. The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. In this context Section 3.1 of the Plan '*Increase Land Availability for Residential Development*' states that '*a steady supply of suitable and serviced zoned land is needed*' further providing that '*Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.*' The plan-led delivery of residential development on the lands at Monastery along Ballyman Road will provide for a high-quality residential scheme, which integrates with its wider surrounds, and will aid in meeting the residential output requirements as set out within the new *Housing for All* plan.

We submit that the delivery of plan led, residential-led development on the lands at Monastery along Ballyman Road is consistent with the above policy as it facilitates the provision of an appropriate quantum of residential accommodation on a serviceable site which is within easy reach of essential services and amenities. The provision of residential units on site also supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands, which have capacity to comfortably absorb additional development. The development of these lands will respond to a recognised need, at national level, for residential accommodation and for the growth of our cities and suburbs in a compact and sustainable manner.



Figure 6.0 Figure indicating the pathway to Increasing New Housing Supply

3.1.3 Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)

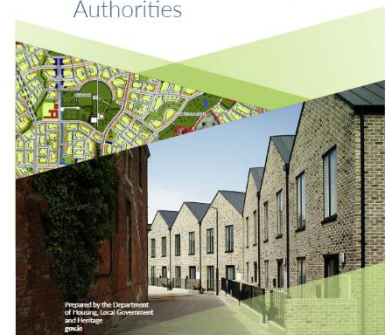
As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements.

Key to these new guidelines is the concept of the 15-minute city. Under said guidelines, settlement types are categorised on their area types and density ranges. Herein, the subject site can be described under the 'Small and Medium Sized Towns'. The key priorities for town growth in order of priority are to:

- a) *strengthen town centres*



Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities



- b) *protect, restore, and enhance historic fabric, character, amenity, natural heritage, biodiversity, and environmental quality*
- c) *realise opportunities for adaption, reuse, and intensification of existing buildings and for backland, brownfield, and infill development, and*
- d) *deliver sequential and substantial urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement*

Section 3.3.4 of the Guidelines titled '*Small and Medium Sized Towns (1,500-5,000 population)*' provides guidance in relation to the density ranges for such areas and indicates that the strategy for small and medium sized towns is to support consolidation within and close to the existing built-up footprint. Following our review of the Guidelines, it is considered that the Enniskerry LAP lands may be categorised under the *Small/ Medium Town Edge* heading which states the following:

Small/ Medium Town Edge

'Small / Medium Town Edge The edge of small to medium sized towns are the lower density housing areas constructed around the centre, while urban extension refers to greenfield lands at the edge of the built-up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that densities in the range 25 dph to 40 dph (net) shall generally be applied at the edge of small to medium sized towns.'

On the basis of the foregoing, and in considering same in the context of the LAP lands it is considered that a density of approximately 25-40 dph (net) would be appropriate and achievable on-site.

In addition to the above, Section 4.0 of the Compact Settlement Guidelines refers to '*Quality Urban Design and Placemaking*' and states that successful placemaking is the outcome of a careful process of consultation, planning, design and delivery that should work in an integrated way. On this basis, the following general steps are recommended to be followed in preparing an urban design framework for an area:

- (i) *Analysis and Appraisal*
- (ii) *Vision and Strategy; and*
- (iii) *Detailed Design*

Following on from the above, a number of Key Indicators of Quality Design and Placemaking are stipulated including:

- (i) *Sustainable and Efficient Movement*
- (ii) *Mix and Distribution of Uses*
- (iii) *Green and Blue Infrastructure*
- (iv) *Public Open Space; and*
- (v) *Responsive Built Form*

Policy and Objective 4.3 thereunder indicates that '*It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.'*

The responses provided in the following sections of this report to the Key Issues/Questions set out within the Pre-Draft Issues Paper will be provided in cognisance of the above criteria.

3.1.4 Regional Spatial and Economic Strategy (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which outlines the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. The RSES builds on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs).

As indicated in the below map extract, Enniskerry is located within the 'Core Region' which includes the peri-urban hinterlands in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow. It is noted that the Core Region contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations, but a wider catchment area. These include towns such as Bray and Shankill. Such towns also have the capacity for continued commensurate growth to become more self-sustaining.

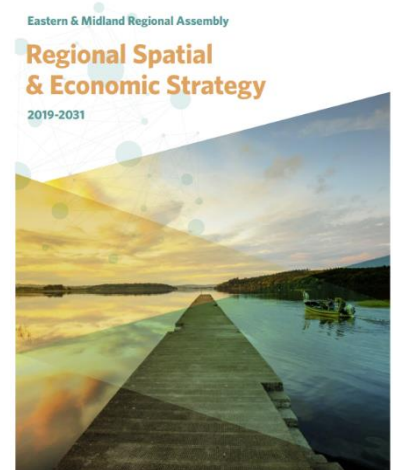


Figure 7.0 Map extract from the RSES indicating the location of Enniskerry within the Core Area

It is highlighted within the RSES that in excess of 550,000 people resided in the Core Region in 2016, it is expected that this figure has subsequently increased. It is also indicated that the Core Region contains some of the youngest and fastest growing towns in the state.

The key growth enablers for the Core Region as per the RSES, include the following:

To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.

Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.

In addition to the above, the following Regional Policy Objectives (RPO's) are considered to be of relevance:

RPO 3.2 *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas*

RPO 4.83 *Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*

The RSES also confirms that local authorities, in developing their core strategies and settlement hierarchies will consider the following growth enablers for every part of the Region to meet its potential including:

Compact Sustainable Growth – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs, and a target of at least 30% for other urban areas.'

With regards to the above, it is considered that appropriately developing the LAP lands will aid in securing the compact and consolidated growth of Enniskerry.

We would also note that facilitating housing is critical to ensuring the sustainability, vitality and viability of our towns and villages. Over the past years, Enniskerry has been subject to the sprawl of one-off housing within and outside of its core area. Support for additional housing and compact growth within this settlement will aid in acting as a viable alternative to urban generated one-off housing, contributing to the principle of compact growth.

The RSES identifies Enniskerry under the category of Self-Sustaining Towns and it is stipulated that such towns are important employment and service centres, and that population growth shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision.

The provision of a sustainable residential development with a net density of 20 dph (as per the density capacity in the current LAP) on the LAP lands is consistent with the above as it will provide housing to accommodate the population increase expected in Enniskerry moving forward and supporting its compact and sequential growth.

As indicated in the map extract below, the town of Enniskerry is also located along the North-South Corridor, with the DART to Bray, making the area accessible via public transport and further unlocking the development potential of the wider area.

The afore referenced public transport enhancements and improvements will have the effect of providing high quality public transport services to Dublin City and other key towns within South Dublin and the Metropolitan Area. The LAP lands are ideally located to benefit from these improvements and are optimally situated, within proximity to existing and planned public transport services, to meet the key objectives of the RSES which includes the promotion of the compact and sustainable growth of Dublin's Key towns including Bray and Enniskerry.

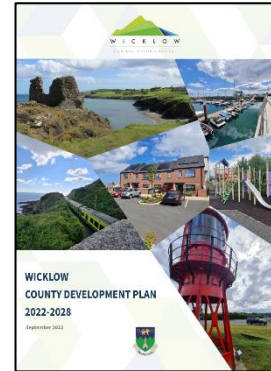
3.2 Local Planning Policy Content

3.2.1 Wicklow Development Plan 2022-2028

The Wicklow Development Plan 2022-2028 was adopted by Elected Members on 12th September 2022, and came into effect on 23rd October 2022.

According to the Wicklow County Development Plan 2022-2028, Enniskerry is a Level 4 Settlement- Self Sustaining Town:

'Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. There is a strong emphasis on aligning population growth with employment growth to make these towns more self-sustaining and capable of accommodating additional growth in the future. Some of these settlements have experienced significant housing growth in recent years and are now in need of catch-up facilities and employment growth. There is potential to pursue further placemaking improvements within the town centres to create a stronger urban structure, deliver improved community and recreation facilities, strengthen the towns' identities and sense of place and provide for a high quality of life. Delivering compact growth, regeneration and revitalisation of the town centres is a key priority. Sustainable mobility should be facilitated and promoted as part of any new development within these settlements. Proposals for regeneration and renewal should be heritage led where possible and informed by healthy placemaking. The towns will aim to become more self-sustaining by concentrating on local enterprise and employment growth and catch-up facilities. This will include attracting investment in a mixture of 'people' and 'product' intensive industries that will generate new employment opportunities and improve the jobs ratio.'



The Core Strategy of the Wicklow Development Plan 2022-2028 identifies Enniskerry as a 'Self-Sustaining Town' with a projected housing demand over the plan period of approximately 36 no. units. Some of the high-level policies included within the Core Strategy which relate to Enniskerry include the following:

- CPO 11.30** *In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy, Rathdrum and Tinahely – Shillelagh - Carnew (south west Wicklow) as tourism hubs.*
- CPO 12.3** *In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow–Rathnew, Arklow, Greystones–Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans.*
- CPO 4.1** *To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self-sustaining growth towns, self-sustaining towns and small towns.*

Towns in Level 4 are generally targeted for growth rates around 20%-25%.

Enniskerry: Heritage led regeneration to deliver compact growth and provide opportunities for shared working space / remote working hub. Enhance the public realm with particular emphasis on improved facilities for pedestrians.

Growth Enablers for the Core Region: To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.

-Commensurate population and employment growth in Key Towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.

-‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.

<p>Small Towns and Villages⁶ (Kilcoole, Newtownmountkenny, Baltinglass, Enniskerry, Rathdrum, Aughrim, Ashford, Carnew, Kilmacanogue, Roundwood, Tinahely, Newcastle, Dunlavin, Avoca, Shillelagh, Donard)</p>	<ul style="list-style-type: none"> Centrally located sites: 30 – 40+ units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes. Edge of Centre Sites: 20-35 dwellings per hectare. Edge of small town / village: Densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.
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Figure 8.0 Table 6.1 of the Wicklow County Development Plan 2022-2028.

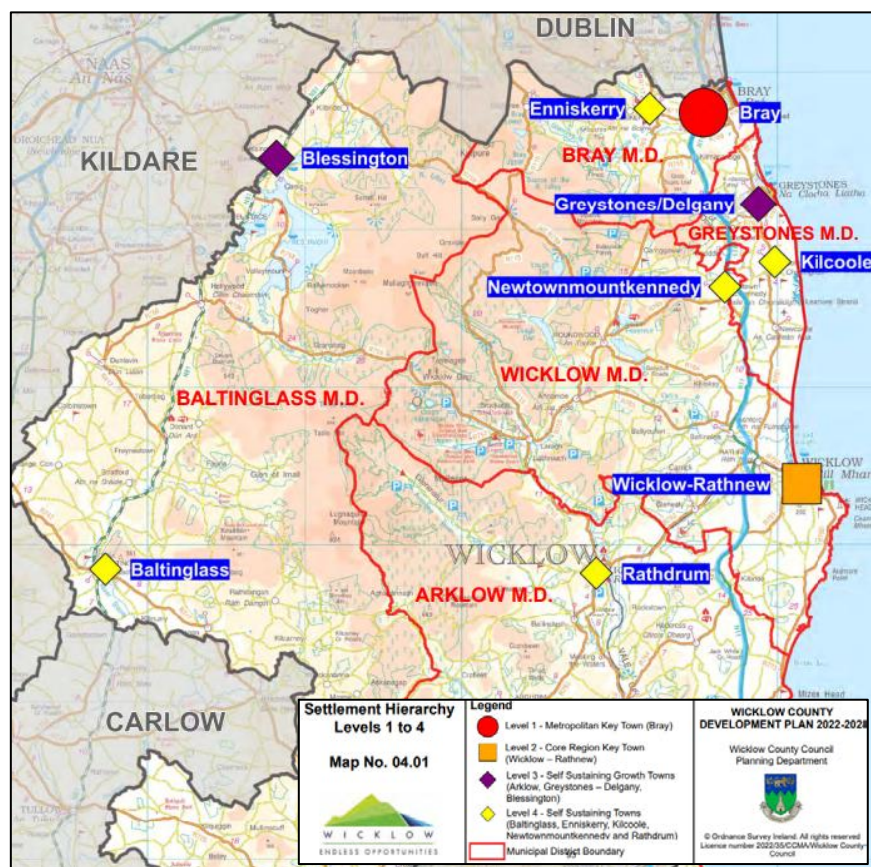


Figure 9.0 Settlement Hierarchy Map from the Wicklow Development Plan 2022-2028, designating Enniskerry as a Level 4- Self- Sustaining Town.

3.2.2 Land Use Zoning in the Bray Municipal District Local Area Plan 2018-2024

Referring to the land-use zoning map included in figure 12.0 below, the LAP lands are zoned 'R20' – *New Residential* in the Bray Municipal District Local Area Plan 2018 as amended in Appendix 11 of the Wicklow Development Plan 2022-2028, the objective associated with which is to '*To protect, provide and improve residential amenities at a density up to 20 units/ha.*'

The vision for the 'R20' zone set out in the Local Area Plan is as follows:

'To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.'

Permitted uses for lands zoned 'R20' are:

Uses generally appropriate for residential zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the CDP.

The Bray Municipal District Local Area Plan 2018-2024 includes a Land Use Map for Enniskerry. The Wicklow County Council website has a page dedicated to the Bray Municipal District Local Area Plan 2018-2024 where it reads:

'NOTE: The Enniskerry Town Plan 2018 - 2024 Land Use Map was amended under the Wicklow County Development Plan 2022 - 2028.'

This note suggests that the Enniskerry Town Plan Land Use Map has been adopted into the Wicklow County Development Plan 2022-2028.

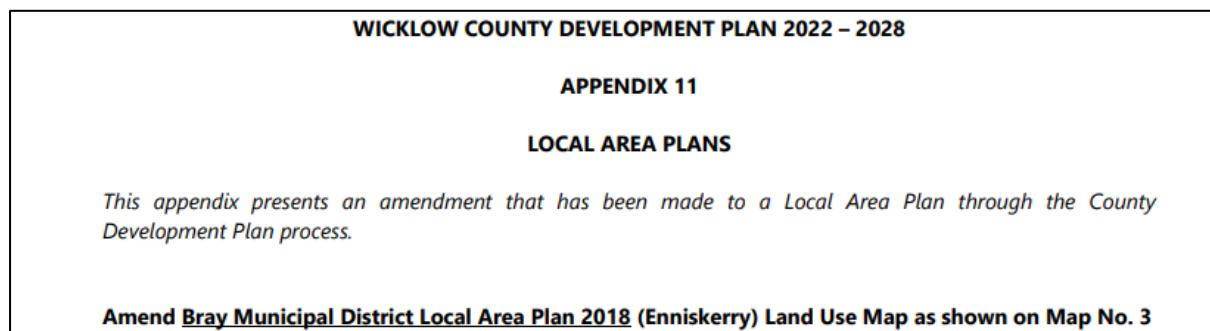


Figure 10.0 Appendix 11 of the Wicklow County Development Plan 2022-2028.

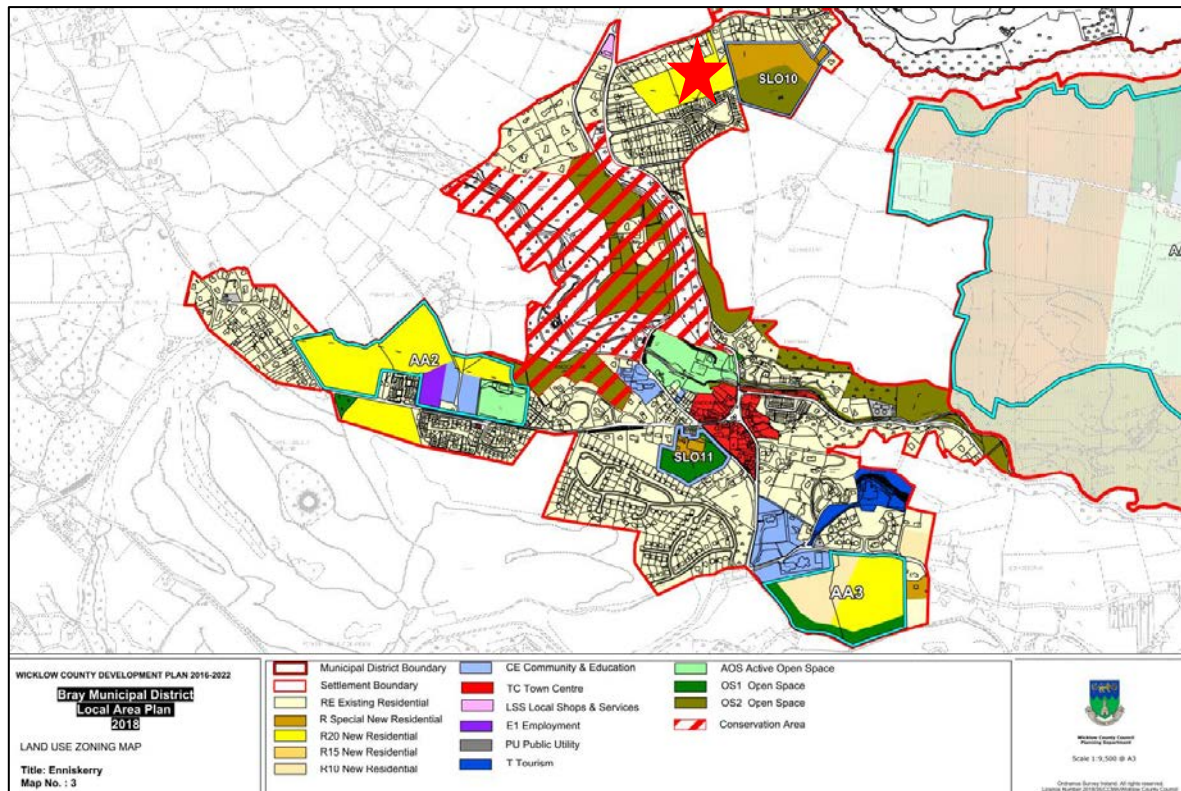


Figure 11.0 The original Enniskerry Land Use Map from the Bray Municipal District Local Area Plan 2018-2024 where the subject site is indicated by a red star.

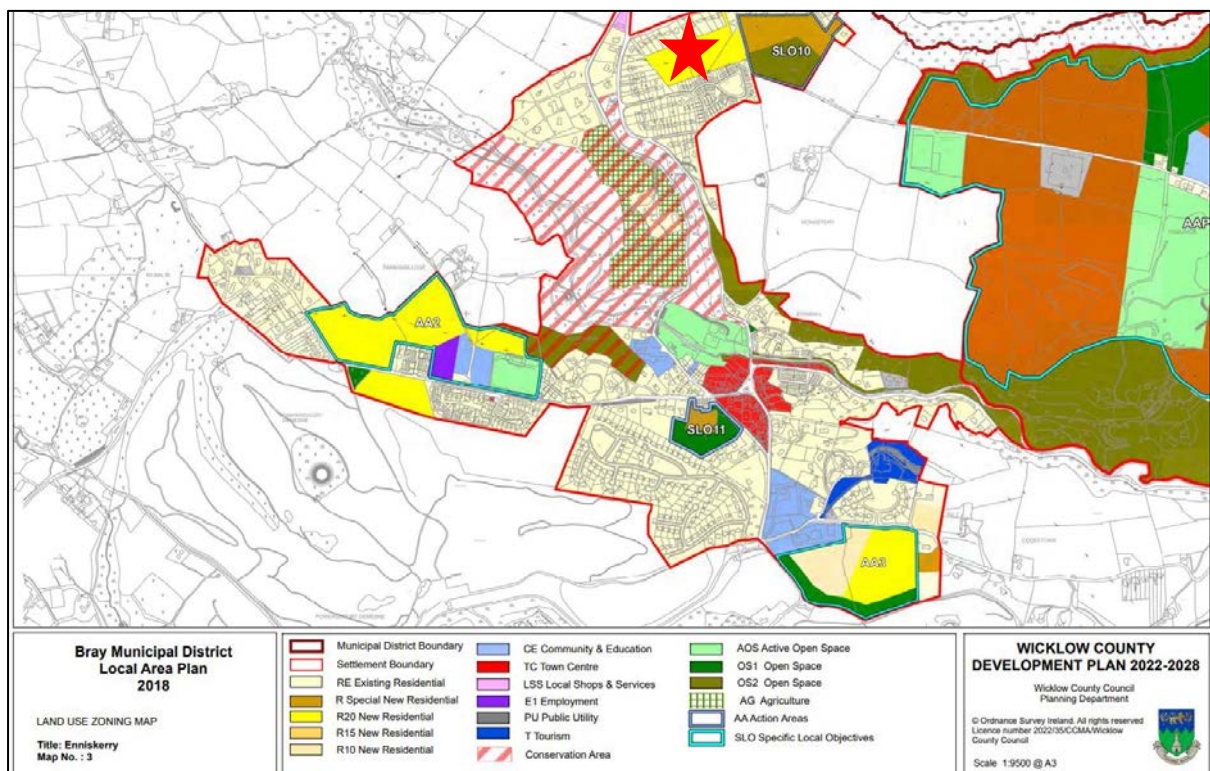


Figure 12.0 The amended Enniskerry Land Use Map, as featured in Appendix 11 of the Wicklow County Development Plan 2022-2028 where the subject site is indicated by as red star.

It should be noted that all of the lands in Figure 12.0 that possess a Residential zoning designation have either commenced or finished development or have received planning permission for residential

development. Thus, the site at the lands at Monastery along Ballyman Road should now be prioritised for residential development.

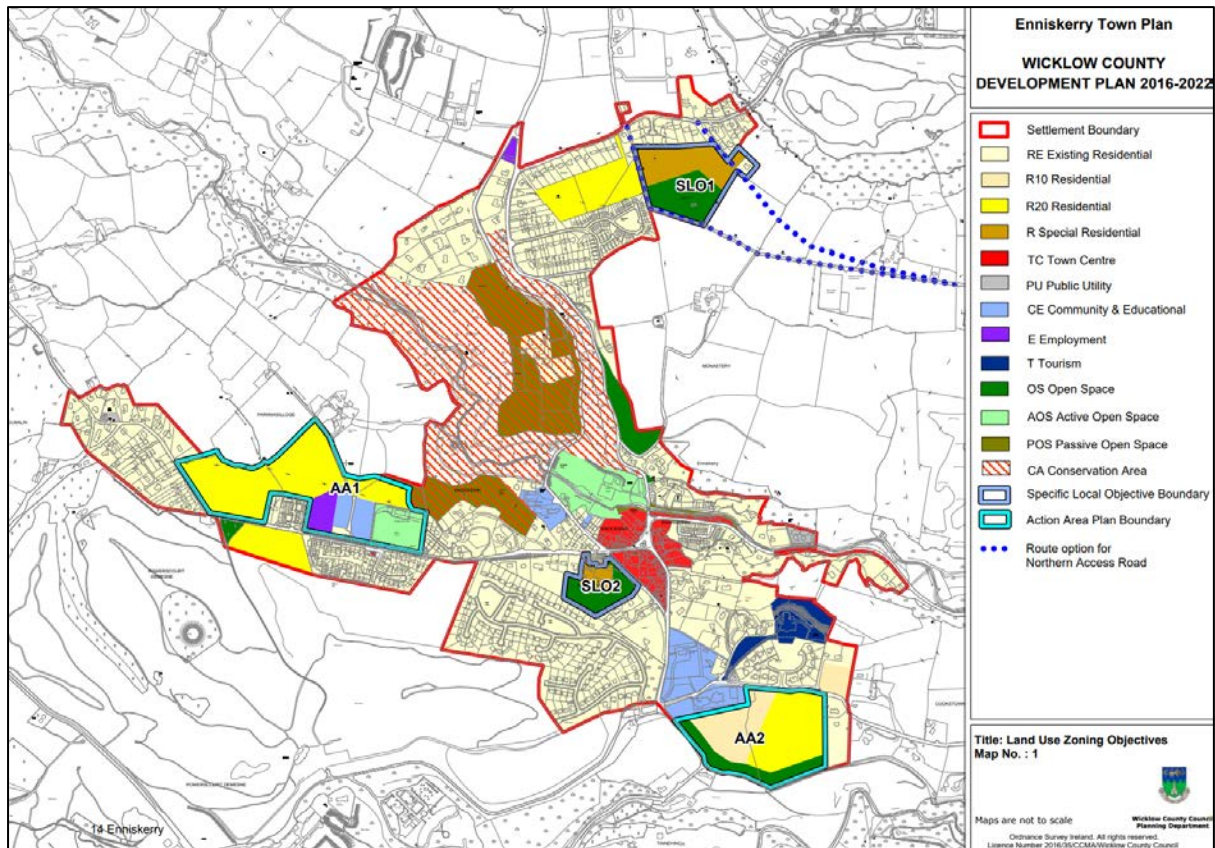


Figure 13.0 The Enniskerry Town Plan within the Wicklow County Development Plan 2019-2022 (previous development plan).

It can be noted that the Enniskerry Land Use Map has remained consistent within the Wicklow County Development Plan 2016-2022, The Bray Municipal District 2018-2024, and the Wicklow County Development Plan 2022-2028. So, the land use designations have remained unchanged for the past 8 years and the Action Areas have yet to be developed. These locations will be prioritised for residential development **before** the subject site.

4.0 Basis of Submission

The content of this submission is generally based on the provision of answers to the Key Issues/Questions considered relevant from the Bray Municipal District LAP Pre-Draft Consultation Booklet, in the context of the future timely delivery of development on the subject lands which is appropriately scaled, and in accordance with the key principles of proper planning and sustainable development. We note the relevant themes as follows:

1. *Housing, Population, and Compact Growth*
2. *Regeneration of Communities and Places; Healthy Placemaking; Urban Design; and Opportunity Sites*
3. *Economic Opportunity; Tourism Shops and Services; and Community Facilities*
4. *Heritage, Biodiversity, Green Infrastructure, Climate Action, and Energy*
5. *Infrastructure, Sustainable Movement, and Transportation*

We fully recognise the importance of community involvement in the preparation of the Bray Municipal District LAP and respectfully acknowledge the purpose of this first stage of the LAP preparation process in terms of stimulating discussion on the broader strategic issues relating to the lands.

5.0 Key Themes

For the purpose of convenience and also to help address the relevant key issues, our submission hereunder follows the general layout of the consultation booklet published by Wicklow County Council and seeks to answer the relevant key questions under each of the principal themes.

5.1 Housing, Population, and Compact Growth

Following an assessment of the population census statistics for Enniskerry. As is depicted in the graphics below, the most populated age groups for the town are those aged 50-59 and 40-49, typically an age group who may be seeking to downsize.

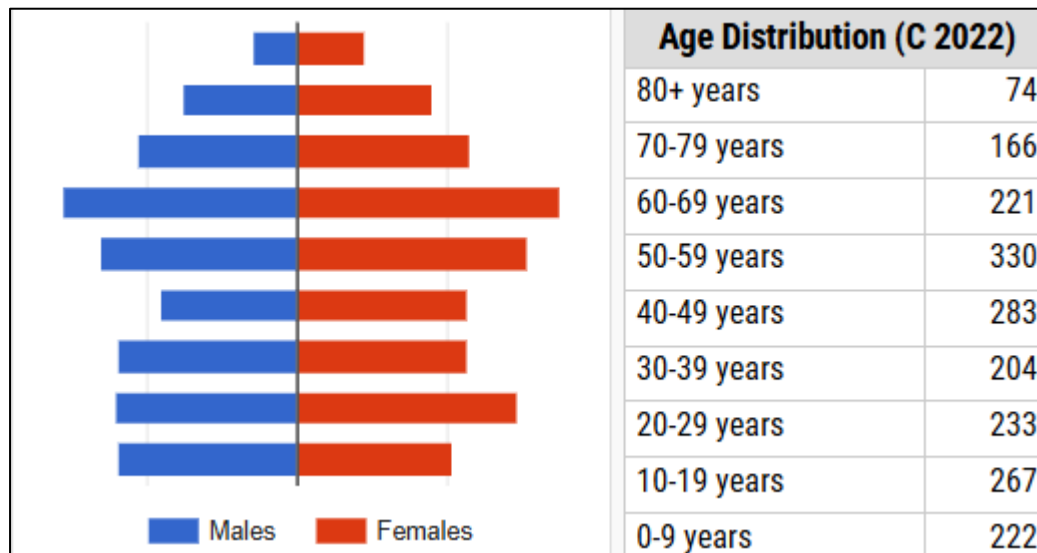


Figure 14.0 Population Structure Enniskerry – Age Distribution

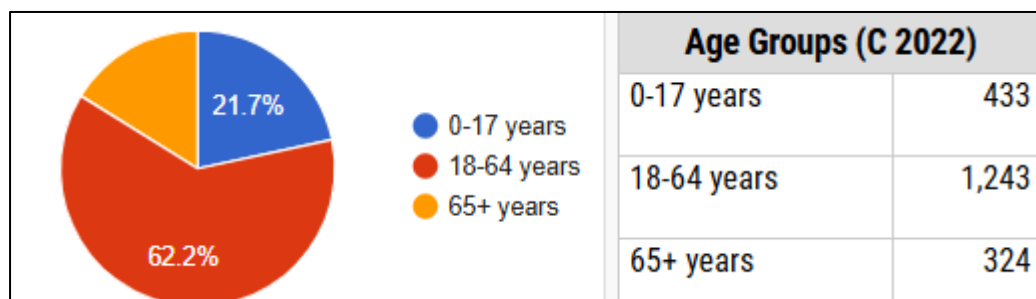


Figure 15.0 Population Structure Enniskerry– Age Groups

Settlement	Population 2016	Population Target Q2 2028
Baltinglass	2,251	2,607
Enniskerry	1,877	2,106
Kilcoole	4,244	4,778
Newtownmountkennedy	3,552	5,179
Rathdrum	1,716	2,339

Figure 16.0 Enniskerry Population Target 2016-2028 (from the Wicklow Development Plan 2022-2028)

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

The growth settlements within the Municipal District will need new homes built between now and 2031.

*The focus of growth will be in Bray, with additional growth in **Enniskerry** and modest growth in Kilmacanogue.*

*To facilitate compact growth, **30% of new homes need to be in the existing built-up area and town/ village centres.** Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet the housing targets set out in the Core Strategy.*

The consultation booklet also includes sample questions for each topic. A suggestion will be provided for the following sample questions:

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

Housing delivery should be prioritised in areas that already have established residential development and the necessary transport infrastructure, such as the site at Monastery along Ballyman Road in Enniskerry. By focusing on these locations can make better use of existing resources and prevent the expansion of urban sprawl into undeveloped or rural areas. This approach not only maximises the efficiency of infrastructure but also supports sustainable growth by encouraging more compact and well-connected settlements. It aligns with broader urban planning objectives aimed at reducing pressure on peripheral zones. Prioritizing housing in these areas ensures that development is more integrated with public services, reducing the need for extensive new infrastructure investments and promoting a more balanced, sustainable urban landscape.

Where are the vacant or underutilised sites in the settlement? How can the plan maximise use of these sites?

The site at Monastery along Ballyman Road is currently underutilised, particularly considering that it is surrounded by established residential developments. By developing this site, the overall utility of the land can be maximised, addressing the need for more housing in a location that is already well-connected and integrated into the local community. Delivering appropriate compact housing on this site would not only make efficient use of valuable land but also provide much-needed residential options. This development would help to meet housing needs while respecting the surrounding environment and existing infrastructure, promoting a more sustainable and cohesive community.

5.1.1 Current Status of Residentially Zoned Lands in Enniskerry

LOCATION/DESCRIPTION	ZONING	POTENTIAL NO. OF UNITS
Action Area Plan 2 - Parknasilloge	R20	156
Action Area Plan 3 - Cookstown	R20	105
SLO 10 - Monastery	R Special	12 max
SLO 11 - Kilgarron	R Special	28
Lands at Monastery Grove	R20	72
Lands at Cookstown	R10	8
Lands at Powerscourt	R20	44
Lands at Cookstown (east of AA3)	R Special	5
Infill on other TC / RE lands		45
TOTAL		475

Figure 17.0 Table 3.2 in the Bray Municipal District Local Area Plan 2018 outlining the sites with a residential zoning designation and their potential capacity.

The following planning applications comprise relevant residential development planning applications that have been granted by Wicklow County Council since 2018 and are in the residentially zoned lands for Enniskerry, as displayed in Figures 12.0 and 17.0.

Action Area 2- Parknasilloge

Reg. Ref. 22794 Permission was granted by Wicklow County Council on 9th September 2022 for 'the construction of development comprising of: enterprise and employment hub including incubator business units/offices and café unit (2,752sqm); community building; childcare facility; 31 residential units comprise: 8 no. 3 bed terraced houses, 5 no. 3 bed semi detached houses, 11 no. 4 bed semi detached houses, 7 no. 5 bed detached houses...'.

On 4th October 2022 the above application was subject to a third-party appeal, ABP Ref. 314763, and is currently awaiting an order from An Bord Pleanála.

Reg. Ref. 22789 Permission was granted by Wicklow County Council on 8th September 2022 for 'construction of a development comprising: - enterprise and employment hub including incubator business units/offices and café unit (2,752sqm) - Community building - Childcare facility - 98 residential units comprise: -8no 2 bed terraced houses -32 no. 3 bed terraced houses - 34 no. 3 bed semi-detached houses - 2 no 3 bed detached bungalows - 8 no. 4 bed semidetached houses - 8 no. 4 bed detached houses - 6 no. 5 bed detached houses...'.

On 4th October 2022 the above application was subject to a third-party appeal, ABP Ref. 314765, and is currently awaiting an order from An Bord Pleanála.

Action Area 3- Cookstown

Reg. Ref. 21830 An extension of appropriate period was granted by Wicklow County Council on 11th August 2021 to 'extend the appropriate period of 14/1704 - construction of 26 no. dwelling units, comprising of 4 no. 2 bed townhouses in a two storey block, 4 no. 5 bed two storey detached units (ranging from 260sqm-268sqm), 9 no. 5 bed two storey detached units (200sqm), 9 no. 3 bed storey detached units (125sqm...'.

Reg. Ref. 211533 Permission was granted by Wicklow County Council on 5th July 2022 for 'the construction of 74 no. dwellings and 10 no. voluntary/sheltered housing dwellings as follows: (A) 74 dwellings comprising 4 no. 2 bedroom 2 storey houses (semi-detached), 26 no. 3 bedroom 2 storey houses (semi-detached), 30 no. 4 bedroom 2 storey houses (semi-detached & detached) & 14 no. 5 bedroom houses (semi-detached & detached); (B) 10 no. single storey 2 bedroom sheltered housing dwellings (semi-detached)...'.

Reg. Ref. SH202102 Permission was granted by An Bord Pleanála on 13th August 2021 for '165 dwellings, open space and creche'.

The development at Cookstown is currently underway.

SLO 10- Monastery

Reg. Ref. 1715 Permission was granted by Wicklow County Council on 16th June 2017 for '12 no detached 5 bed houses with optional garages, approx 280m of a new access road to the site (and adjoining agricultural lands) from Ballyman Road (also forms part of road proposals under separate planning application Reg Ref 16/999), public open space (approximately 1.19 ha) together with ancillary

site development, drainage and landscaping works all on a site of approximately 5.66 ha'

ABP-PL27.248914 Permission was granted by An Bord Pleanála on 18th April 2018 for '2 houses with optional garages, access road from Ballyman Road, public open space and ancillary site works.'

Reg. Ref. 2361 Permission was granted by Wicklow County Council on 21st March 2023 for 'the development consists of minor revisions to previously permitted PRR 17/15 (ABP-PL27.248914), the minor revisions as follows (a) omission of chimneys (b) additional windows at first floor side elevation (c) revision to window on first floor side elevation, these revisions apply to houses 1 - 12 which are located on a 5.66 hectare portion of the permitted development now known as Annabasky Glen, Berryfield Avenue, Enniskerry, Wicklow'

The development has since commenced and is now completed.

SLO 11- Kilgarron

Reg. Ref. 211560 Permission was granted by Wicklow County Council on 8th August 2022 for '1. Demolition of 2 no. dwellings (Oakfield Cottage and dwelling to rear) and 3 no. structures associated with the former equestrian centre; 2. Construction of 22 no. 2 and 3 storey dwellings comprising of 1 no. replacement dwelling at Oakfield Cottage and 21 no. terraced dwellings on lands to the south; 3. The accommodation comprises 4 no. 2 bedroom, 14 no. 3 bedroom and 4 no. 4 bedroom dwellings with a variety of private courtyards, gardens and terraces; 4. Widening of existing entrance on Kilgarron Hill to provide vehicular and pedestrian access via a new internal access road; 5. 40 no. car parking spaces; 6. Public Open space, landscaping, boundary treatments, bin stores and all associated site works and services'

An Appeal for the permission under Reg. Ref. 211560 was lodged on 30th August 2022.

ABP-PL27.314481 Permission was granted by An Bord Pleanála on 12th January 2024 for 'Demolition of 2 dwellings and 3 structures, construction of 22 houses, widening of existing entrance on Kilgarron Hill, 40 car parking spaces, public open space and associated site works and services.'

The development at Kilgarron is currently underway.

Lands at Powerscourt

Reg. Ref. 171300 Permission was granted by Wicklow County Council on 2nd July 2018 for 'for development at a 2.169 ha site (21691 sqm) (within the attendance grounds of a protected structure). The lands are bounded to the north by the L1011, to the south by Powerscourt Golf Club, to the east by Kilgarron Park Housing Development and to the west by tree planted open space lands. The development will consist of 44 no dwellings (22 no two storey 3 bedroom semi detached dwellings, 14 no part two, part three storey four bedroom semi detached dwellings 1 no parttwo part three storey four bedroom detached dwellings and 7 no two storey four bedroom detached dwellings), 93 no ancillary car parking spaces including 5 no mobility impaired parking spaces, a vehicular access into the scheme from the L1011, pedestrian linkages, hard and soft landscaping, lighting, balconies facing east, west and south, boundary treatments, ESB substation, changes in level and all associated site development works above and below ground'

Reg. Ref. 191117 Permission was granted by Wicklow County Council on 6th August 2020 for 'alterations to Reg Ref 17/1300 signage details at site entrances, layouts of

parking, pathways and house entrances associated with units 41 to 47, wall details along the northern and southern boundaries, level of house units 13 and 14 (increased by 0.63m), plans, sections, elevations of house types A, B and C and associated landscaping, site works and ancillary works to facilitate the development'

The development has since commenced and is now completed.

Lands at Cookstown (East of AA3)

Reg. Ref. 19871 Permission was granted by Wicklow County Council on 28th April 2020 for '27 no detached dwellings (1 no single storey 2 bed houses (c102 sqm), 3 no single storey 3 bed houses (118 sqm), 7 no two storey 3 bed houses (c144-175 sqm) 11 no two storey 4 bed houses (c214-267 sqm) and 5 no 2 storey 5 bed houses (c321sqm) all with on curtilage car parking spaces, a public park (c10,351 sqm) and all ancillary and associated site development, landscaping, drainage and boundary works, including new vehicular access from regional road R760'

The development has since commenced and is now completed.

As highlighted above, all of the lands in Enniskerry that had a residential zoning designation in the previous land use map within the Bray Municipal District LAP 2018 (as amended in the Wicklow Development Plan 2022-2028) have either been developed on, are currently under construction, or have received planning permission for residential development. Thus, the site at Monastery along Ballyman Road should be prioritised next for residential development in Enniskerry and therefore should retain its residential zoning designation.

5.2 Regeneration of Communities and Places, Healthy Placemaking, Urban Design, and Opportunity Sites

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*The local area plan will focus on the regeneration of the existing built up areas of Bray, **Enniskerry** and Kilmacanogue in order to achieve more vibrant and sustainable communities. As well as identifying opportunities for development that can give new purpose and function to existing places, sites and buildings, there is a need to address the evolving needs of communities, in response to demographic and lifestyle changes, as well as addressing such issues as over development, decline, etc.*

The local area plan will promote healthy placemaking through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow.

*The **regeneration of vacant sites** has the potential to improve the vitality and viability of the traditional town/village centres and environs.*

It is contended that healthy placemaking through quality urban design should be prioritised in the new Bray Municipal District Local Area Plan 2025. This can be achieved through the development of vacant sites in existing built-up areas to promote consolidation and benefit from the existing presence of infrastructure and amenities in the area.

5.3 Economic Opportunity, Tourism Shops and Services, and Community Facilities

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

*There is a need to ensure that there is **enough land zoned** within the settlement to meet the projected future educational, community, sport and recreational uses, in order to meet needs of the future population.*

While the area is well serviced with schools, community facilities, sport and recreational facilities, the enhancement of these services will be required to accommodate the level of future growth envisaged.

The new Bray Municipal District Local Area Plan 2025 will be in effect for at least six years. Thus, there must be an adequate amount of land zoned for a variety of uses to ensure appropriate development is permitted in the most suitable place for the use. The provision of an adequate quantity of residentially zoned lands are necessary, as the increase of economic facilities, tourist services, and community facilities will inevitably create an increased demand for residential development; especially in Enniskerry where residential development must be considerate of economic growth due to the nature of the small town.

5.4 Heritage, Biodiversity, Green Infrastructure, Climate Action, and Energy

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

The Bray Municipal District area has a rich variety of built and natural heritage. The protection and enhancement of the area's natural and built assets is key to the future development of the settlements in a sustainable manner.

The local area plan has a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town.

The local area plan will promote sustainable settlement and transport-led development strategies, in particular in relation to the location, layout and design of development.

The local area plan will also include an emphasis on reduction in energy demand and greenhouse gas emissions. Management of areas prone to flooding and the coastal zone will also be addressed in the new local area plan.

The consultation booklet also includes sample questions for each topic. A suggestion will be provided for the following sample questions:

How do we continue to develop the area while protecting and enhancing its natural heritage and biodiversity?

When it comes to land use, what are the key actions we can take to reduce the impacts of climate change?

In response to the two questions above, both reducing the impacts of climate change and enhancing natural heritage and biodiversity can be achieved by focusing development in existing built-up areas. This approach helps to limit urban sprawl, which in turn reduces the reliance on private vehicles and lowers carbon emissions. Additionally, it prevents deforestation and the removal of plants, as the land is already developed, thereby preserving the local ecosystem and supporting biodiversity.

The site at Monastery along Ballyman Road is quintessential to achieve these goals as it is located in an established residential area.

5.5 Infrastructure, Sustainable Movement, and Transportation

The consultation booklet outlines the core goals relating to housing, population, and compact growth for the Bray Municipal District. This highlights the following as key ideas:

The provision of adequate infrastructure is critical to facilitate and sustain growth. It is acknowledged that Bray is serviced by a broad range of strategic transport infrastructure including the harbour.

While Enniskerry and Kilmacanogue have limited public transport infrastructure, the continued improvement of the local transportation network including the provision of footpaths, cycle

lanes, traffic management proposals, etc, are important considerations for incorporation into the plan.

As stated above, Enniskerry has limited public transport infrastructure. Whilst this should be approved, new development, especially residential, should be prioritised where there are existing public transport facilities. The lands at Monastery along Ballyman Road are serviced by the 44 bus which runs from Dublin City University to Enniskerry every hour from 7:00AM to 12:00AM, with a bus stop 160m from the site.



Figure 18.0 The proximity of the bus stop serviced by the 44 Dublin Bus to the lands at Monastery along Ballyman Road and the location of the access point shown by a yellow arrow.

The yellow arrow in Figure 18.0 indicates the location in which provision was left by the council in 1985 for the future creation of an access road to the lands, as stated in Part 3, No. 3 of the Wicklow Land Registry (D93KW05002Y). Our client intends to utilise this access route along with the council services for surface water foul, water sewer, and water supply for the proposed development they intend to apply for.

The Greater Dublin Area Transport Studies for Bray and Environs published in November 2021 outlines the proposal that the Luas Green line will be extended from Cherrywood where it currently terminates, to Bray Town Centre, providing a second rail alternative to this town.

While a decision on the final alignment has yet to be made, it is likely to run to Bray DART station via Shankill and the former golf club lands. It will provide a high frequency, high-capacity link between Bray and the key employment areas of Sandyford, Dundrum and Cherrywood, in addition to connecting to the City Centre. It is intended that a portion of the Metroservices commencing in Dublin Airport and Swords will run through to Bray, subject to the final design of the Cherrywood to Bray section accommodating the length of trams involved. Additionally, Luas services will operate between Bray and Broombridge/Finglas, allowing interchange with metro services to Dublin Airport and Swords.

These extensions would make the area more accessible via public transport and further unlock the development potential of the wider area.

6.0 Conclusion

This submission is prepared in response to the publication of the Bray Municipal District Local Area Plan Consultation Booklet published by Wicklow County Council. As significant landowners within Enniskerry, our client, Maeve Magee welcomes the opportunity to participate in this stage of the plan making process and look forward to further engagement and collaboration with Wicklow County Council as the Draft Local Area plan progresses in the coming months. As highlighted from the outset of this submission our clients are very keen to develop their lands and have undertaken significant research with respect to this landbank.

In the earlier sections of this submission, our clients indicate that the emphasis of the Bray Municipal District LAP should be on the provision of much needed high-quality homes, complimented by quality open space, amenity areas, local services and facilities. The lands are strategically located and presently underutilised and provide a unique opportunity to facilitate the appropriate suburban expansion of Enniskerry in the short term. The future development of the LAP lands is fully consistent with the provisions of national and regional policy provisions and has the capacity to accommodate approximately 72 no. new homes at a sustainable density of 20 dwellings per hectare. As previously stated, our client intends to submit a planning application for the provision of residential development on the LAP lands of at Monastery along Ballyman Road and we therefore request retention of the Residential zoning designation for the site in the Enniskerry Land Use Map in the upcoming Bray Municipal District Local Area Plan 2025.

We trust that the recommendations and commentary included within this submission will be considered by the Planning Authority and we look forward to the publication of the Draft LAP in due course.



Kevin Hughes MIPI MRTPI
Director For HPDC Ltd.