

Fwd: Coastal quarter bray

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From: **rachel gibney** <rachel.gibney@shankill.ie>

Date: Mon 31 Oct 2022 at 09:03

Subject: Coastal quarter bray

To: <appeals@pleanala.ie>

Dear Sir or Madam,

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

In this Observation, I will concentrate mainly on the interdependence between this application 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 suspension bridge: *this proposal is at present the subject of a Judicial Review*. I would also like to submit my concerns about the contradictions between Shankill Investments' application and Bray's LAP 2018 regarding the zoning on these lands. As that will form the shortest part of my Observation, I intend to address that first.

1) Coastal Quarter SH2 Flood Risk Assessment at:

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

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."

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. It fails at 2 (v) as, if there is a substantial Flood Zone C within the site, and a Flood Zone B, then Flood Zone A should be avoided altogether. It also fails at 3, if a rudimentary mistake like this has been made in the Council's Flood Risk Assessment of the site.

If Shankill Investments' flood zoning is correct, however, then it is not in line with Bray's LAP 2018.

In either scenario, Shankill Investments' application fails on flood zoning.

Shankill Investments' application assesses the low ground (below the present schools' road) as Flood Zones A and B. Bray's LAP 2018 agrees.

2) Proposed Access Road across Flood Zones A and B:

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. Surprisingly, BordPleanála's Inspector agreed with that assessment, despite the fact that Wicklow County Council are maintaining in their Part 8 proposal that the lowland of the old Bray Golf Club lands is a Flood Zone C, while Bray's LAP 2018 Flood Risk Assessment assesses that land as Flood Zones A and B – another direct contradiction in our local authority's flood risk

assessments. The decision by An Bord Pleanála is the subject of the Judicial Review.

Shankill Investments claim that their application is 'stand-alone', yet their drawings, their graphics, and their text give the lie to this claim. In particular, their proposal on page 77 (graphic on page 78 at Fig. 18) of their Flood Risk

Assessment shows an intention to actually build 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."

This a) simply assumes the access road will go ahead, with some contempt for the judicial process surrounding it; and b) shows no regard for the danger building up the ground level across the floodplain might cause for a very vulnerable community living upriver.

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.

It is replaced in this application by the frontage of Block C, adjacent to the Orchard, and Block B2, adjacent to the

railway underpass. See Block C, South Elevation, and Block B, South Elevation, at

[https://coastalquartershd2.com/wp-content/uploads/2022/documents/Drawings/Architecture/BRA-GHA-ZC-ZZ-DR-A-05240%20-%20Block%20C%20-%20Elevations%20\(Sheet%201%20of%202\).pdf](https://coastalquartershd2.com/wp-content/uploads/2022/documents/Drawings/Architecture/BRA-GHA-ZC-ZZ-DR-A-05240%20-%20Block%20C%20-%20Elevations%20(Sheet%201%20of%202).pdf) and

[https://coastalquartershd2.com/wp-content/uploads/2022/documents/Drawings/Architecture/BRA-GHA-ZB-ZZ-DR-A-05221%20-%20Block%20B%20-%20Elevations%20\(Sheet%202%20of%202\).pdf](https://coastalquartershd2.com/wp-content/uploads/2022/documents/Drawings/Architecture/BRA-GHA-ZB-ZZ-DR-A-05221%20-%20Block%20B%20-%20Elevations%20(Sheet%202%20of%202).pdf) respective

y.

Block C contains at ground floor level a childcare facility, a café, and a shop, with the latter two fronting onto what is at present a public road, while the entrance to the childcare facility is just around the corner. Block B2 contains a gym and juice bar at ground and mezzanine level.

In front of Block C, crossing the public road and descending onto Flood Zone B below, is the Market Square, while a Plaza area fronts Block B2, again on what is still, and may well remain, a public road.

That road culminates at the railway underpass, which is described in this application (page 45) at

<https://coastalquartershd2.com/wp-content/uploads/2022/documents/Reports/Architecture/Architectural%20Design%20Statement.pdf> as the ‘Underpass Entrance Node’. It states:

“This character area *has been created by the removal of the existing access road to the underpass and replacing it with a plaza area* that marks the entrance to the proposed

development for pedestrians and cyclists travelling to and from the harbour and beyond to Bray Town Centre. The plaza also provides connection with the existing cycle path from the harbour, creates a setting for the commercial unit

on the southern elevation of Block B and provides a connection point between the northern and southern portions of the Coastal Gardens walkway.”

The proposed changes to this area - by the developer - are described earlier in the same document, on page 14, as follows:

“To the south eastern corner, the entrance to the coastal path has been substantially increased to create a more inviting gateway from the railway underpass into the Coastal Quarter. The pedestrian underpass is considered one of the key gateways into the scheme and is therefore the location of the ‘landmark’ taller element of the proposed scheme. At ground level the visitor is greeted by a double height space on the corner with a juice bar at ground level and gym at 1st floor/mezzanine level. These two uses will ensure continuous activity at this key location. Tables and chairs on a south facing outside terrace associated with the juice bar will further animate this space.”

The last paragraph on the following page (15) gives the height of this ‘landmark’ taller element of the proposed scheme as 12 storeys. This can be seen on the Block B, Southern Elevation drawing, referenced above on my page 4.

The interconnection between the proposed changes at the railway underpass and Block B2 are explained on page 23 of

<https://coastalquartershd2.com/wp-content/uploads/2022/documents/Reports/Landscape/6948%20-%20LANDSCAPE%20DESIGN%20STRATEGY%20REPORT.pdf>

as: “the footprint of Block B has been redesigned to create a wider access route from the existing underpass as part of the Entrance Node on to the Coastal Gardens route.”

These changes are illustrated in a graphic on page 14, in the same document.

The text accompanying that graphic repeats the statement made on page 45 of the Architectural Design Statement, regarding the removal of the existing access road to the underpass and replacing it with a plaza area “.

That this section of presently public road is intended, within this application, as a very social space, is obvious from the text on page 25 of Architectural Design Statement:

“The proposed development encourages social relationships and the culture of sharing spaces and functions. The layout has been arranged so that the community elements (the childcare facility, the cafe and the convenience store) form the ‘public front’ of the scheme to the south. These important elements front onto the ‘Market Square’. This public space forms the main entrance to the proposed development and will be a lively space accommodating outdoor seating for the café and incidental play areas for children coming from and going to the adjacent childcare facility and schools. It is intended to host weekend farmers markets and other events.”

Because this proposed Market Square not only crosses the public road, but then descends onto Flood Zone B, it is difficult to ascertain where exactly the proposed farmers market and other events will be held – on the public road or the low ground or somewhere in-between on the ‘series of three terraces’ described below on page 45 of the

Architectural Design Statement:

“The Market Square is a key node within the overall Harbour Point masterplan and the key public space within the Coastal Quarter. This mainly hard surfaced plaza area will provide an external community space for artisan markets, seasonal community events and as a breakout seating

space to be used by the commercial premises within the ground floor of the adjacent apartment buildings fronting onto the square. In order to deal with topography in this location, the square will be set out as a series of three terraces linked by a fully accessible feature walkway.”

There are multiple graphics and references to the social aspect of this proposed Market Square and its hard and soft landscaping (and indeed to the proposed Underpass Entrance Node and Block B2) throughout the Architectural Design Statement (including pp25, 32, 35, and 40). Again, however, there is no clarity regarding where – within the Market Square area, from the schools’ road down to Flood Zone B – these activities are planned to take place.

Clearer is their repeated intention to make a separate application to construct a very extensive building, referred to variously as a ‘Feature’, ‘Landmark’, or ‘Special’ building, on Flood Zone B, thus putting a very non-water compatible element into the Coastal Garden applied for here.

This Landmark building is illustrated, and its extent shown, in the graphic at Page 80 of their MasterPlan - Market Square and Coastal Gardens at

<https://coastalquartershd2.com/wp-content/uploads/2022/documents/Reports/Other/Harbour%20Point%20Bray%20Masterplan.pdf>

Again there are multiple references to this proposed building within the present application’s documentation, e.g. the Architectural Design Statement at page 32 and the Landscape Design Strategy report at page 24.

To claim that the changes proposed along the present schools’ road have nothing to do with the proposed access road that is the subject of a Judicial Review is simply ludicrous, 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, just as their Master Plan is inextricably linked with this present application.

Summary:

- 1) This application is inextricably linked with an access road that is presently the subject of a Judicial Review, and cannot therefore go ahead until this has been decided.
- 2) This application should fall on Flood Risk Management as there is a direct contradiction between their assessment of flood risk on the high ground and that on which Bray's LAP justifies building on this site at all.

3) Shankill Investment's application for the southern part of their site, from and including the present schools' road, does not take into account, as required, an increased flood risk to already established communities.

4) I would like to add that my objection isn't a case of not in my backyard etc, I'm well aware that homes need to be built, but not vast swathes of buy to let properties at the expense of the environment. There are huge tracts of land on the boghall rd, but admittedly they don't have the sea views. 12 storeys on that site will forever ruin the landscape for future generations. Bad planning should not be a response to a housing crisis.

Yours sincerely,

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ReplyForward