

3rd Party Appeal

Correspondence Coversheet

Page 1 of 1

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

Correspondence Type
3rd Party Appeal

Received From
Noeleen McManus

Lodged On
28/10/2025

Validity
Valid

Valid OH Req
No

Issue
BP01M — English

Participant
Noeleen McManus

Representative
—

Response Date
Applicable
☒

Number of Days
Allowed
28

Keep Copy of Letter
☒

Return Docs
☐

Keep Envelope
☐

Comments

Please cross circulate to all parties.

Filing

Attach to File
☐

Return to EO
☐

Signatures

Signed



Catherine Flynn, Executive Officer

Date

29/10/2025

Signed



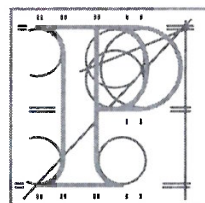
Fadime Khatipova, Administrative Assistant

Date

30/10/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000198**



An
Coimisiún
Pleanála

Section:	Processing
PA Name:	Wicklow County Council

Submission Reference:	2560207
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Date:	28/10/2025
Name:	Noeleen McManus
Total:	€220.00

Attachments/Comment:	—
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Created By:	Pádraic Keane
Channel:	By Hand

3rd Party ✓ Ack ✓
red Ack.

D.D. : 30/9/25
LD : 28/10/25

Appeal to An Coimisiún Pleanála re Grant of Permission by Wicklow County Council to Shankill Property Investments for Phase 2 of their proposed development on the former Bray Golf Club lands off Ravenswell Rd and Dublin Rd, Bray, Co. Wicklow: ref. 2560207:

A chairde,

I wish to submit the following in addition to those reasons and arguments contained in SaveBray's Appeal, signed by our Hon. Sec., Avril Power. In this document I intend to concentrate on issues that we did not manage to include fully in SaveBray's appeal, of which I am a member, but I am not repeating the arguments here to avoid putting you to the unnecessary trouble of reading exactly the same text twice: *I do, however, wish to have those arguments considered as the most important part of my Appeal also.*

Traffic/Road (and Flood) Safety:

This was addressed briefly in the introduction to the SaveBray Appeal, and expanded on a little in the Traffic/Road Safety section: we had concentrated on flood risk and wildlife, our main concerns, in the group appeal.

The flood path:

However, Shankill Property Investment's reference in their application to changing the road that leads from Ravenswell Road uphill near the western boundary of their site worried us. They had maintained in their application that, at Wicklow's request, they planned to change that road because it interfered with the flood path.

It does not, and this claim is either misinformed or deliberately misleading. The only benefit in removing the road at that point would be to allow greater connectivity between the most western part of the applicant's site and the rest.

During all of the major floods in Little Bray, the flood waters came over the walls alongside the river (so downhill at this point, as our houses are lower there than the river walls), and also, having broken upstream, flash floods tore down the Lr. Dargle Road, Greenpark Road (the middle Dargle), and all the little streets in between. When they crossed Castle Street, they entered Dwyer Park at both ends, but culminated at the gate protecting the side entrance to the old golf club lands at the southern end of Dwyer Park. Once this gate was broken down, the flood waters poured onto the floodplain and the levels of flooding immediately dropped throughout Little Bray. This is well documented, particularly regarding the '86 flood when high tide was due at 4am, but the flood levels dropped at 2am, immediately after that gate was smashed open by a local man.

The gate today is shown in a photograph attached to SaveBray's appeal, and it clearly shows a car heading slightly downhill on the road that Shankill Property/Wicklow County Council maintain is blocking the flood path. The road actually dips at that point before climbing northwards. If that road is changed, and either raised in another location, or if building is allowed in front of that gate, then the results in future floods will be catastrophic.

Having now managed to read through the relevant sections of Shankill Property Investment's response to Wicklow's FI requests, and the Traffic Impact section of their original application, I can still find no reference as to what the applicant succeeded in getting permission for at this vital point of the flood path from Little Bray onto its floodplain.

AN COIMISIÚN PLEANÁLA
J.D.G.
ACP- Fee-PAF-000198
28 OCT 2025
Fee: € 220 Type: C17
Time: 12:33 By: Gary

Appeal to An Coimisin Pleanála re Grant of Permission by Wicklow County Council to
Shankill Property Investments for Phase 2 of their proposed development on the former
Bray Golf Club lands off Ravenhill Rd and Dublin Rd, Bray, Co. Wicklow ref. 2580207

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Wicklow County Council
25 OCT 2007
25 OCT 2007
25 OCT 2007
25 OCT 2007

I would be grateful if the Inspector would look closely at this danger point.

Confused naming of roads:

Reading through the above documentation, however, finally enabled me to answer our group question as to which roads were referenced in Wicklow's FI requests at 4(c): 'the southern access junction'; 5(a): 'the proposed active travel entrance 'at the southwest corner of the overall site'; and 5(f): 'the proposed junction of the south-west access point and the link road' as well as in Conditions 5iii: '...until the southern road access is complete' and 16: 'Monitoring of the proposed southern access junction...' in their Grant of Permission.

We presumed that these all referred to the junction at Ravenswell Road and Castle Street, beside the Fran O'Toole bridge, as per 5(a and f), the only references that are clear. In fact, in 4(c) the southern access refers to a new access from the junction at Castle Street/Upper Dargle Road, as do Conditions 5iii and 16 – even though this junction is actually located at the north-western part of the site!

The changes in names of the roads within this site throughout Shankill Property's various applications is very confusing indeed. For instance, what was originally built as the schools' road has now become the Eastern Development Road, having gone through several name changes in between. This is particularly difficult when most of the prolific documentation submitted is listed on Wicklow's planning portal with very little specifics to help ordinary citizens find them, much less read and understand them in the four weeks allotted.

This seems an unjust burden to put on the residents whose lives and homes will be most affected by these proposals, and I would suggest it is contrary to the spirit, if not the letter, of planning law.

Junctions:

Reading those documents did give me a clearer picture of what is proposed to happen at the various junctions between the applicant's site and Castle Street/Dublin Road.

In summary, it seems to be that the junction between Ravenswell Road and Castle Street will be closed to everything except pedestrians and cyclists, using 'Traffic Redistribution' to channel the frustrated traffic to the 'southern road access', which "will be operating over capacity" according to the modelling quoted in Wicklow's FI request 4 (c). The planning authority goes on to request 'further measures beyond the right turn prohibition into the proposed development' to alleviate this problem, but neither they nor the applicant mentions of the fact that the Upper Dargle Road, as any local will tell you, is narrow and patently incapable of taking the heavy burden of traffic imposed on it in this plan. It is also a road onto which a right turn for traffic heading south at this junction means a long line of traffic held up behind them, wishing to go straight ahead. Furthermore, there is no possibility of widening the Upper Dargle Road, due to its elevation above the road to its south (Greenpark), and the very high embankment to its north.

Redistributing traffic from the Ravenswell Road access to Sunnybank, as that junction is known, will simply mean that the traffic deadlock along Castle Street will happen sooner for drivers entering the town. Traffic lights at the Ravenswell Road junction would be a far more efficient solution to this problem, until a second bridge for cars is built further upriver. Then the Fran O'Toole bridge could be turned into a public transport bridge, with pedestrian and cycle infrastructure installed on boardwalks outside the bridge walls as already planned. This would take public transport into the town centre where it is needed, and cars off our presently over-

stretched northern entry to the town, and its only bridge. The only beneficiary from the present plan would be Shankill Property Investments as they will have cleared another obstacle from their development.

FI questions from Wicklow at 3 (d), at 5 (a-f), and throughout the Road Safety Audit all reflect a worry about the safety of cyclists and pedestrians at this junction. The applicant's response to each can be summed up in the sentence used in the answer to each of the points 5 (a-f), ie. "The proposed final layout reflects a context-sensitive and balanced solution that prioritises accessibility, safety, and a high-quality public realm, while also delivering an intuitive experience for all users at the Ravenswell Road gateway. We are confident that it provides the best outcome for all users." In other words, we know best...

Prerequisites:

Several references are made by the applicant to prerequisites in the BETS 2019, as follows:

- 1) 'While the BETS 2019 identifies bus priority on Dublin Road as a prerequisite, the proposed development can proceed in the absence of the full implementation of the BusConnects scheme on the basis that it is currently well-served by existing public transport infrastructure.'
- 2) 'While the BETS 2019 identifies the development of an interchange at Bray DART Station as a prerequisite for the complete development of the Golf Club Lands where Sea Gardens Phase 2 development is situated, the proposed development can proceed in its current form due to the advanced status of the interchange works and the availability of existing infrastructure that supports multimodal access.

'In the interim, the development benefits from existing infrastructure, including the rail underpass approximately 800 metres from Bray DART Station, which provides a direct and functional connection for both active travel and vehicular users.' And:

- 3) '...while the BETS 2019 identifies a commitment to the phased introduction of bus and enhanced rail services as a prerequisite, the proposed development can proceed in the absence of a formalised commitment because the necessary strategic frameworks and infrastructure programmes are already in place and progressing. The NTA's BusConnects programme, the D T+ expansion, and the long-term Luas Green Line extension to Bray collectively represent a clear and active commitment to enhancing public transport capacity and frequency across the Greater Dublin Area, including Bray. These programmes are not speculative; they are funded, phased, and in various stages of implementation, with BusConnects construction commencing in 2025 and DART+ already delivering infrastructure upgrades.'

....

'Therefore, while a formalised commitment to service phasing may not yet be in place, the combination of existing services, active national programmes, and the development's strategic integration with future infrastructure ensures that it can proceed in a manner consistent with the objectives of the BETS 2019.'

That is three separate prerequisites that this application does not meet, and the applicant – and Wicklow County Council – seemingly think that there is no need for them to do so. The underlining of the prerequisites in these quotations is mine, and in the final quote I have also

underlined demonstrates the vagueness of the possibility of the Luas coming to Bray along the route proposed by Wicklow County Council – and by Shankill Property Investments.

Luas:

The applicant's 'Traffic Impact Reports/Traffic & Transportation (Report 1 of 10), submitted with their original application, states on p43 that:

'The Greater Dublin Area Transport Strategy 2022-2042 highlights Bray as a potential destination for an expanded Luas line. An indicative alignment of the proposed extensions can be seen in Figure 4-5. The purpose of the expansion of light rail is to help existing bus networks cope with increases in demand up to and beyond 2042. Measure LRT5 of the Strategy states "It is intended to extend the Luas Green Line southwards in order to serve the Bray and Environs area". Based on analyses, the NTA has deemed that there is sufficient demand for an expansion of the existing Luas towards Bray. This line is not proposed to be developed until after 2035 but it is anticipated that the alignment will be adjacent the Dublin Road, into the development lands and into Bray Train Station via the proposed Public Transport Bridge. The masterplan for the development lands takes cognisance of the provision of the Luas extension and its interface with the development and locations of LUAS stops.'

Yet this 'potential' coming to Bray of the Luas, with its 'indicative alignment of its 'anticipated' passage through the development lands, is the cornerstone on which Wicklow County Council has built their arguments for constructing a breathtakingly expensive bridge, alongside the two bridges already present at this location, in a design that would be catastrophic for our mute swans and other sea and river wildlife, with access roads on either side crossing floodplains, and ending at a narrow, crooked, and already dangerous junction between the Seapoint Road and Bray's promenade.

The bridge alongside its proposed location is the railway bridge, and Iarnród Éireann have already publicly declared their worries about coastal erosion along that eastern coastline. The government has promised to set up a Managed Retreat strategy that will move houses back from the coastline within the next ten years because of that same erosion. And we want to build a hugely expensive bridge there...? And one that will divert badly needed public transport away from our town centre to cross a private development.

At present this bridge is only a proposal, an unauthorised development that has not yet been put to the councillors on whose yea or nay the bridge will go ahead. Yet its status as a 'fait accompli' is already appearing in NTA documents, in Conditions attached to Shankill Property's last application (Phase 1a) which is presently the subject of a Judicial Review, and now in Wicklow's Grant of Permission to Shankill Property Investments Phase 2 application.

That is blatantly flying in the face of planning law, and no ordinary citizen would get away with it.

Shankill Property Investments' Applications Status:

Shankill Property Investment received permission for 234 housing units in their Phase 1 application for the high (Flood Zone C) ground: Apartment Blocks A and B were refused. They refer constantly to having permission for their Phase 1a application, but this is being challenged in Court at present, again as a Judicial Review. Now they have been granted permission by Wicklow County Council for their Phase 2, which, if it succeeds, will almost certainly enable them to proceed to Phase 3, which they have openly said will consist of the highest density building of all on a floodplain, as they will have already provided a promised public park on the

higher ground in this Phase 2 application. That is why we are challenging this grant of permission in our Appeals. The applicant's strategy of starting their building applications on the highest ground makes a mockery of the Flood Risk Management Guidelines.

Surely, it makes sense to wait for the result of the Judicial Appeal against the Phase 1a application before granting permission for a strongly opposed Phase 2, apart from all the other reasons why this latest permission should not have been granted.

Wicklow County Council:

Our planning authority has proposed a flawed plan to build a public transport bridge and access roads in this location, including providing the wrong measurements for the 'two-lane public transport road (3.25m wide)' quoted by Shankill Property Investments from Wicklow's plans. In fact, it is between 12 and 15m to allow for two lanes for the buses shown in the proposal (the Luas appears later), plus cycle and pedestrian lanes, and the spaces in between. More importantly, and very worryingly, this proposal claims that the access road will not cause any flood risk as it is built on a Flood Zone C: in Bray's Local Area Plan 2018 the same land is shown correctly as a Flood Zone A. Wicklow also claimed that their proposal would have no effect on the environment and so did not need an EIA. An earlier Judicial Review, followed by a decision by your Board, revised that. Neither the EIA nor the Natura Impact Assessment have been carried out to-date, and meanwhile the land to which they apply is being destroyed by construction machinery and materials.

How can such a planning authority, so heavily invested in going ahead with this plan that they ignore the 53 submissions expressing concerns about flood risk and wildlife and the environment and concentrate instead on demanding how the applicant's plans will fit in with their proposed bridge, be expected to give an unbiased decision on that application?

For all of the above reasons – and for the reasons argued in the SaveBray appeal, I would respectfully ask that this grant of permission be overturned by An Coimisiún Pleanála.

Signed: _____

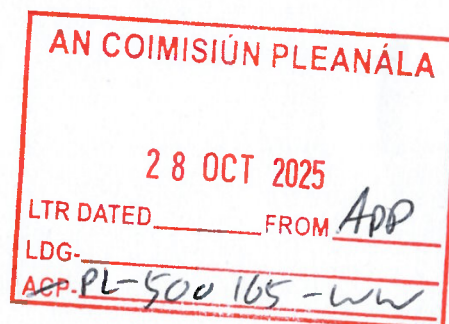
Noeleen McManus

Noeleen McManus

1, St. Cronan's Road,

Bray, Co. Wicklow.

A98 WD59



Date: _____

28/10/2025



Comhairle Contae Chill Mhantáin Wicklow County Council

Pleanáil, Forbairt Eacnamaíochta agus Tuaithe
Planning, Economic & Rural Development

Áras An Chontae / County Buildings
Cill Mhantáin / Wicklow
Guthán / Tel: (0404) 20148
Faics / Fax: (0404) 69462
Rphost / Email: plandev@wicklowcoco.ie
Suíomh / Website: www.wicklow.ie

29/04/2025

Noleen McManus
1 St Cronan's Road
Bray
Co. Wicklow
A98 WD59

ACKNOWLEDGEMENT of RECEIPT of SUBMISSION or OBSERVATION on a PLANNING APPLICATION

THIS IS AN IMPORTANT DOCUMENT

KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANÁLA IF YOU WISH TO APPEAL THE DECISION OF THE PLANNING AUTHORITY. IT IS THE ONLY FORM OF EVIDENCE THAT WILL BE ACCEPTED BY AN BORD PLEANÁLA THAT A SUBMISSION OR OBSERVATION HAS BEEN MADE TO THE PLANNING AUTHORITY ON THE PLANNING APPLICATION.

PLANNING AUTHORITY NAME Wicklow County Council

PLANNING APPLICATION REFERENCE No.2560207

A submission/observation in writing, has been received from
Noleen McManus on 24/04/2025 in relation to the above planning application.

The appropriate fee of €20 has been paid. *(Fee not applicable to prescribed bodies)*

The submission/ observation is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended) and will be taken into account by the planning authority in its determination of the planning application.

SENIOR EXECUTIVE OFFICER
PLANNING, ECONOMIC & RURAL DEVELOPMENT.

Date 29/04/2025

Planning Authority Stamp

WICKLOW COUNTY COUNCIL
29 APR 2025
PLANNING DEPT.

*Tá an doiciméad seo ar fáil i bhformáidí eile ar iarratas.
This document is available in alternative formats on request.*

Ba chóir gach comhfhreagras a sheoladh chuig an Stiúrthóir Seirbhísí, Pleanáil, Forbairt Eacnamaíochta agus Tuaithe
All correspondence should be addressed to the Director of Services, Planning, Economic & Rural Development.

