

41 The Green
Woodbrook Glen
Bray
Co. Dublin

Dear Sir / Madam,

I am writing to submit my observations on the proposed development by Ballymore Homes of the former Woodbrook Golf Club lands - "Coastal Quarter Bray SHD 2" (Case Ref. TA06D.314686).

I recognise that this land is zoned for mixed use development; however my observations are based on some concerns about the proposed development's impact on surrounding amenities, its impact on the local environment, and physical and mental health of local communities. My belief is that the scale of the proposed development is larger than optimal for both current and future residents of the area and site itself.

My concerns include the following:

Impact on Corke Abbey Valley Park

The impact of the proposed development on the adjacent Corke Abbey Valley Park in the EIAR is very limited. While some issues are touched on, e.g. impacts on water quality in the Rathmichael Stream is considered to some extent – others are not. Corke Abbey Park is home to a range of important species, including (but certainly not limited to) badgers, Leissler's bat (the Irish population of which is considered of International Importance) and shows evidence of use by otters.

The proposed development would result in both a substantial increase in population (of humans, and likely also of pets) coupled with the loss of the area as a space for recreation and dog walking (for which it is widely used as noted in the SHD application itself). It must be assumed that Corke Abbey Valley Park, therefore, will bear the majority of the impact of this increase in both human and canine use. Regrettably this could also lead to increased litter or other antisocial uses also – again, harmful to wildlife.

Corke Abbey Valley Park is home to at least one active badger sett and the impact of the SHD on badgers is described, even with mitigation, as moderate and negative – however I do not think this assessment bears in mind the cumulative impact of both the SHD being built and the associated impacts on the park itself. Neither are the current works in the park being undertaken by Dun Laoghaire Rathdown (which have recently commenced – see "Corke Abbey Valley Masterplan" on the DLR County Council website, along with associated public consultation which highlighted the value of the nature in the park to its users) included in the "Cumulative Effects" section of the EIAR. Therefore I would ask that these should be fully considered, bearing in mind the legal protections afforded to these species, prior to approval being considered.

Coordination with Forthcoming Recommendations and Requirements for Biodiversity

The new draft National Biodiversity Action Plan highlights the need and intention to adopt new strategies to tackle biodiversity loss, including much greater emphasis on the restoration of degraded ecosystems, and not only the preservation of pristine ones, as summed up in the excerpt below (emphasis mine):

“This “post-2020” strategy **is focused on adopting a new framework** to better address the biodiversity crisis with a renewed focus on transformative actions that can be taken across all areas of society to halt the loss of biodiversity and **reverse its loss and restore degraded ecosystems**. This new strategy, called the Global Biodiversity Framework, **recognises that despite three decades of co-ordinated global action for conservation, the loss of biodiversity continues, posing significant threats to human well-being.**”

The new draft states that “Local Authorities will work to identify and respond to opportunities for enhancing the biocultural value of green and blue urban environments (GBUE) through appropriate design strategies, the use of visual and performing arts, and enhancing equity of access and promoting use of GBUE by community groups, and integrating cultural ecosystem services in local biodiversity action plans” (action 3A4). It also highlights the requirement to “incorporate biodiversity considerations, particularly the value of cultural ecosystem services to mental health and wellbeing, into the forthcoming National Outdoor Recreation Strategy” by 2023, in recognition of the enormous impact of green spaces on mental and physical health.

There is NO other site in Bray with such potential in terms of biodiversity and placemaking together; I hope that the value and opportunity to be forward thinking and set an example will not be missed when considering the use of the land and the balance between space allotted for nature and open space versus that for development. I recognise that the proposal claims that biodiversity will not be harmed by the development (though there are aspects of this about which I have concerns) – but how much more could it contribute with a greater focus on outdoor space, in balance housing? I am particularly concerned that the Coastal Gardens, on which much of the biodiversity claim rests, are even in these documents designed to be destroyed by the “Landmark Building”.

I therefore urge all stakeholders to consider the value of the site not only in terms of housing (and I recognise the human and economic cost of the housing crisis) but also for its value as a unique site – beside the coast, adjacent to species-rich woodland, and within reach of a major urban centre (not to mention immediately beside schools catering to hundreds of children who would stand to benefit from greater public and natural open space).

Traffic and Transport

Concerningly, the development seems to rest on transport developments that may not ever happen to accommodate the increased population associated with the development.

Firstly, statements such as “The existing high capacity public transport services and the planned improvements, including Bus Connects and Luas extension shall provide for this population growth” (EIAR lay summary) imply that these developments – neither of which is confirmed for Bray – will be key to facilitating the development.

Secondly, the drawings associated with the SHD application are centred very much around a road leading to the proposed Bray Sustainable transport Bridge which is currently the subject of a judicial review. It would appear reasonable to await the outcome of that review before finalising a decision on these plans.

Aside from these considerations and the fact that speculative planning is a poor practice, the Environmental Impact Assessment Report (EIAR) for the development itself notes that the junction of R671 Dublin Road, Old Connaught Avenue & Corke Abbey Avenue “is expected to operate over capacity during both peak hours” even without development, and to increase a further 5.5% due to the proposed development. I ask for the impact of this on all those Bray residents and visitors, particularly when the newly-opened Bray Central etc. may increase volumes further but have not been considered. I would ask that these further cumulative impacts be factored into the decision.



The site, showing a biodiverse greenfield site adjacent to the coast and close to the town centre

Placemaking and Visual Amenity

Aside from the placemaking opportunities afforded by greater use of the site for nature and open space (coupled with greater incentive for brownfield sites to be infilled to compensate for lower residential unit numbers), I observe that the new design – while changing some colours and balcony designs – does not mitigate the visual impact of blocks A and B from the harbour and coastal path, thereby still causing substantial character change to the North Beach where significant work on coastal preservation is current in progress. While visual amenity is to a degree subjective, I do not

understand how the proposed design lessens the visual impact which lead to the original split decision.

Local access

Aside from my above observations relating to the development itself, I request making retention of pedestrian access to the seafront throughout the entire process a condition for any development on this land. This access is invaluable to local residents from a variety of perspectives, from access to the town to mental and physical health.

Summary

The development of the land with so relatively little open space, and high-rise buildings positioned adjacent to the seafront, seems to me a great missed opportunity for Bray. A well-planned, forward-thinking development with a much larger area dedicated to open space and recreation (with some housing and associated facilities such as café's etc) would:

1. Allow Bray to be a landmark example of sustainable land use and urban development, in line with forthcoming requirements and recommendations
2. Attract customers and visitors to enjoy the unique views and amenities, with associated economic value
3. Better protect local wildlife, and truly enhance the ecological potential of the site for both humans and nature
4. Help to avoid potential flooding issues for residents of the site and surrounding areas
5. Enhance the mental and physical wellbeing of all users, with amenities for play and exercise (and is in a perfect location for this, next to the schools and close to the Harbour)

There is no other site in Bray with this potential, and it could play an enormous and key role in "Healthy Placemaking" in Bray as a key goal outlined in the draft Wicklow County Development Plan 2021-27. I hope the opportunity will not be lost to develop the land that Bray can be proud of, for generations to come.

Kind regards,

Rachel Immel