



Pre Draft Bray LAP Submission - Report

Who are you:	Agent
Name:	Fortstone Limited
Reference:	BRAYLAP-131136
Submission Made	December 18, 2024 1:15 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please refer to the enclosed submission to the Pre-Draft Bray Local Area Plan 2025, in respect of lands at Parklands Office Park, Southern Cross Road, Bray Co. Wicklow, prepared by Tom Phillips + Associates on behalf of Fortstone Limited.

File

Lands at Parklands Office Park - Submission to Pre-Draft Bray LAP 2025.pdf, 1.42MB

Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Wednesday, 18th December 2024
[Submission via Consultation Portal.]

Dear Sir/Madam,

RE: PRE-DRAFT CONSULTATION BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2025: SUBMISSION IN RESPECT OF LANDS AT PARKLANDS OFFICE PARK, SOUTHERN CROSS ROAD, BRAY, CO. WICKLOW.

1.0 INTRODUCTION

Tom Phillips + Associates¹ have been retained by Fortstone Limited² to prepare this submission to the *Pre-Draft Consultation for the Bray Municipal District Local Area Plan 2025*, in respect of lands at Parklands Office Park, Southern Cross Road, Bray, Co. Wicklow.

This submission has been made before the consultation period closes on Wednesday, 18th December 2024.

Our Client is the owner of Parklands Office Park, Southern Cross Road, Bray, Co. Wicklow. The site is located within the Local Area Plan boundary, within the southern portion of the 'Bray Town and Environs' area.

1.1 Executive Summary

This submission has regards to the recently published *Bray Municipal District Local Area Plan 2025 Pre-Draft Booklet*, which outlines the need for additional residential development within the Bray Municipal District between now and 2031. The Pre-Draft Booklet identifies that 30% of new homes need to be in the existing built up area and town/village centres, to facilitate compact growth.

This need for additional housing in Bray is reflected in the relevant national, regional, and local planning policy. These policies and guidelines, as outlined in this submission, also highlight that an emphasis should be placed on the development of new housing within the built-up footprint of existing towns and cities, through compact growth. They also highlight the importance of the provision of infill development and regeneration of underutilised sites.

¹ 80 Harcourt Street, Dublin 2, D02 F449.

² 17 Parklands Office Park, Southern Cross Road, Bray, Co. Wicklow, A98 WA24.

Our assessment of the lands identified for new residential development in the *Bray Municipal District Local Area Plan 2018-2024* (2018 LAP), shows that the vast majority of these lands were not brought forward for development over the lifetime of the plan, with only a small number having sought planning permission for redevelopment during this period. We highlight that the majority of lands zoned for new residential development in the settlement of Bray was located within Fassaroe, with Policies in the 2018 LAP noting that major infrastructure provisions and upgrades are required to unlock the development potential of these lands. To date, these infrastructure interventions do not appear to be in place. We further highlight that no surplus of land was zoned for residential development in this LAP, therefore, all zoned lands would need to be redeveloped during the life of the Plan to ensure the housing targets contained therein are met.

We contend that the housing targets for the 2018 LAP are unlikely to have been met, based upon a planning history search of the relevant sites, and, therefore, the new LAP will have to account for this when determining the new housing targets for the forthcoming *Draft Bray Municipal District Local Area Plan 2025* (the Draft LAP). We, therefore, contend that additional land will be required to be zoned for new residential development as part of the forthcoming Draft LAP, to account for the potential deficit carried over from the 2018 LAP period.

Our Client's site is located within the existing built-up area of Bray, with high quality public transport and social infrastructure in-situ. The area immediately surrounding the subject site is undergoing a period of change, with a large scale residential development bounding the subject site to the south-west nearing completion. Our Client's site features a large quantum of undeveloped land and we contend that the provision of residential accommodation in this location would be appropriate, and would form a natural extension to the new neighbouring residential development.

2.0

2.1 SITE CONTEXT

Subject Site and Urban Context

The subject site measures c. 2.1Ha and comprises a 2 storey office building, with surface car parking, and ample undeveloped greenspace. The office building is located within the north-east corner of the subject, surrounded to the south, west and south-west by undeveloped land. While the western corner of the site features landscaped green areas, the remaining 'green' areas of the site are vacant, undeveloped land. The subject site is located on a prominent corner site, bound by the Southern Cross Road to the north, and R761 to the east.



Figure 2.1: Aerial view of the subject site (represented by indicative red-line boundary). (Source: Google Earth, as annotated by Tom Phillips + Associates, 2024.)

The site is bound to the south-west by a new 125 no. unit residential development, Foggie Field, which is nearing completion of development by Glenveagh. Beyond this new residential development, to the south-west is the large landholding of Kilruddery House and Gardens. Bray Golf Club is located to the east of the subject site. The Wilton Hotel and Woodlands Office Park are located north of the subject site.



Figure 2.2: Location of the subject site (indicated by red star) in the context of the existing built-up area of Bray. (Source: Google Earth, as annotated by Tom Phillips + Associates, 2024.)

The area surrounding the subject site is primarily characterised by residential development, though a range of other uses such as leisure, enterprise, tourism, and light industrial are also evident. The established residential nature of the surrounding area means that the full range of social infrastructure required for new residential development is already in-situ. A large Supervalu is located on Southern Cross Road, with an Aldi located on Boghall Road, both of which are located within walking distance. Kilruddery House and Gardens hosts a range of cafes and restaurants, a farm shop, and weekly market.

A medical centre and pharmacy are located further west along Southern Cross Road. Vevay Dental Centre is located along the R768. A wide range of other health services are available within Bray Town, including Bray Primary Care Centre.

Shoreline Leisure is located on Southern Cross Road, which features a swimming pool, gym, astro pitches. A skatepark and playground are located adjacent to Shoreline Leisure. Bray Golf Club is located immediately east of the subject site, on the opposite side of the R761. Bray Lawn Tennis Club is located along the R761. The Bray Head Loop Walk runs adjacent to the eastern boundary of the subject site. There are a number of other hikes and walks located nearby, including the Bray-to-Greystones walk (currently closed), the Great Sugar Loaf, and the Little Sugar Loaf, among others. Kilruddery House features beautifully landscaped gardens, however, there is an admission fee for non-members.

Childcare facilities within close proximity to the subject site include Naíonra Bray, Park Academy Nature Kindergarten, CleverBears Preschool, Belmont Montessori, and Safari Childcare Bray. Primary schools within close proximity to the subject site include Scoil Chualann, St. Fergal's National School, Bray School Project NS, and St. Andrew's National School. Secondary Schools in close proximity to the subject site include Presentation College Bray, Loreto Bray, and St. Killian's Community School. Newcourt School, which caters for people with additional educational requirements, is also located within close proximity to the subject site. Bray Institute of Further Education is located within Bray Town, providing a range of full-time, part-time, and evening courses. The subject site benefits from good public transport linkages, providing access to Third Level providers outside of Bray and Wicklow.

The site is served by a number of bus routes, which have stops along Southern Cross Road (which features a bus lane) and the R761. These routes include the Nos. 84X, 143, 144, 184, and Aircoach 702. The No. 84X operates every 10minutes during peak times Monday to Friday, providing connections from the site to Newcastle and Greystones to the south, and towards Cherrywood, University College Dublin, Donnybrook, and Dublin City Centre to the north. The Nos. 143 and 144 provide alternate routes depending on the time of the day, with the No. 143 operating at half hourly frequency during peak times from the terminus at Southern Cross Road, serving Bray Town and Train Station, Loughlinstown Hospital, Cherrywood, and Leopardstown, among others. The No. 144 operates during off peak hours, with half hourly frequency, from Southern Cross Road towards Bray Town and Train Station. The No. 184 operates every half hour in each direction, providing access southbound towards Greystones and Newcastle, and northbound towards Bray Town and Train Station. The Aircoach 702 route provides an hourly service to and from Dublin Airport.

Bray Train Station is easily accessible from the subject site, either by bus, as outlined above, by bicycle (c. 13-minutes), or by car (c. 10-minutes). Bray Train Station is served by both the DART, Dublin-Dundalk Commuter, and Dublin Connolly-Rosslare services. The DART operates every 5-10minutes during peak times and provides ease of access towards Dublin City Centre and beyond.

The subject site is also served by a good quality road network, with the Southern Cross Road linking to the N11 and M11, which themselves connect into the M50, providing access to the wider motorway network.

2.2 Planning History

A Planning History search was conducted in respect of the subject site, utilising the Wicklow County Council Planning Application Map.

A total of 12 no. valid Planning Applications have been lodged in respect of the subject site. Applications Reg. Ref. 04/1769, 05/4358, 06/6823, and 16/837 were deemed withdrawn.

The existing office park was originally granted permission under Application Reg. Ref. 02/7315. This Application was subsequently amended under Application Reg. Refs. 07/1765, 09/721, and 12/6778. An Extension of Duration was granted under Application Reg. Ref. 12/6518. A Change of Use was granted under Application Reg. Ref. 20/93, from office use to pilates studio and physiotherapy use.

A full breakdown of the valid Planning Applications not deemed Withdrawn, in respect of the subject site, is set out in Appendix A of this Submission.

As evident in the planning history, our Client, Jarlath Sweeney, has owned the subject site and developed the existing business park.

3.0 NATIONAL AND REGIONAL POLICY GUIDANCE

3.1 Project Ireland 2040: National Planning Framework

The *National Planning Framework* (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

Some of the key National Policy Objective's (NPO) included in the NPF in terms of the need for additional housing are as follows:

NPO 3a: *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."*

NPO 3b: *"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."*

NPO 3c: *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints."*

We can see these national policies reflected in the overarching aims of the Pre-Draft Booklet for the forthcoming *Bray Municipal District Local Area Plan 2025*, which is outlined in further detail in Section 4.0 below.

3.2 Sustainable Residential Development and Compact Settlement Guidelines (2024)

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) were published in January 2024 and sets the national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Bray is considered a metropolitan key town, therefore the following provisions apply:

Section 3.3.1

“The key priorities for city and metropolitan growth in order of priority are to:

- (a) **strengthen city, town and village centres,***
- (b) **protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,***
- (c) **realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development,***
- (d) **deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,***
- (e) **deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport, and***
- (f) **deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the city and suburbs area or a metropolitan town.”***
[Our Emphasis.]

Table 3.3

“Metropolitan Towns (>1,500 population) – Suburban / Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the 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 (as defined in Table 3.8).”

It is evident from the provisions above that the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) place a significant emphasis on Metropolitan Key Towns, such as Bray, and the role they play in the delivery of new housing. These Guidelines highlight the opportunity for delivery of new housing through infill development, particularly within the existing footprint of built-up areas.

3.3 Regional Spatial Economic Strategy: Eastern and Midlands Regional Assembly 2019-2031

The purpose of the *Regional Spatial Economic Strategy* (RSES) is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Regions.

The RSES describes Bray as forming part of the wider Dublin Metropolitan Area:

“The wider Dublin Metropolitan Area (DMA) metropolitan area, home to 1.4 million people in 2016, covers the continuous built up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, Bray and Greystones, which have strong connections with the city.”

Bray is listed as a Metropolitan area Key Town within the settlement hierarchy. Key Towns are described as follows within the RSES:

“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.”

Metropolitan Key Towns are described as follows:

*“Metropolitan Key Towns are large economically active service towns located **within the Dublin Metropolitan Area**, with **high quality transport links and capacity for increased residential and employment densities** at strategic transport nodes.”* [Our Emphasis.]

The RSES highlights the importance of Bray as a Metropolitan Key Town:

*“Bray is the largest town in County Wicklow, with a population of 32,600 in 2016, and strategically located at the eastern gateway to the County, with **access to the N/M11 corridor (including M50), DART/rail line and quality bus service**. It is a **strong active town that provides higher order services**, including tertiary education, health, cultural and leisure facilities and is a major retail and shopping destination, attracting people from the surrounding towns and villages. While many residents commute to Dublin, there is potential to provide for significant local employment growth for both its residents and its extensive surrounding catchment. Bray is a visitor and tourism destination benefitting from its natural setting on the coast with the backdrop of the Wicklow Mountains.”* [Our Emphasis.]

Regional Policy Objective 4.37 specifically relates to the continued development of Bray:

Regional Policy Objective 4.37

*“**Support the continued development of Bray** including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.”* [Our Emphasis.]

In accordance with National Planning Objective 68 (from the *National Planning Framework*), the Regional Assembly in July 2020 approved the ‘transfer’ of population growth of 13,000 from the city to the metropolitan area settlement of Bray, of which 9,500 would be to that part of Bray located in Co. Wicklow.

Further to the Sections above, the RSES further highlights the importance of Bray as a key location for the future delivery of housing, and this is cemented by the ‘transfer’ of additional housing targets to this settlement in 2020. The RSES highlights the existing social and transport infrastructure in-situ within Bray, which makes it a location capable of accommodating additional population growth.

3.4 Wicklow County Development Plan 2022-2028

The *Wicklow County Development Plan 2022-2028* (referred to as the Development Plan herein) was adopted on 12th September 2022. The Development Plan sets out the overall strategy for the proper planning and sustainable development of the County for the plan period and beyond.

The population targets for Wicklow County, as set out in the Development Plan, are underpinned by the *National Planning Framework* (and associated Roadmap), *Regional Spatial Economic Strategy*, and data from the Central Statistics Office.

These population targets include a total growth for the County between 2016 to 2031 of c. 27,575 – 31,075 persons (incl. MASP allocation). Of this, a minimum of c. 9,500 persons should be located in Bray.

	2016	2026	2031	Total growth 2016-2031
County Wicklow	142,425	155,000 - 157,500	160,500 – 164,000	18,075 – 21,575
plus 25% headroom (2026 only)		158,144 – 161,269		
plus MASP allocation (2031)			170,000 – 173,500	27,575 – 31,075
of which Bray (min)				9,500

Figure 3.1: Extract from Table 3.1: Population targets for Co. Wicklow 2026, 2031, as set out in the *Wicklow County Development Plan 2022-2028*.

The housing completions and targets for Wicklow County between 2017 to Q4 2031 are shown in Figure 3.2 below. These represent an anticipated total housing demand of 14,949 new homes to be built during this period.

County Wicklow	Units delivered 2017-2020	Estimated completions Q1 2021 - Q2 2022	Target Q3 2022 - Q2 2028	Target Q3 2028 – Q4 2031	Total
New housing demand	3,230	1,404	8,467	1,848	14,949

Figure 3.2: Extract from table 3.2: Housing completions and targets for Co. Wicklow 2020, 2022, 2028, 2031, as set out in the *Wicklow County Development Plan 2022-2028*.

The Development Plan includes a Settlement Hierarchy for Wicklow County, which lists Bray as the only Level 1 settlement. This Settlement Hierarchy is based upon the *Regional Spatial Economic Strategy for the Eastern and Midlands Region*.

The Development Plan notes the following with regard to the capacity of Level 1 settlements:

“Key Towns are identified for growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth.”

Figure 3.3 below, as extracted from the Development Plan shows that 29,646 persons, c. 21% of the Wicklow County population lived within the settlement of Bray in 2016. There is a target population of 38,565 persons, c. 23% of the County population, for the Bray Settlement in Q2 2028. This shows a target to increase the percentage of the County population living within this settlement. The targets shown below also represent a targeted c. 30% population growth in Bray during this period, compared to a c. 19% total population growth for the County.

Level	Settlement	Population 2016	Population target Q2 2028
1	Bray	29,646	38,565
	Total	142,425	169,658

Figure 3.3: Extract from Table 3.4: Wicklow Settlement / Aggregate Settlement Population Targets 2016, Q2 2028, as set out in the Wicklow County Development Plan 2022-2028.

Table 3.5 in the Development Plan shows the targetted housing growth within the County to 2031. It shows an anticipated total housing growth of c. 14,949 no. new units within the County between 2016 – 2031, of which c. 5,062 no. units are targetted to be located within the settlement of Bray. This equates to c. 34% of the total targetted new units for the County during this period.

This targetted housing growth will result in a total housing stock in Bray of c. 16,294 no. units in 2031, which is a c. 45% increase compared to the 2016 housing stock. The total targetted housing stock in Bray in 2031 will represent c. 23% of the total housing stock in the County (c. 69,935 no. units). This is an increase on the c. 20% of housing stock in the County which was located in Bray in 2016.

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
1	Bray	11,232	165	100	4,026	771	5,062
	Total	54,986	3,230	1,404	8,467	1,848	14,949

Figure 3.4: Extract from Table 3.5: Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031, as set out in the Wicklow County Development Plan 2022-2028.

Section 4.2 of the Development Plan highlights the geographical constraints to the future development of Bray. It highlights that to meet their housing targets, a new development centre has been planned at Fassaroe, located west of the M11/N11, however, new and upgraded infrastructure is required to unlock the development potential of these lands:

Section 4.2:

“Further expansion of the settlement is severely constrained on all sides by the administrative boundary of Dun Laoghaire-Rathdown and the coast to the north and east, Bray Head / Sugarloaf Mountains to the south and the N/M11 to the west. In order for Bray to fulfil its growth potential, lands at Fassaroe to the west of the N/M11 are targeted for new housing and other facilities. The development of a new centre at Fassaroe is largely dependent on the delivery of infrastructure including upgrades to the N/M11 and the delivery of high quality public transport connections to Bray Town Centre and to Dublin City Centre.”

The Development Plan outlines a range of Policies and Objectives which support compact growth and the provision of infill development within the built-up areas of the County.

County Policy Objective 4.2

*"To secure **compact growth** through the delivery of **at least 30% of all new homes within the built-up footprint of existing settlements** by prioritising development on infill, brownfield and regeneration sites and redeveloping **underutilised land** in preference to greenfield sites."* [Our Emphasis.]

County Policy Objective 4.3

*"Increase the density in existing settlements through a range of measures including bringing vacant properties back into use, reusing existing buildings, **infill development schemes, brownfield regeneration**, increased building height where appropriate, encouraging living over the shop and securing higher densities for new development."* [Our Emphasis.]

County Policy Objective 4.9

*"To target the reversal of town and village centre decline through **sustainable compact growth** and targeted measures that address vacancy, dereliction and **underutilised lands** and deliver sustainable renewal and regeneration outcomes."* [Our Emphasis.]

Section 5.4.1

*"Investment in regeneration, renewal, public realm improvements, amenity projects and placemaking actions is essential to transform the capacity and harness the potential of our towns and villages. There are many **sites and buildings** throughout the County that are **underutilised**. The **potential of these assets needs to be harnessed**."* [Our Emphasis.]

Section 5.6: Town and Village Regeneration and Rejuvenation Priorities - Bray

*"There will be a **strong focus on** addressing dereliction and **underutilised sites** and delivering placemaking that will strengthen the town's image and sense of place."* [Our Emphasis.]

It is evident from the extracts above that the Development Plan acknowledges the need for additional housing within the County, of which, an increased percentage should be located in Bray, the only Level 1 Settlement in the County. The Development Plan highlights that this future additional housing provision should be focused on the existing built-up areas, through compact growth. Due in part to the geographical barriers to development at this location, the Development Plan further highlights that infill development, brownfield development, and the regeneration of underutilised sites, will be encouraged to meet the housing needs within existing built up areas.

Whilst a large quantum of land has been zoned for residential development in Fassaroe, we highlight that this area is distinct from the existing built-up area of Bray, which are split by the M11/N11, which has limited vehicular and pedestrian crossings. The Development Plan outlines a number of new and upgraded infrastructure, particularly relating to traffic and transport.

The subject site presents an opportunity for compact growth at an underutilised site within the existing built-up area of Bray.

4.0 BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2025 PRE-DRAFT CONSULTATION

The Pre-Draft Public Consultation period for the *Bray Municipal District Local Area Plan 2025* (referred to as the 2025 LAP herein) commenced on 20th November 2024.

The 'Pre-Draft Consultation Booklet' for the 2025 LAP set out 5 no. key topics for the preparation of the forthcoming Local Area Plan. There include 'Housing – Population – Compact Growth' and 'Regeneration of Communities and Places – Healthy Placemaking – Urban Design – Opportunity Sites'.

Housing – Population – Compact Growth

*"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. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment."* [Our Emphasis.]

Regeneration of Communities and Places – Healthy Placemaking – Urban Design – Opportunity Sites

*"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 overdevelopment, decline, etc. The local area plan will promote healthy place-making through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow."* [Our Emphasis.]

It is evident from this 'Pre-Draft Consultation Booklet' that in line with the national and regional Policies and Objectives outlines above, additional housing will be required in the Bray region over the course of the new LAP period, of which, there is an emphasis placed on the provision of infill development and compact growth within the built-up footprint of the town.

5.0 BRAY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018-2024

The *Bray Municipal District Local Area Plan 2018-2024* (referred to as the 2018 LAP herein) was adopted on 14th May 2018 and is the requisite plan for the area until the forthcoming *Bray Municipal District Local Area Plan 2025* is adopted.

5.1 Land Use Zoning

The subject site is currently zoned 'E1 – Employment' within the 2018 LAP, which has the following objective:

“To provide for the development of enterprise and employment.”

This Land Use Zoning Objective is further described as follows:

“To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment.”

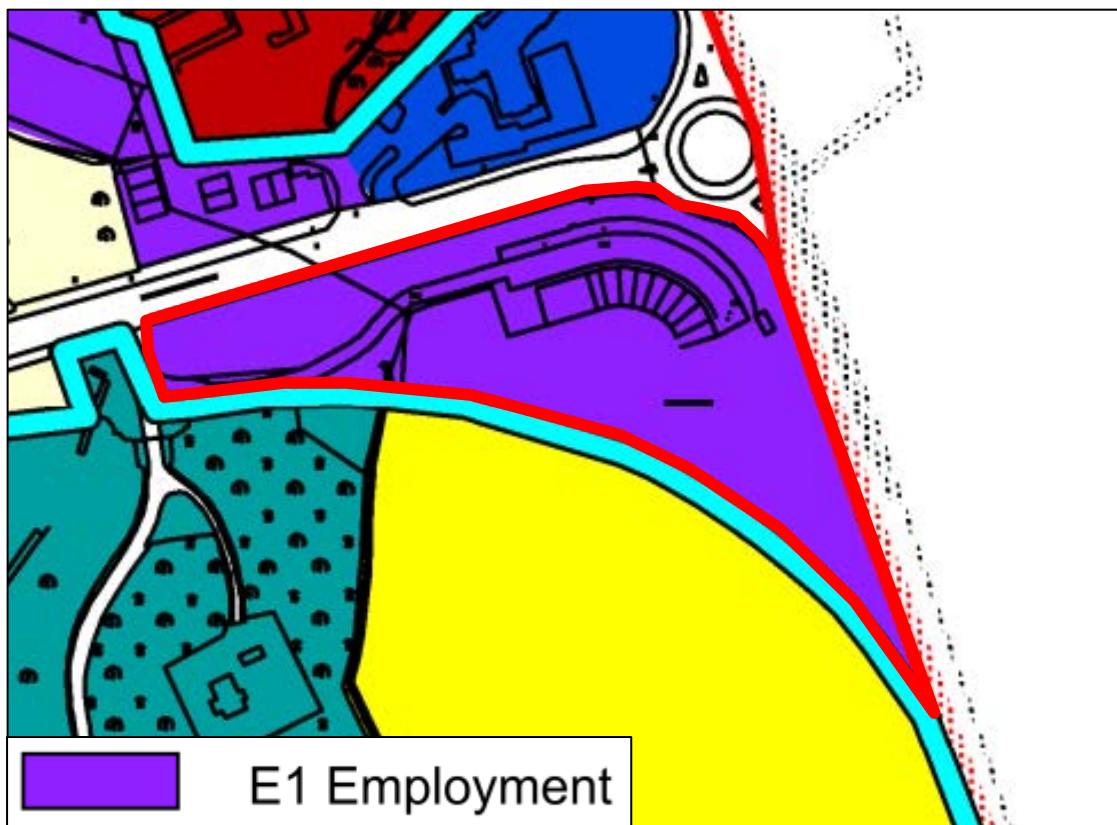


Figure 5.1: Extract from the 'Bray Municipal District Local Area Plan 2018 - Land Use Zoning Map' showing the subject site (represented by indicative red-line boundary) zoned 'E1 – Employment'.

Chapter 11 of the 2018 LAP provides the following uses as being generally appropriate for lands zoned for employment:

“Uses generally appropriate for employment zoned land include general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations and ancillary developments for employment and industry uses in accordance with the CDP.”

We highlight that residential use is not one of the listed 'generally appropriate uses' for this Land Use Zoning.

5.2 Employment Zoned Land

Within the Bray Municipal District, the 2018 LAP zoned c. 76.87Ha of land for employment use³, of which c. 75.86Ha is located within the settlement of Bray (c. 57.58Ha of which is located within the existing built-up footprint of Bray, located east of the M11/N11), as shown in Figure 5.2 below.

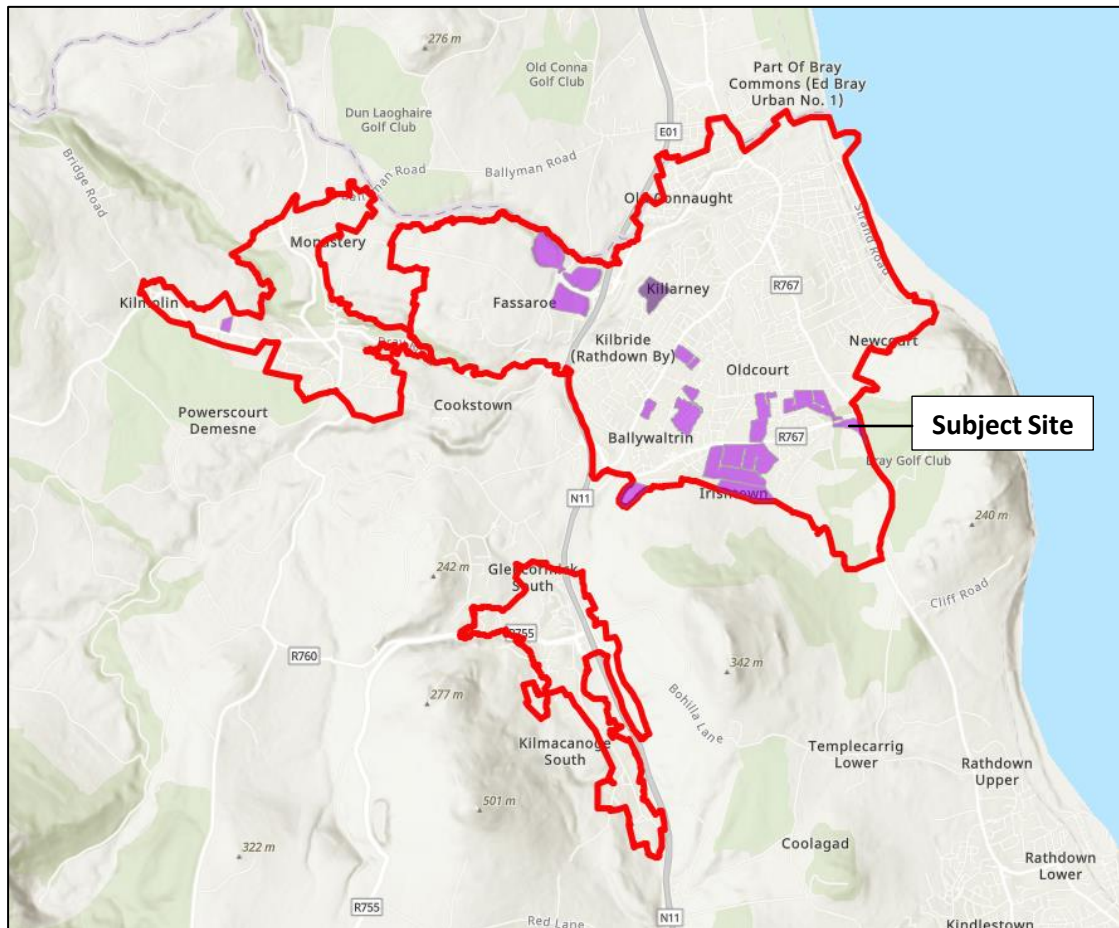


Figure 5.2: Location of lands zoned for employment within the *Bray Municipal District Local Area Plan 2018*. (Source: Wicklow County Council, as mapped and annotated by Tom Phillips + Associates.)

We highlight that these lands include not only existing employment lands, but also undeveloped or underutilised lands which have been identified for future employment use. An assessment of the Land Use Zonings in the 2018 LAP, using ArcGIS, identifies c. 76.87Ha of land zoned for employment use, of which c. 20.36Ha is currently undeveloped. This represents c. 26% of all employment land in the LAP. A large quantum of the land zoned for employment use within the 2018 LAP is located along Southern Cross Road.

³ Comprised of lands zoned 'E1 – Employment', 'E3 – Retail Warehousing', 'E – Special Employment', and 'FI – Film Industry'.

We contend, therefore, that based on the macroanalysis above, there is a sufficient quantum of land zoned for employment use in the Bray Municipal District to cater for the current and future demand. Further to this, we highlight the large amount of employment generating uses within the Town Centre and seafront areas, which are not captured within the ‘employment’ zonings.

In the interest of clarity, we confirm that our Client intends to retain the existing office use on site, however, other uses for the remaining undeveloped lands are being explored, particularly with regard to the opportunity to provide much needed housing at this strategic location.

5.3 Settlement Capacity and Residential Development

The 2018 LAP provides the following targets for housing stock delivery between 2016 and 2025:

	Bray	Enniskerry	Kilmacanogue	Rural Area
2016 Population	29,624	1,889	934	3,230
2016 Housing Stock	11,225	640	374	1,051
2025 Housing target	17,651	1,112	481	-
Growth	6,426	472	107	-

Figure 5.3: Extract from Table 2.7 of the 2018, which provides the Housing Stock growth target up to 2025 in Bray MD area, by settlement.

This table shows a targeted 57% growth in housing stock in both Bray itself and the Bray Municipal District between 2016 and 2025. Within the Municipal District, 92% of new housing stock is targeted to be located within the settlement of Bray.

The Residential Development Strategy for the Bray Municipal District is provided below, as set out in the 2018 LAP:

Residential Development Strategy for Bray Municipal District

- *“To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Bray MD;*
- *To ensure sufficient zoned land is available at appropriate locations capable of meeting the housing needs of the targeted population of the settlements in the MD over the plan period in a sustainable manner. Notwithstanding the zoning of land for residential purposes, the Planning Authority shall monitor and implement the population targets as set out in the County Development Plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded;*
- *To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish;*
- *To promote and facilitate the redevelopment of sites in town centres, including identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre;*

- *To promote and facilitate the rapid delivery of the maximum number of housing units in the key development areas of Fassaroe and the former Bray golf club.”*
[Our Emphasis.]

Further to the Residential Development Strategy outlined above, Residential Development Objective 4 also promotes the provision of infill development and the regeneration of underutilised sites:

Residential Development Objective 4

“To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.”

Specific Local Objective 1 relates to lands within Kilruddery:

Specific Local Objective 1

*“In this regard, given the **extreme shortfall of suitable housing land in Bray** and the **high demand for housing in the area**, and taking into account the Core Strategy of the Wicklow County Development Plan and the findings of the environmental sensitivity mapping carried out for the Strategic Environmental Assessment of this plan, it is considered that there is **additional land at Kilruddery that may be suitable for new housing.**”*

We highlight that the subject site previously formed part of the Kilruddery Estate, within ‘Kilruddery Demesne East’, therefore, it may be appropriate to extend this same Specific Local Objective to the subject site, to allow for new residential development to be considered at this location.

The 2018 LAP shows a targeted c. 57% increase in housing stock in the Bray Municipal District between 2016 and 2031, of which c. 92% should be located in Bray. The Settlement Strategy for the 2018 LAP places an emphasis on the provision of new housing through compact growth, particularly through infill development and the regeneration of underutilised sites within the existing built-up area.

5.4 Assessment of Existing Residentially Zoned Land

An assessment has been conducted of the interactive Current Land Use Zoning Map for the Bray Municipal District (available on the Draft LAP Consultation Portal and on ArcGIS).

The 2018 LAP splits the Bray Municipal District into three distinct settlements: Bray, Enniskerry, and Kilmaconoge. The Bray settlement is formed of two distinct geographical areas: the exiting built-up area of Bray, located east of the M11/N11, and Fassaroe, located west of the M11/N11. The location of these settlements and of the lands zoned for new residential development⁴ within the 2018 LAP are shown in Figure 5.4 below. We highlight that no land is zoned specifically for new residential development in Kilmaconoge and a relatively small area is zoned in Enniskerry. The majority of lands zoned for new residential development in the 2018 LAP were within the Bray settlement.

⁴ Comprising land zoned ‘R-HD – New Residential’, ‘R20 – New Residential’, ‘R15 – New Residential’, ‘R10 – New Residential’, and ‘R – Special New Residential’.

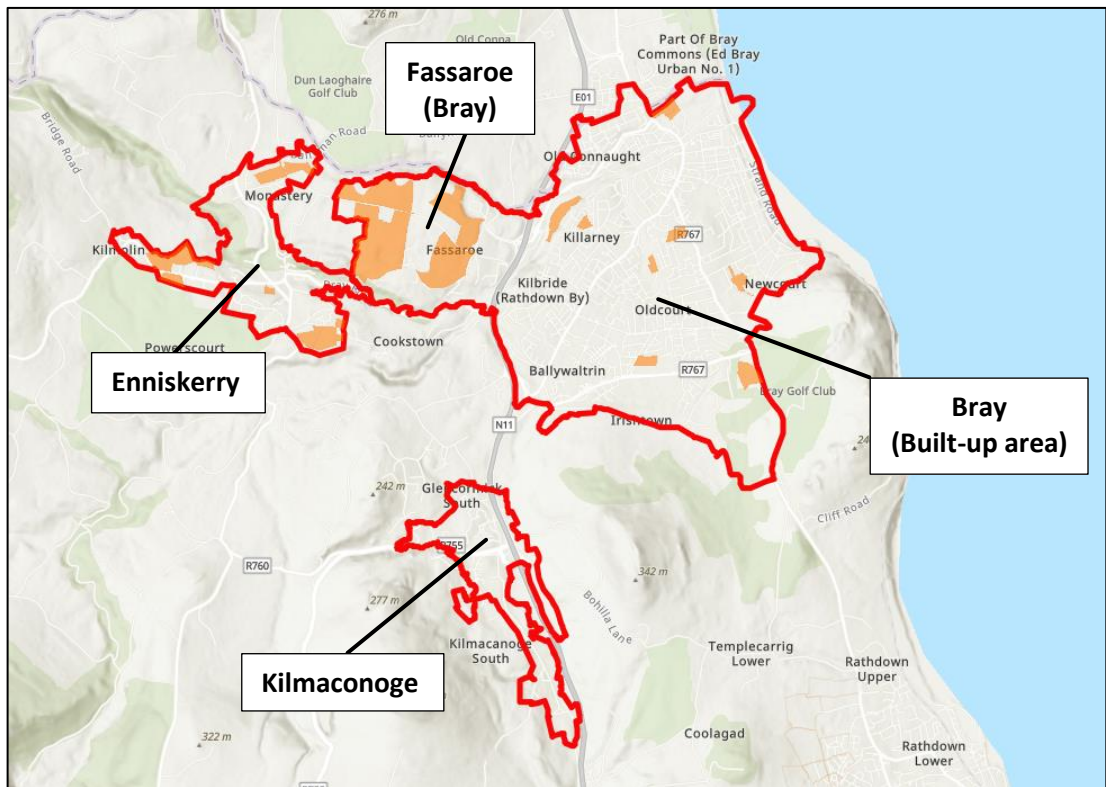


Figure 5.4: Lands zoned for new residential development within the *Bray Municipal District Local Area Plan 2018*. (Source: Wicklow County Council, as mapped and annotated by Tom Phillips + Associates.)

The geographical divide between the built-up area of Bray and Fassaroe is shown in Figure 5.5, which also denotes the physical boundary between them, the M11/N11.

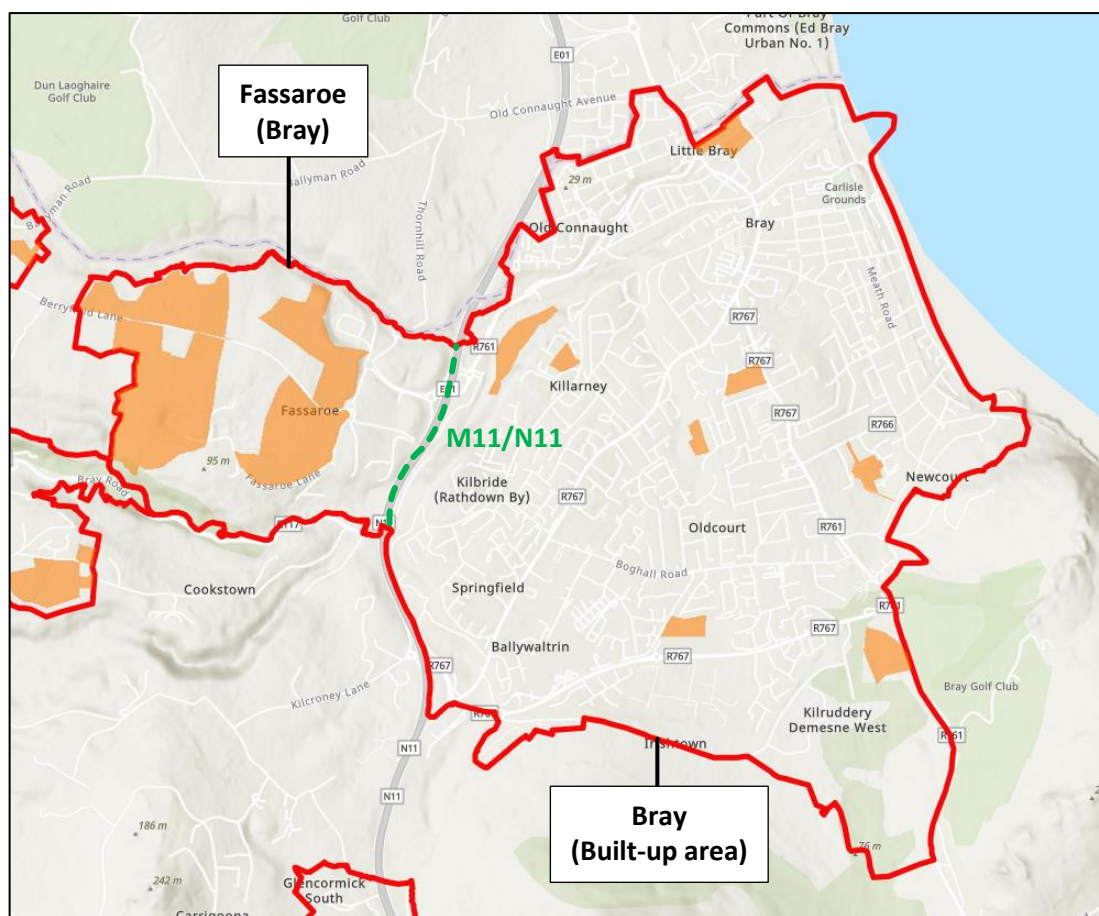


Figure 5.5: Lands zoned for new residential development within the settlement of Bray, as defined within the *Bray Municipal District Local Area Plan 2018*. (Source: Wicklow County Council, as mapped and annotated by Tom Phillips + Associates.)

Table 3.1, as set out in the 2018 LAP outlines all sites which were identified for new residential development in the Bray settlement within the lifetime of the plan. A total of 132.1Ha of land has been identified for new residential development, with a potential for 6,453 no. residential units. This potential number of new residential units aligns roughly with the target housing growth for the settlement, as set out in Table 2.7 of the 2018 LAP (Figure 5.3 above). We highlight that no surplus land was identified, therefore, to meet the housing targets, all land identified for new residential development would need to be developed during the lifetime of the plan to allow this target to be met.

LOCATION/DESCRIPTION	AREA (HA)	ZONING	POTENTIAL NO. OF UNITS
AAP1 - Fassaroe	13.89	RE	20
AAP1 - Fassaroe	78.78	R-HD	3,945
AAP1 - Fassaroe	1	NC	75
SLO 1 - Kilruddery	4.3	R20	86
SLO 2 - Rehills – The Slang	3	R-HD	100
SLO 3 - Former Bray Golf Club	9.92	MU	1,000
SLO 4 - Dell	3.75	MU	150
SLO 7 - AO Smith	3.2	MU	120
SLO 8 - Oldcourt House	1.14	R-HD	32
SLO 9 - Bray Southern Cross	2	R Special	80
OP 2 - Former Buckley Heitons, Dublin Road	0.6	TC	120
Bray Head Hotel, Bray seafront	0.3	SF	30
Former Dawson's, Bray seafront	0.42	SF	110
Bray Harbour	1.4	MU	*18
Brook House	1.2	R-HD	60
Presentation College	2.2	R-HD	75
Ravenswell	2.97	R-HD	150
FCA	2.03	R-HD	100
Infill on other TC / RE lands			200
TOTAL			6,453

Figure 5.6: Extract from Table 3.1 of the 2018 LAP, showing the sites zoned for new residential development within the 'Bray and Environs' settlement.

Of the 132.1Ha zoned for new residential development in the Bray Settlement, c. 71% (93.67Ha) is located within Fassaroe. These lands have a listed potential for c. 4,040 units.

Fassaroe is currently an agricultural area, which features a large quarry and linear pattern of residential development. This area is identified in the LAP for large scale new residential development, however it is outlined that development in this area is dependent on large scale infrastructure upgrades in the area, such as road upgrades and the provision of public transport linkages. By way of example, Berryfield Lane, the single thoroughfare for this area, is a country lane, which is only wide enough for one car at a time and does not feature footpaths. In its current form, large scale residential development would not be appropriate.

Within the course of the 2018 LAP period, only one planning application was lodged in respect of the large area zoned for residential development in Fassaroe, ABP Reg. Ref. 313314, which is yet to be determined by An Bord Pleanála. A new park and ride facility within Fassaroe has been permitted, however, there are no signs as of yet of constructed having commenced.

Whilst Fassaroe is an important area for new residential development in Bray, we highlight that no new residential development was realised in this area during the lifetime of the 2018 LAP, potentially due to the lack of existing infrastructure in the area. Therefore, we contend that the development of Fassaroe is likely a longer term goal, compared to other sites within the existing footprint of Bray, which has the necessary services and infrastructure in-situ.

We have provided below a breakdown of the remaining c. 38.43 of land identified for new residential development in the Bray settlement, as set out in the 2018 LAP.

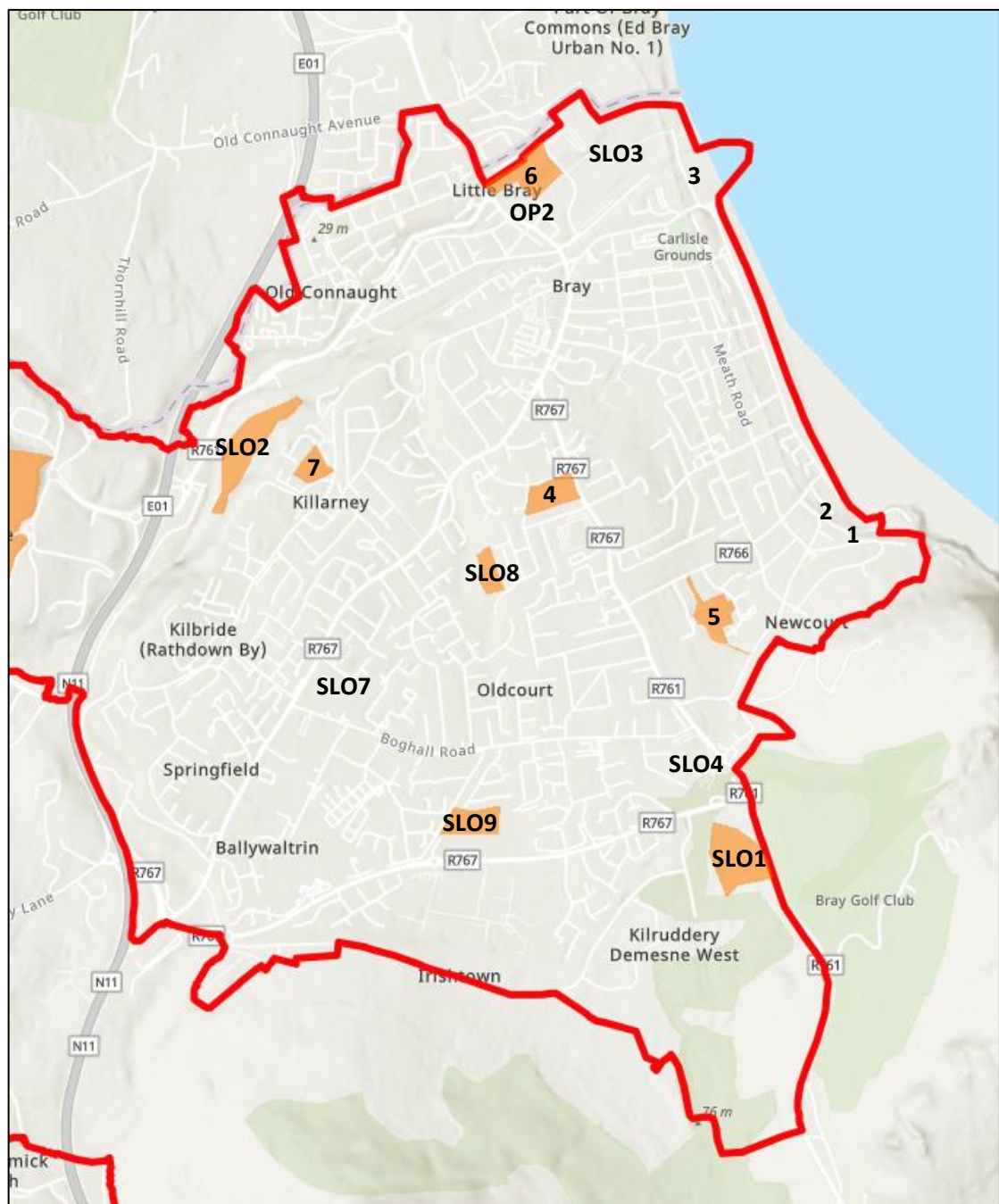


Figure 5.7: Location of sites identified for new residential development within the built-up area of the Bray settlement, as set out in the *Bray Municipal District Local Area Plan 2018-2024* (as mapped by Tom Phillips + Associates, 2024).

Site No.	Status
SLO1	Kilruddery Two-phase residential development (permitted under Reg. Refs. 21/1453 and 21/1501) comprising a total of 130 no. units, which is nearing completion.
SLO2	Rehills – The Slang No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
SLO3	Former Bray Golf Club A total of c. 550 no. units permitted under ABP Reg. Refs. 31181-21, as part of Phase 1 of a two Phase development. Currently under construction.
SLO4	Dell LRD comprising 178 no. units granted Permission in March 2024 (Reg. Ref. 24/46).
SLO7	AO Smith Permission Granted in January 2024 (Reg. Ref. 23/60133) for 12 no. residential units above existing supermarket within existing developed portion of site. No Planning Applications lodged in respect of the remainder of the site during the previous LAP period. There are no historic Planning Applications visible for the development of the remainder of this site.
SLO8	Oldcourt House No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
SLO9	Bray Southern Cross Residential development comprising 208 no. units constructed and currently occupied.
OP2	Former Buckley Heitons, Dublin Road SHD Application for 139 no. units lodged in August 2022, awaiting a decision from An Bord Pleanála.
1	Bray Head Hotel, Bray Seafront Residential development comprising 49 no. units permitted under Reg. Ref. 18/938 (as amended) granted in June 2019.
2	Former Dawson's, Bray Seafront Existing operational car park. Application Granted in February 2024 (Reg. Ref. 23786) for retention for 5 years of occasional amusement, carnival, and festival use.
3	Bray Harbour No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
4	Brook House No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.
5	Presentation College SHD granted Permission in March 2022 (ABP Ref. 312020-21) for 179 no. residential units. Construction appears to have begun.

6	Ravenswell Site comprises St. John of God campus, which is operational. No “vacant” land onsite. No Planning Applications for redevelopment. No specific Objectives in LAP to redevelop these lands.
7	FCA No Planning Applications lodged in respect of this site during the previous LAP period. There are no historic Planning Applications visible for the development of this site.

Through an analysis of the sites zoned for new residential development within the Bray settlement, as set out in the 2018 LAP, only a small number of the sites have been brought forward for development over the lifetime of the plan. We contend that only four of these sites have been constructed or are under construction, two have live permissions but it is unclear if these have yet begun construction, and two are awaiting planning permission. Nine sites have not had any planning applications lodged in the life of the 2018 LAP for new residential development, and a number of these sites have had planning applications for other forms of development during this same period, reflecting that there may not be any intention to redevelop these lands.

We contend that based on the analysis above, it is unlikely that the targets for new housing, as set out in the 2018 LAP, were met. Therefore, the new Draft LAP must account for the shortfall carried over from this previous development plan period. These sites may have future development potential and therefore should remain zoned as such. We contend, however, that additional land must be zoned for new residential development, to ensure that the current shortfall of housing can be met, whilst also ensuring that a sufficient quantum of land is available to meet the future housing needs over the lifetime of the new LAP.

To align with national, regional, and local planning policy, we would encourage that additional land be zoned for new residential development within the existing footprint of Bray, allowing for compact growth by facilitating increased infill development and regeneration of underutilised sites. This will alleviate the dependency on the delivery of housing in Fassaroe, which does not currently have the necessary infrastructure to facilitate development at the scale outlined in the 2018 LAP.

6.0 CONCLUSION

As identified in the Issues Papers for the forthcoming *Bray Municipal District Local Area Plan 2025*, the Bray Municipal District will require the provision of new housing, of which 30% is to be provided within the existing built-up area. It is evident from the analysis provided above that the current quantum of zoned residential land available is unlikely to be capable of meeting these requirements.

It is, therefore, evident that additional land is required to be zoned for new residential use, particularly within the built-up area of Bray.

We would encourage the Local Authority to consider the potential for regeneration of underdeveloped sites within the town and suburbs for potential future residential development.

We look forward to written acknowledgement of receipt of this submission in due course.

A handwritten signature in blue ink, appearing to read 'John Gannon'.

John Gannon
Director
Tom Phillips + Associates

APPENDIX A

Full Planning History for the Subject Site

Reg. Ref.	94/941
Applicant	Dwyer Nolan Developments Ltd
Lodgement Date	21/10/1994
Decision	Refused Permission
Decision Date	20/12/1994
Proposed Development	<i>"20 no three & four bedroomed houses on site of 5.6 acres."</i>

Reg. Ref.	00/3633
Applicant	Kilruddery Demesne E & W, Bray
Lodgement Date	11/12/2000
Decision	Grant Permission (Subject to 22 No. Conditions)
Decision Date	31/01/2002
Proposed Development	<i>"New road and construct office building with ancillary works."</i>

Reg. Ref.	02/7315
Applicant	Micro Developments
Lodgement Date	03/12/2002
Decision	Grant Permission (Subject to 16 No. Conditions)
Decision Date	16/01/2004
Proposed Development	<i>"Office Building of circa 1400 sq. m. together with associated site works."</i>

Reg. Ref.	07/1765
Applicant	Jarlath Sweeney T/A Microdevelopments
Lodgement Date	13/08/2007
Decision	Grant Permission (Subject to 15 No. Conditions)
Decision Date	07/11/2007
Proposed Development	<i>"Alterations and extensions (c. 1616sq.m.) to building as granted under plan ref. reg. 02/7315 (c. 1400sq.m.) together with retention of building works as constructed to date, under Croft Car Parking, alterations to site boundaries to accommodate road improvements, landscape protection/screening measures, reduction in entrance roadway as previously granted and associated siteworks."</i>

Reg. Ref.	09/721
Applicant	Jarlath Sweeney
Lodgement Date	22/06/2009
Decision	Grant Permission (Subject to 3 No. Conditions)
Decision Date	15/07/2010
Proposed Development	<i>"Alterations and extensions (273 sqm) to building as constructed under plan ref number 02/7315 (1400 sqm) and subsequent extensions (1616 sqm) as granted under plan ref number 07/1765 (not yet constructed) all together with associated site works."</i>



Reg. Ref.	12/6518
Applicant	Jarlath Sweeney
Lodgement Date	09/07/2012
Decision	Grant Extension of Duration
Decision Date	16/08/2012
Proposed Development	<i>"Extension of Appropriate Period - alterations and extensions (161sqm) to building as granted under plan ref. reg. 02/7315 (c.1,400sqm) together with retention of building works as constructed to date, undercroft car parking, alterations to site boundaries to accommodate road improvements, landscape protection/screening measures, reduction in entrance roadway as previously granted and associated siteworks."</i>

Reg. Ref.	12/6778
Applicant	J. Sweeney t/a Microdevelopments
Lodgement Date	31/10/2012
Decision	Grant Permission (Subject to 6 No. Conditions)
Decision Date	21/06/2013
Proposed Development	<i>"Alterations to building extensions as granted under Planning Ref No 07/1765 (Extension of Duration granted under Plan Ref 12/6518), incorporating reduction of extension floor area from 1616 sqm to 1137 sqm together with the removal of proposed undercroft car parking area, all together with associated site works."</i>

Reg. Ref.	20/93
Applicant	Rachael Davis
Lodgement Date	03/02/2020
Decision	Grant Permission (Subject to 4 No. Conditions)
Decision Date	03/02/2021
Proposed Development	<i>"Retention - change of use from offices to pilates and physiotherapy."</i>