

Sea Gardens, Phase 2: Appeal Design Statement

Wicklow County Council Planning Reference 25/60207

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2447-A-RP-251014-Bray P2-Appeal Design Statement-SI-01

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Document Outline

This statement has been prepared by Howells on behalf of Shankill Property Investments Ltd. to accompany the planning appeal for Sea Gardens Phase 2, Bray.

Following the decision to grant permission from Wicklow County Council (WCC), and the associated planning conditions, the design team has reviewed the original proposal for a 15-storey marker building. This document re-affirms the value and design intent of that height within the masterplan and we are of the view this is the most appropriate height for this building, providing design continuity across the masterplan / Sea Gardens development. However, should ACP concur with a reduction in height to Block E, we presents an alternative 12-storey form as a balanced response between the original vision and the WCC-conditioned nine storeys.

The original 15-storey proposal for Block E remains the clearest architectural expression of the Sea Gardens masterplan. Conceived as a slender coastal marker at the confluence of the River Dargle and the Irish Sea, its height was integral to the spatial hierarchy—creating a recognisable destination visible from Bray Head, the seafront promenade, and the N11 approach.

This statement therefore re-affirms the design logic and policy support for the 15-storey form, while illustrating how the alternative 12-storey submission continues to embody the same urban design principles within a moderated scale.

The purpose of this statement is to demonstrate how the proposal continues to deliver a high-quality, context-appropriate marker building that aligns with local, regional, and national planning policy, while responding positively to its setting and community context.

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24 OCT 2025

LTR DATED FROM APP

INDG-PL-560165-WV



Fig. 01 View of Block E From River Dargle Viewpoint

Introduction

The Marker Building

PROPOSED SCHEME

Block E, as the principal marker building within the Sea Gardens masterplan, plays a defining role in shaping both the physical and visual identity of the development while establishing a strong relationship with its urban and coastal context.

Located at the intersection of the River Dargle and the Irish Sea, the 15-storey tower acts as a natural urban node, anchoring the development and ensuring visibility from multiple points across Bray and the coastline. The seafront setting offers expansive views of Bray Head and the bay, ensuring that the building becomes a striking focal point within the wider townscape.

Its Art Deco-inspired design draws from the rich tradition of seaside architecture, evoking the elegance and optimism of Ireland's coastal towns. Geometric forms, clean lines, and crafted detailing connect Sea Gardens to Bray's architectural heritage while expressing a contemporary confidence befitting a 21st-century regeneration project.

At fifteen storeys, Block E marks the culmination of the masterplan's east-west axis, framing the arrival to Market Square and Central Park. The vertical emphasis provides an elegant counterpoint to the lower blocks inland, establishing a clear visual hierarchy and enlivening the seafront skyline.

The height is a product of urban geometry: its apex aligns with the rise of Bray Head and the curvature of the coastline, producing a balanced and memorable skyline when viewed from land or sea. In functional terms, the additional floors enhance residential viability, increase active frontage, and reinforce compact-growth objectives.

Both the Urban Development and Building Heights Guidelines (2018) and the Wicklow County Development Plan 2022-28 encourage height at strategic coastal nodes. The 15-storey Block E exemplifies these principles by:

- Concentrating density within walking distance of Bray DART and the seafront;
- Creating a distinctive skyline and sense of place;
- Supporting efficient brownfield regeneration consistent with RPO 4.37 of the Regional Spatial and Economic Strategy.

CONDITIONED SCHEME

A nine-storey building at this location would be townscape-inappropriate and contrary to the established hierarchy of the Sea Gardens masterplan. The eastern corner was deliberately identified as the primary point for height—terminating the Central Park axis and forming a visual node where the River Dargle meets the coast.

Reducing the height to nine storeys would erode this legibility, weaken wayfinding between Bray Main Street, Market Square, and the seafront, and flatten the coastal skyline. It would remove the intended rhythm and contrast that express the transition from inland duplexes to the waterfront buildings, resulting in a monotonous roofline and diminished sense of arrival.

Such a reduction would also disrupt the proportional balance between Market Square and Central Park, lessening enclosure and undermining the urban character envisaged in the Height Strategy (Sec 3.6) and Height Plan (Sec 3.7) of the Architectural Design Statement. In urban design terms, it would fail to perform as the gateway marker that anchors the wider development and contributes to Bray's emerging skyline.

The Urban Development and Building Heights Guidelines (2018) and the Wicklow CDP 2022-28 explicitly encourage strategic use of height at well-served, prominent nodes. Limiting Block E to nine storeys would undermine these policies, producing a scheme of insufficient visual strength and reduced townscape quality relative to its strategic coastal setting.

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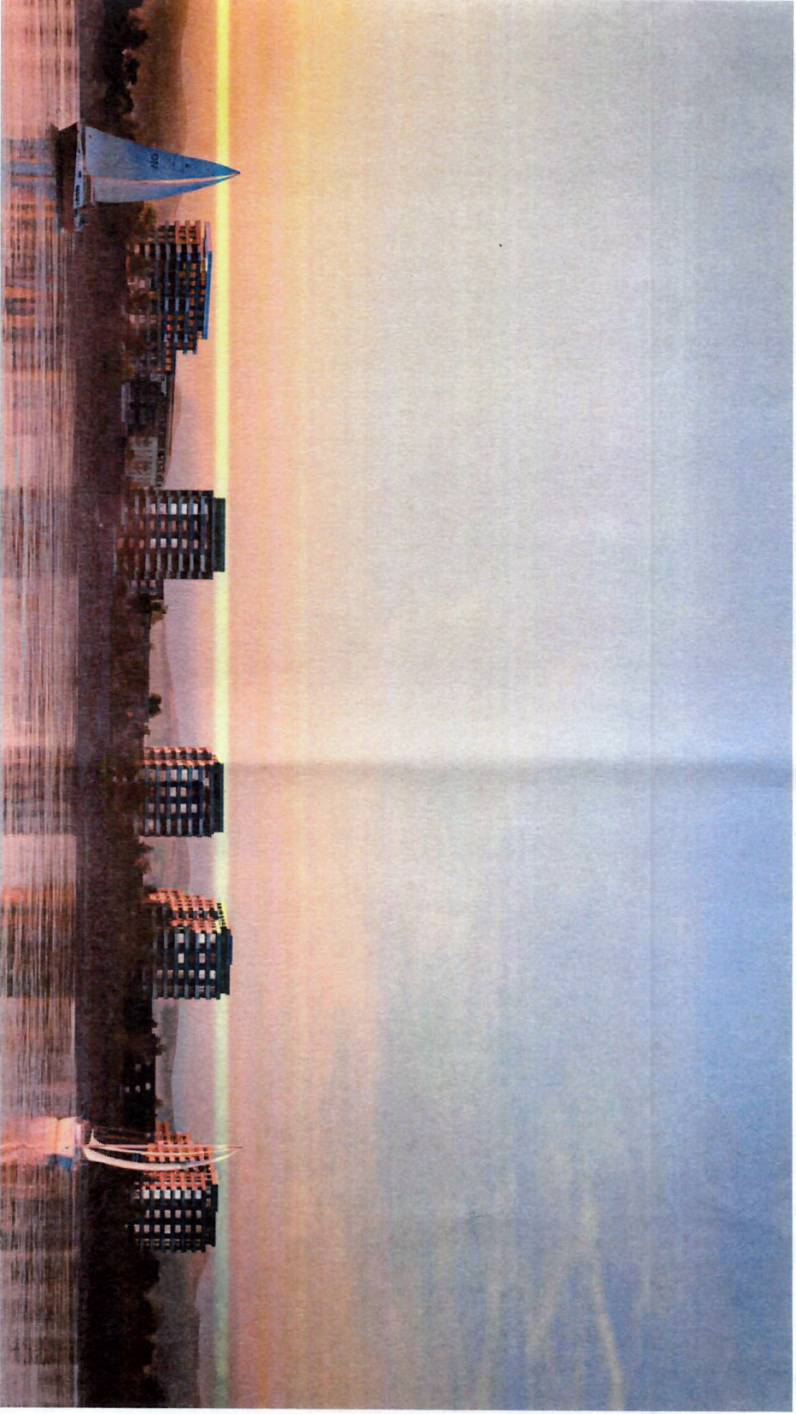
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Submitted Scheme - 15 Storeys



Conditioned Scheme - 9 Storeys

Marker Building





Submitted Scheme - 15 Storeys



Conditioned Scheme - 9 Storeys

Location of Height

HEIGHT TOWARDS THE COAST

The Sea Gardens layout establishes distinct character zones that respond to Bray's coastal morphology. Taller, higher-density blocks are located along the seafront to create a strong urban edge and celebrate waterfront living, while lower houses and duplexes (2–3 storeys) step inland.

This controlled gradation ensures a smooth transition in scale and integrates the development into Bray's existing townscape. The masterplan maximises views to Bray Head and the Irish Sea, incorporates natural features, and defines focal points such as Market Square and the Western Gateway—key civic spaces fostering social activity and sense of place.

PIZARRO SCHEME

The previously permitted Pizarro development on the former Bray Golf Course lands provides a direct precedent for both the location and scale of Block E.

Granted planning permission by An Bord Pleanála in 2008, the Pizarro scheme identified this precise corner—where the River Dargle meets the Irish Sea—as the natural site for a landmark building. Its form rose to eleven storeys above a semi-submerged basement, deliberately marking the transition between Bray's town centre and the seafront and creating a gateway visible from the promenade, Bray Head, and the N11.

Far from being exceptional, this height was integral to the approved composition: the Pizarro masterplan cascaded upwards from lower inland blocks to a slender vertical



Fig. 02 Massing View - Proposed Scheme



Fig. 03 Massing View - Pizarro Scheme

marker at the coastal edge. This approach established a legible townscape that celebrated the meeting of river, sea, and town—a principle that continues in the Sea Gardens vision.

The 2008 permission therefore represents an explicit planning acceptance of significant height at this strategic coastal node. The decision recognised that:

- The corner possesses exceptional visibility and orientation, forming a natural focal point from key approaches;
- Additional height enhances wayfinding and provides a coherent vertical reference linking seafront and town centre;

- The coastal setting and generous spacing comfortably accommodate taller forms without adverse effects.

In granting consent, An Bord Pleanála endorsed the principle that this intersection of land, water, and movement merits architectural emphasis through verticality. The Pizarro approval thus provides a clear and enduring precedent for height at this location.

The current 15-storey proposal for Block E builds directly upon that established urban logic. It does not introduce disproportionate scale, but refines and elevates a concept already accepted by the planning authority—that this corner should act as a symbolic and visual marker of Bray's coastal regeneration.

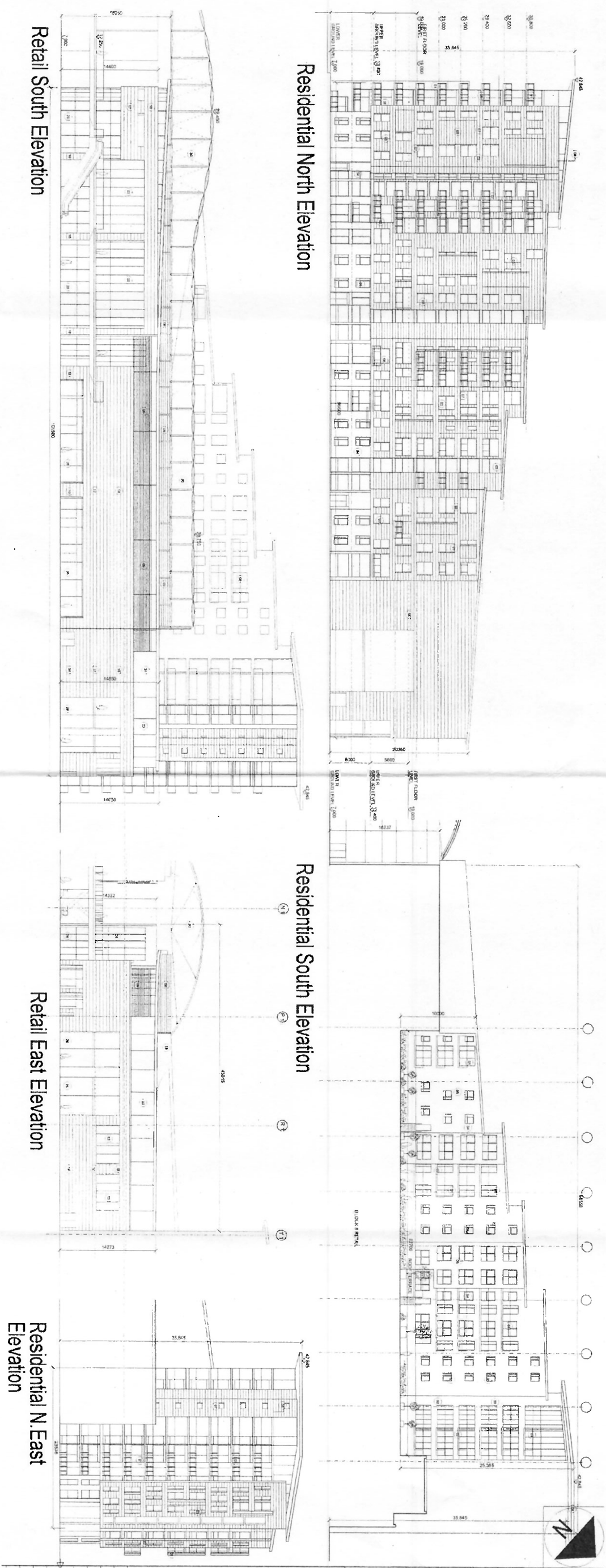


Fig. 04 Elevational Drawing Pizarro Scheme

Alternative Proposal

Alternative Proposal

ALTERNATIVE PROPOSAL

Should the Board consider a moderated approach, an alternative 12-storey option has been developed.

As detailed in the Architectural Design Statement (Ref. BRA-HWS-02-ZZ-R-A-05002, Secs 3.6 & 3.8), the original 15-storey Block E was intentionally conceived as the primary marker building terminating the Central Park axis and defining the Market Square frontage. Its slender form and height establish the legibility and hierarchy that anchor the wider masterplan, consistent with the Urban Development and Building Heights Guidelines (2018) and the Wicklow CDP

2022-28, both of which support increased height and compact urban growth at this location.

The 12-storey variant represents a design-led compromise—still architecturally coherent and far superior to the nine-storey conditioned option, which would dilute legibility, weaken hierarchy, and diminish gateway presence.

While the 12-storey design retains the key attributes of the 15-storey vision—slender profile, clear skyline, and strong urban termination—it should be acknowledged that the



Submitted Scheme - 15 Storeys

15-storey version delivers the fullest architectural and placemaking potential of the site. Twelve storeys is the minimum threshold at which the building can continue to perform its intended landmark role.



Alternative Scheme - 12 Storeys

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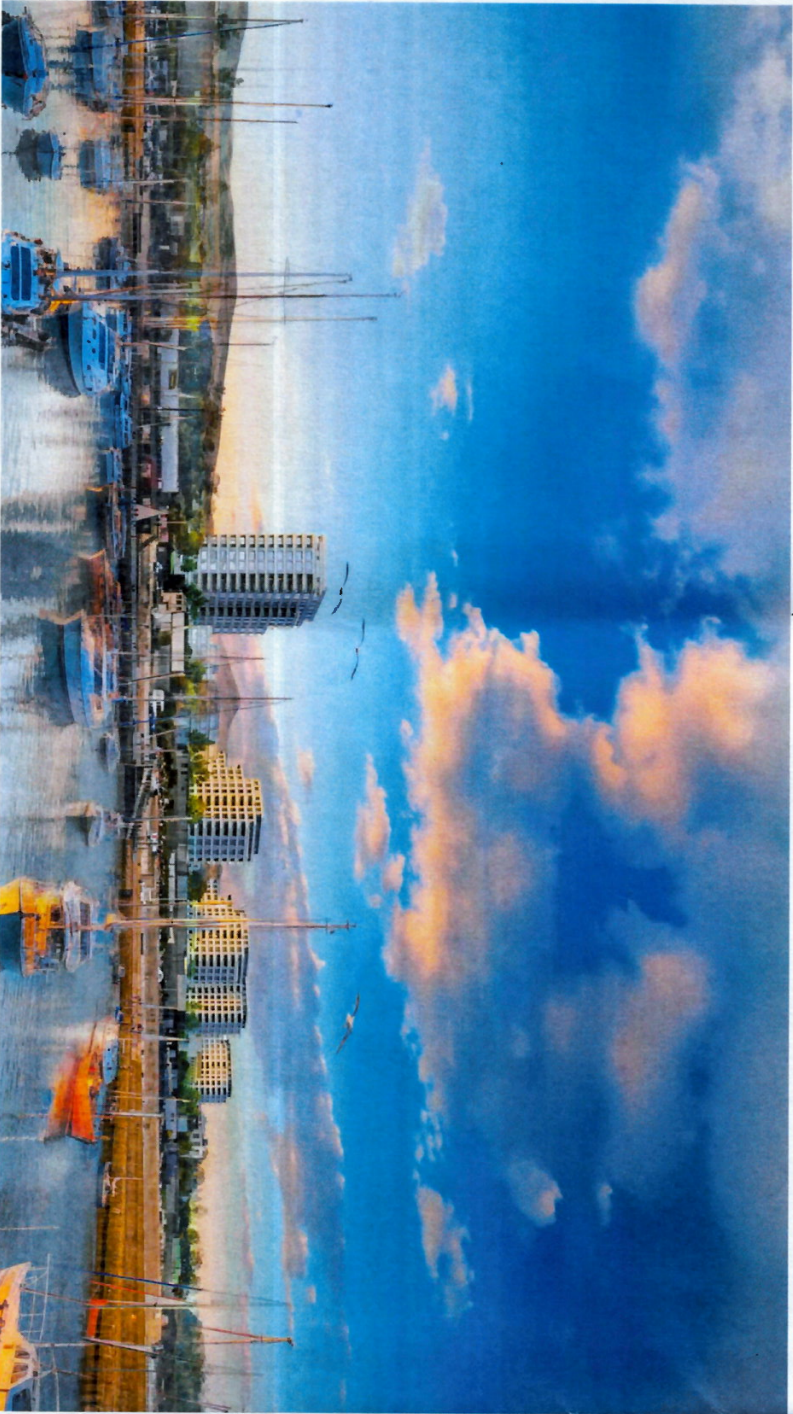
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Architectural Design and Visual Integration

The Sea Gardens masterplan establishes Block E as the visual terminus to Central Park and Market Square. Reducing the height from 15 to 12 storeys maintains this role while offering a balanced relationship with surrounding 3–7 storey buildings.

The revised height provides:

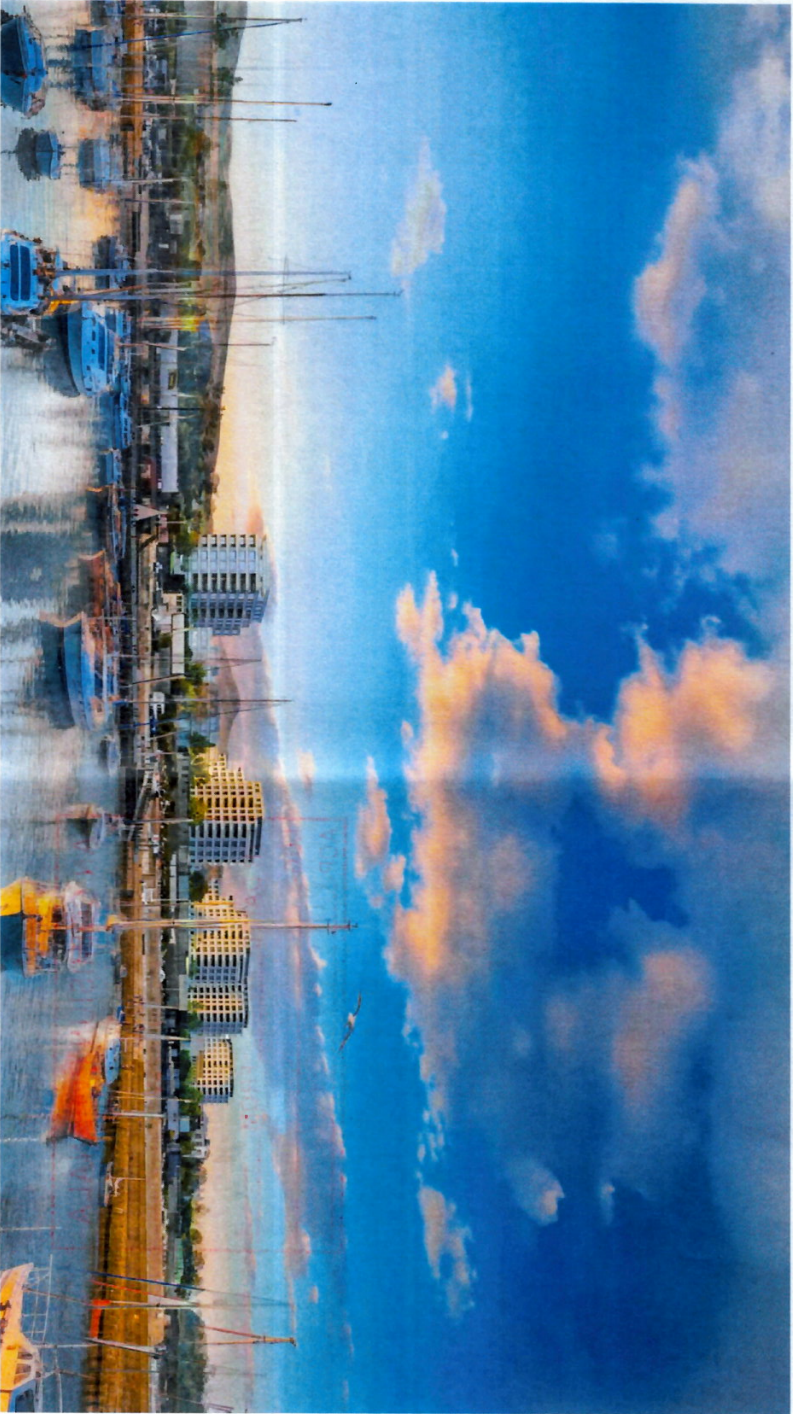
- A smoother gradation of scale from the adjacent 4-storey Block H and duplexes;
- A proportionate sense of enclosure to Central Park and Market Square;
- Preservation of key sightlines toward Bray Head, the Dargle Valley, and the Irish Sea.
- Visually, the 12-storey profile:
 - Reduces visibility in long views from Bray Head and the Dargle promenade;
 - Lessens shadowing on Central Park and neighbouring blocks;
 - Retains sufficient prominence to act as a legible wayfinding element symbolising the regeneration of the former Bray Golf Course lands.



Submitted Scheme - 15 Storeys



Alternative Scheme - 12 Storeys



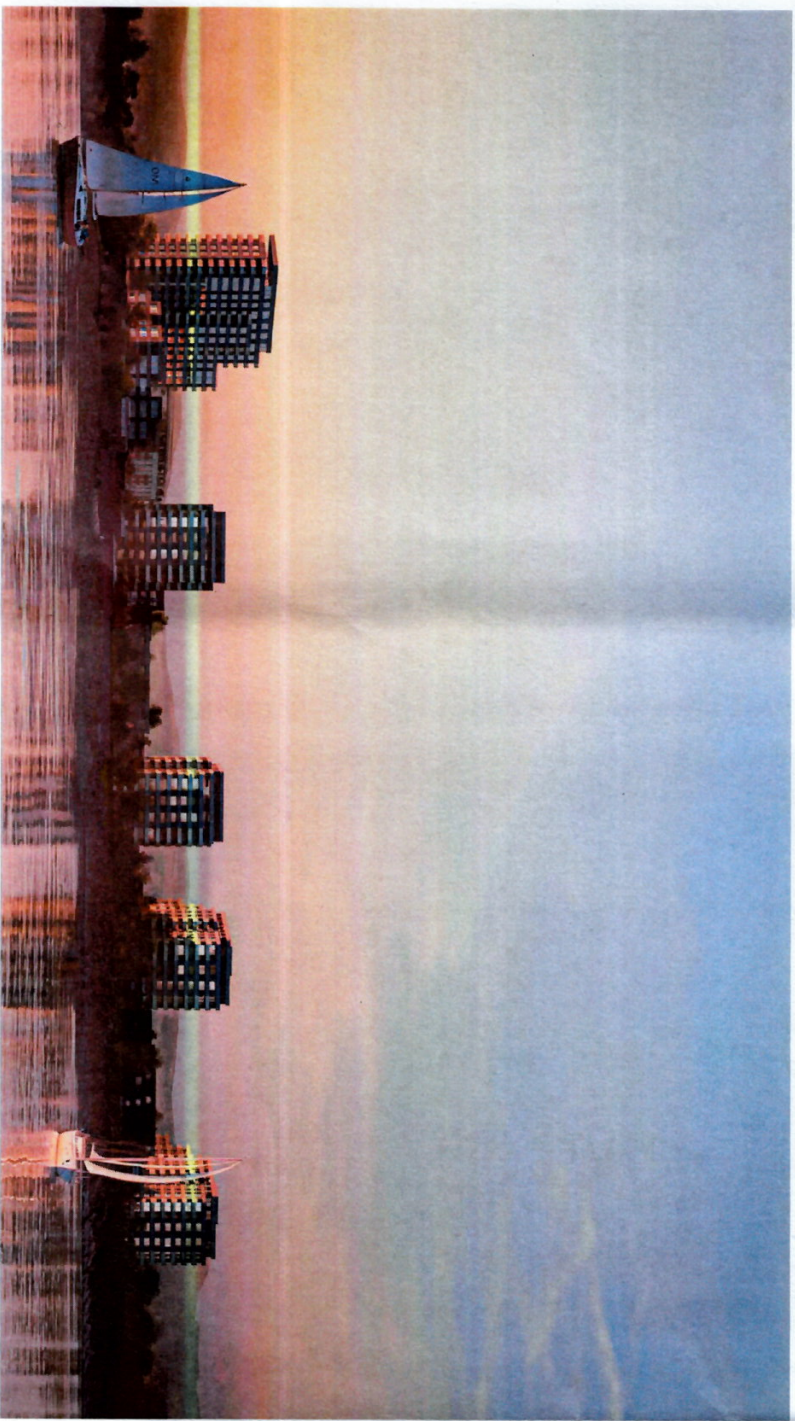
Conditioned Scheme - 9 Storeys



Submitted Scheme - 15 Storeys



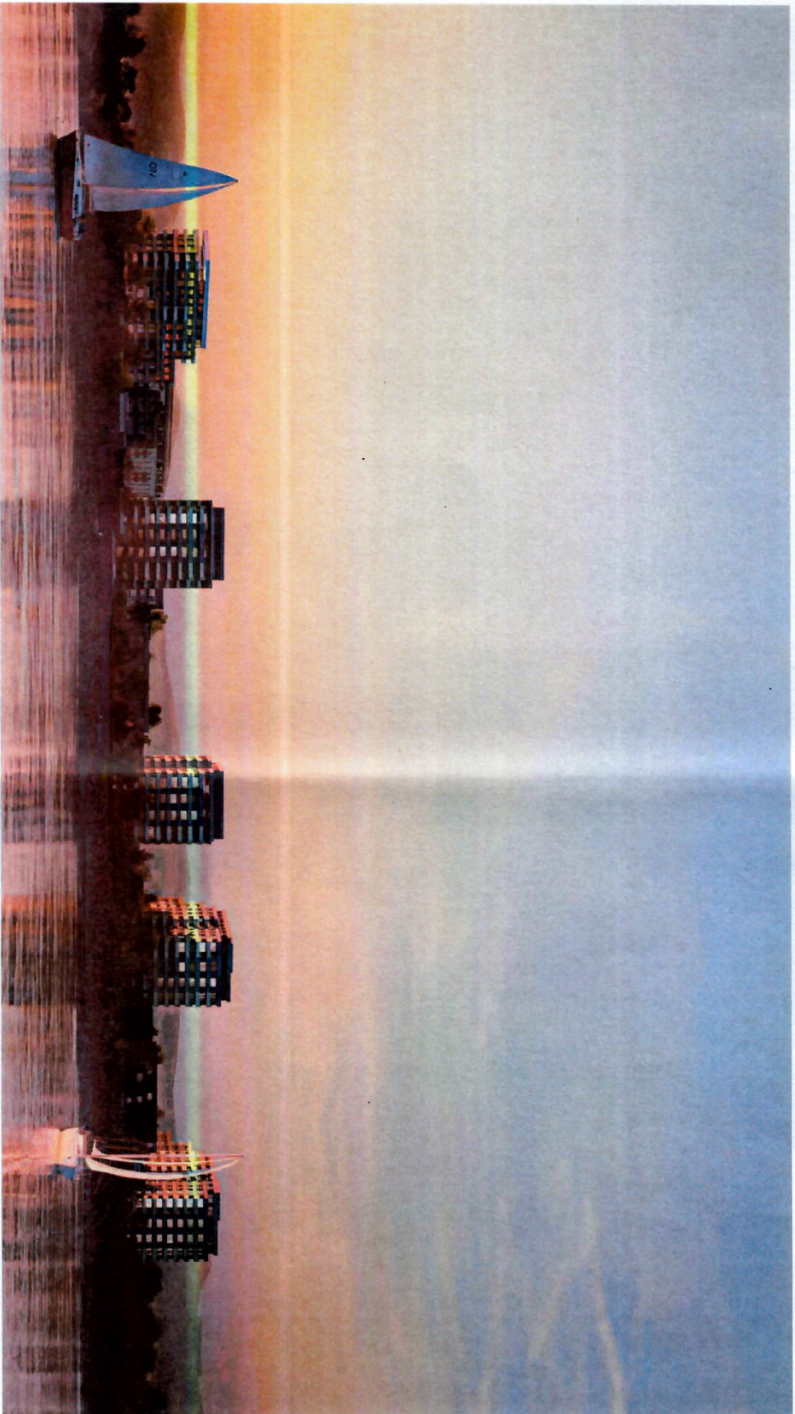
Alternative Scheme - 12 Storeys



Submitted Scheme - 15 Storeys



Alternative Scheme - 12 Storeys



Conditioned Scheme - 9 Storeys

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ACP: R-5-20165-6W



Submitted Scheme - 15 Storeys

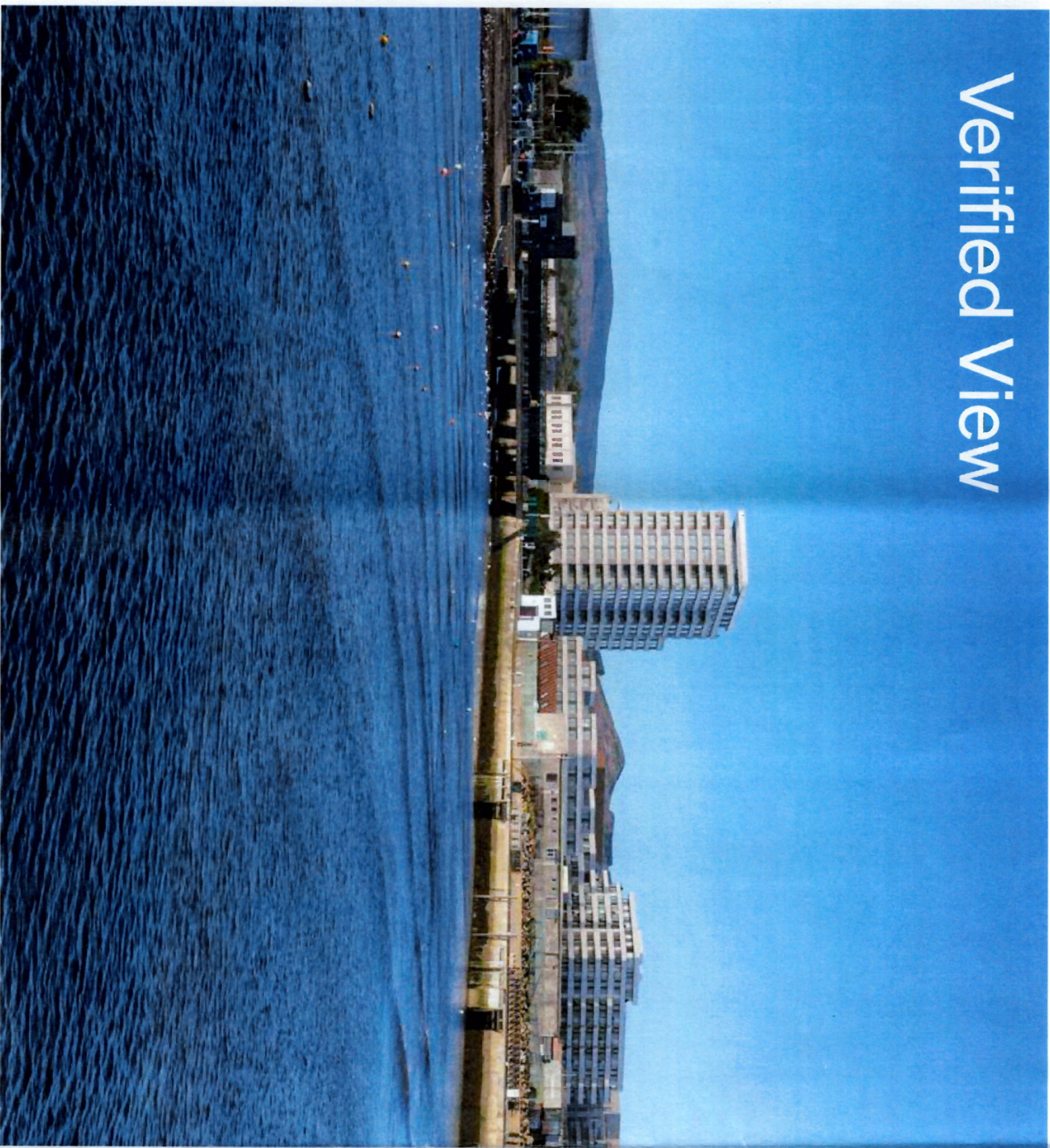


Alternative Scheme - 12 Storeys



Conditioned Scheme - 9 Storeys

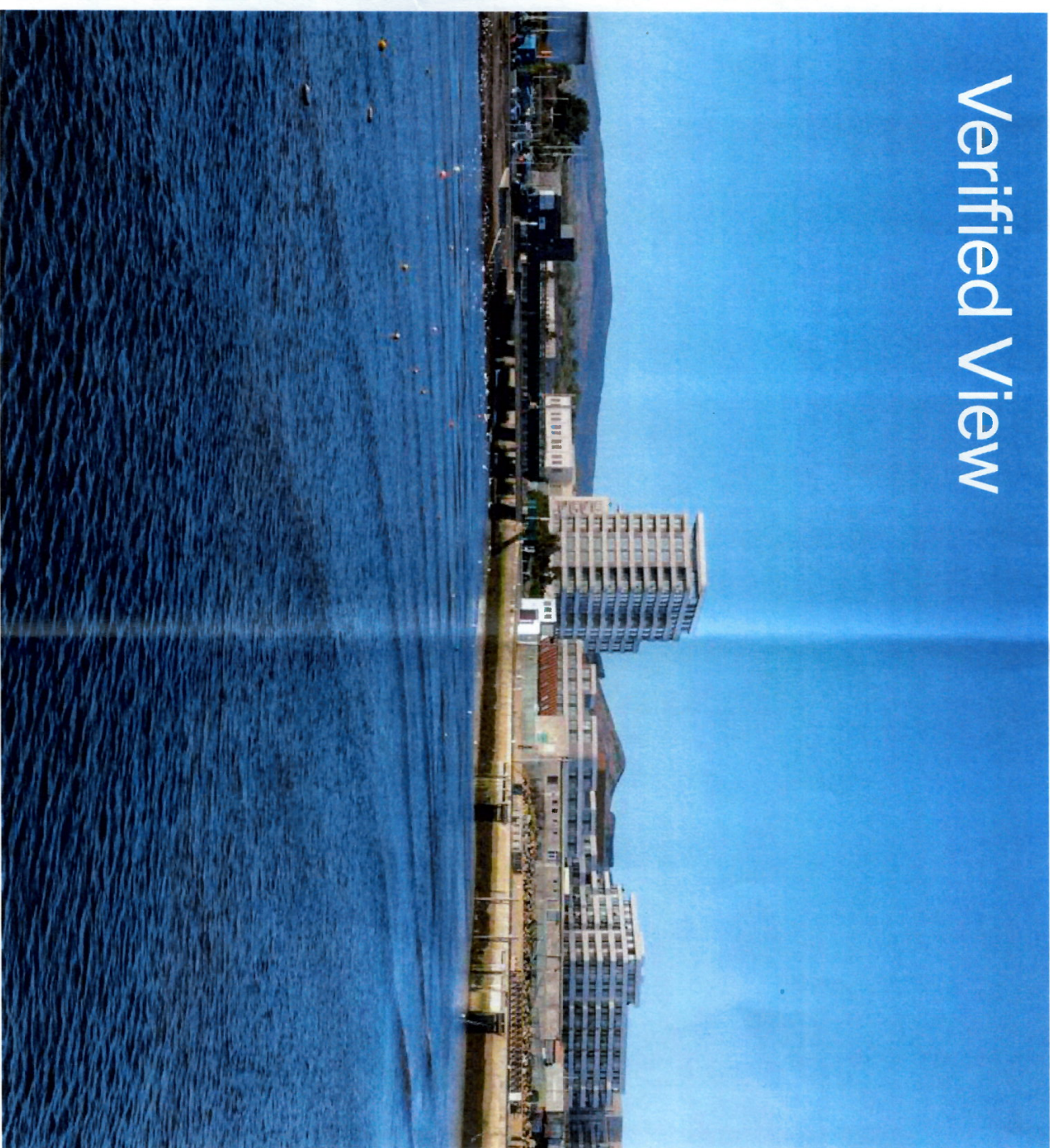
Verified View



Submitted Scheme - 15 Storeys

SCB	15
FDG	15
PLR DATED	15 OCT 2021
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Verified View



Alternative Scheme - 12 Storeys



Submitted Scheme - 15 Storeys



Alternative Scheme - 12 Storeys

Conclusion

Conclusion

Block E was always conceived as a confident, elegant marker—a contemporary lighthouse where river meets sea. Restoring the original 15-storey concept would most faithfully realise this vision and align with national policy promoting compact, design-led growth.

Should the Board consider that a moderated approach remains appropriate, the 12-storey version continues to uphold the same principles of legibility, hierarchy, and placemaking within a more measured scale.

This alternative proposal:

- Retains Block E's role as landmark and gateway to Sea Gardens;
- Balances height and context while enhancing Bray's skyline;
- Improves environmental performance and daylight access;
- Complies with national, regional, and local planning policy on sustainable height;
- Delivers a high-quality architectural statement reinforcing Bray's identity as a vibrant, regenerated coastal town.

In conclusion, the 12-storey design offers an elegant and sustainable resolution, yet the 15-storey proposal remains the optimum architectural expression of the Sea Gardens masterplan and the clearest embodiment of Bray's ambition for renewal along its waterfront.

