



PLANNING REPORT & STATEMENT OF CONSISTENCY

Coastal Quarter SHD 2 Planning Application



IE000468
Coastal Quarter Strategic
Housing Development No. 2
Planning Report & Statement
of Consistency
F01
15th September 2022

PLANNING REPORT & STATEMENT OF CONSISTENCY

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1 INTRODUCTION

1.1 Nature of Application

RPS, West Pier Business Campus, Dún Laoghaire, County Dublin, in association with a multidisciplinary team has been instructed to submit this application to An Bord Pleanála (the Board) relating to lands off the Dublin Road and Ravenswell Road within the former Bray Golf Course lands, Bray, County Dublin and County Wicklow within the administrative areas of Dún Laoghaire-Rathdown County Council (DLRCC) and Wicklow County Council (WCC) on behalf of Shankill Property Investments Ltd., One Royal Canal Ave, Royal Canal Park, Ashtown, Dublin, D15, DKW4.

This application is made in accordance with the provision of section 4 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (the Act of 2016) and the *Planning and Development Regulations 2001 - 2021* (the Planning Regulations).

The application documentation provided has been prepared within inputs from the following team:

- Planning Consultant: RPS
- Master Planner: Glenn Howells Architects
- Project Architect: Glenn Howells Architects
- Consultant Civil, Structural, M&E and Traffic Engineers: Atkins Global Consulting Engineers
- Landscape Architect: Park Hood Landscape Architects
- Arboriculture Consultant: Independent Tree Surveys
- Cultural Heritage Consultant: John Cronin & Associates
- Sunlight and Daylight Consultant & Verified Images: 3D Design Bureau
- Wind and Microclimate Consultant: BFluid.
- Fire Safety Consultant: BB7
- Ecologists: Atkins
- Environmental Impact Assessment Report Coordinator: Atkins
- Property Managers: Aramark

1.2 The Applicant

Shankill Property Investments Ltd. is an Irish property development company specifically set up to progress development at the subject site. Shankill Property Investments Ltd. is part of the Ballymore Group. The proposed development has been designed based on Ballymore's professional experience, best practice international examples and the considerations of WCC, DLRCC and ABP as set out in pre-application consultation. Ballymore aims to deliver high quality homes and residential amenity facilities on this site in order to create a sense of place, a vibrant community and a significant public realm contributing to the overall fabric of Bray and providing a logical extension to the town centre.

1.3 Background to Current Application

The application site has previously been subject of a Strategic Housing Development application and permission. Section 247 pre-application consultation was initially sought in June 2020 on behalf of Shankill Property Investments Ltd with Dún Laoghaire Rathdown County Council (Ref. No. PAC/SHD/161/20) and Wicklow County Council for development comprising of 570 no. residential units, a childcare facility and associated development at the former Bray Golf Club lands, off Ravenswell Road and Dublin Road, Bray, Co.Dublin. Meetings were held with the planning authorities on 12.08.20 and 22.07.20 respectively.

In September 2020 a request for a section 5 pre-application consultation for a strategic housing development was issued to An Bord Pleanála on behalf of Shankill Property Investments Limited for development

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comprising 564 no residential units (96 no. houses, 468 no apartments), childcare facility and associated site works. An Opinion was issued by An Bord Pleanála under ABP-308291-20.

An application for permission was subsequently sought under ABP-311181 for development comprising 591 no. residential units and c.1,336 sq.m of other uses comprising of a retail unit, 2 no. commercial units, a childcare facility and a café. A split decision permission was granted by Order of An Bord Pleanála. Permission was granted for 234 no. residential units, a childcare facility, café and retail unit, subject to a number of conditions. Permission was refused for two (Blocks A and B) of the four proposed apartment blocks.

In December 2021 a new request for a section 5 pre-application consultation for a strategic housing development at the subject site was issued to An Bord Pleanála on behalf of Shankill Property Investments Limited (ABP-312257-21). The pre-application consultation request was sought on the basis of a total of 564 No. units, a childcare facility, commercial units and a café. The development presented in this pre-application consultation request incorporated the development as previously permitted at the site under ABP-311181.

1.4 Scope of Current Application

As much of the overall proposed development is already permitted under ABP-311181, the pre-application consultation was focussed on the new proposed elements. An Opinion was issued by An Bord Pleanála on 08.06.22 under Ref ABP-312257-21. The Opinion identified two items that needed to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development. The first of these stated that,

“Further clarity / consideration / justification of the documents as they relate to what precisely is being proposed as part of any future proposed development, what the redline boundary encompasses. Regard being had to portion of the site permitted under SHD – 311181 and how any future proposal links with the approved portion of that permission. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

Having given further consideration of this issue we confirm that the current application seeks permission for 586 No. dwellings, a retail unit, 1 no. commercial unit (incorporating a gym and juice bar), a childcare facility and a café. This comprises:

- 234 no. residential units, a childcare facility, café and retail unit and associated site and landscaping development. This development comprises the development as previously permitted under ABP-311181. It comprises all of the houses and duplexes within the scheme as well as apartment Blocks C and D. The details of this development proposed in this current application are as previously permitted by ABP-311181 (including requirements of condition nos. 4d, 4e, 4f, 5h, 5a and 11).
- 352 no residential units, a commercial unit (incorporating gym and juice bar) and associated site and landscaping development. The development comprises the proposed Blocks A and B (where development was previously refused permission under ABP-311181-21) and the immediately associated site development and landscaping works. Given the proposed new design responses to Blocks A and B it has been necessary to include revisions to the landscaped areas surrounding Blocks A and B also.

As the application comprises the entire scheme the redline boundary encompasses the full extent of development area of the previous application ABP-311181. It excludes an area that had previously been proposed for a construction compound (in line with a condition of ABP-311181).

1.5 Justification for Scope of Application

Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016 provides as follows:

“5.(1) Subject to subsection (2), a prospective applicant shall, before making the application in accordance with section 4 (1), make a request to the Board to enter into consultations with the Board in relation to the proposed strategic housing development and any such request shall comply with subsection (7).

(2) A prospective applicant shall, prior to making a request to the Board under subsection (1), have consulted the appropriate planning authority or authorities in whose area or areas the proposed development would be situated, comprising at least one meeting, as if the consultations with the planning authority or authorities concerned were for the purpose of making a planning application to it or to each of them, as the case may be, and for that purpose—

.....

(5) A request to the Board by a prospective applicant to enter into consultations with the Board shall be in writing and shall include—

(a) the following:

.....

(iii) a brief description of the nature and purpose of the development and of its possible effects on the environment;”

As set out in section 1.3 above, the scope and description of the development subject of section 247 consultation with Dún Laoghaire Rathdown County Council and Wicklow County Council was for a scheme incorporating 570 no. units. This comprised housing, duplex units and 4 No. apartment blocks.

The recent pre-application request to An Bord Pleanála under Ref. ABP-312257 described the prospective development as comprising of 564 No. units and associated development on the entire site. The Opinion issued by An Bord Pleanála refers to the proposed development as comprising 564 No. residential units, creche and associated site works.

Notwithstanding the fact that permission has already been granted for development on part of the site, the pre-application requests were made on the basis of the full development of the site. Accordingly, the current application formally incorporates and proposes the development as previously permitted under ABP-311181 as well as the development of Blocks A and B. All of the documentation submitted addresses the full proposed site development.

1.6 Legislative Basis for Application

In 2020 at the commencement of pre-application consultation for the development of the former Bray Golf Club lands the appropriate consenting route for the development was as Strategic Housing Development with permission to be sought from An Bord Pleanála. Since the previous application ABP 311181 was made at the site, new planning legislation providing for Largescale Residential Development (LRD) applications to local planning authorities has been introduced. Transitional arrangements for Strategic Housing Development still currently apply. Given the date of the recent pre-application request to An Bord Pleanála under ABP-312257 the SHD transitional arrangements apply in this case.

The SHD legislation is considered to have a number of advantages over the Large Scale Residential Development legislation in the particular circumstances of the subject site and proposed development. These are:

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- SHD legislation provides for a single application to be brought forward on this site which straddles two planning authority areas. The LRD legislation would require separate applications to Dún Laoghaire Rathdown County Council and Wicklow County Council
- The overall development at the former Golf Club lands comprises a single development and is required to be assessed as such under the EIA Directive. With SHD legislation the planning consent route would align with the EIA assessment approach.
- A single holistic view and assessment of the development provided for under the SHD legislation supports a more comprehensive and robust approach to planning assessment.

The proposed development generally consists of 586 no. residential units on lands zoned to accommodate residential use. As such, the proposed development falls within the definition of a Strategic Housing Development (SHD) as provided for by section 3 of the Act of 2016.

With reference to this definition, the development proposed comprises residential dwellings on lands zoned “A, *To provide residential development and improve residential amenity while protecting the existing residential amenities*” under the *Dun Laoghaire-Rathdown Development Plan 2022 – 2028* (DLR CDP) and on lands zoned “MU *To provide for mixed use development*” in the *Bray Municipal District Local Area Plan 2018 – 2024* (Bray MD LAP). While the application boundary includes lands zoned ‘F’, “*To preserve and provide for open space with ancillary active recreational amenities*”, under the DLR CDP no residential development is proposed thereon.

In respect of the zoning objectives, both the DLR CDP and Bray MD LAP confirm uses ‘Permitted in Principle’ or ‘Open for Consideration’ under the ‘A’ and ‘MU’ zoning objectives to include *inter alia* ‘residential’, ‘retail’, ‘commercial’ and ‘childcare facility’.

As the development is for greater than 100 no. dwellings and those dwellings are all proposed on land zoned for residential development, the proposal aligns with the definition of a SHD. The development also includes ancillary accommodation and additional infrastructure necessary to facilitate the overall development.

1.7 Content of Application

In accordance with articles 297 and 298 of the Planning and Development Regulations 2001 - 2022, the application for a proposed strategic housing development is accompanied by:

- A completed application form.
- A Letter of Consent to include lands within the ownership of Wicklow County Council dated 17th August 2022.
- The relevant page of the newspaper, or a copy of the relevant page, in which notice of the application has been published and a copy of the site notice erected on the land.
- A copy of the EIAR prepared for the proposed development and the EIAR Portal confirmation notice.
- A location map (BRA-GHA-SW-XX-DR-A-05001) marked so as to identify clearly (i) in red, the land or structure to which the application relates and the boundaries thereof, (ii) in blue, any land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application, (iii) in yellow, any wayleaves, and (iv) the position of the site notice or notices erected on the land.
- Site plans, elevations and floor plans screened with respect to the requirements of articles 297 and 298 of the Planning Regulations.
- Evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development dated 2nd September 2022.

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- Statement of design acceptance by Irish Water of the proposed water and sewer drawings, dated 31st August 2022. Connections to the network have been agreed in principle and will be finalised on receipt of planning approval.
- Details and other particulars as to how the applicant proposes to comply with a condition referred to in section 96(2) of the *Planning and Development Acts 2000* are provided in **Section 4.19**.
- A statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan (**Chapter 7** of this *Planning Report and Statement of Consistency*)
- A statement (*Statement of Material Contravention*) relating to where the proposed development materially contravenes the relevant development plan or local area plan other than in relation to the zoning of land, indicating why, in the prospective applicant's opinion, permission should nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.
- A statement of response (*Statement of Response*) responding to the opinion issued by the Board (ABP Ref. 312257-21) with respect to specific information to be submitted with any application for permission.
- A statement of proposals (*Statement of Proposals*) prepared in accordance with section 297(3) of the Planning Regulations responding to the opinion issued by the Board (ABP Ref. 312257-21) under section 6(7) of the Act of 2016.
- The appropriate fee.

We note that as per the section 8(1)(b) of the Act of 2016 and pursuant to the Planning Regulations:

- 2 no. printed copies and 3 no. electronic copies of the application and EIAR in relation to this proposed development are being submitted to the Board.
- 6 no. printed copies and 1 no. copy electronic copy of the application and EIAR in relation to this proposed development are being sent to each of the planning authorities; DLRCC and WCC.
- 1 no. printed copy together with 1 no. copy electronic copy of the application and EIAR in relation to this proposed development are being sent to each of the authorities listed in the opinion issued by the Board (ABP Ref. 3111821-21) under section 6(7) of the Act of 2016.

1.8 Purpose of this Report

Section 4 of the Act of 2016 outlines the requirements relating to making an application for permission for strategic housing development. It provides that such an application shall be so made only where the applicant has fulfilled the requirements set out in section 8. Section 8(1)(iv)(I) provides that the application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan. In accordance with section 8(1)(iv)(I), this *Planning Report and Statement of Consistency* (Report) illustrates how the proposed development will be consistent with the policies and objectives set out in the DLRCDP, *Wicklow County Development Plan 2016-2022* (WCDP) and the Bray MD LAP. This Report also sets out how the proposed development will be consistent with the *Draft Wicklow County Development Plan 2022-2028* (Draft WCDP) other planning policy documents and guidelines, as appropriate. In this regard **Section 7** of this Report provides a **Statement of Consistency**. Other sections of this Report provide further details in relation to the site location and context, development description and relevant planning history.

1.9 Format of Report

This Report is arranged under the following headings:

- **Section 1:** Introduction;
- **Section 2:** Site Context, Location and Description;
- **Section 3:** Planning History;
- **Section 4:** Description of Proposed Development;
- **Section 5:** Environmental Appraisals;
- **Section 6:** Assessment of Key Planning Issues;
- **Section 7:** Statement of Consistency with Planning Policy; and
- **Section 8:** Conclusion.

This Report should be read in conjunction with all plans and particulars submitted as part of the application.

2 SITE CONTEXT, LOCATION AND DESCRIPTION

2.1 Harbour Point Masterplan

Harbour Point comprises part of the former Bray Golf Club lands on the northern side of the Dargle River adjacent to Bray Harbour. The *Harbour Point Masterplan* has been prepared on behalf of the applicant following their acquisition of the lands to set out a logical and well considered development framework for an overall site of c.19 hectares located in Bray town (population 32,600 – 2016 census) just north of the town centre.



Figure 2-1: Harbour Point Location

Despite the central location within Bray, the overall site has remained isolated since it ceased operating as a golf club. The potential exists for the creation of a new high quality urban environment that connects with Bray town centre, the seafront, and the adjoining neighbourhoods and has the potential for seamless integration with the adjoining urban form.

Given the scale of the landholding, the urgent need for additional housing, the rapidly evolving market for commercial space and the statutory planning framework, the applicant has decided to advance the Coastal Quarter as the first phase of the *Harbour Point Masterplan*.

A logical division from the southern proposed River Quarter for the purposes of planning permission is the proposed public transport route that traverses the site and will cross the River Dargle on a proposed new sustainable transport bridge that is now subject of ongoing Part 8 procedures by WCC (Reg. Ref. PRR 21/869) and which also corresponds with the indicative alignment of the proposed green line LUAS extension to Bray. These quarters are illustrated in **Figure 2-2** below.

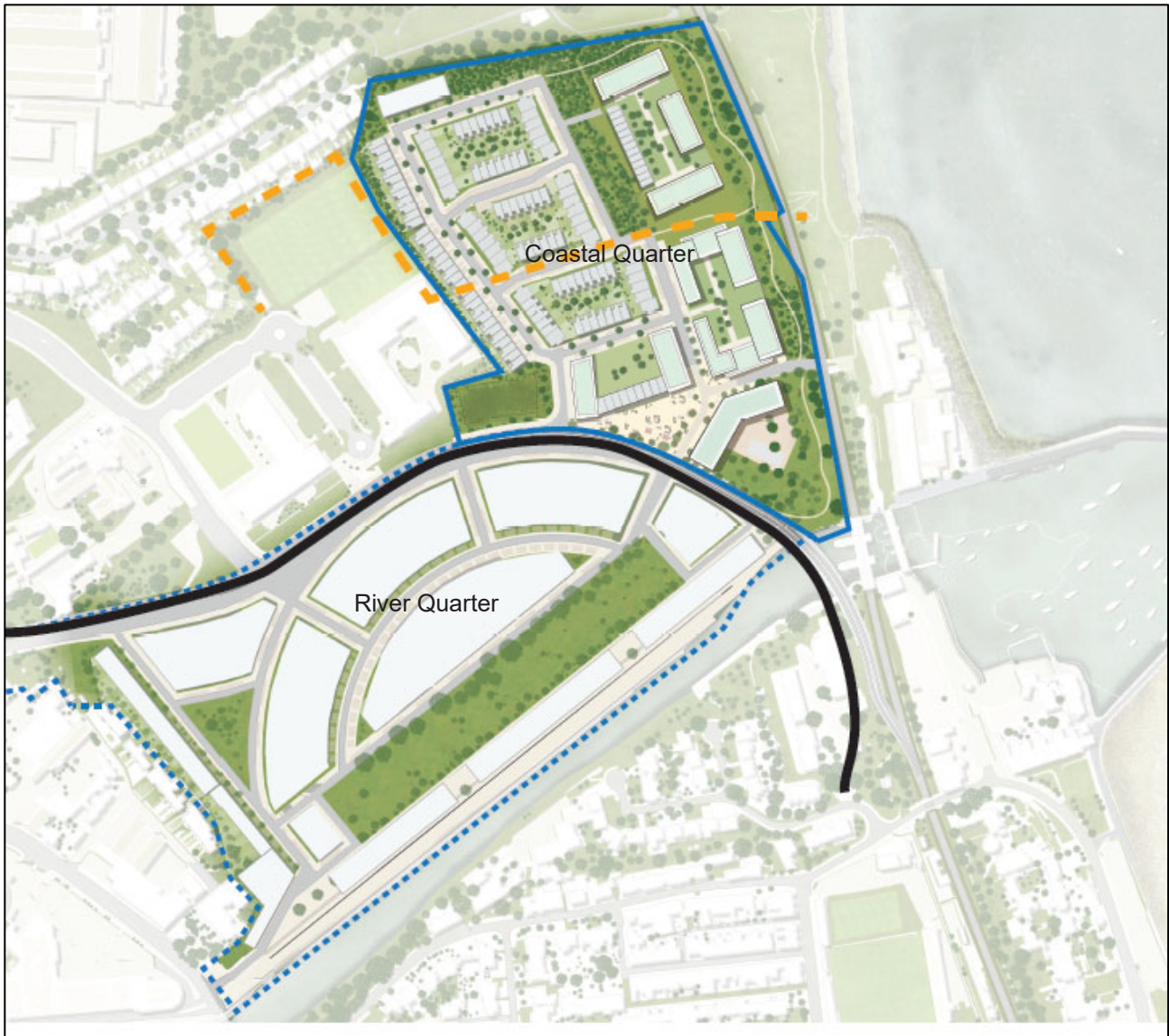


Figure 2-2: Coastal and River Quarters

Source: Harbour Point Masterplan

2.2 Application Site - Coastal Quarter

2.2.1 Location

The Coastal Quarter development area is approximately 7.84 hectares and straddles the administrative boundary of DLRCC and WCC. Approximately 3.65 hectares are located within DLRCC and approximately 4.19 hectares are located within WCC. The application site boundary extends to 8.81 hectares and includes areas to provide ancillary services and connections. The application site boundary is illustrated on **Figure 2-3** below and in more detail on Drawing No. BRA- GHA-SW-XX-DR-A-05001.

PLANNING REPORT & STATEMENT OF CONSISTENCY

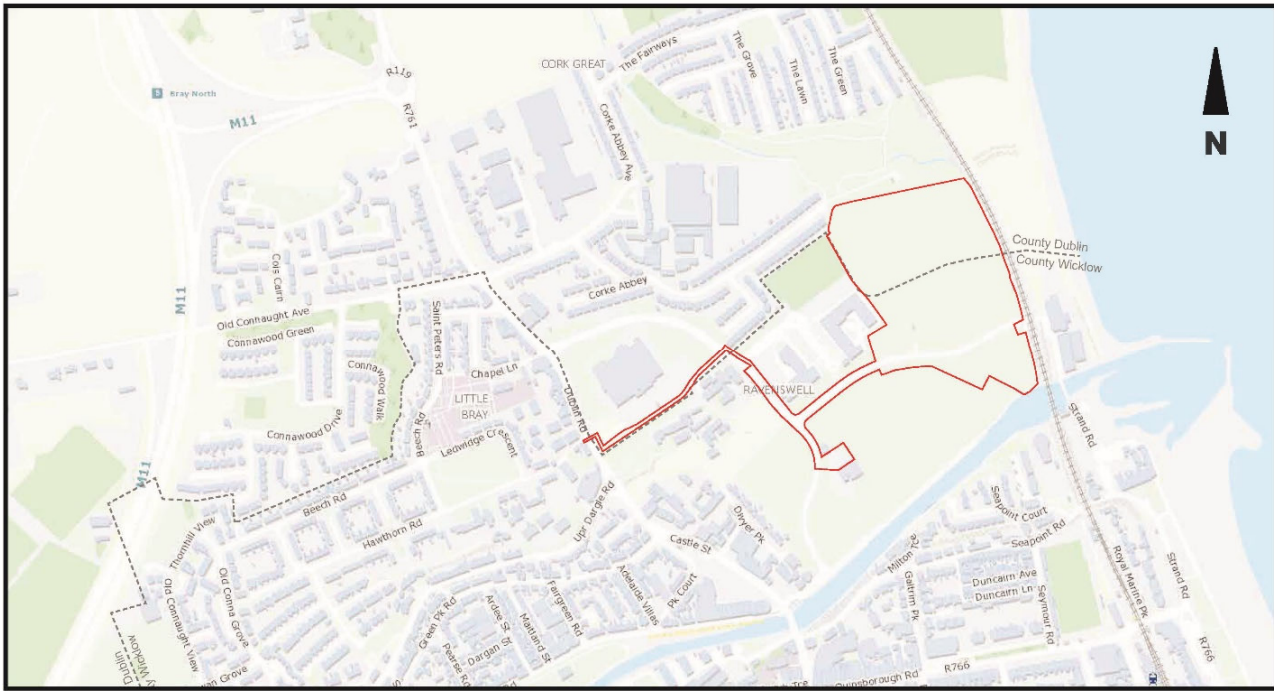


Figure 2-3: Site Location (indicative subject lands outlined in red)

Source: Open Street Map and RPS annotation

2.2.2 Context & Boundaries

To the south the River Dargle flows in an easterly direction meeting the Irish Sea in Bray Harbour c. 50m from the southeast extent of the site. This stretch of the river has been subject to flood alleviation works and the banks of the river have been recently developed into a formalised promenade and public amenity space. To the north of the site is the Corke Abbey Valley Park through which Rathmichael Stream flows in an easterly direction through wooded and grassland areas which have formalised public pathways throughout. There is a belt of woodland planting along the northern boundary which provides a strong landscape backdrop. This area is zoned in the DLRCDP as zoning objective 'F' *'To preserve and provide for open space and recreational amenity'*. To the east of the site the Dublin to Rosslare railway line forms a boundary for the entirety of the development site and becomes more elevated as it runs southwards, beyond which lies a coastal strip and the Irish sea. This area to the east of the railway line is zoned under the Bray LAP as *'MU Mixed Use'* and remains largely undeveloped. To the north west side of the development site is Corke Abbey residential estate, which is zoned in the DLRCDP as zoning objective 'A' *'to protect and/or improve residential amenity'*. Existing houses in this area are for the most part 2-storeys in height. To the west is Coláiste Ráithín, St. Philomena's Primary School and Ravenswell Primary School and the surrounding lands are zoned in the Bray LAP as *'MU Mixed Use'*, beyond which lies the Dublin Road and urban development of Bray town.

Grounds levels generally fall from north to south across the subject site with lands in the northern part located at a higher level than the lands to the south and adjacent to the Ravenswell Road, allowing views out to sea and towards Bray Head as a key backdrop to the south.

Further details are provided with respect to the characteristics of the site and the surrounding area within the *Harbour Point Masterplan* prepared by Glenn Howells Architects.

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2.2.3 Landscape, Habitat and Cultural Heritage

The subject site comprises of part of the former Bray Golf Course, with the landscaped areas consisting of green areas delimited by scattered trees and clusters, amenity grassland and the remnants of the golf course layout including sand bunkers around greens. The site is enclosed by modern palisade fencing on all sides, apart from some gaps which have been created overtime, and is fronted by a mature tree line to the north and flanked by the railway line to the east. Hard-standing surfaces are located within the southern and western portions of the site and drainage features are located throughout the interior.

The tree cover across most of the site is remnant planting associated with the former golf course use, with an area of more closely spaced woodland being located within the north west of the site. Most trees are semi-mature or early mature in age, with some older trees located along the northern boundary area and in small numbers across the central part of the site. A *Tree Survey Report*, undertaken by Independent Tree Surveys included as part of this application (EIAR, Volume 3), finds that the tree quality is generally low, with numerous smaller trees of relatively low value being spread around the old course.

The natural topsoil in this area consists of fine loamy drift with siliceous stones, while the underlying geology is composed of slate, schist and minor greywacke.

The habitat classification for the site can be categorised as scattered trees and parkland with large areas of amenity grassland. The site is located within the Dargle sub catchment (Sub catchment id 10-5). Both the River Dargle and the Rathmichael Stream are detailed by the Environmental Protection Agency (EPA) as having 'Good' water quality status (2013-2018) and are both detailed as being 'Not at Risk'. The River Dargle is designated as a Salmonid River. The lower stretches of the River Dargle, Bray Harbour and the surrounding coastal waters are classed as a monitoring site for the Irish Wetland Bird Survey (I-WeBS). Further details are provided in the *Natura Impact Statement* prepared by Atkins.

The subject site is located outside the northern end of the historic settlement of Bray (WI004-001----) and has been landscaped as a golf course since the late 19th century. Aerial images demonstrate the considerable development of the environs of the subject site from the 1990s onwards. From about this time the former golf club lands have been gradually reduced and segmented, firstly by the commencement of a large drainage project and associated infrastructure and more recently by the construction of an adjacent school and associated access roads. There is one recorded archaeological site located within the subject site and this comprises a linear earthwork (WI004-005----/DU026-124---) and forms the county boundary line. The feature presents itself along a low bank running on an NNE-WSW axis across the site. This feature is recorded as a 'possible linear earthwork' in the County Dublin edition of the Record of Monuments and Places (RMP). As detailed in the archaeological and built heritage assessment prepared by John Cronin and Associates (JCA) and reported in the *Environmental Impact Assessment Report* (EIAR), a number of archaeological investigations of this earthwork, undertaken in conjunction with adjacent developments, have produced evidence that the earthwork comprises an 18th/19th century landscape feature and is not a section of the 'Pale' ditch as had been previously postulated. There are a further seven recorded archaeological sites located within a 500m wide radius of the boundaries of the subject site, these are illustrated in the archaeological and built heritage assessment within the EIAR. There are no designated built heritage structures (Protected Structures or National Inventory Architectural Heritage) within, or in immediate proximity to, the proposed development lands.



Figure 2-4: Aerial image of the Subject Site

Source: Google Maps

2.2.4 Access

The site is accessed from the R761 (Dublin Road) via the recently constructed Northern Access Road (2018) (DLR Reg. Ref. D15A/0112, ABP Ref. PL06D244874) which forms the eastern and northern boundaries of Lidl (Industrial Yarns site) and the Southern Access Road which facilitates access from Castle Street via the Ravenswell Road.

The R761 (Dublin Road) provides connectivity to the M11 via the Wilford Interchange and to Dublin City via the R119. Connections to the south are via an existing road onto the R761 (Dublin Road) at Castle Street linking the site with Bray town centre and to the west via the Lower Dargle Road. The existing road network is shown in **Figure 2-5**.

Fran O'Toole Bridge (Castle Bridge) is located to the south-west and provides access over the River Dargle to Bray town centre, the rail line bridge crossing of the River Dargle is located to the south-east. There is a restricted vehicular underpass beneath the rail line providing access to lands lying to the north of Bray Harbour.

The applicant can confirm that Irish Rail and WCC have concluded a License Agreement allowing Wicklow County Council to continue to operate the underpass for pedestrian and cycle access on a 24 hour basis, along with installing appropriate and approved vehicle barriers on both approaches. The subject application does not propose to do any works to the underpass but rather facilitates connectivity to it as an alternative route to the River Walk which also provides high quality pedestrian and cyclist access to Bray Town Centre.

Ravenswell Road runs along the southern end of the site, it lies between the River Dargle and the former golf club lands and is currently a cul-de-sac.

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Figure 2-5: Existing & Future Road Network

Source: Traffic and Transport Assessment prepared by Atkins

2.2.5 Public Transport

The site is located c. 800m north of Bray Daly railway station providing Howth/Malahide to Greystones DART service, Dublin to Dundalk commuter services and main line rail services to Wexford and Rosslare Europort. Existing public bus routes run along the R761 (Dublin Road) providing access to the 45A, 45b, 84, 84A, 84N, 145, 155 and 184 services.

Emerging public transport options which will benefit the site include the:

- Proposed bus route via the proposed public transport bridge which is proceeding through a Part 8 consenting process. This bridge will provide for improved connectivity to the site but it is not required to serve the proposed development which will have appropriate access to the DART station via both the existing rail underpass and Riverwalk along with appropriate access to existing bus services along Dublin Road.
- The NTA are currently developing the BusConnects Scheme, which includes Corridor 13 Bray to UCD and City Centre. As the R761 lies on BusConnects Route 13 Bray to the City Centre, a full upgrade of the carriageway and associated junctions will be provided along the R761. The BusConnects Route 13 runs along the Dublin Road close to the site.

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- The future Luas proposals, as set out in the Greater Dublin Area Transport Strategy include the extension of Luas Green line to Bray. This line is not proposed to be developed until after 2035 but it is anticipated that the alignment will be adjacent the R761, into the development lands and into Bray Dart Station via the proposed Public Transport Bridge. The proposals for the Phase 2 Riverside Quarter of the full Masterplan Development will include for the provision for the potential of LUAS Stops within the development lands. The masterplan for the development lands takes cognisance of the provision of the Luas extension and its interface with the development.

The existing and emerging public transport facilities in the context of the subject site are illustrated in **Figure 2-6**.



Figure 2-6: Existing and Emerging Public Transport Facilities

Source: Traffic and Transport Assessment prepared by Atkins

2.2.6 Pedestrian and Cyclist Connectivity

There are existing pedestrian and cycle connections to Bray Daly railway station and Bray Promenade via the rail underpass. Existing connections to Bray town centre and the R761 (Dublin Road) are located along the River Dargle walkway and recently developed road infrastructure. There is an existing link between ‘The Green’ and ‘Corke Abbey’ north of the proposed development site and an existing connection from broader masterplan lands to the existing greenway route along the River Dargle and towards the town centre.

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Additional emerging connections, include:

- Wicklow County Council (WCC) is undertaking Part 8 approval procedures to carry out the design and construction of the Bray Sustainable Transport Bridge (Ref. PRR 21/869). The project has not yet been confirmed by the Planning Authority.
- Proposed Pedestrian & Cyclist Improvements on Castle Street Bridge (Fran O’Toole Bridge), provision of pedestrian and cycle footbridges either side of the existing bridge, to be provided by WCC.
- Improved pedestrian and cyclist facilities along the R761 Dublin Road provided as part of BusConnects - Core Corridor 13 Scheme.
- East Coast Greenway Scheme Greater Dublin Cycle Network route N5 – incorporated within WCC and DLRCC development plans.

As part of this development, it is proposed to facilitate a connection to the north into Corke Abbey Valley Park. Connections between the proposed multi use games area and the schools complex will also be facilitated.

The existing and emerging pedestrian and cycle connections in the context of the subject site are illustrated in **Figure 2-7**.



Figure 2-7: Existing and Emerging Pedestrian and Cycle Connections

Source: Traffic and Transport Assessment prepared by Atkins

2.3 Existing and Planned Infrastructural Upgrades

Key infrastructural developments that have been implemented or are planned which are relevant to the site have been considered and include:

- Irish Water Underground Foul Water Storage Tank:** An underground foul water storage tank is located within the subject site. The existing tank was constructed by DLRCC in 2011 – 2012 and is a critical piece of infrastructure associated with the Bray Pumping Station to the South of the River Dargle. The purpose of the tank is to store foul and/or storm water during exceedance events at Bray Pumping Station. During storm events, the tank and its associated infrastructure are utilised to limit the expected incidence of discharge from the Bray Pumping Station storm overflow to the Irish Sea to 3 times per bathing season and if practical via the foul outfall to 7 times per bathing season. When the storage tank is required during a storm event the wastewater is pumped from Bray Pumping Station to the tank via an existing rising main. When the storm event subsides the wastewater is returned via an existing gravity return sewer to the Bray Pumping Station prior to being pumping to Shanganagh Waste Water Treatment Plant. The requirements for the existing tank are outlined in the '*Shanganagh & Bray Main Drainage Scheme Wastewater Treatment Works*' Environmental Impact Statement which forms part of the EPA licence requirements (Ref. D0038-01). Access to the facility for maintenance must be provided for and there are limited uses which can be allowed above the facility. The subject proposals have sought to address this constraint imaginatively with a high quality design approach.



Figure 2-8: Irish Water Underground Foul Water Storage Tank

Source: <https://roadbridge.ie/wp-content/uploads/2018/01/0207-Shanganagh-Bray-Main-Drainage.pdf>

- River Dargle Flood Defence Scheme** - a key infrastructure project completed in October 2017 by WCC and the Office of Public Works (OPW). The €46m project involved the widening and deepening of the river channel, construction of flood walls and embankments along a 3.3km stretch from Silverbridge at the N11 to the Harbour Bridge at Bray Harbour. As well as providing flood defences to protect against a 1-in-100-year fluvial flood and 1-in-200-year tidal flood, the project included a new linear park at Ravenswell Road. The Flood Risk Assessment included as part of the Bray LAP demonstrates the likely flood extents with and without the scheme in place. An extract from the Bray LAP is illustrated on **Figure 2-9** below.

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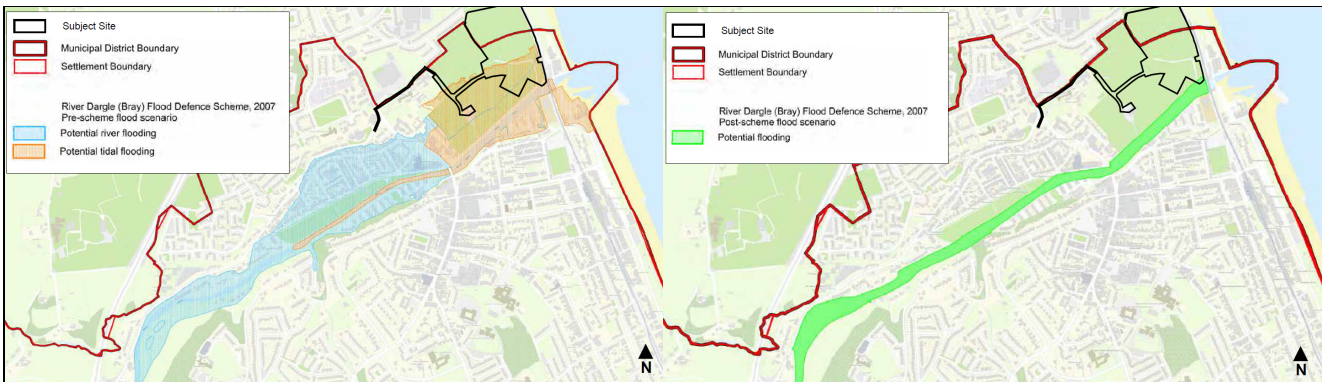


Figure 2-9: Flood Extents Pre and Post Works and Application Boundary

Source: Bray LAP Appendix C, RPS annotations

- DART Underpass** – WCC has confirmed that this link will remain in place as a result of a formal arrangement between it and Irish Rail thereby maintaining pedestrian and cyclist access beneath the railway line embankment to provide connections from the former Bray Golf Club lands to Bray Harbour and onwards to the promenade and Bray Daly railway station. This connection provides an alternative to route and link to the harbour, coastal area and across the river to Bray Daly railway station.
- Part 8 Public Transport Bridge** – under the Urban Development & Regeneration Fund (URDF) €3.4m is allocated to the construction of a public transport bridge spanning the River Dargle from the former Bray Golf Club lands. Wicklow County Council (WCC) is undertaking Part 8 approval procedures to for its proposed Bray Sustainable Transport Bridge (Ref. PRR 21/869). The project has not yet been confirmed by the Planning Authority. This connection will provide an alternative to route and link across the river to Bray Daly railway station and the coastal area.
- Bus Connects** - includes Core Bus Corridors which shall provide higher frequency and capacity bus services including measures such as dedicated lanes, higher quality stops, off-board ticketing and full priority at traffic signals. The proposed Bray Core Bus Corridor commences at the junction of Leeson Street Lower and St. Stephens Green and terminates at the Dargle River Crossing where it ties into the proposed Bray Bridge Scheme (Castle Street/Fran O’Toole Bridge). This route runs along the R761 (Dublin Road) approximately 550m to the west of the site. It is expected that the NTA shall submit the formal application to the Board for approval in the near future.
- DART Expansion Programme (DART +)** - will create a full metropolitan area DART network for Dublin with all lines linked and connected. The overall project consists of separate but interrelated projects to expand the heavy rail electrified commuter network in Dublin from the existing c. 50 km to c. 150 km across main routes primarily over existing alignments extending the DART system on the Maynooth Line, Kildare Line and the Coastal Line. Works to the southern end of the Coastal Line will increase capacity of the Bray-Greystones section to the city centre. This programme will further enhance the connectivity to Bray within the GDA.
- Green LUAS Line** – will be extended from Cherrywood (*Bride’s Glen*) to Bray Town Centre after the Green LUAS Line being upgraded to Metro in order to provide the necessary passenger capacity. While a decision on the final alignment has yet to be made, it is likely to run to Bray Daly railway station via Shankill and the former Bray Golf Club lands. It will provide a high frequency, high capacity link between Bray and the key employment areas of Sandyford, Dundrum and Cherrywood, in addition to connecting to the city centre. The proposed masterplan layout incorporates an alignment for the Luas to traverse the site. *Project Ireland 2040* provides indicative allocations toward the development of MetroLink and the LUAS Green Line Capacity Enhancement Project, while it also provides indicative allocations toward the appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg.

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- **Bray Harbour Area Integrated Regeneration** – Funding has been allocated under the Urban Regeneration and Development Fund for the regeneration of the Bray Harbour Area and releasing various sites for future development through a series of integrated elements. The aim is to deliver a vibrant public amenity that will be of great benefit to residents and visitors alike. Works envisaged include:
 - Amenity and Public Realm – an extension of amenity areas, improvement of the streetscape, parking, cycle provision and sporting facilities
 - Promenade Board Walk – linking the promenade with the harbour
 - Cycle Bridge – to relieve a pinch point at the Dargle Bridge crossing
 - Relocation of boat storage to the north of the harbour

The location and extent of a number of the approved schemes described above and their integration with the subject site are shown in **Figure 3-4**. The subject site provides for the logical contiguous growth of Bray town at a location which supports sustainable development. The site is proximate to all existing services and facilities within Bray, is serviced by existing high capacity public transport and will benefit further from planned bus and rail public transport upgrades.

3 PLANNING HISTORY

A desktop review of the planning history for the subject lands and its immediate surroundings was undertaken using WCC and DLRCC online planning search facility. A summary of the relevant planning history is set out herein. Any concerns or issues identified pertinent to the subject application have been considered in the design process and are addressed in so far as is possible.

3.1 Subject Lands

Within the former Bray Golf Course lands permission was recently granted for a strategic housing development in 2021. A significant residential development was previously permitted at the site in 2010. The details of each are set out below.

3.1.1 Consented Strategic Housing Development (ABP- 311181-21)

3.1.1.1 Nature and Extent of Development as Proposed in Application to ABP

On 20 August 2021, Shankill Property Investments Limited applied for permission for a Strategic Housing Development (SHD), comprising 591 no. residential units in a mix of apartment, duplex and house units. It was proposed that 278 no. units be located within the administrative area of DLRCC and 313 no. units be located within the administrative area of WCC. A childcare facility, café and commercial units were proposed to be, located in the WCC administrative area. Also proposed were all associated and ancillary development and infrastructural works, hard and soft landscaping and boundary treatment works, associated car and bicycle parking spaces at surface, undercroft and basement levels. The principal details of the development as proposed under that previous SHD application are provided in **Table 3-1**.

Table 3-1: Residential Units as Proposed under ABP-311181-21

| Apartments | No. of Units |
|----------------------------|--------------|
| Block A (166 units) | |
| 1-bedroom | 49 |
| 2-bedroom | 117 |
| 3-bedroom | 0 |
| Block B (191 units) | |
| 1-bedroom | 57 |
| 2-bedroom | 134 |
| 3-bedroom | 0 |
| Block C (80 units) | |
| 1-bedroom | 45 |
| 2-bedroom | 31 |
| 3-bedroom | 4 |
| Block D (26 units) | |
| 1-bedroom | 20 |
| 2-bedroom | 6 |
| Duplex Apartments | |
| 1-bedroom | 0 |
| 2-bedroom | 26 |
| 3-bedroom | 26 |
| Houses | |
| 2-bedroom | 13 |
| 3-bedroom | 51 |
| 4-bedroom | 12 |
| TOTAL | 591 |

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Other development as proposed in the ABP-311181 SHD application can be summarised as follows:

- Residential amenities, lower ground floor and below podium parking at ground level incorporating car parking, cycle parking, plant rooms and waste management facilities;
- Childcare facility (GFA of c. 627 sq.m) within Block C;
- Café (GFA of c. 195 sq.m) within Block C;
- Retail unit (GFA of c. 249 sq.m.) within Block C; and
- Commercial units (2 no. units of GFA of c. 201 sq.m and c. 63.5 sq.m respectively) within Block B.

The Site Layout as proposed under ABP-311181 is shown in **Figure 3-1** below.



Figure 3-1: Site Layout As Proposed Under ABP-311181

Source: Reddy Architecture and Urbanism

On 9th December 2021, an Order was made by the Board confirming a split decision (ABP-311181-21), to:

- Refuse permission for proposed Block A and Block B
- Grant permission for the remainder of the development as proposed.

3.1.1.2 ABP- 311181-21 DLRCC Assessment

The following provides our summary review of the key issues raised by DLRCC to An Bord Pleanála in respect of Blocks A and B as proposed and refused permission under ABP-311181-21. As the current application to An Bord Pleanála includes new proposals for Blocks A and B the commentary of the Planning Authority in respect of the previously proposed Blocks A and B are important to consider.

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The Chief Executive's Report of DLRCC considered that many elements of the proposed development were acceptable, including:

- Principle of development;
- Density; and
- Residential Accommodation and Mix: (Generally in accordance with provisions of the DLR CDP and would accord with SPPRs of Apartment Guidelines).

However, the Chief Executive's Report of DLRCC ultimately concluded that it is recommended that permission be refused.

The height and massing of proposed Block A in conjunction with Block B within the overall development site at this visually prominent location within the existing coastal environment was a matter of concern.

Block A: by virtue of its monolithic form and massing relative to the receiving environment, would be visually dominant at this location and when viewed in conjunction with Block B in the context of this coastal environment, would be over scale and of insufficient design to alleviate the impact of same.

While the apartment blocks A and B as previously proposed included a degree of articulation with respect to height and footprint, Block A would present a continuous façade in excess of 40m, and DLRCC expressed concern in relation to monolithic form and massing of this block. DLRCC noted the uniform layout/pattern of balcony elements and fenestration on the elevation of this block. Concern as expressed in relation to cumulative visual impact with Block B which is of similar design. The Planning Authority suggested that the predominance of render and proposed mix of materials did not successfully break up the overall massing and form of the apartment blocks.

At the scale of district/neighbourhood/street it was considered that the proposed development did not respond to its overall natural and built environment nor make a positive contribution to the neighbourhood and streetscape - height and massing of Block A relative to coastline;

The Planning Authority identified the proposed distance of 16m between opposing balcony elements serving Block A and B and noted that this would not accord with provision of S.8.2.3.3(iv) of the development plan which seeks to provide a minimum of 22m between opposing windows in the case of apartments up to three storeys in height.

3.1.1.3 ABP- 311181-21 WCC Assessment

The following provides our summary review of the key issues raised by WCC to An Bord Pleanála, in respect of Blocks A and B building proposed under ABP-311181-21. As the current application to An Bord Pleanála includes new proposals for Blocks A and B the commentary of the Planning Authority in respect of the previously proposed Blocks A and B are important to consider.

The Chief Executive's Report of Wicklow County Council recommended that permission be granted. The principle of development, the density and unit mix were all considered acceptable.

The location and overall design of apartments was generally acceptable. The report noted that with regard to general design and layout there was no significant objection and it was considered that the apartment blocks should have a brick finish in the interests of visual amenity and durability.

3.1.1.4 ABP-311181-21 ABP Inspector's Assessment

The following provides our summary review of the key issues raised in the ABP Inspector's Report (April 2020), in respect of the development proposed under ABP-311181-21, particularly Blocks A and B. The Inspector considered that the principle of residential and commercial development is acceptable and that the subject site can accommodate higher density, high buildings.

The area of open space as proposed was considered reasonable and proportionate to this application.

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Overall, the street network comprising a hierarchy of link street, local streets, and two homezones, which are all interconnected was deemed acceptable.

The planned landscape planting of trees and shrubs across the development site was considered to suitably mitigate the impact of habitat loss by providing substitute nesting sites suitable for most of the bird species currently using the proposed development site

The proposal was considered to widen the housing mix within the general area and improve the extent to which it meets the various housing needs of the community

The Inspector had concerns regarding some issues of design, which it was considered could be addressed by means of conditions.

The pedestrian connection as proposed from the schools to the DART underpass was identified as no longer comprising a direct route and the Inspector considered the creation of a more direct desire line could be addressed by way of condition.

The positioning of the proposed Block B was deemed to limit the legibility and permeability of the north-south open space/pathway to the east of the site and the pathway along the eastern side of the site, which traversed zoned open space in the DLR area. It was considered that it should be increased in width from 2m to 3m and it should be designed as a combined footpath/cycleway.

The Inspector considered the proposed car parking area at the MUGA would negatively impact on the public realm and its location peripheral to the commercial units/shops combined with the boundary treatment would result in a poorly supervised space. It was recommended that this be addressed by means of a condition.

The Inspector considered the proposed development, aside from Blocks A and B, would not impact on the character or setting of historic structures; would add visual interest; would make a positive contribution to the skyline of the area and would improve legibility with the height, scale and massing acceptable in townscape and visual terms.

The Inspector had more particular concerns regarding:

- The permeability of the north-south open space/pathway to the east of the site being compromised by the positioning of Block B;
- Block A and B contravening the Building Height Strategy and related Policy UD6; and
- The visual impact of Blocks A and B.

These concerns are as stated in the Inspectors report are outlined more fully below:

*"I consider in general terms that **it has the capacity to absorb a development of higher density and high buildings** and can determine its own character, without detriment to the amenities of the area, subject to further detailed assessment as set out hereunder in this report..."*

*I consider **the positioning of Block B limits the legibility and permeability of the north-south open space/pathway to the east of the site**, which is an important greenway route incorporated within open space, and I consider the existing greenway route to the River Dargle should be further improved/adequately supported in the design of the larger 'Coastal Gardens' open space to the southeast of the site...*

*I consider apartment **Block B should be repositioned westwards by at least 3m and the pathway through the open space should be increased in width from 2m to 3m along its entire length** up to the connection points into the Corke Abbey Valley Park to the north and onto the street at the DART underpass to the south to deliver and support the attractiveness of this route as a shared pedestrian/cycle path with links to existing/planned paths which are 3m in width, which is supported by the Bray MD LAP Objective R05, GI5 and SLO3....*

*I consider that **the development materially contravenes the Building Height Strategy and related Policy UD6 with regard to Blocks A and B...***

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I consider **Blocks A and B would detract from the visual amenity of the area**, and while I acknowledge that views can be fleeting as set out in Chapter 5 of the EIAR, it is of importance that the design quality of Blocks A and B is such that the blocks can sit comfortably at this location and are of a quality appropriate to this site. In my mind issues arise with these blocks as a result of **the width of the blocks and their orientation toward the coast/railway line, lack of significant variation/modulation in height between/within the blocks, lack of variety or visual relief in terms of elevational treatment, and proposed use of render throughout as a finish** (with the exception of the ground floors), which overall in my view results in a monolithic profile from the east coast. The use of protruding balconies with railings on all elevations to the sea up to a height of seven floors raises concerns in relation to residential amenity and usability of the balconies as well as durability and lack of variety in the elevational treatment.”

3.1.1.5 ABP- 311181-21 ABP Order

On 10 December 2020, an Order was made by the Board confirming a split decision (ABP-311181-21), to:

- Refuse permission for proposed Block A and Block B; and
- Grant permission for the remainder of the development as proposed.

The Board refused to grant permission for Blocks A and B for the following reason:

“1 Having regard to the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018, it is considered that the proposed Blocks A and B by reason of poor design in terms of facade treatment and architectural expression, in combination with their disposition on the site, would not constitute an adequate design response to the context and the opportunity presented on this coastal urban site, and would not, therefore, be in accordance with the criteria set out under section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018 and would not be in accordance with the proper planning and sustainable development of the area.”

3.1.1.6 Nature and Extent of Consented Development

The development permitted under ABP-311181-21 comprises all of the development as initially proposed excluding Blocks A and B. The permitted development therefore comprises all of the site development and overall site layout and landscaping works, Blocks C and D, the duplex types and the houses as amended by condition.

The permitted residential development is detailed in **Table 3-2**.

Table 3-2: Permitted Residential Units

| Apartments | No. of Units |
|---------------------------|---------------------|
| Block C (80 units) | |
| 1-bedroom | 45 |
| 2-bedroom | 31 |
| 3-bedroom | 4 |
| Block D (26 units) | |
| 1-bedroom | 20 |
| 2-bedroom | 6 |
| Duplex Apartments | |
| 1-bedroom | 0 |
| 2-bedroom | 26 |
| 3-bedroom | 26 |
| Houses | |
| 2-bedroom | 13 |
| 3-bedroom | 51 |
| 4-bedroom | 12 |
| TOTAL | 234 |

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Other ancillary residential uses and non-residential uses permitted comprise:

- Residential amenities, lower ground floor and below podium parking at ground level incorporating car parking, cycle parking, plant rooms and waste management facilities;
- Childcare facility (GFA of c. 627 sq.m) within Block C;
- Café (GFA of c. 195 sq.m) within Block C;
- Retail unit (GFA of c. 249 sq.m.) within Block C; and

Planning permission is now being re-sought for the development of the entire site. Those elements of the development permitted under ABP Ref. 311181-21, as detailed above have not been altered in this current application in any meaningful or substantive way beyond the modifications required by condition. In this regard, it is noted that DL RCC, WCC and the Board were largely supportive of the principles of the proposal and considered the quantum of development and general urban design to be appropriate. It is expected that the same considerations will continue to be applied to those same aspects of the development in the current application.

The proposed Blocks A and B are considerably changed from those proposed under ABP Ref. 311181-21, in order to address fully the concerns as articulated in the decision of the Board. The revised design approach adopted in this current application and the rationale for same, given its particular site context, is set out in the enclosed *Architectural Design Statement* by GHA. The *Architectural Design Statement* considers Blocks A and B as an integral element of the overall site development and also addresses the suitability of the overall design response given its coastal location.

3.1.2 Previous Planning Permissions at Subject Site

Separate but concurrent planning applications for a significant residential development were made by Pizarro Developments to Bray Town Council and WCC. These applications were granted planning permission following appeals to the Board. The details of each are set out below.

3.1.2.1 ABP Ref. PL39.230246 (WCC/Bray Town Council Reg. Ref. 07/630194)

Planning permission was granted on 3rd June 2010 for a mixed use development which comprised *inter alia* the demolition of Nos.1-4 Ravenswell Road, a building at the entrance of the St. John of Gods / St. Philomena's school complex, an outbuilding in the St. John of Gods lands, the golf course clubhouse and ancillary buildings and the construction of 603 no. residential units, 57,967 sq.m of gross retail floor area (excluding storage), 5,797 sq.m of office, 8 screen cinema with floor area of 5,237 sq.m, a 103 no. bedroom hotel, 6 no. bars, 11 no. restaurants, 2 no. crèche, 1 no. doctor's surgery, 1 no. community building, 1 no. dentist surgery, GAA pitch; community elements; ancillary parking and other infrastructure by the Board under case **Ref. PL39.230246 (WCC/Bray Town Council Reg. Ref. 07/630194)**.

An extension of duration for this planning permission was granted under **WCC Reg. Ref. 20672**. This consent will now expire in 2025. The layout of this development is presented in **Figure 3-2** below.

PLANNING REPORT & STATEMENT OF CONSISTENCY

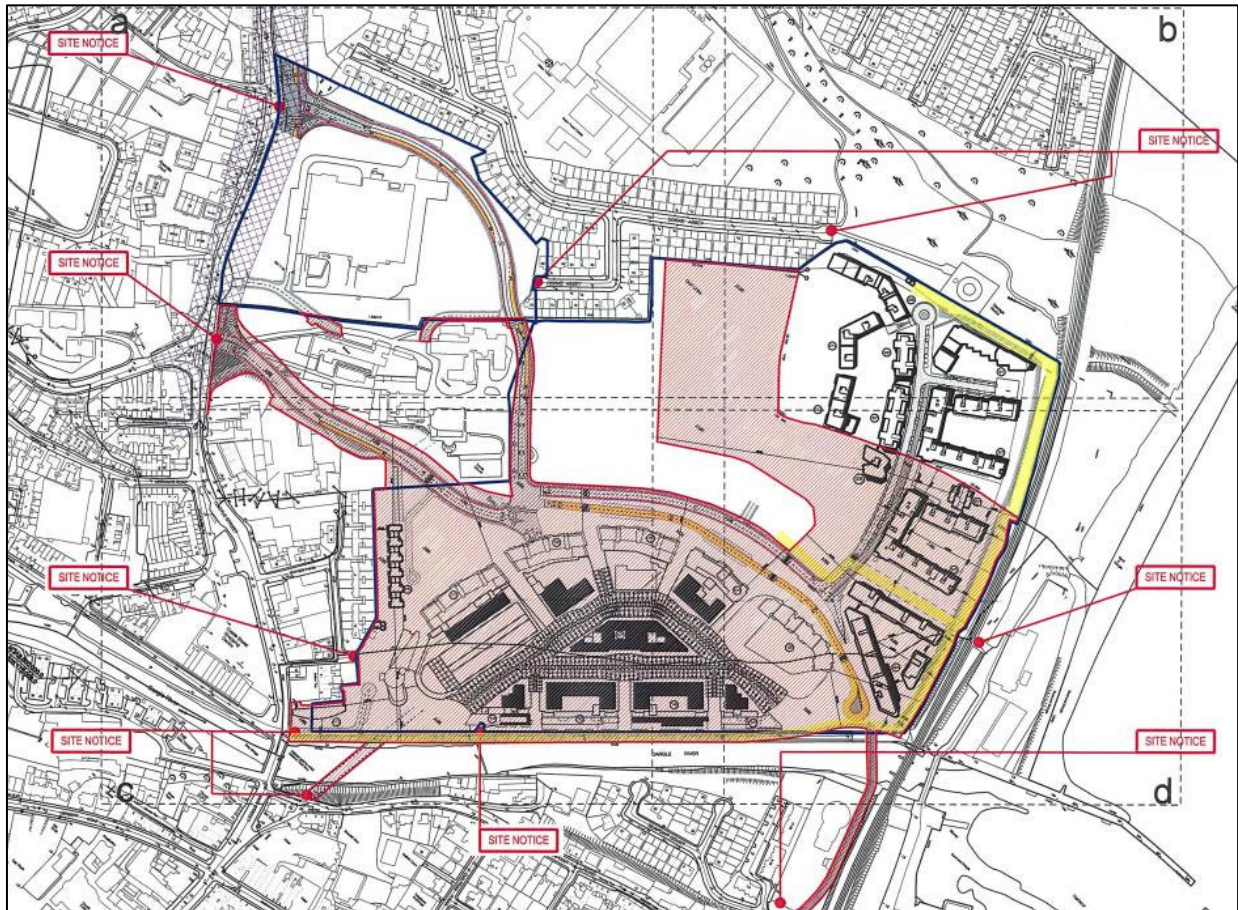


Figure 3-2: An Bord Pleanála Case Ref. PL39.230246 WCC/Bray Town Council Reg. Ref. 07/630194)

Source: Applicant

3.1.2.2 ABP Ref. PL06D.230215 (DLRCC Reg. Ref. D07A/1495)

Planning permission was granted on 3rd June 2010 for a mixed use development to include *inter alia* 348 no. residential units; 1 no. retail unit (80 sq.m); 1 no. cafe; associated parking, roadworks, landscaping, site development and service works (which will link into proposed landscaping, site development and service infrastructure for adjoining lands by the Board under case **Ref. PL06D.230215 (DLRCC Reg. Ref. D07A/1495)**). An extension of duration for this planning permission was refused under **DLRCC Reg. Ref. D07A/1495_E** on the basis that insufficient evidence of substantial works completed. A second extension of duration application for this planning permission was submitted to the planning authority and further information was requested by the council on 25th November 2020 under **DLRCC Reg. Ref. D07A/1495_E1**. Further Information was not submitted. The permission is now expired.

The layout of the development under PL06D.230215 (DLRCC Reg. Ref. D07A/1495) is presented in **Figure 3-3** below.

PLANNING REPORT & STATEMENT OF CONSISTENCY

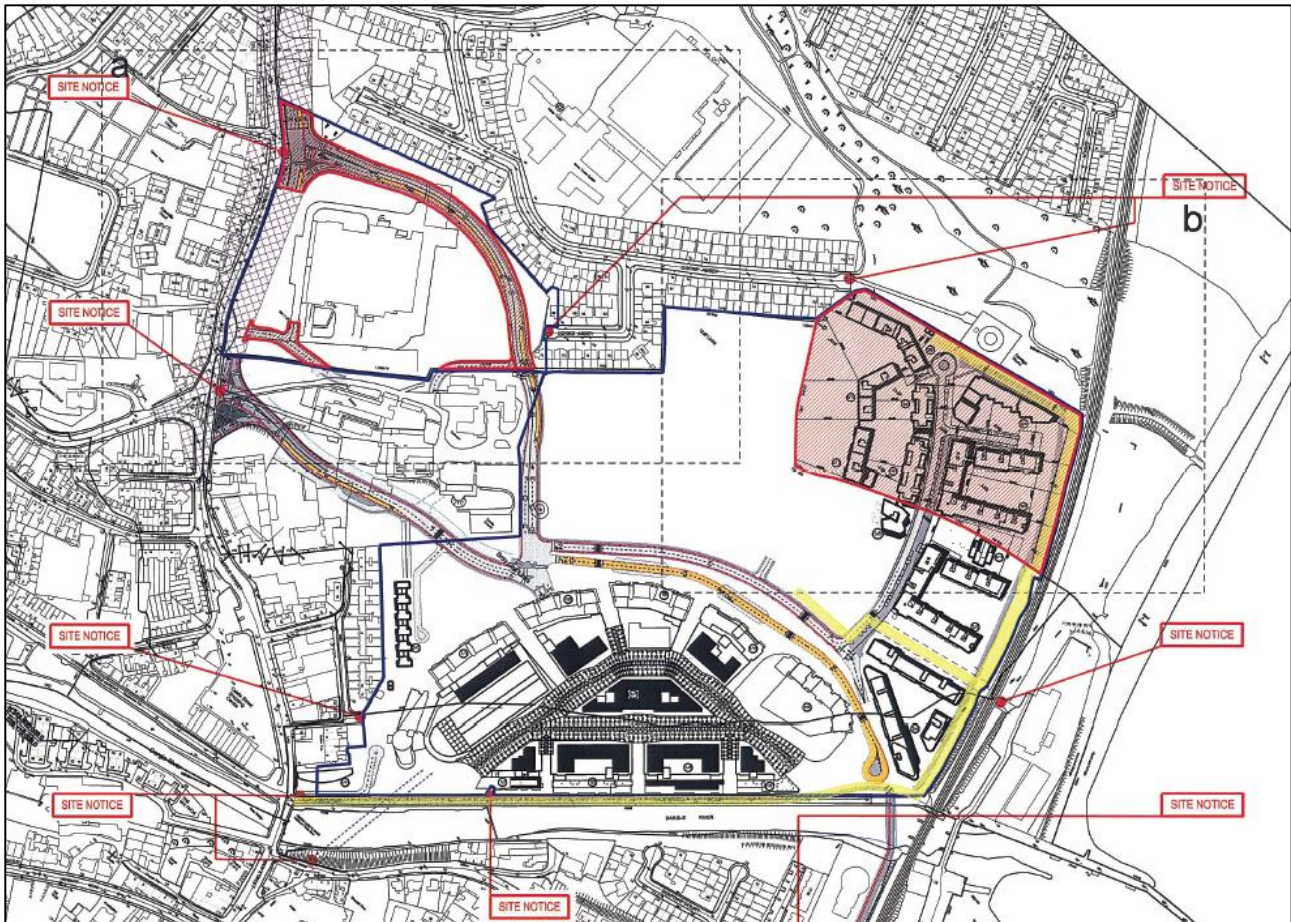


Figure 3-3: An Bord Pleanála Case Ref. PL06D.230215 (DLRCC Reg. Ref. D07A/1495)

Source: Applicant

Having regard to the location of the site across the river from the historic town centre of Bray, the zoning of the site, the provisions of the development plan for the area and the Bray Golf Club Area Action Plan, the nature of the proposed development which would constitute an extension to Bray town centre; the planning history of the site, planned and permitted improvements in access to the site, it was considered by the Board that the proposed development contained in both applications, subject to compliance with conditions, would not seriously injure the amenities of the area, would be acceptable in terms of traffic safety and convenience, would not be prejudicial to public health and would, therefore, be in accordance with the proper planning and sustainable development of the area. It is noted to the Board that development permitted within the subject site has established the acceptance of significant development at this location with buildings of up to 8 storeys in height.

3.1.3 Infrastructural Proposals

3.1.3.1 WCC Ref. 21689

On 21st July 2021 Wicklow County Council gave Notice under section 179 of the Planning and Development Act as amended and Part 8 (Article 81) of the Planning and Development Regulations 2001 as amended of its intention to construct the Bray Sustainable Transport Bridge, link road and associated works in the townlands of Bray, Bray Commons and Ravenswell. The proposed bridge over the River Dargle and link road will consist of a two-lane public transport road 3.25m wide and variable width pedestrian, cyclist and shared path facilities. A new pedestrian boardwalk is proposed along the southern bank wall to link the existing walkway to the bridge crossing. The proposed layout is shown in **Figure 3-4**.

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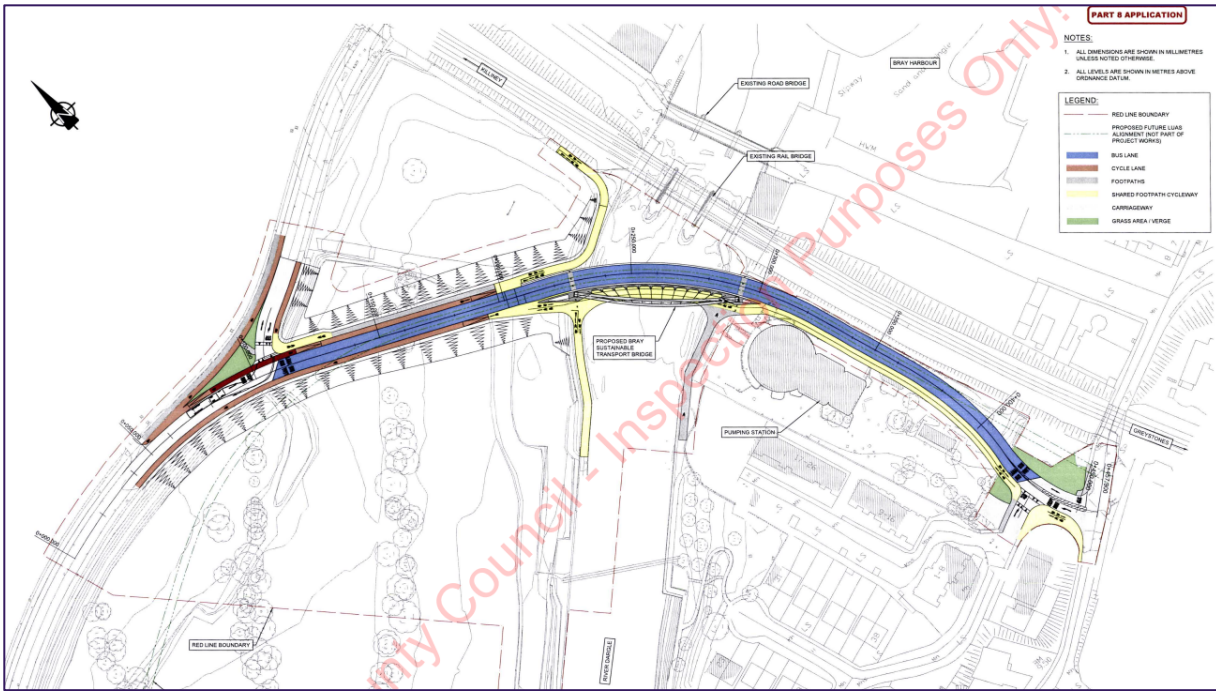


Figure 3-4: Proposed Bray Sustainable Transport Bridge

Source: Layout Plan (Arup)

The SHD development previously consented under ABP Ref. 311181 and the current SHD proposals have been designed to integrate with this planned bridge.

The Part 8 procedures have not yet been completed by Wicklow County Council so the scheme has not yet been consented.

3.2 Adjacent Lands

The surrounding lands have a very extensive planning history and there has been significant development over the last 10 years. The following planning permissions relate to significant recent application on lands proximate to the subject lands.

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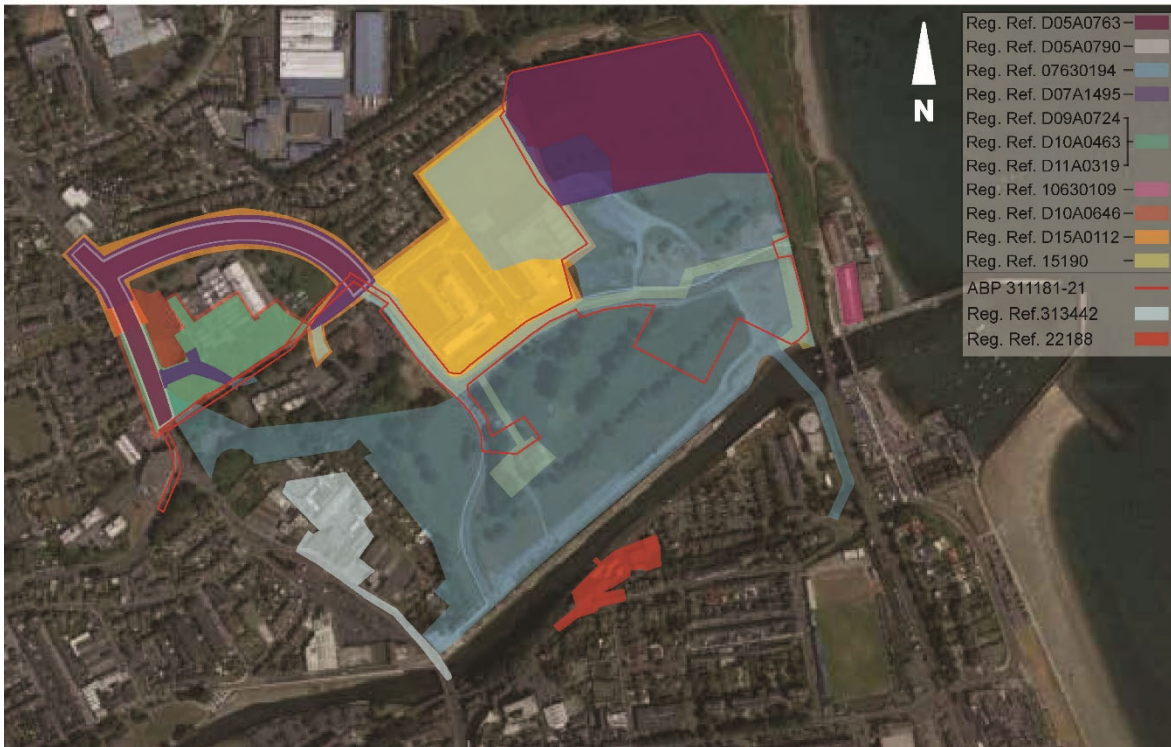


Figure 3-5: Subject site and other planning application locations

Source: Google Maps, RPS Annotation

Schools Complex

- Case Ref. PL 06D.217910 (WCC Reg. Ref. 15190):** Planning permission was granted on 30th July 2015 for a 450 pupil two storey post primary school and a 24 classroom, two storey, part three storey, primary school with a new vehicular access road including dedicated pedestrian and cycling routes and a new pedestrian and cycle route off the Dublin Road with ancillary engineering services and all associated landscaping and site development works. These schools have been constructed and are now operational.
- Case Ref. PL06D.244874 (DLRCC Reg. Ref. D15A/0112):** Planning permission was granted on 26th November 2015 for a new vehicular access road off the Dublin road, including dedicated pedestrian and cycling routes and a new pedestrian and cycle route off the Dublin Road with ancillary engineering services and all associated landscaping and site development works (which will link into the proposed new road to serve the proposed schools site within the former Bray Golf Club Lands), the demolition of an outbuilding at the Industrial Yarns Complex and of part of the extension to no. 70 Corke Abbey and the provision of a new access road to the St John of Gods site off the proposed new internal road (for which a separate concurrent planning application is being made by the Board of Managements of St Philomena's Primary School and Coláiste Raithín Post Primary School on behalf of the Department of Education and Skills to WCC). This access road has been constructed.

Industrial Yarns Site

- WCC Reg. Ref. 10630109:** Planning permission was granted on 16th March 2011 for demolition of existing light industrial/warehousing building (existing floor area c. 1,096 sq.m & c. 6.85m in height) and replacement of same with a new light industrial warehousing building (proposed floor area c. 1,473 sq.m). Planning permission was granted under **WCC Reg. Ref. 16367** on 16th May 2016 for the extension of the appropriate period for development permitted under WCC Reg. Ref. 10630109.

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- **Case Ref. PL06D.235897 (DLRCC Reg. Ref. D09A/0724):** Planning permission was refused on 20th July 2010 for a development comprising part of an overall proposal by the applicant to change the use of part of the existing Industrial Yarns building from retail warehouse use to discount foodstore (to include off-licence) use, and to relocate the existing vehicular access to the Industrial Yarns site with associated upgrade works to the Dublin Road.
- **Case Ref. PL06D. 237908 (DLRCC Reg. Ref. D10A/0463):** Planning permission was granted on 23rd March 2011 for a change the use of part of the existing Industrial Yarns building from retail warehouse use to discount foodstore (to include off-licence) use, and to relocate the existing vehicular access to Industrial Yarns site with associated upgrade works to Dublin Road.
- **Reg. Ref. D10A/0646:** Planning permission was granted on 25th January 2011 for change of use of part of the Industrial Yarns building from retail warehouse use to discount foodstore (to include off-licence) use, and to relocate the existing vehicular access to the industrial Yarns site with associated upgrade works to the Dublin Road.
- **Reg. Ref. D11A/0319:** Planning permission was granted on 23rd August 2011 for modifications to planning permission Case Ref. PL06D.237908 (DLRCC Reg. Ref. D10A/0463). The proposed modifications comprise the following: increase in the net sales area of the permitted discount foodstore by c. 110 sq.m and other more minor modifications.

Key issues influencing the planning authority's consideration of applications have been:

- Retail impact of proposed development and retail capacity within Bray; and
- Transport and traffic impacts including the delivery of the LUAS extension, capacity of the Dublin Road (R761) and the impact on the N11 / M11.

The subject proposals comprise residential development with a limited retail component. A carefully considered transport strategy for the proposed development as set out in the *Mobility Management Plan* has been prepared by Atkins which prioritises walking, cycling and public transport, based on the advantages the site enjoys proximate to bus services along the Dublin Road, Bray Daly railway station and future projects such as the public transport bridge and the planned LUAS Green line extension. The *Traffic and Transport Assessment* prepared by Atkins has examined the impact the proposed development will have on the road network and concluded that even on sensitive junctions the impact of the proposed development shall be marginal.

For clarity, key existing infrastructure, now in place and the planning reference under which it is permitted are shown in **Figure 3-6**.

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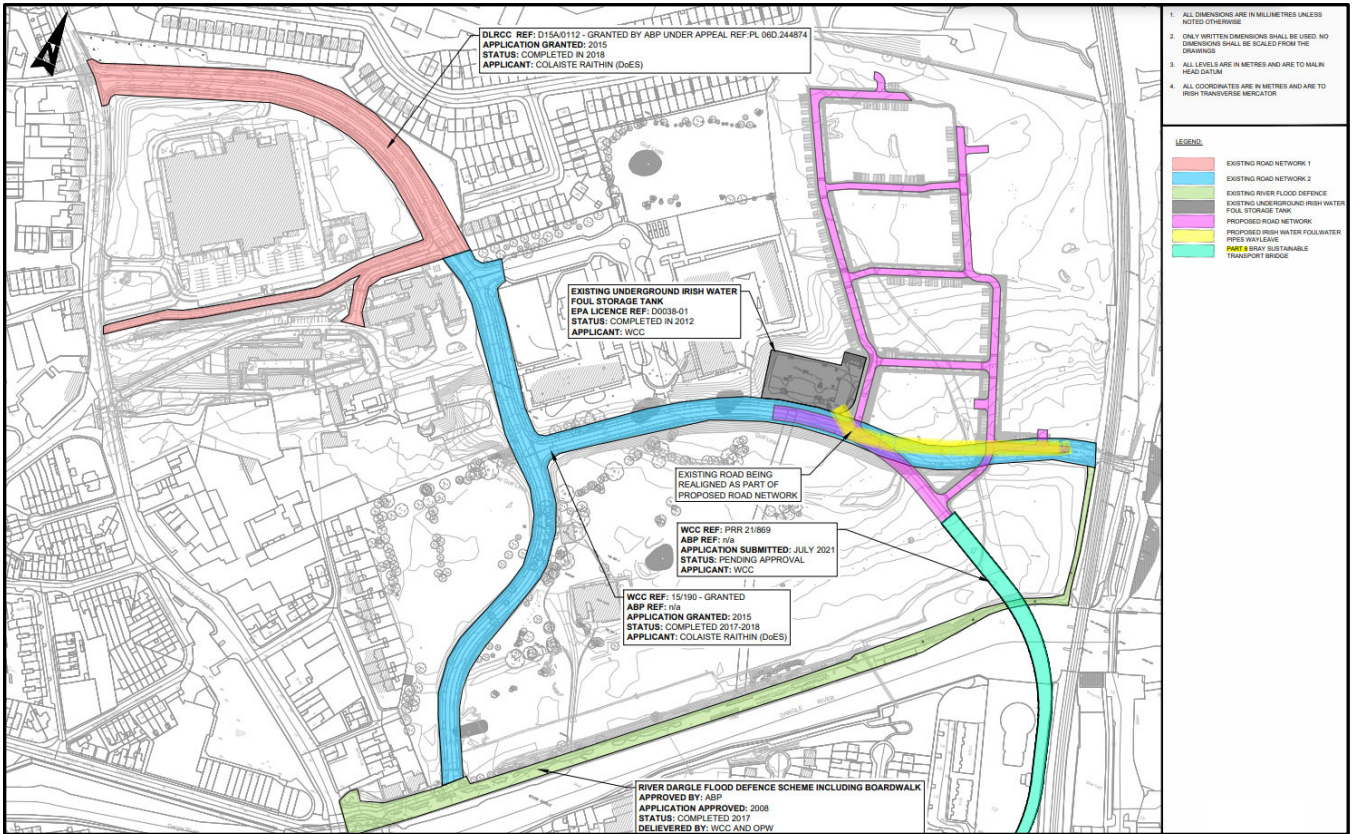


Figure 3-6: Existing Infrastructure and Planning Reference Details

4 DESCRIPTION OF PROPOSED DEVELOPMENT

4.1 Harbour Point Masterplan

The *Harbour Point Masterplan* sets the context for the proposed SHD. The subject lands (outlined in red on Glenn Howells Architects Dwg. No. BRA-GHA-SW-XX-DR-A-05001) are part of a larger landholding (outlined in blue) which have been acquired by the applicant.

The overall Harbour Point development site of approximately 19 hectares comprises the former Bray Golf Club lands. Given the size and strategic location of the site, the applicant appointed Glenn Howells Architects to prepare a masterplan to guide the development of the entire land holding. The *Harbour Point Masterplan* is grounded in national, regional and local planning policy and guidelines as well as best practice in urban design. It provides the overarching development framework for the lands and sets out the design principles that will govern this planning application and all future applications on the overall landholding. The masterplan is included as part of this application.



Figure 4-1: Harbour Point Masterplan

Source: Glenn Howells Architects

The development of the lands is also provided in regional and local statutory planning documents as detailed in **Section 7** of this Report.

Within the Dublin Metropolitan Area there is an urgent demand for an increased provision of housing. Given the scale of the landholding, the urgency of the current housing crisis and the statutory planning context, the applicant has decided to advance the Coastal Quarter as the first phase of the *Harbour Point Masterplan*. A logical division from the southern proposed River Quarter for the purposes of planning permission is the alignment of the new public transport route which also represents the indicative alignment of the proposed Green LUAS Line Extension to Bray.

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The *Harbour Point Masterplan* provides for a 'Landmark Building' within the subject lands. It is envisaged that a mixed use landmark building will be delivered in a subsequent planning application. The planned location of the future landmark building, within the subject site is indicated in the Public Open Space and Residential Amenity Dwg. no. BRA-GHA-SW-ZZ-DR-A-05006 prepared by Glenn Howells Architects.

4.2 Coastal Quarter Proposed Development

The first phase of the *Harbour Point Masterplan* principally consists of the Coastal Quarter.

The site is generally bounded to the north by existing public open space at Corke Abbey Valley Park, to the east by the Dublin-Rosslare main rail line, to the south by the River Dargle and to the west by the existing Ravenswell schools campus. Further phases of the overall site, as indicated in the *Harbour Point Masterplan*, will take place to the south and west and will be delivered through separate future planning consent(s).

The application site benefits from permission for residential-led mixed use strategic housing development under ABP 311181-21 (i.e. the consented SHD development). The current proposed development incorporates the development already permitted under ABP-311181-21 including minor modifications required by a number of conditions of ABP 311181-21 as follows:

- **Condition 4d** – Car parking spaces at the Orchard car park shall be omitted and in its place, an area of open space shall be delivered, with design and boundary details to be agreed, and access maintained for maintenance vehicles servicing the wastewater infrastructure.
- **Condition 4e** - Revised plans and particulars in relation to boundary treatments, including details in relation to the northern boundary and retention of trees and planting at this location in addition to the protection of water conveyance routes at this location. The proposed 2.4 metres high block wall along the eastern boundary to the eastern open space adjoining the railway line shaft be omitted and in its place proposals for a revised boundary treatment of a high quality and permeable finish shaft be submitted to the relevant planning authorities for written agreement. Details in relation to a construction methodology shaft be submitted to ensure the retention of the north-eastern hedgerow and additional planting along the entire boundary.
- **Condition 4f** - The north-south path along the eastern boundary of the site shaft be redesigned as a shared footpath and cycleway, with a minimum width of three metres, and details submitted in relation to the tie-in with the street to the south at the railway underpass and connection to the two pedestrian access points in the northern boundary.
- **Condition 4h** – The area utilised for use as Phase 3 site compound shall not be utilised as a construction compound or utilised for construction equipment, machinery or materials at any stage during the construction works.
- **Condition 5a** – Modified proposals for landscaping to incorporate increased planting of semi-mature trees to thicken up and improve the screening capacity of the tree line on the northern boundary of the development to minimise light spillage from the proposed development and increased planting of shrub species, in particular furze in the 'Coastal Gardens' adjacent to the railway to provide cover for the movement of mammals including badgers through this area and habitat suitable for the stonechat.
- **Condition 11** – The render finish to external elevations of Block C and Block D shall be replaced with an alternative durable, high quality material or finish.

The current proposed development also includes new proposals for Blocks A and B which were previously refused under ABP 311181-21. In redesigning Blocks A and B it has also been necessary to incorporate some localised changes within the scheme in the landscaped areas around Blocks A and B.

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The applicant is applying to the Board for permission for a SHD comprising 586 no. residential units (of which 274 no. units will be located within the administrative area of DLRCC and 312 no. units will be located within the administrative area of WCC), c.1,583 sq.m of other uses comprising of a childcare facility, café, retail unit and 1 no. commercial unit (incorporating a gym and juice bar) (located in the WCC administrative area), all associated and ancillary development and infrastructural works, hard and soft landscaping and boundary treatment works, associated car and bicycle parking spaces at surface, undercroft and basement levels. The Proposed Site Layout is illustrated on Dwg. nos. BRA-GHA-SW-ZZ-DR-A-05002 and BRA-GHA-SW-ZZ-DR-A-05003 (Site Layout Plans Sheets 1 & 2 of 2) prepared by Glenn Howells Architects. Site Layout Plan Sheet 1 (BRA-GHA-SW-ZZ-DR-A-05002) is shown in **Figure 4-2** below.



Figure 4-2: Proposed Site Layout Sheet 1

Source: Glenn Howells Architects

The proposed layout of the development has been informed by the site levels which fall from north to south across of the site. As noted above it comprises a mix of apartment blocks, houses and duplex units.

The apartment blocks are arranged to allow for optimal sunlight penetration and to take advantage of sea views both northward to Dalkey and south to Bray Head.

Block A in the northern part of the site comprises of two discrete blocks (Blocks A1 and A2) enclosing a central podium level open space above a combined single ground floor plate. The ground floor accommodates perimeter external facing apartments, services, lobbies and residential amenity spaces surrounding a central undercroft area with car parking, bike storage and service facilities. From first floor Block A comprises two blocks ranging in height from 4 to 7 storeys (including the ground floor) with apartments and associated balconies facing both inwards to the central landscaped communal courtyard and outwards overlooking the Coastal Gardens which provide green link connections and amenity walks around the development and between the apartment block structure and the railway line embankment. Apartments on a first floor podium level and above are arranged around a landscaped communal garden. Block A is

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proposed as Build to Rent accommodation and accordingly comprises a significant amount of residential amenity and support service area at ground and first floor level. The residential amenities comprise of a residents gym, a co-working space, residents lounges in addition to the communal landscaped podium area. On-site support services to be provided comprise a concierge facility, a secure internal bicycle repair and storage area (with external access) and waste storage and management.

Block B lies south of Block A along the coast and also comprises of two discrete blocks (Blocks B1 and B2) enclosing a central communal landscaped courtyard at podium level. This podium level is above two ground levels, a lower ground level and an upper ground level, both of which comprise part basement elements to address the fall in levels across the site. The lower ground level accommodates communal residential amenity areas for future residents, a commercial gym and juice bar at the ground floor parts with various building services, waste and bike stores along with car parking at basement level. The commercial gym unit extends to the upper ground floor level where outward facing apartments are also provided in the above ground parts of this floor. Car parking, bicycle parking and building services are provided with the basement part of this upper ground floor. Above podium, Block B comprises two blocks which will range from 5 to 12 storeys in height (including the ground floors). This block again contains apartments both internal and external facing with associated balconies. Some apartments are dual aspect and some will have internal views to the courtyard and others will facing outwards overlooking the Coastal Gardens.

The gaps between Blocks A1 and A2 and B1 and B2 are approximately equal to the gap between Blocks A and B. Thus a rhythm of four blocks is established, with the final block (B2) given an accent of additional height. On their eastern sea facing elevations, Blocks A and B have been designed to present as a contiguous development line along the coastal boundary. Block A will present as a 6 and 7-storey block and Block B ranging from 6 to 12-storeys facing onto the coastal area. This is illustrated in **Figure 4-3**.



Figure 4-3: Proposed Eastern Contiguous Elevation

Source: Glenn Howells Architects

Block C is located to the west of Block B and seeks to create a strong edge onto the future public transport route as per the Green LUAS Line Extension Indicative Alignment, the proposed Market Square and pedestrian link to the underpass providing access to Bray Harbour. This 3 to 6-storey block will contain parking and ancillary building services, a childcare facility with outdoor play area, café and convenience retail unit at ground floor level. Apartments will be provided on levels above the ground floor and all will share a communal garden at the centre of the block. The positioning of the uses will provide all day activity onto the public plaza provided at Market Square. Block C will form the northern edge to the Market Square and will be located opposite future development within the River Quarter. Development on the south eastern side of the square will form part of separate application which is intended to accommodate a mix of non-residential uses within an architectural set piece. The location of this landmark building is indicated on Public Open Space and Residential Amenity Dwg. no. BRA-GHA-SW-ZZ-DR-A-05006 prepared by Glenn Howells Architects.

Block D is located within the north west portion of site within a sylvan setting. This 4-storey block will provide a strong edge and passive surveillance onto the woodland park within which it is set. Car and bicycle parking spaces, ancillary plant and waste storage are provided at undercroft level.

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The remainder of the site accommodates 76 no. housing units and 26 no. duplex apartments (providing 52 no. residential units) arranged along a grid street layout. In all instances, these 2 to 3 storey units will benefit from private open spaces to the rear which meet or exceed the relevant minimum standards. This is confirmed in the *Housing Quality Assessment* prepared by Glenn Howells Architect. Appropriate separation distances to existing neighbouring dwellings are also provided to protect residential amenity. These units seek to provide a mix of 2, 3 and 4-bedroomed units and will add to the variety of dwelling types provided by the proposed scheme and will provide appropriate transitions in terms of scale and typology to the surrounding residential area.

The principal details of the proposed development are provided in **Table 4-1**. The table identifies the development proposed as previously permitted in grey with the additional new proposed development in yellow. Total figures for the entire proposed development as now provided for in this application are identified in yellow

Table 4-1: Proposed Development

| Development Element | No. of Residential Units | Floor Area of Ancillary Residential Amenity Space | Floor Area of Non-Residential Elements |
|---|--------------------------|---|--|
| Block A Build to Rent Residential Block (162 units) | | | |
| 1-bedroom apartments | 79 | | |
| 2-bedroom apartments | 76 | | |
| 3-bedroom apartments | 7 | | |
| Residential Amenity Uses | | 545sq.m | |
| Block B Residential Block with commercial / retail space (190 units) | | | |
| 1-bedroom apartments | 94 | | |
| 2-bedroom apartments | 86 | | |
| 3-bedroom apartments | 10 | | |
| 1 No. commercial unit (gym and juice bar) | | | 512sq.m. |
| Residential Amenity Uses | | 539sq.m | |
| Block C Residential Block with mixed uses (80 units) | | | |
| 1-bedroom apartments | 45 | | |
| 2-bedroom apartments | 31 | | |
| 3-bedroom apartments | 4 | | |
| Café | | | 195sq.m. |
| Retail Unit | | | 249sq.m. |
| Childcare Facility | | | 627sq.m. |
| Block D Residential Block (26 units) | | | |
| 1-bedroom apartments | 20 | | |
| 2-bedroom apartments | 6 | | |
| Duplex Apartments | | | |
| 1-bedroom duplex apartment unit | 0 | | |
| 2-bedroom duplex apartment unit | 26 | | |
| 3-bedroom duplex apartment unit | 26 | | |
| Houses | | | |
| 2-bedroom houses | 13 | | |
| 3-bedroom houses | 51 | | |
| 4-bedroom houses | 12 | | |
| TOTAL | 586 | | 1,583sq.m |

Source: Glenn Howells Architects

Note: Development identified in grey is proposed as previously permitted under ABP 311181; development in green is additional proposed development.

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4.3 Residential Unit Type and Mix

The residential mix provided consists of:

- 52 no. duplex units consisting of 26 no. 2-bedroom, own door ground floor apartments with 26 no. 3-bedroom, own door duplex apartments over providing 52 no. units with balconies and gardens.
- 76 no. house units comprising:
 - 13 no. 2-bedroom, 2-storey terraced houses;
 - 51 no. 3-bedroom, 2-storey terraced houses; and
 - 12 no. 4-bedroom, 3-storey terraced houses;
- 4 no. apartment blocks which comprise of:
 - Block A is proposed as Build to Rent development ranging in height from 4 to 7-storeys with a landscaped communal open space on a central podium and containing 162 no. units consisting of: 79 no. 1-bedroom apartments, 76 no. 2-bedroom apartments and 7 No. 3-bedroom apartments all with balconies or terraces; c.545 sq.m. of residential amenity and services spaces accommodating a residents gym, a co-working space, resident lounges, concierge area and bicycle repair area; car and bicycle parking spaces, including bicycle repair areas; ancillary plant; waste storage and substations/switch rooms at undercroft level.
 - Block B ranges in height from 5 to 12-storeys and containing 190 no. units consisting of: 94 no. 1-bedroom apartments, 86 no 2-bedroom apartments and 10 no. 3-bed apartments, all with balconies or terraces; c. 539 sq.m. residential amenity spaces; external communal open space on a central podium; car and bicycle parking spaces; 1 no. commercial unit (incorporating gym / juice bar) c. 114 sq.m; ancillary plant; waste storage and substations/switch rooms at undercroft and lower ground levels.
 - Block C ranges in height from 3 to 6-storeys and containing 80 no. units: 45 no. 1-bedroom apartments, 31 no. 2-bedroom apartments and 4 no. 2-bedroom duplex units, all with balconies or terraces; c.195 sq.m café, c.249 sq.m retail unit and c.627 sq.m childcare facility at ground level with ancillary outdoor space, with associated external space; residential amenity space; external communal open space on a central podium; car and bicycle parking spaces; ancillary plant; waste storage and substation/switch rooms at undercroft level.
 - Block D is a 4-storey building and contains 26 no. units: 20 no. 1-bedroom apartments and 6 no. 2-bedroom apartments with balconies; car and bicycle parking spaces, ancillary plant, waste storage and substation/switch rooms at undercroft level.

Table 4-2 provides a summary of the proposed unit type and the number of bedrooms per unit.

Table 4-2: Unit Mix Size and Type Summary

| Proposed Overall Residential Unit Mix | | |
|--|------------------------|-------------------------------|
| Apartment Type | No. of Units | % of Development Units |
| 1-bedroom | 238 units | 41% |
| 2-bedroom | 199 units | 34% |
| 3-bedroom | 21 units | 4% |
| Sub-Total | 458 Apt Units | 79% |
| Duplex Type | | |
| 2-bedroom | 26 | 4% |
| 3-bedroom | 26 | 4% |
| Sub-Total | 52 Duplex Units | 8% |

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| Proposed Overall Residential Unit Mix | | |
|---------------------------------------|-----------------------|-------------|
| House Type | | |
| 2-bedroom | 13 | 2% |
| 3-bedroom | 51 | 9% |
| 4-bedroom | 12 | 2% |
| Sub-Total | 76 House Units | 13% |
| Total | 586 Units | 100% |

Source: Glenn Howells Architects

Table 4-3 presents a summary of the dwelling sizes proposed by Planning Authority area.

Table 4-3: Proposed Overall Unit Size Mix by Planning Authority area

| Proposed Overall Residential Unit Mix | | | | | | |
|---------------------------------------|------------------|----------------|------------------|----------------|-----------------------|---------------------------------|
| Type | No. Units DLR | % Units DLR | No. Units WCC | % Units WCC | Total No. of Units | Total % of Development Units |
| 1-bedroom | 99 | 36% | 139 | 45% | 238 units | 40.5% |
| 2-bedroom | 110 | 40% | 128 | 41% | 238 units | 40.5% |
| 3-bedroom | 54 | 20% | 44 | 14% | 98 units | 17% |
| 4-bedroom | 11 | 4% | 1 | - | 12 units | 2% |
| Total | 274 Units | | 312 Units | | 586 Units | 100% |

Source: Glenn Howells Architects

Table 4-4 presents the total numbers of proposed apartments within the scheme by size, including duplex types.

Table 4-5 presents the numbers of proposed apartments, including duplex types (excluding Build to Rent (BTR) Proposals) by local authority area and the total combined.

The proposed development's compliance with relevant unit mix policies is detailed in Section 7 of this Report and also discussed in the enclosed *Housing and Tenure Types and Mix Report* by RPS.

Table 4-4: Apartment Size Mix (including Duplex)

| Apartment Size Mix | | |
|---------------------|-----------------|------------------|
| Apartment Unit Size | Number of Units | Percent of Total |
| 1-bedroom | 238 | 46.9% |
| 2-bedroom | 225 | 44.1% |
| 3-bedroom | 47 | 9.2% |
| Total | 510 | 100% |

Source: Glenn Howells Architects

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Table 4-5: Apartment Size Mix by Local Authority Area (including duplex and excluding BTR)

| Apartment Unit Size | Apartment Development within DLR County Area | | Apartment Development within Wicklow County Area | | Overall Proposed Apartment Development | |
|---------------------|--|-----------------------|--|-----------------------|--|------------|
| | No. of Units | % of Units within DLR | No. of Units | % of Units within WCC | No. of Units | % of Units |
| 1 Bed | 20 No. | 33% | 139 No | 49% | 159 No. | 46% |
| 2 Bed | 23 No. | 38% | 126 No. | 43% | 149 No. | 43% |
| 3 Bed | 17 No. | 28% | 23 No. | 8% | 40 No | 11% |
| Total | 60 No. | | 288 No. | | 348 No. | |

The proposed unit type and mix is similar with that which was proposed under ABP Ref. 311181-21 and in this regard the ABP Inspector's Report is pertinent:

“The proposal in my opinion serves to widen the housing mix within the general area and would improve the extent to which it meets the various housing needs of the community, which has traditionally been served by standard two storey housing and is in line with the overarching national aims to increase housing stock, including in the apartment sector, as set out in various policy documents, including, but not limited to, Rebuilding Ireland – Action Plan for Housing and Homelessness (2016) and Housing for All – A New Housing Plan for Ireland (2021).”

The further proposal for one of the apartment buildings to comprise specifically of Build to Rent development further enhances the overall tenure mix at the site compared with that previously proposed.

The proposed development's compliance with relevant unit mix policies is detailed in **Section 7** of this Report.

4.4 Build to Rent

Build to Rent (BTR) is a new form of housing development in government policy and specifically within the 'Sustainable Urban Housing: Design Standards for New Apartments', which seeks to deliver a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to our current housing mix. BTR can be defined as 'purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.'

The BTR model consists of rental properties as opposed to privately owned homes, which is a new and exciting way to meet the housing needs of key sectors of our society including a young and increasingly internationally mobile workforce, as well as older persons who want to live independently.

BTR developments consist of purpose built rental residential units which are centrally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable development of apartment stock. BTR units avail of residential support facilities, services and amenities.

BTR developments must remain as a managed accommodation for 15 years, and no individual units can be sold or rented separately for this period of time. BTR as a housing typology offers the opportunity to hasten the delivery of new quality housing at a time of an acute housing crisis.

To meet current housing demands and contribute to consolidated sustainable growth, BTR schemes offer a maintained and high standard accommodation with relative security of a management company.

BTR developments can provide a viable long term housing solution to households where home-ownership may not be a priority, such people starting out on their careers and who frequently move between countries in the pursuance of career and skills development in the modern knowledge-based economy.

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The suitability of the subject site for Build to Rent is considered in more detail in the *Housing and Tenure Types and Mix Report* submitted with the application. The key findings are as follows:

- The *Design Standards for New Apartments* include only brief commentary on the type of locations that are suitable for Build to Rent apartment. This commentary is made in the context of car parking provision in part (iii) of SPPR8 which notes that *“there shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services”*.
- The site is both centrally located to Bray town Centre (10 minute walk or 3 minute cycle) and proximate to existing and planned public transport services (10 minute walk or 3 minute cycle to DART station) with easy walking and cycling connections.
- Proximity to the town centre means the development would be a suitable location for many workers employed within the town. The proximity to the public transport connections means the development will offer a sustainable living location for persons commuting to Dublin City Centre and other parts of the wider Greater Dublin Area.
- A review of the existing housing stock within the local catchment of the subject site reveals that there are very few existing apartment buildings within the immediate catchment of the subject site and no large scale multi floored apartment buildings. While there is large scale apartment development permitted at Woodbrook to the north of the application site, none of these are Build to Rent. On the basis of the existing and permitted stock it is reasonable to assume that the rental market within the immediate vicinity is operated largely by independent private landlords with small property portfolios. The delivery of specific Build to Rent accommodation will widen and enhance the range of options available to renters.

4.5 Density

The subject site is located within walking distance of the town centre, public transport services operating along the Dublin Road/Castle Street and also the DART Station at Daly Station Road. It is considered that a significant proportion of high density development should be provided at this site in accordance with prevailing planning policies and guidance, which are set out in **Section 7**. The residential element of the proposed development will cater for a variety of lifestyle requirements by incorporating a good mix of units and types and settings in a central location.

The application site boundary extends to 8.81 hectares. Part of the site is devoted to the land use zoning objective ‘F’, thereby reducing the level of developable area. In addition, part of the application site boundary includes area for servicing connections outside the immediate area of the Coastal Quarter development. Excluding these areas results in a net developable site area of 7.28 hectares (of which 3.09ha lies within DLRC and 4.19ha lies within WCC). The proposed development comprises of 586 no. residential units, resulting in a net density of 80 uph.

4.6 Open Space and Recreation

Changes in lifestyle and working arrangements have resulted in recreational and amenity uses becoming an important town centre function. Such uses include active and passive open spaces, central plaza, market squares and amenity pedestrian walks and cycle routes. The proposed development has been designed with consideration for the existing character and landscape setting of Harbour Point. The landscape design approach reflects the site’s prominent location on the Bray waterfront and banks of the River Dargle while maintaining the open character of the previous land uses. It preserves, where possible, existing, healthy, mature trees, hedgerows and other landscape features. The proposed scheme has been designed to provide additional trees and other planting, as well as play facilities and street furniture.

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The open space and landscape strategy for the proposed development seeks to seamlessly integrate the new development into the existing landscape character of the area to create attractive, usable and linked open spaces. The public areas are designed as landscape spaces and green links that offer the opportunity for meeting, walking, formal and informal play.

In this regard key elements of the proposed landscape scheme are:

- Provision of footpath and cycle links from the proposed development to the existing wider existing footpath/cycleway/ public transport networks to Bray town centre, Bray Daly railway station, the waterfront, Corke Abbey Valley Park, the River Dargle Greenway and the East Coast Cycle Trail.
- Creation of usable areas of public open space distributed throughout the development to allow ease of access and facilitate a wide range of uses for formal and informal activity.
- Retention of boundary vegetation and reinstatement/replacement of native planting to maintain wildlife corridors throughout the proposed development.
- Creation of formal pathway links to the adjacent Corke Abbey Valley Park in agreement with DLRCC Parks Department to extend a ribbon of open space to connect with Bray Harbour and Promenade.

Character areas set out in the landscape masterplan have been further developed to give legibility to different parts of the scheme while also enhancing the public amenities. These character areas are described in the *Landscape Design Strategy* and associated drawings, as shown in **Figure 4-3** below prepared by Park Hood Landscape Architects that accompany the application.

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Figure 4-3: Proposed Character Areas

Source: Landscape Design Strategy prepared by Park Hood Landscape Architects

4.6.1 Public Open Space

A series of public open space with varying uses for residents and visitors are proposed, each with a particular character to reflect its setting and use. The overall development provides c. 13,465 sq.m of high quality, landscaped public open space comprising of the areas set out in **Table 4-6** (see also **Figure 4-4**). These public spaces include play areas and seating. Further detail on public open space proposals is provided in the *Architectural Design Statement* prepared by Glenn Howells Architects and the *Landscape Design Strategy* prepared by Park Hood Landscape Architects.

It is noted that the *Harbour Point Masterplan* provides for a 'Landmark Building' within Character Area 3. It is envisaged that a mixed use landmark building will be delivered in a subsequent planning application. The planned location of the future landmark building, within the subject site is indicated on **Figure 4-4**. It is proposed to landscape this area (c. 2,782 sq.m) on a temporary basis until the mixed use landmark building is delivered. This area is not included in the c. 13,465 sq.m open space calculation.

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It is also highlighted that the c. 13,465 sq.m excludes land subject to the 'F' land use zoning objective which consists of c. 5,630 sq.m of amenity space.

4.6.2 Communal Open Space

Communal open spaces associated with the proposed apartment blocks are provided in accordance with the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020* (see **Section 7.2** of this Report). The proposed communal open spaces are set out in **Table 4-4** and shown in **Figure 4-4**.

These communal courtyards have been designed as semi-private open spaces for use by residents and are defined by adjoining apartment blocks which create a sense of enclosure and provide passive surveillance over these landscaped areas.

Communal courtyards will provide a range of amenity spaces for use by the residents. Secluded seating areas are provided for individuals or small groupings while other spaces to cater for larger groups for communal uses are also integrated into the proposed landscape design. Planting has been designed to create buffers and visual screens between the circulation paths, seating areas and private terraces.

Play areas for young children are proposed within each courtyard where they are passively surveyed by the surrounding apartments. Further details on these areas and all play areas throughout the scheme are provided in the *Landscape Design Strategy* prepared by Park Hood Landscape Architects.

In addition to the above, there are a number of smaller, incidental open spaces that provide visual amenity and biodiversity. These areas are not included in the area calculations for open space provision.

A daylight and sunlight analysis of the proposed development has been undertaken as part of the design process. Results indicate that those communal and public open spaces assessed significantly exceed BRE Guidelines which require that for a garden or amenity to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on March 21st. The *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau is included as part of this application.

A wind modelling exercise was also undertaken to inform the design process and ensure all areas of open space are comfortable within which to take leisure. The *Wind Microclimate Modelling Report* prepared by BFluid Ltd is included as part of this application.

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Figure 4-4: Proposed Public Open Space and Communal Amenity Space

Source: Drawing no. BRA-GHA-SW-ZZ-DR-A-05006 Glenn Howells Architects

Table 4-6: Proposed Public Open Space & Communal Open Space

| Public Open Space (sq.m) | | |
|--------------------------------|-------|---------------|
| Location | Area | Total |
| A: | 5,008 | |
| B: | 540 | |
| C: | 1,958 | |
| D*: | 3,768 | |
| E: | 1,820 | |
| G: | 371 | |
| Total Public Open Space | | 13,465 |

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| Communal Amenity Space (sq.m) | |
|--|---------------|
| Block A | 2,287 |
| Block B | 2,059 |
| Block C | 608 |
| Block D | 153 |
| Area H: Communal Amenity (Controlled Access) | 3,083 |
| Total Communal Open Spaces | 8,190 |
| TOTAL OPEN SPACE | 21,653 |
| Excludes: | |
| Open Space (F zoning) | 5,630 |
| Temporary Landscaped Area within Area G* | 2,782 |

*The *Harbour Point Masterplan* provides for a 'Landmark Building' within Area D. It is envisaged that a mixed use landmark building will be delivered in a subsequent planning application. The planned location of the future landmark building, within the subject site is indicated on **Figure 4-4**. It is proposed to landscape this area (c. 2,782 sq.m) on a temporary basis until the mixed use landmark building is delivered. This area is not included in the c. 13,463 sq.m public open space calculation

Source: Glenn Howells Architects

4.6.3 Play Areas

The proposed development will provide play areas for children of all ages. In accordance with the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020* (see **Section 7.2** of this Report), play facilities are provided for younger children in close proximity to proposed buildings to facilitate adult supervision. Play elements for older children are also provided throughout the scheme. In addition, Area H provides Multi Use Games Area (MUGA) to facilitate sports and recreation for the development and the wider area. **Figure 4-5** shows the locations, extent and type of play provided across the Coastal Quarter. The total area of these play areas is c. 3,038 sq.m.

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Figure 4-5: Location, Extent and Type of Play Areas

Source: Landscape Design Strategy prepared by Park Hood Landscape Architects

4.6.4 Private Open Space

All proposed apartment units, including duplex types, are provided with balconies, terraces or gardens that exceed the minimum standards set out in the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020). These private open spaces are located to overlook proposed public open spaces, and capture sea and landscape views where possible, while ensuring appropriate separation distances to opposing windows or other balconies. The proposed balconies achieve minimum required depths to allow future residents to furnish and enjoy these spaces.

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4.6.5 Links to Other Parks and Recreational Areas

The subject site has the benefit of being located in an area that contains several public parks and amenities including *inter alia* Bray Harbour, Corke Abbey Valley Park, the River Dargle Walkway and the East Coast Trail.

Pedestrian/cycle routes are proposed to link into those routes already created or proposed including the East Coast Trail and Corke Abbey Valley Park and the planned public transport bridge over the River Dargle.

The cumulative impact of the proposed routes integrating with existing and planned green routes will be to provide a coherent and comprehensive network of east – west and north – south linkages providing permeability within Harbour Point and connecting with external destinations including Bray town centre and Bray Daly railway station.

4.7 Integration with Existing Areas

The proposed development has been designed in response to the existing site context and development in the area. The rationale for *Harbour Point Masterplan* and subject application is to provide for the logical and coherent growth of Bray. The scheme is designed as a new urban quarter, with its own unique character and sense of place but merging seamlessly and respectfully with the existing built form of Bray town with a comparable scale and urban grain.

High quality pedestrian / cycle linkages with the surrounding environment including Bray town centre, Bray Daly railway station, Corke Abbey Valley Park, Dargle Boardwalk and the coastal harbour and waterfront are proposed. The proposed north-south path along the eastern boundary of the site has been upgraded from that which was previously permitted under **ABP Ref. 311181-21** to provide a shared footpath and cycleway with a minimum width of 3 metres. The design allows for connections to Corke Abbey Valley Park in the northern boundary and a future connection, subject to Wicklow County Council approval, with the existing footpath to the south of the site at the railway underpass.

These external linkages will be complemented by a high degree of internal permeability, with the focus on pedestrian movement through a sequence of streets, squares and public spaces so that all services are within walkable distances for residents and those visiting.

With two new schools immediately to the west of the subject site, an existing Lidl supermarket to the west on Dublin Road, Bray town centre to the south and amenity areas to the north and west provided by Corke Abbey Valley Park, Bray Harbour and Promenade the provision of significant residential development immediately adjacent to the existing services and facilities directly strengthens the integration of the proposed development into the existing community.

As part of the future proofing of the site the proposed development has been designed with cognisance of the proposed public transport bridge (now subject to a Part 8 consent process) and proposed LUAS extension. The proposed horizontal and vertical alignment of the realigned link street has been generated off the current Part 8 design information provided by Wicklow County Council.

Proposed design measures are set out in detail Figures 21 and 26 in the *Architectural Design Statement* prepared by Glenn Howells Architects submitted as part of the application package.

4.8 County Boundary

The County Boundary between Dublin and Wicklow runs across the site and provides an opportunity for placemaking. The layout of units and specific landscape features respond to the boundary. Blocks A and B have been located to allow the boundary line to run through the open space between the blocks and two blocks of the terraced housing along the western boundary have been aligned to keep the boundary line within an area of open space running between the two blocks. The locally known 'Nun's Walk' will be

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defined by engraved paving slabs laid through the public open space area located between apartment blocks A and B to echo the alignment of this linear earthwork along with the alignment of the boundary between Dublin and Wicklow. This proposal is further detailed in the *Landscape Design Strategy* prepared by Park Hood Landscape Architecture.

4.9 Materials and Finishes

High quality materials and finishes have been carefully selected to ensure consistency with existing surrounding developments while creating a strong sense of identity and distinctiveness informed by the *Harbour Point Masterplan*.

The *Harbour Point Masterplan* sets out a design strategy for the modern reinterpretation of the Bray town centre urban building typologies and their coastal context including the choice of materials. The proportions of façades and key features, such as windows and doors, are referenced in a contemporary manner to the new terraced houses and duplex apartments.

The vernacular material palette in Bray is predominantly render with limited decorative mouldings around doors, windows, and at eaves level. This is particularly prominent in locations along the Seafront Promenade and Quinsborough Road, where most houses are rendered. Occasionally red brick is used in Bray, typically at first and second floor level over ground floor render. Stone was rarely used on the façades of Bray residential buildings but it can typically be seen used on plinths or as garden walls. A particular feature of Bray is the prominent use of wrought iron balconies, complementing the ironwork used on garden railings.

The Coastal Quarter seeks to reference this simple palate of materials in a contemporary manner utilising render but introducing brick in key buildings and locations due to the development's location within a coastal setting.

The proposed apartment blocks in addition to the duplexes adjacent to the Green Spine are to be built using light coloured brick. Key to this design choice has been a material that is robust and hard wearing that will also add to the 'light and airy' Bray aesthetic. Mortar colour will also be light, that when combined with a light colour window frame will give the aesthetic appearance of an elegant coastal building akin to the large hotels of the past.

The proposed houses to the Coastal Quarter development are to be built using a small number of differing pastel render colours. The colours will be carefully selected using colours already used in Bray allowing this development to feel like an extension to the existing.

The front driveways of the houses will have a mixture of coursed rubble and brick paths, allowing easy access to the bin and bike stores and the front doors to the front of the houses. The brick front walls will have both railings attached to them and hedge planting behind them. This will give the street edges a sense of solidity and definition and a sense of softness created by the hedge planting.

In order to create a new district that is robust and has the ability to weather well and in a controlled manner, the design team has looked at how the architectural detailing of traditional successful buildings in Bray has maintained their elegant aesthetic for over 100 years after construction. Key to the detailing strategy has been large overhangs on sills and copings and the breaking up of large expanses of masonry materials with bay windows, doors and balconies. To ensure there is a successful dialect between the existing and the proposed, a series of key architectural details has been identified that is not only aesthetically pleasing but also works with materials to manage water. It is crucial that all copings, capping's, and sills project at a minimum of 40mm from the window reveal with a throating or drip detail to disperse water. Lintel details above door openings and window aperture should be integrated to shed water away. In addition, there are no large expanses of masonry materials on the façade, with all facades benefiting from the visual relief of balconies or windows creating shadowing and interest on the facades.

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All character areas will benefit from the use of robust high-quality materials and extensive planting that build on the development's coastal location and make a virtue of some of the wilder coastal grasses, shrubs, meadows, and lawns that this area is known for. Native species are specified where possible helping to enhance and support the biodiversity of the area. Further details on the proposed landscape specifications are provided in the *Landscape Design Strategy* prepared by Park Hood Landscape Architects and *Building Lifecycle Report* prepared by Atkins.

4.10 Boundary Treatments

The proposed development will include a range of boundary treatments to ensure that appropriate interfaces with neighbouring properties and public spaces are provided. Retention of boundary vegetation and reinstatement/replacement of native planting is a key element of the landscape design strategy.

To the east a linear park landscape between the proposed residential units and the existing railway line is proposed. The Coastal Gardens will create a meandering footpath/cycleway link along the eastern boundary and will have large swathes of meadow, ornamental grasses and herbaceous planting all coastal tolerant to provide seasonal interest and maintain the biodiversity benefits of the site. The Coastal Gardens will have mixed native hedge planting along the existing railway boundary fence to help visually screen the fence and maintain existing bat flight routes. A solid 2.4m high wall, as a requirement of C oras Iompair  ireann, will be provided.

To the north an existing woodland setting area shall be augmented across the northern boundary of the site integrating Block D into the landscape and with the adjacent existing residential development. A 1.2m fence shall be provided along the extent of the northern boundary apart from a section proximate to Block D where a 1.8m fence shall be provided.

The Orchard (Area H) marks a key entrance to the development and has been designed to bring an aesthetic and usable space to what is currently a below ground wastewater pumping station. The design intent of the scheme is to create a strong frontage on the approach to the development which screens the infrastructure and creates visual continuity with the boundary treatment to the adjacent school development. A matching low stone wall and railing is softened by hedge and tree planting and flows into a higher stone wall that defines the entrance to the development. This higher stone wall will carry a name sign to mark it as a primary entrance to the Coastal Quarter development.

A native screen planting buffer will also be created along the site boundary with the school to maintain existing bat flight routes in the locality. A 2.4m wall with rendered finish shall be provided along the western boundary at the rear of residential units. To the south the Coastal Quarter shall connect with the River Quarter as provided for in the *Harbour Point Masterplan*.

Further detail on boundary treatment is provided in the *Landscape Design Strategy* prepared by Park Hood Landscape Architects and the *Architectural Design Statement* prepared by Glenn Howells Architects.

4.11 Childcare Facility

A *Childcare Demand Analysis* has been prepared by RPS and is enclosed as part of the application package. Based on the demand analysis the following apply:

- A rigid application of the *Childcare Facilities – Guidelines for Planning Authorities* (Childcare Guidelines) excluding one bed units would necessitate the provision of a childcare facility with 92 no. places.
- Applying the Childcare Guidelines excluding one bed units and 33% of two bed units would necessitate the provision of a childcare facility with 72 no. places.

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- A robust analysis of projected childcare demand, allowing for mix of units proposed, household size, childcare practises and the ECCE Programme, found that demand generated by the proposed development for 0 – 4 years childcare places shall be no more than 63 no. places.

Considering existing and permitted childcare facilities in the study area, population demographics, relevant policy and guidelines, it is concluded that a childcare facility with a mid-point between the maximum and minimum estimate providing 88 no. childcare places will exceed the demand generated by the proposed development. It is considered that a childcare facility with capacity for 88 no. spaces (as permitted under ABP Ref. 311181-21) has more than sufficient capacity to meet demand generated by the subject development.

4.12 Access, Linkages and Connectivity

The proposed development will be accessed via 2 no. existing vehicular accesses onto Dublin Road (R761) from the Ravenswell Road Junction and from the School Junction in addition to 3 no. dedicated pedestrian and cycle accesses from the Ravenswell Road, the railway line underpass from Bray Harbour and Corke Abbey Valley Park. Street typology and green links will be aligned with public plazas and open spaces to create a strong urban layout that ensures visual permeability through the site to create a highly legible network of pedestrian and cyclist routes. The proposed pedestrian / cycle routes will tie in with a wider network of routes within the *Harbour Point Masterplan* area. The geometry of roads within the proposed scheme cater for all forms of movement however the layout of the proposed development has been designed to favour walking, cycling and public transport and to tie in with the planned public transport bridge.

Existing and proposed pedestrian and cyclist connections include:

- Existing connection to Bray Daly railway station and Bray Promenade via railway line underpass;
- Existing connection to Bray Town Centre via riverwalk along Dargle River and via Ravenswell Link Road;
- Existing connection to Dublin City via the R761 (Dublin Road) which includes dedicated footpaths and cycle lanes;
- Proposed connection to the north into existing park lands (Corke Abbey Valley Park), adjacent developments future pedestrian and cyclist connections;
- Connection to Bray Daly railway station via public transport bridge proposed by WCC;
- Proposed pedestrian and cyclist improvements on Castle Street bridge;
- Improved pedestrian and cyclist facilities to Dublin City Centre provided as part of Bus Connects - Core Corridor 13 Scheme; and
- East Coast Trail, delivery of which is ongoing.

Further details on connections, access and emergency access are provided in the *Traffic and Transport Assessment* prepared by Atkins.

4.13 Bicycle Parking Strategy

4.13.1 Apartments

The minimum bicycle parking rates within the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020* of 1 no. bicycle space per bedroom for residential and 1 no. bicycle space per 2 no. units for visitors will be provided. The table below details the proposed residential bicycle parking provision.

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Table 4-7: Resident Cycle Parking

| Apartment Unit | No. of Apartments | Resident Ratio | Resident Parking Requirement | Resident Parking Proposed | Visitor Parking Ratio | Visitor Parking Requirement | Visitor Parking Proposed |
|----------------------|-------------------|----------------|------------------------------|---------------------------|-----------------------|-----------------------------|--------------------------|
| Block A | 79 no. 1 bed | 1 per bedroom | 79 | | 1 per 2 units | 39.5 | |
| | 76 no. 2 bed | 1 per bedroom | 152 | | 1 per 2 units | 38 | |
| | 7 no. 3 bed | 1 per bedroom | 21 | | 1 per 2 units | 3.5 | |
| Total Block A | | | 252 | 277 | | 81 | 81 |
| Block B | 94 no. 1 bed | 1 per bedroom | 94 | | 1 per 2 units | 47 | |
| | 86 no. 2 bed | 1 per bedroom | 172 | | 1 per 2 units | 43 | |
| | 10 no. 3 bed | 1 per bedroom | 30 | | 1 per 2 units | 5 | |
| Total Block B | | | 296 | 326 | | 95 | 95 |
| Block C | 45 no. 1 bed | 1 per bedroom | 45 | | 1 per 2 units | 27.5 | |
| | 31 no. 2 bed | 1 per bedroom | 62 | | 1 per 2 units | 15.5 | |
| | 4 no 3 bed | 1 per bedroom | 12 | | 1 per 2 units | 2 | |
| Total Block C | | | 119 | 126 | | 40 | 64 |
| Block D | 20 no. 1 bed | 1 per bedroom | 20 | | 1 per 2 units | 10 | |
| | 6 no. 2 bed | 1 per bedroom | 12 | | 1 per 2 units | 3 | |
| Total Block D | | | 32 | 62 | | 13 | 14 |
| Total | | | 699 | 791 | | 229 | 254 |

Source: Traffic and Transport Assessment

4.13.2 Non Residential Uses

The non-residential uses are located within the WCC administrative area. **Table 4-7** below details the WCDP maximum rate and the development provision.

Table 4-8: Non Residential Cycle Parking

| Non-Residential Use | Area | WCC Minimum Bicycle Parking Rate (Table 7.2 of CDP) | WCC Minimum Bicycle Parking Requirement | Development Proposed Bicycle Parking Rate | Development Bicycle Parking Proposal |
|-------------------------------------|-------------------------------------|---|---|---|--------------------------------------|
| Commercial Unit (Gym and Juice Bar) | 512sq.m. | 20% of employee numbers subject to minimum of 10 bicycle places or one bike space for every car space, whichever is the greatest. | - | 1 per parking space | 5 |
| Creche | 627sq.m. (16 staff and 80 children) | None provided | - | 1 per 4 staff and 1 per 10 children | 4 for staff + 8 drop-off |
| Retail unit | 249 sq.m | 1 space for every 10 car spaces | 1 | 1 space for every 10 car spaces | 1 |
| Café | 195 sq.m | 1 space for every 10 car spaces | 1 | 1 space for every 10 car spaces | 1 |

Source: Traffic and Transport Assessment

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In addition, further secure bicycle parking will be provided at cargo bicycle spaces are also provided within the mobility hub at the Orchard site. This is explained further in the *Traffic and Transport Assessment* by Atkins.

4.14 Motorcycle Parking Strategy

Motorcycle parking is provided within the apartment under-croft areas in line with the DLR Development Plan at 4 spaces per 100 car parking spaces. As such a total of 24 no. motorcycle spaces are provided as follows:

- Block A – 12 no. spaces
- Block B – 10 no. spaces
- Block C – 2 no. spaces
- Block D – no spaces

4.15 Car Parking Strategy

4.15.1 House and Duplex Units

Given the sites location within the developed urban area and direct proximity to both DART and bus public transport services, Bray town centre, schools, retail, leisure amenities etc. the car parking proposal to be applied to the house and duplex units is outlined below:

- 1 resident space for 2 Bed Units;
- 1.5 resident spaces for 3 Bed Units;
- 2 resident spaces for 4 Bed Units; and
- 1 visitor space per 10 units

This parking proposal is below the standard requirements of both the DLRCC and Wicklow County Development plan but is in accordance with both Councils' policies to promote the reduction of car use in new developments in close proximity to public transport services and proximity to Town Centre.

Applying these standards to the proposed house and duplex units results in a total requirements of 192 No. units, of which 179 no. are to be assigned to residents with 13 no. for visitors.

4.15.2 Apartment Buildings

Given the site location it can reasonably be classified as an intermediate urban location with central location characteristics with reference the provisions of the *Design Standards for New Apartments*. Whilst a specific standard for intermediate locations is not stated, the range of provision extends from 1 car space per unit for residential and 1 car space per 3-4 units for visitor in peripheral locations to potentially zero provision in a central location. As set out in the enclosed TTA by Atkins, it is submitted that the appropriate provision in this location is well below the potential one space for unit provision in peripheral locations. On this basis the following rates are proposed:

- A range of 0.72 to 0.60 per unit for residential parking; and
- 1 no. visitor space per 20 no. units.

Based on this ratio, and as detailed in Table 5.2 of the TTA, a total of 322 no. parking spaces are required and proposed for the apartments, of which 299 no. will be assigned to the apartment residents and 23 no. spaces will be allocated for apartment visitors. The locations of these spaces are illustrated on Atkins drawings 5213890-ATK-01-ZZ-DR-CE-0119 and 5193890-ATK-01-ZZ-DR-CE-0120.

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4.15.3 Non-Residential Uses Car Parking

The non-residential uses proposed are located within the administrative area of WCC. The quantum of car parking proposed is below or aligned with the maximum rate for non-residential uses. A rigid application of the WCDP standards would result in a maximum provision of 47 no. spaces (39 no. plus 8 no. set-down) spaces. It is proposed to provide a total of 26 no. for these uses (of which 4 no will be set-down). 35 no. spaces and 4 set down spaces. The parking provision proposed provides for dual usage of space throughout the day as detailed in section 5.3 of the TTA.

Under **ABP Ref. 311181-21** it was proposed that car parking spaces associated with non-residential uses be accommodated in the Orchard parking area. The Orchard area sits above a critical piece of Irish Water infrastructure associated with the Bray Pumping Station to the south of the River Dargle. This facility is regulated under EPA licence Ref. D0038-01. Condition 4 (d) attached to the ABP Order under Ref. 311181-21 requires that,

“Car parking spaces at ‘The Orchard’ car park shall be omitted and in its place an area of open space shall be delivered, with design and boundary details to be agreed, and access maintained for maintenance vehicles servicing the wastewater infrastructure.”

Consistent with this previous ABP permission, no car parking is now proposed at the Orchard.

4.15.4 Car Club Parking

It is proposed to provide 2 no. car club spaces within the Coastal Quarter. Based on the uptake of the scheme there is potential to provide additional car sharing spaces based on demand. In overall terms car sharing spaces can replace up to 15 no. traditional car parking spaces. Allocation of these spaces is as shown on Atkins drawings 5214419-ATK-01-ZZ-DR-CE-0119 and 5214419- ATK-01-ZZ-DR-CE-0120.

4.15.5 Disabled Parking

The development will provide 23 no. disabled parking spaces. This is in accordance with development plan standards and is further detailed in the enclosed *Traffic and Transport Assessment* prepared by Atkins.

4.15.6 Electric Charging Points

The development will provide E-Car charging points at a rate of 10%. All remaining spaces will be provided with the infrastructure to enable E-Charging in the future.

Table 4-9: EV Charging Parking Spaces

| Location | Total Spaces | Proposed E-charging |
|--------------------------------------|--------------|---------------------|
| On street and On Curtilage | 223 | 20 |
| Undercroft / basement parking spaces | 326 | 46 |
| Total | 549 | 66 |

Source: *Traffic and Transport Assessment*

The allocation of these spaces is as shown on Atkins drawings 5214419-ATK-01-ZZ-DR-CE-0119 and 5214419-ATK-01-ZZ-DR-CE-0120.

It should be noted that all of the on-curtilage parking will be fully served by EV ducting to be activated as required in the future by the individual owners.

Further detail on electric charging is provided in the TTA prepared by Atkins.

4.16 Site Services

4.16.1 Lighting

The application proposes street lighting throughout the residential development as an integral part of the scheme. The lighting plan has been designed to provide a level of brightness that will minimise incidences of light spillage or pollution on the neighbouring developments and biodiversity in the surrounding area. This lighting design is integrated with the landscape strategy. Detailed lighting proposals are set out in the *MEP Engineering Report & Energy Statement* and associated drawings prepared by Atkins are enclosed as part of this submission.

4.16.2 Refuse Collection and Deliveries

Refuse collection and deliveries will be facilitated through the design of the streets to a design vehicle refuse truck. Refuse and delivery vehicles are predominantly facilitated via looped streets that facilitate through movement of such vehicles. In instances where a looped route is not possible turning is facilitated via turning heads.

Vehicles making deliveries to houses, duplex units and Block D will be appropriately accommodated by parking on street on the local and homezone/community streets which will carry low traffic volumes and wherein there is adequate space for other traffic to pass a delivery vehicle.

Delivery and refuse vehicles servicing the Block A, Block B and Block C apartment units will be appropriately accommodated within the bays provided adjacent to these units.

4.16.3 Refuse Bins

Each residential unit shall have adequate storage provision to facilitate the recycling of waste. Each apartment building will have a communal bin store or stores on the ground floor level. The retail and childcare facility will have separate ground level waste stores. Each communal waste room will contain facilities for streaming recyclable material.

The waste areas are easily accessed by residents, management staff and refuse collectors. All residents have ease of access to a bin store close to the core serving their individual apartment so that residents do not have to walk a distance across the ground floor car parking to centralised stores in large buildings. Waste from the ground floor waste stores can be taken at grade to collection points outside the buildings by either the management company or waste collection companies. The waste storage facilities will be adequately ventilated to minimise odours and potential nuisance from vermin/flies thereby ensuring the avoidance of nuisance for habitable rooms above.

Further details are set out in the *Outline Operational Waste Management Plan* prepared by Atkins and the *Housing Quality Assessment* prepared by Glenn Howells Architects enclosed as part of this application.

4.16.4 ESB Substation

Two substations are required to support the proposed development. The requirements of the ESB in this regard are set out in the *MEP Engineering Report & Energy Statement* prepared by Atkins.

4.17 Drainage and Water Services

4.17.1 Surface Water

Surface water drainage for the proposed development site will employ SuDS techniques including permeable paving, swales in park areas adjacent to roads, green roofs, filter drains to rear gardens, modular underground attenuation and flow control devices and will outfall via attenuation/storage tanks. Further details are provided

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in the *Engineering Planning Report*, *Stormwater Impact Assessment Report* and *Flood Risk Assessment Report* prepared by Atkins and submitted as part of the application package.

4.17.2 Foul Drainage

The new development will be catered by a proposed 225mm diameter foul sewer with a single outfall to a proposed manhole that will be constructed as part of the future foul network reinforcement project to be carried out by Irish Water. The *Confirmation of Feasibility* from Irish Water is contained in Appendix A of the *Engineering Planning Report* prepared by Atkins.

To facilitate the construction of the proposed development, part of the existing Irish Water foul infrastructure will be diverted away from the proposed buildings. An Existing Foul Drainage Diversion Application was submitted to Irish Water for the proposed changes and a letter confirming feasibility from Irish Water was received. This is contained in Appendix C of the *Engineering Planning Report* prepared by Atkins.

The *Statement of Design Acceptance* from Irish Water is provided in Appendix B of the *Engineering Planning Report* prepared by Atkins.

4.17.3 Water Supply

There is currently no water supply infrastructure present on site. Irish Water issued a Confirmation of Feasibility (COF) letter, and this is contained as an Appendix in the *Engineering Planning Report* prepared by Atkins.

A 225mm diameter watermain is proposed to run the 675m east from the existing 225mm watermain on the Upper Dargle Road to the proposed site to facilitate water supply to the proposed development.

Irish Water issued a Statement of Design Acceptance, a copy of which is contained as an Appendix in the *Engineering Planning Report* prepared by Atkins.

4.17.4 Flood Risk Assessment

A *Flood Risk Assessment* prepared by Atkins is included with the application. A detailed and robust analysis of the flood risk at and in the vicinity of the proposed development was undertaken. This assessment concludes that the development as proposed shall not result in an adverse impact to the existing hydrological regime of the area nor increase flood risk to areas outside of the landowners' holdings, nor create unacceptable levels of flood risk within the proposed development and is therefore considered to be appropriate from a flood risk perspective.

4.18 Taking in Charge

The proposed taking in charge of areas across the Coastal Quarter are identified on drawing BRA-GHA-SW-ZZ-DR-A-05007 prepared by Glenn Howells Architects. The main access road leading to the future public transport bridge and the link from this road to the rail underpass will be taken in charge by the local authority.

The Coastal Quarter will in the main be retained within the control of the Owner Management Company. Public areas shall however be designed and constructed to a standard which may be taken in charge.

A *Property Management Strategy Report* prepared by Aramark provides details with respect to the management of public spaces, communal areas, parking and shared facilities.

4.19 Part V (Social Housing)

In accordance with Section 96, Part V of the *Planning and Development Acts 2000*, a total of 62 no. units will be transferred to the planning authorities for social and affordable housing comprising:

- 28 no. units in DLRCC; and
- 34 no. units WCC.

The location of units proposed to be transferred to meet Part V requirements are illustrated in the Part V drawings BRA-GHA-Z1-XX-DR-A-04001 and BRA-GHA-Z1-XX-DR-A-04002 prepared by prepared by Glenn Howells Architects and enclosed as part of the application package. A summary of costings in relation to Part V is also included with this application along with letters of agreement from both Wicklow County Council (22.08.22) and Dún Laoghaire Rathdown County Council (11.08.22).

5 ENVIRONMENTAL APPRAISALS

5.1 Environmental Impact Assessment Report

The obligations under Directive 2014/52/EU have been transposed into Irish law pursuant to the *European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I No. 296 of 2018)*. The regulations specify the developments for which EIA will be required and the information that must be provided in an EIAR prepared in connection with the subject project.

The proposal has been screened by reference to the Planning and Development Acts 2000 and the Planning Regulations.

The proposed development is a category 10 “*Infrastructure projects*” of Part 2 of Schedule 5 of the Planning Regulations. Thresholds provided under 10 Infrastructure projects (b) are:

- “(i) *Construction of more than 500 dwelling units.*
- “(ii) *Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.*
- “(iii) *Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.*
- “(iv) *Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.*

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)”

The relevant thresholds relating to the proposed development are items (i).

The subject development comprises 586 no. residential units on site of c. 8.81 hectares in Bray. As the project exceeds the relevant threshold then an Environmental Impact Assessment (EIA) is a mandatory requirement and must therefore be undertaken to assess the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the proposed development.

An Environmental Impact Assessment Report (EIAR) co-ordinated by Atkins has been prepared and accompanies the planning application. The EIAR and is set out in 3 no. volumes as follows:

- Vol. 1 - Non-Technical Summary
- Vol. 2 - Main Document
- Vol. 3 – Appendices.

5.2 Natura Impact Statement

An appropriate assessment screening has been undertaken and a *Natura Impact Statement* (NIS) has been prepared by Atkins and is enclosed as part of this application. The appropriate assessment screening and NIS document seeks to establish whether or not the proposed development is likely to have a significant effect on any designated European Site under European Council Directives 92/43/EEC and 2009/147/EC. In particular the NIS addresses potential impacts on the Rockabill to Dalkey Island SAC.

The exercise considers the proposed works individually and in combination with other relevant plans or projects and has been undertaken based on the best available scientific information. Following a comprehensive evaluation of the potential direct, indirect and cumulative impacts on the qualifying interests of the SAC and the implementation of the proposed mitigation measures, it has been concluded by the authors of the NIS that there will be no residual impacts and the proposed project will not have an adverse effect on the integrity of the Rockabill to Dalkey Island SAC or any other European site.

6 ASSESSMENT OF KEY PLANNING ISSUES

This section discusses key planning issues that are of relevance to the proposed development including issues highlighted during pre-planning consultations and issues that arose in the previously permitted development for the subject site. The proposed development's consistency with national, regional and local policies and objectives are set out in **Section 7** of this document.

6.1 Density

The application site boundary extends to 8.81 hectares. Part of the site is devoted to the land use zoning objective 'F', thereby reducing the level of developable area. In addition, part of the application site boundary includes services / utility connections outside the immediate area of the Coastal Quarter development. Excluding these areas results in a net developable site area of 7.28 hectares. Therefore, the proposed development comprises of 586 no. residential units in a mix of apartments, duplex and houses on a net site area of 7.28 hectares resulting in a net density of 80 uph. This density is considered appropriate having regard to national and regional policies that seek to achieve more sustainable forms of development within this Key Town within the Dublin Metropolitan Area and the very pressing need for additional housing. It will also represent an improvement on the permitted development through providing a better mix of units whilst maintaining an acceptable density for this location.

The Greater Dublin Area is experiencing a housing crisis with house prices and rents at a high level, making it more difficult and more expensive for people to live reasonably close to employment and social / community facilities. The Covid-19 pandemic slowed the delivery of new housing in 2020 and 2021, with effects still being felt. The chronic housing shortage presents significant social and economic challenges and the undersupply and subsequent cost of housing may hinder Dublin and Ireland's economic growth and social cohesiveness.

To address the housing crisis, national policies have been introduced to support the provision of new, higher density residential developments at appropriate locations. In this regard, *Project Ireland 2040* the government's long-term overarching development strategy for the state is planning for 490,000 – 540,000 additional people in the Eastern and Midland Region. This equates to a total population of around 2.85 million people.

In accordance with national and regional policies and objectives, this anticipated growth must be accommodated through sustainable development, with high quality residential development provided within the city's development boundary to ensure a compact urban form, reduce commuting times and maximise the viability of public transport options. Residential developments should also be located in close proximity to existing services and facilities including retail and employment areas and schools. Objective 3a of the *National Planning Framework (NPF)* states that it is a national policy objective to “*deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements*”. In support of compact growth the *Regional Spatial and Economic Strategy for the Eastern Region* sets out a number of Regional Policy Objectives (RPOs). RPO 3.3 states that “*Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’*” Further to this provision, section 4.3.1 of the *DLRCDP* considers the recommendations of the ‘Sustainable Residential Development in urban Areas’ Guidelines regarding appropriate densities for various types of locations, and having regard to RPO3.3 and 4.3 of the *RSES* states that “*where a site is located within circa 1 kilometre pedestrian catchment / 10 minute walking time of a rail station, Luas Line, Core / Quality Bus Corridor and / or 500 metres / 5 minutes walking time of a Bus Priority Route, and/or 1 kilometre / 10 minute walking time of a*

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Town or District Centre, higher densities at a minimum of 50 units per hectare (net density) will be encouraged” (see **Section 7.4.1** of this Report).

The NPF also states that that “to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”. Objective 35 states that it is an objective to:

“increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights”.*

*our emphasis

The provision of higher densities is further supported by other policy and guidance documents including *inter alia* the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020*, the *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031* and the *Sustainable Residential Development in Urban Areas 2009* (see **Section 7** of this Report).

Having regard for these policy documents, it is considered that the proposed density of 81uph at this location is appropriate given the subject site’s proximity to existing and proposed high capacity public transport services, and existing retail, commercial, community and recreational facilities in the area.

It is also noted that the principle of providing this level of density development on the subject lands was considered acceptable by An Bord Pleanála during its assessment of the previous SHD application on the site under ABP Ref. 311181-21. The density proposed under that previous application was 82 units per hectare. The Inspectors Report stated as follows:

“I do not consider that the proposal represents a material contravention in relation to density and I consider the objectives of the plan are clearly stated in this regard. . . . I consider that the delivery of residential development on this prime, underutilised, serviced site within the urban centre of Bray, in a compact form of higher density (82 units per hectare), would be consistent with the policies and intended outcomes of current Government policy, specifically the NPF, the RSES, the Sustainable Residential Development Guidelines and the Apartment Guidelines, as well as local policies, which all look to secure more compact and sustainable urban development supported by public transport. The proposed residential density of 82 units/ha is acceptable in principle at this location, subject to a qualitative assessment in terms of design and amenity standards, which is discussed in detail in other sections of this report”.

This level of density is also established under permitted development along the DART corridor at Woodbrook SHD (**ABP Ref. 305844-19**) (78 uph based on stated nett site area) and Shanganagh Castle (**ABP Ref. 306583-20**) (85 uph based on stated nett site area).

6.2 Building Height

The proposed development will introduce apartment blocks up to 4, 6, 7 and 12 storeys, to achieve an appropriate density for this highly accessible location in close proximity to existing retail, commercial, community and recreational facilities in Bray.

As noted above the NPF states that “to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”. Objective 35 states that it is an objective to:

“increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights”.*

*our emphasis

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The proposed building heights are in line with national policy and guidance, including the *Urban Development and Building Heights – Guidelines for Planning Authorities* which states:

“in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility”.

The *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* also support a more considered approach to building height:

“general blanket restrictions on building height or building separation distance that may be specified in development plans, should be replaced by performance criteria, appropriate to location”

In this regard, the proposals have been carefully considered in terms of the scale of the area and site, their position within Bray relative to the coastal area and proximate high capacity public transport services.

At a local planning policy level, DLRCC policies in relation to building heights is set out in the County's Building Height Strategy (Appendix 5 of the DLRCDP). The aim of this strategy is:

“to ensure the protection of the built heritage of the County and general residential amenities while encouraging higher densities and heights where appropriate in accordance with the National Planning Framework and the Section 28 “Urban Development and Building Heights, Guidelines for Planning Authorities (and any future Section 28 Guidelines), and to ensure a plan-led approach to the assessment of taller buildings in the County.”

Appendix 5 of the DLRCDP goes on to set out policy objectives with regard to building height. Policy Objective BHS 1 relates to increased heights, identifying areas which may be suitable for such increased height.

“Policy Objective BHS 1- Increased Height. It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NP0 35, SPPR 1& 3). Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria. Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”

With reference to policy objective BHS 1 it is noted that the subject site is located within a designated key town and within 1,000m of a DART station and is therefore an appropriate location for taller buildings to be provided within the scope of BHS 1.

Taking into consideration the development already permitted on site and the in response to the commentary of An Bord Pleanála in respect of the previous application ABP-311181-21 the overall approach to massing and height at the subject site is to provide a gradual increase in height and massing from north to south and from west to east. This will avail of the opportunity to accommodate taller elements along the eastern side of

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the site with its open coastal location and in particular at the southwestern area of the site closest to Bray town centre.

This approach allows for an appropriate transition from the lower level existing neighbouring dwellings to the west. Buildings proposed adjacent to existing properties are for the most part 2-3 storeys to provide a gradual transition in height and prevent overlooking or excessive overshadowing. Block D however is capable of accommodating some increased height given its location adjacent to the open Corke Abbey Valley Park offering passive surveillance to this linear walk. It nevertheless steps up only to 4 storeys in response to the previous opinion issued by the Board (ABP Ref. 308291-20), and which height was considered appropriate given its grant of permission under ABP Ref. 311181.

The taller apartment blocks (Blocks A and B) have been appropriately scaled and are strategically located on the site to optimise their outlook with respect of the coastline and identify Harbour Point as new addition to Bray's Seafront.

Potential impacts on access to daylight and sunlight have been carefully considered, with appropriate separation distances and building heights provided to mitigate against any unacceptable levels of overshadowing in accordance with recommended best practice standards. Further information in relation to daylight, sunlight and overshadowing is set out in the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau which is enclosed as part of the planning documentation.

The proposed development has also been designed to ensure passive surveillance is provided over public open spaces. Windows of proposed new dwellings are located to overlook the proposed public spaces, linear walks, communal courtyards and play areas safeguarding public safety and discouraging anti-social behaviour. In this regard, the proposed development will create new, high quality amenity spaces that are inviting and safe to use.

Section 2.2 of the DLR Building Heights Strategy identifies a number of arguments for higher and tall buildings. The proposed height strategy incorporated in the Coastal Quarter design response delivers on a number of these identified arguments:

Sustainability and Density: The heights proposed combined with the overall design and layout response at the site will achieve a high-density development in an area close to Bray town centre and well served by social facilities thereby minimising the need to travel. It is also well served by existing and planned public transport minimising the need for travel by private car.

Landmarks along Waterfronts: The inclusion of the 12 storey element at the southern part of the site will present as a visible marker of the Coastal Quarter and overall Harbour Point development from coastal views to the north and south of the site as well as views from sea.

Tall Buildings along Major Transit Corridors: The taller elements of the proposed scheme are located immediately adjacent the DART / mainline railway corridor. It will mark the arrival to the town centre of Bray for rail passengers.

Landmarks that Enhance Borders and Gateways: The Coastal Quarter straddles the jurisdictions of Dún Laoghaire Rathdown and County Wicklow. The taller element of Block B marks the start of the jurisdiction of County Wicklow and the cluster of Blocks A and B coastal frontage marks the boundary in general.

Section 2.3 of the Building Heights Strategy identifies arguments against Higher Buildings. These comprise impact on strategic and local views, impact on microclimate, implications for the preservation of residential environments and amenity spaces and finally construction and maintenance cost issues. These matters are addressed in various supporting documentation submitted with this application. In particular the EIAR addresses landscape and visual impact issues and microclimate factors. Residential amenity is addressed in a variety of documentation including the Architectural Design Statement. With reference to these factors identified in section 2.3 of the Building Heights Strategy, it is submitted that there are no arguments against higher buildings of the scale proposed at the subject site.

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Table 5 in Appendix 5 of the DLRCDP sets out performance criteria to be addressed in the assessment of taller buildings. Section 4.3.1 of the DLRCDP requires that applications for all developments with heights greater than 4 storeys should provide a height compliance report indicating how the proposal conforms with these criteria. These criteria and the *Urban Development and Building Heights – Guidelines for Planning Authorities* are addressed in Section 3 of the enclosed *Architectural Design Statement* which sets out how the proposed development addresses each of the criteria.

The WCDP does not include a dedicated height strategy. Building heights are dealt with in Development Design Guidelines contained in Appendix 1 of the WCDP which at 5.23 notes that, “*Building heights should be appropriate to the design and scale of development proposed and to that of the adjoining area.*”

It should be noted that previous development permitted under Reg. Ref 07/630194, ABP Ref. PL39.230246 and Reg. Ref. D07A/1495, ABP Ref. PL06D.230215 provided for similar heights as those generally proposed within the application site. Within DLRC residential units in 7 no. residential blocks ranging in height between 2 to 8-storeys were permitted while in WCC the general scale of the permitted development in the mixed use zone is 5 to 7-storeys in height while that to the north in the residential element (Blocks 3 and 4) is between 4 and 8 storeys. An extension of duration for Reg. Ref 07/630194, ABP Ref. PL39.230246 within WCC was granted and will now expire in 2025. The 12 storey element now proposed in Block B exceeds the previously permitted heights, but for the reasons noted above (with reference to section 2.2 of the DLR Building Height Strategy) it is considered appropriate to include this local landmark feature within this particular corner of the site.

The range of heights proposed allow a reasonable level of density be provided at a location within Bray, a designated ‘Key Town’ and served by high capacity public transport. Further analysis of the proposed building height is provided in the *Architectural Design Statement* prepared by Glenn Howells Architects.

6.3 Design Scale and Mass

The design, scale and mass of the proposed houses, duplex units and Apartment Blocks C and D have already been determined to be acceptable by An Bord Pleanála with reference to the permission granted under ABP Ref 311181-21. The Blocks A and B which were proposed under that previous application however were refused permission on the basis of “poor design in terms of facade treatment and architectural expression, in combination with their disposition on the site” and were accordingly not considered to constitute an adequate design response to the context and the opportunity presented on this coastal urban site.

In developing the proposed designs for Blocks A and B submitted with this current SHD application, the design team explored several massing options which considered alternative ways to respond to the ABP reasons for refusal. These are explained in detail in the enclosed *Architectural Design Statement*. While there were benefits to all of the options considered, the design team concluded that in keeping with Bray as a wider district, buildings should carefully blend with the architecture of Bray while having a distinct modern architectural quality of their own. This led the team to design four distinct architectural languages to Block A (A1 & A2) and Block B (B1 & B2) with variations in massing, fenestration, materiality, colour and balcony detail.

Blocks A and B are each subdivided into two discrete blocks (A1, A2, B1 and B2) with the gap between each sub-block approximately equalling the gap between Blocks A and B. Thus a rhythm of four blocks is established, with the final block (B2) given an accent of additional height. This is a classical compositional device. The gaps between the sub blocks coincide with the termination of the homezone streets of the consented scheme creating vistas along these streets and direct visual connections to the sea beyond. Each block is further modelled so as to step downwards to the west to respect the scale of the consented scheme. Finally, the detailing, colour and materiality of each of the 4 blocks is subtly different so as to create the illusion of four discrete buildings of a scale that respects both the elements of the scheme consented under 311181-21 and the scale of the traditional Edwardian villas and hotels along the Bray Promenade.

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The proposed massing of Blocks A and B as now proposed steps from 4 storeys at its north-west corner (having regard to the adjacent consented 3 storey duplex units) increasing up to between 12 storeys to the south-east corner. Core to the massing philosophy was the gradual increase in massing and density when moving from the suburban areas around Cork Abbey Park towards Bray town centre and the ability of the areas overlooking the Irish Sea to accommodate greater mass. At ground level, careful attention has been placed in how Blocks A and B connect with the adjacent roads and parkland. A combination of commercial units, entrance lobbies, apartments and carefully considered plant room/ventilation facades provide a considered and active ground floor frontage. The landscaping has been moulded to anchor the building into the ground and conceal to the maximum extent ventilation ducts required for the car parking areas and service access doors. Generally, the first floor level is set approximately 1m to 1.5m above the adjacent outside ground level to ensure the active supervision of the public realm is achieved while at the same time the privacy of the apartment is respected.

To the south eastern corner, the entrance to the coastal path has been substantially increased to create a more inviting gateway from the railway underpass into the Coastal Quarter. The pedestrian underpass is considered one of the key gateways into the scheme and is therefore the location of the 'landmark' taller element of the proposed scheme. At ground level the visitor is greeted by a double height space on the corner with a juice bar at ground level and gym at 1st floor/mezzanine level. These two uses will ensure continuous activity at this key location 18 hours a day. Tables and chairs on a south facing outside terrace associated with the juice bar will further animate this space.

6.4 Sunlight and Daylight Access

Potential impacts on access to daylight and sunlight have been carefully considered, with appropriate separation distances and building heights provided to mitigate against any unacceptable levels of overshadowing in accordance with recommended best practice standards.

A daylight and sunlight analysis of the proposed development has been undertaken by 3D Design Bureau as part of the design process. In this regard:

The analysis of the proposed development included the following assessments:

- An assessment of the levels of Sun on Ground (SOG) to the proposed amenity spaces
- An assessment of Sunlight Exposure (SE) in all habitable rooms of the proposed units tested. This included all rooms on all floors of all apartment blocks and the same selection of houses and duplexes as per the original application.
- An assessment of Spatial Daylight Autonomy (SDA) in all habitable rooms of the units tested. This included all rooms on all floors of all apartment blocks and the same selection of houses and duplexes as per the original application.

Results from the above assessments have shown that the new design of Blocks A & B provides a favourable level of compliance under Daylight and Sunlight assessment. While the level of daylight compliance cannot be directly compared to the previous ADF results produced under the BRE 2 Guidelines, Blocks A & B, in the opinion of the author, perform better than previously proposed. The reassessment of the previously granted units shows they are performing well.

The scheme as a whole shares this favourable compliance rate throughout blocks C & D and the chosen house types and duplexes that were assessed. Furthermore, while no internal Sunlight Exposure (SE) study was carried out for the previous application, the SE study for this application, a new assessment criteria under BRE 3, has demonstrated good levels of compliance. The design of the proposed scheme also offers very good levels of sunlight across all the proposed outdoor amenity areas. Further information in relation to daylight, sunlight and overshadowing is set out in the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau which is enclosed as part of the planning documentation.

6.5 Visual Impact

A *Landscape Visual Impact Assessment* (LVIA) undertaken by Park Hood Landscape Architects forms part of the final application package and is enclosed in Volume 2 of the EIAR.

Although the proposed scheme lies within separate administrative authorities it has been designed in the context of an overall masterplan and is therefore integrated in terms of layout and design. The layout of the overall scheme has evolved by reference to the site topography, orientation and urban grain of the adjoining townscape of Bray. The proposed development seeks to reflect both the linear nature of the Victorian street layout of the town centre south of the river and the natural contours of the site. The urban design strategy promotes a mix of building typologies, building scales, urban spaces and landscaping. The height, massing, design and materiality of block, house and duplex units vary to a sufficient degree to create natural variety and diversity.

The scale of impact that will arise on the existing landscape is measured against the existing land use, landscape character, visual openness of views, distribution of visual receptors, character of the proposal and the context within which it is set. Despite the central location of the site within the urban area only glimpse views are available from the surrounding area.

The visual assessment considers the impacts of the proposed development from selected public short, medium and long range viewpoints around the Bray area. The photomontages show different times of the year, when trees are not in full bloom as discussed in the tripartite meeting. The visual impact assessment form part of the EIAR submitted with the application.

The visual impact assessment concludes that notwithstanding some residual negative impacts the proposed development will have long term benefits created by the development including increased public access to Bray town centre and seafront for the wider community, managed habitats to encourage biodiversity improvement, formal recreation facilities and an increased awareness of the landscape and cultural features on the site.

6.6 Access Connectivity & Traffic

The proposed development of Harbour Point shall provide an extension to the existing town centre that will complement and enhance the existing functions of the town by providing a significant residential development and additional, recreational, retail, offices and amenity spaces. The wider masterplan lands will link both physically and functionally within the existing town centre to create commercial synergy and generate suitable movement thereby improving the vitality and vibrancy of Bray town centre as a whole.

Although the proposed scheme lies within separate administrative authorities it has been designed in the context of an overall masterplan and is therefore integrated in terms of layout and design.

As highlighted in **Section 2**, the subject site is located adjacent to Bray town with retail, commercial, community, educational and recreational facilities in close proximity. The location of the subject site, contiguous to the existing urban fabric greatly enhances accessibility to the site, particularly walking and cycling accessibility.

As detailed in **Section 4.12**, the proposed development will be accessed via 2 no. existing vehicular accesses onto Dublin Road, pedestrian and cycle accesses onto Ravenswell Road, Woodbrook Glen and the waterfront via the DART underpass. The proposed north-south path along the eastern boundary of the site has been upgraded from that which was previously permitted under **ABP Ref. 311181-21** to provide a shared footpath and cycleway with a minimum width of 3 metres. The design allows for connections to Corke Abbey Valley Park in the northern boundary and a future connection, subject to Wicklow County Council approval, with the existing footpath to the south of the site at the railway underpass. These

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connections will encourage the use of more sustainable modes of travel and will provide direct pedestrian / cycle connections with key desire points including Bray town centre and Bray Daly railway station.

The site is located c. 800m north of Bray Daly railway station providing Howth/Malahide to Greystones DART services, Dublin to Dundalk commuter services and main line rail services to Wexford and Rosslare Europort. Existing public bus routes run along the R761 (Dublin Road) providing access to the 45A, 45b, 84, 84A, 84N, 145, 155 and 184 services.

In addition to these existing public transport services, it is noted that very significant public transport upgrades are planned which will further enhance the accessibility of the site.

- The Bus Connects initiative identifies the Bray Core Bus Corridor along the Dublin Road, c. 550m to the west of the subject site. The delivery of the Bray corridor will significantly enhance journey times and includes cycle lanes. Proposed Bus Connects core bus corridor 13 (Bray to Dublin City Centre) is expected to be submitted to An Bord Pleanála in the near future.
- The DART+ Coastal project will add further capacity and improve services on the existing DART line.
- Proposed bus route via the proposed public transport bridge which is now proceeding through a Part 8 consenting process. This bridge will provide for improved connectivity to the site but it is not required to serve the proposed development which will have appropriate access to the DART station via both the existing rail underpass and Riverwalk along with appropriate access to existing bus services along Dublin Road.
- The extension of the LUAS Green Line to Bray town will provide LUAS services directly adjacent to the subject site. While a long term proposal it will ultimately provide a direct service to Dublin city centre through the south of Dublin City and connect with the wider LUAS network and ultimately Metro Link. The proposed development facilitates and integrates with the proposed public transport bridge and the potential future LUAS Line.

Notwithstanding all the benefits the site enjoys for the delivery of a sustainable mode share and the planned enhancement of public transport the proposed development will generate vehicular traffic.

A *Traffic Transport Assessment* has been prepared by Atkins and is enclosed as part of the application package. The statement confirms that:

- The subject site is readily accessible to pedestrians and cyclists in Bray and the wider vicinity;
- The location of the subject site within the existing urban fabric of Bray reduces travel demand as a wide range of services and amenities are available locally;
- The site is well served by public transport, with regular bus services nearby (c.550m) and the DART / commuter services and intercity rail services also located in close proximity (c.800m);
- Proposals under the Bus Connects programme, LUAS expansion plans, the DART+ Coastal scheme and proposals under the Greater Dublin Area Cycle Network Plan will further improve sustainable accessibility; and
- Of the 4 no. junctions that were required to be assessed 3 no. were found to perform well within capacity for all future scenarios/sensitivity. Only the : R761 Dublin Road, Old Connaught Avenue & Corke Abbey Avenue was found to operate over capacity during the AM peak hour. The Opening Year + 5 “Do Something” scenario indicates that the that the maximum degree of saturation increases on the arms is only 5% above that of the existing traffic scenario. This indicates a marginal impact on the junction due to the proposed development.

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Subject to conditions DL RCC and WCC considered the proposed access and connectivity arrangements proposed previously to be acceptable. The Inspector's Report (**ABP Ref. 311181-21**) concluded:

"I am overall satisfied that having regard to the existing context of the site within walking distance of the town centre, location adjoining existing primary and secondary schools, and overall street network including connectivity for pedestrians/cyclists and vehicles, the proposed development would not lead to the creation of excessive traffic or obstruction of road users and I consider the proposal to be generally acceptable in this regard."

The access arrangements and connections now proposed are consistent with, and in some way enhancements from, that which was previously found to be acceptable.

6.7 Local Amenities and Services

Bray recorded a population of c. 32,600 in the 2016 census and a commensurate wide range of amenities and services including health, education, community, cultural, play, faith, recreation and sports facilities are provided within the town.

6.7.1 Education

Within Bray there are a range of primary and secondary schools, including Gaelscoileanna and schools of varying religious / civic patronage with c.2,950 pupils attending primary schools and c.2,900 pupils attending secondary schools in the local area. The locations of these schools are shown in **Figure 6-1** below.

Based on the *National Population Projections and Regional Population Targets 2006-2020* (DEHLG February 2007), the *Provision of Schools and the Planning System: A Code of Practice for Planning Authorities 2008* assumes that an average of 12% of the population were expected to present for primary education. This proportion remains unchanged in 2016. In calculating the demand likely to be generated by the proposed development, the future demand for primary school formula used by the DES (12% x no. units x average household size) can be applied.

The average household size in Ireland is 2.75 as per Census 2016 results, therefore, the formula mentioned applies as follows:

$$12\% \times 586 \times 2.75 = 193 \text{ no. spaces}$$

Based on the calculation above, the proposed development of 586 no. residential units will generate a demand for 193 no. additional primary school spaces, which based on an 8-year cycle translates to 24 school places required for each year of primary school.

Within the proposed development there are 238 no. 1-bedroom apartments which do not have the capacity to accommodate families with children. Excluding the 238 no. 1-bedroom apartments and duplexes and applying the formula mentioned above generates a demand for 115 no. primary school places which translates to 14 no. new school places per year.

Again, based on the *National Population Projections and Regional Population Targets 2006-2020* (DEHLG February 2007), the *Provision of Schools and the Planning System: A Code of Practice for Planning Authorities 2008* assumes that an average of 8% of the population were expected to present for secondary education. This proportion also remained unchanged in 2016.

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In calculating the demand likely to be generated by the proposed development, the future demand for primary school formula used by the DES; (8% x no. units x avg household size) applies. The following results were reached:

$$8\% \times 586 \times 2.75 = 129 \text{ no. spaces}$$

Based on the calculation above, the proposed development of 586 no. residential units will generate a demand for 129 no. additional secondary school spaces, which based on a 6-year cycle translates to 22 no. school places required for each year of secondary school.

Excluding the 238 no. 1-bedroom apartments and duplexes and applying the formula mentioned above generates a demand for 77 no. secondary school places which translates to 13 no. new school places per year.

These figures, which omit 1-bed units are considered to represent a robust calculation of the demand for school places to be generated by the proposed development and are considered more fully in the *School Demand and Concentration Report* prepared by RPS which forms part of the application documentation.

The Inspector's Report (**ABP Ref. 311181-21**) concluded with regard to a proposed development of 591no. units at the subject site:

"I am satisfied, having regard to the information presented with the application, that there is adequate capacity within schools in the area to accommodate the proposed development."

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Figure 6-1: Existing Schools in the Vicinity

Source: Educate.ie / Google Map / RPS

6.7.2 Health

The general locations of a range of healthcare services in Bray and the immediate vicinity is shown in **Figure 6-2**. As shown, there are a range of medical and dental services and pharmacies within the town and Loughlinstown hospital is just over 4km north of the subject site.

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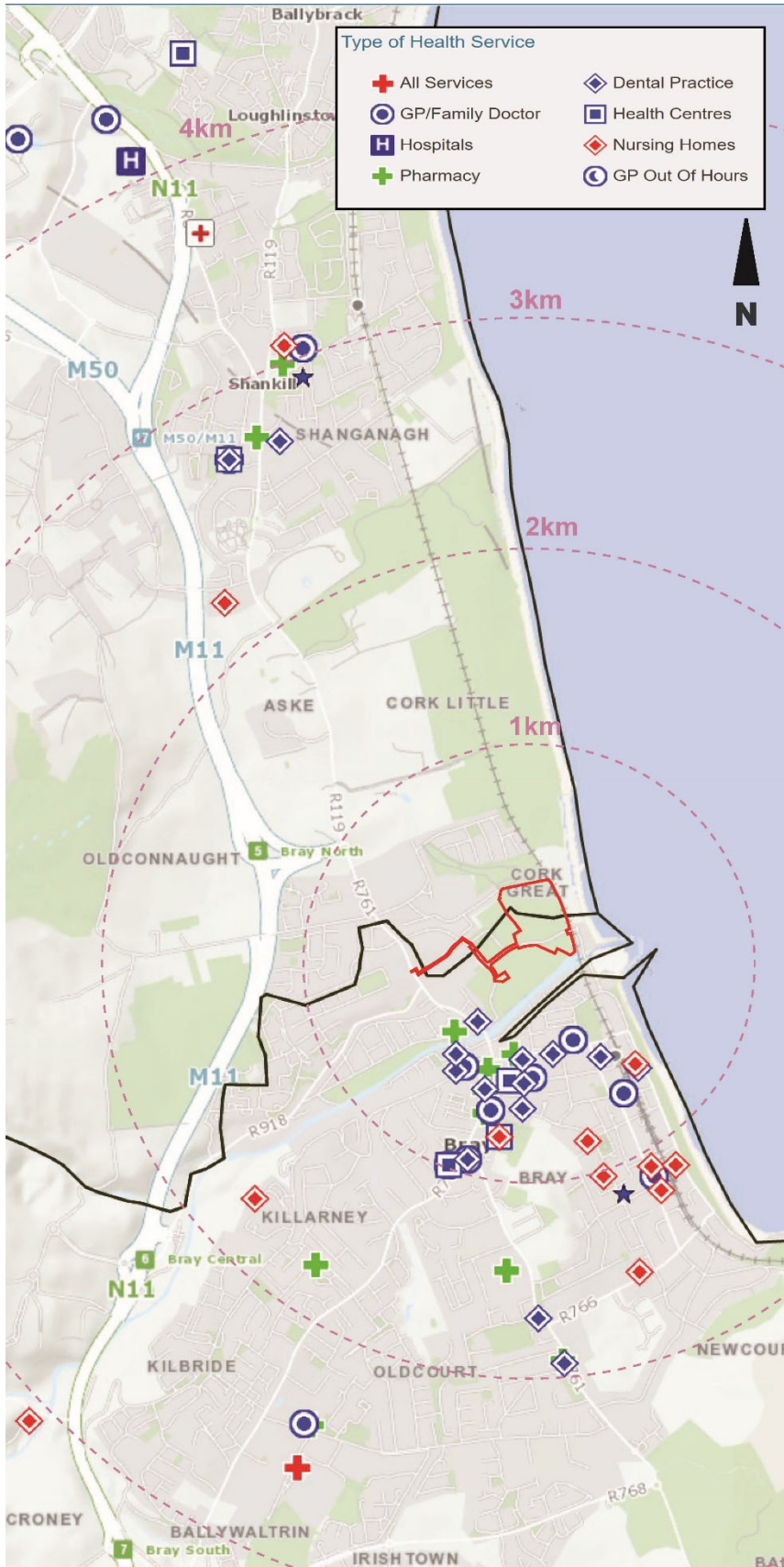


Figure 6-2: Healthcare Provision

Source:DOH/RPS

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The Inspector's Report (**ABP Ref. 311181-21**) concluded with regard to a proposed development of 586no. units at the subject site:

"I consider the level of services and amenities on offer in Bray, including in relation to healthcare, is adequate to meet the needs of additional population at this location"

6.7.3 Childcare Facility

A *Childcare Demand Analysis* has been prepared by RPS and is enclosed as part of the application package. The assessment highlights the relevant planning policies and objectives relating to the provision of childcare facilities as outlined in policy documents. The assessment also outlines current childcare provision and demand for such facilities. In response to this assessment, the proposed development includes a childcare facility on the ground floor of Block C, with an associated outdoor play area, car parking for staff and set down area at surface level.

Considering existing and permitted childcare facilities in the study area, population demographics, relevant policy and guidelines, it is concluded that a childcare facility with a mid-point between the maximum and minimum estimate providing 88 no. childcare places will exceed the demand generated by the proposed development. Based on this analysis, the proposed facility has ample space to cater for this level of childcare likely to be generated by the Coastal Quarter and also cater for further phases of the *Harbour Point Masterplan*.

The Inspector's Report (**ABP Ref. 311181-21**) concluded with regard to a proposed development of 586 no. units and providing 88 no. childcare spaces at the subject site that *"I consider the scale of the facility as proposed is acceptable."*

6.7.4 Other Uses

Further details in relation to this development are provided in the architectural drawings prepared by Glenn Howells Architects and are submitted as part of the application. These drawings detail other proposed uses, including:

- Childcare facility (627 sqm);
- Café (195 sqm);
- Retail unit (249 sqm); and
- 1 no. commercial unit, incorporating a gym and juice bar (512 sqm).

6.8 Car Parking

There is a general presumption across all levels of public policy in favour of active travel and sustainable modes of transport. With specific reference to car parking the primary policy document of relevance is *Sustainable Urban Housing - Design Standards for New Apartments*. This provides guidance on car parking provision, which is modulated depending on the location:

- Central and/or Accessible Urban Locations: Car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances
- Intermediate Urban Locations: a reduced overall car parking standard.
- Peripheral and/or Less Accessible Urban Locations: one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.

The subject site is located within a designated 'Key Town' with a wide range of local services and amenities including, schools, retail, dining and leisure facilities. The development site is considered to be an intermediate urban location with many of the characteristics of a central location. As such the quantum of car parking to be provided should be significantly reduced.

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With respect to residential development the DLRCDP development management standards for car parking within parking zone 2 (within which the site falls) provides:

- Houses
 - 1 no. space per 1-bed units and per 2-bed unit
 - 2 no spaces per 3-bed unit
- Apartments
 - 1 space per 1-2 bed unit
 - 2 spaces per 3-bed unit+

Within section 12.4.5 of the DLRCDP it is stated:

“In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 or may consider that no parking spaces are required.”

Criteria are set out, guiding the acceptability of a deviation from the standards. Such criteria include:

- Proximity to public transport services and level of service and interchange available;
- The range of services available within the area;
- Walking and cycling accessibility/permeability and any improvement to same;
- Urban design, regeneration and civic benefits including street vibrancy; and
- Robustness of Mobility Management Plan to support the development.

The WCDP provides: *“2 off street car parking spaces shall normally be required for all dwelling units over 2-bedrooms in size. For every 5 residential units provided with only 1 space, 1 visitor space shall be provided.”*

The Draft WCDP provides under objective CPO 12.57:

“New / expanded developments shall be accompanied by appropriate car parking provision.....with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 7.3 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.”

The subject location is served by high capacity public transport services including DART and bus services and car parking provision can be controlled and managed. The relevant maximum uses and standards as per Table 7.3 are:

- *Dwelling 1-2 bedrooms – 1.2 per unit*
- *Dwelling 3-4 bedrooms – 2 per unit*
- *Childcare facilities – 0.5 spaces per staff member + 1 car parking space per 10 children.*
- *Other Retail – 4 per 100 m2 gross floor area*
- *Restaurant dining room – 10 per 100 m2 gross floor area*

It is considered that the application of maximum and standard County Development Plan standards in the particular case and context of Coastal Quarter would diminish the quality of the urban design, fail to adequately support active travel modes and be contrary to overarching and specific national policy pertaining to transport and car parking. It is therefore proposed to provide residential car parking as per the standards below:

- 1 no. resident space for 2-bedroom units (House / Duplex)
- 1.5 no. resident spaces for 3-bedroom units (House / Duplex)
- 2 no. resident spaces for 4-bedroom units (House / Duplex)

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- 1 no. visitor space per 10 no. units (House / Duplex)
- 0.6 – 0.72 no. space per average resident space for apartment units (Apt); and
- 1 no. visitor space per 20 no. units (Apt).

It is proposed to provide:

- 299 no. apartment resident parking spaces and 23 no. visitor parking spaces.
- 179 no. unit resident house / duplex parking spaces and 13 no. visitor parking spaces.

In addition 2 no. share spaces are proposed.

The proposed quantum of parking is considered to be in accordance with national policies and guidelines which allow for lower levels of car parking in appropriate locations. Having regard to the particular contextual circumstances of the subject site, it is considered that the proposed parking is appropriate and in accordance with national policy and guidance (see also **Section 7** of this Report). The proposed car parking provision shall:

- Promote active travel modes;
- Facilitate an urban design of high quality;
- Facilitate an appropriate density of development; and
- Accord with overarching and specific national policy pertaining to transport and car parking.

An analysis of car parking provision is enclosed as part of the application documentation within the *Traffic Transport Assessment* prepared by Atkins. A *Mobility Management Plan* for the proposed development is included in the planning application and the implementation of the measures therein shall further reduce private car based travel and car parking demand.

It should be noted that the proposed quantum of car parking is in accordance with that which was recommended in the Inspector's Report (**ABP Ref. 311181-21**) which concluded with regard to a proposed development of 591 no. units and similar non-residential uses to the current application, that:

“the proposed car parking provision is considered acceptable at this location with regard to this policy guidance, particularly given the proximity of pedestrian and cycle infrastructure, proposed connections into existing infrastructure, and the location of the development with a range of services and facilities within walking distance.”

6.8.1 Non-Residential Uses Car Parking

The non-residential uses will be accommodated with 26 no. spaces to be located in a combination of Block B and Surface parking spaces around Block C. A total of 2 no. dedicated set-down spaces will be provided on street adjacent the Creche with the adjacent visitor spaces utilised to allow for the remaining 2 no. set-down spaces. This will allow for a dual use of parking spaces throughout the day, avoiding an over provision of parking.

The non-residential car parking proposals omit previously proposed car parking at “the Orchard”, thereby according with Condition 4 (d) attached to the permission granted under **ABP Ref. 311181-21** which stated “*Car parking spaces at ‘The Orchard’ car park shall be omitted and in its place an area of open space shall be delivered, with design and boundary details to be agreed, and access maintained for maintenance vehicles servicing the wastewater infrastructure*”.

6.9 Open Space

The landscape design approach for the Coastal Quarter site is to create a high-quality setting for the proposed development which reflects its prominent location on the Bray waterfront and banks of the River Dargle while maintaining the open character of the previous land use. This will be achieved through the creation of a series of new meaningful public open spaces with varying uses for residents and visitors. The locations of the public open space and the communal space is shown in **Figure 6-3**. These spaces will be connected by pedestrian and cyclist links that will permeate through the subject site and open up new connections to neighbouring areas. Play areas for a range of age groups will be provided throughout the development, with high quality play equipment, seating and other street furniture.



Figure 6-3: Proposed Public Open Area and Communal Space

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The total proposed public open spaces comprise 13,465 sq.m. It is also noted that c.5,630 sq.m of open space is located within that part of the site under the 'F' zoning objective which is not included in these figures.

In addition, there are 8,190 sq.m of communal areas. **Figure 6-3** illustrates the location of these spaces.

Section 12.8.3.1 of the DLRCDP states that 15% of the overall site area for all residential developments shall be required to be reserved for use as Public Open Space.

The site within DLRC is 3.65 hectares however only 30,862sq.m of the site is developable with regard to the 'F' zoning objective therefore 4,629 sq.m of public open space is required. A total of 5,008 sq.m (or 16.4%) of open space is provided. The proposed development comfortably meets the requirement that 15% of the overall site area for all residential developments shall be required to be reserved for use as Public Open, particularly when it is considered that this does not include the c. 5,630 sq.m of open space located within that part of the site under the 'F' zoning objective.

The DLRCDP also requires communal open space of one bed 5 sqm, two bedrooms (3 bed) 6 sqm, two bedrooms (4 bed) 7sqm, three bedrooms 9 sqm and four + bedroom 12 sqm.

In this regard, the communal open space requirement for the proposed apartment and duplex development within DLRC is calculated in **Table 6-1**:

Table 6-1: Communal Open Space DLRCDP Requirements

| Calculations | | | |
|-------------------------|------------------------------|--------------|---------------------------------|
| Unit Type | Communal Open Space Standard | No. of Units | Communal Open Space Requirement |
| One bed | 5 sqm | 99 | 495 |
| Two bedrooms (3 person) | 6 sqm | 0 | 0 |
| Two bedrooms (4 person) | 7 sqm | 99 | 693 |
| Three bedrooms | 9 sqm | 24 | 216 |
| Total | | | 1,404 |

Source: Architect's Schedules

Communal amenity areas within DLRC comprise 2,440sqm at Blocks A and D. This exceeds that required by the application of the DLRC as shown in **Table 6-1**. In practice communal open space for the DLRC duplex units is provided within Area H which lies within the area of WCC.

Appendix 1 of the WCDP requires that: *"Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made"*. This same requirement is included in the Draft WCDP.

The extent of developable site area within WCC is 4.19 hectares and therefore 6,290 sq.m are required. A total of 8,457 sq.m of open space is provided within the WCC area zoned for residential development, comfortably exceeding that which is required by WCDP.

The Bray LAP sets out specific policy guidance in relation to the former Bray Golf Club lands. Objective BT2 is:

"To promote and support the development of significant new retail, retail services, commercial and cultural / community floorspace in Bray, at the following locations: - the 'Florentine Centre'(see Objectives for 'Opportunity Site 1' to follow) - Former Bray golf club lands (see Objectives for SLO 3)"

SLO 3 includes the following objectives:

"Not less than 2ha shall be developed as public open space;

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Any application shall include a detailed phasing programme that ensures the timely delivery of all elements of the SLO. In order to 'kick start' the development, a first phase of housing, being those units that are not integrated into the mixed use retail / commercial element, in conjunction with the public park, may be developed as a 'Phase 1' of the overall development, strictly on the basis of the remaining housing being delivered in tandem with the retail / commercial element."

The proposed development provides a considerable area of public open space as part of the first phase of the development of the Masterplan lands and is considered to accord with the intent of SLO 3. However, it is not clear if SLO 3 requires the provision of a 2 ha public park, neither is it clear if there is a phasing requirement associated with the delivery of the park. This is considered further in the Statement of Material Contravention.

The Draft WCDP requires that communal amenity space be provided in accordance Design Standards for new Apartments. In this regard, the communal open space requirement for the proposed apartment / duplex development within WCC is calculated in **Table 6-2**:

Table 6-2: Communal Open Space WCC CDP Requirements

| Calculations | | | |
|-------------------------|------------------------------|--------------|---------------------------------|
| Unit Type | Communal Open Space Standard | No. of Units | Communal Open Space Requirement |
| One bed | 5 sqm | 139 | 695 |
| Two bedrooms (3 person) | 6 sqm | 3 | 18 |
| Two bedrooms (4 person) | 7 sqm | 123 | 861 |
| Three bedrooms | 9 sqm | 23 | 207 |
| Total | | | 1,781 |

A summary of the open space provided is set out in **Table 6-3**.

Table 6-3: Required and Proposed Open Spaces

| Type | | sq.m |
|---|-------|---------------|
| DLRCC Developable Site Area (excluding 'F' Zoning) | | 30,862 |
| WCC Developable Site Area | | 41,934 |
| OPEN SPACE REQUIRED | | |
| 15% of DLRCC Developable Site Area (excluding 'F' Zoning) | | 4,629 |
| 15% of WCC Developable Site Area | | 6,290 |
| Total | | 10,919 |
| OPEN SPACE PROPOSED | | |
| Proposed Open Space within DLRCC | 5,008 | |
| Proposed Open Space within WCC | 8,457 | |
| Total | | 13,465 |
| COMMUNAL OPEN SPACE REQUIRED (Apt & Duplex) | | |
| Within DLRCC | 1,404 | |

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| Type | | sq.m |
|---|-------|--------|
| Within WCC | 1,781 | |
| Total | | 3,185 |
| COMMUNAL OPEN SPACE PROPOSED | | |
| Within DLRCC | 2,440 | |
| Within WCC | 5,750 | |
| Total | | 8,190 |
| SUMMARY | | |
| Total Open and Communal Space Required | | 14,104 |
| Total Open and Communal Space Proposed* | | 21,655 |

*Excludes 'F' Zoned Lands 5,630 sq.m and includes Orchard Communal Amenity Area 3,083 sq.m

Source: Architect's Schedules

The proposed landscaping plans for the public open space and amenity area are detailed in the *Landscape Design Report* and associated drawings prepared by Park Hood Landscape Architects that accompany the application package.

6.10 Reason for Split Decision ABP 311181-21

As set out in Section 3.1 of this report there has been a recent SHD application (ABP 311181-21) at the subject site. A split decision was issued which:

- Refused permission for proposed Block A and Block B
- Granted permission for the remainder of the development as proposed.

The proposed Blocks A and B are considerably changed from those proposed under ABP Ref. 311181-21, in order to address fully the concerns as articulated in the decision of the Board. The revised design approach adopted in this current application and the rationale for same, given its particular site context, is set out in terms of building height and design scale and mass in Sections 6.2 and 6.3 of this report and the enclosed *Architectural Design Statement* by GHA.

The *Architectural Design Statement* considers Blocks A and B as an integral element of the overall site development and also addresses the suitability of the overall design response given its coastal location.

7 PLANNING POLICY AND GUIDANCE – STATEMENT OF CONSISTENCY

7.1 Introduction

Section 4 of the Act of 2016 outlines the requirements relating to making an application for permission for Strategic Housing Development. It provides that such an application shall be so made only where the applicant has fulfilled the requirements set out in section 8. Section 8(1)(iv)(l) provides that the application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan.

In accordance with section 8(1)(iv)(l), this section illustrates how the proposed development will be consistent with the policies and objectives set out in the DLRCDP, WCDP and the Bray LAP.

This section also sets out how the proposed development will be consistent with other planning policy documents and guidelines, as appropriate.

In this regard **Section 7** provides a **Statement of Consistency**.

In instances where in the prospective applicant's opinion the proposed strategic housing development would, or could be deemed to, materially contravene the DLRCDP, WCDP, Draft WCDP or the Bray MD LAP, a statement is provided indicating why permission should nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000. This is provided in a separate report, *Statement of Material Contravention* prepared by RPS and enclosed as part of the application documentation.

The Irish Planning System and policy hierarchy is outlined schematically in **Figure 7-1**.

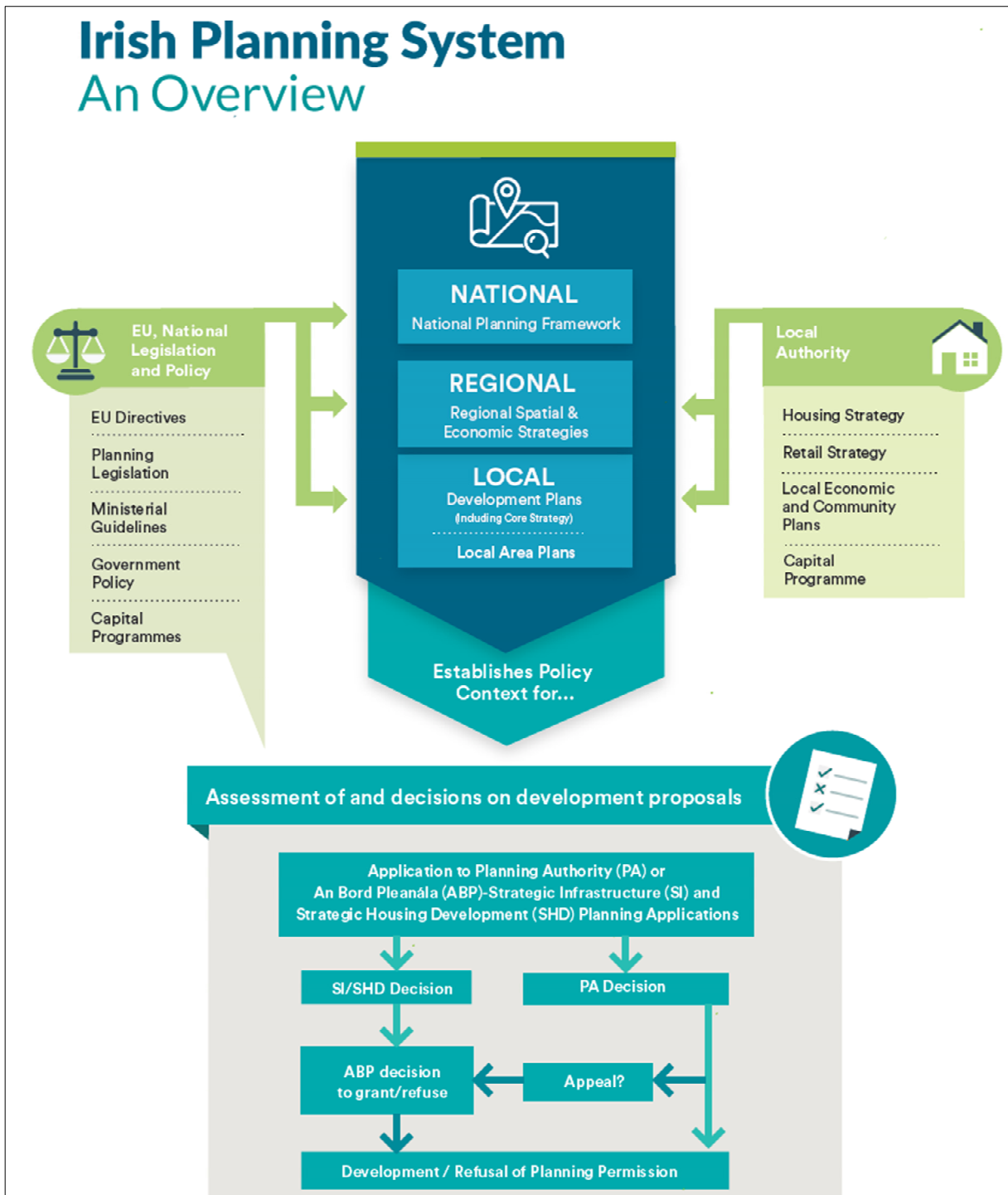


Figure 7-1: Irish Planning Hierarchy

Source: Project Ireland 2040 – National Planning Framework

The key policy documents of relevance to the proposed development are as follows:

- National
 - Project Ireland 2040 – National Planning Framework (2018);
 - Rebuilding Ireland – Action Plan for Housing and Homelessness (2016);
 - Delivering Homes, Sustaining Communities (2008) / Quality Housing for Sustainable Communities (2008);

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- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- Urban Design Manual – A Best Practice Guide (2009);
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020);
- Urban Development and Building Heights (2019);
- Childcare Facilities – Guidelines for Planning Authorities (2001);
- Design Manual for Urban Roads and Streets (2013);
- Part V of the Planning and Development Act 2000: Guidelines (2017).
- The Planning System and Flood Risk Management (2009).
- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009); and
- Regional
 - Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly 2019–2035;
 - Greater Dublin Area Transport Strategy (2016-2035);
 - Draft Greater Dublin Area Transport Strategy (2022-2042); and
 - Greater Dublin Area Cycle Network Plan (2013);
- Local
 - Dún Laoghaire-Rathdown County Development Plan 2022-2028;
 - Wicklow County Development Plan 2016–2022;
 - Draft Wicklow County Development Plan 2022–2028
 - Bray Municipal District Local Area Plan 2018 – 2024; and
 - Bray and Environs Transport Study (2019).

The key provisions of national and regional planning policy as they relate to the proposed development are set out in the following sections.

7.2 National Level

7.2.1 Project Ireland 2040 National Planning Framework (2018)

Project Ireland 2040 is the government’s long-term overarching development strategy for the state. The plan seeks to align investment in public infrastructure with a well-thought-out and defined development strategy. The *National Development Plan* (NDP) and the *National Planning Framework* (NPF) combine to form *Project Ireland 2040*. The NPF sets the vision and strategy for the development to 2040 and the NDP provides enabling investment to implement the strategy.

The NPF is the primary articulation of spatial, planning and land use policy within Ireland up to 2040. The NPF aims to avoid urban sprawl by promoting increased residential densities in urban areas, consequently reducing pressure on infrastructure demands and adverse impacts on the environment. In this regard the preferred approach to planning the future spatial strategy is promoting compact development that focuses on reusing previously developed, ‘brownfield’ land, building up infill sites, which may not have been built on before, and either reusing or redeveloping existing sites and buildings.

National Policy Objective 33 of the NPF states that it is a national policy to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*”. The NPF expands on this objective, explaining that the future homes of Ireland will be built in locations that support sustainable development such as cities and larger towns with provision of infrastructure, access to services and can be delivered in an efficient and appropriate way.

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National Policy Objective 4 of the NPF aims to “ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”.

A number of “key enablers” for the growth of Dublin are identified in the NPF which are supportive of the subject development including:

- Development of an improved bus-based system; and
- Progressing housing development on public transport corridors.

The consistency of the proposed development with the NPF is outlined in **Table 7-1**.

Table 7-1: NPF Consistency Appraisal

| National Planning Framework | | |
|-----------------------------|--|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Objective 1b | Additional 490,000 – 540,000 in Eastern and Midland Region by 2040. | The proposed development comprises 586 no. residential units providing new homes. |
| Objective 2a | A target of half 50% of future population and employment growth will be focused in the existing five Cities and their suburbs | The proposed development comprising 586 no. residential units is located within the Dublin Metropolitan Area. |
| Objective 3b | Deliver at least half of all new homes in the five Cities | The proposed development comprising 586 no. residential units is located within the Dublin Metropolitan Area. |
| Objective 4 | Quality of design and integration | The proposed development is located within the urban fabric of Bray and enjoys multiple vehicular, pedestrian and cycle connections with the town. The quality of design is detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects which notes the proposed development is planned to merge respectfully with the existing built form of Bray town with a comparable scale and urban grain. |
| Objective 5 | Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity | The proposed development will provide for significant population growth within Bray, a town with a population of c. 32,600. The proposed design and layout are of a high quality and the location is within the town, close to the waterfront. The proposed development enhances the attractiveness of Bray as a place to live and for inward investment. |
| Objective 11 | There is a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages | The proposed development will provide 586 no. residential units within an existing large town which is designated a “key town” in the <i>Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly 2019 – 2035</i> . |
| Objective 27 | Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages. | The subject site is located within Bray town. All the facilities of the town may be accessed on foot or by bicycle from the subject site. High capacity public transport services at Bray Daly railway station are within c. 800m of the site. Pedestrian/ cycle routes are being provided within the site and will facilitate linkages to Corke Abbey Valley Park, the waterfront and the town as part of the proposed development. The proposed layout has been informed by the planned LUAS Green line extension and the public transport bridge which lie adjacent and south of the subject site. |

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| National Planning Framework | | |
|-----------------------------|---|--|
| Objective 31 | Prioritise the alignment of targeted and planned population and employment growth with investment in: The provision of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations; | The proposed development is located within the urban fabric of Bray and adjacent to recently constructed secondary and primary schools. There are extensive childcare facilities within the Bray area as presented in the <i>Childcare Demand Analysis</i> prepared by RPS and submitted within the application. A childcare facility is proposed as part of the development. Significant growth is planned for Bray in local and regional planning policy and the town is designated a “key town” in the <i>Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly 2019 – 2035</i> . |
| Objective 33 | Prioritise the provision of new homes at locations that can support sustainable development | The proposed development represents the redevelopment of site within an urban development. The masterplan for the overall site seeks to ensure that the proposed development integrates seamlessly within the existing settlement and supports, and is supported by, existing local facilities and transport connections. The proposed development is located within an existing large town which is served by existing (DART, Commuter Rail and Intercity Rail) and further high capacity public transport (LUAS and Bus Connects) are planned. The proposed development is also well located with respect to pedestrian and cycle access. Linkages to the movement network and the surrounding area are provided as part of the proposed site layout. The mix of house types and units sizes proposed provides for the sustainable growth of Bray. |
| Objective 35 | Increase residential density in settlements, through a range of measures including infill development schemes | The proposed development is located within Bray and will infill a former golf course located within c. 800m of the Bray Daly railway station. The proposed development has a density of 80 uph (net) and is considered appropriate for this location. |

7.2.2 Housing for All – A new Housing Plan for Ireland, 2021

Housing for All – A new Housing Plan for Ireland is the government’s housing plan to 2030. It is a multi-annual, multi-billion euro plan which will improve Ireland’s housing system and deliver more homes of all types for people with different housing needs. The overall aim of our new housing plan for Ireland is that:

“Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.”

Housing for All is set around five “pathways”:

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply;
- Addressing Vacancy and Efficient Use of Existing Stock;
- Enabling a Sustainable Housing System; and
- Establish a Commission on Housing.

A number of the objectives arising from these overarching pathways are pertinent to the subject development. The consistency of the proposed development with the NPF is outlined in **Table 7-2**.

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Table 7-2: Housing for All - Consistency Appraisal

| Rebuilding Ireland | | |
|--|---|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Enable Homeownership and Increasing Affordability | Increased supply of new housing, up to an average of at least 33,000 per year to 2030 | The proposed development consists of 586 no. residential units. |
| Enable Homeownership and Increasing Affordability 1.8 | Increased contribution by developers under Part V, up from 10% to 20%, to include affordable housing and cost rental housing. | In accordance with section 96 of the Planning Development Acts 2000 a total of 62 no. units will be transferred to Dún Laoghaire-Rathdown or Wicklow County Council for social housing. Part V drawings have been prepared by Glenn Howells Architect identifying the location of the units and are enclosed. These proposals are agreed in principle with both Planning Authorities. |
| Increase Social Housing Delivery 4.1 | Deliver over 10,000 social housing homes each year to 2030 and increase the stock of available social housing. | In accordance with section 96 of the Planning Development Acts 2000 a total of 62 no. units will be transferred to Dún Laoghaire-Rathdown or Wicklow County Council for social housing. Part V drawings have been prepared by Glenn Howells Architect identifying the location of the units and are enclosed. These proposals are agreed in principle with both Planning Authorities. |
| Drive environmental sustainability in our housing stock 21.1 | Continue a joint approach in respect of the Design Manual for Urban Roads and Streets (DMURS), to ensure more widespread and consistent implementation. | The proposed development has been designed in accordance with the DMURS. Atkins Engineers have undertaken a separate appraisal of the proposed development and its conformity with the DMURS which is enclosed. |
| Drive environmental sustainability in our housing stock 21.5 | Construct an average of 33,000 nZEB homes each year to 2030. | The proposed buildings will be constructed to achieve NZEB standards. |

7.2.3 Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland – Action Plan for Housing and Homelessness (Rebuilding Ireland) was launched in 2016 with the overarching goal to accelerate the delivery of housing from its current under-supply across all tenures. Rebuilding Ireland aims to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation. The plan seeks to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing over its period (2017-2021), while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.

Rebuilding Ireland is set around five pillars of proposed actions; Pillar 1 to address homelessness; Pillar 2 to accelerate social housing; Pillar 3 to build more homes; Pillar 4 to improve the rental sector; and Pillar 5 to utilise existing housing.

The delivery of housing in the right place is also recognised as being of crucial importance within Rebuilding Ireland. Locating housing in the right place provides for access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.

The consistency of the proposed development with Rebuilding Ireland is outlined in **Table 7-3**.

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Table 7-3: Rebuilding Ireland Consistency Appraisal

| Rebuilding Ireland | | |
|--------------------|--|--|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Pillar 1 | Address homelessness | The proposed development will increase housing supply and directly addresses homelessness. |
| Pillar 2 | Accelerate social housing | Proposed development will provide for the transferral of housing units to persons nominated by WCC and DLRCC. A total number of 62 no. units will be transferred to the DLRCC and WCC for social housing as illustrated in the application drawings. These proposals are agreed in principle with both Planning Authorities, evidence of which is presented in this application. |
| Pillar 3 | Build more homes | The proposed development comprises 586 no. residential units. |
| Pillar 4 | Improve rental sector | The proposed development incorporates a Build to Rent element (Block A) which will deliver a definite 162 No. units to the rental sector. The rest of the development (other than Part V) will increase housing supply in general which will also impact on rental supply. |
| Pillar 5 | Utilise existing housing | The proposed development will not hinder utilisation of existing housing. |

7.2.4 Delivering Homes, Sustaining Communities (2007) / Quality Housing for Sustainable Communities (2007)

Delivering Homes, Sustaining Communities – Statement on Housing Policy sets out the fundamentals of the Governments vision for housing. According to this document, the core objective of housing policy in Ireland is to “enable every household to have available an affordable dwelling of good quality, suited to its needs, in a good environment and, as far as possible, at the tenure of its choice”. The document states that housing policy must reflect the needs of the growing population and diversity within Ireland, focusing on the following range of actions:

- “Building sustainable communities;
- Responding to housing need in a way that maximises choice and responsibility; and
- Effectively delivering accommodation programmes”.

According to the document, the vision for the future “is not limited to the physical aspects, - the ‘bricks and mortar’, - but is more firmly grounded in the concept of community development and the quality of services that individuals and families should expect”. The document seeks to deliver sustainable neighbours that optimise the use of suitable land to deliver high quality developments that offer a variety of housing types and integration with other infrastructure requirements.

The statement on housing policy is accompanied by *Quality Housing for Sustainable Communities* (the Design Guidelines). These are intended to assist in the implementation of the policies and objectives and focus on:

- “Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;
- Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;
- Pointing the way to cost effective options for housing design that go beyond minimum codes and standards;
- Promoting higher standards of environmental performance and durability in housing construction;

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- *Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *Providing homes and communities that may be easily managed and maintained”.*

The Design Guidelines state that good quality housing developments should be socially and environmentally appropriate; architecturally appropriate; accessible and adaptable; safe, secure and healthy; affordable; durable; and resource efficient.

It is considered that all these essential requirements have been incorporated into the design and layout of the proposed development, which has been designed to achieve high levels of amenity and meet all relevant buildings standards. In many cases, minimum standards are exceeded to ensure a high quality residential scheme. The consistency of the proposed development with these policy documents is outlined in **Table 7-4**.

Table 7-4: Delivering Homes, Sustaining Communities / Quality Housing for Sustainable Communities Consistency Appraisal

| Delivering Homes, Sustaining Communities / Quality Housing for Sustainable Communities | | |
|---|---|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| 1.0 Site Selection | <p><i>“strengthening the fabric of urban centres”</i></p> <p><i>“locating people where services are available”</i></p> | <p>The very basis of national policy is to promote more compact forms of development which focus on reusing previously developed, ‘brownfield’ land, building up infill sites which may not have been built on before, and, either reusing or redeveloping existing sites and buildings. The proposed development is located within the central area of Bray and is within walking distance of all town functions and existing public transport services including bus services along Castle Street/Dublin Road and DART services at Daly railway station. The proposed development will deliver 586 no. new homes to the town centre which will contribute to the reinvigoration of existing town centre uses. This development together with further planned public transport initiatives will act as a catalyst for renewal of other underutilised sites.</p> |
| 3.1) Urban Design Objectives in the Provision of Housing | <p><i>“A key aim of urban design is to deliver sustainable communities through the creation of a high quality built environment, by reducing, as far as possible, the necessity to travel, particularly by private car for the purposes of employment, education and recreation and to avail of services and amenities necessary for living”.</i></p> | <p>The subject site is well located with regard to employment areas, educational and recreational facilities and public transport. All facilities within Bray are accessible on foot / by bicycle and the site is served by DART and bus services.</p> <p>Street typology and green links will be aligned with public parks, plazas and open spaces to create a strong urban layout that ensures visual permeability through the site to create a highly legible network of pedestrian and cyclist routes. The proposed pedestrian / cycle routes will tie in with a wider network of routes within the <i>Harbour Point Masterplan</i> prepared by Glenn Howells Architects and submitted with this application. The geometry of roads within the proposed scheme caters for all forms of movement, the layout of the proposed has been designed to favour walking, cycling and public transport. Further details are provided in the <i>Engineering Planning Report</i> prepared by Atkins.</p> |
| 3.2) Designing in Context | <p><i>“Context is the location, character and setting of the area within which a proposed project will sit. It includes the forms of existing settlements, buildings and spaces as well as the ecology and archaeology of the area and the circulation routes that pass through the</i></p> | <p>The proposed development ensures the character and context of the site is protected. As noted in the <i>Harbour Point Masterplan</i> and the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects, the proposed development is planned to</p> |

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| Delivering Homes, Sustaining Communities / Quality Housing for Sustainable Communities | | |
|---|---|---|
| | <p><i>area. It encompasses the natural as well as human history of the locale. The process of designing in context should aim to create high quality places in which people can live happy and productive lives.”</i></p> | <p>merge respectfully with the existing built form of Bray town with a comparable scale and urban grain. The proposed development has been designed with consideration for the existing character and landscape setting of Harbour Point and its coastal setting and preserves, where possible, existing, healthy, mature trees, hedgerows and other landscape features.</p> |
| 3.3) The Urban Framework | <p>The Urban Framework provides the basis for detailed design of the various constituent elements. These include the:</p> <ul style="list-style-type: none"> - Movement Network - Diversity and Mixing Issues - Hierarchy of Spatial Development - Density - Public Open Space and Landscape Design | <p>The proposed development provides a high standard of living spaces with a design and layout which is respectful of and integrated with the existing community.</p> <ul style="list-style-type: none"> - The subject site is well connected to public amenities and public transport as noted above. - The proposed development includes a mix of dwelling sizes including 239 no. 1-bed units, 237 no. 2-bed units, 98 no. 3-bed units and 12 no. 4-bed units. - The proposed development includes 458 no. apartments, 76 no. houses and 52 no. duplexes. - The proposed development provides a sustainable net density of 80 uph. This density is appropriate for the location of the site within the Dublin Metropolitan Area and in close proximity to public transport services - Changes in lifestyle and working arrangements have resulted in recreational and amenity uses becoming an important town centre function. - A total of 13,465 sq.m (excluding ‘F’ land use zoning) of the subject site will provide a variety of public open spaces including, new public plazas, parks, play facilities and new public cycle and pedestrian links. Play areas for a range of age groups will be provided with high quality play equipment and street furniture. In addition, 8,190 sq.m of communal gardens will also be provided which includes the provision of a Multi Use Games Area (MUGA). |
| 3.4) Detailing the Place | <p>Aspects to be considered in relation to place making include:</p> <ul style="list-style-type: none"> - Making open space - Creating edges - Building size and scale - Enhancing the Public Realm - Making safe places <p>Negative left-over spaces that have no function or character should be avoided</p> | <p>The size and scale of the proposed development carefully considers the surrounding area with particular attention given to boundary treatments, entrances and transitions in terms of height and massing. The proposed buildings will enclose or frame new public open spaces ranging from larger parks and public plazas (Market Square) to smaller pocket parks and linear green links. Play zones and a MUGA are also proposed.</p> <p>The development will provide a high quality public space (Market Square) adjacent to the planned LUAS line.</p> <p>High levels of passive surveillance over public spaces will be provided by proposed buildings and communal and private open spaces will be clearly distinguishable through the provision of gates and landscaping.</p> |
| 4.0 Scheme Layout and Design | <p><i>“Factors to be addressed include:</i></p> | <p>The size and scale of the proposed development carefully considers the existing town of Bray and is planned to merge respectfully with the existing built form with a comparable scale and urban grain.</p> |

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| <p><i>the positive contribution that it makes to the overall environment of the locality, e.g., by integrating new housing into the existing natural and built environment in a way that contributes to the social, environmental and economic sustainability of the area.”</i></p> <p><i>“To avoid the monotony frequently associated with developments restricted to a single dwelling type or building height, consideration should be given to varying the heights of buildings, having regard to the objectives of the Development Plan for the area”</i></p> <p><i>“In the case of social housing the mix of dwelling types should be based primarily on the results of the most recent assessment of housing need and the characteristics of households likely to be accommodated in the scheme”</i></p> <p><i>“Ensuring informal surveillance by putting ‘eyes on the street’, i.e. making buildings face the public realm and minimising exposed blank facades, avoiding blank walls and facades and maximising front door entrances”</i></p> | <p>The development will be well integrated into the surrounding area by providing new entrances and pedestrian and cycle links through the site to achieve a high level of permeability including northward to Corke Abbey Valley Park and eastward and southward via the DART underpass.</p> <p>The proposed development will provide a range of building heights and typologies – ranging from 2-3 storey houses/duplex units to apartment blocks from 4 up to 12 storeys in the south-east corner (part of Block B). The proposed development will also provide a mix of dwelling sizes including 1, 2, 3 and 4-bed units. The <i>Architectural Design Statement</i> and <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects provides details with respect to the detail considerations of the proposed development form and layout. The <i>Housing and Tenure Types and Unit Mix Report</i> prepared by RPS enclosed as part of the application provides details on the house types and unit mix.</p> <p>In accordance with Section 96, Part V of the Planning and Development Acts 2000 a total number of 62 no. units will be transferred to the DLRCC and WCC for social housing. Part V drawings prepared by Glenn Howells Architects identifies the location of these units and is enclosed.</p> <p>High levels of passive surveillance over public spaces, will be provided by proposed buildings, with entrances located to the front to provide active use of adjoining open space. This measure has informed and is integral to the design and orientation of the proposed development. The <i>Architectural Design Statement</i> prepared by Glenn Howells Architects provides the rationale and details with respect to material and finishes and the overall design intent.</p> |
| <p>5.0 Dwelling Design</p> | <p><i>“The primary design aim should be to create visually attractive dwellings that will provide appropriate accommodation and good quality living environments for prospective occupants. Dwellings should be suited to the needs of the occupants and be designed to have reasonable levels of cost-in-use over their full lifetime with regard maintenance.”</i></p> |

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| Delivering Homes, Sustaining Communities / Quality Housing for Sustainable Communities | | | | | | |
|--|--|------------------|-----------------------|------------------------|--|---------|
| 5.3.2 | Table 5.1 sets out Space provision and room sizes for typical dwellings including: | | | | As detailed in the HQA prepared by Glenn Howells Architects these standards have been met. | |
| | Dwelling Type | Main Living Room | Aggregate Living Area | Aggregate Bedroom Area | | Storage |
| | 1 bed apt | 11 | 23 | 11 | | 3 |
| | 2 bed 3p apt | 13 | 28 | 20 | | 5 |
| | 2 bed 4p apt | 13 | 30 | 25 | | 7 |
| | 2 bed 4p hse | 13 | 30 | 25 | | 4 |
| | 3 bed 5p hse | 13 | 34 | 32 | | 5 |
| | 3 bed 7p hse | 15 | 40 | 43 | | 6 |

7.2.5 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The role of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (the Residential Development Guidelines) is to ensure the sustainable delivery of new development throughout the country. It focuses on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one’s way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
- Provide a mix of land uses to minimise transport demand.

The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. They recommend that planning authorities should promote high quality design in their policy documents and in their development management process.

On 21st April 2021 a Circular Letter (Ref. NRUP 02/2021) was issued by the Department of Housing, Local Government and Heritage to provide clarity in relation to the interpretation and application of the current statutory guidelines in the context of, “*the need for significantly increased and more sustainable housing supply throughout Ireland*”. The letter emphasises the need for a graduate and tailored approach to the assessment of residential density.

The consistency of the proposed development with the Residential Development Guidelines is outlined in **Table 7-5**.

Table 7-5: Sustainable Residential Development in Urban Areas Consistency

| Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas | | |
|--|---|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Residential Density | Land use planning should underpin the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors. Minimum net densities of 50 dwellings per hectare, subject to appropriate design and | The proposed development is within walking distance of existing bus services along Castle Street/Dublin Road and is located within c. 800m of the existing DART, commuter and intercity railway station in Bray. The lands are also directly adjacent to the planned LUAS Green Line extension to Bray. The planned Bray to Dublin City Bus Connects Corridor routes along the R761 approximately 550m to the west of the subject site. The subject site is or shall be linked by direct and dedicated pedestrian and cycle routes to these |

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| Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas | | |
|--|---|---|
| | amenity standards, should be applied within public transport corridors. | public transport services. At such a location the proposed net density of c. 80 uph is considered appropriate. |
| Provision of community facilities | Sustainable neighbourhoods require a range of community facilities including childcare, schools and retail provision. | The proposed development is directly adjacent to schools. A supermarket and other retail units are located within c. 550m of the subject site. The proposed development is within the built area of Bray and proximate to all of the community facilities within the town. The subject development includes a childcare facility, café opening onto a market square, open spaces, linear walks/tracks and a multi-use games area (MUGA) and park which will be open to the proposed development and the wider area. |
| Daylight, Sunlight and Energy Efficiency | <p>The efficiency gains derived from passive solar estate layouts should be enhanced by designing individual dwellings so that solar collection is maximised.</p> <p>Where overshadowing may be an issue daylight and shadow projection diagrams be submitted.</p> | <p>56% of apartments (including duplexes) are dual aspect.</p> <p>Design mitigation measures implemented to improve daylight performance include: the increase of window sizes, reconfiguration of unit layouts and the redesign of balconies. These measures, among others, have resulted in a high compliance rate for Average Daylight Factor (ADF) across the proposed apartment buildings.</p> <p>A daylight and sunlight analysis of the proposed development has been undertaken by 3D Design Bureau as part of the design process. This assessment and report were produced under the guidance of the 3rd Edition of the BRE Guidelines (BRE 3) which were released in June 2022. The assessment shows that the scheme provides a favourable level of compliance under Daylight and Sunlight assessment. This favourable level of compliance is achieved both within the proposed residential accommodation and within the public and communal open spaces.</p> <p>The location of the apartment buildings along the coastal frontage on the east side of the Coastal Quarter is such that they have minimal impact on the daylighting or overshadowing of the houses within the Quarter and there is no impact on the daylighting of any existing surrounding residential areas.</p> <p><i>A Daylight and Sunlight Assessment Report</i> prepared by 3D Design Bureau is included as part of this application.</p> |
| Open Space | <p>The provision of adequate and well-designed private open space for apartments is crucial in meeting the amenity needs of residents; in particular, usable outdoor space is a high priority for families.</p> <p>Private open space can be provided in the form of rear gardens or patios for ground floor units, and balconies at upper levels. It is important that in the latter case adequate semi-private or communal open space, in the form of landscaped areas, should also be provided.</p> <p>Apartment developments may be unable to achieve public open space standards similar to suburban developments where bed space rates are considerably</p> | <p>Private balcony/terrace for apartments including duplex units are in accordance with or exceed the Design Standards area requirements of 9 sq.m, 7 sq.m and 5 sq.m respectively. All balconies/terraces are 1.5m deep or greater.</p> <p>Communal/semi-private open space is provided within courtyards associated with each apartment block. The overall communal area provided for each block comfortably exceeds that required by applying the Design Standards requirements of 9 sq.m, 7 sq.m and 5 sq.m respectively to the proposed apartments.</p> <p>The high quality, landscaped public open space enhances the visual and amenity value of the development, providing linear parkways, a river park and are linked with the coastal area, Bray Harbour, River Dargle and the Corke Abbey Valley Park. This is detailed fully in the landscape plans and <i>Landscape Design Strategy</i> included prepared by Park Hood Landscape Architects.</p> <p>A total of 13,463 sq.m (excluding 'F' land use zoning) of the subject site will provide a variety of open spaces including, new public plazas, parks, play facilities and new public cycle and pedestrian links. Play areas for a range of age groups</p> |

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| Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas | | |
|--|---|---|
| | <p>lower. The design of public open spaces in higher density areas is more critical, requires integration with the design concept and may need to be more intensively maintained.</p> <p>In large infill sites or brown field sites public open space should generally be provided at a minimum rate of 10% of the total site area;</p> | <p>will be provided with high quality play equipment and street furniture. In addition, 6,182 sq.m of communal gardens will also be provided which includes the provision of a Multi-Use Games Area (MUGA).</p> <p>Open space provided is well in excess of 10% of the subject site.</p> |
| Access for All | <p>Circulation within housing layouts, including access to individual buildings, should have regard to the varying needs of occupants over their lifetimes, including needs associated with mobility difficulties and the normal frailty associated with old age.</p> | <p>The proposed development has employed best practice design, ensuring that residential units are fully accessible and are flexible in their layout. The units will be able to adapt and evolve with the changing needs of prospective occupants over the life of the unit. The internal dimensions of the proposed units are generally in excess of the design standards as set out in the WCDP, the DLRCDP and the <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020</i>, offering generously sized rooms that are accessible for all.</p> |
| Waste Services | <p>Adequate provision is to be made for the storage and collection of waste materials.</p> | <p>The waste provision included in the proposed design has been informed by the <i>Outline Operational Waste Management Plan</i> prepared by Atkins and the design criteria set out in the guidelines.</p> |

7.2.6 Urban Design Manual – A Best Practice Guide (2009)

The Urban Design Manual seeks to create residential developments where people want to live and visit. In order to achieve this, the Urban Design Manual is based around 12 no. criteria:

- Context;
- Connections;
- Inclusivity;
- Variety;
- Parking;
- Efficiency;
- Distinctiveness;
- Layout;
- Public Realm;
- Adaptability;
- Privacy and Amenity; and
- Detailed Design

The 12 no. criteria are considered as a means of testing a proposal against the principles of good urban design. The proposed development has been designed with consideration for this criteria and good urban design practice has been incorporated throughout the proposal in its layout, public realm and open space. The consistency of the proposed development with the Urban Design Manual is provided within *Architectural Design Statement* prepared by Glenn Howells Architects.

7.2.7 Sustainable Urban Housing– Design Standards for New Apartments (2020)

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020* (the Apartment Standards) in December 2020. The updated document builds on previous guidelines published in 2015 taking account of; experience in their implementation since 2015 and is a technical update of the 2018 guidelines in relation to shared accommodation/co-living. The Apartment Standards address the need to enhance apartment output to secure both additional housing supply and more compact urban development patterns; and departmental and stakeholder research and analysis into the deliverability of increased supply of apartments. Accordingly, the Apartment Standards aim to:

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- Facilitate a mix of apartment types that better reflects household formation and housing demand.
- Making provision for more residential development to take place on infill and brownfield sites.
- Address the ‘Shared Accommodation’ or ‘Co-living sectors.
- Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking and secure storage.

A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. These locations within reasonable walking distance (i.e. up to 15 minutes or 1,000-1,500m) to/from high capacity urban public transport stops (such as DART or LUAS); and sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services are considered suitable for residential development such as that proposed.

The Apartment Standards also set out design standards in relation to:

- Apartment Mix;
- Internal Space Standards;
- Dual Aspect Ratios;
- Floor to Ceiling Heights;
- Apartment to Stair / Lift Ratio;
- Storage Spaces;
- Amenity Spaces Including Balconies and Patios;
- Car Parking; and
- Room Dimensions.

With regard to ‘build to rent’ development the Apartment Standards set out additional guidance. In this regard Specific Planning Policy Requirement 8 is particularly significant:

“For proposals that qualify as specific BTR development in accordance with SPPR 7:

- (i) *No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
- (ii) *(ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*
- (iii) *(iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.*
- (iv) *(iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- (v) *(v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.”*

The consistency of the proposed development with the Apartment Standards is outlined in **Table 7-6**.

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Table 7-6: Design Standards for Apartments Consistency Appraisal

| Apartment Standards | | |
|-------------------------|--|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Location | Within urban areas, the scale and extent of apartment development should increase in relation to proximity to core urban centres and public transport nodes | The scale and density of proposed development is appropriate. The development is within Bray town a large town with a population of 32,600 within the Dublin Metropolitan Area. The location is within c. 800m of Bray Daly railway station, adjacent to the planned LUAS Green line extension to Bray and within c. 550m of the planned Bray to City Centre Core Bus Corridor. |
| Housing Mix | <ul style="list-style-type: none"> Up to 50% one-bed / studio No min for three-bed | <p>The proposed development includes 510 no. apartments / duplexes. Of these 162 are located within Block A and are build to rent. The unit mix in the remaining 348 no. units is as set out below:</p> <ul style="list-style-type: none"> 46% 1-bedroom proposed. (Apt. / duplex Units) 43% 2-bedroom proposed. (Apt. / duplex Units) 11% 3-bedroom proposed. (Apt. / duplex Units) |
| Floor Area | <p>Minimum Apartment Floor Areas:</p> <ul style="list-style-type: none"> Studio apartment 37 sqm 1-bedroom apartment 45 sqm 2-bedroom apartment 63 sqm (3 person) 2-bedroom apartment 73 sqm (4 person) 3-bedroom apartment 90 sqm | <p>There are no studio apartments proposed.</p> <p>All apartments meet or exceed the floor area requirement. This is confirmed in the residential quality assessment provided within the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects enclosed with this application.</p> |
| Floor Area | Majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%. | In excess of 50% of the apartment units exceed by 10% or more the minimum floor areas. This is confirmed in the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects enclosed with this application. |
| Dual Aspect Ratio | <p>In suburban or intermediate locations, it is an objective that a minimum of 50% of apartments will be dual aspect.</p> <p>At least 33% of units should be dual aspect in more central, accessible and some intermediate locations (i.e. near city or town centres). Ideally any 3 bedroom apartments should be dual aspect.</p> | Aspect and orientation of the apartment units have been designed to maximise the favourable aspects. 56% of apartments and duplex units will be dual aspect. There are no single aspect north facing apartments proposed. |
| Floor to Ceiling Height | Ground floors, floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. Standard floor to ceiling height is 2.4m. | Proposed floor to ceiling heights are detailed in the residential quality assessment provided within the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects enclosed with this application. Typical upper level apartments have 2.5m floor to ceiling heights. Ground floor and lower level retail and residential units will have a 2.7m floor to ceiling heights. |
| Lift Core | A maximum of 12 apartments per floor on a lift core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, subject to overall design quality and compliance with building regulations. | The four residential buildings have a range of 7 - 11 apartments per core and are therefore in compliance with the standards. |
| Internal Storage | <p>Minimum storage requirements:</p> <ul style="list-style-type: none"> Studio 3 sqm 1-bed 3 sqm 2-bed (3 person) 5 sqm | The storage provision within each the units equals or exceeds the requirements of 3 sq.m, 6 sq.m and 9 sq.m respectively and is provided within the apartment. This is confirmed in the <i>Housing Quality</i> |

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| Apartment Standards | | |
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| | <ul style="list-style-type: none"> • 2-bed (4 person) 6 sqm • 3+ bed (5+ person) 9 sqm <p>Secure storage can be provided outside individual units, and this may be used to satisfy up to half of the minimum storage requirement for individual apartment units.</p> | <p><i>Assessment</i> prepared by Glenn Howells Architects enclosed with this application.</p> |
| Private Amenity Space | <p>Private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.</p> <ul style="list-style-type: none"> • 1-bed 5 sq.m • 2-bed (3 person) 6 sq.m • 2-bed (4 person) 7 sq.m • 3+ bed (5+ person) 9 sq.m <p>Minimum depth of 1.5m is required for balconies, primarily accessed from living room.</p> <p>Standards may be relaxed for refurbishment schemes, or on urban infill sites of up to 0.25 ha, subject to overall design quality.</p> | <p>Private balcony/terrace areas are in accordance with or exceed the area requirements of 5 sq.m, 7 sq.m and 9 sq.m respectively.</p> <p>All balconies/terraces are 1.6m deep or greater.</p> |
| Security Considerations | <p>Apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.</p> | <p>All streets and landscaped spaces areas benefit from passive surveillance. Particular attention has been paid to the passive supervision of the Coastal Gardens landscaped spaces;</p> <p>these areas are for pedestrian and cycle use only and these spaces run parallel to the railway line. Passive surveillance is provided by the lower-level apartments residential lobbies and commercial units to blocks A, B, C and D and by the front kitchens of the townhouses.</p> <p>The houses and duplex residential units all have street frontages with own door access in order to focus activity onto the streets Within Block B, further activity is provided by the ground and 1st floor commercial uses at the south-east corner, providing activity and passive surveillance at a key pedestrian and cycle route to the wider Bray area through the railway underpass.</p> <p>Entrance points shall be clearly indicated, well lit, and overlooked by adjoining dwellings.</p> |
| Access and Services | <p>Apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations.</p> | <p>Apartments are being designed to be compliant with Part M of the building regulations. This is confirmed in the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects.</p> |
| Communal Facilities | <p>Communal rooms including, laundry facilities, community or meeting rooms and gym may be provided in apartment schemes, particularly in larger developments.</p> | <p>While only Block A is proposed as a Build to Rent block, both blocks A and B provide high quality residential communal facilities which include reception spaces, resident lounge area, co-working spaces and gym / fitness centre.</p> |
| Childcare | <p>Threshold for provision of childcare facilities in apartment schemes should be established having regard to the scale and unit mix; existing childcare facilities and demographic profile of the area. One-bedroom or studio units should not generally be considered to contribute to requirement for any childcare provision and subject to location, this may</p> | <p>A childcare facility is proposed. This is considered to accord with Apartment Guidelines and is more fully detailed in the enclosed <i>Childcare Demand Analysis</i> prepared by RPS.</p> |

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| | also apply in part, or whole to units with two or more bedrooms. | |
| Refuse Storage | <p>Provision shall be made for the storage and collection of waste materials in apartment schemes. Refuse facilities shall be accessible to each apartment stair/ lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.</p> <p>The following general design considerations should be taken into account in the provision of refuse storage facilities:</p> <p>Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;</p> <p>In larger apartment schemes, consideration should also be given to the provision of separate collection facilities for other recyclables such as glass and plastics.</p> <ul style="list-style-type: none"> • Waste storage areas must be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies and taking account the avoidance of nuisance for habitable rooms nearby; • Provision in the layout for sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people; • Waste storage areas should not present any safety risks to users and should be well-lit; • Waste storage areas should not be on the public street, and should not be visible to or accessible by the general public. Appropriate visual screening should be provided, particularly in the vicinity of apartment buildings; • Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles; • The capacity for washing down waste storage areas, with wastewater discharging to the sewer. | <p>The provision for refuse facilities is detailed in the <i>Outline Operational Waste Management Plan</i> prepared by Atkins enclosed. A three-bin system for the collection of mixed dry recyclables, organic waste and residual waste shall be facilitated. Details with respect to the provision of waste facilities is confirmed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects.</p> |
| Communal Amenity Space | <ul style="list-style-type: none"> • One bedroom: 5 sq.m • Two bedrooms: (3 person) 6 sq.m • Two bedrooms: (4 person) 7 sq.m • Three bedrooms: 9 sqm | <p>Communal/semi-private open space is provided within the courtyards associated with each of the apartment blocks.</p> <p>Each block provides:</p> <p>Block A: req 990 sq.m, proposed 2,287 sq.m</p> <p>Block B: req 1,160 sq.m, proposed 2,059 sq.m</p> <p>Block C: req 478 sq.m, proposed 608 sq.m</p> <p>Block D: req 142 sq.m, proposed 153 sq.m.</p> |

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| Apartment Standards | | |
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| | | The spaces provided comfortably exceed the requirements. Additional public open spaces are provided, the details of which are set out in Section 6.8 . |
| Children's Play | <p>Recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs should be catered for:</p> <ul style="list-style-type: none"> • Within the private open space associated with individual apartments; • Within small play spaces (c.85-100 sqm) for children up to age of 6 in a scheme that includes 25 or more units with 2 or more bedrooms. • Within play areas (200- 400 sqm) older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms. | <p>Private open space within apartments accords with <i>Sustainable Urban Housing: Design Standards for New Apartments</i> and provides for children's play needs.</p> <p>Play areas for children up to age of 6 are provided within the courtyards of apartment blocks, or as in Block D immediately adjacent. These areas combined extend to 375 sq.m.</p> <p>An additional 377 sq.m of play areas for 0 – 6 years are provided in public spaces Market Square and Coastal Garden.</p> <p>A community play area of 469 sq.m is also provided in the south of the Coastal Garden</p> <p>The multi-use games area (MUGA) of 1,817 sq.m is provided as part of the open space strategy.</p> <p>The spaces provided comfortably exceed the requirements.</p> <p>Further detail is set out in the <i>Landscape Design Strategy</i> prepared by Park Hood Landscape Architects.</p> |
| Bicycle Parking and Storage | <p>General minimum standard of 1 no. cycle storage space per bedroom.</p> <p>Visitor cycle parking shall also be provided at a standard of 1 no. space per 2 no. residential units.</p> <p>Parking should be sheltered, secure and safe. It is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided.</p> | <p>791 no. resident bicycle parking spaces are proposed to cater for apartment blocks A, B, C and D. This is in excess of the 1 space per bedroom requirement which totals 699 No. These spaces are secure and sheltered within secured enclosed spaces in the basement/undercroft areas. An additional 254 no. bicycle parking spaces are proposed for visitor use, which exceeds the requirement of 234 No. This combines to a total provision of 1,045 no. spaces for the residential elements of Blocks A, B, C and D.</p> <p>Further detail is set out in the <i>Traffic and Transport Assessment</i> prepared by Atkins.</p> |
| Car Parking | <p>Section 4.18 states that the quantum of car parking provision for residential developments generally is a matter for individual planning authorities having regard to local circumstances (notably location and access to public transport).</p> <ul style="list-style-type: none"> • Central and/or Accessible Urban Locations: Car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. • Intermediate Urban Locations: a reduced overall car parking standard. • Peripheral and/or Less Accessible Urban Locations: one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required. | <p>The development site is considered to be an intermediate urban location with central location characteristics. Whilst a specific standard for intermediate locations is not stated, the range of provision extends from 1 car space per unit for residential and 1 car space per 3-4 units for visitor in peripheral locations to potentially zero provision in a central location.</p> <p>It is proposed to provide 299 no. apartment unit resident parking spaces and 23 no. visitor parking spaces.</p> <p>Proposed car parking provision is set out in greater detail in the <i>Traffic and Transport Assessment</i> prepared by Atkins.</p> |
| Apartments and the Development Management Process | <ul style="list-style-type: none"> • Section 6.0 provides guidance on what is to be included in a planning application for an apartment development: • A schedule that details the number and type of apartments and associated individual unit floor areas | <p>A schedule detailing the number and type of apartments and associated individual unit floor areas and identifying those that provide a floor area 10% greater than the minimum floor area standard is provided in the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects. This schedule also details proposed private amenity space and internal</p> |

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| Apartment Standards | | |
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| | <ul style="list-style-type: none"> • A schedule of apartment accommodation should identify the proposed apartments that are at least 10% greater than the minimum floor area standard in schemes with 100 or more apartments • Unit schedules should detail proposed private amenity space and internal (and any external) storage space associated with each apartment. The schedule should also detail the aspect of each apartment, i.e. whether dual or single. • Floor areas should be in square metres and should be calculated from internal room dimensions. In addition to the above, planning application drawings must include the principal dimensions of each room as well as the aggregate floor area of each room. • Planning authorities should have regard to quantitative performance approaches to daylight provision outlined in guides like the BRE guide 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice • for Daylighting' when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision. • Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. • Planning applications shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents. | <p>(and any external) storage space associated with each apartment and details the aspect of each apartment.</p> <p>Planning application drawings include the principal dimensions of each room as well as the aggregate floor area of each room.</p> <p>A <i>Daylight and Sunlight Assessment Report</i> has been prepared by 3D Design Bureau and is enclosed in the planning application. The assessment has been prepared having regard to the third edition of the BRE guide '<i>Site Layout Planning for Daylight and Sunlight</i>'. The scheme can be considered to be performing favourably with regard to daylight & sunlight. A <i>Building Lifecycle Report</i> prepared by Aramark including an assessment of long term running and maintenance costs has been included in the planning application package.</p> |
| <p>Specific Planning Policy Requirement 7</p> | <p>(a) <i>Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such.</i></p> <p><i>Such conditions include a requirement that the development remains owned and</i></p> | <p>The statutory notices associated with this planning application specifically categorises part of the subject development as a 'Build-To-Rent' housing development.</p> <p>A proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that Block A of the proposed development remains as 'Build-To-Rent' is enclosed. The Build to Rent nature of the development is clearly outlined in the enclosed public notices accompanying the SHD application to An Bord Pleanála.</p> |

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| Apartment Standards | | |
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| | <p><i>operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;</i></p> <p>(b) <i>Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development.</i></p> <p><i>These facilities to be categorised as:</i></p> <p>(i) <i>Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.</i></p> <p>(ii) <i>Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.</i></p> | <p>Residential amenities and support facilities (as identified on the enclosed Architectural drawing prepared by Glenn Howells Architects) include:</p> <ul style="list-style-type: none"> • Concierge / Management area; • Gym; • Co-working space; • Resident Lounge; • External landscaped communal open space; and • Bicycle repair area. |
| <p>Specific Planning Policy Requirement 8</p> | <p>For proposals that qualify as specific BTR development in accordance with SPPR 7:</p> <p>(i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;</p> <p>(ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;</p> <p>(iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;</p> <p>(iv) The requirement that the majority of all apartments in a proposed scheme</p> | <p>Full details of the Private Open Space, Communal Open Space and Storage provision is set out on the enclosed Housing Quality Assessment document prepared by Glenn Howells Architects.</p> <p>The private open space and communal open space provision identified meets the requirements set out in the Apartment Guidelines.</p> <p>A car parking ratio ranging from c.0.72 to 0.60 spaces per unit is proposed for this proposal, which is considered to align with the recommendations of the apartment guidelines; the proximity of the site to adjoining public transport nodes; the level of bicycle parking provided; and the BTR nature of the proposal.</p> <p>The apartment sizes meet the standards set out in the Guidelines.</p> <p>The proposed apartments per floor per core meet the standards set out in the Guidelines.</p> |

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| Apartment Standards | |
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| | exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes; |
| (v) | The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations. |

7.2.8 Urban Development and Building Heights (2018)

The *Urban Development and Building Heights – Guidelines for Planning Authorities* (Building Heights Guidelines) were published in December 2018 to set out national planning policy guidelines on building heights in urban areas. The Building Heights Guidelines state that *“in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility”*.

Section 3.2 of the Guidelines set out a number of criteria against which a proposed development shall be assessed. Specific Planning Policy Requirement (SPPR) 3 states that:

“It is a specific planning policy requirement that where:

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”.

The proposed development has a range of building height, from 2 storeys to 12 storeys. Owing to the site’s accessible location within c. 800 metres of a DART railway station, c. 550 metres of bus stops facilitating high frequency travel in both directions on the Dublin Road and adjacent to the planned extension of the LUAS Green Line, an increased building height is considered to be appropriate in the context of *Urban Development and Building Height Guidelines 2018*. The consistency of the proposed development with the criteria relating to SPPR 3 is set out in **Table 7-7**.

Table 7-7: Building Heights Guidelines Consistency Appraisal

| Building Heights Guidelines | | |
|---|--|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Section 3.2: Development Management Criteria - At the scale of the relevant city/town | <ul style="list-style-type: none"> – <i>“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> – <i>Development proposals incorporating increased building height, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual</i> | <p>The proposed development is located approximately 800m and 550m from existing DART, commuter and intercity rail services and bus services respectively. The planned LUAS Green line extension is adjacent to the site and the planned Bray City Centre Route Corridor is c. 550m from the site.</p> <p>The proposed layout of the development has been informed by the site levels which fall from north to south across of the site. Blocks A and B have been designed to present as a strong building fronting onto the coastal boundary. A <i>Landscape and Visual Impact Assessment</i> has been prepared by Park Hood Landscape Architects and is included in the EIAR which illustrates the design and how it sits within the coastal landscape character.</p> |

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| Building Heights Guidelines | | |
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| | <p><i>assessment, by a suitably qualified practitioner such as a chartered landscape architect.</i></p> <ul style="list-style-type: none"> – <i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i> | <p>The proposed development includes new public spaces as well as new streets and green routes. These streets and public spaces are flanked by varied building types which accord with the existing built forms within Bray. This is detailed further in the enclosed <i>Architectural Design Statement</i> prepared by Glenn Howells Architects.</p> |
| <p>Section 3.2: Development Management Criteria - At the scale of district/ neighbourhood/ street</p> | <ul style="list-style-type: none"> – <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</i> – <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> – <i>The proposal enhances the urban design context for public spaces and key thoroughfares, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure.</i> – <i>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> – <i>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</i> | <p>The proposed development has been designed to respond to the existing natural and built environment and seaside location. The proposed development has a sense of place but is cognisant and respectful of the existing built form of Bray town with a comparable scale and urban grain. There is a strong visual and physical connection with the seafront.</p> <p>The proposed development includes significantly sized buildings. These have rhythm and are distinctive. The proposed apartment blocks are carefully modulated to avoid long, uninterrupted walls and include a range of materials, finishes and articulation to avoid a monolithic or overbearing appearance. In particular Blocks A and B will present as 4 blocks above podium with equal separation distances.</p> <p>The proposed development will make a positive contribution to the area by opening the subject lands to the public with new links through the site via public plazas and a network of pedestrian and cycle routes that will connect northward to Woodbrook Glen and to the seafront to the east. The Market Square will provide a unique and used urban space. The cumulative impact is significantly improved permeability and provision of high quality public open spaces will enhance the character and public realm.</p> <p>The proposed buildings will provide a strong edge to the east. The Market Square provides a clear focal point, adjacent to the planned LUAS line. The provision of north-south and east-west routes gives a coherence and legibility to the site complementing the Dargle River (east west) and DART line / coastline (north south).</p> <p>The proposed buildings frame new vistas and enclose new public and communal spaces with special consideration given to achieving appropriate height to width ratios to create an appropriate sense of scale and 'place'. The range of building typologies proposed are appropriate in a large town such as Bray which has had a preponderance of two storey housing.</p> <p>An <i>Architectural Design Statement</i> has been prepared by Glenn Howells Architects and is submitted as part of this application.</p> |

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| Building Heights Guidelines | | |
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| <p>Section 3.2: Development Management Criteria - At the scale of the site/building</p> | <ul style="list-style-type: none"> – <i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i> – <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.</i> – <i>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</i> | <p>The proposed layout, form, massing and height has been designed with consideration for access to light, ventilation and views both within the proposed scheme, and in terms of impacts on neighbouring properties.</p> <p>A daylight and sunlight analysis of the proposed development has been undertaken by 3D Design Bureau as part of the design process under the guidance of the 3rd Edition of the BRE Guidelines (BRE 3) which were released in June 2022. The assessment shows that the scheme provides a favourable level of compliance under Daylight and Sunlight assessment. The <i>Daylight and Sunlight Assessment Report</i> provides further detail and is included as part of this application.</p> <p>Throughout the design process, various mitigation measures were introduced to ensure the daylighting levels were improved across the apartments while maintaining the quality of the scheme and having regard for other planning objectives, <i>inter alia</i> housing density, building height, housing supply and urban design and placemaking. Design mitigation measures have been implemented to improve daylight performance included: the increase of window sizes, reconfiguration of unit layouts and the redesign of balconies</p> |
| <p>Section 3.2: Specific Assessments</p> | <ul style="list-style-type: none"> – <i>To support proposals at some or all of these scales, specific assessments may be required and these may include:</i> – <i>Potential micro-climatic effects such as down-draft.</i> – <i>Potential impacts in sensitive bird and/or bat areas.</i> – <i>Potential impact on important telecommunication channels such as microwave links.</i> – <i>Potential impact on air navigation.</i> – <i>Potential impact on historic built environment.</i> – <i>Relevant environmental assessment requirements including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> | <p>The following additional documents are enclosed as part of the application package:</p> <ul style="list-style-type: none"> – <i>Wind Microclimate Modelling Assessment</i> prepared by BFluid. – NIS prepared by Atkins. – An EIAR prepared by Atkins. <p>As part of the EIA process baseline studies were undertaken which included ecological, habitat and mammal surveys. These surveys have informed the design measures for the proposed development and include a planted buffer zone which will ensure the area provides for bat flight lines and foraging routes and measures to reduce the effects of artificial lights. The residual impacts of the development have been identified.</p> |

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| Building Heights Guidelines | | |
|-----------------------------|---|---|
| SPPR4 | <ul style="list-style-type: none"> – “It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: – 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines; – 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and – 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.” | <p>The proposed development will achieve a more sustainable net density for the subject site at 80 uph (including development permitted under ABP Ref. 311181-21, which is above the minimum densities for such locations set out in the <i>Sustainable Residential Development in Urban Areas</i> Guidelines.</p> <p>The proposed buildings will introduce a mix of building heights and types to the area. The proposed houses and duplexes range in height from 2 – 3 storeys with the proposed 4 no. apartment blocks ranging in height from 3 – 12 storeys.</p> <p>The development will include a range of housing sizes and typologies and 1, 2, 3 and 4-bed units in apartment block and duplex arrangement as considered in the <i>Housing and Tenure Types and Unit Mix Report</i> prepared by RPS and enclosed as part of the application.</p> <p>Further information is provided in Section 4.3 and the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects and enclosed as part of the application.</p> |

7.2.9 Childcare Facilities - Guidelines for Planning Authorities (2001)

The *Childcare Facilities – Guidelines for Planning Authorities* (Childcare Guidelines) provide a framework to planning authorities for the preparation of forward planning documents and set a standard for assessing planning applications with consideration for childcare facilities.

The Childcare Guidelines state that planning authorities should require the provision of “one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings”. However, the Guidelines note that: “this is a guideline standard and will depend on the particular circumstances of each individual site”.

A *Childcare Demand Analysis* was prepared by RPS and is enclosed as part of the application package. The report provides an analysis of existing and permitted childcare facilities within a 3km isochrone of the subject site and has consideration for CSO data and consultations with the Dún Laoghaire-Rathdown and Wicklow Childcare Committees.

The *Childcare Demand Analysis* notes that the Childcare Guidelines, Apartment Standards and Sustainable Residential Development Guidelines recognise the need to assess proposals, like the proposed development, based on their individual merits. With regard to housing mix the Apartment Guidelines state: “one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision”.

Considering existing and permitted childcare facilities in the study area, population demographics, relevant policy and guidelines, it is concluded that the proposed childcare facility providing 88 no. childcare places will exceed the demand generated by the permitted development, the proposed development and also cater for further phases of the *Harbour Point Masterplan*.

The proposed childcare facility is consistent with that which is permitted under ABP Ref. 311181-21.

PLANNING REPORT & STATEMENT OF CONSISTENCY

7.2.10 Design Manual for Urban Roads and Streets (2013)

Atkins have undertaken a separate appraisal of the proposed development and its conformity with the *Design Manual for Urban Roads and Streets 2013*. This appraisal of consistency (*DMURS Statement*) is enclosed as part of this application. The DMURS Statement concludes “*the proposed Coastal Quarter development is consistent with the requirements for the design of urban roads and streets as set out in DMURS*”.

7.2.11 Part V of the Planning and Development Act 2000 Guidelines (2017)

The proposed development is subject to the requirement of Part V of the Planning and Development Acts 2000. In accordance with Section 96, Part V of the Planning and Development Acts 2000 a total of 62 no. units will be transferred to the Planning Authorities (28 no. units to be transferred to DLRCC and 34 units to be transferred to WCC) for social and affordable housing.

The location of units proposed to be transferred in Blocks C and D to meet Part V requirements are illustrated in the Part V drawing (Dwg. Nos. BRA-GHA-SW-ZZ-DR-A-05021, BRA-GHA-SW-XX-DR-A-04002, BRA-GHA-SW-ZZ-DR-A-05020, BRA-GHA-SW-XX-DR-A-04001) prepared by Glenn Howells Architects and enclosed as part of the application package. A summary of costings in relation to Part V is also included as part of the planning application package along with letters from both planning authorities agreeing in principle to the proposals.

7.2.12 Planning System and Flood Risk Management (2009)

The *Planning System and Flood Risk Management Guidelines* (FRM guidelines) introduced “*comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process*”. The FRM guidelines were prepared by the Office of Public Works (OPW) in partnership with the then Department of Environment, Heritage and Local Government (DEHLG). The OPW is the lead agency for flood risk management in Ireland and develop indicative flood maps and catchment-based Flood Risk Management Plans (FRMPs) in partnership with planning authorities, the Environmental Protection Agency (EPA) and other relevant departments and bodies.

Implementation of the FRM guidelines will be achieved through actions at the national, regional, local and site-specific levels. The FRM guidelines assist in the preparation of relevant national and regional departmental publications and regulations which in turn guide local planning authority policies and objectives. At local level, the FRM guidelines highlight that “*flood risk is a key consideration in preparing development plans and local area plans and in the assessment of planning applications*”.

The FRM guidelines also states that they “*should be utilised by developers and the wider public in addressing flood risk in preparing development proposals*”. When applying for planning permission, applicants and their agents are required to:

- 76 “*Carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding, on specific sites and declaring any known flood history in the planning application form as required under the Planning and Development Regulations 2006.*”
- 77 “*Engage with planning authorities at an early stage, utilising the arrangements for pre-planning application consultation with regard to any flood risk assessment issues that may arise.*”
- 78 “*Carry out a site-specific flood risk assessment, as appropriate, and comply with the terms and conditions of any grant of planning permission with regard to the minimisation of flood risk*”.

A *Flood Risk Assessment* has been prepared by Atkins and is enclosed as part of this application confirming compliance with these requirements.

7.2.13 Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)

This guidance document is intended to assist and guide local and planning authorities in the application of Article 6(3) and 6(4) of the Habitats Directive as it relates to their roles, functions and responsibilities in undertaking Appropriate Assessment (AA) of plans and projects. It explains the concepts, tests and steps involved in the assessment procedure, the provisions of which are the primary mechanism for ensuring the protection of Natura 2000 sites and their conservation objectives when considering whether to authorise or adopt a plan or project. Natura 2000 sites in Ireland are European sites, including Special Protection Areas (SPAs), and Special Areas of Conservation (SACs).

An appropriate assessment has been undertaken and a NIS has been prepared by Atkins and is enclosed as part of this application.

7.3 Regional Level

7.3.1 Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031

The *Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly 2019-2031* including the Metropolitan Area Strategic Plans (MASP) support the implementation of the NPF and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region. The RSES will:

“Take account of national policy – the NPF – Ireland 2040 and future national planning frameworks, Support and reflect the economic policies and objectives of Government and link with spatial planning objectives, Consider the qualities, population size, service offering and location of our towns and cities, and Support balanced economic development, building on the individual strengths of the 3 Irish regions and our shared interests (including our links with Northern Ireland)”

The high level vision set out in the RSES is:

“To create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.”

This vision is underpinned by three key principles:

- *“Healthy Placemaking To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in.*
- *Climate Action The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.*
- *Economic Opportunity To create the right conditions and opportunities for the Region to realise sustained economic growth and employment that ensures good living standards for all.”*

The RSES designates Bray as one of only three “Key Towns” within the region. These key towns are described as:

“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.”

PLANNING REPORT & STATEMENT OF CONSISTENCY

The RSES identifies the Dublin Metropolitan Area as, “the continuous built up city area and the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, Bray and Greystones”. The Growth enablers for the Dublin Metropolitan Area include “to realise ambitious compact development targets at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other metropolitan settlements.”

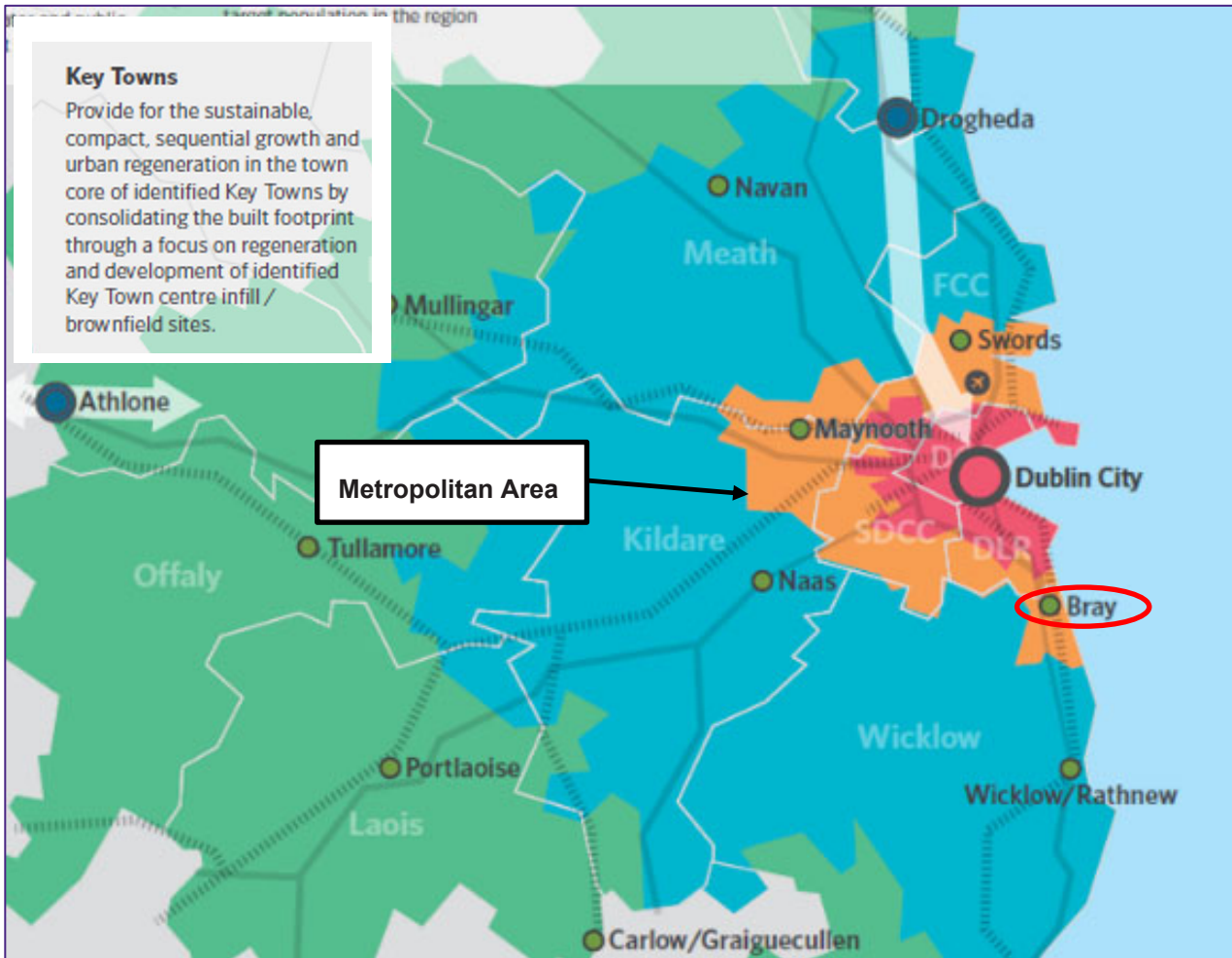


Figure 7-2: Bray and the Eastern and Midland Region

Source: EMRA, RSES Figure 4.2 Settlement Strategy

With regard to housing, the RSES identifies an acute need to increase the supply of housing, particularly within cities and defined settlements. RPO 4.37 of the RSES specifically supports large scale development and development of the former Bray Golf Course lands.

The consistency of the proposed development with the RSES is outlined in **Table 7-8**.

Table 7-8: RSES Consistency Appraisal

| Regional Spatial and Economic Strategy | | |
|--|---|--|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| 3 Key Principles | Heathy Placemaking - Creation of healthy and attractive places to live. | Proposed development includes play areas for children and is located proximate to significant green areas including Corke Abbey Valley Park, Dargle Walk, Bray Harbour and coastal area. The location of the development supports pedestrian, cycling and public transport travel. |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| Regional Spatial and Economic Strategy | | |
|--|--|---|
| | Climate Action - Enhance climate resilience and to accelerate a transition to a low carbon economy. | <p>Construction materials, public transport access and pedestrian cycle connectivity all promote climate resilience.</p> <p>The proposed development is served by existing public transport services including DART and bus, and planned public transport services including DART+, Bus Connects and LUAS.</p> <p>The proposed development includes pedestrian /cycle linkages with Bray town centre and the coastal area as the overall layout favours pedestrian and cycle movement.</p> <p>Detail is provided on the building fabric elements and the efficient, longevity and maintenance are provided in the <i>Building Lifecycle Report</i> prepared by Atkins and the <i>MEP Engineering Report and Energy Statement</i> also prepared by Atkins and included as part of the application documentation.</p> |
| | Economic Opportunity - Create the right conditions and opportunities for the Region to realise sustained economic growth and employment. | The proposed development will increase housing supply thereby addressing a key potential constraint on economic growth within the region. |
| Regional Strategic Outcomes | Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. | <p>The proposed development is located within an existing large town (designated a "key town") in the Dublin Metropolitan Area. The subject site was formerly part of a golf course and is currently underutilised.</p> <p>The proposed residential development provides high quality housing within an existing large town and served by existing and planned public transport.</p> |
| | Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. | The proposed development is located within c. 800m of the existing Bray Daly railway station and c. 550m east of bus services. The site is immediately adjacent to the proposed LUAS Green Line extension and proximate to the planned Bray – City Centre core bus corridor. The proposed development includes high quality pedestrian / cyclist links which will support connectivity with these public transport services and will support future ridership of bus and rail services. |
| | Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. | <p>Construction materials, public transport access, pedestrian connectivity all promote climate resilience.</p> <p>The <i>Building Lifecycle Report</i> and <i>MEP Engineering Report and Energy Statement</i> prepared by Atkins included in the application documentation provides detail with respect energy assumptions and futureproofing the proposed development .</p> |
| Housing Policy Objectives | Support Local Authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low cost rental and affordable homeownership. | <p>In accordance with Section 96, Part V of the Planning and Development Acts 2000, 62 no. units will be transferred to the Planning Authorities for social and affordable housing.</p> <p>The location of units proposed to be transferred to meet Part V requirements are illustrated in the Part V drawing prepared by Glenn Howells Architects and submitted as part of the application package.</p> <p>A summary of costings in relation to Part V is also included with this application along with letters of agreement from both Wicklow County Council (22.08.22) and Dún Laoghaire Rathdown County Council (11.08.22).</p> |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| Regional Spatial and Economic Strategy | | |
|--|---|--|
| | Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population. | <p>The proposed development includes a variety of apartments and duplexes including 1, 2 and 3 bed units in addition to 2, 3 and 4-bedroom houses of varying designs. The variations in size, layout, storage space and private open space ensure the proposed development provides a range of housing types which will be attractive to a wide demographic.</p> <p>As detailed in the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects the proposed development includes public and private amenity spaces and play areas for younger and older children.</p> <p>The high quality existing and planned public transport provisions serving the proposed development ensure the development will be attractive to those without access to a private motor vehicle.</p> |
| RPO 4.37 | Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements. | The proposed development shall provide 586 no. residential units on the former Bray Golf Course on lands within counties Wicklow and Dublin and served by existing and planned high capacity public transport. |
| RPO 4.40 | To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services. | The proposed development is located immediately adjacent to the planned LUAS Green line extension. The URDF has allocated funding to the construction of a public transport bridge which will connect the former golf club lands to the DART railway station, this will cater for pedestrian, cycle and bus based links and ultimately can cater for the LUAS in the longer term. This infrastructure will assist Bray's renewal and development. The development and delivery of the golf club lands of the nature and scale envisaged by the <i>Harbour Point Masterplan</i> will benefit from this infrastructure. |
| RPO 4.41 | Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance. | The proposed development is within Bray town. All facilities within the town are easily accessible on foot or by bicycle and a cycle / pedestrian network within the subject site is proposed. The subject site is located approximately 800m from existing DART, commuter and intercity rail services and c. 550m from existing bus services. The proposed masterplan layout ensures that the extension of the LUAS Green line and bus routes serving the site directly are facilitated. |

PLANNING REPORT & STATEMENT OF CONSISTENCY

7.3.2 Transport Strategy for the Greater Dublin Area 2016-2035

The *Transport Strategy for the Greater Dublin Area, 2016 to 2035* (Transport Strategy), prepared by the National Transport Authority sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare up to 2035. The strategic purpose of the Transport Strategy is “*To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods*”. Currently a review of the Transport Strategy is ongoing.

The Transport Strategy promotes significant improvements to the pedestrian and cycling network in order to maximise inclusive accessibility for all. The Transport Strategy supports the LUAS Green Line extension to Bray and the Bray to City Centre core bus corridor.

With regard to development, including residential development, the Transport Strategy supports the integration of land use and transport through:

- Reducing the need to travel;
- Reducing the distance travelled;
- Reducing the time take of travel;
- Promoting walking and cycling; and
- Promoting public transport use.

Strategic Planning Principles of the Transport Strategy state that:

- “*Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA;*
- *To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised”.*

The consistency of the proposed development with the Transport Strategy is outlined in **Table 7-9**.

Table 7-9: Transport Strategy Consistency Appraisal

| Transport Strategy | | |
|---|---|--|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Land Use Integration and Behavioural Change (Chapter 7) - Local Planning Principles | Planning at the local level should promote walking, cycling and public transport by maximizing the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools | The proposed development: <ul style="list-style-type: none"> • is located within Bray town and directly adjacent to two schools. The services and amenities within the town are within walking/cycling distance of the proposed development; • includes cycle and pedestrian paths, linking directly to an existing wider network of footpaths and cycle paths; and; • is located approximately 800m from Bray railway station, c. 550m from existing bus services and directly adjacent to the planned LUAS Green line extension and local bus services. |
| | New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to a give competitive advantage to these modes; | Pedestrian / cycling routes are proposed within the subject site, connecting with the wider network including routes to Bray Town Centre and Corke Abbey Valley Park. |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| Transport Strategy | | |
|---|--|---|
| | Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips; | The proposed development prioritises pedestrian and cycle linkages. The proposed network will ensure that car movement within the site will be minimised with there being no through trips and an internal network which accords with DMURS. |
| Planned Transport Infrastructure Upgrades | Extension of LUAS Green Line to Bray is an objective of the Strategy. | The proposed development is located immediately adjacent to the planned LUAS Green line extension. The urban design including the network of routes within the site and the proposed Market Square have been designed to function with the planned LUAS and to provide a central shared space within Harbour Point. The subject development will promote use of this public transport infrastructure. |
| | Core Radial Bus Network: Bray/N11–UCD–Donnybrook | The proposed development is located c. 550m from planned core bus network services. The subject development will promote use of this public transport service. |

7.3.3 Draft Transport Strategy for the Greater Dublin Area 2022-2042

The Draft Transport Strategy for the Greater Dublin Area, 2022 to 2042 (Transport Strategy), prepared by the NTA sets out an updated transport infrastructure strategy for the region, covering Dublin, Meath, Wicklow and Kildare up to 2042. The strategy purpose of the Transport Strategy is:

“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports economic growth.”

The consistency of the proposed development with the Draft Transport Strategy is outlined in **Table 7-10**.

Table 7-10: Draft Transport Strategy for the Greater Dublin Area, 2022 to 2042 - Consistency Appraisal

| Draft Transport Strategy | |
|--|--|
| Reference | Relevant Policy / Objective / Guidance |
| Strategy Objectives 5.3 | Connected Communities - To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling. |
| Measure PLAN1 – Housing and Transport | The NTA will continue to support sustainable housing provision in the GDA and large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the majority of travel demand. |
| Measure PLAN2 – Consolidated Development | The NTA will only support development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services. |

7.3.4 Greater Dublin Area Cycle Network Plan (2013)

The *Cycle Network Plan* published by the NTA identifies the urban and inter-urban cycle network and the green route network within the Greater Dublin Area. As shown in **Figure 7-3** the subject site is proximate to B1, BG1 the River Dargle Greenway and the East Coast Trail (National Cycle Route 5) from the City to Bray.

PLANNING REPORT & STATEMENT OF CONSISTENCY



Figure 7-3: Proposed Cycle Network Within and Proximate to Subject Site¹

The proposed development is cognisant of these proposals and will provide for linkages with the wider cycle network. The DART underpass will provide for direct cycle connectivity with the East Coast Cycle Trail. Connectivity with the B1 and BG1 (River Dargle Greenway) routes is also proposed. The River Dargle Greenway is partially in place adjacent to the subject site. The *Harbour Point Masterplan* provides for the route from Castle Street to the Harbour. WCC has entered into an agreement with Irish Rail with respect to the use of the DART underpass. Further details with regard to the provision of cycling infrastructure and connectively is provided in the *Transport and Traffic Assessment* prepared by Atkins.

7.3.5 Draft 2021 Cycle Network Plan

The *Draft Cycle Network Plan* published by the NTA identifies the urban and inter-urban cycle network and the green route network within the Greater Dublin Area. As shown in **Figure 7-4** the subject site is proximate to a Greenway and a primary radial route.

¹ Source: *Proposed Cycle Network Bray & Enniskerry Sheet N20*

PLANNING REPORT & STATEMENT OF CONSISTENCY

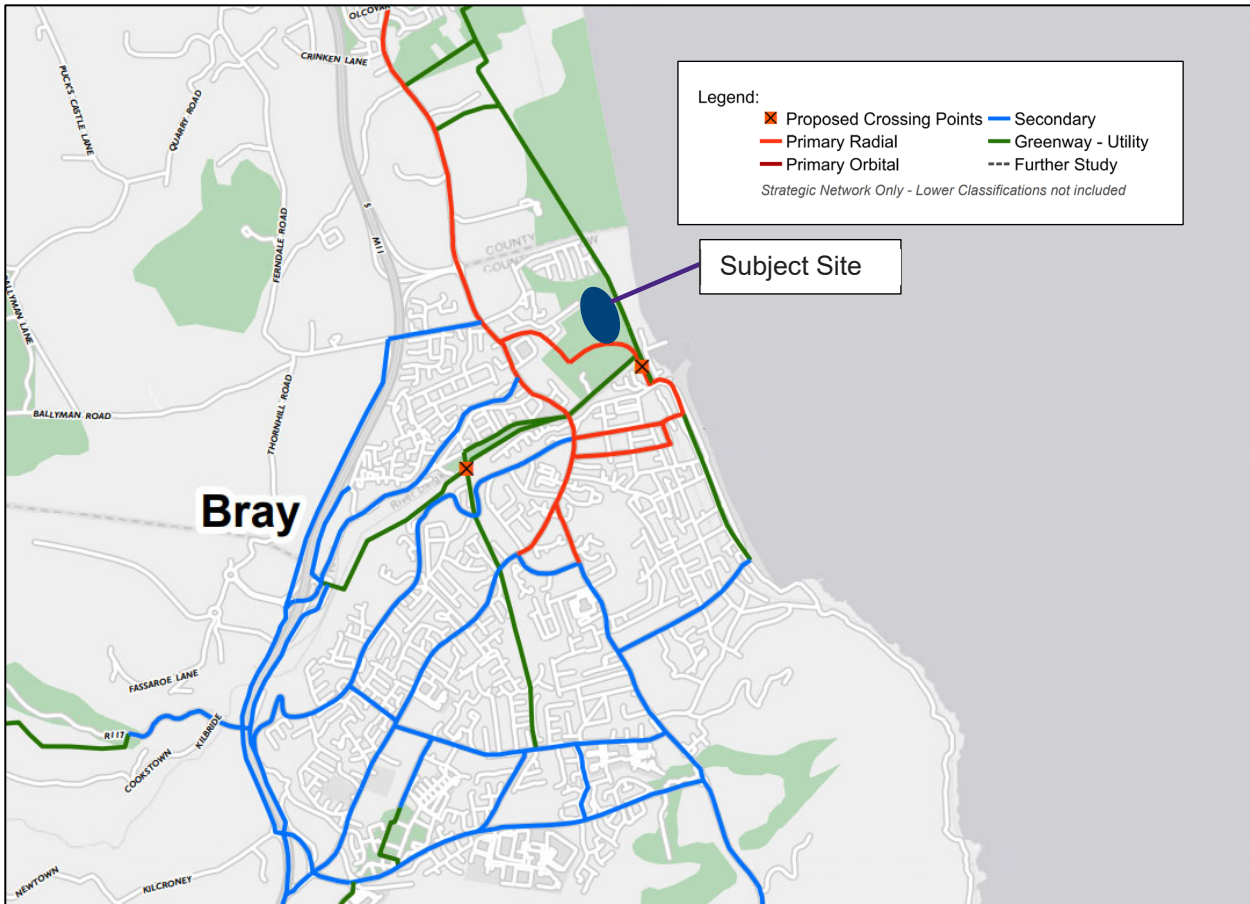


Figure 7-4: Proposed Cycle Network Within and Proximate to Subject Site²

7.4 County & Local Level

The Coastal Quarter area is approximately 7.84 hectares (net site area 7.28hectares) and straddles the administrative boundary of DLRCC and WCC. Approximately 3.65 hectares are located within DLRCC and approximately 4.19 hectares are located within WCC. The application site boundary extends to 8.81 hectares and includes areas for works to facilitate construction works and to provide ancillary services and connections. The application site boundary is illustrated on Drawing No. BRA-GHA-SW-XX-DR-A-05001.

The local planning policy framework for the site is set out in the DLRCDP, WCDP and the Bray LAP. The future development of the subject lands is governed by these plans which set out planning policies and objectives, as well as design standards for each administrative area. A composite map of the site in the context of both areas is provided in **Figure 7-4**.

² Source: *Proposed Cycle Network Map Bray & Enniskerry*

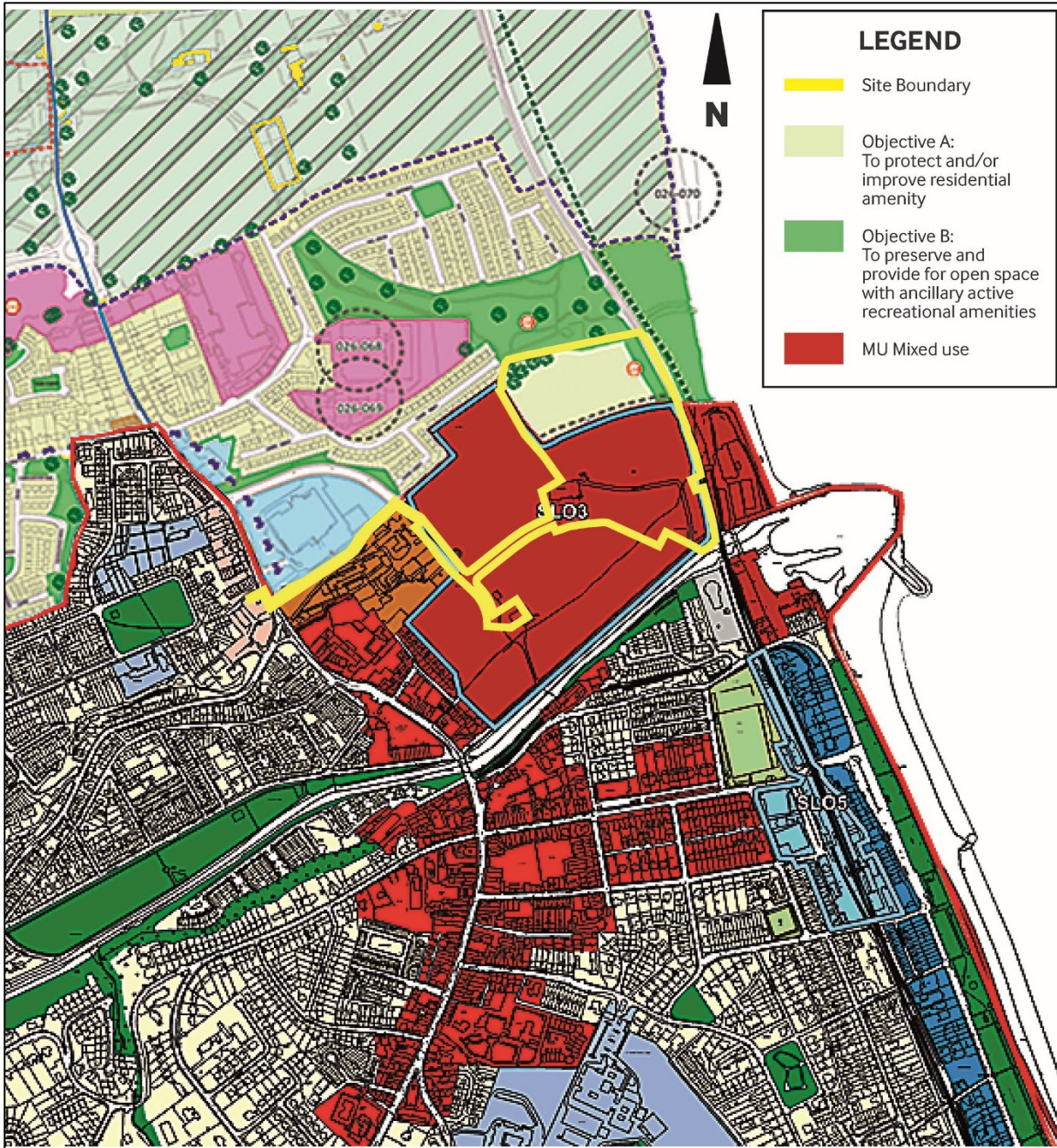


Figure 7-5: Land Use Zoning and Site Context

7.4.1 Dún Laoghaire-Rathdown County Council Development Plan 2022 – 2028

The local planning policy framework for the northern part of the site is set out in the DLRCDP. A high level vision statement set out in the Development Plan seeks:

“to embrace inclusiveness, champion quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver this in a manner that enhances our environment for future generations”

The subject proposals shall deliver a sustainable addition to Bray served by existing and planned public transport networks and within walking / cycling distance of the existing amenities within Bray.

PLANNING REPORT & STATEMENT OF CONSISTENCY

The Settlement Strategy of the Development Plan seeks to:

“support the overarching Development Plan Vision and supports the transition to a low carbon and climate resilient County through the implementation of a compact growth agenda, increased integration between land-use and transportation, increased sustainable mobility and, the sustainable management of our environmental resources.”

With regard to residential development, the Development Plan *“seeks to deliver compact and sustainable growth within the existing built footprint of the County and build upon existing physical, social, economic and natural assets”*. To achieve this, the Development Plan promotes infill residential development within established residential areas and promotes higher density development at appropriate strategic nodes along existing or planned public transport corridors.

The subject lands are located within the Metropolitan Area, in close proximity to existing DART and bus services and planned upgrades to the LUAS and bus network.

It is considered that the proposed development will provide much needed residential development at this highly accessible location in accordance with the Development Plan’s Core Strategy.

The subject lands within the DLRC administrative area are zoned ‘A’: *“To provide residential development and improve residential amenity while protecting the existing residential amenities”* and ‘F’: *“To preserve and provide for open space with ancillary active recreational amenities”*. (see **Figure 7-4**).

Within the DLRCDP uses considered to be ‘Permitted in Principle’ under the ‘A’ zoning objective relevant to this development include *inter alia* Residential. Uses considered to be ‘Permitted in Principle’ under the ‘F’ zoning objective include *inter alia*, open space, sports facilities, cultural use and community facility. It is highlighted to the Board that no residential development is proposed to be situated on lands under the ‘F’ zoning objective.

A number of DLRCDP transport objectives are also shown in **Figure 7-4** including:

- Proposed Core Bus Corridor Old Dublin Road, Bray;
- Proposed Sutton to Sandycove Walkway/Cycleway as a component part of the National East Coast Trail Cycle Route; and
- The extension of the LUAS Green Line to Bray.

The DLRCDP is underpinned by a number of cross cutting themes including the principles of creating a network of liveable towns and villages, a compact and connected county and a climate resilient country with a vibrant economy. Chapter 1 provides a strategic overview which sets the context for the more detailed policies and objectives contained therein. The DLRCDP’s overall aims and strategic direction of consolidated development, efficient use of land and integrated transport and land-use planning was formulated from a consideration of various national, regional and local documents including the NPF and RSES for the Eastern and Midland region.

The consistency of the proposed development with the DLRCDP is outlined in **Table 7-11**.

PLANNING REPORT & STATEMENT OF CONSISTENCY

Table 7-11: DLRCDP Consistency Appraisal

| Development Plan 2021-2027 | | |
|---|--|---|
| Reference | Relevant Policy/ Objective/ Guidance | Statement of Consistency |
| Overarching Policy Objective PHP1: | <i>“That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to: Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment.”</i> | The proposed development seeks permission for 586 no. residential units within a designated Key Town in the Greater Dublin Area. Compliance with the NPF and EMRA RSES is set out in Sections 7.2.1 and 7.3.1 respectively. The proposals accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County. |
| Policy Objective PHP3: Planning for Sustainable Communities | <i>“Plan for communities in accordance with the aims, objectives and principles of ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual – A Best Practice Guide’ and any amendment thereof.</i> <i>Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.”</i> | The compliance of the proposed development with Sustainable Residential Development in Urban Areas’ is set out in Section 7.2.4 and the accompanying <i>Urban Design Manual – A Best Practice Guide</i> is set out in the Architectural Design Statement provided by Glenn Howells Architects. The proposed residential development is within an existing town, directly adjacent to schools and within c. 800m of the Bray Daly railway station. A public park, childcare facility, café, gym, open space, MUGA and the Market Square are all proposed as part of the subject development. Additional facilities and a mix of uses will be provided in the planned development adjacent as detailed in the Harbour Point Masterplan. |
| Policy Objective PHP4: Villages and Neighbourhoods | <i>“It is a Policy Objective to: Implement a strategy for residential development based on a concept of sustainable urban villages. Promote and facilitate the provision of ‘10-minute’ neighbourhoods.”</i> | The proposed residential development is within an existing town, directly adjacent to schools and within c. 800m of the Bray Daly railway station. A public park, childcare facility, café, gym, open space, MUGA and the Market Square are all proposed as part of the subject development. Additional facilities and a mix of uses will be provided in the planned development adjacent as detailed in the Harbour Point Masterplan. Effectively the proposed development and wider Harbour Point Masterplan accords with the ‘10-minute’ neighbourhoods’ concept. |
| Policy Objective PHP6: Childcare Facilities | <i>“Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.</i> <i>Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.”</i> | Existing and permitted childcare facilities shall provide sufficient childcare capacity. The applicant engaged with Dún Laoghaire-Rathdown County Childcare Committee with respect to the proposed development. Further detail childcare provision in the area is provided in the <i>Childcare Demand Analysis Report</i> prepared by RPS. It is noted that the adequacy of the childcare facility to meet the childcare demand arising from the full development of the Coastal Quarter site was already considered and deemed acceptable by the Board under ABP Ref. 311181-21. |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| Development Plan 2021-2027 | | |
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| Policy Objective PHP18: Residential Density | <p><i>“Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.</i></p> <p><i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”</i></p> | The proposed development comprises of 586 no. apartments, duplexes and houses on a net site area of 7.28 hectares. The density of the quarter will be 80 uph. The net site area for the calculation of density excludes part of the site subject to the land use zoning objective ‘F’ and other areas outside the immediate area of development. This is further detailed in Section 6.1 . Within DLRCC the net density is 89 uph. This accords with the objective to consolidate infill sites. |
| Policy Objective PHP20: Protection of Existing Residential Amenity. | It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments. | There are a limited number of existing homes immediately adjacent to the subject development. The Irish Sea is to the east and Dargle River is to the south. The design of the proposed development has nonetheless been cognisant of these limited number of existing units adjacent. Further detail is provided in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects. |
| Policy Objective PHP25: | <i>“It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in ‘Housing for All – A new Housing Plan for Ireland, 2021’”</i> | Accordance with <i>Housing for All – A new Housing Plan for Ireland, 2021</i> is set out in Sections 7.2.2 . |
| Policy Objective PHP26: Implementation of the Housing Strategy | <i>“It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 - 2028.</i> | The proposed development delivers an increase in housing supply, which accords with the identified need for additional housing in the HDNA. |
| Policy Objective PHP27: Housing Mix and Type | <i>“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”</i> | The proposed development comprises a mix of apartments, duplexes and houses and units of 1, 2, 3 and 4 bedrooms. It is considered the proposed development shall contribute to a wide variety of housing and apartment types, sizes and tenures in accordance with the provisions of the Housing Strategy and Housing Need Demand being provided in DLR. This is further detailed in the enclosed <i>Housing and Tenure Types and Unit Mix Report</i> by RPS Group Ltd. |
| Policy Objective PHP28: Build to Rent | <i>“It is a Policy Objective to facilitate the provision of Build-to-Rent in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2020 (and any amendment thereof). Proliferation of Built to rent should be avoided in any one area. As the HNDA does not support provision of shared accommodation there shall be a presumption against granting planning permission for shared accommodation/o-living development”</i> | Block A of the development including 162 no. of the proposed 586 no. units is Build-to-Rent (28% of total). This is considered to be an appropriate quantum and does not constitute a proliferation of Build-to-Rent. A rationale for the Build-to-Rent at this location is presented in the <i>Housing and Tenure Types and Unit Mix Report</i> by RPS. The Build-to-Rent units do not comprise shared accommodation / co-living development. |
| Policy Objective PHP30: Housing for All | <i>Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.”</i> | The proposed development caters for a variety of lifestyle requirements by incorporating a good mix of units and types and settings in a central location. The provision of 1 and 2 bedroom apartment units in a location close to the town centre and public transport services meets well the needs of those seeking to downsize. The enclosed <i>Housing and Tenure Types and Unit Mix Report</i> by RPS addresses how the scheme provides for the needs of older persons. |

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| Policy Objective PHP31: Provision of Social Housing | <i>It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.</i> | In accordance with section 96 of the Planning Development Acts 2000 a total of 28 no. units will be transferred to Dún Laoghaire-Rathdown for social housing. Part V drawings have been prepared by Glenn Howells Architects identifying the location of the units and are enclosed. Evidence of agreement on principle reached with both Planning Authorities is submitted as part of this application. |
| Policy Objective PHP35: Healthy Placemaking | <p><i>"Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.</i></p> <p><i>Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013).</i></p> <p><i>Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design."</i></p> | <p>The scheme is designed as a new urban quarter, with its own unique character and sense of place but merging seamlessly and respectfully with the existing built form of Bray town with a comparable scale and urban grain.</p> <p>The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 respectively.</p> <p>The proposed design closely aligns with the design standards outlined in the <i>Urban Design Manual – A Best Practice Guide</i> (2009) and in the <i>Design Manual for Urban Roads and Streets</i> (2013) Guidelines.</p> <p>A statement of consistency with DMURS (DMURS Statement) prepared by Atkins is enclosed along with the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects which addresses how the principles of these Urban Design Manual are incorporated in the proposed development.</p> |
| Policy Objective PHP36: Inclusive Design & Universal Access | <i>It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i> | As further detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects the proposed development has been designed in accordance with Part M of the Building Regulations. The <i>Housing and Tenure Types and Unit Mix Report</i> by RPS also sets out how the proposed development addresses the needs of older people and persons with a disability. |
| Policy Objective PHP37: Public Realm Design | <i>It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.</i> | The proposed development shall provide public spaces and new pedestrian / cycle routes enhancing access to existing public spaces. The quality of the public realm proposed is detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects and the <i>Landscape Design Report</i> by Park Hood Landscape Architects. |
| 4 Policy Objective PHP38: Public Realm Offering | <i>It is a Policy Objective to preserve and enhance the public realm offering in our towns and villages.</i> | The proposed development shall provide public spaces and new pedestrian / cycle routes enhancing access to existing public spaces. The quality of the public realm proposed is detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects and the <i>Landscape Design Report</i> by Park Hood Landscape Architects. |
| Policy Objective PHP40: Shared Space Layouts | <i>It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).</i> | <p>The proposed design, including home zone streets closely aligns with the design standards outlined in the <i>Urban Design Manual – A Best Practice Guide</i> (2009) and in the <i>Design Manual for Urban Roads and Streets</i> (2013) Guidelines.</p> <p>A statement of consistency with DMURS (DMURS Statement) prepared by Atkins and the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects set out in detail on how the principles of these Guidelines are incorporated in the proposed development.</p> |

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| Policy Objective PHP41: Safer Living Environment | <i>It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.</i> | The proposed development is a high quality residential development with significant retail / commercial and social elements. Access to communal areas is controlled. Public and communal open space and routes through the site benefit from passive surveillance. |
| Policy Objective PHP42: Building Design & Height | <p><i>“Encourage high quality design of all new development.</i></p> <p><i>Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”</i></p> <p><i>Appendix 5 - Policy Objective BHS 1- Increased Height</i></p> <p><i>It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate..... in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NPO 35, SPPR 1& 3).</i></p> <p><i>Appendix 5 also sets out “performance based criteria” for the consideration of increased building height.</i></p> | <p>It is considered that the proposed development, within 1000m of an existing DART station is an appropriate location for the buildings proposed and accords generally with the performance based criteria.</p> <p>Section 3 of the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects addresses Building Height in detail and in particular sets out how the proposed heights are in accordance with the provisions of Appendix 5 and in particular the criteria set out in Table 5 of same.</p> <p>Section 6.2 of this Report also presents a rationale for the proposed building heights in the context of Appendix 5.</p> <p>Section 7.2.8 of this Report sets out the proposed development’s consistency with the <i>Urban Development and Building Heights – Guidelines for Planning Authorities</i> which are also addressed in the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects.</p> |
| Policy Objective PHP44: Design Statements | <i>“It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.”</i> | An <i>Architectural Design Statement</i> prepared by Glenn Howells Architects is enclosed in the planning application package. The Statement addresses how the proposed development the design criteria set out in the <i>Urban Design Manual - A Best Practice Guide</i> and incorporates adaptability of units and/or space within the scheme. |
| Policy Objective T1: Integration of Land Use and Transport Policies | <i>“It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high quality public transport systems. (Consistent with NSO 1, NPO 26 of the NPF, 64, RPO 4.40, 5.3, 8.1 and Guiding Principles on Integration of Land Use and Transport of the RSES).”</i> | <p>The proposed development is within an existing town and includes dedicated cycle and pedestrian paths and is located c. 800m north of the Bray Daly railway station. The site is within c. 550m of the planned Bray Dublin City Core bus corridor and existing bus services. The site is also adjacent to the planned LUAS Green line extension and proposed public transport bridge allocated funding under the URDF.</p> <p>The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 respectively.</p> |
| Policy Objective T9: Luas Extension and MetroLink | <i>It is a Policy Objective to promote, facilitate and cooperate with other agencies in securing the extension of the Luas network in the County as set out in the NTA’s ‘Greater Dublin Area Transport Strategy 2016-2035’ and including any future upgrade to Metro.</i> | Included in the <i>Greater Dublin Area Transport Strategy 2016-2035</i> are proposals to extend the Luas Green Line from Brides Glen to the Bray area. The proposed development has been designed to facilitate such an extension and specifically the |

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| | <i>(Consistent with RPO 4.40 and 8.8 of the RSES)</i> | planned public transport bridge over the River Dargle. |
| Policy Objective T10: Walking and Cycling | <i>"It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)."</i> | The proposed development includes dedicated cycle and pedestrian paths. There are north south and east west pedestrian / cycle routes proposed within the subject site. These routes provide direct connectivity to Bray town centre, Bray Daly railway station, the East Coast Cycle Trail and Corke Abbey Valley Park. The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 respectively. |
| Policy Objective T17: Travel Plans | <i>"It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)."</i> | A <i>Mobility Management Plan</i> prepared by Atkins is enclosed. This <i>Mobility Management Plan</i> sets out the strategy and measures proposed for the proposed development generally sets out a commitment to promoting alternatives and providing the means for active and sustainable travel choices to be made which include generally walking, cycling and public transport. |
| Policy Objective T18: Car Sharing Schemes | <i>"It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements."</i> | 2 no. of car share parking spaces are proposed. |
| Policy Objective T19: Carparking Standards | <i>"It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5."</i> Zone 2 House 1 per 1-2 bed 2 per 3 bed+ Apartment: 1 space per 1-2 bed unit 2 spaces per 3-bed unit | The proposed rate of car parking is outlined and considered in Section 6.8 of this Report. The quantum of parking has been selected to reflect national policy and guidance specifically the Apartment Standards which seeks to reduce car parking in locations that are proximate to public transport corridors. The proposed quantum is less than that provided for in the DLRCDP. However, it is noted that the DLRCDP provides for reduced car parking standards dependent upon specified criteria. These are considered to be applicable in this instance. This is considered further in the <i>Statement of Material Contravention</i> prepared by RPS. |
| Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits | <i>"It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines."</i> | A <i>Traffic and Transport Assessment</i> and <i>Road Safety Audit</i> prepared by Atkins is submitted with this application. |
| Policy Objective E11: Remote Working | <i>"It is a Policy Objective to implement the National Remote Working Strategy and promote and assist in the provision of remote working infrastructure in appropriate locations and in particular, where these uses contribute to town centre regeneration, facilitate the reuse of existing and historic buildings, and bring added activity and vibrancy to the area."</i> | The proposed development is located proximate to Bray town centre and as such future residents could easily access any remote working hub that might be provided in the town centre. Within Block A co-working home spaces are proposed. |

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| Policy Objective E16: Home Working / E-Working | <i>"It is a Policy Objective to permit home-based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas."</i> | The mix of unit types and sizes being provided means there is scope for some residents to work from home should they so choose. |
| Policy Objective CA18: Urban Greening | <i>"It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES)"</i> | The proposed development includes a well-considered landscape plan prepared by Park Hood. The landscape plan sets out details of the urban greening proposals. |
| Policy Objective OSR4: Public Open Space Standards | <p><i>"It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2020)</i></p> <p><i>It is a policy objective of the Plan, that the various categories of open space for both residential and mixed use and commercial be provided in accordance with the standards set out in the tables in Section 12.8.3 and Section 12.8.4 In the event that these standards of public open space provision are not met, an additional contribution in lieu may be attached to any permission, by way of planning condition, in accordance with Section 48 of the Planning and Development Act 2000, as amended. In certain instances, a development contribution will also be sought for communal open space provision."</i></p> <ul style="list-style-type: none"> – Public Open Space – 15% of site area. – Communal Open Space – One bed 5 sqm, two bedrooms (3 bed) 6 sqm, two bedrooms (4 bed) 7sqm, three bedrooms 9 sqm. – Private Open Space Houses - 1-2 bedroom 48 sqm, 3 bedrooms 60sqm, 4 bedrooms or more 75sqm. – Private Open Space Apartments - One bed 5 sqm, two bedrooms (3 persons) 6 sqm, two bedrooms (4 persons) 7sqm, three bedrooms 9 sqm. | <p>Details of how the development proposed complies with the provisions of <i>Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, Urban Design Manual - A Best Practice Guide</i> and the <i>Sustainable Urban Housing: Design Standards for new Apartments</i> are set out in Sections 7.2.5, 7.2.6 and 7.2.7 respectively.</p> <p>The open space provision for residential development is in accordance with the standards set out in the tables in Section 12.8.3 and Section 12.8.4 of the development plan. This is further detailed in Section 6.8 of this report and Dwg. No. BRA-GHA-SW-ZZ-DR-A-05006 prepared by Glenn Howells Architects.</p> |
| Policy Objective OSR7: Trees, Woodland and Forestry | <i>"It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the</i> | <p>It is understood that the <i>Tree Strategy for the County</i> has not yet been published.</p> <p>As detailed in the Landscape Strategy Report and shown in the Landscape Masterplan – Overall Plan</p> |

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| | <p><i>environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach.</i></p> <p><i>The Council will also seek to preserve trees, groups of trees and/or woodlands that form significant features in the landscape, and/or are important in setting the character, amenity, or ecology of an area. As part of this Plan, the Council Parks Department carried out a comprehensive review of the tree symbols on the 14 County Development Plan Maps (see also Section 12.8.11 Existing Trees and Hedgerows)."</i></p> | <p>(Dwg no. 6948-L-2000) prepared by Park Hood additional trees planting is proposed.</p> <p>There is an area within the subject site in which tree symbols ("To protect and preserve Trees and Woodlands") are located. As shown in Dwg no. 6948-L-0001 prepared by Park Hood these trees are largely unimpacted by the proposed development.</p> |
| Policy Objective OSR13: Play Facilities and Nature Based Play | <p><i>It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.</i></p> <p><i>The Council is moving towards a more Nature based Play philosophy and approach with respect to the provision of Play Opportunities in the County. This involves shifting the emphasis from merely equipment-based provision to using and leveraging the genius loci and landscape character of outdoor sites in combination with natural elements (e.g. earth sculpting, mounding, ponds, tree stumps). This Nature-based approach provides more rewarding experiences and improves health and well-being.</i></p> | <p>The proposed development will provide play areas for children of all ages. Dedicated play areas are provided for in the overall design within the podium gardens and in the communal areas. The MUGA also provides opportunities for play and sport for older children and adults. The proposed hard and soft landscaping within these plays areas and more broadly within the site facilitate play in a more natural setting. Further details are provided in the Landscape Masterplan – Overall Plan (Dwg no. 6948-L-2000) and Sitewide Hardscape Layout (Dwg no. 6948-L-2001) for the site prepared by Park Hood Landscape Architects.</p> |
| Green Roofs /Blue roofs | <p><i>Standard GR1- Planning applications which include roof areas of greater than 300 square metres for the following development types must make provision for a green and / or blue roof (which includes a green component) as part of development proposals. ♦ Apartment Developments</i></p> <p><i>Standard GR2 - To maximise the provision for biodiversity, green roofs must meet the following coverage requirements for all applicable buildings within the application boundary, subject to a reasonable allowance being made for the provision of services at roof level.</i></p> <p><i>Extensive 70%</i></p> <p><i>Intensive 50%</i></p> | <p>Please see Table 7 12: Compliance with Policy Objective EI6 DLRCC CDPT below outlining response to this item.</p> |
| 12.8.9 Play Facilities for Apartments and Residential Developments | <p><i>Children's play needs around the apartment building should include:</i></p> <ul style="list-style-type: none"> <i>Within the private open space associated with individual apartments.</i> | <p>Private open space within apartments accords with <i>Sustainable Urban Housing: Design Standards for New Apartments</i> and provides for children's play needs. Play areas for children up to age of 6 provided within the courtyards of apartment blocks, or as in</p> |

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| | <ul style="list-style-type: none"> • <i>Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,</i> • <i>Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.</i> | <p>Block D immediately adjacent are 375 sq.m in total. An additional 377 sq.m of play areas for 0 – 6 years is provided in public spaces in the Market Square and Coastal Garden. A community play area of 469 sq.m is provided in the south of the Coastal Garden. The multi-use games area (MUGA) of 1,817 sq.m is provided as part of the open space strategy. Further detail is set out in the <i>Landscape Strategy Report</i> prepared by Park Hood Landscape Architects.</p> |
| 12.8.11 Existing Trees and Hedgerows | <p><i>New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan.</i></p> <p><i>Arboricultural Assessments carried out by an independent, qualified Arborist shall be submitted as part of planning applications for sites that contain trees or other significant vegetation. The assessment shall contain a tree survey, implications assessment and method statement. The assessment of the site in question will inform the proposed layout, in relation to the retention of the maximum number of significant and good quality trees and hedgerows. Tree and hedgerow protection shall be carried out in accordance with BS 5837 (2012) ‘Trees in Relation to Design, Demolition and Construction – Recommendations’, or any subsequent document.</i></p> | <p>It is proposed that the northern and eastern hedgerows be maintained and additional planting along these entire boundaries be provided.</p> <p>There is an area within the subject site in which tree symbols (“<i>To protect and preserve Trees and Woodlands</i>”) are located. As shown in Dwg no. 6948-L-0001 prepared by Park Hood these trees are largely unimpacted by the proposed development.</p> <p>A <i>Tree Survey Report</i>, undertaken by Independent Tree Surveys is included as part of this application (EIAR, Volume 3). The report finds that the tree quality is generally low, with numerous smaller trees of relatively low value being spread around the old course. The findings of the tree report have guided the preparation of the design proposals.</p> |
| Policy Objective HER1: Protection of Archaeological Heritage | <p><i>It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments.</i></p> | <p>There is one recorded archaeological site located within the subject site and this comprises a linear earthwork (WI004-005----/DU026-124---). The results of a number of archaeological investigations in recent decades indicates that it is in fact of 19th century date and have produced no evidence to demonstrate that it formed part of the Pale ditch. Details of this are provided in the cultural heritage assessment prepared by JCA and included in the EIAR.</p> |
| Policy Objective HER2: Protection of Archaeological Material in Situ | <p><i>It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in</i></p> | <p>There is one recorded archaeological site located within the subject site and this comprises a linear earthwork (WI004-005----/DU026-124---). The results of a number of archaeological investigations in recent decades indicates that it is in fact of 19th century date and have produced no evidence to demonstrate that it formed part</p> |

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| | <i>the Record of Monuments and Places, the Council will have regard to the advice and/ or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG).</i> | of the Pale ditch. Details of this are provided in the cultural heritage assessment prepared by JCA and included in the EIAR. |
| Policy Objective E19: Drainage Impact Assessment | <i>It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council's Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).</i> | The <i>Stormwater Impact Assessment Report</i> prepared by Atkins addresses in detail the drainage proposals. Appendix 3 refers to section 10.2.2.9 and policy E19, confirming that all development proposals should be accompanied by a Drainage Impact Assessment (DIA) and it notes that applicants are advised to refer to the Councils Stormwater Management Policy and Appendix 7.1. It also advises that requirements for the DIA will be discussed at pre-planning stage. Appendix 7 relates to Sustainable Drainage System Measures in general. Section 7.1 specifically sets out a 'Stormwater Management Policy – Including Stormwater Audit Procedure'. We set out below a summary of the policy requirements and a comment on how and where this is provided for in the application in Table 7.12 below. |
| Policy Objective GIB29: Nature Based Solutions | It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species | The proposed surface water management strategy for the scheme incorporates SUDs techniques and NBS insofar as practicable at the site. |
| Policy Objective GIB2: Landscape Character Areas | <i>"It is a Policy Objective to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County's landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the 'Draft Guidelines for Landscape and Landscape Assessment' (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with 'A National Landscape Strategy for Ireland – 2015-2025'. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage, and the Gaeltacht's National Landscape Strategy for Ireland, 2015 - 2025.</i> | A <i>Landscape and Visual Assessment</i> has been prepared by Park Hood and accompanies the application as part of the EIAR, which concludes, that while the proposed development will have impacts on the landscape character and visual amenity of the application site, there will also be long term benefits created by the development including increased public access to Bray town centre and seafront for the wider community, managed habitats to encourage biodiversity improvement, formal recreation facilities and an increased awareness of the landscape and cultural features on the site. |
| Policy Objective GIB6: Views and Prospects | <i>It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects."</i> | A <i>Landscape and Visual Assessment</i> has been prepared by Park Hood and accompanies the application as part of the EIAR. No significant adverse impacts are identified. |
| Policy Objective GIB19: Habitats Directive | <i>"It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the</i> | The planning application includes an EIAR which <i>inter alia</i> examines the ecological impacts of the |

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| | <i>Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines."</i> | proposed development and sets out all appropriate mitigation / avoidance measures. An appropriate assessment screening has been undertaken and a NIS prepared by Atkins is enclosed as part of this application. |
| Policy Objective OSR2: Hierarchy of Parks and Open Space | <i>"It is a Policy Objective to provide a hierarchy of attractive parks and public open spaces, which vary in size and nature, are all inclusive, by being readily accessible and at a convenient distance from people's home and/or places of work."</i> | The proposed development provides a hierarchy of attractive public open spaces, which vary in size and nature and are adjacent to the proposed residential units. These are further detailed in the <i>Landscape Design Strategy</i> and associated drawings prepared by Park Hood Landscape Architects. Public spaces and parks are to be provided as detailed in the Harbour Point Masterplan prepared by GHA. |
| Policy Objective OSR4: Public Open Space Standards | <i>"It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2018)."</i> | Refer to Section 7.2.6 and Section 7.2.7 . |
| Policy Objective EI6: Sustainable Drainage Systems | <i>"It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS)."</i> | The Sustainable Urban Drainage System (SuDS) measure employed as part of the proposed development are broadly set out as follows: - <ul style="list-style-type: none"> • Underground attenuation. • Swales. • Tree pits. • Porous / permeable paving. • Green roofs on apartment blocks. Further details are provided in the <i>Stormwater Impact Assessment Report</i> prepared by Atkins. |
| Policy Objective EI16: Light Pollution | <i>"It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas."</i> | A <i>Public Lighting Plan</i> has been prepared by Atkins and is set out in accordance with the DLRCC requirement with all streets and public paths having appropriately levels of lighting. This is plan is included within the application and is accompanied by an Outdoor Lighting Report contained within <i>Engineering Report and Energy Statement</i> prepared by Atkins. |
| 12.2 Climate Action | <i>"An Energy Statement should be included for all applications of 1000+ sq.m. commercial development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered."</i> | The enclosed <i>MEP Engineering Report and Energy Statement</i> prepared by Atkins sets out how the buildings have been designed to improve their energy ratings and reduce their carbon emissions. |
| 12.3.3.1 Residential Size and Mix | <i>Applications received in both new residential communities and within the residual built up area shall include: Details of existing and permitted unit types within a 10-minute walk of the proposed development. A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1. A site and/or floor plans that clearly identify proposed units that: Are designed and located having regard</i> | The proposed development is within an existing town with a variety of existing housing typologies. The closest existing housing is located in Woodbrook Glen and along Corke Abbey in which there are c.510 no. 3 / 4 bedroom semi-detached units. To the south of the subject site within Bray town centre there are a large no. of varied housing types and sizes. Further detail on the existing and permitted unit types within a 10-minute walk of the proposed development is provided in the enclosed <i>Housing and Tenure Types and Mix Report</i> . |

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| | <p><i>to the needs of older people and/or persons with a disability. Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes. A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes. No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types."</i></p> <p>Table 12.1 in built up areas requires that "Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios. Minimum 20% 3+ bedroom units" (for apartments)</p> | <p>The proposed development includes 222 no. apartments and duplexes within DLRCC, made up of 99 no. 1 bed units (45%), 99 no. 2 bed units (45%), and 24 no. 3 bed units (11%).</p> <p>Excluding the build to rent proposals (Block A) the proposed development includes 60 no. apartments and duplexes within DLRCC, made up of 20 no. 1 bed units (33%), 23 no. 2 bed units (38%) and 17 no. 3 bed units (28%). As required in section 12.3.3 this proposed mix is 'generally in accordance with Table 12.1'. The one and two bed units combined is less than the general 80% maximum provision and the proportion of 3 bed units is above the 20% general minimum requirement. The proposed of one bed units only is 33% compared with the general maximum requirement of 30%. However, this deviation is not considered substantial and it is submitted remains 'generally in accordance with Table 12.1'.</p> <p>In the event however, that the Board consider the proposed number of one bed apartment units (non-BTR) within the DLR area to materially contravene the development plan, this is provided for in the <i>Statement of Material Contravention</i>.</p> <p>Of the 52 no. houses within DLR, 11 no. (21%) are 2 bed houses.</p> <p>Section 2.4 of the <i>Housing and Tenure Type and Mix Report</i> by RPS enclosed with the application identifies how the scheme addresses the needs of older people and persons with a disability. In addition, the floor plans for the proposed Blocks C and D enclosed with the application are clearly marked to show which units are fully wheelchair accessible. Section 2.5 of the <i>Housing and Tenure Type and Mix Report</i> and section 2.9 of the <i>Architectural Design Statement</i> set out how the various elements of the development have been designed with regard to the principle of adaptability. As explained in those reports, all of the houses and all of the apartments have some level of adaptability, though obviously to differing degrees. As all units offer some form of adaptability the site or floor plans submitted do not specifically identify any particular units as being capable of being adapted in the future.</p> <p>Less than 10% of the total number of units comprise of two-bedroom three-person apartment types.</p> |
| <p>12.3.3.2 Residential Density</p> | <p><i>In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document: 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009). Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020). As a general principle, and</i></p> | <p>Please see section 7.2.5 for detail of accordance with <i>Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities</i> and section 7.2.7 for detail of accordance with <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)</i>. The density proposed is appropriate given the location of the site within a large town and c. 800m from Bray Daly railway station and DART, commuter and intercity services. The proposed development is</p> |

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| | <i>on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4).</i> | also directly adjacent to the planned LUAS Green line extension to Bray town centre. |
| 12.3.4.2 Habitable Rooms | <i>The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission, including the minimum dimensions as set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018), and 'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).</i> | Please see section 7.2.7 for detail of accordance with <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)</i> . and section 7.2.4 for detail of accordance with <i>'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities'</i> |
| 12.3.4.4 Phased Development | <i>No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development.</i> | The proposed development is located within a large town, with all of the associated facilities as further described in Section 2 of this report and the enclosed EIAR. Confirmation of feasibility and design acceptance from Irish Water is included in the enclosed <i>Engineering Report</i> prepared by Atkins. The existing and planned provision of high capacity public transport services is described in the enclosed <i>Traffic and Transport Assessment</i> prepared by Atkins. The adequate provision of school places is described in the enclosed <i>School Demand and Concentration Report</i> prepared by RPS. |
| 12.3.4.7 Refuse Storage and Services | <i>Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection.</i> | Detail on refuse management is provided in the <i>Outline Operational Waste Management Plan</i> prepared by Atkins is enclosed and sets out the accordance of the proposals with the policies and guidelines issued by DLRCC.. Adequate facilities for separated waste disposal are provided for. The collection point is accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. Bin storage for housing is indicated on enclosed drawings. |
| 12.3.5.1 Dual Aspect in Apartments | <i>There shall generally be a minimum of 50% dual aspect apartments in a single scheme.</i> | 56% of apartments and duplexes within DLR are dual aspect. |
| 12.3.5.2 Separation Between Blocks | <i>All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a</i> | The enclosed <i>Architectural Design Statement</i> prepared by Glenn Howells Architects contains a description of the design approach to distances between buildings and how residential amenities are secured and provided within the scheme. In addition the Daylight and Sunlight Analysis prepared by 3D Design Bureau that accompanies shows the scheme performs well with respect to daylight and sunlight. |

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| | <p>greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.</p> | |
| 12.3.5.3 Internal Storage and External Storage | <p>Internal storage standards for apartments shall accord with, or exceed the levels outlined in Table 12.3:</p> <p>One Bedroom 3 sq.m. Two Bedroom (3 person) 5 sq. m. Two Bedroom (4 person) 6 sq. m. Three Bedroom 9 sq.m</p> <p>Storage should be additional to kitchen presses and bedroom furniture.</p> <p>Hot press/boiler space will not count as general storage.</p> <p>No individual storage room should exceed 3.5sq.m. and shall be provided within the apartment unit.</p> <p>Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.</p> | <p>Large scale external storage is not included as part of the development, as the level of residential amenity, storage space and unit sizes is considered to be sufficient to cater for the needs of residents. Block A however does include one 41sq.m. area of external storage at undercroft / basement level. Block D is proposed as previously permitted by An Bord Pleanála under Ref ABP-3111181-21 and does not include external storage space.</p> <p>While the development then does include some external storage, it is unclear if the Board will deem this provision to comply with the requirements of the Development Plan.</p> <p>No quantitative standard is prescribed by the Development Plan in respect of external storage and the requirement of section 12.3.5.3 is not that a development 'shall' or 'must' provide external storage. Rather it appears as a recommendation that it "should" be provided. In any event it is considered that the Apartment Guidelines take precedence on this matter and also similarly do not specify that such additional storage space must be provided.</p> <p>In this regard, it is considered that the proposal is in compliance with the Development Plan and the Guidelines. However, in the event that An Bord Pleanála interprets the Development Plan otherwise, the matter is considered more fully in the enclosed <i>Material Statement of Contravention</i>.</p> |
| 12.3.5.4 Penthouse Development | <p>The addition of a penthouse level – which typically consists of high quality roof level living accommodation in an apartment development – may be acceptable where living space constitutes the equivalent of one storey and is set back from the edge of the building. A penthouse level should have regard to the overall design of an apartment block and should be finished with high quality materials and not have a negative visual impact on the skyline and/or streetscape (refer also to the Building Height Strategy set out in Appendix 5).</p> | <p>The proposed development does not include a defined penthouse level. Those apartments at the highest level in the various blocks are of a high quality and do not impact negatively on the skyline or streetscape. In some instances these apartments are of a particularly high quality with generous private open space.</p> |
| 12.3.5.5 Minimum Apartment Floor Areas | <p>All apartment developments shall accord with or exceed the minimum floor areas indicated in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities</p> <p>Minimum Overall Floor Areas</p> <p>Studio 37 sq. m.</p> | <p>As detailed in the HQA prepared by Glenn Howells Architects the minimum floor areas accord with those indicated in the <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities</i>.</p> |

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| | <p>One bedroom 45 sq. m. Two bedroom (3 persons) 63 sq. m. Two bedroom (4 persons) 73 sq. m. Three bedrooms 90 sq. m.</p> | |
| 2.3.6 Build-to-Rent Accommodation | <p>All proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out within the Design Standards for New Apartments, 2018 (and any amending SPPR as appropriate). In this regard applications for proposed BTR must clearly demonstrate compliance with the guidelines and include details in relation to:</p> <ul style="list-style-type: none"> • The proposed ownership and operation by an institutional entity for a minimum period of not less than 15 years and no individual residential unit can be sold or rented separately for that period. A covenant or legal agreement shall be submitted and entered into in this regard. • Proposed residential support facilities such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc. • Proposed resident services and amenities for communal recreational and other activities by residents. <p>The quantum and scale of the proposed residential support facilities, services and amenities must have regard to and adequately support the number of future residents within the BTR scheme. BTR accommodation must comply with all apartment standards set out in Section 12.3.5.</p> <p>A derogation with regard to in-unit storage may be considered where alternative, secure storage area can be provided on-site. All proposed units must provide for private open space in the form of a balcony, terrace, winter garden or roof garden. A reduction in the area of private open space serving each unit will only be considered in instances where at least an additional 10% high quality, useable, communal and/or additional compensatory communal support facilities are provided. On-site car parking must comply with the requirements set out in Section 12.4.5.</p> <p>In all instances, the applicant shall clearly demonstrate that the BTR development is located within a 10 minute walking time from high frequency public transport routes.</p> | <p>Refer to Section 7.2.7 for accordance with <i>Design Standards for New Apartments</i>.</p> <p>Refer to elsewhere in this table for detail of accordance with Section 12.3.5 of the report.</p> <p>As detailed in the Traffic and Transport Assessment the proposed development is served by high frequency / capacity public transport services (DART & Bus).</p> |

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Table 7-12: Compliance with Policy Objective EI6 DLRCC CDP

| Policy Requirement | Application Response |
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| <p>Climate Change: All developments must apply a minimum factor of 1.2 to their drainage design and attenuation volumes to accommodate climate change.</p> | <p>20% climate change has been allowed as part of the storm drainage design and attenuation volumes. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Urban Creep: All developments must apply a factor of 1.1 to their drainage design and attenuation volumes to accommodate urban creep</p> | <p>10% Urban Creep has been allowed as part of the storm drainage design and attenuation volumes. This is noted within the storm drainage model by increasing rainfall intensities by 30% (20% cc and 10% urban creep). <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Assessment of Flood Risk: All developments require an assessment of flood risk.</p> | <p>Flood Risk Assessment included as part of the planning submission. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Utility Clash Check: The applicant must undertake a utilities clash check to ensure all utilities' vertical and horizontal separation distances can be provided throughout the scheme.</p> | <p>A clash check has been carried out using combined storm and foul modelling software (micro-drainage). The clash check also took into consideration the proposed diversion works of existing IW infrastructure and IW Local Network Reinforcement Project. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Private Drains: Where an applicant's land is crossed by a private drain, the applicant is responsible for acquiring any rights or permissions necessary.</p> | <p>N/A for this site <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Pumping of Surface Water: The pumping of surface water will be considered only on an exceptional basis.</p> | <p>N/A for this site <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Sustainable Drainage Systems (SuDS): In accordance with County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, the proposal must demonstrate that they meet the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS). The design must incorporate SuDS measures appropriate to the scale of the proposed development such as green roofs, bioretention areas, permeable paving, rainwater harvesting, swales, etc. that minimise flows to the public drainage system and maximises local infiltration potential.</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report. The proposed development meets the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems to minimise flows to the public drainage system and maximises local infiltration potential. <i>Note there is no change from the permitted scheme granted under ABP-311181-21</i></p> |
| <p>Infiltration: The applicant should submit Site Investigation Report and results, including Infiltration tests, and a plan showing the trial pits/soakaway test locations across the site. The report should address instances where groundwater, if any, was encountered during testing and its impact.</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report.</p> |
| <p>Hardstanding/Parking Areas: All proposed parking and hardstanding areas should maximise local infiltration before discharge to the surface water drainage system, via a specifically designed permeable paving/porous asphalt system, in accordance with the requirements of Section 12.4.8 of the County Development Plan 2022-2028.</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report including Appendix I - Stormwater Audit Procedure Table indicating extents of proposed parking and hardstanding areas. Extents of permeable paving is also indicated on the proposed Storm Water Layout drawings 5214419-ATK-01-ZZ-DR-CE-501 / 502</p> |
| <p>Basement: If basement carparking is provided, then all incidental run-off from the basement should be shown to drain to the foul system and not the surface water system.</p> | <p>Noted.</p> |

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| Policy Requirement | Application Response |
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| <p>Run-off Factors: Where applicants propose to use reduced run-off factors (or reduced impermeable contributing areas) for areas of their site that drain to SuDS measures these factors must be agreed with Municipal Services, preferable during the pre-planning process.</p> | <p>Noted. There is no change from the permitted scheme granted under ABP-311181-21.</p> |
| <p>Hydrological Parameters: Applicants must use site specific or local data in their Qbar, attenuation volume and surface water system design</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Discharge Rate: Surface Water discharge from a development must be restricted to 2 l/s/ha or the calculated Qbar, whichever is greater. The Qbar should be calculated using the net area drained and not the gross area of the site (i.e., red line boundary).</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Attenuation: If an attenuation system is proposed it should, where possible, not be located under the internal roads but in/under open space or parking areas. Attenuation systems must be inline. The preference is for attenuation systems that allow for infiltration and/or treatment within the site.</p> | <p>Noted, underground modular attenuation systems are provide within open space, refer to Atkins Stormwater Impact Assessment Report for further information. The location of the proposed underground attenuation systems is indicated on the proposed Storm Water Layout drawings 5214419-ATK-01-ZZ-DR-CE-501 / 502 <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Green Roof: The proposal must meet the requirements of Appendix 7.2: Green Roof Policy of the County Development Plan 2022-2028.</p> | <p>Noted, refer to proposed Green Intensive Courtyard and Extensive Roof Layout drawings 5214419-ATK-01-ZZ-DR-CE-601. The Green roof layout has been updated from the permitted scheme granted under ABP-311181-21 to allow for increased minimum requirements set out the Appendix 7.2: Green Roof Policy of the County Development Plan 2022-2028.</p> |
| <p>Interception and Treatment: The applicant must demonstrate that required interception and/or treatment of surface water run-off is achieved in accordance with GSDSDS policy. To be in compliance with GSDSDS Volume 2 Section 6.3.3 Table 6.3 Criterion 1, interception of the first 5-10mm is required. If interception of first 5-10mm can't be achieved, then treatment of first 15mm is required.</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>Stormwater Audit: A Stage 1 Stormwater Audit should be submitted as part of the planning submission.</p> | <p>DLRCC noted at pre-planning meeting with ABP that a new full Stage 1 Stormwater Audit was not required due to the minimal impact of changes with the proposed scheme when compared to the permitted scheme granted under ABP-311181-21. DLRCC requested that a letter from the Auditor be submitted as part of the current application indicating that a review had been carried out. Atkins has re-engaged with Punch Consulting Engineering to review this current application. Refer to Atkins Stormwater Impact Assessment Report Appendix J for cover letter from Punch Consulting Engineering.</p> |
| <p>Maintenance: Applicants must submit a post-construction maintenance specification and schedule for the drainage system, including SuDS measures and attenuation system to dlr for approval. This maintenance specification and schedule must be included in the Safety File</p> | <p>Noted, refer to Atkins Stormwater Impact Assessment Report chapter 9 for SuDS maintenance requirements. <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i></p> |
| <p>New Connections: Prior to submission of the planning application, the applicant must obtain the sewer network records from dlr and assess if a new connection to the public sewer is technically feasible. Slit trenches may be required the determine the exact location and invert levels. The</p> | <p>Noted, the controlled storm water discharge from catchment A (DLRCC jurisdiction) is proposed to outfall into the proposed storm water network within catchment B (WCC jurisdiction) prior to the final control discharge outfall to the Dargle River.</p> |

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| Policy Requirement | Application Response |
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| applicant may wish to consult with Municipal Services if a new connection is not self-evident. | <i>Note there is no change from the permitted scheme granted under ABP-311181-21.</i> |

7.4.2 Wicklow County Development Plan 2016 – 2022

The southern part of the site is located within the administrative area of WCC and is therefore subject to the land use policies and objectives of set out in the WCDP.

Bray is identified in the county plan core strategy as a being part of the Metropolitan Hinterland of the GDA. It is a level 1 town in the County Hierarchy. The aim is to grow the population of Bray from c. 29,000 in 2011 to c. 40,000 in 2028 with the associated growth in the number of houses by 5,378 units of 17.8% during this period.

As in the DLRCDP, the WCDP is underpinned by a number of themes including the principles of sustainable development, climate change adaptation, social inclusion and high quality design. The WCDP's overall aims and strategic direction of consolidated development, efficient use of land and integrated transport and land-use planning was formulated from a consideration of various national, regional and local documents including the NPF and RSES for the Eastern and Midland region.

The consistency of the proposed development with the WCDP is outlined in **Table 7-13**.

Table 7-13: Wicklow County Development Plan Consistency Appraisal

| WCDP | | |
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| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Residential Amenity HD2 | <i>“New housing development, above all other criteria, shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.”</i> | The proposed development includes a variety of apartment, duplex and house types including 1, 2, 3 and 4-bedroom units of varying designs. As detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects and described in Section 4 of this report the proposed development includes public and private amenity spaces and play areas for younger and older children. The site benefits from high quality existing and planned public transport provisions serving the proposed development. This ensures the development will be highly accessible to those without access to a private motor vehicle. The additional pedestrian and cycle routes proposed, including facilitating linkages with the town centre and Corke Abbey Valley Park will provide enhanced connectivity generally within the town. |
| Layout and Design HD3 | <i>“All new housing developments (including single and rural houses) shall achieve the highest quality of layout and design, in accordance with the standards set out in the Development and Design Standards document appended to this plan, which includes a Wicklow Single Rural Houses Design Guide.”</i> | The proposed development accords with this objective as demonstrated by the enclosed Glenn Howells Architects architectural drawings the <i>Housing Quality Assessment</i> and the <i>Architectural Design Statement</i> and elsewhere in Section 7 . |
| Social Housing HD4 | <i>To implement the provisions of the Wicklow Housing Strategy and in particular, to require that 10% of all zoned land developed for residential use, or for a mixture of residential and other uses, shall be devoted to social housing.</i> | In accordance with Objective HD4 of the Development Plan 34 no. units will be transferred to the Planning Authority for social and affordable housing. The location of units proposed to be transferred to meet Part V requirements are illustrated in the |

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| WCDP | | |
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| | | <p>Part V drawing prepared by Glenn Howells Architects and submitted as part of the application package.</p> <p>A summary of costings in relation to Part V along with a letter from Wicklow County Council agreeing in principle to the Part V proposals is enclosed as part of the planning application package.</p> |
| Residential Density HD5 | <p><i>“In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands. The Council reserves the right to refuse permission for any development that is not consistent with this principle.”</i></p> | <p>The proposed development comprises of 586 no. residential units in a mix of apartments, duplex and houses on a net development site area of 7.28 hectares. The density of the quarter will be 80 uph. The net site area for the calculation of density excludes part of the site subject to the land use zoning objective ‘F’ and other areas outside the immediate area of development. This is further detailed in Section 6.1. Within WCC the net density is 74 uph.</p> <p>This is an appropriate density for such a location and in accordance with more detailed guidance on the quantum of development within the former Bray Golf Course as set out in the Bray LAP.</p> |
| Community Infrastructure HD8 | <p><i>“Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents.</i></p> <p><i>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.”</i></p> | <p>The location of the proposed development, proximate to Bray town centre is such that all of the facilities within the town are easily accessible. Two new schools are located directly adjacent to the site. It is noted that significant upgrades to public transport including the Bray – City Centre Core Corridor and the LUAS extension to Bray town centre are planned and will further enhance connectivity to the subject lands.</p> <p>A number of linear parks and the Coastal Park form part of the subject application. A Market Square is also proposed. The proposed MUGA shall be made available for use by the adjacent school. A childcare facility of c. 627 sq.m with associated outdoor space is to be provided in the ground floor of Block C. A <i>Childcare Demand Analysis</i> has been prepared by RPS and is enclosed as part of the application package. Other uses proposed include a convenience store, café and commercial units. The childcare facility, convenience store and café are as permitted under ABP Ref. 3111-81.</p> <p>Further details are provided in Section 6.7 of this Report</p> |
| Housing Mix HD13 | <p><i>Apartments generally will only be permitted within the designated centres in settlements (i.e. designated town, village or neighbourhood centres), on mixed use designated lands (that are suitable for residential uses as part of the mix component) or within 10 minutes walking distance of a train or light rail station.</i></p> | <p>The proposed development including houses and apartments is located within a large town and c. 800m from Bray Daly railway station and DART, commuter and intercity services. The proposed development is also directly adjacent to the planned LUAS Green line extension to Bray town centre.</p> |
| Housing Mix HD15 and Appendix 1 | <p><i>HD15: “Within medium to large scale housing developments, a range of unit types / sizes shall be provided, including bungalows (this requirement does not apply to apartment only developments).”</i></p> | <p>The proposed development includes 1, 2 and 3-bedroom apartments and 2, 3 and 4-bedroom houses and 2 and 3-bedroom duplex of varying size and design and is located within a town which has a wide range of housing types.</p> <p>The housing typologies proposed, and the associated mix of unit sizes is consistent with the Development Plan’s objective to encourage a</p> |

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| | Appendix 1: <i>“New apartment developments will be required to include a range of unit sizes to cater for different housing needs.”</i> | wide variety of housing types, sizes and tenures which will support the establishment of sustainable, resilient residential community. Further detail on the appropriateness of the residential mix is provided in the enclosed <i>Housing and Tenure Types and Unit Mix Report</i> prepared by RPS. While bungalows are not proposed it is considered that the ground floor apartments effectively function as bungalows. This is considered further in the <i>Statement of Material Contravention</i> prepared by RPS. |
| Social and community facilities CD5 | <i>“Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/ facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.”</i> | <p>The proposed development is set within the context of a masterplan for the former Bray Golf Clubs lands. This masterplan is based on SLO 3 included within the Bray LAP.</p> <p>The detail of phasing of infrastructure in tandem with the delivery of infrastructure is set out in the <i>Harbour Point Masterplan</i> prepared by Glenn Howells Architects.</p> <p>A review of childcare, education and healthcare facilities in Bray is set out in Section 6.7 of this report.</p> <p>Phase 1 of the <i>Harbour Point Masterplan</i> forms the Coastal Quarter which will provide 586 no residential units of mixed type, size and tenure together with open spaces, walks/cycleways, a MUGA, market square, parks, playgrounds, a childcare facility, café, convenience store, commercial units and facilitates connections to the wider area including the town centre, Bray Harbour, Dargle River Walk, Corke Abbey Valley Park and coastal area. It is noted that the apartment blocks will also contain a range of residential spaces to cater for management suites, multi-use rooms, fitness suites, sky lounges and receptions.</p> |
| Childcare facilities CD24 & Appendix 1 | <p><i>“Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years.”</i></p> <p><i>Appendix 1: As a general rule 20 childcare spaces shall be provided for every 75 dwelling units. A childcare facility within a residential development shall be sited at or near the entrance/exit to the proposed development so as to allow for ease of access, drop off / pick up points.</i></p> | <p>The proposed development includes a new childcare facility at the ground floor of Block C. This facility includes a dedicated area of private open space for the use of staff and children and is also proximate to the proposed playground within the Coastal Gardens. A drop off area directly adjacent to the facility is proposed.</p> <p><i>A Childcare Demand Analysis</i> was prepared by RPS and is enclosed as part of the application package. The report provides an analysis of existing and permitted childcare facilities within a 3km isochrone of the subject site and has consideration for CSO data.</p> <p>The proposed childcare facility was previously considered to provide sufficient capacity and was permitted under ABP Ref. 3111-81.</p> |

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| | <p>• Where a large development (or a development in conjunction with other developments in an Action Plan area) comprises more than 75 units, a single large childcare facility capable of serving all proposed units (and future units) may be permissible, subject to a ceiling of 100 places (full and part time)</p> | |
| Open Space CD43 & Appendix 1 | <p>CD43: “To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix)”</p> <p>Appendix 1: “Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made”</p> | <p>15% of the site within WCC equates to 6,290 sq.m, the proposed development will deliver c. 8,457 sq.m of public open space. Additional spaces are also provided within communal gardens associated with apartment blocks and the MUGA. Incidental open spaces are not included in these figures.</p> |
| Private Amenity Space Appendix 1 | <p>The minimum size / dimensions of apartments, including amenity space sizes, should be as set out in <i>Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities</i> (as may be amended or updated during the lifetime of the plan), shall be adhered to.”</p> <p>House size Minimum private open space 1-2 bedrooms 50sqm 3+ bedrooms 60-75sqm <i>‘As a general ‘rule of thumb’, 0.64sqm of private open space shall be provided for each 1sqm of house floor area, subject to the minimum sizes specified above.’</i></p> <p>Dwellings (including own door duplexes) shall generally be provided with private open space at the following minimum rates: 1-2 bedrooms 50sqm 3+ bedrooms 60-75sqm</p> | <p>Refer to Section 7.2.7.</p> <p>Further details on proposed residential units is set out in the residential quality assessment provided within the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects and enclosed as part of the application package.</p> <p>All apartments including duplex units comply with the requirements for private open space for apartments as set out in the <i>Design Standards for New Apartments</i> which take precedence over the provisions of the Development Plan. In this regard the open space for the duplex units is as previously considered and permitted by ABP under ABP-3111181-21.</p> <p>The houses within the scheme comply with the private open space requirements of the development plan.</p> |
| Play Facilities Appendix 1 | <p>Evaluation of suitability of open space, play and recreation facilities having regard to, “2.4ha of active open space per 1,000 population, divided into: - 1.6ha outdoor play space - 0.6ha casual play spaces - 0.2ha equipped play space”</p> | <p>The proposed development provides active open space which includes both informal and formal play opportunities.</p> <p>The proposed development will deliver c. 8,457 sq.m of public open space. Additional spaces are also provided within communal gardens (2,667 sq.m) associated with apartment blocks and a MUGA and associated communal area (3,083 sq.m). Incidental open spaces are not included in these figures.</p> <p>The landscape plans and report included prepared by Park Hood Landscape Architects further detail the quality of the design.</p> |

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| Separation Distances Appendix 1 | <i>"A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms). However, this rule shall be applied flexibly".</i> | A separation distance of greater than 22m for residential development has been provided between directly opposing above ground floor windows. |
| Overlooking and Overshadowing | The overall level of development in any one area should not detract from the amenity presently enjoyed by local residents. No such sites should be located immediately adjacent to existing residential properties or be overlooked by the same | Buildings have been carefully arranged so as to minimise overlooking and overshadowing whilst also taking advantage of views. Proposed development adjacent to existing properties are for the most part 2-3 storeys to provide a gradual transition in height and prevent overlooking or excessive overshadowing Block D has been reduced from 5 to 4 storeys to minimise further overlooking. Further detail is provided in the <i>Architectural Design Statement</i> and <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects. |
| Aspect Appendix 1 | The aspect should be as set out in <i>Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities</i> . | Refer to Section 7.2.7 . |
| Internal Storage Appendix 1 | The storage should be as set out in ' <i>Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities</i> ' (as may be amended or updated during the lifetime of the plan), shall be adhered to. | Refer to Section 7.2.7 |
| Floor Area Appendix 1 | The minimum size / dimensions of apartments, including room shall be as set out in <i>Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities</i> (as may be amended or updated during the lifetime of the plan), shall be adhered to. | Refer to Section 7.2.7 . |
| Car Parking Appendix 1 - Section 1 Mixed Use and Housing Developments in Urban Areas | <p><i>2 off street car parking spaces shall normally be required for all dwelling units over 2 bedrooms in size. For every 5 residential units provided with only 1 space, 1 visitor space shall be provided.'</i></p> <p>Childcare 0.5 spaces per staff member + 1 car parking space per 10 children</p> <p>Office 5 per 100sqm floor area</p> <p>Retail 4 per 100sqm floor area</p> <p>Café 4 per 100sqm floor area</p> <p>Disabled car parking spaces shall generally be provided at a rate of 5%.</p> <p>In all car parks, car parking areas shall be constructed (including the provision of necessary wiring and ducting) to be capable of accommodating future Electric Vehicle charging points, at a rate of 10% of total space numbers.</p> | <p>The proposed rate of car parking is outlined and considered in Section 6.8 of this Report. The quantum of parking has been selected to reflect national policy and guidance specifically the Apartment Standards which seeks to reduce car parking in locations that are proximate to public transport corridors. The proposed quantum is less than that provided for in the WCDP. This is considered further in the <i>Statement of Material Contravention</i>.</p> <p>The development will provide disabled parking at an overall rate of over 5%. Further detail on disabled car parking spaces is provided in the enclosed Traffic and Transport Assessment prepared by Atkins.</p> <p>It is proposed that a minimum of 10% of all spaces will be delivered as EV Charging upfront and, in addition, all remaining spaces will be provided with the infrastructure to enable E-Charging in the future.</p> <p>66 no. E-charging spaces are proposed. Owners of properties with on-curtilage parking will be provided with the infrastructure to install E-Car charging points on the property as and when</p> |

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| | In any car park in excess of 20 spaces where public access is available, one fully functional charging point for Electric Vehicles shall be provided | required by the owner. This equates to a total of 113 no. spaces. Further detail of car parking is provided in the <i>Traffic and Transport Assessment</i> prepared by Atkins. |
| Cycle Parking Appendix 1, Section 7 Roads and Transportation | Residential 1 space per bedroom + 1 visitor space per 2 Units. | It is proposed to provide bicycle parking / storage: 2 no. bicycle dedicated spaces per house/duplex unit; Additional bicycle parking may be accommodated within house/duplex unit private open space; and In excess of 1 no. bicycle space per bedroom for residential and 1 no. bicycle space per 2 no. units for visitors will be provided in apartments. This provision exceeds the WCDP standard. |
| Energy Performance in New Buildings CC7 | <i>"It is Council policy that all new buildings will be required to meet the passive house standard or equivalent, where reasonably practicable. By equivalent we mean approaches supported by robust evidence (such as monitoring studies) to demonstrate their efficacy, with particular regard to indoor air quality, energy performance, comfort, and the prevention of surface/interstitial condensation.</i> <i>Buildings specifically exempted from BER ratings as set out in S.I. No 666 of 2006 are also exempted from the requirements of CC7. These requirements are in addition to the statutory requirement to comply fully with Parts A-M of Building Regulations."</i> | The <i>MEP Engineering Report and Energy Statement</i> and the <i>Building Lifecycle Report</i> prepared by Atkins and included in the application documentation outlines how the proposed development will comply with this policy. |
| Refuse Appendix 1 | Traditional housing layouts will normally require the inclusion of sufficient space to the side or rear of a dwelling for the storage of waste, including up to 4 wheelie bins (recyclables, glass, organic and residual waste); For terraced houses or courtyard type developments (i.e. those developments that include houses with either no / limited private gardens) and apartment developments, communal bin storage and composting areas shall be provided; | As detailed in the <i>Outline Operational Waste Management Plan</i> prepared by Atkins enclosed it is expected that residents with external access to the rear of the property will store the wheeled bins to the rear of the houses. Houses with no external rear access will store the wheeled bins to the front of the house in a covered area. Each house will have storage capacity for 2 no. 240L wheeled bins for residual waste and dry recyclable waste and 1 no. 140L wheeled bin for organic waste. It is noted that the waste service providers within the area of the proposed development do not provide domestic glass collection, and there is an extensive network of "Bring Bank" facilities (including recycling glass facilities) within the immediate area. |
| Apt Lifts Appendix 1 | The lift core design should be as set out in <i>Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities</i> . | Refer to Section 7.2.7 . |

7.4.3 Draft Wicklow County Development Plan 2022-2028

The *Draft Wicklow County Development Plan 2022-2028* (Wicklow Draft Plan) sets out the overall strategy for the proper planning and sustainable development of the county for the period between 2022 – 2028.

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Bray is identified as one of the five municipal districts within Wicklow and is classified as a Level 1 Key Town in the County Hierarchy. The population of Bray is targeted to increase from c. 29,646 to c. 40,425 in 2031 which is to be sustained through the delivery of new housing. Within Bray there is a target to deliver c. 5,062 new homes in which 165 units were completed post 2016 leaving a further 4,897 units to be completed before 2030.

As in the current WCDP, the Wicklow Draft Plan is framed by long term development objectives and is supported by a range of themes including principles of sustainable development, high quality design, social inclusion and environmental policy objectives including green infrastructure and marine planning. The Wicklow Draft Plan is consistent with higher level strategic policy documents including the NPF 2040, RSES, *Transport Strategy for the GDA 2016-2035* and the *Climate Action Plan 2019* which have all informed the development plan strategy and policy objectives.

Table 7-14: Draft Wicklow Plan Consistency Appraisal

| Draft Wicklow County Development Plan 2022-2028 | | |
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| Reference | Relevant Policy/ Objective/ Guidance | Statement of Consistency |
| Design Housing Objectives CPO 6.3 | <i>“New housing development shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.”</i> | The proposed development includes a variety of apartment, duplex and house types including 1, 2, 3 and 4-bedroom units of varying designs. As detailed in the Architectural Design Statement prepared by Glenn Howells Architects and described in Section 4 of this report the proposed development includes public and private amenity spaces and play areas for younger and older children. The site benefits from high quality existing and planned public transport provisions serving the proposed development. This ensures the development will be highly accessible to those without access to a private motor vehicle. The additional pedestrian and cycle routes proposed, including linkages with the town centre and Corke Abbey Valley Park will provide enhanced connectivity generally within the town. |
| Regional Policy Objectives RPO 4.37: | <i>“Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.”</i> | The proposed development directly addresses this objective comprising as it does a major scheme at the former Bray golf course and providing for the future delivery of the planned Luas Green Line extension. See Section 7.3.1 of this report. |
| RPO 4.41: | <i>“Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance.”</i> | The proposed development is located in Bray and within walking / cycling distance of all amenities within the town. See Section 7.3.1 of this report. |
| Settlement Strategy Objectives CPO 4.1 | <i>“To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self-sustaining growth towns, self-sustaining towns and small towns.”</i> | The proposed development will facilitate population growth in Bray, a key town, in accordance with the Core Strategy and Settlement Strategy. |

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| CPO 4.2 | <i>“To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.”</i> | The proposed development is located within Bray and shall facilitate population growth within the existing footprint of the town on lands identified as being appropriate for large scale development. |
| CPO 4.5 | <i>“To ensure that all settlements, as far as is practicable, develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.”</i> | The proposed development is located within an existing large town and adjacent to two new schools. The site is well served by existing public transport which is to be further enhanced by the extension of the Luas Green Line and Bus Connects. |
| Regeneration & Renewal | <i>“Harness the potential of the former Bray golf course, Bray harbour and key town centre development sites to deliver compact growth, prioritising sustainable mobility, expand employment opportunities and strengthen the viability and vibrancy of the town centre.”</i> | The proposed development directly addresses this, comprising as it does a major scheme at the former Bray golf course, within walking distance of the town centre. |
| Design CPO 5.21 | <i>“To strengthen the urban structure of towns and villages by ensuring that any new development contributes to a coherent urban form, focused on a high quality built environment of distinct character. New development shall incorporate a legible and permeable urban form that protects and compliments the character of the street or area in which it is set in terms of proportion, enclosure, building line, design and by the marrying of new modern architecture with historic structures.”</i> | The scheme is designed as a new urban quarter, with its own unique character and sense of place but merging seamlessly and respectfully with the existing built form of Bray town with a comparable scale and urban grain. This is further detailed in the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects |
| Social and Affordable Housing CPO 6.9 | <i>“To implement the provisions of the Wicklow Housing Strategy and in particular, to apply a 10% (or a greater percentage if provided for in future legislation) social housing requirement pursuant to Part V of the Planning and Development Act 2000 (as amended) to land zoned for residential use, or for a mixture of residential or other uses, except where the development would be exempted from this requirement.”</i> | In accordance with Objective CPO 6.9 of the Wicklow Draft Plan, 34 no. units will be transferred to the Planning Authority for social and affordable housing. The location of units proposed to be transferred to meet Part V requirements are illustrated in the Part V drawing prepared by Glenn Howells Architects and submitted as part of the application package. A summary of costings in relation to Part V is included as part of the planning application package along with a letter from Wicklow County Council agreeing in principle to the Part V proposals. |
| CPO 6.13 | <i>“To require that new residential development represents an efficient use of land and achieves the minimum densities as set out in Table 6.1 subject to the reasonable protection of existing residential amenities and the established character of existing settlements. In promoting higher densities and more compact development, new development should demonstrate compliance with: the Sustainable Urban Housing Guidelines for Planning Authorities (DEHLG 2009) and accompanying Urban Design Manual – A Best Practice Guide; Quality Housing for Sustainable Communities (DoEHLG 2007); Design</i> | Application of Table 6.1 provides for a minimum density of 50 units per hectare at the subject site. The proposed development comprises of 586 no. units in a mix of apartments, duplex and houses on a site area of 7.28 hectares with an overall gross density of the Coastal Quarter will be 80 uph. The net site area for the calculator of density excludes part of the site subject to the land use zoning objective ‘F’ and other area outside the immediate area of development. Within WCC the net density is 74 uph. This is an appropriate density for such a location and in accordance with the Wicklow Draft Development Plan. The proposed development including residential density has been guided by the cited |

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| | <i>Standards for New Apartments Guidelines for Planning Authorities (2018) Design manual for Urban Roads and Streets; and any subsequent Ministerial guidelines.”</i> | national guidelines as detailed earlier in this report. |
| CPO 6.15 | <i>“Higher density proposals should be designed to a high standard, incorporate a mix of housing types and sizes and deliver compact urban forms that enhance the local built environment and contribute towards a sustainable mix of housing options. Proposals should provide an appropriate design response to the site, be designed to a high quality and afford adequate protection for residential amenity of neighbouring properties.”</i> | <p>The proposed development includes 1, 2, 3 and 4-bedroom units of varying size and design including apartments, duplex units and houses and is located within an existing town with a variety of existing housing typologies.</p> <p>The design has responded to the topography, with building heights utilising falling ground levels and the location of the larger apartment blocks on the east of the site, enjoying sea views and having their scale accommodated by the expanse of water.</p> <p>Further information relating to the accordance of the proposed building height with good design is set out in the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects.</p> |
| CPO 6.17 | <i>To facilitate development incorporating higher buildings (i.e. buildings that exceed the contextual prevailing height) where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) or any subsequent height guidelines</i> | <p>The height of buildings proposed follows a detailed design process which has been informed by the site levels which fall from north to south across of the site, the wish to create an architectural setpiece at Market Square and the seaside location of the site.</p> <p>The proposed houses and duplexes range in height from 2 – 3 storeys with the proposed 4 no. apartment blocks ranging in height from 3 – 12 storeys.</p> <p>Further information relating to the accordance of the proposed building height with good design is set out in the <i>Architectural Design Statement</i>, prepared by Glenn Howells Architects. Details of the accordance of the proposals with Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities is provided in Section 7.2.8 of this report.</p> |
| Unit Mix CPO 6.27 | <i>“To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020).”</i> | <p>The proposed development includes 1 and 2 bedroom apartments and 2, 3 and 4 bedroom houses and 2 and 3 bedroom duplex units of varying size and design and is located within a town which has a wide range of housing types.</p> <p>The housing typologies proposed, and the associated mix of unit sizes is consistent with the Draft Development Plan’s objective to encourage a wide variety of housing types, sizes and tenures which will support the establishment of sustainable, resilient residential community. Further detail on the appropriateness of the residential mix is provided in the enclosed <i>Housing and Tenure Types and Unit Mix Report</i> prepared by RPS. Further detail on the accordance of the proposed development with <i>Design Standards for new Apartments</i> is set out in Section 7.2.7.</p> |
| Density Appendix 1 | <i>“New development should incorporate a mix of dwelling types and heights to achieve minimum densities and create interesting and attractive settlements. Large development should incorporate a mix of densities.”</i> | The proposed development comprises of 586 no. units in a mix of apartments, duplex and houses on a site area of 7.28 hectares with an overall gross density of the Coastal Quarter will be 80 uph. The net site area for the calculator of density excludes part of the site subject to the land use zoning objective ‘F’ and other area |

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| | | outside the immediate area of development. This is an appropriate density for such a location and in accordance with the Wicklow Draft Development Plan. There is variety in the built height and density throughout the site. The proposed development will introduce apartment blocks generally up to 4, 6, 8 and 12 storeys, and housing/duplex units of 2-3 storey in height |
| Density Appendix 1 | <i>“Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.”</i> | The overall density of the Coastal Quarter will be 80 uph. Within Wicklow the overall density is 74 uph. The proposed development is located within a large town and c.800m from Bray Daly railway station and DART, commuter and intercity services. The proposed development is also directly adjacent to the planned Luas Greenline extension to Bray town centre. |
| Privacy Appendix 1 | <i>“Windows and balconies shall be positioned and designed such that direct intrusion into private living areas from other dwelling units or from the public realm is avoided.”</i> | Buildings have been carefully arranged so as to minimise overlooking. Proposed development adjacent to existing properties are for the most part 2-3 storeys to provide a gradual transition in height and prevent overlooking. Block D has been reduced from 4-5 storeys to minimise further overlooking. |
| Separation Distances Appendix 1 | <i>“A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms).”</i> | A separation distance of greater than 22m for residential development has been provided directly opposing above ground floor windows. |
| Open Space Appendix 1 | <i>“Within apartment developments, private and communal amenity space shall be provided in accordance Design Standards for new Apartments (DSFNA) (2018) as amended and as may be amended in the future.</i> <i>Dwellings shall generally be provided with private open space at the following minimum rates:</i> <i>House size 1-2 bed 50 sq.m</i> <i>House size 3+ bed 60 – 75 sq.m</i> <i>Own door duplexes shall generally be provided with private open space at a minimum rate of 10sq.m per bedroom.”</i> | All private and communal amenity spaces provided are in accordance with <i>Design Standards for New Apartments (2020)</i> which have updated the 2018 guidelines. See section 7.2.7 of this report. Apartments are generally provided with the private open space per bedroom as required by Draft WCC CDP. Further details on proposed residential units is set out in the residential quality assessment provided within the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects and enclosed as part of the application package. All apartments including duplex units comply with the requirements for private open space for apartments as set out in the <i>Design Standards for New Apartments</i> which take precedence over the provisions of the Development Plan. In this regard the open space for the duplex units is as previously considered and permitted by ABP under ABP-3111181-21. The houses within the scheme comply with the private open space requirements of the development plan. |
| Public Open Space Appendix 1 | <i>“Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made”.</i> | 15% of the site within WCC equates to 6,290sq.m, the proposed development will deliver c. 8,457 sq.m of public open space. Additional spaces are also provided within communal amenity areas (c. 5,107 sq.m) |

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| | | associated with apartment blocks. Incidental open spaces are not included in these figures. |
| Car Parking CPO 12.57 and Appendix 1, Table 7.3 | <p>“New / expanded developments shall be accompanied by appropriate car parking provision.....with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 7.3 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.”</p> <ul style="list-style-type: none"> • Dwelling 1-2 bedrooms – 1.2 per unit • Dwelling 3-4 bedrooms – 2 per unit • Childcare facilities – 0.5 spaces per staff member + 1 car parking space per 10 children. • Other Retail – 4 per 100 m² gross floor area • Restaurant dining room – 10 per 100 m² gross floor area | The proposed rate of car parking is outlined in Section 6.8 of this report. The proposed quantum is less than the maximum that is provided for in the Draft Wicklow CDP, but given the location and access to public transport services is considered to be appropriate. |
| Disabled Car Parking Appendix 1 | “Disabled car parking spaces shall generally be provided at a rate of 5% of the total number of spaces, for developments requiring more than 10 car parking spaces, with the minimum provision being one space (unless the nature of the development requires otherwise)” | The development will provide disabled parking at an overall rate of over 5%.. This item is considered further in the enclosed <i>Traffic and Transport Assessment</i> prepared by Atkins. |
| Car Charging Provision Appendix 1 | <p>“Residential multi-unit buildings: Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.”</p> <p>“New (single-unit residential) buildings New ‘own door’ dwelling with car parking space located within the property boundary. Installation of recharging points for electric vehicles on site.”</p> | <p>The proposed development will provide car charging points at 10% of on street spaces and under croft parking spaces.</p> <p>This equates to 66 no. e-charging spaces. Owners of properties with on-curtilage parking will be facilitated with the infrastructure to install E-Car charging points on the property as and when required by the owner, this then equates to 113 no. car parking spaces serviced by e-charging points.</p> <p>Further details of car parking is provided in the <i>Traffic and Transport Assessment</i> prepared by Atkins.</p> |
| Cycle Parking Appendix 1 | <p>“Residential Units: 1 space per bedroom + 1 visitor space per 2 units</p> <p>Shops: 1 space for every 10 car space”</p> | <p>It is proposed to provide bicycle stores that facilitate 2 bicycles per unit in house and duplex units. Additional bicycle parking may be accommodated within house/duplex unit private open space.</p> <p>1 no. bicycle space per bedroom will be provided for apartments.</p> <p>It is proposed to provide, shop cycle parking in accordance with the Draft Wicklow Plan standards.</p> |
| Childcare Facilities | “As a general rule 20 childcare spaces shall be provided for every 75 dwelling units. A childcare facility within a residential development shall be sited at or near the entrance/exit to the proposed development so as to allow for ease of access, drop off / pick up points.” | <p>The proposed development includes a new childcare facility with capacity for 88 no. children at the ground floor of Block 1C.</p> <p>Further details of the proposed childcare facility can be found in the <i>Childcare Demand Analysis Report</i> prepared by RPS.</p> |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| Draft Wicklow County Development Plan 2022-2028 | | |
|---|--|--|
| Coastal Zone | <p>The county has been divided into coastal ‘cells’. The proposed development is located within ‘Cell 1 Bray Town’. See below the coastal cell objective for Cell 1 Bray Town:</p> <p>CPO 19.16: “To enhance the visual, recreational and natural amenities of the Bray coastal area, in accordance with the policies and objectives set out in the County Development Plan and the Local Area Plan for Bray.”</p> | <p>A Landscape and Visual Impact Assessment has been prepared by Park Hood and accompanies the application as part of the EIAR.</p> <p>The proposed development delivers new public spaces as detailed in Section 6.8 and enhanced connectivity to existing amenities.</p> <p>Accordance with County Development Plan and the Local Area Plan is set out in Section 7.4.</p> |

7.4.4 Bray Municipal District Local Area Plan 2018 – 2024

The local planning policy framework for the southern part of the site is set out in the Bray LAP. The Bray LAP has an objective to ensure that:

“development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. ‘leapfrogging’ to peripheral areas should be avoided;*
- *A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.”*

The subject lands within County Wicklow are zoned Mixed Use (MU) *“To provide for mixed use development.”* (see **Figure 7-4**). The Bray LAP goes on to state that the *“nature of the mixed use development envisaged for any particular site is set out in the text of the plan.”*

Bray LAP sets out very specific policy guidance in relation to the former Bray Golf Club lands. Objective BT2 is:

“To promote and support the development of significant new retail, retail services, commercial and cultural / community floorspace in Bray, at the following locations: - the ‘Florentine Centre’(see Objectives for ‘Opportunity Site 1’ to follow) - Former Bray golf club lands (see Objectives for SLO 3)”

The consistency of the proposed development with the Bray LAP is outlined in **Table 7-13**.

Table 7-15: Bray LAP Consistency Appraisal

| LAP | | |
|--|---|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Extension to the existing town centre SLO 3 | <i>“The lands shall be developed as an extension to the existing town centre and shall involve the creation of a number of new streets and squares, where pedestrians and non-motorised forms of transport have priority, where buildings front directly onto streets and squares with active, attractive ground floor frontage.”</i> | <p>The urban design concept upon which Harbour Point is based is intended as an extension of Bray town, including streets and public spaces and linking to it by way of the existing Dublin Road bridge to the south west, a new public transport and pedestrian bridge to the east and to the existing Bray Harbour to the south east, via the existing underpass.</p> <p>Further detail is provided in the <i>Harbour Point Masterplan</i> prepared by Glenn Howells Architects and the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects.</p> |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| LAP | | |
|--|---|---|
| Design and finish SLO 3 | <i>“The design, finishes etc of all buildings shall draw reference and inspiration from the existing traditional town centre and the development shall flow from ‘old’ to ‘new’ without jarring distortions of scale, format or design”</i> | The urban design concept upon which Harbour Point is based is intended as an extension of Bray town, echoing the existing scale and morphology of Bray. Further detail is provided in the <i>Harbour Point Masterplan</i> prepared by Glenn Howells Architects and the <i>Architectural Design Statement</i> prepared by Glenn Howells Architects. |
| Linkages SLO 3 | <i>“Excellent linkages shall be provided from the site to surrounding areas; multiple access points for both vehicles and cyclists / pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray seafront / the DART station and public walking route along the river”</i> | The subject lands can currently be accessed from the Ravenswell Road and the Dublin Road (R761) via the recently constructed school access road. Pedestrians and cyclist can also access the site from the east via the DART underpass which has been significantly enhanced from proposals under ABP Ref. 311181-21 . The proposed development facilitates an additional access point; to the north to Woodbrook Glen for pedestrians and cyclists and to the south along the Dargle Riverway. Further detail is provided by Atkins in the enclosed <i>Traffic and Transport Assessment</i> . |
| Car parking SLO 3 | <i>“Car parking shall generally to [sic] located under or within buildings; not more than 20% of the total overall parking provision required for the entire MU area may be located on open surface locations”</i> | All apartment car parking is provided at basement, undercroft or ground floor level and is not on open surface location. Further detail is provided by Atkins in the <i>Traffic and Transport Statement</i> and in the drawings Parking Allocation Sheet 1 of 2 and Sheet 2 of 2. |
| Residential density SLO 3 | <i>“The residential element shall generally be delivered in a high density format with the target provision of 1,000 units in a variety of unit sizes and formats”</i> | The subject proposals comprise 312 no. units at a net density of 74 uph in a range of 1, 2, 3 and 4 bedroom apartment and house units within WCC. The overall proposed development will provide 586 no units. This represents phase 1 of the <i>Harbour Point Masterplan</i> . If, as planned and set out in the <i>Harbour Point Masterplan</i> , phase 1 and subsequent phases will provide for in excess 1,000+ units within the administrative area of Wicklow. |
| Retail development SLO 3 | <i>“Retail development shall be integrated into the development in a manner that flows from the existing retail core of the town and brings vitality and vibrancy to the streets and squares of the new development. Retail floor space (including retail services such as restaurants, hairdressers etc) of not less than 20,000sqm (of which a minimum of 10,000sqm shall be comparison floorspace) will be required”</i> | The proposed development is located in the northern portion of the Harbour Point lands. It is planned that retail development shall be concentrated in the southern portion of the lands, thereby providing a more obvious and contiguous extension of the commercial core of Bray town. Phase 1 of the masterplan provides for the delivery of residential uses. Other uses proposed as part of this application includes a childcare facility, retail convenience store, café, commercial uses and a series of streets, plaza and open spaces. Subsequent phases of the masterplan will provide for appropriate levels of retail and other uses having regard to SLO 3. This approach has been found to be acceptable under ABP Ref. 311181-21 . |
| Non-retail commercial floor space SLO 3 | <i>“Non retail commercial floor space, such as offices, professionals services etc of not less than 5,000sqm shall be integrated into the development at both ground and above retail levels”</i> | The proposed development is located in the northern portion of the Harbour Point lands. Other uses proposed as part of this application includes a childcare facility, retail convenience store, café, commercial uses and a series of streets, plaza and open spaces. It is planned that office and other uses shall be concentrated towards the southern portion of the lands, thereby providing a more obvious and contiguous extension of the |

PLANNING REPORT & STATEMENT OF CONSISTENCY

| LAP | | |
|---|---|---|
| | | commercial core of Bray town. Phase 1 of the masterplan provides for the delivery of residential uses. Subsequent phases of the masterplan will provide for appropriate levels of office and other uses having regard to SLO 3. This approach has been found to be acceptable under ABP Ref. 311181-21 . |
| Schools / sports zone SLO 3 | <i>“The existing schools / sports zone shall be retained; excellent access shall be retained to the schools and associated sports facilities and such access shall avoid the need to bring traffic through new residential areas or town shopping streets”</i> | The proposed development does not propose any change to vehicular access to the adjacent existing schools. The provision of new pedestrian / cycle routes will enhance accessibility to the schools. Further detail is provided by Atkins in the <i>Traffic and Transport Assessment</i> . |
| Public open space SLO 3 | <i>“Not less than 2ha shall be developed as public open space”</i> | <p>The southern portion of the Harbour Point Masterplan lands will include additional open space. The master planning process has identified the opportunity of extending the Leisure / Recreation axis from the Seafront along the River Dargle. It is planned that there will be a significantly scaled Riverside Park running east west parallel to the river. This space will be provided in a subsequent phase of the overall development of the former Bray Golf Club lands.</p> <p>The proposed development represents the first phase of the Harbour Point development and provides active open space which includes both informal and formal play opportunities. The proposed development will deliver c.8,457 sq.m of public open space (areas B, C, D, E, G Table 4-6) with additional spaces provided within communal gardens (2,662 sq.m) associated with apartment blocks (B and C within WCC). A MUGA and communal amenity area (3,083 sq.m) is provided in Area H. Incidental open spaces are not included in these figures.</p> <p>The Harbour Point Masterplan provides for a ‘Landmark Building’. It is envisaged that a mixed use landmark building will be delivered in a subsequent planning application. The planned location of the future landmark building, within the subject site is indicated on Dwg BRA-GHA-SW-ZZ-DR-A-05006 prepared by Glenn Howells Architects. It is proposed to landscape this area (c. 2,782 sq.m) on a temporary basis until the mixed use landmark building is delivered. This area is not included in the c. 8,457 sq.m open space calculation</p> <p>In this regard 8,457 sq.m (or 0.8 hectares) of permanent open spaces will be provided as part of the Coastal Quarter within the administrative area of WCC.</p> <p>Together with the River Quarter (all within WCC) well in excess of 2 hectares shall be developed as public open space on lands subject to SLO 3.</p> |
| Detailed phasing programme SLO 3 | <i>“Any application shall include a detailed phasing programme that ensures the timely delivery of all elements of the SLO. In order to ‘kick start’ the development, a first phase of housing, being those units that are not integrated into the mixed use retail / commercial element, in conjunction with the public park, may be developed as a ‘Phase 1’ of the overall development, strictly on the basis of</i> | The <i>Harbour Point Masterplan</i> provides for the overall development of the former golf club lands. While the site is located within two separate administrative areas it has been designed as single development site. The delivery of the site will be realised through a series of phases permitted through separate but coordinated planning applications These phases are detailed |

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| LAP | | |
|-----------------------|--|---|
| | <i>the remaining housing being delivered in tandem with the retail / commercial element.”</i> | <p>in the <i>Harbour Point Masterplan</i>. The subject development forms phase 1 and will accommodate housing with some limited non-residential uses. This phase includes a series of open spaces containing parks, playgrounds, linear walks, tracks and cycleways. This phase also includes a multi-use games area (MUGA) which will be open to residents from the wider community and therefore a public park is being provided as part of phase 1.</p> <p>As set out in the <i>Harbour Point Masterplan</i> open spaces, including an urban park, are also proposed as part of the River Quarter. This and a range of other open spaces will be provided within subsequent applications for the delivery of Harbour Point.</p> <p>The sequence of delivery of open spaces is further discussed in the <i>Material Contravention Statement</i> prepared by RPS.</p> <p>Further detail is also provided in the <i>Harbour Point Masterplan</i> prepared by GHA.</p> |
| Housing Mix R14 | <i>“A full range of unit sizes, including smaller 2 and 3 bedrooled units shall be provided in all new housing developments (i.e. developments exceeding 4 units). Generally, no more than 50% of the units in any new development shall exceed 3 bedrooms or 120sqm in size.”</i> | <p>The proposed development comprises a mix of units including 2 and 3 bed apartments as well as 2 and 3 bed houses of difference size. The development does not exceed 50% 3 bed units.</p> <p>Further detail is provided in the <i>Housing Quality Assessment</i> prepared by Glenn Howells Architects and the <i>Housing and Tenure Type and Mix Report</i> by RPS</p> |
| Housing Density R2 | <i>“In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands. The Council reserves the right to refuse permission for any development that is not consistent with this principle. Lands zoned Residential – High Density will be expected to achieve a density of not less than 50 units / hectare.”</i> | <p>The proposed development comprises of 586 no. residential units in a mix of apartments, duplex and houses on a net site area of 7.28 hectares. The overall net density of the quarter will be 80 uph. Within WCC the net density is 74 uph.</p> <p>This is in excess of the 50 uph required and accords with specific Bray LAP policy for the former Bray Golf Course lands.</p> |
| Play Area CD2 | <i>“In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children’s play area, of a type and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council. The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.”</i> | <p>Dedicated play areas are provided for in the overall design within the podium gardens and in the communal areas. The MUGA also provides opportunities for plays and sports for older children and adults. Further details are provided in the landscape masterplan for the site prepared by Park Hood Landscape Architects.</p> |
| Play Area CD3 | <i>“All new neighbourhood parks or active open space zones shall include a ‘mixed use games area’ (MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council”</i> | <p>A mixed use games area (MUGA) is to be provided as part of the proposed development.</p> <p>Further details are provided in the landscape masterplan for the site prepared by Park Hood Landscape Architects..</p> |

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| LAP | | |
|--|--|--|
| Integration of transport and land use PT5 | <i>“To facilitate, through the zoning of land, the tie-in of new facilities with the development of land and the application of supplementary development contributions, the extension of the LUAS or other mass transit to Bray town centre, Bray train station and Fassaroe.”</i> | The proposed development is on lands appropriately zoned and adjacent to the planned LUAS Green Line extension. |
| Cycling and Walking CW1 | <i>“To improve existing or provide new foot and cycleways on existing public roads, as funding allows, and to facilitate the development of a cycling and walking amenity routes throughout the District in accordance with the NTA’s “Permeability Best Practice Guide” including foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination (be that town centre, schools, community facilities or transport nodes), while ensuring that personal safety, particularly at night time, is of the utmost priority.”</i> | The proposed development includes pedestrian / cycle routes north – south and east – west through the subject site. Linkages with Corke Abbey Valley Park, the East Coast Cycle Trail are also facilitated. Further detail is provided by Atkins in the <i>Traffic and Transport Assessment</i> . |
| Foot and cycle Links R10 | <i>“To improve existing or provide new foot and cycle links (as funding allows) at the following locations in Bray MD, and ensure developments along these routes are so designed as to allow for / not impede the delivery of required improvements: - Across the River Dargle in Bray town centre via improvements to Bray Bridge or a new pedestrian / cycle only bridge”</i> | A new bridge across the River Dargle in Bray town centre is subject to a Part 8 consent process (Reg. Ref. 21689) and the master planning and design of the subject development has been cognisant of this. Further detail is provided by Atkins in the <i>Traffic and Transport Assessment</i> . |
| Bray Golf Course Access R05 | <i>“With respect to the major development area at the former Bray Golf Course, excellent linkages shall be provided from the site to surrounding areas; multiple access points for both vehicles and cyclists / pedestrians shall be developed and in particular, the development shall include linkages through the site between the Dublin Road and Bray seafront / the DART station and public walking route along the river.”</i> | The proposed development shall be accessible from multiple points including: <ul style="list-style-type: none"> – School Access Road to the Northwest; – Ravenswell Link Road to the Southwest; – DART underpass to the east (cycle and pedestrian only); – Corke Abbey Valley Park / Woodbrook Glen to the north (cycle and pedestrian only). The proposed development includes pedestrian / cycle routes north – south and east – west through the subject site. Linkages facilitated with Corke Abbey Valley Park, the East Coast Cycle Trail. Further detail is provided by Atkins in the <i>Traffic and Transport Assessment</i> . |
| Greenways R09 | <i>“To promote and support the development of enhanced or new greenways at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links: Bray Head – Esplanade – Bray Harbour – North Beach”</i> | Proposed pedestrian and cycle linkages tie in with the DART underpass providing access to Bray Harbour and the East Coast Cycle Trail. Further detail is provided by Atkins in the <i>Traffic and Transport Assessment</i> . |

7.4.5 Bray and Environs Transport Study (2019)

The *Bray and Environs Transport Study* was prepared in 2019 following agreement between the NTA, Transport Infrastructure Ireland (TII) and WCC that such a study should be undertaken.

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The Study sets out a “preferred approach” which includes infrastructure and services which will directly serve the subject site:

- LUAS Extension to Bray Town Centre;
- Public Transport, Pedestrian and Cycle Bridge and link from the Golf Club Lands to Bray DART Station;
- Bray Core Bus Corridor Dublin Rd / M11 – N11: 3-minute AM Peak Hour frequency from DART station to City;
- DART 10-minute frequency plus 2 AM Peak Hour service inserts; and
- Implementation of the *Greater Dublin Area Cycle Network Plan*.

These and other proposals are shown in **Figure 7-5**.

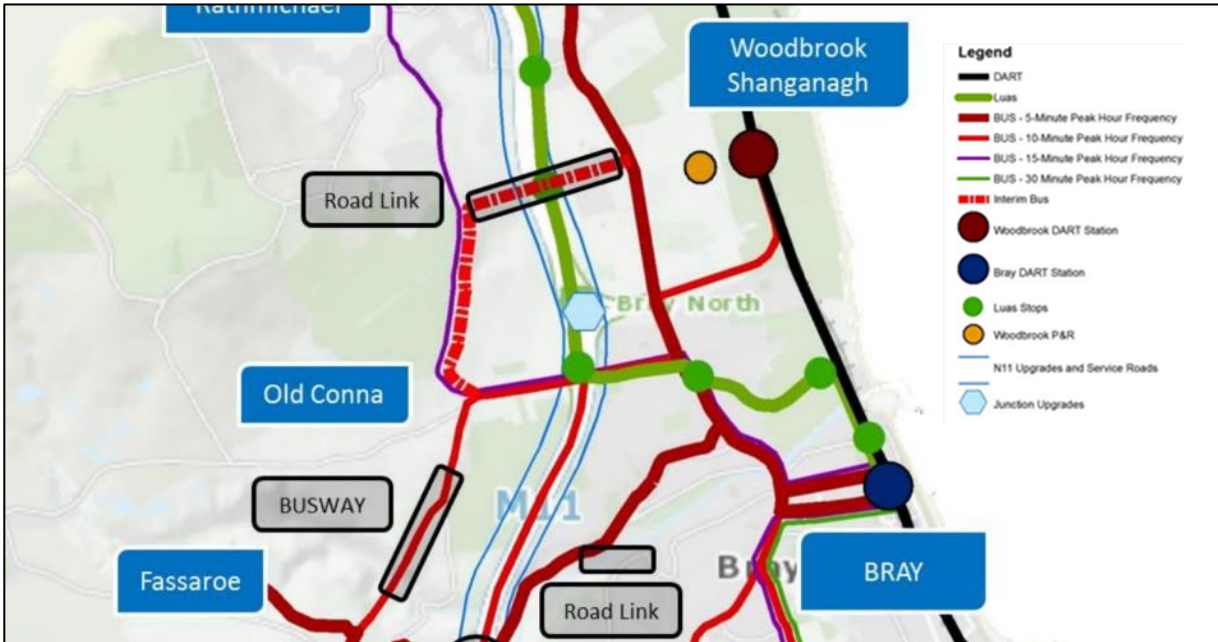


Figure 7-6: Preferred Approach 2035³

With regard to the former Bray golf course lands section 2.3.2 of the Transport Study provides more detail regarding the infrastructure considered necessary to serve the “full build-out” of the lands. The consistency of the proposed development with these requirements is outlined in **Table 7-14**.

Table 7-16: Bray and Environs Transport Study Consistency Appraisal

| Transport Strategy | | |
|------------------------------------|---|---|
| Reference | Relevant Policy / Objective / Guidance | Statement of Consistency |
| Bray Golf Club Lands Section 2.3.2 | Golf Club Lands development roads | The proposed development prioritises pedestrian and cycle linkages. The proposed network will ensure that car movement within the site will be minimised with there being no through trips. A network of vehicular roadways within the subject site are proposed and described more fully by Atkins in the <i>Traffic and Transport Assessment</i> . |
| | Pedestrian and cycle links from the Golf Club to Bray Town Centre | Pedestrian / cycling routes are proposed within the subject site, facilitating connections with the wider network including routes to Bray Town Centre, Bray Daly railway |

³ Source Figure 2.1: Preferred Approach 2035, 2019 Bray and Environs Transport Study

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| Transport Strategy | | |
|--------------------|---|--|
| | | station, Corke Abbey Valley Park and the East Coast Cycle Trail. |
| | Dublin Road bus priority (part of Bray Core Bus Corridor); | The proposed development is located c. 550m from the Bray Core Bus Corridor. The proposed development does not impact on the delivery of the project and will promote use of future services. |
| | Public transport, pedestrian and cycle bridge from the Golf Club Lands to Bray DART station for future use by LUAS; | A new bridge across the River Dargle in Bray town centre is subject to an ongoing Part 8 planning consent process (Reg. Ref. 21689). The master planning and design of the subject development has been cognisant of this. |
| | Development of interchange at Bray DART Station | The proposed development does not impact on the delivery of the project and will promote ridership on DART services. |
| | Commitment to the phased introduction of bus and enhanced rail services in line with increased demand | The proposed development though predicated primarily on pedestrian and cycle movement will generate increased demand for bus and rail services. |

8 CONCLUSION

This Planning Report & Statement of Consistency has been prepared in relation to the proposed SHD at lands at the former Bray Golf Course Lands, Bray . The proposed development will consist of the construction of 586 no. residential units, a childcare facility, café, retail unit and 1 no. commercial unit (incorporating a gym and juice bar) and high quality connections to Bray town centre, Bray Daly railway station and Corke Abbey Valley Park; and associated drainage arrangements, landscaping, boundary treatments and site development works.

The application site benefits from permission for residential-led mixed use strategic housing development under ABP 311181-21 (i.e. the consented SHD development). The principle of development such as that now proposed has been accepted in the Board's consideration of development under ABP Ref. 311181-21.

Items of concern in the Board's consideration of the previous application have been fully addressed. The proposed Blocks A and B are considerably changed from those proposed under ABP Ref. 311181-21, in order to address fully the concerns as articulated in the decision of the Board. The revised design approach adopted in this current application and the rationale for same, given its particular site context, is set out in terms of building height and design scale and mass in Sections 6.2 and 6.3 of this report and the enclosed *Architectural Design Statement* by GHA. The current proposed development also incorporates minor modifications required by a number of conditions of ABP 311181-21.

This Statement of Consistency has been prepared specifically to address the requirements of the Act of 2016 and the SHD guidance document issued by the Board. This Report illustrates how the proposed development will be consistent with the policies and objectives set out in the DLRCDP, WCDP, Draft WCDP and the Bray LAP.

This Report also set out how the proposed development will be consistent with other planning policy documents and guidelines, as appropriate and provides further details in relation to the site location and context, development description and relevant planning history.

It is submitted that the provision of a high density residential development within Bray and c. 800m north of the existing Bray Daly railway station and directly adjacent to the planned LUAS Green Line extension provides for a more compact and sustainable urban form adjacent to high capacity public transport services. The proposed development will promote a strong sense of character and place and will facilitate a safe and socially inclusive community at a highly accessible location near to all existing community, social, leisure and retail facilities within Bray. The development has been designed with respect for the existing adjacent form, layout and urban grain while encouraging individual character and a sense of belonging to a distinct place.

Having regard to this Statement of Consistency and the accompanying documentation provided as part of the submission, it is submitted that delivery of the proposed development is in the interest of proper planning and sustainable development in Bray.

STATEMENT OF CONSISTENCY

Appendix A

**Record of Meetings Wicklow County Council and Dún Laoghaire
Rathdown County Council**

STATEMENT OF CONSISTENCY

Meeting re Bray Golf Club Lands

Date of Meeting ; 22nd July 2020.

Applicant/ Agent

Alan Larkin – Reddy A&U
 Helena Gavin – RPS Group
 Kieran Rush – Ballymore
 Kieran Boyle – Atkins
 Garry Hanratty - Atkins
 Cathal Dalton – Ballymore
 Michael Prenty – Ballymore

PA / WCC

Fergal Keogh SE(PI)
 Edel Bermingham SEP
 Nicky Casey AP
 Liam Burke MD (Eng)Bray
 David Forde SEO MD Bray
 Michael Flynn SE (Roads)
 Declan O'Brien SEE

Agents – Outline/ Over view of Development Set out.

WCC –

- Indicated that in respect to development that heights and massing was similar to that permitted under previous permitted application in '07.
- It is noted that '07 permission is subject of a Section 42 time extension application at present. So that permission has not expired.
- Query raised re the access/open space along the Eastern boundary with railway.
- EIA required.
- Highlighted that they would need to assess the visual impact of the development, particularly, need to look at how it impacts visually from the Promenade in Bray. The Core Development beside the Dargle in '07 permission would have resulted in different views, but this development will now sit out on its own.
- Viewpoints Identified on drawings would appear acceptable. Previous permission CGI's showing impact on Bray Prom etc, these would be required again.
- Consider that materials are key, particularly given prominence and coastal location.
- Density would appear acceptable, although seems somewhat lower than previous permission, need to justify given core location and accessibility to Public Transport. Need to show that the 1000 units identified for the area under the SLO objective can be achieved with the remainder of the site.
- Part V - Preference by Housing Authority for Houses, but apartments will be considered where run by an Approved Housing Body. Should review Part V Guidance document which is online. Greatest

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need is for 1 to 2 bedroom units in Bray. Indicated that as there are two separate Housing lists that working in conjunction with Dún Laoghaire would not be viable with respect to Part V provision. Whilst pepper potting of houses is desired, if apartments are proposed, then Housing Authority would prefer them all together. The Part V proposal should be clear for any planning application.

- Reference made to boundary with Dún Laoghaire which sits centrally midway through a road. It was indicated that this issue, in respect of taking in charge can be agreed between the Councils
- Considered that the extent of Public OS is a concern, that the SLO objective requires the provision of a 2ha area park in first phase of development. The hard surface area for the market square is not considered to meet the POS requirements, and the area to the south appears disconnected. Highlighted by WCC that the approach to POS needs to be justified, and the approach taken should be clearly set out, and that the quality of what is being proposed will meet the needs of residents.
- Concerns raised in respect to passive surveillance of the eastern walk/ cycleway given the carpark at ground level. Need to clarify this area, and address overlooking.
- Need to clarify if ventilation in communal areas will impact on these areas in terms of usability.
- concern raised as to impact of the height of Block 1b on POS/Communal areas - a shadow analysis is required
- It was envisaged at time of permission for schools that the junction at the Ravenswell Road was temporary and would in due course to be closed off, with only cycle/ pedestrian access. PA raised concern over traffic capacity at that junction near bridge and concern with respect to pedestrian movements. Need to address pedestrian crossing and capacity of Bridge, although PA considered junction should be closed to vehicular traffic, as it was never envisaged that this access would serve major development.
- In respect of the existing temporary carpark at the bridge, this is only to be in place while the development is taking place at the Florentine Development, and this carpark is likely to close within the next year.
- The impact of extra traffic on the Willford interchange and the Dublin Road should be addressed in the assessment reports. Need to show that the existing road network is sufficient to cater for the development.
- Parking and Traffic Strategy need to be consistent, i.e. if it is being argued that public transport will be key to reducing traffic movements then the number of parking spaces may be questioned given they appear quite high. Need to show parking is not an over provision in terms of the overall transport strategy for the development.
- WCC Indicated that the Bray Transport Plan is the main transport document for development within the area, and sets out a number of measures that are required to cater for the overall development of the lands. Bray Transport Bridge is to be subject to a Part 8 consent process, and this is to be lodged soon, and may be in place when any application is made. Indicated that WCC can identify the status of all the other measures identified in the Bray Transport Plan, and the agents should liaise with Roads in respect to same.
- Indicated some internal roads concerns with regard to straightness/horizontal alignment to reduce traffic speeds. Need for DMURS audit – avoid straight stretches of road. Buildings are set back and would appear to encourage excessive speed, need to review this aspect.

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- Queried access to underground market building carparking spaces. Query re 3-storey units and parking functionality.
- The phasing needs to set out not just the numbers of houses, but what needs to be in place to allow the houses to be occupied i.e. infrastructure, OS, etc. Should also address where it veers from the SLO objective for area.
- Highlighted that the alignment of the proposed Part 8 for the Public Transport bridge is in accordance with the previous identified TII alignment for LUAS and any proposal should tie in with same.
- Review of Greater Dublin Area Transport Strategy is under way - should be completed by Feb 2022, and the outcome of this may have implications for the LUAS
- Underbridge under railway line, Irish rail only allowing pedestrian/ cycle access. Need to maintain public walkway through open space to south as link to walkway along the river.
- Drainage details discussed. Indicated that there is a lot of services in area of the proposed attenuation for southern POS area, should ensure that proposal won't impact on same
- Green roofs , need to show that they will not give rise to issues with overflowing
- Public transport bridge 25% match funding required which was agreed with the liquidator. Proposed development would be reliant on provision of Public Transport Bridge.
- Identified Statement of Consistency needs to address how it meets the SLO Objective, and should address in full any non-compliance.

STATEMENT OF CONSISTENCY

RECORD OF PRE-PLANNING MEETING FOR PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) AT FORMER BRAY GOLF CLUB LANDS.

DATE : 12th August 2020

TIME: 10.00

VENUE: Teams Meeting

REFERENCE: PAC/SHD/161/20

Present : Dún Laoghaire Rathdown County Council
Liam Walsh, Senior Planner
Cáit Ryan, Senior Executive Planner
Laura Creagh, Assistant Planner
Michael Mangan, Senior Engineer
Mary Hegarty, Senior Executive Engineer, Public Lighting
Bernard Egan, Senior Executive Engineer, Drainage Planning

External Attendees

Helena Gavin
Michael Higgins
Cathal Dalton
Alan Larkin
Mark Johnston
David McDowell
Tony Reddy
Kieran Boyle
Michael Prenty
Katie Bradshaw
Kieran Rush

[Note: The external attendees will be collectively referred to as the Applicant hereunder in the interest of clarity].

WELCOME AND INTRODUCTIONS

L. Walsh, representing the Planning Department of Dún Laoghaire-Rathdown County Council, welcomed those present. The purpose of this Pre-Planning Meeting was noted and the format of the Meeting was outlined. Meeting participants in turn introduced themselves and identified which organisation they represented at this meeting.

PROPOSED DEVELOPMENT

STATEMENT OF CONSISTENCY

The Applicant presented the proposed development as follows:

570 units proposed in overall scheme

- 278 units in Dún Laoghaire Rathdown
- 206 units in Wicklow County Council

MAIN ISSUES DISCUSSED/CONCERNS RAISED

Transportation Planning

Issues raised, and comments made as follows:

- Concern raised regarding impact of the proposed development on areas to the north, and impact on capacity of existing Old Dublin Road. Bus Connects proposals were highlighted.
- Concerns raised regarding impact on Wilford Junction and N11, and north towards Shankill. Concern also regarding impact of traffic going through Bray.
- Underpass - route available at present but outside DLR area. Confirmation needed from Irish Rail that underpass to remain open and maintained as needed.
- Public transport bridge noted – not part of this application.
- Awareness of planning history of this site is important.
 - o Previous planning conditions from ABP and previous grants of permission by DLR and Wicklow County Council (WCC) relating to the Old Dublin Road scheme
 - o Existing condition relating to access at northern part of the site
- DLR response to school application should be viewed – issues with road
- DLR would need to see more than one access into the site
- Issues of capacity/traffic in Bray at present
- Bus service is unreliable
- It must be demonstrated that proposal would not adversely impact on public transport route
- Provide connectivity

Drainage/Surface Water

Issues raised, and comments made as follows:

- Flood extents not shown on submitted drawings
- The existing extents need to be superimposed on site layouts
- No highly vulnerable development allowed in Flood Zones A and B
- Site Specific Flood Risk Assessment required
- Element with DLR to be DLRCC drainage standards and requirements
- All drainage inputs to be supported by site specific data
- Groundwater levels to be determined
- Green roof requirements as standard to be addressed

Parks and Landscape

Note: Comments provided by Planning Department

Issues raised, and comments made as follows:

- The boundary of the Pale is shown as a 'character area' on the submitted documentation. However, on the proposed site plan, it is indicated very faintly only. Details required as to what remains of the Pale boundary, and how this will be treated. This detailing should be clearly shown on the site layout, and the Pale boundary should be referenced/recognised in the scheme.
- Southern boundary of DLR lands indicated on CDP mapping to show Area of Archaeological Potential. The matter of archaeology to be addressed.
- Regarding parks and open space strategy, permeability to the indicative East Coast Cycle Trail Route and existing park/open space to the north would be important elements

STATEMENT OF CONSISTENCY

- Regarding detailing of open space, there needs to be clarity regarding the nature of the open space in the podium garden (in apartment block west of rail line). How is the podium garden accessed, and is this publicly accessible, or is it communal or private open space.
- Open space calculations for the scheme are required, which show compliance with DLR County Development Plan 2016-2022 standards and with the Apartment Guidelines (Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, March 2018)
- The relevant contact personnel in Parks and Landscape Services were provided.

Public Lighting

Issues raised, and comments made as follows:

- Position of lights – ensure good lighting where there are pedestrian and cycling routes
- Over-lighting is not necessary. Scheme should be cognisant of it being a residential development
- Home zones – unsuitable. Instead concrete pads where light can land. This is easier for future maintenance.
- Lighting circuits cannot be split between councils. Bordering lands/schemes will be fully taken in charge by one council. Decision to be made as to which Council will be responsible.

Planning Matters

Issues raised, and comments made as follows:

- Regarding building height, Appendix 9 of the CDP is relevant (Building Height Strategy). This is a sensitive site, and attention should be given to both upward and downward modifiers. Site is within 500m of the coast, coastal zone refers
- Building height guidelines (Urban Development and Building Heights – Guidelines for Planning Authorities, December 2018) – Justification for building height proposed close to coast required.
- Proposed density was noted
- Concern raised regarding interface between eastern elevation of Block 1A and open space directly to the east – how will this elevation be treated at ground floor level.
- Regarding Apartment Guidelines (2018), all relevant standards/SPPRs to be taken into account. As a general comment, minimum 50% true dual aspect apartments required. In terms of detailing, care to be taken that undue overlooking from corner apartment units facing the inner courtyards into neighbouring apartments is avoided.
- Childcare facilities – Childcare proposal within WCC part of overall scheme is noted. Analysis for basis of childcare provision (relevant calculations) required. While noted that the childcare provision is located within WCC, concern raised regarding quantum of outdoor play area associated with the facility.
- 'F' - Open Space zoning with the site and to the north of the site was raised. Remove residential and ancillary from the 'F' zoning.

Part V

It was advised that correspondence relating to Part V would be provided by the Housing Department, and forwarded to the Applicant.

Waste Management

An email received from Environmental Enforcement/Waste Section in relation to the proposed development was read out. The relevant email correspondence is attached under Appendix 1.

The Applicant was also advised that clarity would be required as to whether any bring centres are proposed as part of the scheme.

STATEMENT OF CONSISTENCY

Appendix 1

From: O'Connor Dermot <doconnor@DLRCOCO.IE>

Sent: 11 August 2020 17:07

To: Ryan Cait <cryan@DLRCOCO.IE>

Subject: Re: PAC/SHD/161/20

Many thanks Cait

At this stage we would only seek that the applicant take the DLR Guidance Notes on Construction Management and on Operational Waste Management into account in preparing their detailed submission.

Our only other question would be to ask if the staging of the development will facilitate access for the residents to Shanganagh Recycling Center.

Dermot O'Connor

DLR ENVIRONMENTAL ENFORCEMENT