

119 Greenpark Road, Bray, Co. Wicklow, A98 W448

Your Ref. TA06D.314686.

Sunday 30 October 2022

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.

I have 4 main points

1. Inadequate infrastructure to support increase in population.
2. Shankill Investments' new road and Wicklow County Council's Part 8 proposal (Ref. PRR 21/869) to build an access road across these lands to their proposed public transport bridge which is presently the subject a *Judicial Review*.
3. Building Height.
4. Flood risk.

1) Inadequate infrastructure.

Shankill Investments' planning submission leans heavily on this sites accessibility to public transport and its pedestrian and cyclist credentials. However while the dart is accessible via the underpass to the harbour and Castle St. has a bus route most of the transport options presented in this plans *Traffic* section is still only at the 'proposed' stage.

a) A proposed public transport bridge (Planning ref PRR 21/869) crossing the river adjacent to the railway bridge and sited throughout Shankill Investment's proposal for this site is under Judicial Review.

b) There is as yet no sign of the proposed Bus Connect Core Corridor 13 and Bray it is the last phase of this plan.

c) Pedestrian and cyclist bridges adjoining the Fran O'Toole bridge don't have a planning reference and are therefore not imminent.

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d) A link road from the development to the Dublin Rd. junction with the Upper Dargle Rd. is sited in Shankill Investments' Masterplan for this site but is not included in this phase and is therefore of no benefit to this new community.

e) A Luas Line extension is not scheduled until 2040 if at all. This is a whole generation away.

With an estimable population increase of thousands of people when this phase of building is completed it stands to reason that at least some of the proposed infrastructure should be in place either prior to or in concurrence with the build. It goes without saying that without appropriate infrastructure to facilitate the residents of this new build all 549 parking spaces in the development will be utilised, leading to even more chaos on the Dublin Rd, Castle St. and Fran O'Toole Bridge.

2) Shankill Investments' new road and its connection with Wicklow County Council's Part 8 proposal (Ref. PRR 21/869) to build an access road across these lands to their proposed public transport bridge: *this proposal is at present the subject of a Judicial Review.*

The southern part of Shankill Investments' application is built around a proposed access road to a proposed public transport suspension bridge which is the subject of a Judicial Review at present. Wicklow County Council submitted a Part 8 proposal (Ref. PRR 21/869) for this bridge and access road, maintaining that it would have no effect on the environment, and so an EIS would not be required. An Bord Pleanála's Inspector agreed with that assessment and that decision by An Bord Pleanála is currently subject to a Judicial Review.

Shankill Investments claim that their application is 'stand-alone', yet their drawings, their graphics, and their text show differently. In particular, their proposal on page 77 (graphic on page 78 at Fig. 18) of their Flood Risk Assessment proposes building up the level of the ground at the southern end of the site against the side of the proposed access road, which is proposed to be built on an embankment:

"In order to enable a sustainable development of the site and **to reduce the risk of flood inundation to the site it is proposed to raise ground levels within the southern area of the site.** It is also proposed to include a proposed road along the southern boundary within the model."

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This simply assumes the access road will go ahead, regardless of the ongoing judicial process. This assumption is shown from the very beginning of their documentation, i.e. the second and third Architect's drawings shown at <https://coastalquartershd2.com/drawings/architecture/>.

Drawing BRA-GHA-SW-XX-DR-A-05001 (Site Location Map) shows the schools' road, leading to the railway underpass, as it is at present. In Drawing BRA-GHA-SW-ZZ-DR-A-05002 (Site Layout Plan, Sheet 1 of 2), however, the part of the schools' road between the area they designate as the Orchard (in front of Coláiste Raithín) and the railway underpass disappears as a public road as can be seen in particular in Figure 20: Overall Site Layout on page 18 of the Architectural Design Statement

Wicklow Co. Council's disputed access road consistently appears as an integral part of the applicant's plans in any map or graphic on or below the present schools' road between Coláiste Raithín and the railway underpass, including the following text from page 33 of the Architectural Design Statement, which refers to Figure 33 on the same page:

"The main access road leading to the future public transport bridge and the link from this road to the rail underpass will be taken in charge by the Local Authority."

As noted at the beginning of this section, the applicant's plans actually include building up the ground at the southern end of their site against the proposed access road.

In addition, Page 47 of the Architectural Design Statement says:

"Care has been taken to ensure that landscape levels along the Coastal Gardens are raised above the existing ground levels so that the new ground levels will be close to podium level."

In short, this application, once it reaches the present schools road, is inextricably linked with Wicklow's Part 8 proposal.

3) Building Height.

It is proposed that the south east corner of Block B2 of this development be 12 storeys. It should be noted that Shankill Investment's proposed 12 storey building has a companion

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'landmark' building intended for the next phase of development. These proposed buildings are 40 metres from a public beach (skirted by low warehouses) and are therefore seafront buildings.

This 12 storey building (and the 'landmark building') are not suitable for this site because;

- a) It does not meet the required mix of uses under Major Town Centre Zoning Objectives (and therefore justification for high build) as it is over 98% housing.
- b) Tall buildings have a higher carbon impact. Their embodied energy (ie. the resources that go into building them; material manufacturing, steel, concrete, underpinning, maintenance) is far greater than low rise builds (6 storeys max). As Shankill Investments' tall buildings will be built on a golf course, formerly an estuary and therefore devoid of sub rock, considerable underpinning will be necessary. 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. Carbon debt needs to be tackled now not in promised payback over the next century or lifecycle of a building.
- c) Despite Shankill Investments' argument that this building and its follow on 'landmark' building will form a 'visual connection' to the town its main effect would be to dilute the seafront heritage value of Bray. From Bray head, along the Victorian promenade and on to the low built harbour this structure would be a violation of the heritage landscape of the area. It is our responsibility as residents and your responsibility as planners to choose appropriate development in areas of visual, social and topographical sensitivity. This land will only be built on once, it should adhere to its surroundings in a meaningful way.
- d) Bray is not a city, it is the gateway to a rural county, Wicklow. Perhaps because of its long standing seaside holiday resort tradition Bray still draws countless day-trippers and tourists visiting for the beach and the beautiful local walks and restaurants and in the future it will attract cyclists following the proposed coastal cycle-way from Dublin (as part of the new cycle network) . The ambience and green-route nature of this pathway will be destroyed if new builds are not set sensitively into the landscape.
- e) Bray is 22km from Dublin and, because of the Dart, accessible for working in Dublin. People who live in Bray choose to live here not just for this convenience but because it is

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a seaside town rather than a city suburb. Housing needs can be met without destroying that 'town' personality. Anything built in the town centre should have a focus on contributing to a vibrant and multifunctional town centre that interacts with its environs. Research has shown that the taller the building the less engaged with the community its inhabitants and the more disassociated its neighbours feel.

- f) The SHD nature of this project, (ie. the absence of community input in decisions) means that locals have not been consulted whether or not they want high buildings between them and the sea. Communities, the very people who live and breath their surroundings, should be allowed a say in their buildings.
- g) As a costal 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 shore. Our national visual landscape and shoreline heritage requires conservation.

4) Flood Risk.

<https://coastalquartershd2.com/wp-content/uploads/2022/documents/Reports/Engineering/FLOOD%20RISK%20ASSESSMENT.pdf>

a) Flood Zoning:Shankill Investments' application assesses "the majority of the Coastal Quarter", that is the high ground (above the present schools' road) as a Flood Zone C:

- on page 36 at 6.3;
- twice on page 27 (pdf page 75) at 5.1 and 5.2 of their Technical Note; and again
- on page 29 at 6 (pdf page 77), where they add: "A limited portion within the southern corner of the site is located within a Flood Zone 'A' and Flood Zone 'B' during both the fluvial and tidal flood events."

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However, Bray's Local Area Plan 2018 clearly shows almost all of the entire former Bray Golf Club lands – both above and below the schools' road – as Flood Zones A and B. See page 20 (pdf page 23) of Appendix C: Flood Risk Assessment of Bray's Local Area Plan 2018 at

<https://www.wicklow.ie/Portals/0/Documents/Planning/Development-Plans-Strategies/Local-Area-Town-Settlement-Plans/Bray/Bray-Municipal-District-Local-Area-Plan-2018/Appendix%20C%20-%20Strategic%20Flood%20Risk%20Assessment%20-Bray%20MD%20LAP%202018.pdf>

Their Justification Test for allowing Mixed Use development on any portion of this site is dependent on the accuracy of that assessment. In other words, if Shankill Investments' flood zoning is correct, then the Justification Test - on which Bray Municipal and Wicklow County Council are allowing Mixed Use development throughout this site – fails.

A flood assessment that focuses only on the proposed development and pays no attention to the topography of the surrounding area disregards the safety and well being of the largely vulnerable and elderly community who live up-river by blocking a necessary flow-path from their homes to the sea. In the event of flooding in the low-lying area between the Upper and Lower Dargle Roads the water traditionally escapes through the low area of the golf club lands and is one of the reasons this land hasn't been built on. Flood defences built in recent years are a great comfort but don't prohibit and cannot fully defend against flash floods from the mountains which combined with rising sea levels will over-top the defences and seek the easiest route to the sea, through little Bray and the golf club lands. Putting a very expensive flood defence system in place, and then allowing development on a floodplain downstream, is a failure in planning and contravenes the EU recommendation not to build on floodplains.



Yours Sincerely,
Howard Gibbins.