



An  
Bord  
Pleanála

**Case Reference:  
ABP-312257-21**

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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), creche and associated site works. Former Bray Golf Club Lands, off Ravenswell Road and Dublin Road, Bray, Co. Wicklow.**

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.

#### **1. Development Strategy.**

- (a) Further clarity / consideration / justification of the documents as they relate to what precisely is being proposed as part of any future proposed development, what the redline boundary encompasses. Regard being had to portion of the site permitted under SHD – 311181 and how any future proposal links with the approved portion of that permission. The further

consideration of these issues may require an amendment to the documents and/or design proposals submitted.

- (b) Further consideration with respect to 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 previous reason for refusal on foot of SHD 311181-21 and justification of the proposal in terms of urban design such as height, scale, massing in the context of the site's location and architectural design treatment and interface with Bray seafront and 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 visual amenity given the coastal and highly visible location of the site and its interface with Bray seafront.

## **2. Intensity of Development:**

Further consideration and / or justification of the documents as they relate to the height, scale, massing, plot ratio, tenure mix and tenure type and overall intensity of development given the provisions of the DLRDCDP 2022 – 2028 and the Bray MD LAP 2018.

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 detailed statement of consistency and planning rationale, clearly outlining how in the prospective applicant's opinion, the proposal is consistent with the zoning objectives of the DLRDCDP 2022 – 2028 and the Bray MD LAP 2018.
- 2.** A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development

materially contravenes the DLRD County Development Plan 2022 - 2028 and Bray MD LAP 2018 other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

3. A visual impact assessment of the proposed development that addresses, inter alia, the height, scale and massing of the proposal in the context of the nature of the receiving environment. Long range views / photomontages of the proposed development from the surrounding area, in particular from the east.
4. An assessment on how the proposed scheme ties in with the expansion of the overall Bray seafront area in particular in light of recent split decision on foot of SHD 311181-21. It is important that the proposed scheme should be highly visually and functionally connected to the portion of the scheme permitted under the recent SHD 311181-21. There needs to be strong permeability within the scheme and into adjoining lands.
5. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.
6. A Traffic and Transportation Impact Assessment.
7. Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.

- 8.** A report that addresses issues of residential amenity, specifically with regards to potential overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and any adjacent existing or permitted development.
- 9.** A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies. Impact to any neighbouring properties.
- 10.** A full response to matters raised within the PA's CE Opinion's (both Wicklow County Council and Dun Laoghaire Rathdown County Council) and addendum reports submitted to ABP.
- 11.** Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.
- 12.** A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.
- 13.** An AA screening report which considers potential impacts on the Qualifying Interests of any Natura 2000 site.
- 14.** An up to date Ecological Impact Assessment, inclusive of a Bird and Bat Survey.
- 15.** Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.

**16.**A Microclimate Impact Assessment.

**17.**A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

**18.**Site Specific Construction and Demolition Waste Management Plan.

**19.**A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

**20.**Details of public lighting.

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, as amended:

- 1. Irish Water (IW)**
- 2. The Commission for Railway Regulation**
- 3. Iarnrod Eireann**
- 4. Transport Infrastructure Ireland (TII)**
- 5. National Transport Authority (NTA)**
- 6. Dun Laoghaire Rathdown County Council Childcare Committee.**

7. Wicklow County Childcare Committee.
8. The Minister for Culture, Heritage and the Gaeltacht,
9. The Heritage Council
10. An Taisce — the National Trust for Ireland
11. Fáilte Ireland

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Tom Rabbette/Rachel Kenny  
Assistant Director of Planning/Director of Planning  
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