

File With _____

SECTION 131 FORM

Appeal NO: ACP 500165Defer Re O/H ☐Having considered the contents of the submission ~~dated~~ received 26/11/25
fromNicoleen McNamee I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): no m plan onlyE.O.: Las PungDate: 26/11/25

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ACP _____

M _____

Please treat correspondence received on _____ as follows:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with BP _____

3. Keep copy of Commission's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Commission's letter ☐

Amendments/Comments

4. Attach to file(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☐Plans Date Stamped ☐Date Stamped Filled in ☐

EO:

AA:

Date:

Date:

Miscellaneous

Page 1 of 1

Correspondence Coversheet

Case Number
PL-500165-WW

Case Priority
Normal

Case Lodged On
24/10/2025

Case EO
Catherine Flynn

PA Reg. Reference
2560207

Case Details

Planning Authority
Wicklow County Council

PA Reg. Reference
2560207

Summary Description

Mixed use development, comprising of residential units and commercial spaces and all associated ancillary site works.

Site Location

Site largely within the Former Bray Golf Course Lands , Off Ravenswell Road and Dublin Road , Bray

Correspondence Details

Issue
BP20 — English

Participant
Noeleen McManus

Representative
—

Response Date
Applicable
☐

Number of Days
Allowed
—

Keep Copy of Letter
☐

Return Docs
☐

Keep Envelope
☐

Comments
—

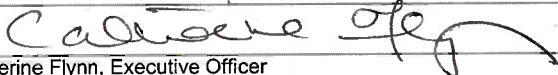
Filing

Attach to File
☐

Return to EO
☐

Signatures

Signed

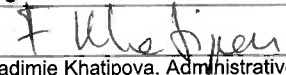


Catherine Flynn, Executive Officer

Date

25/11/2025

Signed



Fadimie Khatipova, Administrative Assistant

Date

26/11/20

From: Appeals2
Sent: Monday 24 November 2025 16:52
To: Catherine Flynn
Subject: FW: Wicklow Co. Co. PA Ref. 25.60207/ACP Ref. PL27.500165 - Noeleen McManus

From: Noeleen McManus <noeleenmcmanus@gmail.com>
Sent: Monday, November 24, 2025 3:55 PM
To: Appeals2 <appeals@pleanala.ie>
Subject: Wicklow Co. Co. PA Ref. 25.60207/ACP Ref. PL27.500165 - Noeleen McManus

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Comment on Appeal by Marcia Nicholson:

re: Context of Flood Risk and Climate Resilience (Part 5), page 4 from that appeal:

A chairde,

I believe that the reference to flooding in '2024' in Part 5, page 4 of the above appeal, was an obvious minor over-editing typo within a paragraph about national flooding and climate resilience. The clarification below reflects the intended national context, expands on this section of Part 5 in full for clarity, and does not in any way affect the integrity of the document as a whole, with or without this clarification.

It relates to the wider pattern of significant flooding recorded across Ireland during 2024, as evidenced in national reporting and in Met Éireann's Annual Climate Statement 2024. These events illustrate the increasing frequency, severity and unpredictability of inundation associated with climate change, which forms part of the wider context required for informed planning decisions on development within mapped floodplains. This national flooding context was included to support the subsequent points raised in Part 5 regarding the need for climate adjusted projections, safe emergency access during extreme rainfall and fluvial events and the displacement of water volumes where urbanisation expands within a floodplain, as set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Established hydrological understanding confirms that infill, hard surfacing and ground raising within or near a floodplain can displace water into surrounding areas and increase residual risk elsewhere. Recent flooding patterns in Ireland have already exceeded some earlier expectations, particularly in the case of compound events and short duration high intensity rainfall. For this reason, intermediary mitigation measures should not be assumed to be sufficient and any proposed mitigation requires particular care, as emerging climate behaviour indicates that future events may surpass established modelling.

National Climate Evidence Supporting Part 5

The wider national evidence supporting the 2024 reference is taken from the Climate Change Advisory Council (2025) publication Our Changing Climate in 2024: Annual Review 2025. The Annual Review notes record breaking rainfall in 2024, the sixth wettest spring on record and severe flooding associated with Storm Bert in Counties Donegal, Kerry, Cork, Limerick and Galway.

Storm Darragh, the strongest storm since 2020, caused major flooding and extensive disruption in December 2024, leaving three hundred and ninety five thousand premises without power and affecting communication networks, water treatment systems and supply chains, including through damage at Holyhead Port. A World Weather Attribution study confirmed that heavy rainfall and flooding between October 2023 and March 2024 were made twenty per cent heavier and more frequent due to human caused climate change, with events that previously occurred every fifty years now expected every five years.

The Annual Review further notes that flooding already costs Ireland an average of one hundred and one million euro annually, that severe events can reach up to five hundred and ten million euro every twenty five years and that one in twenty buildings already experiences difficulty securing flood insurance.

Met Éireann's Ireland's Climate 2024 report reinforces these findings and highlights the growing need for stronger climate resilience and flood defence measures. Seasonal and monthly rainfall anomalies, particularly in the south and east, show increasing variability and severity, adding further unpredictability to flood behaviour and leaving floodplains increasingly vulnerable and unsuitable for development. The report also notes a seven per cent rise in rainfall over recent decades and an increase in extreme weather events, including seven named storms in 2024, which together highlight the accelerating pace of climate related flood risk.

Conclusion

The Climate Change Advisory Council's findings, together with the evidence from Met Éireann's Ireland's Climate 2024 report, reinforce the concerns raised in Part 5. They show that flood risk in Ireland is intensifying through heavier and more frequent rainfall, increasing variability in seasonal and monthly precipitation and a marked rise in extreme weather events, including seven named storms in 2024. They demonstrate that climate driven flooding is becoming more unpredictable and more severe and that hydraulic modelling must incorporate climate adjusted projections rather than rely on historic patterns that no longer reflect current conditions. The national climate findings support the Part 5 points concerning residual risk, emergency access, compensatory storage and sustainable land management. They indicate that development on the old Bray Golf Club lands would heighten exposure to flood impacts in an already sensitive catchment and would run contrary to emerging national requirements for climate resilience, insurance viability and public safety. They also show that such development would undermine the broader national aim of preventing maladaptation, avoiding new flood liabilities and ensuring that land use decisions do not increase residual risk for households, critical infrastructure or the wider community and can reasonably be expected to expose the area to avoidable long term vulnerability as climate pressures continue to intensify.

References

- Climate Change Advisory Council (2025) Our Changing Climate in 2024: Annual Review 2025. Available at: <https://www.climatecouncil.ie/councilpublications/> (Accessed: 19 November 2025).
- The Planning System and Flood Risk Management: Guidelines for Planning Authorities, (2009). Available at: 2009-Planning-System-Flood-Risk-Mgmt-1.pdf

- Met Éireann (2024) Annual Climate Statement 2024. Dublin: Met Éireann.
 - Wicklow County Council (2025) Appeal against decision: Ballymore Sea Gardens Phase 2 – Section 5, page 4. Bray: Wicklow County Council.
- Available at: <https://wicklowcoco.eplanning.ie/idswebDPSS/ViewFiles.aspx?docid=662111&format=djvu> (Accessed: 19 November 2025).

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24th November, 2025

