



STATEMENT OF PROPOSALS

Coastal Quarter SHD 2 Planning Application

IE000468
Coastal Quarter SHD 2, Bray
F01
14 September 2022

COASTAL QUARTER SHD 2 PLANNING APPLICATION

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Statement of Proposals	MH	ML	ML	26 August 2022

Approval for issue	
ML	14 September 2022

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1 INTRODUCTION

This *Statement of Proposals* report has been prepared by RPS on behalf of Shankill Property Investments Limited (the applicant) to accompany an application for permission for a proposed Strategic Housing Development (SHD) consisting of 586 no. units at lands off the Dublin Road and Ravenswell Road within the former Bray Golf Course lands, Bray, County Wicklow and County Dublin.

Following preplanning consultations with Dun Laoghaire-Rathdown County Council (DLRCC) and Wicklow County Council (WCC) under section 247 of the *Planning and Development Act, 2000, as amended*, (Act of 2000), a request to enter into pre-application consultation with An Bord Pleanála (the Board) was submitted in December 2021. The pre-application consultation meeting was then held on 6th May 2022 under case reference ABP-312257-21.

Planning permission was previously granted by Order of An Bord Pleanála (under reference ABP-311181) on part of the current application site for 234 no. residential units, a childcare facility, café and retail unit, subject to a number of conditions. The current application incorporates the entire site of that previous permission; seeking permission for those elements of the development as previously permitted under ABP-311181 as well as permission for development on those parts of the site which were previously refused permission under ABP-311181 (these comprise the proposed Blocks A and B). The pre-application consultation in respect of that previous application was under ABP-308291-20.

On 8th June 2022, the Board issued the *Notice of Pre-Application Consultation Opinion* under section 6(7) of the *Planning and Development (Housing) and Residential Tenancies Act 2016, as amended* (Act of 2016) for the proposed development, under case reference ABP-312257-21. Having regard to the above, the notice states:

“An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”

The notice outlined the issues which the Board considered should be addressed in the documents submitted that could result in it constituting a reasonable basis for an application for SHD.

This *Statement of Proposals* report has been prepared in accordance with article 297(3) of the *Planning and Development Regulations 2001-2021* (the Regulations), which states:

“Where, under section 6(7) of the Act of 2016, the Board issued a notice to the prospective applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, the application shall be accompanied by a statement of the proposals included in the application to address the issues set out in the notice.”

Those issues arising from article 297(3) of the Regulations are considered in **Section 2** of this report.

The Board also requested that specific information should be submitted with any application for permission stating *“Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”* and notes 11 no. items. Those items pursuant to article 285(5)(b) of the Regulations are considered under separate cover in a Statement of Response report prepared by RPS.

As the current application incorporates development on the site which was previously permitted under ABP-311181-21, and which was subject of pre-application with An Bord Pleanála under ABP-308291-20, we also address in **section 3** of this report the issues raised by the Board in the Opinion of ABP-308291-20.

2 ISSUES TO BE ADDRESSED (ABP-312257-21)

In its notice of 8th of June 2022, the Board set out 2 no. issues that should be specifically addressed in the application for permission in order for the documents to constitute a reasonable basis for an application under section 5(5) of the Act of 2016. The applicant's responses to these issues are set out below and cross referenced to the project team reports and drawings as necessary.

2.1 Issue 1 – Development Strategy

“(a) 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.

Response

We refer the Board to sections 1.3 – 1.5 of the *Planning Report and Statement of Consistency* by RPS enclosed with this application which explains the scope of the application and sets out the rationale for the approach adopted. These matters are also addressed hereunder.

Having given further consideration of the scope of the proposed development subject of the application and the redline boundary, we confirm that the current application seeks permission for 586 No. dwellings, a retail unit, 2 no. commercial / retail units (convenience store 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 (with regard to any relevant conditions) by ABP-311181.
- 352 no residential units, 1 No. commercial unit (incorporating a gym and a 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) 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).

The reason for including the full extent of development at the overall site within this current application is due to the fact that the pre-application procedures for this development were requested on the basis of the full site development. 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. Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016 requires that before making an request to the Board, a prospective applicant enters into pre-application consultations with the relevant planning authority / authorities in respect of 'the proposed development'. Section 5 also required that prior to making a SHD application to the Board, the prospective applicant enter into consultation with the Board in

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respect of 'the proposed strategic housing development'. Given, the formal scope of the proposed development subject of the pre-application requests and consultation, the current application under section 4 formally incorporates the full development of the site 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.

(b) Further consideration with respect to design rationale for the proposed height, density, design and character of residential units and details of the materials and finishes of the proposed development. Particular regard should be had to the previous reason for refusal on foot of SHD 311181-21 and justification of the proposal in terms of urban design such as height, scale, massing in the context of the site's location and architectural design treatment and interface with Bray seafront and the requirement to provide high quality, robust and sustainable finishes and details which seek to create a distinctive character for the development, having regard to visual amenity given the coastal and highly visible location of the site and its interface with Bray seafront."

Response

In response to the ABP split decision in respect of SHD 311181-21 the current application maintains Blocks C & D, the townhouses and the houses that comprise the 234 No. consented units to the west of the coastal quarter as previously permitted. The proposals incorporated in this current application for Blocks A and B respond to the concerns expressed by ABP in its previous refusal of these blocks that they were too monolithic and the massing too relentless.

A detailed design rationale for the proposed height, density, design and character of the overall development including in particular the current proposals for Blocks A and B is set out in the enclosed Architectural Design Statement by Glenn Howell Architects. A brief summary of the overall design approach and materials use is set out below.

In the current proposed development the design team has broken blocks A and B into 4 No. distinct architectural styles with their own unique fenestration, massing and rooflines. This approach has allowed the Design Team to create an undulation of massing from north to south, placing increased scale at the sites eastern edge along the coast where the buildings front the expanse to the Irish Sea and apartments can take advantage of the long distant views. The scale of the buildings reduces to 4 storeys to the west where Blocks A and B respond to the consented 3 storey duplexes.

On Blocks A and B's eastern elevation the facades step from 5 storeys on Block A1 located to the north eastern corner of the site (DLRCC) to 12 storeys on block B2 to the south eastern corner of the site (WCC). This stepping in scale and density from the Dun Laoghaire Rathdown side of the site to the Wicklow County Council area is consistent with the increase in density as the site gets closer to Bray town centre. The increase in height to the south east corner also represents a key marker within the overall masterplan, located on the intersecting point of Ravenswell Road and Harbour Road, this represents a key pedestrian junction when travelling east towards the harbour and north/south along the coastal walk. It is anticipated that it will be a high pedestrian trafficked area and therefore a key nodal point within the overall masterplan when viewed from the promenade and from the main street bridge.

Key to the overall design strategy of the Harbour Point masterplan is that the aesthetic design of the building should reinforce the unique and high quality of Bray Town centre. As a traditional Victorian resort town, Bray's sea-side character of pastel render colours, light colour windows, ornate metal work and granular piece-meal massing has led to an uplifting light and airy place that is off a human scale. The approach has been to build on this uplifting pastel coloured context, introducing light coloured brick to the apartment buildings and duplexes and light pastel coloured renders to the houses. This is then added to by well detailed expressive metal work to balconies and light coloured window frames. The massing of the buildings steps along with eastern façade to blocks A and B creating an informality to the four sea front buildings. The massing then steps down to the west creating a strong relationship between the house/duplex's and the two larger apartment buildings.

The approach to material finishes has been determined by two key influencers; firstly, the need for robust, easy to maintain brickwork to be used on all apartment and duplex buildings. On the smaller houses, that will be owner occupied and therefore easier to maintain, the strategy is to use pastel coloured render. The proposed render being used is a silicone through coloured render that can be easily kept clean by an

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extended brush process and will likely only need repainting every 15 years. Unlike the apartment buildings, the houses are less exposed to the easterly winds off the Irish Sea and therefore will be less prone to the effect of the coastal winds. The second key influencer to the choice of materials is the getting the development to successfully blend into the sea-side character of Bray. Central to the design philosophy to the Harbour Point masterplan is the acknowledgment that Bray is an exemplar of Irish Sea-side towns and that the Harbour Point masterplan should work with and enhance this already beautiful place. As such the use of light coloured renders and bricks will help reinforce this look and feel and create a new district that is very much part of Bray.

2.2 Issue 2 - Intensity of Development

“Further consideration and / or justification of the documents as they relate to the height, scale, massing, plot ratio, tenure mix and tenure type and overall intensity of development given the provisions of the DLRDCDP 2022 – 2028 and the Bray MD LAP 2018.”

Response

The overall proposed density at the subject scheme is 80 units/ha, which is substantially higher than the 50/ha minimum density recommended in the Sustainable Residential Densities for Urban Areas (2009). It is considered that this overall density and intensity of development is acceptable in principle at the subject site given its particular site context and circumstances. In this regard, the Coastal Quarter is within approx. 800m walking distance of a Rail Station and 700m of bus services on the Dublin Road. These public transport options provide a link to Dublin City Centre which is 20km away. The proposed development site also comprises a central urban location very close to Bray town centre and accordingly within easy walking distance (a 5 to 15 minute walking time) of the range of public services and facilities in Bray Town Centre.

Generally, the scale across the site is between two and five storeys, stepping up to seven and twelve floors when fronting onto the sea. Buildings have been carefully arranged so as to minimise overlooking and overshadowing whilst also taking advantage of spectacular views to the north, east and south.

The site planning places the taller and denser buildings along the coastal edge of the site and away from the existing schools to the west and the housing to the north west. The taller buildings along the sea frontage provide shelter from the cooler sea winds and at a location where larger scale buildings can be placed against the scale of the harbour and the expanse of the sea. This general arrangement of the site in response to its context is presented in **Figure 2.1**.

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Figure 2-1: Diagram showing Height, Density and Character of Development in Context of Site

Source: Architectural Design Strategy, Glenn Howells Architects

The Architectural Design Statement included with this application presents a detailed design rationale for this overall design response. The Statement in particular explains the genesis and rationale of the design of Blocks A and B in particular given that the rest of the development is proposed as previously permitted. The Architectural Design Statement explains the different massing and layout options considered for Blocks A and B and why the form now proposed was considered the most appropriate for the site with reference to its coastal location and also with reference to both existing and proposed development surrounding. This is described in section 1 of the Architectural Design Statement.

Section 3 of the Statement presents a Height (and massing study) of the development. In particular, it considers the design, height and massing of the proposed development with reference to the Building Height Policy of the Dún Laoghaire Rathdown County Development Plan 2022 and the Wicklow County Development Plan.

The enclosed Planning Report also assesses the proposed density and intensity of the development with reference to the provisions of the Dún Laoghaire Rathdown County Development Plan and the Bray MD LAP.

With reference to the proposed Tenure types within the development we refer the Board to the *Housing and Tenure Types Mix Report* by RPS submitted as part of this application. This report sets out the tenure types incorporated in the current proposal; the policy requirements of the Dún Laoghaire Rathdown County Development Plan 2022 – 2028, the Wicklow County Development Plan 2016 – 2022, the Draft Wicklow County Development Plan 2022-2028; and an assessment of the suitability of the tenure types proposed at the subject site.

3 ISSUES TO BE ADDRESSED (PREVIOUS OPINION OF ABP-308291-20)

In its notice of 5th February 2021 in the initial pre-application consultation for development at Coastal Quarter, the Board set out 7 no. issues that should be specifically addressed in the application for permission in order for the documents to constitute a reasonable basis for an application under section 5(5) of the Act of 2016. As the current application includes that part of the development previously permitted under ABP-311181-21, for clarity we also set out below where and how these issues are addressed in the current application (insofar as they are still relevant to the current application) and cross reference the project team reports and drawings as necessary.

3.1 Issue 1 – Design and Layout: Block C

“Further consideration / amendment or justification of the design and layout of Block 1C to provide a strong urban edge for the development, in particular the ground floor uses on the southern elevation which front onto the ‘Market Square’ and future potential Luas Line.”

Applicant’s Response

The layout of Block C as currently proposed is as previously permitted by An Bord Pleanála under Ref. 311181-21. We set out below the revisions that were incorporated into Block C in that previous application (and replicated in the current application) where were ultimately to the satisfaction of An Bord Pleanála by reason of its grant of permission.

In terms of context, the site is well located with respect to its position adjoining the town centre in Bray. The site benefits from an array of public transport services and is well connected. A number of further public transport options are planned for this area which include those directly located within the site namely connections with the public transport bridge being progressed by WCC (currently the subject of a Part 8 planning consent, (Reg. Ref. PRR 21/869) as an Urban Development & Regeneration Fund (URDF) project and the longer term objective of an extension of the Green LUAS line to Bray. Details on these initiatives are set out in the *Planning Report & Statement of Consistency* prepared by RPS and also in the *Traffic and Transport Assessment* prepared by Atkins.

In developing a framework for the former Bray Golf Lands (Harbour Point), both of these projects have been considered and facilitated within the proposed masterplan layout thereby enabling their delivery. In addition, the area is constrained by wayleaves and the applicant has gone to considerable lengths to agree a diversion with IW to enable the subject site be developed in a coherent manner, including the location of Block C. The *Harbour Point Masterplan* prepared by Glenn Howell Architects is included as part of the application. The future public transport route is illustrated in yellow on **Figure 3-1** below.

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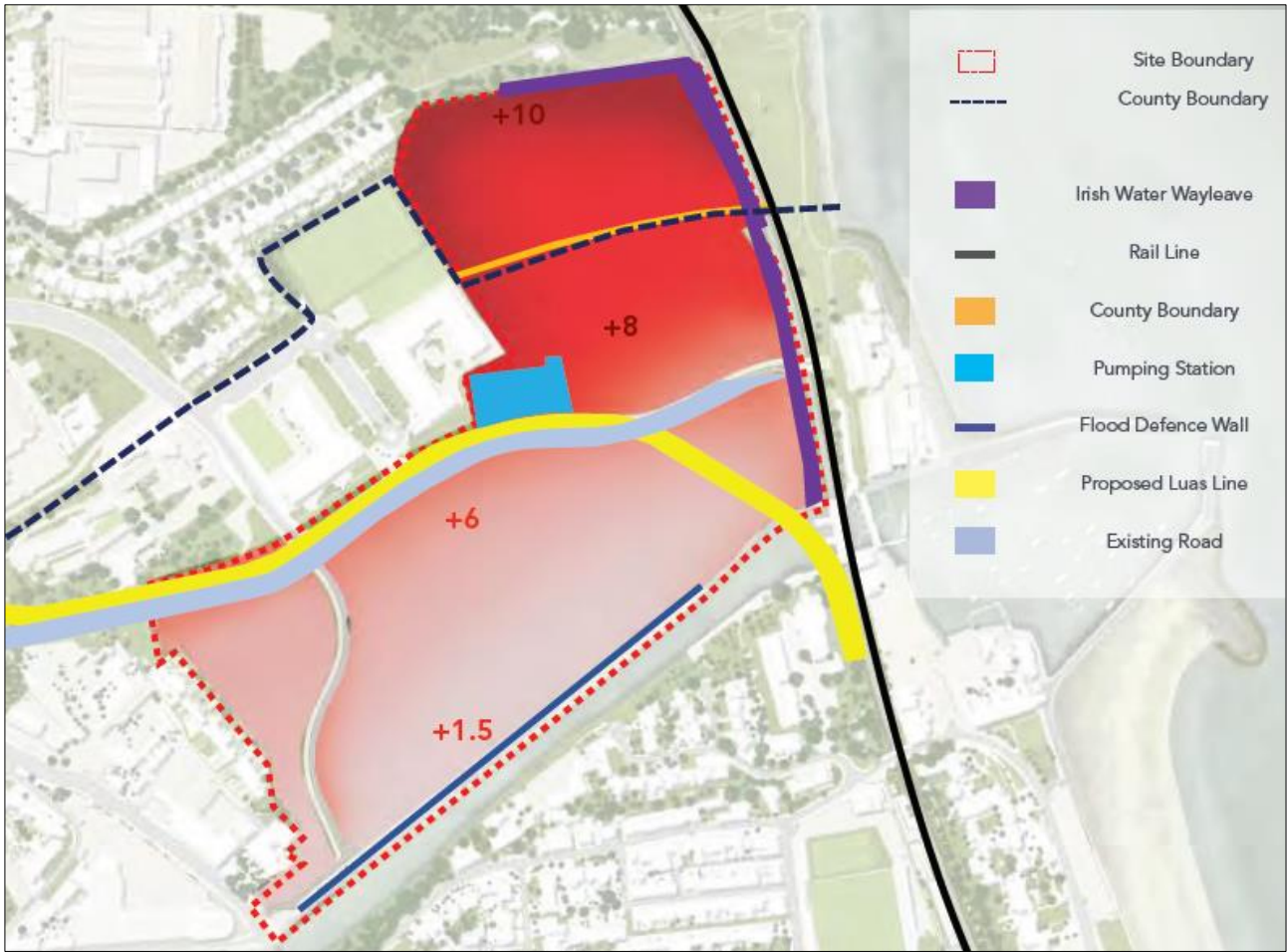


Figure 3-1: Site Considerations and Potential Luas Line
 Source: Harbour Point Masterplan Glenn Howell Architects

This future public transport link provides a natural divide to create two distinctive urban quarters, the southern area facing onto the River Dargle, the River Quarter, and the northern area facing the coast and bounded by the schools complex to the west and possessing the ability to access panoramic views over the Dart railway line to the sea and coastal areas, the Coastal Quarter.

The future public transport route and its integration within the overall masterplan is illustrated on **Figure 3-2** below.

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Figure 3-2: Potential Luas Line

Source: Harbour Point Masterplan Glenn Howell Architects

The overall layout of the Coastal Quarter comprises 4 no. apartment buildings and a range of house and duplex units. The general arrangement of the quarter is illustrated in **Figure 3-3**.

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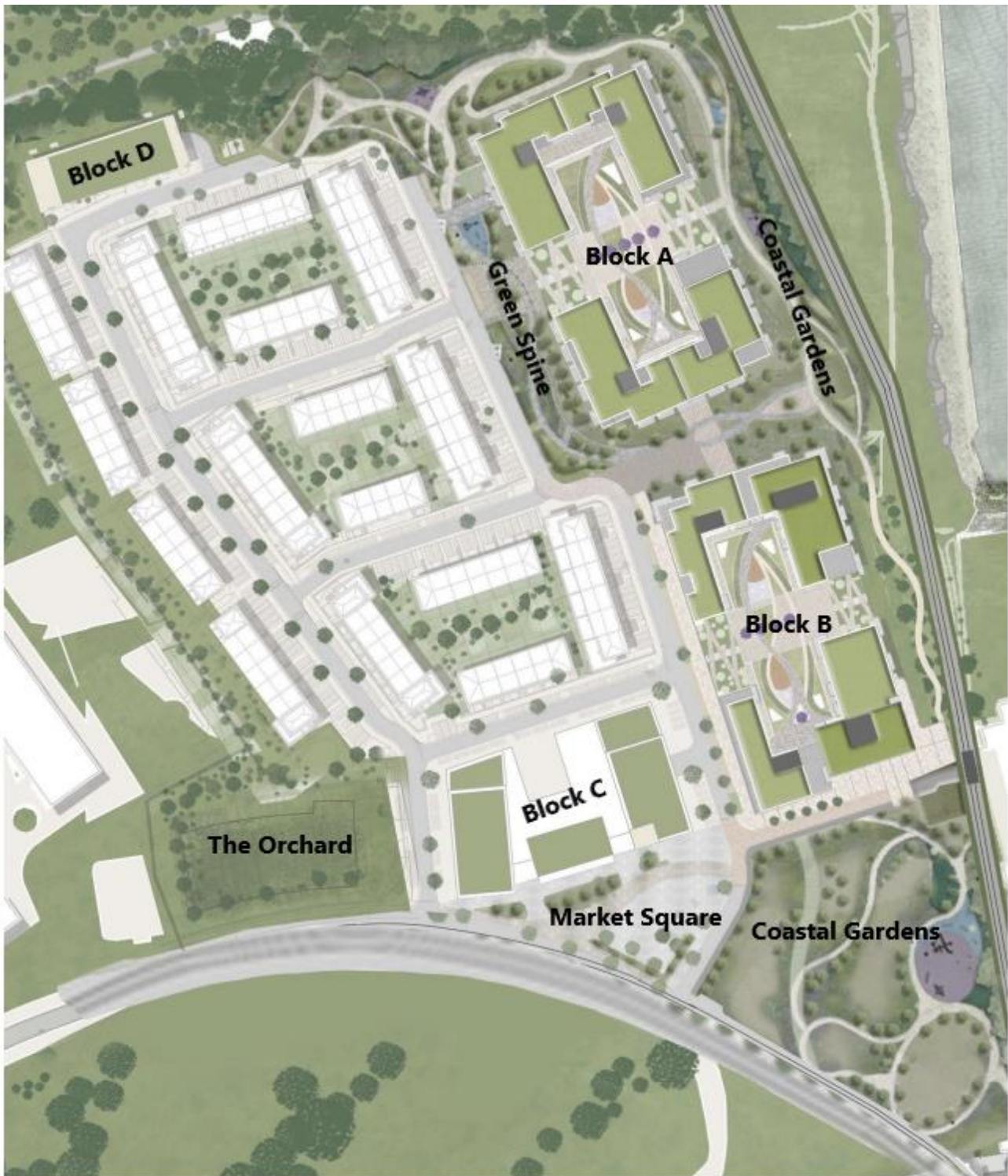


Figure 3-3: Coastal Quarter Layout

Source: Architectural Design Statement Glenn Howell Architects

The Market Square in the Coastal Quarter will be the key area of activity for the quarter with connections radiating out towards Bray Harbour and the proposed Coastal Gardens, Corke Abbey Valley Park, the proposed multi use games area (MUGA), the schools (Colaiste Raithin and Ravenswell Primary School), Dargle Boardwalk and Bray town centre via Fran O'Toole Bridge. This arrangement has also considered how the new building, Block C, and the associated open plaza and public realm will address, function and interact with the future potential Luas line in place.

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The façade of Block C which addresses Market Square was modified on foot of the Board’s notice so that the individual entrances to housing units were replaced with a retail convenience store, café and residential lobbies. The provision of a more active frontage facing onto this public meeting space to include the retail unit, café, childcare facility and apartment lobby entrances create a stronger urban edge at this key nodal point within the Coastal Quarter and the wider masterplan. This mixed use arrangement has been extended further eastwards with some commercial activity proposed on the southern elevation to Block B as well as communal residential amenity space further strengthening this east-west pedestrian route linking the development with Bray Harbour. An architectural set piece including a landmark building will be provided on the south side of Market Square and will be the subject of a future planning application. The proposed design is further addressed in the *Architectural Design Statement* prepared by Reddy Architecture and Urbanism.

The Coastal Quarter will deliver the landscaping components of Market Square and provide a pleasant southerly aspect for the active frontages along Block C. Above the ground floor uses will be apartments that overlook Market Square to provide passive supervision over the public space and animation to the façades at upper floor levels throughout the day and night. The proposed design to Market Square reflecting the function of this location is illustrated in **Figure 3-4** below and is further detailed in the *Landscape Design Strategy* prepared by Park Hood Landscape Architecture.

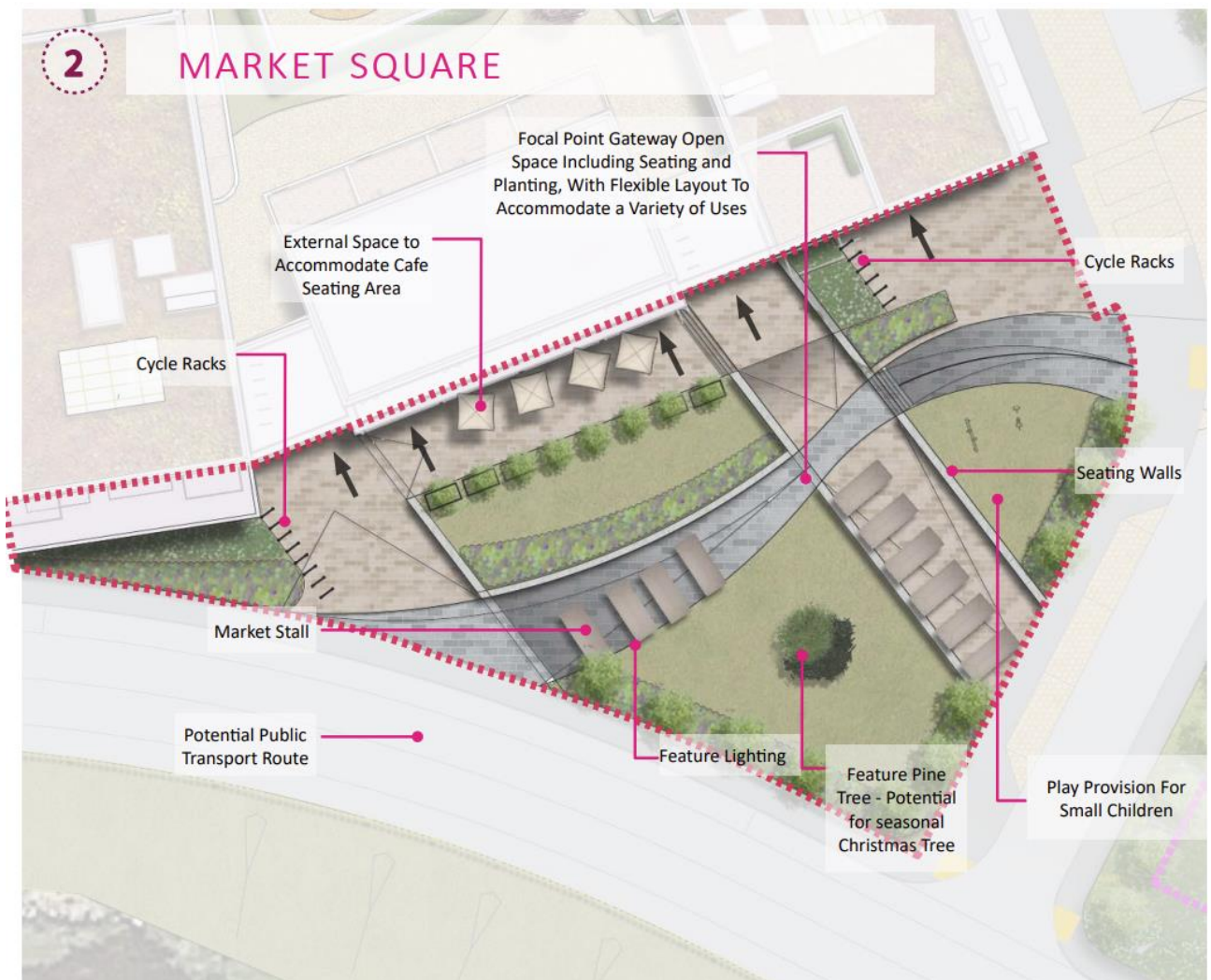


Figure 3-4: Block C and Market Square interface with Potential Luas Line

Source: Landscape Design Strategy Parkhood Landscape Architects

Once a public transport route is delivered this frontage will be situated along the pedestrian desire line between a stop and the underpass leading to the harbour, its amenities, and the coastal area.

3.2 Issue 2 – Design and Layout: Block D

“Further consideration / amendment or justification of the scale and bulk of Block 1D having regard to the residential amenities of the adjoining properties and the visual amenities of Woodbrook Glen and the open space zoning objective of lands located to the north of the site.

Applicant’s Response

The layout of Block D as currently proposed is as previously permitted by An Bord Pleanála under Ref. 311181-21. We set out below the revisions that were incorporated into Block D in that previous application (and replicated in the current application) where were ultimately to the satisfaction of An Bord Pleanála by reason of its grant of permission.

The design of the scheme responds to the constraints and opportunities of the subject site. The smaller scale housing and duplexes are located closest to the existing suburban houses at Corke Abbey and the Ravenswell Schools Complex. The larger and grander buildings are located to the east of the site and face towards the sea. These larger blocks maximise the potential of sea and mountain views, while the scale of the larger buildings against the expanse of the sea is quite modest. The overall site layout is illustrated in **Figure 2-3** above

A small proportion of the site perimeter at one location has existing housing close to the boundary. This occurs on the north west corner of the Coastal Quarter where 112 Corke Abbey shares the site boundary, and apartment building Block D is the closest building to that boundary. Following receipt of the Board’s notice under ABP 308291-21 the design was refined to include:

- Moving Block D east by 2m and south by 2m increasing the distance from the existing house to 20.5m (see **Figures 3-5 and 3-6**);
- Reducing the overall scale of Block D from 5-storeys to 4-storeys;
- Setting back the fourth floor to the west and east so as to minimise overlooking and to stepdown the building towards the neighbouring 2-storey house to the west;
- Pulling back the terrace at fourth floor level from the parapet wall to further reduce overlooking; and
- Ensuring that balconies have not been provided on the western elevation in order to minimise overlooking.
- A particular house type in which a number of first and second floor gable windows were removed was designed and placed on the end of terrace duplex apartments closest to Corke Abbey

The apartments in Block D closest to the neighbouring housing will have their primary orientation and balconies either on the north or the south elevations. Those windows facing west towards the neighbours will be smaller windows to provide the apartments with a secondary orientation. One apartment on the top floor has a west facing roof terrace but the balustrade for this terrace is set back from the buildings parapet so that there is no overlooking of the neighbours back gardens from this level. In addition to the careful placement of windows and balconies on Block D the existing trees along the boundary are retained.

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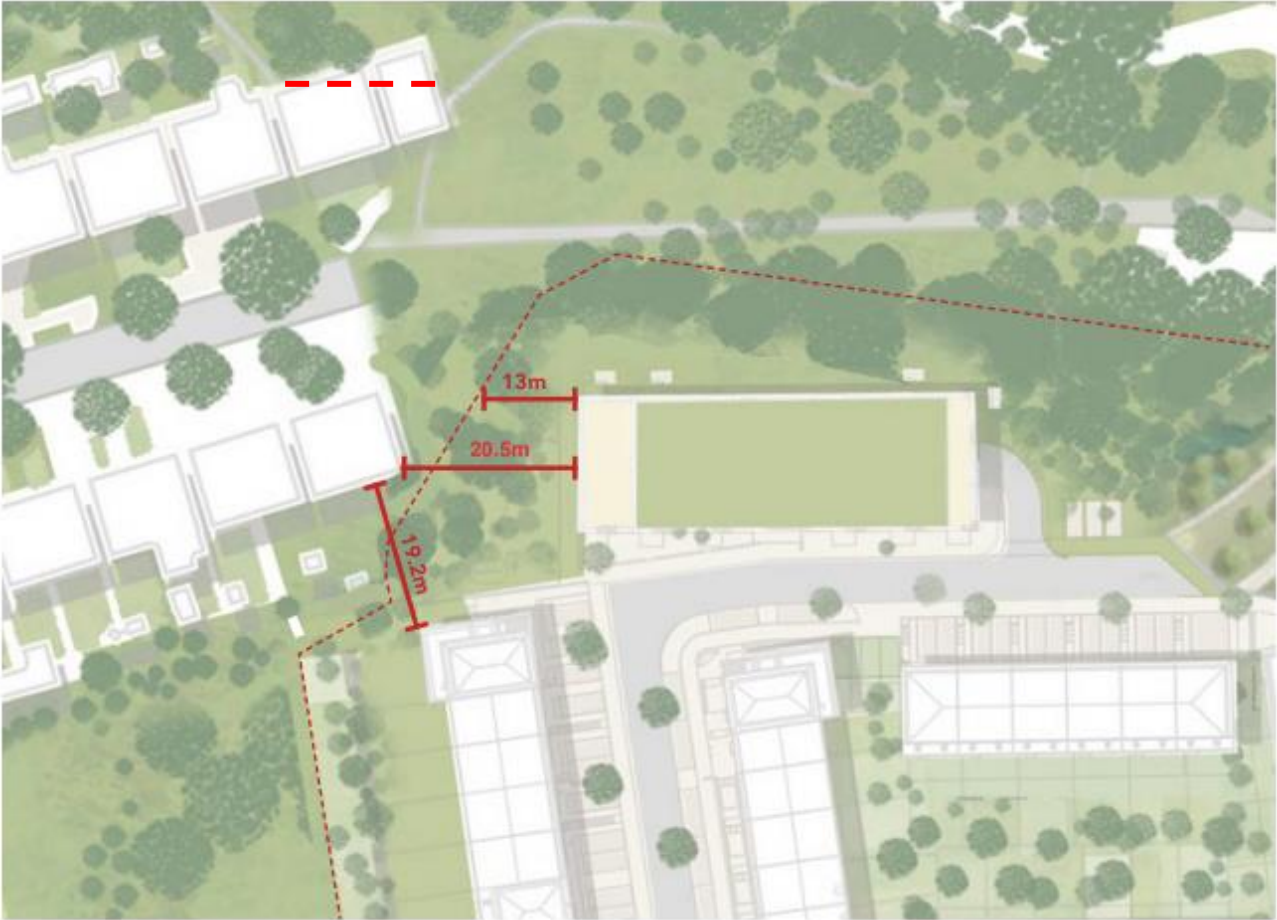


Figure 3-5: Site Layout showing distance Building 1D from Existing Development

Source: Architectural Design Statement, Glenn Howell Architects



Figure 3-6: Elevation showing distance Building 1D from Existing Development

Source: Architectural Design Statement, Glenn Howell Architects

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3.3 Issue 3 – Design and Layout: The Orchard

“Further consideration / amendment or justification of the proposed surface level car parking at ‘The Orchard’ along the southern site boundary, having regard to the proximity to existing and proposed public transport infrastructure and the potential negative impact of surface level car parking on the public realm.”

Applicant’s Response

The location of The Orchard is illustrated in the overall layout for the site on **Figure 2-3** above. The Orchard has been developed as the scheme’s ‘Mobility Hub’ and marks a key entrance to the development, designed to bring an aesthetic and usable space to what is currently a below ground waste water pumping station. This significant piece of infrastructure cannot be relocated and therefore the design intent of the scheme is to create a strong frontage on the approach to the development which helps screen the infrastructure and creates a secure location for a mobility hub containing a range of transport options to reduce reliance on private car use.

Associated with this Issue was condition No. 4(d) of the Boards permission under Ref 311181-21 which required that car parking spaces at the Orchard car park (proposed under that previous application Ref. 311181-21) 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. This revision is now provided for in the current application.

In response to conditions on the ABP 311181-21 approval, the previously proposed area of car parking has been removed and replaced with a secure location for bike rental, secure bike parking (both standard and cargo bikes), EV charging for electric bikes and provision of two GoCar spaces to facilitate car sharing. The boundary treatment has also been amended to a more visually transparent option of low brick wall and railing with a feature name sign to mark it as a primary entrance to the Coastal Quarter development.

The stone walls at the entrance to the Coastal Quarter wrap around a landscaped open space that includes:

- multi-sports play area
- dedicated dog exercise area
- informal soft landscape areas
- secure rental bike stores and a car parking area to cater for staff from the adjacent retail and crèche uses.

There is also the potential to create:

- direct access to the school by agreement to allow the multi-sports area to be used by pupils as an additional community resource for the school.

The multi-sports court and dog exercise area will be secured and retained under the control of the Owners Management Company to control access and prevent potential mis-use.

Access will be by separate controlled vehicle and pedestrian gates. The vehicle gates also allow controlled access for maintenance vehicles to access the pumping station. The area of soft landscape to the north of the car park will have full public access and will be planted with ornamental fruit trees to define the orchard character of the open space. 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. The proposed layout is illustrated in **Figure 3-7** below.

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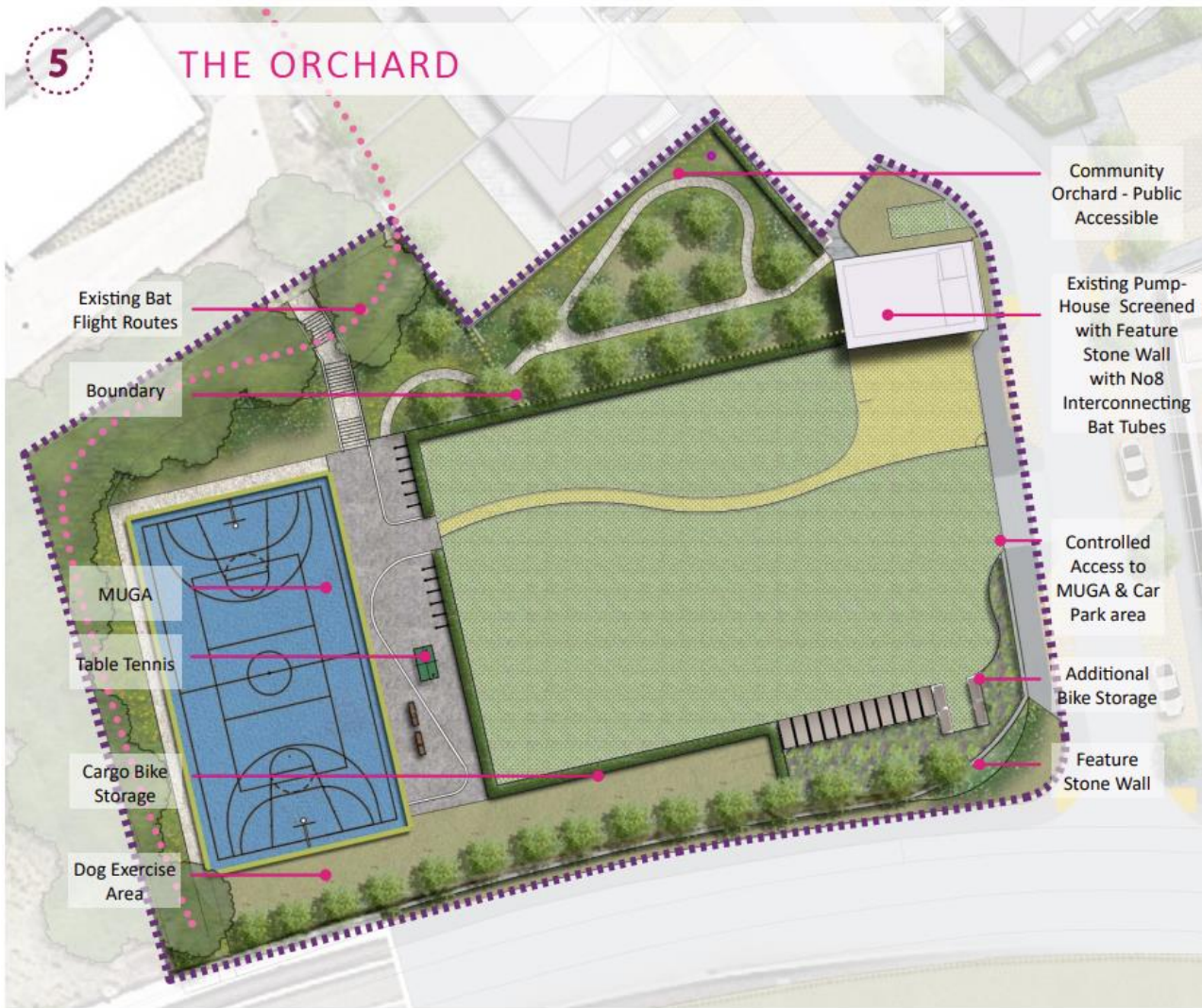


Figure 3-7: Uses Proposed within the Orchard

Source: Landscape Design Strategy Park Hood Landscape Architects

3.4 Issue 4 – Water Services: Irish Water Infrastructure

“Further consideration of the relocation of Irish Water infrastructure located underneath ‘The Orchard’ in the south west portion of the site having regard to its potential negative impact on the development potential of the site and the public realm. In the event that the infrastructure is not to be relocated then a justification should be submitted at application stage that seeks to address, inter alia, the potential negative impact on the development potential of the site and the public realm at this location.”

Applicant’s Response

Irish Water infrastructure located beneath ‘The Orchard’ is a critical piece of infrastructure associated with the Bray Pumping Station to the south of the River Dargle. It is not possible to remove this. The justification as to why this could not be moved was set out in the previous application Ref 311181-21 and accepted by An Bord Pleanála. For clarity the reasoning as to why it cannot be removed is set out again below.

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 three times per bathing season and if practical via the foul outfall to seven times per bathing season. When the storage tank

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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 Wastewater Treatment Plant. The tank was constructed by Dun Laoghaire-Rathdown County Council in 2011 – 2012. The requirements for the tank form part of the EPA licence (Ref. D0038-01) associated with the Shanganagh Wastewater Treatment Plant. Irish Water benefit from a 999 year subterranean lease for this infrastructure leaving the surface above in control of the applicant.

Following discussions with Irish Water, DLRCC and WCC with respect to the nature and function of the infrastructure, it was agreed that the infrastructure could not be moved from its current location. Instead, a design has been brought forward which maximises the quality and usability of the space, integrates this constraint into the design solution for the overall site and minimises any perceived negative impacts on the urban design and layout of the Coastal Quarter and the resulting public realm.

The features that contribute to this area of open space have been arranged to ensure full access by Irish Water and their contractors for ongoing maintenance requirements and ultimately the area will be controlled by the development management company. The entrance to the Coastal Quarter, therefore, looks to reflect the existing road boundaries on the approach to the site and extend this theme in order to screen the existence of this infrastructure where ongoing access will be required for maintenance.

The stone walls at the entrance to the Coastal Quarter wrap around a landscaped open space that includes a MUGA, a dedicated dog exercise area and an open space green area.

Minor diversion works will however be carried out to both the existing rising main and gravity return sewer within the application site boundary in order to facilitate the construction of the proposed Market Square. These works will allow Blocks C and B to address Market Square and create an integrated public realm. Works have been fully discussed and detailed with Irish Water. Irish Water has provided a confirmation of feasibility for the diversions works. This is contained in Appendix C to the *Engineering Planning Report* prepared by Atkins.

The quality of the open space and the design measures underpinning this are further detailed in the *Architectural Design Statement* prepared by Glenn Howell Architects and the *Landscape Design Strategy* prepared by Park Hood Landscape Architects.

3.5 Issue 5 - Water Services: Storm Water Management

“Further consideration / amendment or justification of the design of the storm water management proposals, including the location of attenuation tanks, having regard to existing underground infrastructure within the site and to all available flood maps / information regarding the potential for pluvial, fluvial and coastal / tidal flood risk within the site. A site-specific Flood Risk Assessment should be submitted. Further consideration of the concerns raised in the report of Dun Laoghaire Rathdown County Councils Drainage Planning Section dated 12th October 2020 and concerns raised under the Drainage section of Wicklow County Councils written opinion dated 28th October 2020.”

Applicant’s Response

The *Engineering Planning Report* prepared by Atkins sets out the proposed storm water management proposals for the site. A *Storm Water Impact Assessment* and site-specific *Flood Risk Assessment (FRA)* have also been prepared by Atkins and are submitted as part of the planning application. Points raised in the report of DLRCC dated 12th October 2020 and WCC dated 28th October 2020 and subsequent commentary under pre-application consultation process Ref. 312257 are addressed in those reports.

3.6 Issue 6 - Water Services: Foul Water Drainage

“Further consideration / amendments of the documents as they relate to foul water drainage proposals to service the development. The documents should provide details of necessary upgrade works required to facilitate the development to include, inter alia: plans and particulars, having regard to the wastewater network constraints raised by Irish Water in their report dated 22nd October 2020.”

Applicant’s Response

The *Engineering Planning Report* prepared by Atkins sets out the proposed foul water management proposals for the site. Points raised in the report of DLRCC dated 12th October 2020 and WCC dated 28th October 2020 are addressed in the *Engineering Planning Report* prepared by Atkins.

3.7 Issue 7 - Transportation

“Further consideration of the documents as they related to access and emergency access to the site. Clarity is to be provided concerning who is to deliver the proposed road network; the status of any planning and other consents required to deliver the infrastructure; the timelines involved in the delivery of the required infrastructure in the context of the proposed strategic housing development. Further consideration of the concerns raised in the report of Dun Laoghaire Rathdown County Council’s Transportation Planning Section dated 13th October 2020 and concerns raised in the report of Wicklow County Council’s Roads Section dated 15th October 2020.”

Applicant’s Response

This issue was addressed in the general layout arrangements proposed and permitted under Ref. 311181-21. The same access and emergency access arrangements as previously permitted are again proposed in this current application. These are detailed in the Traffic and Transportation Assessment report by Atkins submitted with this current application. For clarity, we set out below key provisions of how this issue was addressed in the previous proposals, and as now proposed again in the current application.

The proposed development will be accessed via 2 no. existing vehicular accesses onto the R761 (Dublin Road / Castle Street) from the Ravenswell Road Junction and from the Northern Access Road 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.

The proposed link with Bray Harbour is via an existing underpass beneath the existing rail line. The applicant can confirm that Irish Rail and WCC have concluded a license agreement allowing WCC 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 Dargle River Walk which provides high quality pedestrian and cyclist access to the Bray town centre.

No other additional consents are required for access infrastructure necessary for the delivery of this scheme. It is noted that as part of the future proofing of the site the proposed development has been designed with cognisance of the potential Luas line and proposed public transport bridge, which is now the subject of a Part 8 consent process. The Coastal Quarter is not however reliant upon the future delivery of the bridge or the Luas.

The proposed internal road network shall be provided by the applicant.

In terms of emergency access, in accordance with Sections 8.2.4.15 of Dún Laoghaire Rathdown County Development Plan an additional access for emergency use is required to be provided for developments of over 300 units on a case-by-case basis. The development is served by two vehicle access points onto the Eastern Development Road with a further fire tender access via the open space adjacent the DART Line as indicated on **Figure 3-8** below. Therefore, the development provides appropriate emergency access.

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Figure 3-8: Emergency Access Routes

Source: Traffic and Transport Assessment prepared by Atkins

In addition, a further temporary secondary emergency access point has been provided, as shown in **Figure 3-8**. This emergency access point is provided towards the south of the site and connects via a vehicle crossover with the cul-de-sac adjacent Block B and will route through the open space provision south of this, before tying in with the existing gravel path which ultimately leads to the public car park and onto the R761 Dublin Road/Castle Street. The emergency access road which routes through the open space provision will consist of reinforced grass construction and will in part overlap with the paths proposed within the open space. The landscape scheme has been designed to accommodate the emergency access and road levels can be accommodated by the existing ground levels so as not to raise levels in this flood zone area.

This proposed temporary secondary emergency access road will intersect with the alignment of the future public transport road. The need for the temporary secondary emergency access route will be replaced once the public transport bridge is built.

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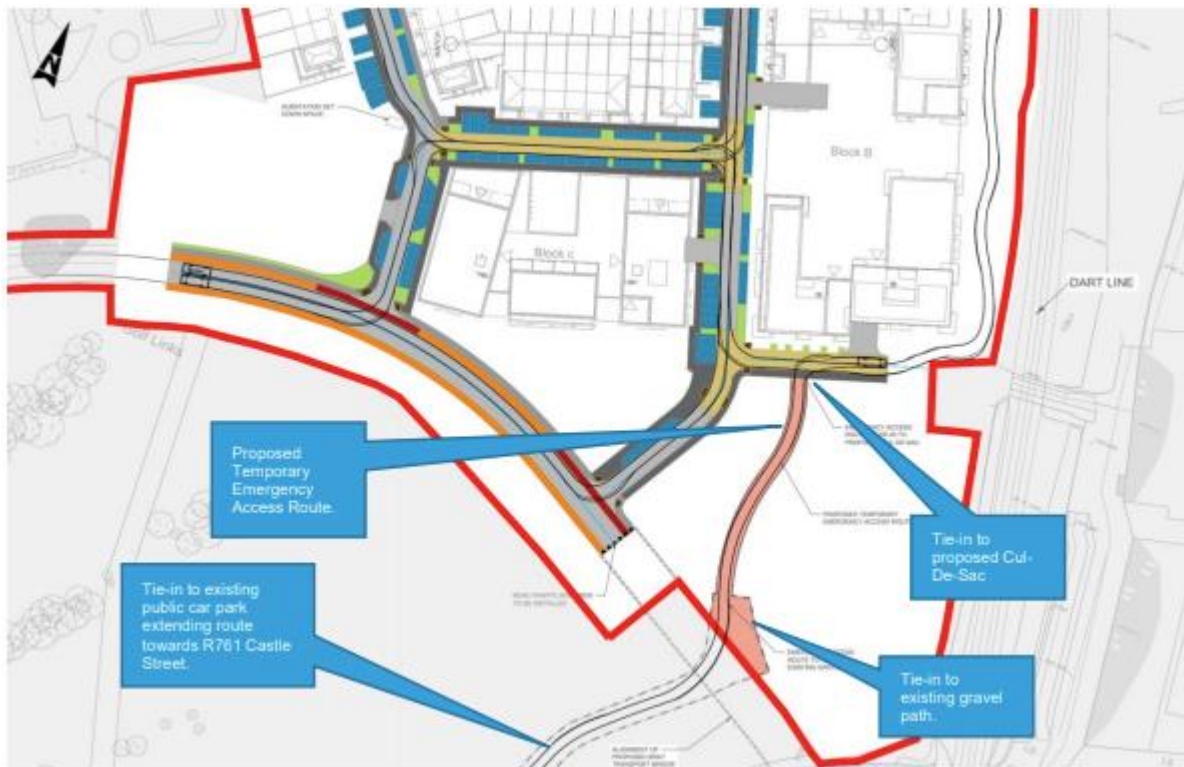


Figure 3-9: Temporary Secondary Emergency Access

Source: *Traffic and Transport Assessment prepared by Atkins*

Points raised in the report of DLRCC dated 12th October 2020 and WCC dated 28th October 2020 have been fully considered and addressed in the planning application documentation and in particular the following documents:

- *Traffic and Transport Assessment prepared by Atkins;*
- *Engineering Planning Report and drawings prepared by Atkins;*
- *Statement of Consistency with DMURS prepared by Atkins;*
- *Quality Audit (including Road Safety Audit) prepared by Atkins;*
- *Mobility Management Plan prepared by Atkins;*
- *Construction Management Plan prepared by Atkins;*
- *Taking in Charge' Dwg. No. BRA-GHA-SW-ZZ-DR-A-05007 prepared by Glenn Howell Architects; and;*
- *Public Lighting Report contained in the MEP Engineering Report & Energy Statement and layout drawing prepared by Atkins.*

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4 CONCLUSION

The foregoing clearly sets out how the Issues raised in the Opinion of An Bord Pleanála (Ref. Ref. ABP-312257-21) have now been addressed in the proposals and documentation submitted under this current application.

As the current application also incorporates the development at the site previously permitted under Ref. ABP 311181-21, for clarity this Statement of Response also confirms how the proposals and documentation submitted under this current application address the issues raised in the Opinion of An Bord Pleanála under Ref. 308291-20.

The proposed development will provide an appropriate form of high-quality residential development for this site within walking distance of Bray town centre and served by existing and planned high capacity public transport services.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area and should be permitted by the Board.