

File With _____

SECTION 131 FORM

Appeal NO: ACR PL-500165-WWDefer Re O/H ☐Having considered the contents of the submission dated/ received 23/11/25
fromRachel Gibson 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 material changeE.O.: [Signature]Date: 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: _____

CORRESPONDENCE FORM

File With _____

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 Board's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Board'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
Rachel Gibney

Representative
—

Response Date
Applicable
☐

Number of Days
Allowed
—

Keep Copy of Letter
☐

Return Docs
☐

Keep Envelope
☐

Comments
—

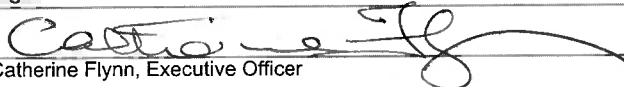
Filing

Attach to File
☐

Return to EO
☐

Signatures

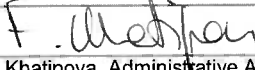
Signed


Catherine Flynn, Executive Officer

Date

25/11/2025

Signed


Fadimie Khatipova, Administrative Assistant

Date

26/11/25

23

From: rachel gibney <rachelggibney@gmail.com>
Sent: Sunday 23 November 2025 23:13
To: Appeals2

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 Third Party Appeal by Noeleen McManus:

Re: Wicklow Co. Co. Planning Ref. 25.60207 and An Coimisiún Pleanála Ref. PL27.500165:

To the Planning Appeals Administrator,

As a resident of Seapoint Court, and therefore very familiar with the existing traffic and road safety issues in our area, I wish to comment on the traffic and road safety aspects of the above Appeal by Noeleen McManus.

I intend to do so by contrasting views expressed by one of your Inspectors in relation to an application on July 25, 2008 - [An Coimisiún Pleanála](#) - for development on the former Bray Golf Club lands with very recent statistics given by the Alliance of Bray Residents (ABR), a network of over 27 residents' groups throughout Bray. Our residents' association belongs to ABR, and I would like to support their submission to Wicklow County Council, regarding Shankill Property Investment's Phase 2 application on the same site to which the Inspector referred some seventeen years earlier.

Alliance of Bray Residents (ABR) Submission: 22nd April, 2025:

Quoting Census 2022, ABR gives a figure of 11,935 housing units in the census town of Bray. Their Table 1 shows a total of (named) "additional residential units completed and in the pipeline for Bray (excluding infills)" as 4,806, including Sea Gardens Phases 2 and 3. This means an increase of more than 40% in the next 2 to 4/5 years, if the applicant's proposals go ahead.

Noting that this figure "does not include significant tranches of development in Dun Laoghaire Rathdown which will impact on Bray", they go on to name:

- ☐ the Woodbrook-Shanganagh Local Area Plan 2017-2023 as envisaging "up to an additional 2,300 residential units, and the construction of a very large housing development at Shanganagh Castle, which is currently underway";
- ☐ significant additional housing in Dun Laoghaire Rathdown along the Ballyman Road axis to the north of the new development in Fassaroe; and
- ☐ future commercial/ retail development in Bray (e.g. nursing home on the old Dell site and the 5-acre site on the Southern Cross recently sold for industrial development).

Critiquing the “time horizon for the transport options” for the proposed development, they maintain these will be in place “long after the Sea Garden Phase 2 is a new community”, as follows:

- DART+ (giving extra capacity on the rail line) is at “early stages”;
- Bus Connects, especially the E1 and E2 routes passing Sea Garden, are not optimal, as the CPO to build the bus lane in Little Bray has only just been approved and there is no timeline for acquisition of the properties affected and construction of the bus lane;
- The Greater Dublin Area Cycle Network is not in place, and no significant work on its development is taking place in Bray, to and from the town;
- The extension of the LUAS to Bray will be “after 2035”;
- The proposed public transport bridge (“Swan Bridge”) across the Dargle near the railway bridge is under judicial review, and is likely to have to be redesigned to garner any level of public acceptability.

I do not intend to go on quoting the ABR submission verbatim, other than the following two paragraphs:

"The applicant assumes that the J4 - J14 upgrade of the M11-N11 (Loughlinstown to Coyne's Cross) is in the course of planning, rather than the interim bus priority scheme from the Glenview junction to Loughlinstown which is currently being consulted on. The interim bus priority scheme is designed to give relief to commuters further south in County Wicklow along the N11/M11, and explicitly states that the buses on this route will not serve Bray."

And

"The only vehicular access to Sea Gardens is off the Dublin Road in Little Bray. This road is chronically congested and wholly inadequate for the current levels of traffic, let alone the additional movements to and from the 1,600 parking spaces envisaged being provided (532 in the current application)."

The image on the right shows traffic approaching the Fran O'Toole bridge from the north on the 22nd November last, and up into the town centre: the traffic was backed up northwards as far as the Wilton roundabout, which had turned into a carpark at that stage, because of the difficulty of accessing the Dublin Road into Bray. Cars turning onto the Upper Dargle Road at Ravenswell were exacerbating this backup - a typical rush hour scene on Dublin Rd/Castle



Residents in our area, and I am sure in the rest of Bray, were relieved to hear that a Transport Committee has been set up by Bray Municipal to study how best to deal with the appalling congestion in our town, particularly at weekends and special festivals.

At those times the nightmarish queues of traffic – over 80% local during the week – is added to by (welcome) visitors to our town, on whom many of our businesses depend for their livelihood.



The photograph on the left shows what Seapoint Road looks like during a sunny weekend, or at festivals, such as St. Patrick's Day or the Air Show. *SeapointCourt's only entry or exit is on the left at the bottom of the hill, between the railway bridge and Seapoint Road.*

It is already extremely difficult, and dangerous, to use this access at present, but, with a proposed public transport bridge landing right beside our estate, it will become impossible, especially with the inevitable additional vehicular traffic into and out of Sea Gardens, along with the residential units completed and in the pipeline for Bray and Dun Laoghaire/Rathdown.

As ABR says in their submission: "Without a broader vision, shoehorning traffic generated by Sea Gardens Phase 2 into the existing road and sustainable transport networks will lead inevitably to further congestion in Bray."

It is interesting to look at the contrast – and the similarities – between the Inspector's Report over 15 years ago ([Microsoft Word - r230246.doc](#)) on Pizarro's application, and the figures contained in ABR's submission.

While I could not find the number of housing units for Bray in the 2006 census (complicated by the fact that Bray town boundaries have changed), it is obvious that its population has grown exponentially – and, consequentially, its traffic. Yet the concerns expressed about traffic even then, officially and by private citizens, seem very much the same.

In his Report at [Microsoft Word - r230246.doc](#) Inspector Stephen Kay refers on p11 to Bray's Town Engineer's internal report as follows:

"...further proposals for the Upper Dargle Road are required as the current proposals understate the impact on this section of road. The impact of the development on the N11 between the Fassaroe and Killarney Road junctions is [also] highlighted. Subsequent report considers that Clarification of FI still required on a number of issues. NRA growth factors used appear to be understated. The assumed saturation flows are excessive. Trip rates used in TRICS appear low. Impact of LUAS priority on junction operation and timings should be further assessed. Capacity assessment of Upper Dargle Road would not appear to take account of accesses and parking along route."

The Inspector returns to the Town Engineer's concerns on p55, at 10.5.6.2:

"The location of the site relative to its catchment to the south of Bray will effectively mean that the N11 will act as a by pass/ access road for traffic rather than accessing the site via the town centre. This impact is essentially limited to the Fassaroe and Southern Cross access junctions and would potentially add significant traffic volumes to the north bound carriageways of the N11 at this location. This potential impact on the N11 was identified as a concern by the Bray Town Engineer and the Board requested the comments of the NRA with regard to this potential impact and any suggested mitigation measures however no response was received. The potential mitigation measures would essentially involve the increase in width and capacity of the road from two lanes to three in this section. No such proposal has been made by the NRA or by the first party and there is no indication that the first party would be willing to accept a condition to this effect. The comments of Mr Danny O'Connor on the traffic implications of the proposed development on the N11, which despite recent slight reductions in traffic volumes remains beyond capacity, are noted and in the absence of any proposed mitigation works for the relevant section of road I would agree with the recommendation that permission should be refused on the basis of negative impact on the carrying capacity of a national road."

Mr Daniel O'Connor's Report on 'Traffic Issues Relating to the Pizarro Development, Bray Golf Course Site' is noted as Appendix B, but unfortunately is not attached online, nor indeed is Appendix B – the Report of Professor Michael Bruen on 'Hydrology Aspects of the EIS for the Proposed Development of the Golf Club Lands in Bray'.

With reference to the lack of response by the NRA, the Inspector had already noted under External Referrals at 5.2 on p11:

"Submission received from the NRA stating that the authority will rely on the Planning Authority to abide by national policy. The Board further referred the application to the NRA drawing attention to the potential impact of the proposed development on the operation of the N11 and, in particular, the effective use of the N11 route as a connection from the south side of the town. The NRA responded to state that they have no comments to make on this application."

The NRA are also referred to in an internal report from the Roads Section of Wicklow Co.Co., referred to by the Inspector on p11:

"That the reduction in NRA predicted traffic growth rates by a third on the basis of traffic generated by the development itself as set out in s.5.8.2.5.5 of the EIS is not accepted and analysis should be revised to use higher growth figures. Works to the Fassaroe Interchange are not detailed and it is indicated in the figures that WSP Report as having a very significant impact on reducing queuing that would occur without these works. Details of works are required. Measures are also required to mitigate the projected increases in queue length on the N11 and Southern Cross slip roads."

The big concerns about traffic, and infrastructure not being completed nearly as quickly as forecast, was already there – over 15 years ago, e.g. "Subsequent submission states that the Dublin Road Upgrade application is likely to be submitted in late summer 2008 with construction unlikely to commence before second half of 2009." (P12 of Inspector's Report.)

This included worries about the opposite end of the Seapoint Road from our estate:

"Access from Seapoint Road onto the main road is already difficult and will be made more difficult with increased traffic volumes." (P19)

That statement is still very true, but it has been intensified at our eastern end of Seapoint since the bridge mentioned throughout this report was finally given some sort of description with the publication of Wicklow's proposed public transport bridge in 2021. Until then, none of us had realised that it would start with a high, wide access road (a dam) across a floodplain (claimed in that document to be a Flood Zone C) from the north; continue as the third bridge in a row in the form of a cable suspension bridge across the flight path of our swans; and end almost at our doors in Seapoint Court. The plans are confused, as well as confusing, part of the time showing buses coming over, then the Luas (and both won't fit on the bridge measurements shown, quite apart from the 3.5m road claimed in the site notices), and, finally, accompanied by a really frightening Road Safety Audit. When I try to drive out of my estate with my little grand-son, I can understand why the Audit is so damning...

...But at the time Pizarro's development was being proposed, no such scrutiny of this proposal had been carried out, despite its inclusion as a fait accompli in NRA documentation, and it seems little more has been carried out since.

The main concerns of Inspector Stephen Kay at the end of his Report seem to be around the effect the proposed development would have on the Upper Dargle Road and on the N11:

"The impact of the proposed development on the Upper Dargle Road and on the N11 in particular are a cause for concern. The character and function of the Upper Dargle Road will be significantly altered as will the function of a section of the N11 which will effectively become an access route to the development from the south of Bray with resulting negative impacts on the carrying capacity and role of this section of road." (P67: 10.12.3 of his Report) and

"Traffic generated by the proposed development, in particular traffic accessing the site from locations in the southern environs of Bray would result in an increased level of traffic on the N11 which would take on a role as a local access road between the Fassaroe and

Southern Cross access junctions. In the absence of proposals for the upgrading of the north bound capacity of the N11 between these junctions the proposed development would, therefore, have an adverse impact on the carrying capacity and operation of the national primary route and would be contrary to the proper planning and sustainable development of the area." (From Reasons and Considerations at the end of the Report.)

At present, the uncertainty around the continued fight by local residents – supported by the rest of Bray and by their local and national representatives – to keep the Herbert Road open to traffic in both directions now adds greatly to those concerns.

Consequent to those concerns in 2008, Inspector Kay recommended refusal on both traffic and flooding concerns. I should add here that I fully support SaveBray's concerns about flood risk on the opposite side of the river from our homes. Having experienced extreme flooding ourselves in '86, I have followed those arguments with interest, understanding, and agreement.

I would also like to add that I am also in agreement – as I know SaveBray is – with ABR's declared support for the need for new houses, but these must be built safely for new residents, their neighbours upstream and across the river, and the infrastructure must be in place for the sake of all our townspeople, otherwise:

"Given the key need to develop a coherent and integrated Traffic and Mobility Plan for Bray, the Alliance is of the view development of Sea Gardens Phase 2, with its reliance on vehicular access via a chronically congested road network, is premature." (From ABR's submission.)

Despite the fact that Inspector Kay's recommendation was rejected by the Board, after he was asked to submit an Addendum to his original Report, quoted above, I feel that many of the concerns expressed at that time are still valid today, but with an increased population, increased traffic, and very little increased infrastructure to cope with it.

As Bray Municipal has now set up a Traffic Committee, that CFRAM are about to publish their first flood risk maps for the Dargle area, that Bray's LAP is imminent, and that so many factors about forecast infrastructure are unknown, as they were in 2008, it would seem to me that any grant of permission for further development on this land is, as ABR have stated, premature.

Thank you.

Rachel Gibney
12 Seapoint Court
Seapoint Road
Bray, Co. Wicklow
A98 F449

23rd November, 2025

Rachel Gibney