



An  
Bord  
Pleanála

**Case Reference:  
ABP-308291-20**

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## **Planning and Development (Housing) and Residential Tenancies Act 2016**

### **Notice of Pre-Application Consultation Opinion**

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**Proposed Development: 564 no. residential units (96 no. houses, 468 no. apartments), childcare facility and associated site works.**

**Former Bray Golf Club Lands, Off Ravenswell Road and Dublin Road, Bray, Co. Wicklow and Co. Dublin.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

#### ***Design and Layout***

1. Further consideration / amendment or justification of the design and layout of Block 1C to provide a strong urban edge for the development, in particular the ground floor uses on the southern elevation which front onto the 'Market Square' and future potential Luas Line.

2. Further consideration / amendment or justification of the scale and bulk of Block 1D having regard to the residential amenities of the adjoining properties and the visual amenities of Woodbrook Glen and the open space zoning objective of lands located to the north of the site.
3. Further consideration / amendment or justification of the proposed surface level car parking at 'The Orchard' along the southern site boundary, having regard to the proximity to existing and proposed public transport infrastructure and the potential negative impact of surface level car parking on the public realm.

### **Water Services**

4. Further consideration of the relocation of Irish Water infrastructure located underneath 'The Orchard' in the south west portion of the site having regard to its potential negative impact on the development potential of the site and the public realm. In the event that the infrastructure is not to be relocated then a justification should be submitted at application stage that seeks to address, *inter alia*, the potential negative impact on the development potential of the site and the public realm at this location.
5. Further consideration / amendment or justification of the design of the storm water management proposals, including the location of attenuation tanks, having regard to existing underground infrastructure within the site and to all available flood maps / information regarding the potential for pluvial, fluvial and coastal / tidal flood risk within the site. A site-specific Flood Risk Assessment should be submitted. Further consideration of the concerns raised in the report of Dun Laoghaire Rathdown County Councils Drainage Planning Section dated 12<sup>th</sup> October 2020 and concerns raised under the Drainage section of Wicklow County Councils written opinion dated 28<sup>th</sup> October 2020.
6. Further consideration / amendments of the documents as they relate to foul water drainage proposals to service the development. The documents should provide details of necessary upgrade works required to facilitate the development to include, *inter alia*: plans and particulars, having regard to the wastewater network constraints raised by Irish Water in their report dated 22<sup>nd</sup> October 2020.

## ***Transportation***

7. Further consideration of the documents as they related to access and emergency access to the site. Clarity is to be provided concerning who is to deliver the proposed road network; the status of any planning and other consents required to deliver the infrastructure; the timelines involved in the delivery of the required infrastructure in the context of the proposed strategic housing development. Further consideration of the concerns raised in the report of Dun Laoghaire Rathdown County Councils Transportation Planning Section dated 13<sup>th</sup> October 2020 and concerns raised in the report of Wicklow County Councils Roads Section dated 15<sup>th</sup> October 2020.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A report that addresses and provides a clear design rationale for the proposed height, density, design and character of residential units and details of the materials and finishes of the proposed development. Particular regard should be had to the requirement to provide high quality, robust and sustainable finishes and details which seek to create a distinctive character for the development, having regard to the coastal and highly visible location of the site.
2. A report that addresses and provides a justification for the proposed housing mix.
3. A building life cycle report in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).

4. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces.
5. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces and Part V provision.
6. Childcare demand analysis, including but not restricted to the justification for size of the proposed crèche, having regard to the existing childcare facility in the vicinity of the site, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.
7. School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.
8. A landscape and permeability plan of the proposed open spaces within the site clearly delineating public, semi-private and private spaces, areas to be gated and proposed boundary treatments, in particular the eastern boundary at the interface with the railway line.
9. Submission of a Traffic and Transport Assessment, including a quality audit of the junctions and road network between the proposed entrance and Castle Street / Dublin Road. The audit should include details of the capacity of the surrounding road network and the impact of the proposed development, details of available sightlines, pedestrian and cycle facilities and recommendations for potential improvements to the public road, if required.
10. Submission of an Archaeological Impact Assessment.
11. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or

local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format. The notice and statement should clearly indicate which Planning Authority statutory plan it is proposed to materially contravene.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Department of Education and Skills
2. Irish Water
3. Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
4. The Heritage Council
5. An Taisce
6. The Commission for Railway Regulation
7. Iarnrod Eireann
8. Transport Infrastructure Ireland
9. Wicklow County Childcare Committee
10. Dun Laoghaire Rathdown Childcare Committee

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Rachel Kenny

Director of Planning

February, 2021