

File With

SECTION 131 FORM

Appeal No

PL-500165-WW

Defer Re O/H

☐

Having considered the contents of the submission dated/received **24/11/2025** from **Dermot O'Brien** I recommend that section 131 of the Planning and Development Act, 2000 ~~be~~/not be invoked at this stage for the following reason(s):

no m planning issue

Section 131 not to be invoked at this stage

☒

Section 131 to be invoked — allow 2/4 weeks for reply

☐

Signed



EO

Date

26/11/25

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date

27/2/56

Observation

Page 1 of 2

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

Observation Details

Latest Appeal Lodged Date
28/10/2025

Last Date for Receipt of Observations
24/11/2025

Correspondence Details

Correspondence Type
Observation

Received From
Dermot O'Brien

Lodged On
24/11/2025

Validity
Valid

Valid OH Req
No

Issue
BP40 — English

Participant
Dermot O'Brien

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

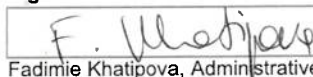
Signed


Catherine Flynn, Executive Officer

Date

25/11/2025

Signed


Fadimie Khatipova, Administrative Assistant

Date

26/11/25



An
Coimisiún
Pleanála

Planning Appeal Online Observation

Online Reference
NPA-OBS-005705

fee-pay-000567 ✓

Online Observation Details

Contact Name
Dermot OBrien

Lodgement Date
24/11/2025 14:56:32

Case Number / Description
500165

Payment Details

Payment Method
Online Payment

Cardholder Name
Dermot OBrien

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☐ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3SX1BsB1CW0EN5FC1JDcwAY

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

File With

SECTION 131 FORM

Appeal No

ABP—

Defer Re O/H

☐

Having considered the contents of the submission dated/received
from I recommend that section 131 of the Planning
and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

Section 131 not to be invoked at this stage.

☐

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

Date

EO

Signed

Date

SEO/SAO

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA

Observation to An Coimisiún Pleanála

Re: Wicklow County Council Planning Ref. 25.60207

An Coimisiún Pleanála Ref. PL27.500165

From Cllr. Dermot O'Brien

I wish to make the following Observation regarding the decision of Wicklow County Council to grant permission to Shankill Property Investments for Phase 2 of the proposed development on the former Bray Golf Club lands.

1. Flood Risk and Open Space Allocation

Phase 2 includes a 2-hectare public park which forms part of the wider MasterPlan for the site. The proposed location for this park is within Flood Zone B. The developer's MasterPlan indicates that, once this park is delivered, their open-space obligations will be considered fulfilled, after which they intend to seek permission for higher-density development on lands within Flood Zone A.

A number of residents have suggested that the public park would more appropriately be located on the lower-lying lands within Flood Zone A, enabling higher-density housing to be situated on the higher and less vulnerable areas of the site. This adjustment would reduce long-term flood exposure without reducing overall housing output.

This alternative aligns with the sequential approach set out in the **Planning System and Flood Risk Management Guidelines**, particularly regarding the selection of appropriate land uses and safeguarding areas required for flood conveyance and storage.

2. Interrelationship With the Wider MasterPlan and Part VIII Proposal

The application forms part of a larger MasterPlan and cannot be fully assessed in isolation.

The proposed sustainable transport bridge (Part VIII, published 2021) remains unconsidered by the elected members of Wicklow County Council and has not yet undergone the legally required environmental assessments. Nevertheless, the Further Information process requested the applicant to detail how Phase 2 would integrate with this unapproved infrastructure proposal.

A significant number of valid submissions to the Council raised concerns regarding flood risk, ecological impacts, road safety audit findings, and the implications for public transport routes. Only traffic was substantively addressed in the Further Information request. These unresolved considerations are material to the overall coherence and sequencing of the MasterPlan.

3. Prematurity

Having reviewed the information provided, there is a strong case that granting permission for Phase 2 at this time is premature. The following points are relevant:

- **Phase 1a** of the development is currently subject to Judicial Review.

- **Phase 2** contains the principal open space for the entire MasterPlan, while **Phase 3**, which includes lands within **Flood Zone A**, has not yet been determined.
- The **OPW Map Update – Bundle I project** (MR010 for Bray) is ongoing, with the hydrological assessment underway and updated flood maps scheduled for publication in **Q4 of this year**. These will provide the first comprehensive post-defence assessment of flood risk along the Dargle.
- The request for Phase 2 to demonstrate integration with the unapproved **Part VIII bridge proposal**, which has not yet been considered by the elected members of the planning authority, raises concerns about sequencing and procedural clarity.

Given these circumstances, proceeding with Phase 2 ahead of these key determinations would conflict with the precautionary approach required under the **Flood Risk Management Guidelines** (Section 5.26).

4. Development Plan Context

The **Bray Local Area Plan (LAP) 2025** is currently at Draft stage. Flood-risk mapping, land-use allocation, and open-space configuration for this strategic site will form part of the LAP evaluation framework.

In such circumstances, where updated flood mapping and a new LAP are imminent, the Guidelines indicate that applications may be refused on grounds of **prematurity pending the plan review**, particularly where significant uncertainties remain regarding flood risk and zoning implications.

Conclusion

For the reasons outlined above—namely:

- Incomplete and evolving flood-risk information
- Unresolved issues regarding the role and location of the proposed 2-hectare public park
- Outstanding environmental and procedural matters relating to the Part VIII bridge proposal
- The strategic importance of this site within the Draft Bray LAP
- The current Judicial Review affecting Phase 1a

—I submit that permission for Phase 2 is premature and should not be upheld at this time.

Name: Dermot O'Brien

Address: 68 Fairyhill, Bray, Co. Wicklow

Councillor, Bray Municipal District

Date: 24/11/25