

119 Greenpark Road
Bray
Co. Wicklow

30.10.2022

Ref. TA06D.314686.

Dear Sir or Madam,

I wish to submit an Observation regarding Shankill Property Investments Ltd.'s Strategic Housing Development application to build on part of the former Bray Golf Club lands at Ravenswell, Bray, Co. Wicklow - Case Ref. TA06D.314686.

1) As a member of Bray sailing club which has its club building at Bray Harbour I believe that the 12 storey building proposed at the south east corner of Block B2 of this development will destroy the character of our harbour and coast. I see from their proposal that the 12 storey building is to be joined at a later phase of the development by an even taller 'landmark' building creating an overwhelming imposition at the entrance to our coastal town. Shankill Investments' argument that this building and its follow on 'landmark' building will form a 'visual connection' to the town is a fabrication and its main effect would be to swamp the seafront, and loom gigantically above the harbour, dwarfing it and destroying not only its charm but the views of the Dublin Mountains in the distance. From Bray head, along the Victorian promenade and on to the our low built harbour this structure would be a violation of the heritage landscape of the seafront. Bray is not a city and its town status should be supported with appropriate architecture.

I have the privilege of sailing in the waters off Bray and as an instructor with Bray sailing club I have the joy of showing learner sailors, young and old, as well as the mentally and physically handicapped the beauty of our sea, coast and the landscape beyond. It would be a travesty to impose high-rise buildings on this vista through a refusal to acknowledge that this stretch of coast is a visual amenity that borders an important recreational amenity housing our community orientated sailing club, our sea scout building, swimming platforms, boxing club, swan sanctuary and kayak and paddle board facility. It is an integral part of our town's identity and must not be lost to unnecessary 'statement' development. As a coastal town, Bray is part of a contoured vista appreciated from Killiney looking southwards and Bray Head looking northwards and from various points on land and sea along Dublin Bay. From Howth Head to Wicklow Head the landscape undulates but at no point does it have tall buildings to the fore. Even Dublin City, set back as it is in the bay does not have high-rise buildings on the seafront. Shankill Investments' proposed 12 storey building and its 'landmark' companion are 40 metres from the harbour making this proposed development a seafront build. Please prevent our local coastline becoming a blight on the landscape.

**Re: Shankill Property Investment's Application:
Case Ref. TA06D.314686 – Former Bray Golf Club lands**

2) It appears to me that this development does not have the required mix of uses (over 95% housing) under Major Town Centre Zoning Objectives to justify such tall buildings.

3) Having left school this year I am now studying physics with the intention of focusing on prototype assimilations and testing to develop sustainable alternatives to carbon heavy technology. Building taller and denser is *not* the path to sustainability as it is now well known that tall buildings have a higher carbon footprint and far greater embodied energy (ie. the resources that go into building them; material manufacturing, steel, concrete, underpinning, maintenance) than low rise builds (6 storeys max). The World Green Building Council promote the assessment of 'whole life-cycle' rather than 'energy efficiency' carbon emissions and advocate high-density low-rise developments. Quick fix, developer driven infrastructure undermines Irelands carbon emission intentions at a time when carbon debt needs to be tackled now and not in promised payback over the next century or lifecycle of a building. Shankill Investment's proposed 12 storey building and their proposed 'landmark' building are not sustainable builds. Their cost to the environment far outweighs the value of the additional living units provided.

From where I'm standing, age 19, the future of the earth looks bleak. And if we can't trust our legislators to implement appropriate rules and call out the construction industry on its significant impact on the environment then you, the planners of today, through lethargy and shortsightedness are responsible for a passing my generation the inheritance of an untenable future.

4) Since before I was born my neighbourhood has campaigned for the conservation of the floodplain on the Bray Golf Club lands down-river from our homes. I believe more informed members of our community have made submissions on this and I wholeheartedly support their views. Simple ecology dictates that we don't build on our floodplains. Why are we not being listened to?

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F. Gibbins