



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Westwings Partnership Ltd.
Reference:	BRAYLAP-171506
Submission Made	December 18, 2024 5:27 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please see attached submission in respect of a site at Westwings, Church Road, for which Wicklow County Council Granted planning permission (WCC Ref. 2360305) for Development of 24 no. units on 24/6/24.

In summary it is submitted that ;

1. The zoning of the site should be changed from RE: Existing Residential to RH1: New residential to support development of this site consistent with WCC's permission.
2. The LAP should be consistent with the Compact Settlement Guidelines which seeks higher density development in edge of centre area where RH1: New residential is more appropriate than RE: Existing Residential Development to support infill schemes.
3. The draft LAP provide for flexibility in respect of Development Management Standards, particularly for Public Open Space and Communal Open Space where the Council is seeking medium to high density schemes on smaller infill sites.

File

2192-BrayLAP-WestwingsV1.pdf, 1.13MB

Our Ref: 2192 Westwings Bray LAP

'Bray MD LAP",
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town, A67 FW96
Co. Wicklow.

18th December 2024

Re: Bray Municipal District Local Area Plan 2025 - Pre-Draft Stage Submission by Westwings Partnership Ltd.

Dear Sir/ Madam,

MacCabe Durney Barnes, [REDACTED] has been instructed by our client, Westwings Partnership Ltd., Church Road, Bray., to make this submission in relation the Draft Bray MD Local Area Plan.

Section 1 sets a brief overview of the locational context for our client's site in the Bray urban area and interest in the Draft LAP. Section 2 sets out the key issues we wish to bring to the planning authority's attention as it proceeds to the preparation of the Draft LAP next year.

On 24/6/24 Wicklow County Council Granted planning permission (WCC Ref. 2360305) for Development of 24 no. units (6 no.1 bed, 6 no. 2 bed, 12 no. 3 bed apartments and duplex units), a new vehicular & pedestrian entrance and pedestrian crossings will be provided off Church Road, new boundary treatments, lighting, site drainage works, and communal open space, car parking spaces, bicycle and refuse storage facilities and all ancillary site development works above and below ground at Westwings, Church Road, Bray, Co. Wicklow

This scheme was Appealed to An Bord Pleanála. A decision is due in March 2025 (ABP. Ref.320184-24)

Summary of Key issues:

1. **Proposed RH1 Zoning for Westwings site:** The key focus of this submission is that the zoning of the site should be changed from *RE: Existing Residential* to *RH1: New residential* to support development of this site consistent with WCC's permission.
2. **The LAP should be consistent with the Compact Settlement Guidelines** which seeks higher density development in edge of centre area where *RH1: New residential* is more appropriate than *RE: Existing Residential Development* to support infill schemes.

3. The draft LAP provide for flexibility in respect of Development Management Standards, particularly for Public Open Space and Communal Open Space where the Council is seeking medium to high density schemes on smaller infill sites.

1 LOCATION CONTEXT

The application site consists of a site 0.33 ha. on Church Road to the south of Bray town, Co. Wicklow. The site is c.1.5 km from Bray train station. The site was formally occupied by a two storey detached dwelling known as "Westwings". This was demolished and the site cleared several years ago under a previous planning consent for an infill scheme.

The neighbourhood is a mixture of suburban residential typologies. The site is also immediately adjacent a school to the east, the Marino Community Special School. The school is set back from Church Road with a car park in front of the school building, along Church Road. This car park is situated on land that is higher than school building. The site is level with the school car park and higher than the school building which is immediately adjacent the site. To the rear of the site is a row of two storey houses (Rosslyn Court) which back onto the site.

Access to the site is via Church Road. The land-cover is typical of a brownfield site with a mix of overgrown shrubs and weeds. The western boundary is planted with tall trees including a wide variety of species



Figure 1: General Site location shown in red (Source: Google Earth)



Figure 2: Site location (Source: Wicklow Co Co Planning Application Viewer)

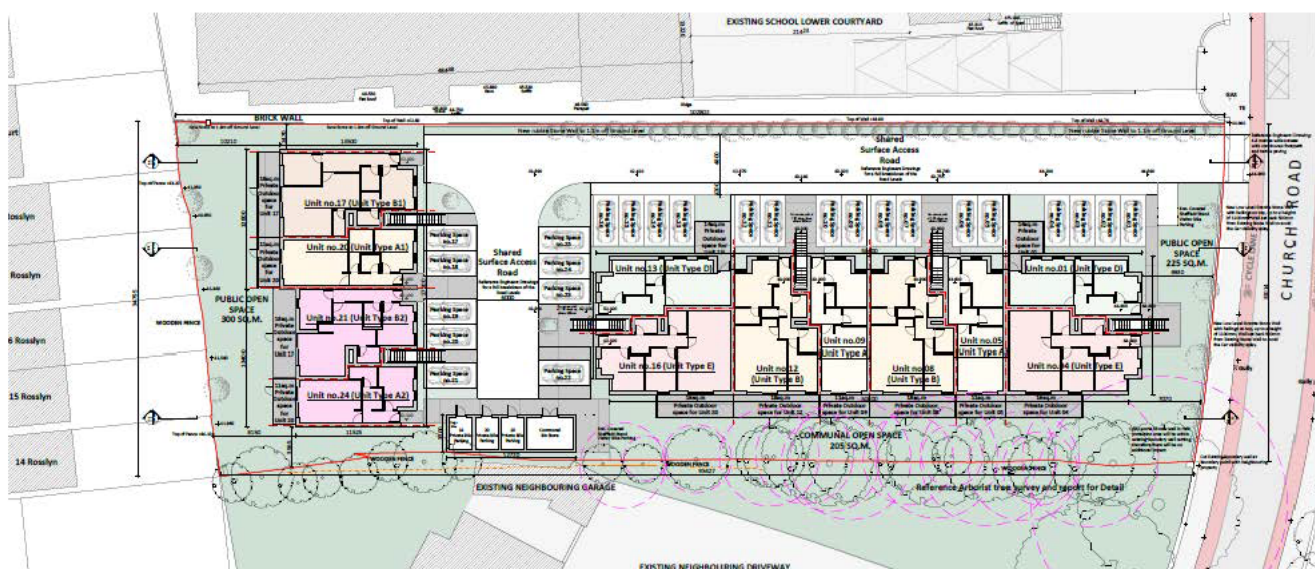


Figure 3 Revised Layout plan for CFI- Permitted Layout (May 2024) (Source: ODKM Architects)



Figure 4 Visualisation of permitted scheme CFI from Church Road Entrance (top) and internal terrace (May 2024) (Source: ODKM Architects)

2 KEY ISSUES

2.1 Proposed RH1 Zoning for Westwings site

The Westwings site was zoned '**RE**'- '**Existing Residential**', in the expired Bray Municipal District Local Area Plan 2018. This zoning is incongruous with the status of the site which is to provide for new infill development and **should be more appropriately zoned 'RH1'**- '**Priority 1 Residential**' in accordance with the Zoning classifications Wicklow County Council is implementing in other recent LAPs in the county.

The permitted scheme provides for a medium density infill scheme on lands zoned Existing Residential. The scheme will bring a brownfield site back into use and increase the supply of housing in Bray town.

Figure 5 below illustrates the 'RE'- 'Existing Residential', in the expired Bray Municipal District Local Area Plan 2018.

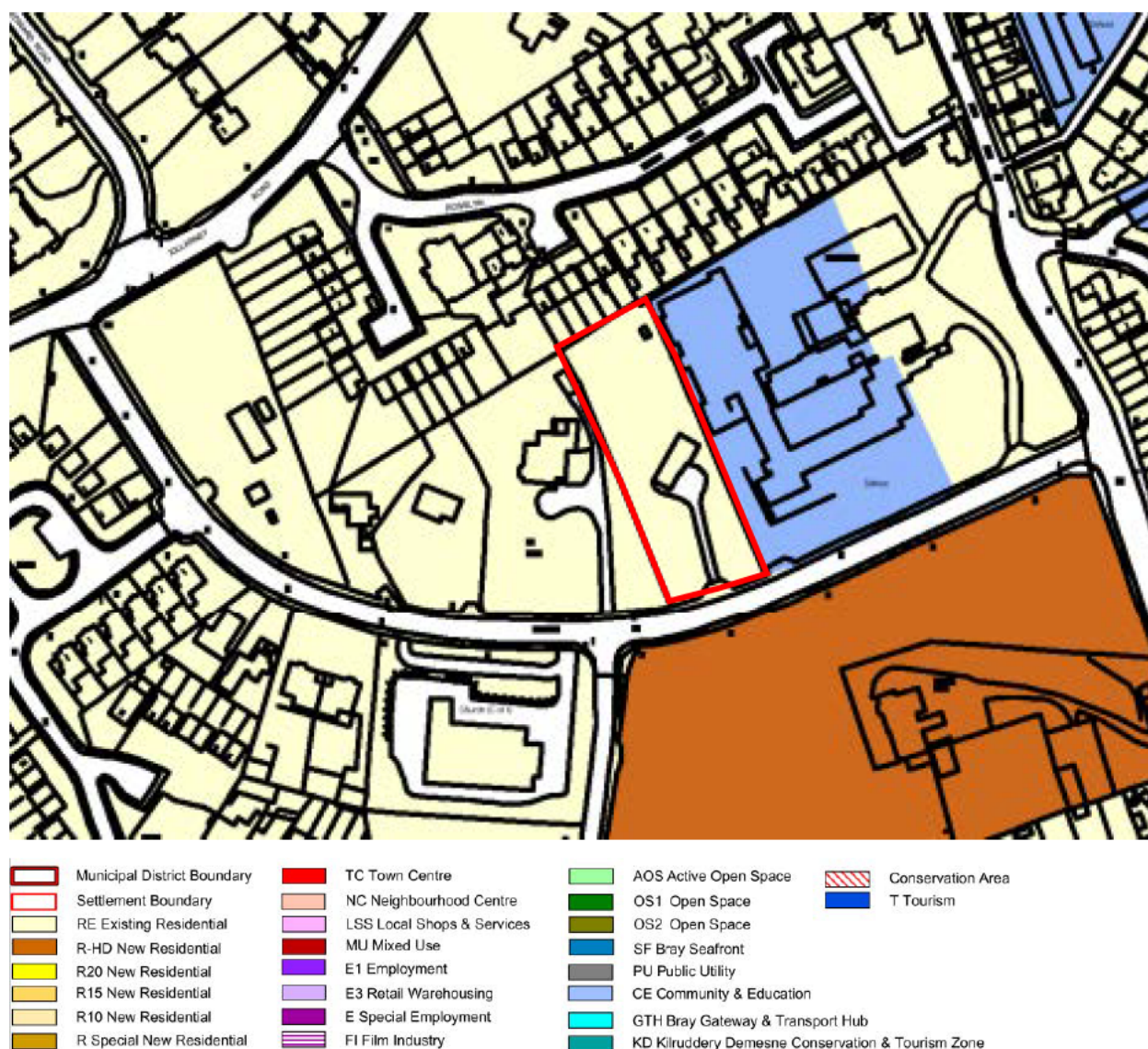


Figure 5 Zoning map context for the subject site (Source: Bray Municipal District Local Area Plan 2018, Map 2)

We have reviewed Wicklow County Council's recently published Draft LAPs for Wicklow Town-Rathnew and Blessington. Consistent with those LAPs, we submit the Westwings site is suitably classified as **RH1**.

We refer to the following text from the Draft Blessington LAP 2025 and consider this can readily be applied to the Westwings site under RH1.

Zoning for residential development

It is an aim of this plan to focus new residential development into the serviced existing built envelope of the settlement. The 'Town Centre' (TC) zone and the 'Existing Residential' (RE) zones all present

significant housing opportunities through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In any development proposal for this area, particular cognisance must be taken of the need to respect the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within the settlement. These central areas may not be sufficient in size and scope to accommodate all of the required long term future housing growth, therefore new 'greenfield' housing development shall also be considered. **'Edge of centre' locations will be considered the priority location for such new greenfield residential development and will generally be zoned as 'New Residential - Priority 1' (zoned RN1) while more 'out of centre' housing sites (zoned 'New Residential - Priority 2' RN2).**

It is submitted that the site should be zoned as follows:

ZONING	OBJECTIVE	DESCRIPTION
RN1: New residential Priority 1	To provide for new residential development and supporting facilities during the lifetime of the plan.	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.

2.2 The LAP should be consistent Compact Settlement Guidelines

Over the course of the assessment of the development application at Westwings, Wicklow County Council sought for the density of the scheme to be increased from 14 to 24 units in line with new Government policy introduced in January 2024. Our submission, is that where it is Council practice to drive higher density standards, local policy should be better aligned with that intend through the LAP.

As part of a clarification of further information (CFI), Westwings Partnership were asked by Wicklow County Council to increase the density of the proposed scheme having regard to the Sustainable Residential Development and Compact Settlement Guidelines (SRDCSG) 2024. We refer to the letter from Wicklow County Council dated 6th February 2024, which stated:

'The site is within Bray which is a within the Dublin metropolitan area. The site is within a Metropolitan Town (>1500 population) – 'centre and urban neighbourhood' area which includes the town centre and immediately surrounding neighbourhoods, where the objective is for residential densities in the range of 50dph to 150dph (net). Then the appropriate density range is to be refined to account for accessibility and to respond to the receiving environment.

*The site is within an ‘accessible’ location, where the density is to be at or above the mid density range which points to a density of c 100dph or over. Allowing for the constraints of putting forward a design that responds positively to the heritage in the area and for the protection of the amenity of the adjoining properties, **the density range could be lowered to within the 50 to 100dph range, however it is considered that a proposal should still aim for the mid of this range**’.* (bold our emphasis)

In effect, the Council sought a density around 75 uph. Table 3.3 of the Guidelines sets out Areas and Density Ranges Areas and Density Ranges – Metropolitan Towns and Villages. It is a policy and objective of the Guidelines that residential densities in the range;

- 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Town
- Range 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Metropolitan Towns, and that densities of up to 100 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations

Policy and Objective 3.1

‘It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate’.

The permitted development at Westwings provides for a Net Residential Density of 73 dph in an urban neighbourhood of a Metropolitan Town, the proposed development is in accordance with the Guidelines.

Wicklow County Council considered this revised density acceptable and granted permission. Our submission is that the zoning objective of the site should be supportive of this status and consistent with the Council’s Decision.

3.The draft LAP should provide for flexibility in respect of Development Management standards

The Council is aware that that no single metric of a scheme can be altered without implications for other parameters such as height, typology, open space and parking. To achieve a medium density of this order, the scheme must also be viable in a market sense. It needs to be feasible in terms of construction cost (without basement or under croft parking) and provide a dwelling typology (price-point) that is attractive to the residential property market in this location.

Medium to higher density development on smaller infill sites means that standards for public and communal open spaces are challenging to achieve. It is submitted the Draft LAP should include specific Development Management objectives that accommodate flexibility in respect of Public Open Space and Communal Open Space standards.

parking and road geometry come are subject to greater refinement and design detail to address multiple (often conflicting) development management criteria. It is submitted that the LAP policy should acknowledge the need to depart from some rigid policy criteria, in order to achieve the density of development the Council is seeking.

In accordance with SPPR3 of the Compact Settlement Guidelines {Minimum Private Open Space Standards for Houses), the draft LAP should clarify that Private Open Space should provided to each unit by means of private terraces or private balconies in accordance with the provisions in Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities) 2022.

We also SPPR 4 Cycle Parking and Storage, which seeks a general minimum standard of 1 cycle storage space per bedroom. It is submitted that it would be helpful for the Draft LAP to accommodate some flexibility in respect of this standard, particularly in scenarios where high cycle space provision is difficult to justify (i.e. Universal Design units).

3 CONCLUSIONS

The 'Pre-Draft' documentation on Wicklow County Council's Consultation Portal outlines high level 'Key Topics' which will be developed in significant further detail as the LAP progresses to the Draft Stage.

The key point of this submission is that the land use of our client's property on Church Road as 'RE' 'Existing Residential' should be more appropriately rezoned as 'RH1' 'New Residential Priority 1' in the new draft LAP. The revised zoning would support the grant planning permission achieved on the site earlier this year.

Our client look forward to further engagement with the Planning Authority as the LAP progresses to the Draft Consultation stage.

We trust all is in order and should you have any queries please do not hesitate to contact this office.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Richard Hamilton', is written over a light blue rectangular background.

Richard Hamilton MIPI MRTPI
Director
MACCABE DURNEY BARNES