



An  
Bord  
Pleanála

## Observation on a Strategic Housing Development application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's  
name

Lorraine M Flanagan

(b) Observer's  
postal address

3A Killarney Road, Bray, A98W0X3 County  
Wicklow

### Agent's details

#### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N/A

(b) Agent's postal  
address

N/A

## Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at  
the postal address in  
Part 1

☒ Y

The agent at the postal  
address in Part 2

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## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**

(for example: 300000)

314686

- (b) **Name or description of proposed development**

Coastal Quarter Bray - changes to original planning application -  
doubling of housing stock

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Golf Club Lands, Ravenswell, Bray, Co. Wicklow

## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write. You can also insert photographs or images in this box.

(See part 6 – Supporting materials for more information.)

#### 1. Observation submitted by:

Lorraine M Flanagan, H.Dip (Arts) B.Sc. (Hons) M.Sc  
Environmental Auditor, Environmental Manager, Sailing Instructor.

#### 2. Foreword

#### 3. Planning observations/arguments

#### 2. Foreword

As a foreword to the planning reasons and arguments I have to ask pose the questions of 'Why'.

Why this particular site? In Bray there are many viable locations and vacant sites on which Strategic Housing developments would aptly sit.

Why in an era of climate emergency would anyone pursue a building project when no one can say with 100% certainty that it will not impact and add to climate change, nor that climate change will impact upon it - no one - unless the author at page 13 of the Natura Impact Statement had a highly tuned crystal ball can speak categorically with regard to little or no impact.

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The lands in question have been unused for many years, the grasslands are transitioning and returning to diverse grasslands with species richness and to term the grasslands as current 'amenity' is a significant oversight.

To classify the lands as low value is 'convenient' if not untrue. The lands are a rich habitat for mammalian, bird, amphibian and insect life. Mature trees and a relatively quiet habitat lend itself wholly to having become a re-established wildlife oasis.

The proposed 12 storey high development will leave it's mark, a permanent one. Were I personally in a position to opt not to build this, I would, money is only money and this development boils down to finance. The desperate youth of Bray need homes, realistically how many of those would even hope to afford one of these proposed units? There is a choice here to leave a re-wilded zone of land to it's rightful inhabitants and leave a legacy of nature and doing the right thing as opposed to bullying through with a myriad of reports and glossy brochures to leave a legacy of concrete.

### 3. Planning observations/arguments:

#### **Biodiversity and the Local Authority:**

Wicklow County Council were the first Local Authority in Ireland to declare a Biodiversity emergency.

<https://greennews.ie/wicklow-county-council-climate-emergency/>

## 5. Grounds

<https://www.irishtimes.com/news/environment/wicklow-council-declares-biodiversity-and-climate-change-emergency-1.3879187>

Quote from the Irish Times article "We are destroying our children's future, their natural ecosystem, their climate, their mental well-being, and their quality of life. The Wicklow community have made their voice heard. We have too much to lose and no time for inaction".

The Local Authority (Wicklow) will in due course (having been approved funding for same) will recruit and appoint a Biodiversity Officer for their respective county. I would urge APB to press pause on this application until such time that the Biodiversity Officer is in situ and in a position to advise their local authority and local community and sign off on a comprehensive Biodiversity Plan.

I would also urge the same be accommodated to provide a fair, just and objective analysis and direction, I view this as a serious request that requires a wholehearted assessment from APB - it is my view that the EIAR nor the NIS come across as objective, while issues are alluded to, I remain highly sceptical and worried that this is the bar in the year 2022, while in a biodiversity and climate emergency.

### **The site's current use and value:**

On my first visit to the site, I was hugely surprised and impressed by the expanse of 'wild' habitat. While once golf lands of manicured amenity grass, this has evolved to be an asset to the heavily built up environment of Bray Town and surrounds. It is now a wildlife haven and corridor in an area of Bray that would otherwise have a full urbanised landscape.

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For locals it represents a peaceful location to escape the traffic and urban noises. For those living in apartments, residents who are long-stay now in The Royal Hotel, and or homes with small or no gardens it offers an oasis of nature on their doorstep. Notwithstanding the proximity to the People's Park, this site offers something more to human health and mental health.

The site is used as a casual and informal amenity area: it is frequented by dog walkers as it is an excellent and safe area to allow dogs off lead. The site is used by quiet people seeking solace.

The site provides a 'wild' area to explore for children who may otherwise have no sense of nature and what it means to be in it.

I see no 'valuation' in terms of this site's value to wildlife - one could argue that there are a considerably subjective series of observations. Were this site to be valued in economic terms for 1. Wildlife, 2. Amenity, 3. Human Health & Well being and 4. Climate change.

I would estimate such a valuation would incline towards a much greater value to the economy than a quick grab and run and distillation of concrete mass.

I see no cost benefit analysis of the change of use of this site?

In terms of valuation the available tools are available for this and I would urge ABP to insist on a comprehensive valuation process. We cannot simply ignore climate change and biodiversity loss and valuation offers an important route to making a fully informed decision.



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### **Permeability:**

Within the planning I see very little by way of uncovered land, where is all the water going to go? Water that would normally penetrate the soil layers? The covering of a floodplain with buildings and associated infrastructure removes a significant (almost all) of the natural permeability that currently exists. During the wetter months the land here is heavily pooled, I see no guarantee (nor can there be one) that the drainage plans will offer full protection from flooding. The flood defences can only do so much and to permanently remove permeability is wholly questionable and cavalier.

Replacement of the grassland/floodplain with concrete including piling will add to climate change issues, we need to start using our planning mechanisms to reduce the impact of climate change. There needs to be a clear and unequivocal investigation into the Floodplain Classification zones on this site - It's as simple as A. B or C yet seems to be a Pick N Mix scenario.

### **Bats & Badgers:**

Protected are they not?

I read recently of a proposal in Raheny being turned down as a result of the Light Bellied Brent Geese and no guarantee the development would not impact upon this migratory species overwintering.

At this point it is worth noting the dates of the wildlife surveys, with the latter being July 2022. I see no assurance that over-wintering birds have been assessed. Impossible when a survey was conducted at a time when Brent Geese for example would be in the ~~Arctic Tundra~~. I am

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aware of these geese at several locations in North Dublin and also here in the south greater Dublin area e.g. Dun Laoghaire Rathdown.

If protection is afforded to the Brent Geese, we need our planning body to view the presence of several bat species at this site as significant and a serious matter in terms of the protections they are afforded under legislation and in our current Biodiversity Crisis.

The same goes for the badger population frequenting and likely living in this quiet, naturalised location.

### **Lamprey and Salmonid:**

The River Dargle is home to 3 Lamprey species and Salmonids. I view no assurances or guarantees that the works and development will have zero impact on these important and protected species.

Page 36 of the development's Natura Impact Statement is alarming.

More so for me on a professional level having worked with the Inland Fisheries Sector in Catchment Management and Fisheries Protection.

"There is potential to impact the water quality of the River Dargle, and the water quality coastal waters from untreated and uncontrolled storm water/surface water drainage discharge. "

"Whilst the potential for storm water drainage impacts to the surface water quality of the River Dargle/Irish Sea are considered to be low, given the dilution and dispersal that would occur within these waterbodies in the absence of mitigation measures potential impacts to the surface water quality

of the River Dargle and Irish Sea, which in turn could affect Q1 species, Harbour Porpoise, cannot entirely be ruled out".



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Mitigation measures are listed at 6.3 - however my view as an environmental manager and national work in fisheries catchment management no mitigation measure can truly reduce the risks to result in no impact, nor an assurance it will be correctly policed.

Note: I see no mention in the aforementioned of the damage to the salmonid species and Lamprey species.

EPA State of the environment released in 2022 - This needs to be considered and included in any current planning application.

### **School proximity and child protection:**

The development is proposed at a site adjacent to two schools, what message does this send out? Also with regard to the school setting, a concern is the extent to which both schools will be overlooked by this development, in terms of children and students being observed at play and during their recreational time? I see no mention of this issue in the planning documents.

### **Schools:**

The reports within the plan are relying on 2016 census data. The more recent CSO figures need to be accessed and used in 2022. A 5 year old data set is a best useful and at worst 'convenient', notwithstanding projections to 2051.

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The class and school sizes presented appear reasonable, however the class sizes are based on the 2018/2019 and 2019/2020 numbers. Some of these have reached the optimal class size of 28, to increase local numbers will have the knock on effect of swelling these class numbers into the 30's and in some cases will require a school to look for additional teaching and SNA staff and or a build on extension.

### **Traffic:**

While the figures presented on schools detail the distances, I believe these distances to be incorrect, if you look at Section 5.1 page 14 of the Schools report, taking for example the site to Scoil Chualann the given distance (walking) is 1.5 km, however plotting this from the mid point of the site to Scoil Chualann I am getting a walking distance of 2 Km. (Bray School project for example is correct).

In terms of distances, it is all too convenient to give the walking distances. The real walking time of these will demonstrate the barrier to walking, if we take Bray School Project at 2.9 Km and using the HSE estimated walking time of 12 minutes per kilometre that leaves a daily walking commute time of just under 36 minutes. Programmes such as Green-Schools Travel work with schools across Ireland and with designated schools working on 'Travel'. Their work is essential in encouraging children and parents to eschew the private car trip and walk.

The question here is how can Ballymore ensure that primary school children who could potentially attend any of the listed schools actually walk to school when we have national programmes that work hard to

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encourage people to consider walking when the evidence is that many live within 1 kilometre.

To list schools within 3 km and without delving into and providing the travel distance by car and the real journey time at peak school and commuter times is a huge gap in information.

The reality is the default choice for travel to school will be the private car, especially when the distance is above 1 km.

This proposal will significantly impact and cause issues on local journey times in Bray as a result of increased school traffic.

This proposal will significantly add to reduced air quality for local routes as a result of increased car use on the 'School run'.

Realistically only one school offers a realistic walking option and one school will not be sufficient to cope with the intake from a 12 storey development.

### **Childcare facility:**

The proposal includes a childcare facility. The reality is increased traffic again at peak commuter hours and at school drop off for the Ravenswell schools.

A childcare facility usually has a high level of private car drop offs and collections. The facility will result in increased traffic and the inevitable

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behaviour of footpath/pedestrian and cyclist infrastructure being utilised for the drop-offs and collections.

### **Traffic increase:**

In Bray the traffic is a daily topic and contentious issue.

The traffic situation is already unsustainable.

This development will increase the traffic issues.

The increases will impact upon the current residents in terms of their access and exit from their homes in a timely fashion.

The increases will impact upon amenity and recreation in the Ravenswell, Little Bray and Harbour/Seafront area.

This development by virtue of increased traffic (during development) from residents' vehicle ownership will further deplete the urban air quality levels in Bray and this includes particulate matter from car tyres (just in case the entire development were to own electric vehicles!).

This development's glossy graphics show cyclists on bicycles on the right hand side of the road.....if graphics are erroneous, if school walking distances are erroneous - what else is erroneous?

### **Transport Infrastructure:**

This planning application refers to the Luas? Is this fact?

This planning application looks as if the proposed new road and bridge (currently subject to judicial review) is a certainty?

### **Green Spaces:**

People need Green-Spaces.

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This development will annihilate a Green Space. Why? Planning needs to protect the last of the green spaces in urban environments, not least for human health, mental health and well being and children's access to nature.

### **Otter:**

While personally preferring not to draw attention to the otter population here, the glossing over of the otter within this proposal is remiss and needs to be raised.

Otters are frequently sighted, especially at dusk on the harbour slip.....

### **Climate Change:**

This alone is a planning alarm bell. We need planning now more than ever to protect.

We need development on Brown field sites, not on floodplains that serve an important function.

We have no guarantee of the impact of sea level rises on this coast.

Enough is enough.

## **5. Grounds**

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## Supporting materials

6.	<p>If you wish, you can include supporting materials with your observation. Supporting materials include:</p> <ul style="list-style-type: none"><li>• photographs,</li><li>• plans,</li><li>• surveys,</li><li>• drawings,</li><li>• digital videos or DVDs,</li><li>• technical guidance, or</li></ul> <p>other supporting materials.</p> <p>If your supporting materials are physical objects, <b>you must send</b> them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.</p> <p><b>Remember:</b> You can insert photographs and similar items in part 5 of this form – Observation details</p>
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## Fee

7. You **must** make sure that the correct fee is included with your observation.

**Observers (except prescribed bodies)**

strategic housing observation **only** is €20.

strategic housing observation **and** oral hearing request is €70

## Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

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**No, I do not wish to request an oral hearing**

☐

## Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

the case number and your name, or

the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



**For Office Use Only**

<b>FEM – Received</b>		<b>SHU – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**