

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
The Dargle
Area Residents
Association

Lodged On
28/10/2025

Validity
Valid

Valid OH Req
No

Issue
BP01M — English

Participant
The Dargle Area Residents Association

Representative
—

Response Date
Applicable



Number of Days
Allowed
28

Keep Copy of Letter



Return Docs



Keep Envelope



Comments

Please cross circulate all appeals

Filing

Attach to File



Return to EO



Signatures

Signed



Catherine Flynn, Executive Officer

Date

29/10/2025

Signed



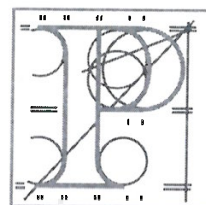
Fadime Khatipova, Administrative Assistant

Date

30/10/25

Correspondence Coversheet

Payment ID: **FEE-PAY-000206**



An
Coimisiún
Pleanála

Section:	Processing
PA Name:	Wicklow County Council

Submission Reference:	25/60207
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Date:	28/10/2025
Name:	Dargle Area Residents' Association
Total:	€220.00

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

3rd
ACK

DO: 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 the proposed development on the former Bray Golf Club lands off Ravenswell Rd and Dublin Rd, Bray, Co. Wicklow

Planning Ref. 25/60207

**By: The Dargle Area Residents' Association (DARA)
% 3 Glenburgh Terrace, Lower Dargle Road, Bray, Co Wicklow**

The Dargle Area Residents' Association (DARA) wishes to appeal the decision of Wicklow County Council to grant planning permission (with conditions) to Shankill Property Investments for Phase 2 of the Sea Gardens estate in Bray. Our original submission to Wicklow County Council is attached and we are submitting this along with this letter outlining some of the points from our submission that we believe have not been taken into account by Wicklow County Council in their granting of permission.

DARA represents more than 700 households in the Dargle area, which will be among the communities most affected by any further development on these lands. Many residents have experienced traumatic life-threatening flooding events in the past from the Dargle River. We also already experience severe traffic gridlock in the local area, with access onto roads such as Castle Street and the Dublin Road particularly problematic. Residents also have a long-standing attachment to the river, its wildlife and local tranquil river walk where it is possible to experience wildlife and nature while walking down to the harbour.

We wish to make it clear that DARA is fully supportive of the sustainable development of Bray to provide much-needed housing once issues around flood risks, traffic and congestion and protection of our local wildlife are addressed.

AN COIMISIÚN PLEANÁLA
LDG- Fee-pay - 200206
ACP- _____
28 OCT 2025
Fee: € 220 Type: 11
Time: 15:15 By: Hand

1. Traffic

In its original submission to Wicklow CoCo, DARA expressed grave concerns about the potential impact of this development on traffic in Bray, with a disproportionate impact on residents of the Dargle area, and this concern has not been adequately addressed in any of the conditions of the approval of the development.

At the present time, Bray is experiencing traffic chaos on a daily basis, not just at peak traffic times, but all day, every day. Traffic entering the town must pass over the Fran O'Toole bridge, a narrow Victorian single carriageway bridge designed for the 19th century. Mounting concern about Bray's traffic chaos in recent years has contributed to the formation of the Association of Bray Residents (ABR), a loose affiliation of Residents' Associations and concerned citizens, to lobby local representatives on this issue.

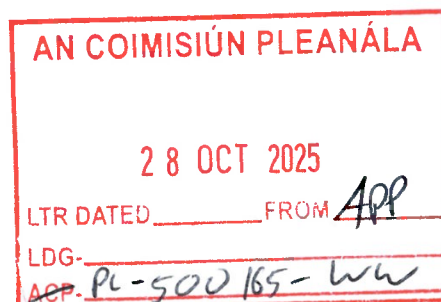
In 2024, on foot of a series of meetings with local representatives from all parties and none, as well as TDs, the Association of Bray Residents (ABR) made a presentation to the October meeting of Bray Municipal District (BMD) in which they outlined the critical state of Bray traffic at that point in time, in the context of the predicted development of the town and its population to 2030. As a result of this, BMD councillors voted unanimously to set up a Traffic and Transport sub-committee to address the issues identified. Over a year later, that committee has not yet met, and it appears that the membership of the committee may not yet be agreed, illustrating an apparent lack of commitment by BMD and Wicklow CoCo to tackle the serious issues caused by traffic congestion in Bray town.

DARA shares the concerns of the Alliance of Bray Residents that, given the need to develop a coherent and integrated Traffic and Mobility Plan for Bray, development of Sea Gardens Phase 2, with its reliance on vehicular access via a chronically congested road network, is premature.

The conditions of approval related to traffic, 5(a) (i) and (ii) refer to the proposed pedestrian and cycle infrastructure at the Fran O'Toole bridge. DARA welcomes any proposal to create safe options for active travel - walking and cycling, and would look favourably on proposals to create a pedestrian and cycle infrastructure at the Fran O'Toole bridge; however we see no evidence of an agreed timeframe for the commencement or completion of the pedestrian and cycle infrastructure referred to above, which lies within the remit of Wicklow CoCo and not the developer. We are also concerned that Wicklow CoCo has reserved the option to enter into an agreement with the developer at a later stage, which would potentially undermine what appears to be a commitment, in theory at least, to supporting active travel, and imposing a consequent condition on the developer.

Condition 5 (a) (iii) refers to the completion of work on the "southern access route", an extensive and far-reaching project, designed to enhance access for both residents and businesses. Were it to go ahead without objections or amendments it would take many years to be complete; it has proven, however, to be a contentious issue, still far from being resolved, which will push a completion date far into the future. It faces significant opposition from local communities and public representatives, most notably their opposition to the closure of the Herbert Road junction with the N11. It appears that Wicklow CoCo may have reserved the right to enter into an agreement with the developer to enable occupation of Sea Gardens in advance of the completion of this access route.

Condition 17 requires the submission and agreement of a Mobility Management Strategy, providing incentives for residents to encourage the use of public transport, cycling, walking, car pooling etc. DARA is in favour of any incentives to minimise car usage, and supports the use of sustainable transport. Any strategy to reduce the volume of traffic in Bray is welcome, from the perspectives of congestion, clean air, safety and general health and well-being. However, this condition requires only the submission of a Mobility Management Strategy; while this is to be prepared and implemented by the management company of all units in the development, it is difficult to see how it can be anything other than aspirational, particularly as there is no time



frame for the creation of safe walking and cycling spaces by Bray Municipal District. The likelihood is that this will be simply a paper exercise, inserted to placate concerned citizens.

Pending the installation of this additional infrastructure, some many years hence, we are concerned that the level of reliance on the private car by those living in Sea Gardens will be much higher than the developers state in their application.

2. Environment and Wildlife

Wicklow County Council has declared a biodiversity crisis and committed to actions to support biodiversity in the county. Neither Wicklow County Council's request for further information from the applicant, nor the conditions set in their granting of planning permission for Phase 2 of Sea Gardens, address the potential effects of the proposed development on wildlife and biodiversity as outlined in our original submission, except as regards the construction stage.

Waterbirds reserve

The estuarine stretch of the Dargle River that runs along the southern border of the site between Bray Bridge and the harbour is a vital habitat for significant colonies of waterbird species – some designated as of national and international importance. These include mute swans, mallard ducks, grey herons, little egrets, cormorants, black-headed gulls, herring gulls and more. After dark, the mute swans, herons and ducks particularly take refuge in the peace and quiet of this relatively dark stretch of estuarine river beside the harbour, resting and feeding – as local people regularly witness when walking along the river walk at night time.

The developer's Environmental Impact Assessment Report (EIAR) mentions nearby Bray Harbour as an important site for waterbirds but does not acknowledge this estuarine stretch of the Dargle River that runs alongside their site as an equally important habitat and waterbird refuge, as well as an important flight path. The detrimental effects of Artificial Light At Night (ALAN) on wildlife are well documented.

The developer's stated plans for Phase 3 include locating the highest apartment blocks directly overlooking this stretch of the river. If this Phase 2 is granted planning permission, with the recreational park located in the middle ground, then this will enable the developer's stated intention to locate their highest density buildings on the floodplain alongside the river in their final Phase 3.

We believe that the developer's EIAR has not taken into account the effects of both noise and light pollution from the row of large apartment blocks they intend to build directly overlooking this stretch of the river – with plate glass windows and balconies shining light directly onto the river and the resting birds at night.

Although Wicklow County Council has required that the applicant reduce Block E from 15 to 9 stories, we submit that this will still present a threat of injury and collision to the colony of swans located only 100 metres from the block.

Bats

Bats are protected and are very light-sensitive. The developer's Environmental Impact Assessment Report Vol. 2 for Sea Gardens Phase 2, Section 5.2.3 cites two Ecological Field Surveys under headings: Previous Surveys and 2022-24 surveys.

The 2022-24 surveys on activity of bats only surveyed three transects on the actual development site but not the stretch of the Dargle River that runs directly alongside where the developer proposes in Stage 3 to build large apartment blocks on the southern border of their site, directly overlooking the river.

Independent bat surveys of this stretch of the Dargle River have recorded Daubenton's, Soprant Pipistrelle, Common Pipistrelle and Leisler's bats. Recommendations in the 'previous survey' cited in the developers' EIAR (see appendix Lighting Design Review Letter) carried out in 2022 include:

"There should be no lighting along the southern boundary adjacent to the River Dargle" and "it is essential that... areas of suitable bat habitat... located along the boundary of the proposed development are part of a continuous dark zone that allows nocturnal animals, including bats, to travel during the hours of darkness."

It is our view that the current proposed development does not take account of the effect on light-sensitive bats who forage along the Dargle River of potential light pollution from large apartment blocks with windows and balconies directly overlooking this stretch of river. It would be better for local biodiversity if the parkland that is planned for the centre of the development in Phase 2 were relocated to this riverside location on the floodplain, and the apartments planned for Phase 3 being built instead in the middle ground.

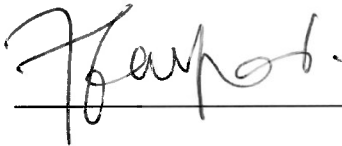
3. Visual Amenity

Bray Harbour is a small harbour with a distinctive Victorian character. Although Wicklow County Council has taken account of objections to the height of the proposed Block E by reducing its allowable height from 15 to nine stories, we believe that this will still be too visually intrusive to residents and visitors who spend so much time in this beautiful characterful harbour observing the swans and other birds in what is a sanctuary for wild birds. Even reduced to nine stories, this block will tower over the harbour and be completely out of keeping with the surrounding architecture.

In conclusion, DARA is fully supportive of the sustainable development of Bray to provide much-needed housing, once issues around traffic congestion, flood risks and protection of our local wildlife are addressed.

Signed:

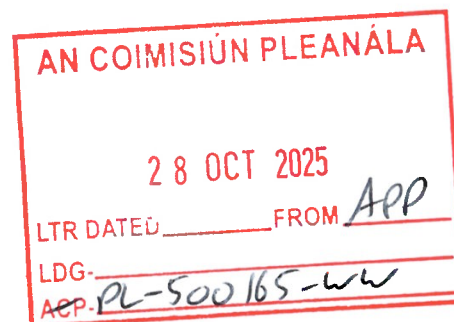
Date: 28th October, 2025



Frances Gaynor, Chairperson DARA

Attachments

- Original DARA submission to Wicklow CoCo
- Lighting Design Review Letter
- Confirmation from Wicklow CoCo of receipt of original submission
- Bank draft €220.00



**Submission to Wicklow County Council Planning Department re
Planning Application Ref. 2560207 by Shankill Property
Investments for Sea Gardens Phase 2**

Dargle Area Residents' Association (DARA) wishes to make the following submission on the above planning application.

Residents of the Dargle area will be among the communities most affected by any further development on these lands. Many residents have experienced traumatic life-threatening flooding events in the past from the Dargle River and also experience daily severe traffic gridlock in the local area. Residents also have a long-standing attachment to the river, its wildlife and local tranquil river walks where it is possible to experience wildlife and nature while walking down to the harbour.

Traffic and infrastructure

Residents of the Dargle area of Bray already experience severe traffic congestion on roads in the local area on a daily basis.

DARA is an active member of the Alliance of Bray Residents, whose work we support in highlighting the urgent need to address the chronic traffic congestion that is having a severe negative impact on the day-to-day lives of Bray residents and on the business interests, including tourism, of the town.

On the basis of approved, applied for and future proposed development, Sea Gardens will comprise 1,273 residential units, 34,700m² commercial/retail facilities and more than 1,600 car parking spaces. This would create a completely unacceptable rise in traffic that would have a disproportionate impact on residents of the Dargle area of Bray.

At the time of Census 2022, there were 11,935 housing units in the town of Bray. In advance of this proposed development, the number of residential units in the town is due to increase by more than 34% in the next two-five years (from projects under construction, or with planning approved or applied for). Sea Garden Phases 2 and 3 would bring this increase to more than 40%. This does not include significant current and planned development in areas of Dun Laoghaire-Rathdown that will impact Bray.

The Sea Garden Phase 2 planning application outlines transport options for the occupants of the new residential units, including bus, DART, cycling and walking, and the infrastructure required to support these alternative modes of mobility to the car. However, the time horizon for these alternatives is not in the immediate future, but long after the Sea Garden Phase 2 is a new community.

Pending the installation of this additional infrastructure, some many years hence, we share the concern of the Alliance of Bray Residents that the level of reliance on the private car by those living in Sea Gardens will be much higher than the developers assume.

Of particular concern to residents of the Dargle area is that the only vehicular access to this development will be off the Dublin Road at Sunnybank opposite the Upper Dargle Road. The Dublin Road is already 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) plus traffic to and from the proposed retail and commercial units. Residents living in the Dargle area fear that this would inevitably lead to greatly increased traffic, creating gridlock not only on the Dublin Road but also on the Upper and Lower Dargle Roads that lead to the Fassaroe junction with the N11. The Lower Dargle Road and adjacent roads are narrow residential roads where two cars often cannot pass each other and they already suffer from congestion and long lines of traffic. In terms of road safety, children regularly cross the Lower Dargle Road to access the People's Park via three entrance points. Any increase in traffic in this road would present an increased risk to these children.

Data collected for the 2023 AECOM report on the Bray Bus Priority and Decongestion Scheme clearly demonstrates that on weekdays over 80% of Bray traffic is local, with vehicle journeys either starting, ending or both starting and ending in Bray. The resulting congestion is the key issue that negatively affects quality of everyday life for residents and workers in the town.

The Wicklow County Development Plan 2022-2028, and the Bray Local Area Plan 2018-2024 lack a vision on how the congestion in Bray will be addressed. The new Bray Municipal District Traffic and Transport Sub-committee has only just started its work in this area. We share the concerns of the Alliance of Bray Residents that, given the need to develop a coherent and integrated Traffic and Mobility Plan for Bray, development of Sea Gardens Phase 2, with its reliance on vehicular access via a chronically congested road network, is premature.

Flood risk

Despite flood prevention works carried out to reduce the risk of flooding from the Dargle River, it is accepted that no flood defences can ever be 100% guaranteed. For residents living beside the Dargle River, any increased flooding risk to our community from this potential development is a risk not worth taking.

We're grateful to Save Bray for some of the excellent points they have raised in their submission to this application.

Mandatory Flood Risk Management Guidelines (the Sequential Approach) do state that building on flood plains should be based on avoiding building on land at a higher risk of flooding if land at a lower risk is available.

Flood Zone A has the highest flood risk. We note that the proposed Block E enclave is partially located in Flood Zone A and, while the applicant does propose to build a linear park in part of Flood Zone A, they are leaving the remaining part of that flood plain beside the flood defence wall for further development in Phase 3.

According to p5 of their ADS: 1: *"Phase 3, located adjacent to the River Dargle, is expected to accommodate approximately 362 residential units above a podium, including approximately 14,000sqm of retail and other uses. The building heights in Phase 3 will range from 6-9 storeys."* P39 of the FRA adds that it will: *"include 6 apartment blocks built on a podium. The ground floor beneath the podium is proposed to be lowered to 1.5m AOD and will serve as a carpark, raising the higher vulnerability residences off the ground and above the design flood protection level."*

If this Phase 2 proposal is allowed in its present form, this means that all of Phase 3 will have to be built on the remainder of Flood Zone A, next to the flood defence wall, with the public park obligation already fulfilled, because there will be no other available land left on this site on which to build the remainder of Wicklow County Council's target of 1,000 housing units on this site.

In line with the sequential approach, we submit that the additional 362 housing units should be assigned in this application to Flood Zone B.

As regards the very real potential flood risk associated with this development, the applicant's Flood Risk Assessment (FRA) itself recognises the risk in locating residential development on Flood Zone A, as the FRA includes: *"Emergency access*

and egress plans to evacuate to higher ground via access roads if needed" (p37); a proposal to raise "residential buildings and key access roads ... above the flood protection level of 3.5m AOD" (p43); "Demountable barriers and a water exclusion design strategy up to the flood protection level of 3.5m AOD" in some locations (p44); 'resilience measures', such as non-return valves, lifts fitted with a sump to allow for pumping of flood water, and raised electrical and gas fittings (p46); and a Flood Emergency Response Plan "in the event of a significant flooding or exceedance eventfor the building users and tenants within the site that are set below the flood protection level of 3.5m AOD" (p46). In addition, p28 advises that: "An external pedestrian escape to higher ground should be provided for the apartment blocks (part of the future Phase 3 of the development)".

Prematurity and the precautionary approach:

5.26 of Chapter 5 of the Flood Risk Management Guidelines states that, when a planning decision is required "where a review of a development plan is imminent", "a precautionary approach should be applied, and either the application should be refused on grounds of prematurity... or a flood risk assessment should be undertaken, and the Justification Test applied following advice in paragraphs below." The advice states that major proposals for development in areas of flood risk "should be considered as though the land was not zoned for development" and "Where the information is not sufficient to fully assess the issues involved, the development should not be approved on the basis of flood risk and / or on the grounds of prematurity prior to addressing flood risk as part of the normal review of the development plan for the area."

As the 2025 Local Area Plan (LAP) is currently being finalised, we ask that this application be refused on the basis of both flood risk and prematurity, and that our elected councillors be given the opportunity to review the proposed new LAP in terms of land use and flood zones before any decision is taken.

Environment, wildlife and visual amenity

Residents of the Dargle area have a strong connection with the environment and wildlife of this precious riparian landscape.

The whole area of the river walk that leads from the Fran O'Toole Bridge to the harbour is a habitat for birds such as swans, ducks, egrets, herons and more. It

leads down to a swan sanctuary that is of national and international importance. Currently there is relatively low disturbance of wildlife from noise, people and intrusive lighting along the river walk. A number of species of bats have also been recorded as using the river at night-time for feeding. Bats are a protected species that are especially threatened by artificial lighting.

If this application for Sea Gardens Phase 2 is allowed, then the resulting proposed siting in Phase 3 of six apartment blocks build on a podium, ranging from 6-9 stories, towering directly over the river walk flood defence wall, has the potential seriously to disturb the wildlife for whom this stretch of the river and river walk is an important riparian habitat – from increased noise, human oversight and intrusive lighting. It would also be visually intrusive on what is a much-treasured local amenity – a tranquil river walk where Bray residents can be immersed in and experience the river and its diverse wildlife.

We also object to the applicant's proposal to locate a 15-storey apartment Block E at the south-eastern junction of the site, near the river and railway track. We support the call to refuse permission for tall buildings close to the railway line and river to protect our colony of wild Mute Swans from injury, as the swan sanctuary is only 100 metres from the development site and the applicants acknowledge "*a potential risk of bird collisions, especially for species like swans that struggle with flight*", in particular with Block E, which "*due to its height, is considered the highest risk for bird collisions*".

In terms of visual amenity, the proposed location of apartment blocks along the river walk and seashore would present an unacceptable visually intrusive element in areas of natural recreation for local residents such as the river walk and coastal walk above the north beach. Wherever Block E is located, its proposed height of 15 stories will be completely overbearing and out of character with its surroundings.

These considerations further support the argument for allowing our councillors to review the zoning as part of the completion of the upcoming LAP before any decisions are given on this planning application.

In conclusion

DARA is fully supportive of the sustainable development of Bray to provide much-needed housing once issues around flood risks, traffic and congestion and protection of our local wildlife are addressed.

2022

LETTER: Lighting Plan for proposed
development at Harbour Point, Bray,
Co. Wicklow.



AN COIMISIÚN PLEANÁLA

28 OCT 2025

LTR DATED _____ FROM APP

LDG. _____

APP. PL-500165-WW

Dr Tina Aughney
Bat Eco Services

Bat Eco Services, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan. A82 XW62.

Licensed Bat Specialist: Dr Tina Aughney (tina@batecoservices.com, 086 4049468)

NPWS licence C13/2020 (Licence to handle bats, expires 31st December 2022);

NPWS licence 08/2020 (Licence to photograph/film bats, expires 31st December 2022) ;

NPWS licence DER/BAT 2022-36 (Survey licence, expires 24th March 2025).

Statement of Authority: Dr Aughney has worked as a Bat Specialist since 2000 and has undertaken extensive survey work for all Irish bat species including large scale development projects, road schemes, residential developments, wind farm developments and smaller projects in relation to building renovation or habitat enhancement. She is a monitoring co-ordinator and trainer for Bat Conservation Ireland. She is a co-author of the 2014 publication *Irish Bats in the 21st Century*. This book received the 2015 CIEEM award for Information Sharing. Dr Aughney is a contributing author for the Atlas of Mammals in Ireland 2010-2015.

All analysis and reporting is completed by Dr Tina Aughney. Data collected and surveying is completed with the assistance of a trained field assistant.

Mr. Shaun Boyle (Field Assistant) NPWS licence DER/BAT 2022-37 (Survey licence, expires 24th March 2025).

To whom it may concern:

Bat Eco Services was requested Atkins, on behalf of client, to undertake a bat survey of proposed development lands at Harbour Point, Bray, Co. Wicklow. This was completed in 2020 (report dated 16/10/2020).

Citation: Bat Eco Services (2020) Bat assessment prepared for Proposed Planning Application. Harbour Point, Bray, Co. Wicklow. Unpublished report prepared for Atkins.

In 2022, Atkins requested a review of the lighting plan for the proposed development (Phase 1, Coastal Quarter). In the bat assessment report, mitigation measures relating to lighting was presented in detail in order to reduce potential impact on local bat populations. These mitigation measures were in accordance with the BCT Lighting Guidelines (2018).

Bat Conservation Trust (2018) Bats and artificial lighting in the UK: bats and the built environment series. Guidance Note 08/2019. BCT, London.

The mitigation measures from the bat assessment report is as follows:

(Taken from page 40-41, bat assessment report)

"Lighting Plan

It is important that any proposed lighting for the proposed residential development is wildlife friendly and that there is a provision for continued dark zones to facilitate movement of light sensitive bat species such as Daubenton's bats.

Nocturnal mammals are impacted by lighting. Therefore it is important that lighting installed within the proposed development site is completed with sensitivity for local wildlife while still providing the necessary lighting for human usage. It is also important that developments reduce their impact on the night sky and reduce sky glow. The "Dark Sky" principal should be followed – i.e. no upward lighting to reduce light pollution. The following principles should be followed:

- *Luminaire design for any street lighting or lighting on buildings is extremely important to achieve an appropriate lighting regime. Luminaires come in a myriad of different styles, applications and specifications which a lighting professional can help to select. The following should be considered when choosing luminaires. This is taken from the most recent BCT Lighting Guidelines (BCT, 2018).*
 - *All luminaires used will lack UV/IR elements to reduce impact.*
 - *LED luminaires will be used due to the fact that they are highly directional, lower intensity, good colour rendition and dimming capability.*
 - *A warm white spectrum (<2700 Kelvins will be used to reduce the blue light component of the LED spectrum).*
 - *Luminaires will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.*
 - *Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible. Ballard lighting should be considered for pedestrian and greenway areas, if deemed necessary.*
 - *Only luminaires with an upward light ratio of 0% and with good optical control will be used.*

- *Luminaires will be mounted on the horizontal, i.e. no upward tilt.*
- *Any external security lighting will be set on motion-sensors and short (1min) timers. The intensity of external lighting should be limited to ensure that skyglow does not occur in order to reduce light pollution.*
- *As a last resort, accessories such as baffles, hoods or louvres will be used to reduce light spill and direct it only to where it is needed.*

In addition to above the following should also be followed:

No lighting, where possible, should be erected in the following areas:

- *Along treeline boundaries.*
- *Along the southern boundary adjacent to the River Dargle.*
- *Within and adjacent to retained woodland habitat.*
- *In vicinity of alternative roosting sites (includes bat boxes, Rocket bat boxes, Bat walls etc.)*

The lighting plan for cycle routes and pedestrian walkways should strictly adhere to the guidelines listed above. Where possible, no lighting should be installed or bollard lighting/dim lighting (lighting that dims or turns off during the night when humans are less active) should be considered. There is no lighting in the People's Park and as a consequence, there was a high level of bat activity along the river bank within this area. This type of scenario is important to replicate to ensure that there is dark corridors through our urban area to allow nocturnal wildlife to operate effectively."

In consultation with Atkins, Atkins confirmed that the points presented above have been incorporated into the lighting design and that the shortest column height, without conflicting with engineering designs, have been set at 6m.

As part of this review, the outdoor lighting report (dated 1/7/2022) was examined. Luminaire D and F have a Kelvin value of 3,000 Kelvins, which exceeds the Kelvin value recommended by the BCT Lighting Guidelines. All other luminaires meet the BCT Lighting Guidelines.

The Horizontal illuminance map indicates that average LUX level is 5.52 (range 1.09 to 22.50). The illuminance map indicates that the lighting spill is controlled to be 0.1 LUX along the majority of the boundary of the proposed development. All European bat species, including Irish bat species, are nocturnal. Light levels as low as typical full moon levels, i.e. around 0.1 LUX, can alter the flight activity of bats (Voigt *et al.* 2018). Any level of artificial light above that of moonlight can mask the natural rhythms of lunar sky brightness and, thus, can disrupt patterns of foraging and mating and might, for instance, interfere with entrainment of the circadian system. Therefore it is important that landscaping, to act as a buffer, is considered for areas where lighting spill is greater than 0.1 along the boundary of the proposed development (e.g. eastern boundary).

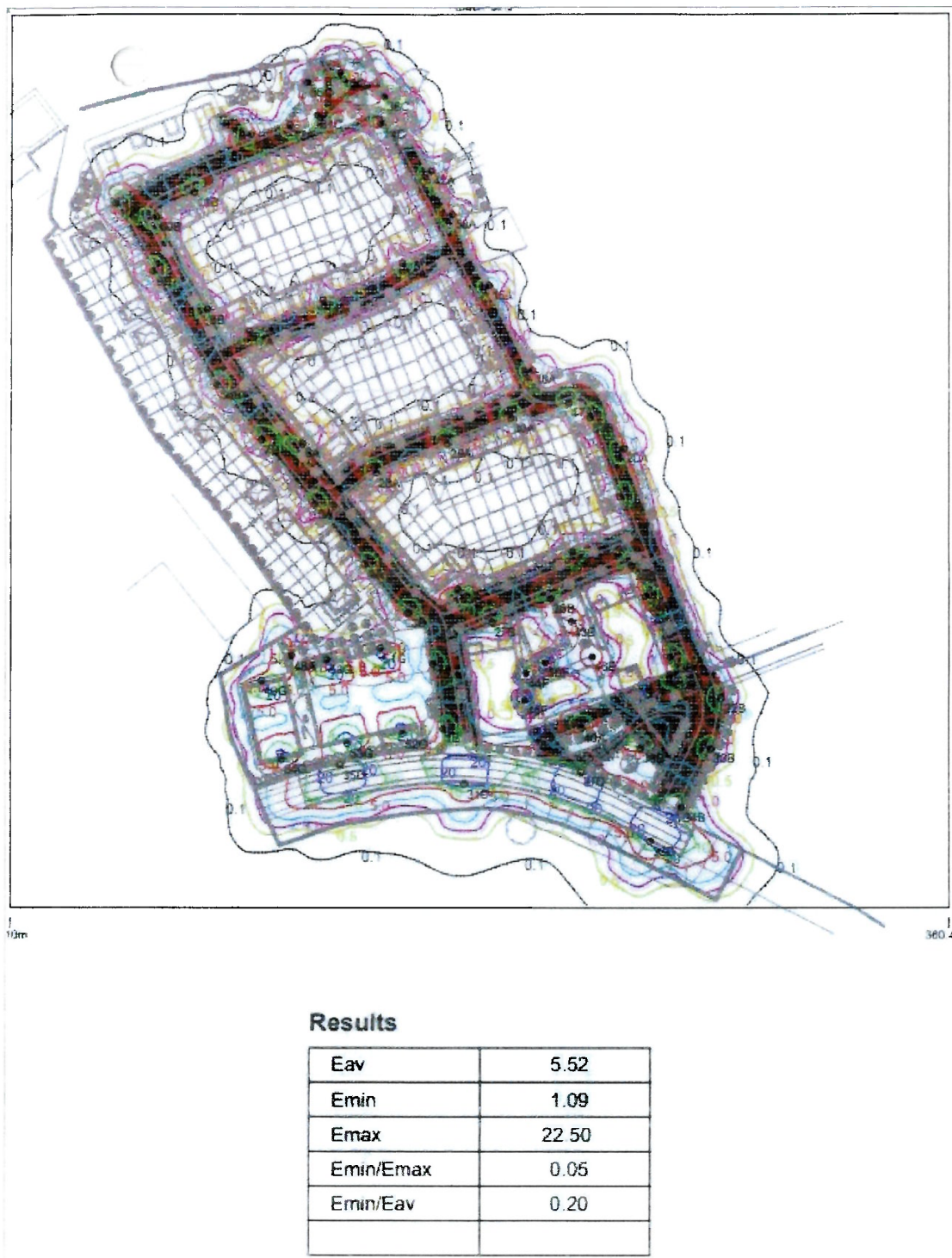


Figure 1: Horizontal Illuminance map – taken from Outdoor Lighting Report (Source: Atkins).

The bat species recorded in the area of the Coastal Quarter are common Irish bat species (common pipistrelle, soprano pipistrelle and Leisler's bat). The first two bat species are considered to be Semi-tolerant (Category 3, Table 1) while the latter bat species is considered to be Light-tolerant (Category 2, Table 1).

Rydell (2006) divides bats into four categories in terms of their characteristic behaviours at street lamps. The four categories are based on bat size, wing morphology and echolocation call characteristics which were highlighted by Norberg and Rayner (1987) to determine flight speed, manoeuvrability, and prey detection capabilities of bats. Rydell (2006) stated that the large, fast flying bats, which are confined to open airspace, fly high over lit areas and are rarely observed near ground level. None of these, typically large free-tailed bats (e.g. large species of the family Molossidae), are found in Ireland. The second category are the medium-sized fast flying species, including the *Nyctalus* species, which patrol the street well above the lights and can be seen occasionally as they dive for prey into the light cone. This group includes the Leisler's bat, which is found in Ireland. Rydell's third category describes the small but fast flying bats that are manoeuvrable enough to forage around light posts or under the lights, and includes the small *Pipistrellus* species of the old world, three of which are found in Ireland. The fourth category includes broad-winged slow flyers, most of which are seldom or never observed at lights. Slow flying bat species may be more vulnerable to predation by diurnal birds of prey and this may restrict their exploitation of insects around artificially illuminated areas (e.g. Speakman 1991). There are also the concerns that some bat species are more light sensitive and therefore actively avoid lit up areas. This is particularly relevant for lesser horseshoe bats. Therefore from this, we can categorise the suite of Irish bats species as follows (please note that the sensitivity category is the author's description):

Table 1. Potential light sensitivity of the Irish bat fauna using categories described by Rydell, 2006.

Species: Common Name	Rydell Category	Sensitivity
Daubenton's bat <i>Myotis daubentonii</i>	Category 4	Light sensitive
Whiskered bat <i>Myotis mystacinus</i>	Category 4	Light sensitive
Natterer's bat <i>Myotis nattereri</i>	Category 4	Light sensitive
Leisler's bat <i>Nyctalus leisleri</i>	Category 2	Light tolerant
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	Category 3	Semi-tolerant
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Category 3	Semi-tolerant
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Category 3	Semi-tolerant
Brown long-eared bat <i>Plecotus auritus</i>	Category 4	Light sensitive
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Category 4	Light sensitive

Due to the pattern of the proposed lighting plan, the internal area of the development are unlikely to be accessed by local bat populations as lighting essentially acts as a barrier to commuting and foraging bats. Therefore it is essential that the overall proposed development scheme for Harbour Point considers the following points:

- Areas of suitable bat habitat remaining in the landscape post development and are located along the boundary of the proposed development are part of a continuous dark zone that allows nocturnal animals, including bats, to travel during the hours of darkness. These dark zones should be connected to the wider landscape such as the River Dargle and the People's Park located south of the proposed development, woodland are to the north and to the coastal area to the east of the proposed development.

- Greater consideration in lighting plans to use dynamic lighting controls to reduce lighting outside the prime hours of human activity (Voigt *et al.*, 2018).

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Dr Tina Aughney.

References

- Norberg U.M. and Rayner J.M.V. (1987). Ecological morphology and flight in bats (Mammalia; Chiroptera): wing adaptations, flight performance, foraging strategy and echolocation. *Philosophical Transactions of the Royal Society of London. Series B, Biological Sciences*. **316**: 335-427.
- Rydell J. (2006). Bats and their insect prey at streetlights. In C. Rich and T. Longcore (eds.) *Ecological Consequences of Artificial Night Lighting*. 43-60.
- Speakman, J.R. (1991) Why do insectivorous bats in Britain not fly in daylight more frequently? *Funct. Ecol.* 5, 518–524.
- Voigt C.C., Azam, C., Dekker, J., Feguson, J., Fritze, M., Gazaryan, S., Holker, F., Jones, G., Leader, N., Limpens, H.J.G.A., Mathews, F., Rydell, J., Schofield, H., Spoelstra, K., Zagmajster, M. (2018) Guidelines for consideration of bats in lighting projects. EUORBATS Publication Series No. 8. UNEP/EUROBATS Secretariat, Bonn.

Fwd: Your submission has been sent

1 message

Frances Gaynor <frances.gaynor@gmail.com>
To: print.lbfr@gmail.com

20 October 2025 at 11:04

On my way to collect. Thanks

Frances Gaynor

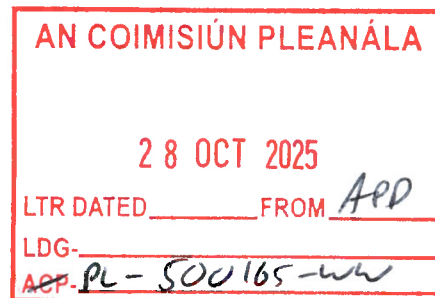
----- Forwarded message -----

From: **Dargle Residents Association** <dargleres@gmail.com>
Date: Sun 19 Oct 2025, 2:57 PM
Subject: Fwd: Your submission has been sent
To: <frances.gaynor@gmail.com>

for D.A.R.A. Steering Committee
(Dargle Area Residents Association)

----- Forwarded message -----

From: **OnlinePlanning** <onlineplanning@planning.localgov.ie>
Date: Wed 23 Apr 2025, 6:09 PM
Subject: Your submission has been sent
To: <dargleres@gmail.com>



Dear Dargle Area Residents Association C/O Frances Gaynor,

Thanks for sending your submission regarding application 2560207.

Your submission has been assigned with Online Reference Number: 150000028182.

Your submission will be reviewed by Wicklow County Council and will be acknowledged if the planning authority considers that it complies with regulation.

You are advised that no fee shall be payable if a submission or observation is accompanied by a copy of the acknowledgement from the Planning Authority of the original submission/observation. **Failure to furnish a copy of either the signed acknowledgement or the appropriate fee will result in your submission/observation being deemed invalid and returned to you** (No fee payable if a Prescribed Body)

Your submission will be returned if the planning authority considers that it does not comply.

Yours faithfully,
Wicklow County Council

A Chara,

Go raibh maith agat as d'aighneacht maidir le hiarratas 2560207 a chur chugainn.

Tugadh an Uimhir Thagartha Ar Líne seo do d'aighneacht: 150000028182.

Déanfaidh Wicklow County Council athbhreithniú ar d'aighneacht agus admhófar sin má mheasann an tÚdarás Pleanála go bhfuil sé ag cloí leis na rialacháin.

Cuirfear d'aighneacht ar ais chugat má mheasann an tÚdarás Pleanála nach bhfuil sí ag cloí leis na rialacháin.

Cuirtear in iúl duit nach gá aon táille a íoc má tá cóip den admháil a fuarthas ón Údarás Pleanála don aighneacht/tuairim bhunaidh á cur isteach i gcomhar leis an aighneacht nó tuairim. Sa chás nach gcuirtear an admháil shínithe nó an táille chuí ar fáil, measfar d'aighneacht/do thuairim a bheith neamhbhailí agus seolfar ar ais chugat í (Níl aon táille le híoc más Comhlacht Forordaithe atá i gceist).

Is mise le meas,
Wicklow County Council

***** This message is intended only for the use of the person(s) to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by LGMA (Local Government Management Agency). Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as LGMA does not accept any liability for contamination or damage to your systems. ***** Is faoi rún agus chun úsáide an té a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil leis an seoltóir a luaite is féidir. Ní hionann na tuairimí luaite sa ríomhphost seo agus tuairimí An Gníomhaireacht Bainistíochta Rialtais Áitiúil Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphost seo agus aon comhad atá nasctha leis scuabtha le bogearraí frithviorais chun viorais ríomhaire a aimsiú agus is cosúil go bhfuil siad glan. Bí cinnte an ríomhphost seo a mionscrúdú, mar ní ghlacann An Gníomhaireacht Bainistíochta Rialtais Áitiúil freagracht faoi aon damáiste a dhéanfaí le do chórais ríomhaireachtaí. *****



Little Bray <print.lbfr@gmail.com>

Fwd: Payment details regarding your submission

1 message

Frances Gaynor <frances.gaynor@gmail.com>
To: print.lbfr@gmail.com

20 October 2025 at 11:04

Frances Gaynor

----- Forwarded message -----

From: **Dargle Residents Association** <dargleres@gmail.com>
Date: Wed 23 Apr 2025, 6:11 PM
Subject: Fwd: Payment details regarding your submission
To: Frances Gaynor <frances.gaynor@gmail.com>

Copy receipt for DARA submission (20 euro)

----- Forwarded message -----

From: **OnlinePlanning** <onlineplanning@planning.localgov.ie>
Date: Wed, Apr 23, 2025 at 6:09 PM
Subject: Payment details regarding your submission
To: <dargleres@gmail.com>

Dear Dargle Area Residents Association C/O Frances Gaynor,

We have received your payment in regard to submission with Online Reference Number 150000028182.

Please find payment details below:

- Amount: €20.00
- Receipt No.: 57972
- Payment Transaction No.: 17454280910499312
- CRM Transaction No.: 150000028182
- Planning Application Reference No.: 2560207

Paid on: 23/04/2025 06:08pm

Yours faithfully,
Wicklow County Council

A Dargle Area Residents Association C/O Frances Gaynor, a chara,

RE: 150000028182.

Is maith linn a dheimhniú leat go bhfuarthas d'íocaíocht fa choinne do aighneacht le uimhir thagartha ar líne.

Féach thíos, le do thoil, na sonraí admhála:

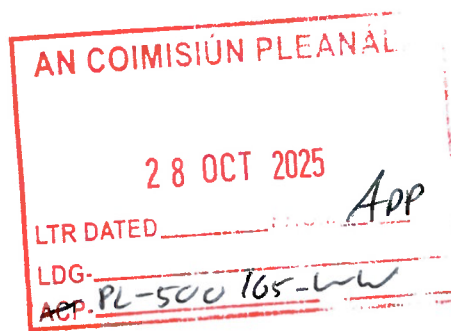
- Méid: €20.00
- Uimhir Admhála: 57972
- Uimhir Íocaíochta Idirbhirt: 17454280910499312
- Uimhir CRM Idirbheart: 150000028182
- Uimhir Thagartha d'Iarratais Pleanála: 2560207

Íochta ar: 23/04/2025 06:08pm

Is mise le meas,
Wicklow County Council

***** This message is intended only for the use of the person(s) to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by LGMA (Local Government Management Agency). Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as LGMA does not accept any liability for contamination or damage to your systems. ***** Is faoi rún agus chun úsáide an té a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil leis an seoltóir a luaithe is féidir. Ní hionann na tuairimí luaite sa ríomhphost seo agus tuairimí An Gníomhaireacht Bainistíochta Rialtais Áitiúil Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphost seo agus aon comhad atá nasctha leis scuabtha le bogearraí frithviorais chun viorais ríomhaire a aimsiú agus is cosúil go bhfuil siad glan. Bí cinnte an ríomhphost seo a mionscrúdú, mar ní ghlacann An Gníomhaireacht Bainistíochta Rialtais Áitiúil freagracht faoi aon damáiste a dhéanfaí le do chórais ríomhaireachtaí. *****

--
for D.A.R.A. Steering Committee
(Dargle Area Residents Association)





THIS IS AN IMPORTANT DOCUMENT

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

Wicklow County Council

PLANNING APPLICATION REFERENCE No: 2560207

A submission/observation in writing, has been received from Dargle Area Residents Association C/O Frances Gaynor on 23/04/2025 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 and will be taken into account by the planning authority in its determination of the planning application.

Yours faithfully,
Wicklow County Council

IS DOICIMÉAD TÁBHACHTACH É SEO

COINNIGH AN DOICIMÉAD SEO SLÁN. BEIDH ORT AN ADMHÁIL SEO A CHUR AR FÁIL DON BHORD PLEANÁLA MÁS MIAN LEAT ACHOMARC A DHÉANAMH IN AGHAIDH CHINNEADH AN ÚDARÁIS PHLEANÁLA. IS É SEO AN tAON FHIANÁISE AMHÁIN ATÁ ANN A NGLACFAIDH AN BORD PLEANÁLA LEIS GUR CUIREADH AIGHNEACHT FAOI BHRÁID AN ÚDARÁIS PHLEANÁLA MAIDIR LEIS AN IARRATAS.

Wicklow County Council

UIMHIR THAGARTHA AN IARRATAIS PHLEANÁLA: 2560207

Maidir leis an iarratas pleanála thuasluaite fuarthas aighneacht/tuairim i scríbhinn ó Dargle Area Residents Association C/O Frances Gaynor ar 23/04/2025.

Íocadh an táille chuí de €20. (Ní chaithfidh comhlachtaí forordaithe aon táille a íoc)

Tá an aighneacht/tuairim ag teacht leis na forálacha cuí atá i Rialacháin Phleanála agus Forbartha 2001 agus cuirfidh an tÚdarás Pleanála sin san áireamh agus é ag déanamh cinneadh ar an iarratas pleanála.

Is mise le meas,
Wicklow County Council

