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**Planning Context Report
&
Statement of Consistency**

Stage 3 Planning Application

Proposed Strategic Housing Development

**Castle Street,
Bray, Co. Wicklow**

Applicant: Silverbow Limited

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1. Introduction

The purpose of this report is to describe the planning parameters and policy context to support the proposed development as described in plans, particulars and documents submitted with this Strategic Housing Development (SHD) application.

The development will provide a high-quality mixed-use scheme including 139 apartments in a town centre location that is well served by social infrastructure and public transport.

The development will rejuvenate a long under-utilised and partially derelict site and will provide an attractive and animated frontage to Castle Street with residential use at upper levels in accordance with the specific local planning policy objective for the site.

The sensitivities of the site, including the relationships to Dwyer Park have been carefully considered by the design team. This has been balanced against national policy objectives requiring a significant increase in density and building height within built-up urban areas.

1.1 Statutory Framework

Silverbow Limited commenced Pre-Application Consultation with An Bord Pleanála (ABP) on 8th October 2021 in respect of a proposed Strategic Housing Development comprising 139 no. residential units, 2 no. commercial units, community rooms and associated development on lands located at Castle Street, Bray, Co. Wicklow (Case Reference: ABP-311610-21).

The Tripartite consultation meeting took place on 22nd December 2021 in accordance with Section 6(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) (hereafter ‘the 2016 Act’).

On 14 January 2022, ABP issued a Notice of Pre-Application Opinion in accordance with Section 6(7)(b) of the 2016 Act. The Notice states that *ABP is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.*

Pursuant to Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the Notice includes a list of specific information that should be submitted with an application for permission. Compliance with the requirements of the Notice is demonstrated in the *Statement of Response to An Bord Pleanála Opinion* submitted with the application.

In accordance with the requirements of the 2016 Act, this report includes a *Statement of Consistency* in respect of relevant objectives of the Wicklow County Development Plan 2016-2022, the Bray Municipal District Local Area Plan 2018-2024 and relevant Section 28 Guidelines issued by the Minister.

In accordance with the requirements of 2016 Act, a separate *Material Contravention Statement* is enclosed in respect of non-compliance with height parameters contained in Bray Municipal District Local Area Plan 2018-2024.

In accordance with the transitional arrangements specified in Section 17(3)(b)(ii) of Planning and Development (Amendment) (Large-Scale Residential Development) Act 2021, the application is made within the period of 16 weeks beginning on the date on which a notice under section 6(7)(b) of the Act of 2016 is issued in relation to the proposed strategic housing development (ie. by 5th May 2022).

1.2 Consultation with Wicklow County Council

As required under Section 5(2) of the 2016 Act a formal pre-application consultation with Wicklow County Council (WCC) took place on 19 March 2021 and was represented by all relevant sections of the Planning Authority.

Following the consultation, the scheme was revised to address matters raised at the meeting.

1.2.1 Active Frontage to Castle Street

The scheme as originally presented to WCC located the childcare facility at ground floor in Block B, with frontage to Castle Street. The Planning Authority considered that this use may not provide an appropriate level of animation to the street.

The scheme was reconfigured to provide a second commercial unit at this location, with the childcare facility relocated to the rear of Block A. The proposed ground floor uses will optimise activity along the street. The vehicular entrance was also reduced in width in order to maximise the active frontage.

1.2.2 Mix of Uses

In terms of the mix of uses WCC expressed a desire for a greater mix of uses to reflect local planning policy for the site (Objective OP2 of the Bray Municipal District Local Area Plan 2018-2024). The scheme was revised to include additional commercial floorspace, with 2 commercial units addressing Castle Street. In addition, the standalone pavilion community building was introduced following the WCC consultation.

1.2.3 Stage 2 Consultation

As part of the Pre-Application Consultation with ABP, WCC issued a generally positive assessment of the proposal, noting that: -

Having regard to the size and constraints of the infill/ brownfield site; its location within Bray Town Centre, c. 900 metres from Bray Dart Station, and adjoining high frequency urban bus services; its town centre and high-density residential zoning; its accessibility to local shops and services, schools, and community facilities; and the OP2 objectives of the Bray MD LAP; it is considered that the site is suitable for a high-density mixed-use scheme.

The PA considers that the overall approach taken for the development of the site is generally acceptable. Any application should justify how all of the OP2 objectives of the Bray MD LAP are met.

The comments made by the representatives of Wicklow County Council are addressed in the enclosed *Statement of Response to An Bord Pleanála Opinion*.

1.3 Consultation on Bus Connects

As Castle Street is earmarked for public transport improvements under the Bus Connects programme, the design team has engaged extensively with Jacobs Consulting Engineers (acting on behalf of the NTA) to ensure that the proposals align with future road improvements at this location to facilitate Bus Connects.

Further details on the consultations can be found in the *Engineering Services Report* prepared by Corrigan Hodnett Consulting Engineers.

1.4 Environmental Considerations

Environmental considerations have been examined throughout the design of the proposal. The application is supported by a comprehensive suite of environmental assessments including: -

- Ecological Impact Assessment
- Construction Environmental Management Plan
- Environmental Impact Assessment Screening Report
- Appropriate Assessment Screening Report
- Section 299B Statement
- Bat Assessment

1.5 Design Team and Documentation

The application has been prepared by the following design team: -

- Simon Clear & Associates (SCA) – Planning
- Henry J. Lyons (HJL) – Architecture
- Niall Montgomery & Partners (NMP) – Landscape Architecture
- Renderare – 3D Visualization
- Arc – Visual Impact and Architectural Heritage
- Corrigan Hodnett Consulting Engineers (CHC) – Civil Engineering, Flood Risk and Construction Management
- NRB Consulting Engineers (NRB) – Transportation
- Bruton Consulting Engineers (BCE) – Road Safety Audit
- McElligott Consulting Engineers (MCE) – Lighting and Energy
- IN2 Engineering – Sunlight / Daylight and Microclimate
- FactFire – Fire & DAC
- AWN – Operational Waste Management
- Enviroguide – Environmental
- Dr. Tina Aughney – Bats
- Shanarc – Archaeology
- Aramark – Building Lifecycle and Property Management

The following information is submitted in support of the application: -

- Planning Context Report & Statement of Consistency (SCA – this document)

- Statement of Response to An Bord Pleanála Opinion (SCA)
- Material Contravention Statement (SCA)
- Social Infrastructure Audit (SCA)
- Architectural Design Statement (HJL)
- Architectural Drawings (HJL) (see Appendix 1 for drawing schedule)
- Landscape Design Statement (NMP)
- Landscape Drawings (NMP) (See Appendix 1 for drawing schedule)
- Daylight & Sunlight Analysis (IN2)
- Microclimatic Wind Analysis and Pedestrian Comfort (IN2)
- Landscape & Visual Impact Assessment (Arc)
- Outline Architectural Heritage Impact Assessment (Arc)
- Engineering Services Report (CHC)
- Site Specific Flood Risk Assessment (CHC)
- DMURS Design Statement (CHC)
- Climate Change Impact Assessment (CHC)
- Outline Construction & Demolition Waste Management Plan (CHC)
- Outline Construction Management Plan (CHC)
- Engineering Drawings (CHC) (see Appendix 1 for drawing schedule)
- Transportation Assessment Report (NRB)
- Ecological Impact Assessment (including Bat Assessment) (Enviroguide & Dr Tina Aughney)
- Outline Construction Environmental Management Plan (Enviroguide)
- Environmental Impact Assessment Screening Report (Enviroguide)
- Appropriate Assessment Screening Report (Enviroguide)
- Statement in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended (Enviroguide)
- Archaeological Impact Assessment (Shanarc)
- Operational Waste Management Plan (AWN)
- Energy Statement (MCE)
- Outdoor Lighting Report (MCE)
- External Lighting Plans (MCE)
- Fire Regulations Review (Factfire)

- Disability Access Review (Factfire)
- Building Lifecycle Report (Aramark)
- Property Management Strategy Report (Aramark)
- Part V Booklet

A full schedule of plans and reports submitted with the PAC submission is included in Appendix 1.

2. Site Location & Context

The subject site is located at the northern end of Bray Town Centre. The site is accessed from Castle Street, which forms part of the R761, the main thoroughfare running through Bray. Bray DART station is located c. 800m south-east of the site.

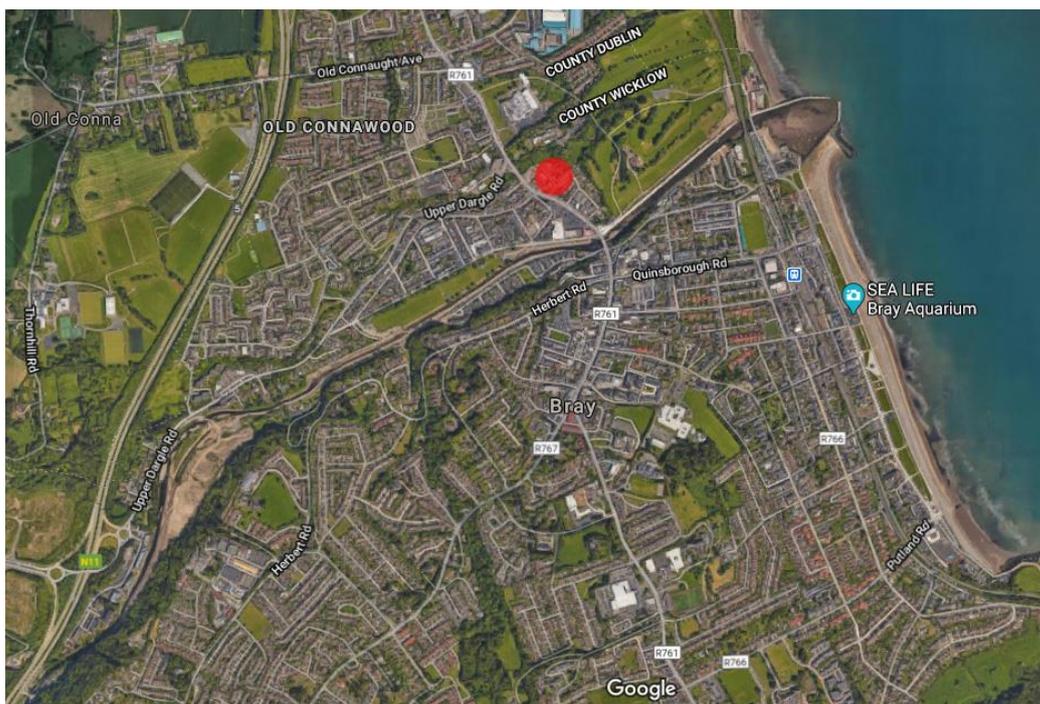


Figure 1: Aerial Context Map 1

The R761 rises northwards along the site frontage towards the Upper Dargle Road, where the junction with the Shankill (Old Dublin Road) is marked by a substantial 4-storey building set on higher ground.



Figure 2: View of substantial building at Dublin Road/Upper Dargle Road junction

The overall gross site area extends to c. 1.06 hectares and comprises the Core (Net) Site Area (hatched on the Site Location Map below) as well as sections of the surrounding public roads and footpaths to facilitate drainage infrastructure works.

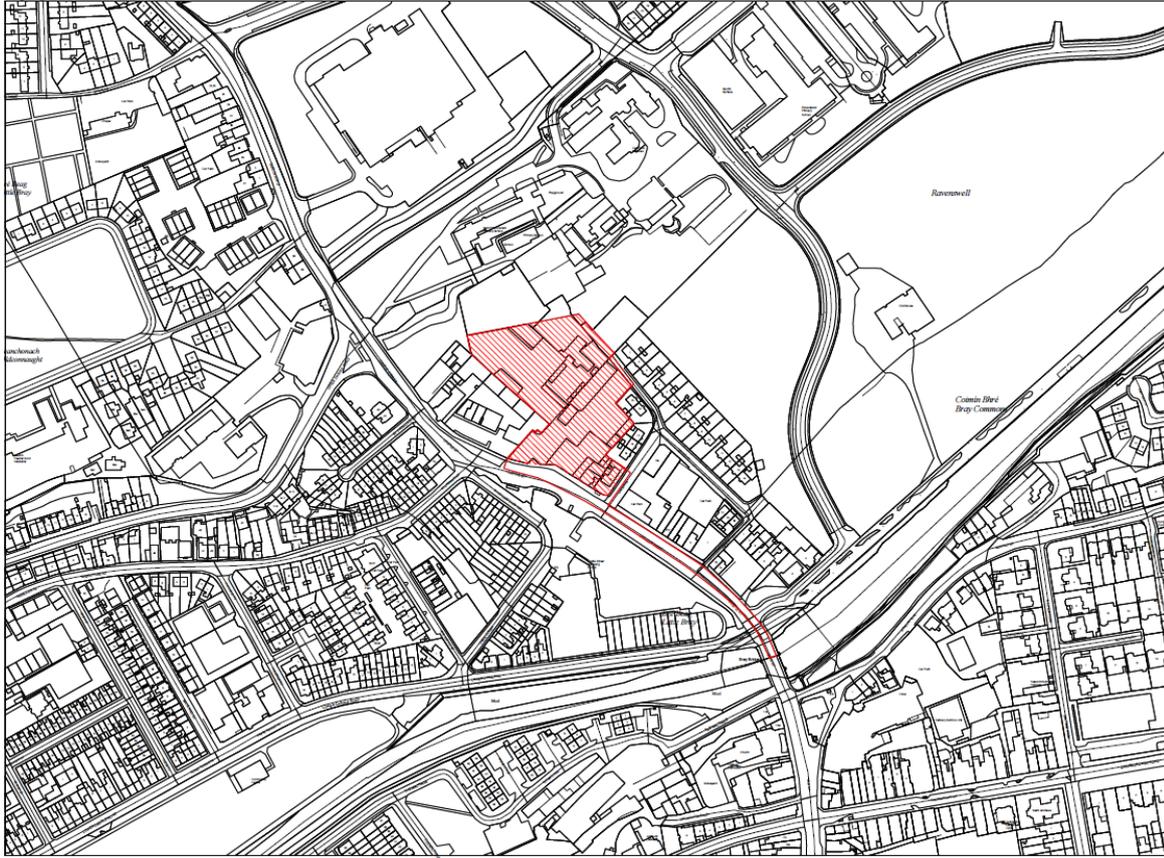


Figure 3: Site Location Map

The Core Site Area on which the proposed mixed-use development will be constructed extends to c.0.86 hectares. For the purposes of this report the ‘site’ is the core (net) site area, unless otherwise specified.

The site currently accommodates a number of vacant commercial and residential buildings. The majority of the site accommodates yards and structures associated with its former use as a builder’s merchants. The frontage to Castle Street comprises the single storey former Heiton Buckley showroom and a 2-storey vacant commercial building. The south-east corner of the site extends to Dwyer Park and accommodates a single storey dwelling (No. 20 Dwyer Park). The northern part of the site accommodates a residential property and associated outbuildings known as St. Anthony’s, which is accessed from Dwyer Park.



Figure 4: Aerial Context Map 2



Figure 5: View of site from Junction of Castle Street and Dwyer Park

The site is bounded by a mix of residential, commercial and undeveloped lands. The site occupies a frontage of c.75m to Castle Street, which forms part of the south-west boundary. The western boundary is set back from Castle Street and wraps around an adjoining commercial development accommodating warehouses and a parade of retail / service units (Dargle Centre).

To the east the site bounds the rear of residential properties at 15-19 Dwyer Park. Nos. 1-3 Dwyer Park are located to the north-east on the opposite side of Dwyer Park. To the north are undeveloped lands, including the reservation for a future access road – Southern Access Road (SAR).

Further details on community and social infrastructure in the area are contained in the enclosed *Social Infrastructure Audit*.

3. Planning History

Please refer to Appendix 2 for details of the planning history of the site.

4. Description of Development

4.1 Overview of Development

The proposed Strategic Housing Development will consist of the following:-

- Demolition of all existing vacant commercial buildings (Heiton Buckley site) and vacant residential buildings (St. Anthony's & 20 Dwyer Park) and sections of boundary wall;
- Construction of a mixed-use residential and commercial development in 2 primary blocks (A and B) ranging in height from 1 to 7-storeys set around a central, podium level amenity space and a separate single storey pavilion building along Castle Street;
- The residential element will accommodate 139 no. apartments comprising 33 no. 1-bedroom units; 91 no. 2-bedroom units; and 15 no. 3-bedroom units, with associated balconies;
- Block A (3-7 storeys) will accommodate 93 no. apartments at ground to 6th floor, with creche, bicycle store, substation, bin storage and plant rooms at ground floor;
- Block B (1-6 storeys) fronting Castle Street will accommodate 46 no. apartments at 1st to 5th floor, with 2 no. retail/non-retail service/restaurant units, communal resident's room and bin storage at ground floor level;
- The separate street level single storey pavilion building will accommodate a community facility on Castle Street;
- Vehicular access from Castle Street to 59 no. undercroft car parking spaces and 3 no. creche drop-off spaces with footpath access route to creche;
- Principal pedestrian and cyclist access from Castle Street with secondary access from Dwyer Park;;

- New surface water sewer extending along Castle Street from the site to River Dargle at Bray Bridge;
- Landscaped communal open spaces, boundary treatments, bicycle parking, signage, loading bay at Dwyer Park and all associated site works and services.

4.2 Key Development Statistics

The key development statistics for the proposal are outlined in the table below.

Table 1: Key Development Statistics

Site Statistics	
Site Area	1.06 hectares
Core Site Area	0.86 hectares
Number of Units	139
Density (139 / 0.86)	162 units per hectare
Plot Ratio	1.9
Site Coverage	58%
Open Space	1,599m ² (18.6%)
Gross Areas m²	
Gross Floor Area (excl. car parking)	16,035
Undercroft Car Park	1,734
Residential	14,967
Non-Residential	1,068
Residential Accommodation unit nos. (%)	
1-bedroom	33 (24%)
2-bedroom	91 (65%)
3-bedroom	15 (11%)
Commercial Accommodation m²	
Unit 1	284
Unit 2	404
Creche	220
Community Accommodation m²	
Community Facility	86
Community Resident's Rooms	74
Open Space m²	
Central Podium	1,029
North Garden	361
South Garden	209
Parking	
Car parking spaces	59 + 3 creche drop off
Cycle parking spaces	330

A *Housing Quality Assessment* is included in the *Architectural Design Statement* enclosed with the application, which provides details of floor areas, private amenity space and other quantitative standards for each unit.

4.3 Layout & Design

Block A is located to the rear (north) of the site and will range in height from 3-storeys opposite 1-3 Dwyer Park to 7-storeys to the north where it will interface with the future Southern Access Road (SAR). Block A will accommodate a total of 93 apartments at ground to 6th floors.

The ground floor will also accommodate a childcare facility, designed to cater for approximately 28 children. A secure external amenity space serving the creche will be located to the rear of the development at Dwyer Park. Access to the creche will be from the main Castle Street entrance.

The main entrance lobby is located on the western wing of the block with a second entrance on the eastern side next to the creche. The block is served by 2 circulation cores, which can be accessed from the external entrances or directly from the undercroft car park. The building can also be accessed at first floor level via the landscaped courtyard.



Figure 6: Roof Plan with storey heights (HJJ)

Block B is a mixed-use building addressing Castle Street and Dwyer Park. The building extends from single storey where it is closest to Dwyer Park to 6-storeys marking the entrance to the development. A separate single-storey pavilion building defines the northern side of the pedestrian entrance.

Block B will accommodate 46 apartments at 1st to 6th floors. The ground floor will provide 2 commercial units to animate the Castle Street and Dwyer Street frontages. A resident’s community room will also be provided in Block B, while the pavilion building is designated as a public community facility.

Block B is served by one circulation core, which is accessible from the main entrance and from the undercroft car park. The block can also be accessed at first floor from the landscaped courtyard.

The two blocks wrap around a central courtyard amenity space at podium level (above ground level parking).



Figure 7: CGI Aerial View of Block A (left) and Block B (right) (Renderare)

The design responds to the existing built environment, in particular the 2-storey scale of development at Dwyer Park and the greater scale at the Upper Dargle Road junction. The massing of the buildings is significantly reduced where they are closest to dwellings in Dwyer Park.



Figure 8: CGI View of Block A stepping down to 3 storeys at Dwyer Park

A detailed description of the development and rationale for the design is included in the enclosed *HJL Architectural Design Statement*.

A set of Verified Views is also enclosed, which illustrates how the proposal will sit in the existing built environment from 11 locations around Bray.

4.4 Mix of Uses

The proposal provides a mix of Residential, Commercial and Community uses, in accordance with planning objectives for the site. The principal use is Residential, which accounts for c. 93% of the floor space. A resident’s meeting room is also provided.

The 2-no. ground floor commercial units will provide for retail/non-retail service/restaurant uses, with a combined gross floor area of 688m².

The Pavilion building is designed as a community facility. It is envisaged that this will be constructed for use by a community orientated end user as a community gain, in consultation with Wicklow County Council.

4.4 Landscaping and Communal Open Space

The provision of high quality landscaped open space is an important component of the proposal. The scheme provides an interconnected series of open spaces and perimeter walkways, each designed with a distinct character. The large central courtyard space will serve as a focal point for residents, with direct access from each of the residential blocks.



Figure 9: Landscape Masterplan (NMP)

The northern garden will be heavily planted and provide a quiet amenity space for residents. A second garden space, which can be accessed from the central courtyard, will be located to the south. A Garden Walk extending from the Castle Street pedestrian entrance along the site boundary will incorporate play facilities and exercise stations.

The design also provides an attractive mix of hard and soft landscaping of the new Castle Street frontage, including opportunities for outdoor seating.

The landscape strategy is described and illustrated in detail in the enclosed *Landscape Design Statement* and associated drawings prepared by NMP.

External lighting plans for ground floor and podium level, prepared by MCE, are also enclosed.

4.5 Access & Circulation

Vehicular access to and egress from the car park will be via an undercroft entrance on Castle Street in Block B. This will also serve as a secondary pedestrian entrance and as the access route to the creche.

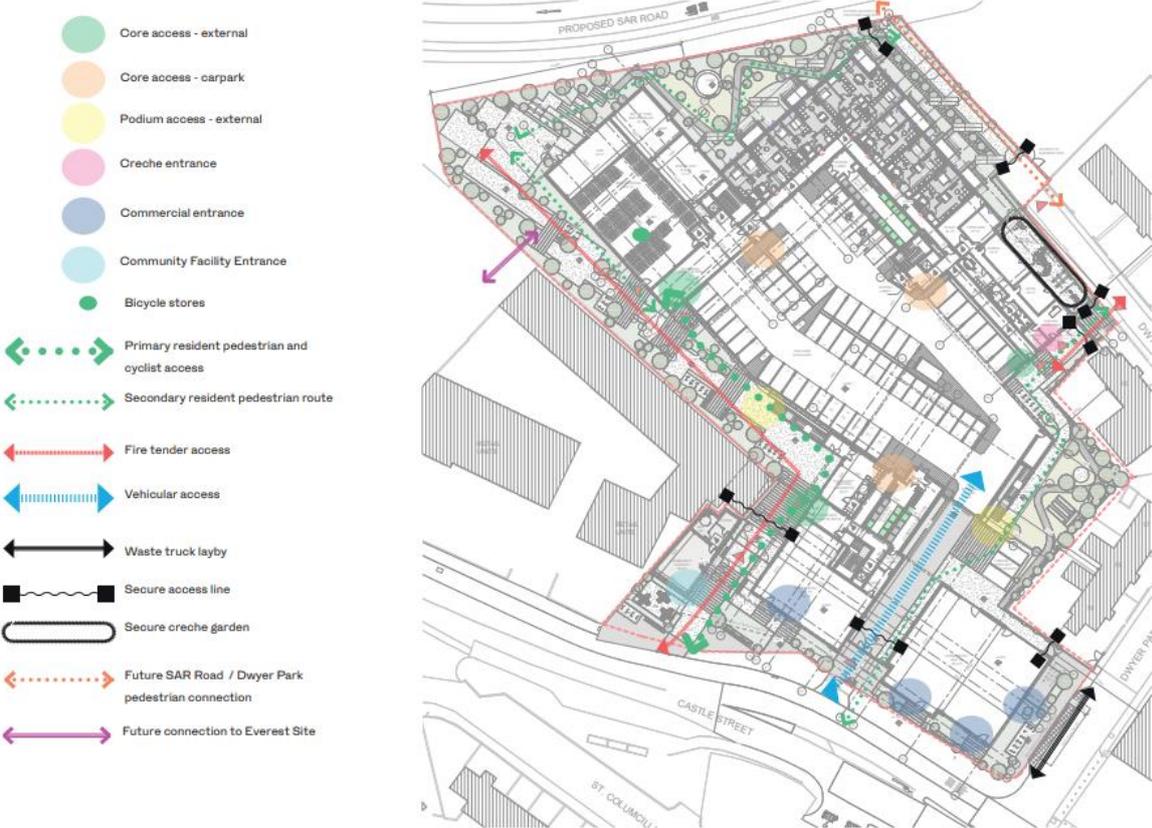


Figure 10: Circulation & Access (HJL)

The primary access point for pedestrians and cyclists will be via a separate entrance on Castle Street, which will also serve as a fire tender access.

Pedestrian access from Dwyer Park will be fob or keypad controlled, facilitating residential access only. As such it will not be available to occasional car drop offs to the creche. This will be monitored and controlled by the Management Company.

The scheme has also been designed to facilitate a future public pedestrian route to the Southern Access Road from Dwyer Park. Until such time as the SAR is delivered, the route will be secured at the end of Dwyer Park.

The technical aspects of the proposed vehicular access, including sightlines and turning movements, are explained in the enclosed *Engineering Services Report* prepared by CHC and associated drawings.

The proposal provides 59 no. car parking spaces, plus 3 creche drop-off spaces. The proposed parking provision is consistent with the requirements of the *Sustainable Urban Housing Design Standards for New Apartments*. Generous cycle parking will be provided, comprising 260 secure spaces and 70 visitor spaces.

4.6 *Infrastructural Services*

The *Engineering Services Report* and associated drawings provide details on water supply, foul drainage and surface water drainage, including SUDS measures.

The report also includes the response of Irish Water to the pre-connection enquiry, which confirms capacity in the network.

For water supply, it is proposed to connect to the existing watermain on the opposite side of Castle Street. Details are shown on CHCE *Watermain Layout* Drawing No. *CHC-00-GR-DR-C-00300*.

For foul drainage, the preferred connection point is the existing 375mm diameter combined sewer in Castle Street to the southeast of the site at the junction of Castle Street and Dwyer Park. Details are shown on CHCE *Drainage Layout* Drawing No. *CHC-00-GR-DR-C-00200* and *Drainage Outfall Layout* Drawing No. *CHC-00-GR-DR-C-00201*.

Further to consultation with Wicklow County Council, the preferred connection location for surface water discharge is to the Dargle River via a new gravity surface water discharge pipe which will be constructed as part of the works as there are no surface water sewers in the area.

5. Flood Risk Assessment

A *Site-Specific Flood Risk Assessment* of the proposal has been undertaken by CHC in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*, Nov 2009, the *Wicklow County Development Plan 2016-2022* and the *Bray Municipal District LAP, 2018-2024*. The development site is located wholly within Flood Zone C for all types of flooding and there have been no sources of flooding identified for the site. There is no requirement to progress to a Stage 2 Initial Flood Risk Assessment.

Based on the Guidelines, the proposed development is deemed ‘Appropriate’ and no justification test is required.

In order to protect the building against potential flooding as a result of network failure within the site, the FFLs have been set a minimum of 500mm above the level of the attenuation facility for the critical storm event.

It is considered, based on surface water management and disposal arrangements proposed, that the proposal will not adversely impact the existing flood regime of the area.

6. Transportation Assessment

Potential impacts on the road network are considered in the enclosed *Transportation Assessment Report* prepared by NRB. The assessment includes a *Travel Plan* and a *Bus/DART Capacity & Demand Report*, which notes that the site is very well served by public transport and by pedestrian and cyclist linkages. The site is therefore, ideally placed to take advantage of non-car modes of travel.

The report demonstrates that the proposed development will have a negligible impact upon the established local traffic conditions and can easily be accommodated on the road network without any capacity concerns arising.

The assessment also confirms that the proposed access junction is of more than adequate capacity to accommodate the worst-case traffic associated with the proposed development.

7. Daylight & Sunlight Assessment

The enclosed *Daylight & Sunlight Analysis* provides a comprehensive assessment of the daylight and sunlight availability for the proposed development in accordance with current (April 2022) best practice.

Analysis of the proposed scheme under the ADF methodology determined that 99% of all Kitchen/Living/Dining (KLD) rooms and Bedrooms exceeded the BRE minimum guidelines, with only 3 rooms marginally below these target values.

One KLD and two bedrooms do not achieve the minimum guidelines values. However, these spaces have been oversized to provide tangible compensatory measures for the spaces.

Due to massing and orientation the proposed amenity space was found to receive excellent sunlight availability with 99% of the central amenity space and 78% of the overall communal amenity space receiving more than two hours of daylight on March 21st significantly more than the BRE minimum of 50%.

Sunlight to balconies has also been assessed under the same BR 209 metric. The analysis determined that the vast majority of the balconies, 99 of 115, will be provided with sunlight in exceedance of 50% for 2 hours. Some balconies to the north end of the scheme do not achieve 2 hours of sunlight for at least 50% of the space on the 21st March (equinox). However, the orientation of these balconies is such that they face north-west

and north-east towards the mature tree filled aspect looking towards Dublin City and the coast and therefore, have good, interesting aspect.

The impact of the proposal on neighbouring buildings is also assessed. The results reveal that adjoining dwellings in Dwyer Park will continue to receive good levels of daylight and sunlight to windows and outdoor amenity spaces.

8. Microclimate Assessment

A *Microclimate Wind Analysis and Pedestrian Comfort Report* prepared by IN2 is submitted with the application. The assessment concludes that ground level spaces and courtyard amenity spaces within the proposed development are predominantly suited to “Pedestrian Sitting/Standing”, in accordance with the Lawson Criteria methodology utilised.

All balcony amenity spaces are deemed to be “Suitable for Outdoor Dining” or “Suitable for Sitting” and are therefore well suited to their intended use as private amenity spaces. Based on the analysis undertaken, it has been determined that no wind mitigation measures will be required within the proposed development as assessed.

The massing of the proposed development offers sheltering from prevailing winds to its neighbouring dwellings to the north, with conditions determined to be suitable for “Outdoor Dining” downwind of the proposed buildings.

9. Archaeological Assessment

An *Archaeological Impact Assessment* of the site and the proposal has been carried out by Shanarc. The report includes an assessment of test trenches that were excavated in February 2022. The test excavations did not uncover any *in situ* remains associated with recorded monuments in the vicinity of the site.

It is noted that mitigation measures are necessary in order to comply with national policy guidelines and statutory provisions for the protection of archaeological, architectural and

cultural heritage, including the National Monuments Acts 1930-2014, the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 and the Planning and Development Act 2000 (as amended).

Recommendations for appropriate mitigation measures at pre-construction and construction stages are included in the report.

10. Architectural Heritage Assessment

An *Outline Architectural Heritage Impact Assessment* prepared by W.H. Hastings, Grade 1 Conservation Architect (Arc Consultants) is submitted with the application.

The assessment notes that there is no potential for the proposed development to result in any direct physical impact on any protected structure, or to have an effect on the setting of any protected structure. The report contains the following assessment: -

Almost all the structures on the site are modern and in poor condition. There is a small ruinous roofless structure near the south-east corner of the site that appears somewhat older. Most of the boundaries of the site are modern, but there are two lengths of boundary wall that appear to be older.

One of these forms the current rear boundary wall of Nos 15 and 16 Dwyer Park and would appear to consist of fragments of the walls of small buildings that were demolished in the course of the construction of Dwyer Park. This wall has little heritage value, is in poor condition, and is unstable. It is proposed to replace it with a safer modern wall.

The second wall is a brick wall near the north-west corner of the site. This appears to be the partial remains of a wall that once bounded a walled garden. It is proposed to retain, repair and refurbish this wall. The retention of this brick wall will give rise to a positive effect on architectural heritage.

11. Landscape & Visual Impact Assessment

A *Landscape & Visual Impact Assessment* prepared by Arc is enclosed with the application. The assessment notes that the position of the site on lower ground greatly reduces the potential visibility of the development. The report states: -

The proposed development will be visible from Castle Street and Dwyer Park and to a lesser extent from St Cronan's Road and St Patrick's Square. There will be one or two partial views of the proposed development from the Upper Dargle Road but otherwise from most of Little Bray, including the area between the Upper Dargle Road and the River, the proposed development will not be visible. From developments along the south side of the River Dargle visibility of the proposed development will also be very limited. From lands on the north side of the River to the east of the subject site, there are likely to be one or two open views of the proposed development.

The report includes a visual impact assessment of the 11 Verified Views of the proposal, prepared by Renderare.

12. Environmental Assessments

12.1 Ecological Impact Assessment

A comprehensive *Ecological Impact Assessment* of the site and proposed development was carried out by Enviroguide. The assessment concludes that subject to implementation of mitigation measures, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the proposed development.

The proposed landscape planting will result in a net biodiversity gain at the site, through the replacement of what is largely hard-standing, built-land and non-native scrub, with a more heterogeneous landscape, comprising extensive native tree planting, grassland areas and pollinator friendly ornamental planting throughout.

12.2 Bat Assessment

A *Bat Assessment* of the proposed development was carried out by Dr Tina Aughney. The report includes mitigation measures for both the construction and operational stages.

12.3 Appropriate Assessment Screening

The *Appropriate Assessment Screening Report* prepared by Enviroguide concludes that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.

12.4 EIA Screening

The *EIA Screening Report* prepared by Enviroguide concludes that the proposed development will not have significant effects on the environment during construction or operation phases.

13. Waste Management

13.1 Construction & Demolition Waste

The management of Construction and Demolition waste is considered in the enclosed *Outline Construction & Demolition Waste Management Plan* prepared by CHC. The report outlines a strategy which can be adopted in carrying out the demolition and construction works in the form of an outline plan which covers the principals covered in DoEHLG guidance publication '*Best Practice Guidelines on the preparation of Waste Management Plans for Construction and Demolition projects*' (2006) in accordance with Section 9 of *Wicklow County Development Plan 2016-2022*.

13.2 Operational Waste

An *Operational Waste Management Plan* (OWMP), prepared by AWN Consulting, is also submitted with the application. The OWMP presents a waste strategy that complies with all legal requirements and waste policies. Implementation of the OWMP will ensure a high level of recycling, reuse and recovery at the development.

14. Construction Management

An *Outline Construction Management Plan* has been prepared by CHC. The Plan sets out the framework of measures to be developed by the Main Contractor as part of their obligation to properly manage the site and control all related activities that occur outside

the site so that any related impact on people, property and the environment is reduced, insofar as possible, to an acceptable level.

An *Outline Construction Environment Management Plan (CEMP)* prepared by Enviroguide is also enclosed. The CEMP describes the proposed works and defines the measures that shall be implemented during construction to manage, minimise or mitigate potential environmental impacts that may arise.

15. Energy Statement

An *Energy Statement* prepared by MCE is enclosed with the application. The design includes renewables in accordance with Part L. The detailed design of the buildings shall commit to the principles of sustainable design and energy efficiency by incorporating the maximum use of materials with low embodied energy characteristics.

16. Part V

The enclosed *Part V Booklet* includes layout plans indicating proposed Part V units as well as estimated costings. The applicant has engaged with Wicklow County Council on Part V and an email from the Housing Section is included in the booklet.

17. Statement of Consistency – Development Plan

The relevant Development Plan to be considered is the *Wicklow County Development Plan (WCDDP) 2016-2022*.

17.1 Vision and Core Strategy

17.1.1 Vision

The vision for Wicklow is *to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.*

Response: The proposal will provide high quality homes in an established urban setting, enhance the choice of housing in Bray, contribute to social and community infrastructure and provide employment opportunities in the new commercial units.

17.1.2 Core Strategy

The purpose of the Core Strategy is to articulate a medium to longer term quantitatively based strategy for the spatial development of the area that is consistent with national and regional planning objectives.

Within the settlement hierarchy, Bray is identified as a Metropolitan Area Consolidated Town.

Core Strategy Map

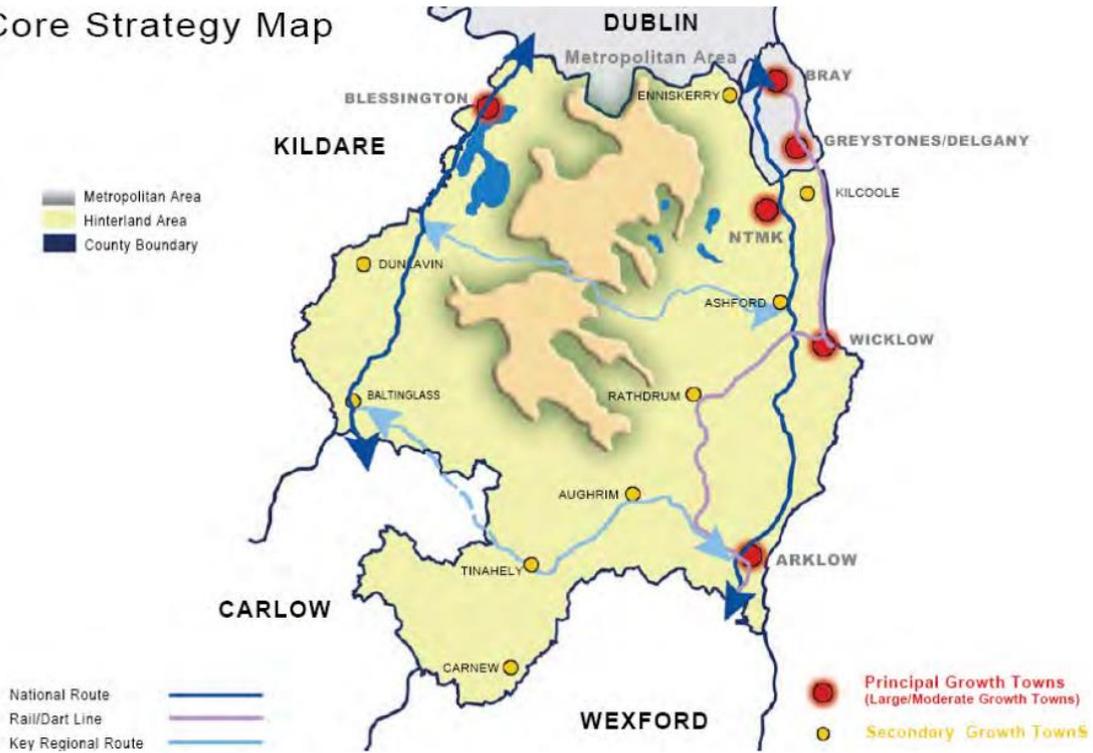


Figure 12: WCDP 2016-2022 Core Strategy Map

The population and housing targets for Bray are provided in Tables 2.4 and 2.7 of the WCDP, copied below.

Designation	Town	2011	2022	2025	2028
Consolidation Town	Bray	29,339	36,237	38,119	40,000

Table 2.4 of the WCDP – Population Target for Bray

	2011 Existing Housing Stock	2022 Target Housing Stock	2028 Target Housing Stock	Target Housing Stock Growth 2011-2028	% of total Housing Stock Growth 2011-2028
Bray	11,518	13,958	16,896	5,378	17.22%

Table 2.7 of the WCDP – Housing Targets for Wicklow

Response: The proposed development provides 139 no. residential units, which will contribute to achieving the above population and housing stock targets for Bray.

17.2 Settlement Strategy

Bray is the largest town in County Wicklow located in a strategically important position within the metropolitan area and at the eastern gateway to the County. The town has the best transport links in the County, with access to the N/M11 transportation corridor (including M50), DART/ rail line and quality bus service. It is a strong active town that provides a higher order economic and social function for its local residents and for residents from other surrounding towns and villages. It is acknowledged in the WCDP that Bray *should continue to consolidate and to densify at suitable locations in a sustainable manner.*

Response: The proposal will consolidate Bray town centre through the redevelopment of an underutilised site. The site is within walking distance of high quality public transport and social infrastructure. The enclosed *Social Infrastructure Audit* provides details on the amenities within walking distance of the site.

17.2.1 Settlement Strategy Objectives

SS1 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 the designated metropolitan growth centres and the large, moderate and small growth towns in the Greater Dublin hinterland area.

Response: The proposal is consistent with the objective to grow the metropolitan growth centre of Bray by redeveloping a serviced site.

SS3 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.

Response: The site is located in an established urban environment supported by physical and social infrastructure. The proposal supports compact urban form and is well served by public transport, which will be further improved in the coming years with the roll out of Bus Connects. The site is located within 1km of the Bray DART station.

SS4 To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.

Response: The site is designated for Town Centre development, which supports a mix of uses including residential.

SS5 To implement the population and housing growth targets as set out in the Core Strategy and Settlement Strategy, to monitor development and the delivery of services on an ongoing basis and to review population allocations where service delivery is impeded.

Response: The proposal will contribute to achieving the population and housing stock targets for Bray.

17.3 Housing

17.3.1 Sustainable Communities

Well-designed homes in the right locations are fundamental to building strong, sustainable communities. The WCDP requires the following criteria to be considered:

- Deliver a quality-of-life which residents are entitled to expect, in terms of amenity, safety and convenience;

Response: The dwellings have been designed in accordance with the relevant guidelines and meet or exceed all standards. Please refer to development management standards below for further details.

- Prioritise walking, cycling and public transport, and minimise the need to use cars;

Response: Walking, cycling and the use of public transport will be prioritised in the subject scheme as set out in the enclosed *Travel Plan*. Car parking is provided at a rate of 0.42 spaces per unit, which will assist in encouraging residents to use alternative modes of transport.

- Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;

Response: The subject proposal is located in an established urban area and has good access to surrounding community and support facilities. Further details are

provided in the enclosed *Social Infrastructure Audit*. The mixed-use nature of proposal will also enhance facilities in the area, with commercial units, creche and community rooms.

- Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;

Response: The buildings will be constructed from high quality and durable materials. The landscaping proposal enhances the public realm along Castle Street, while the central communal space will create a sense of place for residents.

- Are easy to access for all and to find one's way around;

Response: Access and circulation have been carefully considered in the design. Primary and secondary pedestrian routes are presented and illustrated in the *Architectural Design Statement*.

- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;

Response: Sustainability has been considered throughout the scheme development as described in the enclosed *Energy Statement*.

- Provide a mix of land uses to minimise transport demand;

Response: The proposal provides a mix of residential, commercial, creche and community uses.

- Promote social integration and provide accommodation for a diverse range of household types and age groups;

Response: The proposal provides a range of apartment types and sizes, which are universally accessible and suitable for all age groups.

- Enhance and protect the green infrastructure and biodiversity;

Response: Potential impacts on biodiversity are considered in the enclosed *Ecological Impact Assessment*.

- Enhance and protect the built and natural heritage.

Response: The archaeological and built heritage are considered in the enclosed *Archaeological Impact Assessment*.

17.3.2 Zoning

New housing development shall be required to locate on suitably zoned / designated land in settlements. The priority for new residential development shall be in the designated

‘town’ and ‘village’ / ‘neighbourhood centres’ or ‘primary zone’ in settlements with development plans, or in the historic centre of large and small villages, through densification of the existing built-up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, particular cognisance must be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents and maintaining existing parks and other open areas within settlements.

Response: The proposal seeks to redevelop and densify a town centre zoned site, in accordance with the principles set out above.

17.3.3 Density

It is an objective of the Council to encourage higher residential densities at suitable locations, particularly close to existing or proposed major public transport corridors and nodes, and in proximity to major centres of activity such as town and neighbourhood centres.

Response: The proposal has a density of 162 units per hectare, which is considered appropriate for a town centre site served by DART and which will be served by a Bus Connects corridor in the future.

***HD1** New housing development shall be required to locate on suitably zoned or designated land in settlements, and will only be considered in the open countryside when it is for the provision of a rural dwelling to those with a housing, social or economic need to live in the open countryside.*

Response: The site is appropriately zoned to accommodate a mix of uses including residential development.

***HD2** 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.*

Response: The proposal will replace a declared Vacant Site with a high-quality mixed-use development. The amenities of adjoining residents have been carefully considered in terms of transitioning scale, separation distances, overlooking and sunlight/daylight.

***HD3** 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.*

Response: The residential units have been designed in accordance with guidance contained in the *Wicklow County Development Plan* and the *Sustainable Urban Housing Design Standards for New Apartment Guidelines 2020*.

***HD4** 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.*

Response: 10% of units will be offered for social housing, as shown on the *Part V booklet* enclosed with the PAC.

***HD5** 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.*

Response: The Development Plan does not specify a density for the subject site. However, the proposal accords with the principle of making efficient use of town centre land. The density was considered to be acceptable and in accordance with local planning policy by Wicklow County Council during Pre-Application Consultation.

17.3.4 Sequence/Phasing of Housing

***HD8** 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. 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.

Response: Please refer to the enclosed *Social Infrastructure Audit* for details of social and community infrastructure located in proximity to the site. The proposal seeks to enhance social and community infrastructure by providing a creche and community facility.

17.3.5 Unit Types/Sizes/Locations

HD13 *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.*

Response: The site is appropriately located to accommodate apartments.

HD14 *New apartment developments dependent on access through existing established areas of predominantly single family homes will generally not be permitted.*

The principal vehicular and pedestrian access to the new apartments will be from Castle Street, with secondary pedestrian access from Dwyer Park in the interests of permeability.

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).*

Response: The subject proposal is an apartment only development and therefore the above objective does not apply.

17.3.6 Housing Formats

HD17 The maximum size of any single 'housing estate' shall be 200 units and developments that include more than 200 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes.

Response: This objective is not applicable to the subject proposal.

HD18 The development of 'serviced sites', where site purchasers have the option of designing their own home, shall be particularly encouraged on zoned / designated housing land.

Response: This objective is not applicable to the subject proposal.

17.3.7 Urban Regeneration & Housing

HD19 In many settlements in the County, there are sites and areas in need of development and renewal, in order to prevent:

- a. adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,*
- b. urban blight and decay,*
- c. anti-social behaviour, or*
- d. a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses*

It is an objective of this plan to encourage and facilitate the appropriate development of such sites / lands and all available tools and mechanisms, including the Vacant Site levy, may be utilised to stimulate such development.

Response: The main part of the site is registered as a Vacant Site (Ref. VS/B/04). The proposal will facilitate the regeneration of the site for the wider benefit of the area.



Figure 13: Extract from Wicklow County Council Vacant Site Register February 2022

17.4 Community Development

Where a new significant residential or mixed used development is proposed, the Planning Authority may require certain social and community facilities to be provided as part of the proposed development and/or may require a special financial contribution to be made to contribute to the development of such facilities.

It is noted that the Planning Authority may require a ‘social infrastructure audit’ to be carried out by a developer, to determine if facilities in the area are sufficient to provide for the needs of the future residents and 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.

Response: A *Social Infrastructure Audit* has been prepared and is enclosed. The area is well served by community and social infrastructure. A crèche and community facility will be provided as part of the scheme.

17.4.1 Leisure and Recreation Objectives

CD26 *To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.*

CD27 *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.*

Response: There is dedicated play features integrated into the perimeter garden walkway, including a kick about area, with rebound wall and climbing wall, basketball net, teenage and toddler play equipment. There is also natural play occurring throughout the proposed landscape.

CD28 *All new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children as a priority.*

Response: The perimeter walks and open spaces within the scheme will be free from vehicular traffic to provide a safe environment.

CD29 *Subject to safety considerations, natural features (trees, streams etc) shall be retained in new developments.*

Response: Due to the brownfield nature of the site, there are no natural features of significance to be retained.

CD30 *In accordance with Objective CD5, where a deficiency in facilities for teenagers/young adults and/or indoor community space is identified in an area, the*

developer of any significant new residential estate may be required to address the deficiency.

Response: The proposal provides two community facilities, one for the wider community and one for residents of the scheme.

17.4.2 Open Space Objectives

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)*

Response: The scheme includes a large central amenity space and two smaller amenity gardens to the north and south, as well as perimeter amenity walks and play area.

CD46 *All open spaces shall be provided with environmentally friendly lighting in order to ensure their safe usage after day light hours.*

Response: Environmentally friendly external lighting plans prepared by MCE are enclosed.

17.5 Infrastructure

17.5.1 Walking and Cycling Objectives

TR11 *To facilitate the development of 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.*

Response: The scheme provides a network of footpaths through the amenity spaces and enhances the overall permeability of the area.

17.5.2 Roads Objectives

TR15 Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Roads and Bridges' the 'Traffic & Transport Assessment Guidelines' (TII) and the Design Manual for Urban Roads and Streets (DoECLG & DoTTS).

Response: A *Transportation Assessment Report* prepared by NRB is enclosed.

TR16 Road Safety Audits and/or Road Safety Impact Assessments shall be required at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road layout is proposed.

Response: A Road Safety Audit is included in the *Transportation Assessment Report*.

TR23 To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.

Response: The enclosed *Transportation Assessment Report* concludes that there are no operational traffic safety or road capacity issues associated with the proposed development. The design team has engaged with Jacobs Consulting Engineers (acting for NTA) to ensure that the proposal can accommodate all future roads works associated with Bus Connects.

17.5.3 Parking Objectives

TR35 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 7.1 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.

Response: A rationale for the proposed car parking provision is contained in the *Transportation Assessment Report*.

TR36 Provision shall be made in all new / expanded developments for disabled parking (and associated facilities such as signage, dished kerbs etc), at a suitable and convenient location for users.

Response: The proposal provides for 3 no. disabled parking spaces.

17.5.4 Water Objectives

WI3 To require new developments to connect to public water supplies where services are adequate or where they will be provided in the near future.

Response: It is proposed to provide a new connection to the public water supply. Please refer to the enclosed *Engineering Services Report* prepared by CHC and Irish Water Letter of Feasibility for further details.

17.5.5 Storm and Surface Water Infrastructure Objectives

WII1 Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.

Response: Separate foul and surface water networks are proposed. Surface water will discharge to the River Dargle via a proposed drain. Foul water will discharge to an existing combined sewer on Castle Street.

WII2 Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of

on-site or is attenuated and treated prior to discharge to an approved surface water system.

Response: The proposal fully complies with the principles of SUDS, as described in the enclosed *Engineering Services Report* and associated drawings.

17.5.6 Flood Management Objectives

FL4 *Applications for new developments or significant alterations/extension to existing developments in a flood risk area shall comply with the following:*

- *Follow the 'sequential approach' as set out in the Flood Risk Guidelines.*
- *Flood risk assessments will be required with all planning applications proposed in areas identified as having a flood risk, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site).*
- *Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.*
- *Generally a Flood Impact Assessment will be required with all significant developments and a certificate (from a competent person stating that the development will not contribute to flooding within the relevant catchment) will be required with all small developments of areas of 1 hectare or less.*

Response: A *Site Specific Flood Risk Assessment* prepared by CHCE is enclosed.

FL6 *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*

Response: The proposal will replace an almost entirely impermeable site with permeable surfaces, green roofs etc.

FL7 *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*

Response: The SUDS strategy is explained in the *Engineering Services Report* and associated drawings.

FL8 To require all new developments to include proposals to deal with rain and surface water collected on site and where deemed necessary, to integrate attenuation and SUDS measures.

Response: The SUDS strategy is explained in the *Engineering Services Report* and associated drawings.

17.5.7 Waste Management Objectives

WE1 To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan for the safe and efficient disposal of waste from the site.

Response: An *Outline Construction & Demolition Waste Management Plan* prepared by CHC is enclosed.

WE2 To require all new developments, whether residential, community, agricultural or commercial to make provision for storage and recycling facilities (in accordance with the standards set out in Development & Design Standards of this plan).

Response: Appropriate waste storage and recycling facilities for the residential and commercial components are proposed in accordance with the *Operation Waste Management Plan* prepared by AWN.

17.5.8 Noise Pollution Objectives

WE14 To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions.

Response: Measures to control noise and vibration are contained in the *Construction Environmental Management Plan* prepared by Enviroguide.

17.5.9 Heating Objectives

CCE25 To require all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 273 of 2012 European Communities (Energy Performance of Buildings) Regulations 2012 and the Building Control (Amendment) Regulations 2014.

Response: The sustainable energy strategy is explained in the enclosed *Energy Statement* prepared by MCE.

17.6 Heritage

17.6.1 Archaeology Objectives

BH1 No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.

BH2 Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedule 10.01 & 10.02 and Map 10.01 & 10.02 of this plan) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a competent archaeologist.

Response: An *Archaeological Impact Assessment* prepared by Shanarc is enclosed.

17.6.2 Biodiversity Objectives

NH1 To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.

Response: Potential impacts on biodiversity are considered in the enclosed *Ecological Impact Assessment* prepared by Enviroguide.

NH2 No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this plan (either individually or in combination with other plans or projects).

Response: Potential impacts on Natura 2000 sites are considered in the enclosed *Appropriate Assessment Screening Statement* prepared by Enviroguide.

17.6.3 Green Infrastructure Objectives

NH32 To protect existing green infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be achieved with regard to the following:

- *Provision of open space amenities,*
- *sustainable management of water,*
- *protection and management of biodiversity,*
- *protection of cultural heritage, and*
- *protection of protected landscape sensitivities.*

NH34 New development and redevelopment proposals, where considered appropriate, are required to contribute towards the protection, management and enhancement of the existing green infrastructure of the local area in terms of the design, layout and landscaping of development proposals.

Response: Currently the site is primarily occupied by buildings and hard surfaces and the proposed landscape will significantly improve the green infrastructure on the site. The NMP *Landscape Design Statement* includes analysis of how the proposal ties into the existing green infrastructure network in Bray.

17.7 Development and Design Standards

17.7.1 Mixed Use and Housing in Urban Areas

Any proposed development must consider both its site and its surroundings and respond to them in a positive way. New development shall generally follow the pattern of development in that area, with regard to building form, massing, height and design features, unless the relevant local plan specifies otherwise. In particular:

- *New developments will require to be ‘integrated’ with the existing built fabric, in the sense that it will knit together, both physically and visually with the surrounding buildings;*

Response: The design responds to the existing built environment, in particular the 2-storey scale of dwellings at Dwyer Park. The massing of the buildings is significantly reduced where they are closest to dwellings in Dwyer Park. A contrasting response is adopted on Castle Street, which is a commercial street with significant scale at the Upper Dargle Road junction.

- *New developments will be required to form new street frontage or to bridge existing gaps in the streetscape. Where an access point is required, this should be in the form of a tunnel or arch. Where appropriate or necessary, buildings may however be stepped backwards or forwards, to add visual interest and variety to the town, subject always to this not undermining or interfering with an established streetscape;*

Response: The proposal will repair a significant gap in the existing streetscape. The width of access points is minimised, with the vehicular entrance being in the form of an undercroft access to maintain the integrity of the streetscape.

- *The development of new streets and squares will be encouraged, as well as the opening up of new links between sites or from backlands to the street front;*

Response: The proposal will enhance the public realm and create new connections between Castle Street and Dwyer Park.

- *Where the plot width of the site is considerably wider than the prevailing plot width along the street, the new building's will be required to be broken into visually distinguishable elements, to allow for a more seamless transition between existing and new;*

Response: The streetscape to the immediate north and south comprises wide plots serving commercial premises. Notwithstanding this, the massing of the Block B frontage to Castle Street is broken down by graduating the height (from 4 to 6 storeys), staggering the building line and using a variety of materials.

- *While intensification of development in town centres is encouraged, excessive height shall not be utilised as the principal mechanism for achieving this. Heights more than 1-storey above adjoining buildings will not normally be accepted, unless the individual town plan has set a height standard. Any application for heights in excess of this shall submit detailed justification and visual assessment of the proposal, including rendered drawings / photomontages and day and sunlight analysis.*

Response: The sensitivities of the adjoining residential properties have been carefully considered by the design team. The massing of the proposed blocks steps down significantly towards Dwyer Park. The relationship to the existing built environment is illustrated in the Verified Views contained in the *Architectural Design Statement*. The enclosed *Daylight & Sunlight Analysis* confirms that the proposal will have minimal impact on existing residential properties.

17.7.2 Large scale town centre retail, commercial and mixed use schemes

In the context of larger scale retail/ commercial/ mixed use developments, while adequate car parking, separate service areas and convenient access by public transport and by walking / cycling from surrounding residential areas are essential elements, these must be supplemented by features that improve the overall attractiveness of the scheme to the public. Such features can include for example:

- *Public realm of appropriate scale, design and enclosure;*

Response: The scheme provides for an enhanced public realm along the Castle Street frontage.

- *The provision and design of street furniture, e.g. telephones, seats, litterbins, cycle facilities;*

Response: The proposed landscape masterplan provides seating opportunities and visitor cycle parking.

- *The provision within the overall design of the scheme for public facilities, e.g. toilets, advice centres, health clinics, crèches, child and special care facilities; activities and uses that keep the centre alive both during the day and evening;*

Response: The scheme provides an active street front with commercial and community uses at ground floor.

- *Active facades – blank facades not visible to public areas;*

There are no blank facades facing the public realm.

- *The inclusion of residential uses, particularly apartments, as an integral part of the centre in order to generate evening activity and security of the centre;*

Response: Significant residential accommodation is proposed.

- *An overall design strategy that helps promote variety (by the use of differing shopfronts, plot widths, setbacks, signs etc.) but set within an overarching and cohesive design concept that unites the whole;*

Response: The design strategy is explained in the enclosed *Architectural Design Statement*.

- *The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. All unsightly areas for example, service cores, delivery areas, should be screened from surrounding residential areas and from pedestrian corridors within the scheme. Attention shall be given to the treatment of car parking so as to avoid unsightly views. Special consideration shall be given*

to the detailing of extensive frontages and flank walls. Considered screening should form an integral part of any design, but where this is not possible, supplementary tree planting and landscaping will be necessary;

Response: These matters are considered in the *Architectural Design Statement* and *Landscape Design Statement*.

- *Industrial materials/ appearance e.g. metal / industrial panel finishes, lacking in fenestration, industrial fencing etc will not normally be accepted;*

Response: These matters are considered in the *Architectural Design Statement* and *Landscape Design Statement*.

- *Considered tree planting and landscaping must, in any event, form an integral part of the general design of any large scale scheme;*

Response: These matters are considered in the *Landscape Design Statement*.

- *Appropriate signage;*

Response: The HJL elevation drawings indicate the general position of signage along the Castle Street frontage.

- *Protection of residential and visual amenities*

Response: The amenities of the adjoining properties have been carefully considered the design process.

17.7.3 Intensity of Development

The following are the maximum plot ratios applicable to proposed developments.

Location	Maximum plot ratio
Commercial, housing or mixed use core town centre area (zoned TC)	2 (20,000sqm of development per hectare)
Commercial, housing or mixed use edge of centre (zoned TC)	1 (10,000sqm of development per hectare)
Housing only edge of centre	0.5 (5,000sqm of development per hectare)
Housing only greenfield	0.35 (3,500sqm of development per hectare)

Response: The plot ratio of the subject development is 1.9, which is consistent with the maximum town centre plot ration of 2.

- *All planning applications shall provide a table of data showing site area, development area, building footprint, total building floor area and a calculation of plot ratio;*

Response: Please refer to Table 1 of this document.

- *'Density' will only be allowed to be generated from land that is capable of being built upon; land which is ultimately unsuitable for such purposes (e.g. due to excessive slope) will not be considered to be part of the density equation even if it forms part of the overall site. Any such areas should be clearly shown on planning applications drawings;*

Response: The proposed density of 162 units per hectare is generated from the Core Site Area of 0.86 hectares, which excludes the part of the site boundary comprising public footpaths and roads and stormwater access to the River Dargle.

- *The density that can be achieved on any site will ultimately depend on compliance with 'qualitative' standards such as fit with surroundings, height, open space provision, adequate privacy, car parking etc and the density ultimately proposed should be the outcome of the design process rather than the starting point;*

Response: This principle was applied throughout the design process, with density reducing to respond to site context.

- *In certain circumstances, such as brownfield sites in urban areas or sites in very close proximity to a high quality, reliable public transport network, departures from the maximum density standards specified may be considered, subject to the highest quality of design;*

Response: The proposal is consistent with density standards.

17.7.4 Suitability of Use

The proposal is consistent with the key components required for Town Centre sites by providing active uses at street level with residential at upper floors.

17.7.5 Accessibility

New developments will be required to place a high emphasis on permeability and legibility of access routes.

Response: The circulation strategy is illustrated in the *Architectural Design Statement*. The primary pedestrian access route leads to the main entrance to Block A, while secondary routes lead to Block B and the creche. The central podium open space facilitates a high level of permeability across the site and between Castle Street and Dwyer Park.

Relaxation in car parking standards in town centres may be considered where:

- Good public transport is available;
- The applicant can provide a robust model of car parking usage to show that dual usage will occur and that peak car parking demand at any time of the day / week will always be met;
- There is a parking enforcement system in place in the town concerned or town car park in proximity to the site. In such cases, only the needs of long-term users (e.g. employees, residents) will have to be addressed by the developer.

Response: A reduced rate of car parking is proposed in accordance with the principles of promoting sustainable travel. Details are provided in the *Transportation Assessment Report*.

17.7.6 Design Quality

Layout

- *New urban developments shall be so laid out to have a 'relationship' with the public realm, with windows / balconies overlooking existing or proposed streets /*

open spaces. Buildings backing onto public areas, whether they are streets or public open spaces, will not be permitted;

Response: The proposal engages fully with the public realm on Castle Street and Dwyer Park.

- *Other than along existing street frontage where it may be necessary to maintain an existing building line, a variety in set backs and building lines shall be provided to provide for visual interest and to create interesting spaces.*

Response: The proposal provides a strong built edge to Castle Street, with appropriate setbacks to facilitate future road widening for Bus Connects.

- *Notwithstanding established separation 'rules' that may be applied to maximise privacy for dwellings, traditional back-to-back rows of 2-storey houses, exactly 22m apart should be avoided and more imaginative layouts and building forms provided, subject always to adequate privacy being provided;*

Response: The proposal solely includes apartments and therefore the above is not applicable to the subject scheme.

- *Layouts shall ensure adequate sunlight and daylight, in accordance with "Site layout planning for daylight and sunlight: a guide to best practice", (BRE 1991);*

Response: The scheme was developed in consultation with daylight/sunlight experts. A *Daylight and Sunlight Analysis* prepared by IN2 is enclosed.

- *Roads should be designed in a hierarchical manner, so that the bulk of traffic moves around distributor roads, with the majority of residences located on lightly trafficked routes (this of course should be balanced with the need to maximise permeability within the development). Roads, footpaths and car parking areas shall be located and designed so that obstructive on street parking or parking on kerbs is not necessary;*

Response: Vehicular traffic within the scheme is minimised by directing all traffic to the undercroft car park, ensuring all amenity spaces are free from traffic.

17.7.7 Building Design

External appearance

- *Good modern architecture with a building language that is varied and forward-looking rather than repetitive and retrospective will be required; however, reference and 'clues' must be drawn from surroundings, particularly in traditional or protected town centre areas;*
- *Variation in external materials will be expected, again subject to 'fit' with surrounding buildings. Care shall be taken in excessive use of contrasting materials and generally no more than two contrasting materials shall be utilised on any façade;*
- *The provision of roof mounted communal satellite dishes in town centre commercial and apartment developments will be required to be considered, to avoid demands for numerous individual dishes;*
- *Where a development takes the form of more than one structure (i.e. a number of apartment blocks or a multitude of individual houses), adequate variety in form, height, materials etc shall be employed, within an overall unified theme, to provide for visual diversity.*

Response: The design rationale is explained in illustrated in the *Architectural Design Statement*.

Unit sizes and formats

- *All planning applications shall be accompanied by a data table setting out number and floor area of all commercial and residential units;*
- *New apartment developments will be required to include a range of unit sizes to cater for different housing needs;*
- *The minimum size / dimensions of apartments, including room and storage / amenity space sizes, as well as the internal layout and aspect, and hallways and lift core design, as set out in 'Sustainable Urban Housing: Design Standards for*

New Apartments – Guidelines for Planning Authorities’ (as may be amended or updated during the lifetime of the plan), shall be adhered to;

- *In the design of new residences, cognisance shall be had of the changing space demand of households over time. For example, apartment formats should allow for either the future subdivision of larger units or the merging of two or more smaller units (either horizontally or vertically) and houses (including bungalows) should have attics capable of conversion to habitable rooms.*

Response: The *Architectural Design Statement* includes a detailed Schedule of Accommodation and Housing Quality Assessment demonstrating compliance with all relevant standards. The scheme provides an appropriate mix of 1, 2 and 3-bedroom units, which can be adapted to serve the changing needs of households.

17.7.8 Privacy

- *Residential developments shall be so designed and constructed to ensure maximum privacy for residents;*
- *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. In this regard, the design of ground levels units with little or no separation from footpaths or other public areas shall be carefully considered and mitigation measures applied;*
- *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: the careful positioning and detailed design of opposing windows can prevent invasion of privacy even with short back-to-back distances. Windows serving halls and landings do not require the same degree of privacy as say balconies and living rooms;*
- *The degree of ‘overlooking’ afforded by different windows types shall be considered appropriately; for example, an angled roof light will not have the same impact as a traditional ‘flat’ window on the same elevation;*

Response: All ground floor uses addressing the public realm are non-residential. Ground floor units which open onto communal amenity spaces will have planted buffer areas.

The HJL *Architectural Design Statement* explains how the scheme was designed to respond to the surrounding context, in particular the dwellings on Dwyer Park. A number of measures to mitigate potential overlooking are described and illustrated on pages 37 and 38 of the document – through scheme design, height graduation, screened private balconies/opaque glazing where indicated, screened podium and landscape.

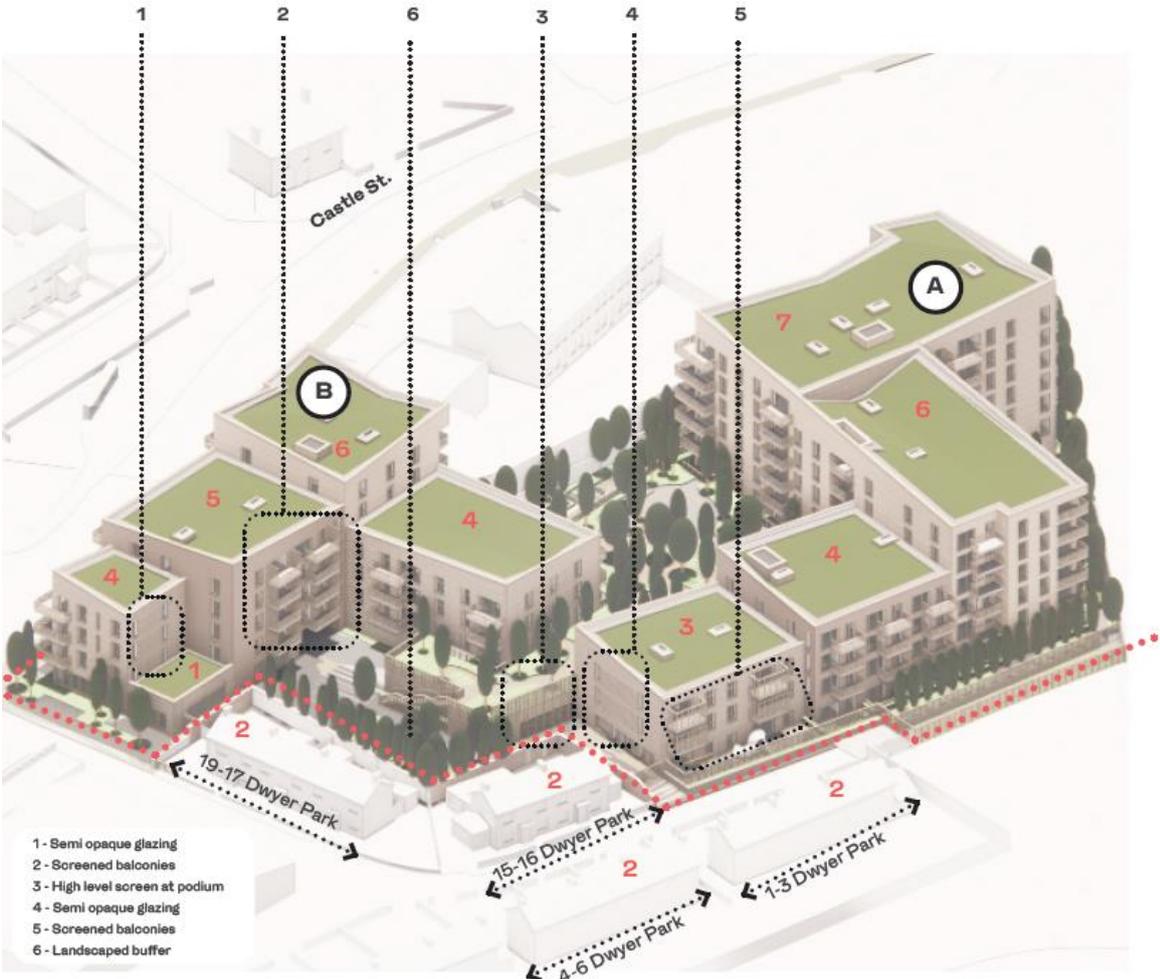


Figure 14: Extract from Architectural Design Statement

Above ground level separation distances between opposing windows in the proposed development and Dwyer Park range from c. 18m to 30m, as indicated on the floor-by-floor site plans enclosed with the application.



Figure 15: Relationship to 1-3 Dwyer Park (extract from Proposed 1st Floor Plan)



Figure 16: Relationship to 17-19 Dwyer Park (extract from Proposed 1st Floor Plan)

To mitigate overlooking of private amenity space, the eastern end of Block B steps down to single storey where it is closest to 19 Dwyer Park and upper-level windows facing the side of No. 19 will have opaque glazing.



Figure 17: Relationship to 19 Dwyer Park (extract from Proposed 1st Floor Plan)

The relationship to No. 15 Dwyer Park has also been carefully considered. There are no directly opposing windows at upper levels and no windows directly overlooking the rear garden. The podium amenity will incorporate screening at this location to prevent overlooking.



Figure 18: Relationship to 15 Dwyer Park (extract from Proposed 1st Floor Plan)

The windows at the eastern (3-storey) end of Block B are narrow slit windows, serving as secondary windows to living rooms.

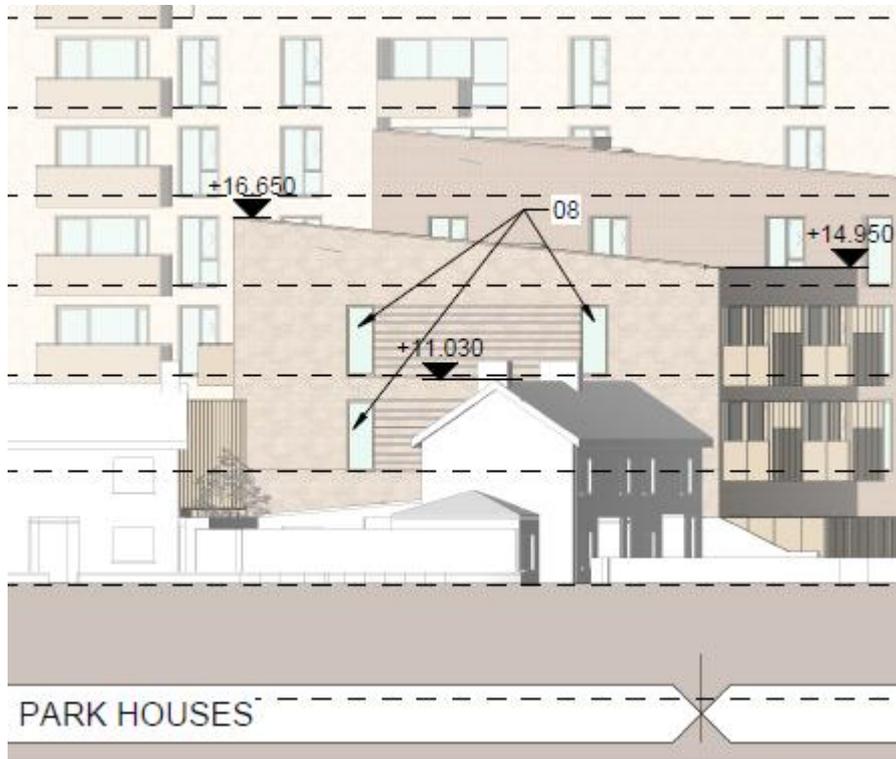


Figure 19: 3-storey elevation facing 15/16 Dwyer Park (extract from Contextual Elevations)

17.7.9 Green Issues

- *To require all new buildings during the design process to incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006;*

Response: Sustainable technologies are considered in the enclosed *Energy Statement*.

- *All new buildings will be required to incorporate water saving measures. This may include rain water harvesting for internal service uses. In particular, all new dwellings with individual surface water collection systems will be required to be provided with water butts;*

Response: The proposal is designed to in compliance with SUDS principles, as explained in the *Engineering Services Report*.

- *All buildings will be required to be provided with a suitable area on site for the keeping of waste storage receptacles for mixed dry recyclables, organic waste (composters) and residual waste. In apartment developments, this may be in the form of grouped individual bins in car parking areas or a designated waste building; for individual houses with no side or rear lane from the garden to the public road (e.g. mid terrace houses), this may entail a designated, appropriately designed / screened / enclosed area to the front of the house;*

Response: The proposal includes separate bin stores for the residential and commercial elements. An *Operational Waste Management Plan* is enclosed.

- *Consideration should be given in the design of new buildings to the provision of green roofs or walls (i.e. roof gardens / planted balconies etc), to aid in both water absorption but also to contribute positively to the environment and visual amenity.*

Response: A significant portion of the roof will be green as indicated on the Proposed Roof Plan.

17.7.10 Open space

- *Open space shall be provided in all new developments, the scale of which shall be dependent of the use of the building/site. While the provision of such space may not always be possible in built up urban locations, new developments shall endeavour to provide a minimum area equivalent to 5% of the building gross floor area;*

Response: The proposal provides c. 1,600m² of communal open, which equates to 10% of the building gross floor area (16,035m²).

- *Within apartment developments, private and communal amenity space shall be provided in accordance with Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for planning authorities' (DoECLG, 2015). Care should be taken to ensure that such places receive adequate sunlight and meet the highest safety standards. The front wall of balconies should be made from opaque material and be at least 1m in height.*

Response: Private and Communal Open Space is provided in accordance with *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (December 2020)*. Details are provided in the *Architectural Design Statement*.

The communal spaces comply with relevant standards for sunlight as explained in the enclosed *Daylight & Sunlight Analysis*.

Balcony screens shall be of textured metal to allow for privacy and add character. Images of the proposed materials are included in the *Architectural Design Statement*.

Public Open Space

- *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;*
- *Spaces less than 10m in width or 200sqm in area will not be counted as useable public open space; nor will space that is excessively sloping or otherwise unsuitable for usage*
- *The need to provide public open space in town centre developments may be waived if the development specifically achieves other overriding aims of this Plan, particularly where public amenity space such as a town park or beach is in close proximity*

Response: The proposal provides c.1,600m² of Communal Open Space at ground and podium levels, which equates to c. 19% of the core site area (8,594m²). The spaces are of sufficient size to be functional amenity spaces. The character and function of each space is explained in the NMP *Landscape Design Statement*.

The site is located within walking distance of public parks (including People's Park) and Bray Promenade.

The proposed development achieves the overriding objective of providing a high-density mixed-use scheme on a prominent, vacant redevelopment site. Furthermore, the proposal will greatly enhance the public realm along Castle Street with hard and soft landscaping, with a community building facing a plaza accessed by foot and cycle from Castle Street.

Active Open Spaces (AOS)

In accordance with the Planning Authority's Active Open Space Policy, active open space shall be required as a rate of 2.4ha per 1,000 population divided into

- *1.6ha outdoor play space (pitches, courts, sports grounds)*
- *0.6ha casual play spaces (parks)*
- *0.2ha equipped play space (playgrounds and MUGAs)*

Normally, public AOS in accordance with this standard will be zoned through the local plan process and individual development will be required to either deliver some or all of the space required (through an action area agreement) or via development levies. However, where such provision has not been made in a local plan, any application or Action Area Plan would result in a resident population of 1,000 or more, compliance with this standard will be required.

Response: The subject proposal, at an average maximum level of 2.7 persons per unit, will not result in a population increase of 1,000 or more. It is therefore considered that the above objective is not applicable to the subject site.

17.7.11 Car Parking

- 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.
- Communal car parking areas shall be conveniently located for residents and suitably lit at night-time;
- Adequate provision shall be made for visitor and disabled car parking;
- Designated sheltered and secure bicycle parking will be required in apartment developments.
- Shared residential 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 space numbers.

Response: The proposal provides a reduced rate of car parking in accordance with *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (December 2020)*.

Secure and sheltered bicycle parking will be provided at ground floor level.

The strategy for electric vehicle charging is outlined in Paragraph 2.17 of the enclosed *Transportation Assessment Report*.

17.7.12 Bicycle Parking

- *The Planning Authority will require the provision of a minimum level of covered bicycle parking facilities in association with new developments and the change of use of an existing property. Where the provision of covered bicycle parking facilities are intended for use by the staff of that particular development, stands should be located within the curtilage of the development to ensure security and supervision. Covered bicycle stands for use by visitors should be located to maximise convenience to the entrance of buildings and positioned so as to ensure safety, security and supervision;*
- *In residential developments without private gardens or wholly dependent on balconies for private open space, covered bicycle stands should be provided in private communal areas;*
- *The bicycle parking standards set out in Table 7.2 below shall apply*

Bicycle parking standards Table 7.2

Type of Development	Cycle Parking Standard
Residential units	1 space per bedroom + 1 visitor space per 2 units
Shops	1 space for every 10 car space
Supermarkets / large stores	10% of total car spaces subject to a minimum provision of 50 spaces
Offices	20% of employee numbers subject to minimum of 10 bicycle places or one bike space for every car space, whichever is the greatest.
Industry / warehousing	20% of employee numbers
Theatre, cinema, church, stadium	1 space for every 100 seats
Hotels, guest houses	1 space per 20 bedrooms
Lounge bars	10% of total car spaces subject to a minimum of 10 spaces
Restaurants	10% of total car spaces subject to a minimum of 10 spaces
Playing fields	1 space for every 3 players
Schools	20% of pupil registration numbers/minimum of 10 spaces
Nursing homes	20% of employee numbers
Multi-Storey Car Parks	10% of total car spaces/minimum provision of 50 spaces
Public Transport pick up points/interchanges	10% of number of daily borders at that point/station, minimum of 10 bicycle spaces

Response: The residential element of the scheme requires comprises 139 apartments accommodating 260 bedrooms. This generates a requirement for 330 cycle parking spaces in accordance with Table 7.2. The proposal provides 260 secure spaces in 2 bicycle stores and 70 visitor spaces at surface level, a total of 330 spaces.

17.7.13 Social Impact Assessment

In preparing a Social Impact Assessment the following services/facilities should be taken into consideration:-

➤ *Education*

- Evaluation of number of new students likely to be generated by the proposed development having regard to Department of Education estimates
- Identification of existing primary and secondary facilities in the area, distance from the application site, road/cycle network / public transport facilities between the locations
- Details of school capacities, existing number of students and capacity for new intake

➤ *Childcare*

- Evaluation of number of new pre-school age (0-5) children likely to be generated by the proposed development
- Identification of existing childcare and pre-school facilities in the area, distance from the application site, road network / public transport facilities between the locations
- Details of capacities of existing facilities, existing number of children enrolled and capacity for new intake

➤ *Open space, play and recreation*

- Identification of existing public active open spaces and sports clubs in the area, distance from the application site, road network / public transport facilities between the locations
- Evaluation of suitability of these facilities to meet the needs of the projected population of the development, having regard to the following proportions:

Response: A *Social Infrastructure Audit*, which provides details of the above has been prepared and is enclosed with the planning application.

17.8 Conclusion

The proposal is consistent with the policies and objectives of the Wicklow County Development Plan 2016-2022. The proposal may be considered to contravene the requirements for Public Open Space. This matter is addressed in the enclosed *Material Contravention Statement*.

18. Statement of Consistency – Local Area Plan

For the purposes of Section 5(b)(i) the relevant Local Area Plan to be considered is the *Bray Municipal District Local Area Plan (BMDLAP) 2018-2022*.

18.1 Vision and Development Strategy

The vision for the Bray Municipal District is *‘to be a cohesive community of people enjoying distinct but interrelated urban and rural environments; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.’*

Response: The proposal will provide high quality homes in an established urban setting, enhance the choice of housing in Bray, contribute to social and community infrastructure and provide employment opportunities in the new commercial units.

18.1.1 Population and Housing

Table 2.6 of the Bray Municipal District Local Area Plan provides the population targets for Bray up until 2028.

Settlement	2022	2025	2028
Bray	36,237	38,119	40,000
Enniskerry	2,302	2,401	2,500
Kilmacanogue ¹⁰	1,012	1,038	1,065

Source: Bray Municipal District Local Area Plan

Table 2.7 provides the housing stock targets for Bray up until 2025.

	Bray	Enniskerry	Kilmacanogue	Rural Area
2016 Population	29,624	1,889	934	3,230
2016 Housing Stock	11,225	640	374	1,051
2025 Housing target	17,651	1,112	481	-
Growth	6,426	472	107	-

Source: Bray Municipal District Local Areal Plan

Response: The proposal will provide 139 no. apartment residential units. At an average occupancy rate of 2.5 persons per unit (NPF prediction), the proposal could accommodate approximately 350 people.

18.1.2 Residential Development Strategy

The residential development strategy for Bray includes the following components:-

- *To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish;*
- *To promote and facilitate the redevelopment of sites in town centres, including identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre*

Response: The proposal is consistent with the residential development strategy by redeveloping an under-utilised opportunity site.

18.2 Zoning and Land Use

18.2.1 Zoning

The Core Site Area is outlined in blue on the zoning map extract below. The majority of the site is zoned TC Town Centre (coloured red). A small area in the north-east corner is zoned R-HD New Residential (coloured brown).

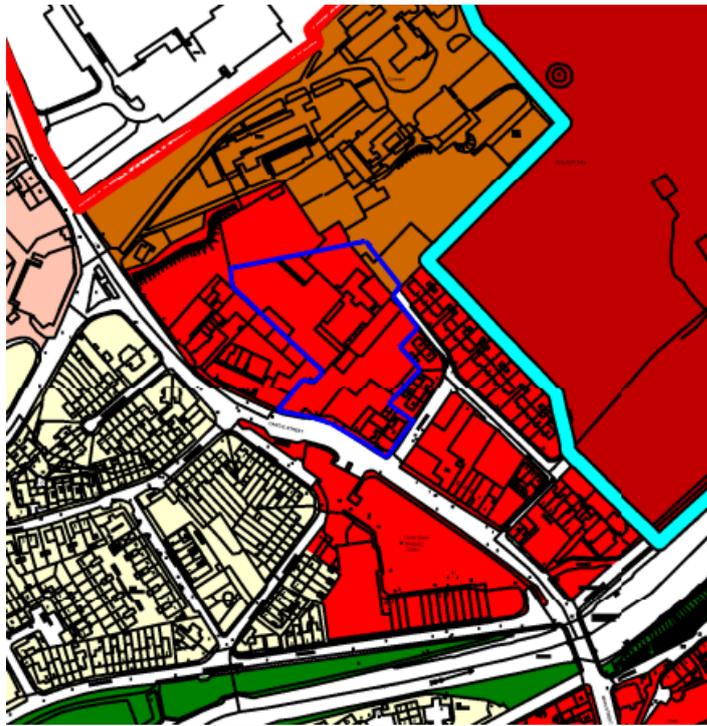


Figure 20: Extract from Map 2 Bray Town & Environs Land Use Zoning

The proposal is consistent with the zoning objective set out below.

ZONING	OBJECTIVE	DESCRIPTION
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation.	To develop and consolidate the existing town centres to improve vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise town centre conservation, ensure priority for public transport where applicable, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing centres' fabric.
R-HD: New Residential – High Density	To protect, provide and improve residential amenities in a high density format.	To facilitate for the provision of high quality, high density new residential developments with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.

18.2.2 Appropriate Land Use

Uses generally appropriate for town centres include **retail, retail services**, health, **restaurants**, public house, public buildings, hotels, guest houses, nursing / care homes, parking, **residential development, commercial**, office, tourism and recreational uses, **community**, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP.

It is anticipated that the 2 no. commercial units may be used for retail, retail services or café/restaurant. Therefore, all proposed uses are consistent with the TC zoning objective.

The small area zoned New Residential will accommodate outdoor circulation space associated with the apartments and a pedestrian link to the future Southern Access Road, and is therefore consistent with the zoning objective.

18.3 Residential Development

RI All new housing developments shall be required to accord with the housing objectives and standards set out in the Wicklow County Development Plan.

Response: Compliance with the objectives and standards of the Wicklow County Development Plan is demonstrated in Section 14.

R2 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.

Response: The BMDLAP does not specify a density for the subject site. However, the proposal accords with the principle of making efficient use of town centre land.

R3 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. 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.

Response: Please refer to the enclosed *Social Infrastructure Audit* for details of social and community infrastructure located in proximity to the site. The proposal seeks to enhance social and community infrastructure by providing a creche and community facility.

R4 To encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.

Response: The proposal is consistent with the residential development strategy by redeveloping an under-utilised opportunity site to accommodate higher density.

18.4 Town Centre / Retail

RT3 *To promote developments which reinforce the role and function of the 'core retail area' as the prime shopping area of town centres. The 'core retail area' shall be promoted as the area of first priority for new retail development. In settlements where no 'core retail area' is defined, regard shall be paid to the designated 'town centre' area, the location of the traditional/historical centre and the location of other retail units. Where an application is made for a new development with street frontage either in the defined retail core of a larger settlement or on the 'main street' of a smaller town, retail or commercial use will normally be required at street level.*

Response: The site is zoned Town Centre but is outside the defined Core Retail Area. The proposal provides commercial use at street level.

BT1 *To promote Bray town centre as the primary retailing and commercial sector location in the town. Retailing will be promoted as the core function of the town centre. Bray Town Centre consists of the area of land which is zoned 'TC: Town Centre Uses', which extends in a north/south direction from the Dublin Road to Market Square, and in an easterly direction, encompassing Quinsborough Road, Florence Road, Bray Dart Station and part of Novara Avenue. It is the area of the town that provides a broad range of facilities and services and which fulfils a function as a focus for both the population of Bray and public transport.*

Response: The commercial element of the scheme will enhance the role of Bray town centre as the primary commercial sector.

BT3 *Generally, a height of 4 storeys (including ground floor) will be considered appropriate in the Bray 'town centre' zone, irrespective of adjoining property heights. However, the Council may permit heights above this, where the specific context of the site and the design of the building allow it (for example where additional storeys are set back from street frontage).*

Response: The proposed buildings range in height from 1 to 7 storeys. The taller building, Block A, is set back from Castle Street. The Castle Street frontage comprises the single storey pavilion building, while Block B steps down from 6 storeys to define the entrance to 4 storeys at Dwyer Park.



Figure 21: CGI of Castle Street frontage

18.5 Opportunity Site

Part of the site is subject to *Objective OP2 Former Heiton Buckley's, Dublin Road.*



Figure 22: Map OP2 with site outlined in red

To provide for a mixed use development including commercial, retail, residential, community and cultural uses;

- *Active commercial, community or cultural uses will generally be required at ground and street levels, with residential use above, other than (a) along the Dwyer Park frontage and (b) on the truncated northernmost sector of the site.*
- *A high density development, that makes the best use of this serviced urban land will be expected, in a 3-4 storey development;*
- *The design (including height) of any development shall pay particular regard to the height of immediately adjoining (mostly 2-storey) residences and in general heights shall not exceed 3-storeys along Dwyer Park;*
- *Any development on the lands shall include street frontage directly onto Castle Street, ideally with limited set back across the frontage of the site; (other than that required for adequate pedestrian / cyclist usage); any set back in excess of 5m from the road kerb will require to be justified based on specific design criteria and in any event buildings shall not be set back any further than 15m from the kerb.*

- *Those parts of any proposed development that adjoin existing streets shall provide for an active street frontage that addresses and connects with the public domain.*

Response: The proposed development has been designed largely in accordance with Objective OP2 by providing: -

- Active commercial uses at street level along Castle Street;
- A dedicated community facility on Castle Street;
- High density residential development throughout the site;
- Heights of 1-3 storeys where the buildings are closest to Dwyer Park;
- A strong urban edge to the public realm, which also facilitates future road widening for Bus Connects. The inner footpath line after Bus Connects is indicated on the Proposed Ground Floor Plan and will

The proposal exceeds the building height specified in OP2. Taller elements of up to 7 storeys have been designed in response to the site context, which benefits from an open outlook to the north. A *Material Contravention Statement* in relation to height is enclosed.

18.6 Community Development

CD2 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.

Response: There is designated play integrated into the perimeter garden walkway, including a kick about area, with rebound wall and climbing wall, basketball net, teenage and toddler play equipment. There is also natural play occurring throughout the proposed landscape.

18.7 Built and Natural Heritage

18.7.1 Built Heritage

Map H1 identifies part of the site as an Area of Archaeological Potential.

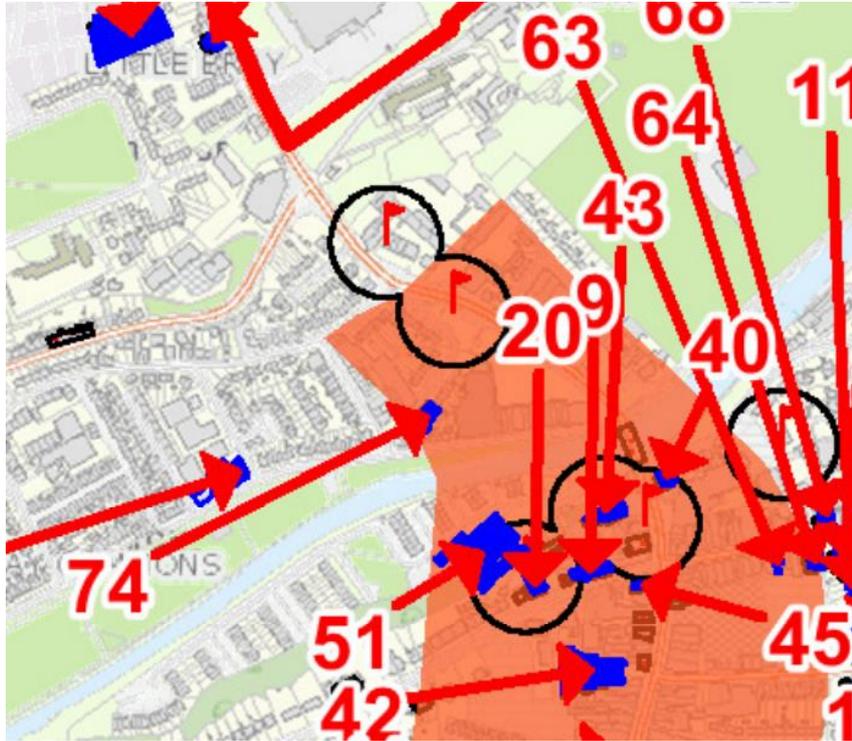


Figure 23: Extract from Map H3 – Bray Settlement Built Heritage

Response: An *Archaeological Impact Assessment* prepared by Shanarc is enclosed.

18.7.2 Biodiversity Objectives

B1 To ensure that the impact of new developments on biodiversity is minimised and to require measures for the protection and enhancement of biodiversity in all proposals for large developments.

Response: Potential impacts on biodiversity are considered in the enclosed *Ecological Impact Assessment* prepared by Enviroguide.

B2 No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements,

*duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this plan (either individually or in combination with other plans or projects)*³⁰.

Response: Potential impacts on Natura 2000 sites are considered in the enclosed *Appropriate Assessment Screening Statement* prepared by Enviroguide.

B3 *To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Wicklow.*

Response: Potential impacts on designated sites are considered in the enclosed *Appropriate Assessment Screening Statement* prepared by Enviroguide.

18.7.3 Green Infrastructure

GII New development and redevelopment proposals, where considered appropriate, are required to contribute towards the protection, management and enhancement of the existing green infrastructure assets and corridors of the local area in terms of the design, layout and landscaping of development proposals.

Response: Currently the site is primarily occupied by buildings and hard surfaces and the proposed landscape will significantly improve the green infrastructure on the site. The NMP *Landscape Design Statement* includes analysis of how the proposal ties into the existing green infrastructure network in Bray.

18.8 Infrastructure

Road Objectives R05 and R09 are relevant to the subject site:-

R05	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.
R07	To improve (as funding allows) the following roads in Bray MD, and ensure developments along these routes are so designed as to allow for / not impede the delivery of required improvements: <ul style="list-style-type: none">- Castle Street – Dublin Road- Vevay Road- Novara Avenue- Seapoint Road- Killarney Lane- Kilbride Lane- Ballyman Road from County Brook to the R117

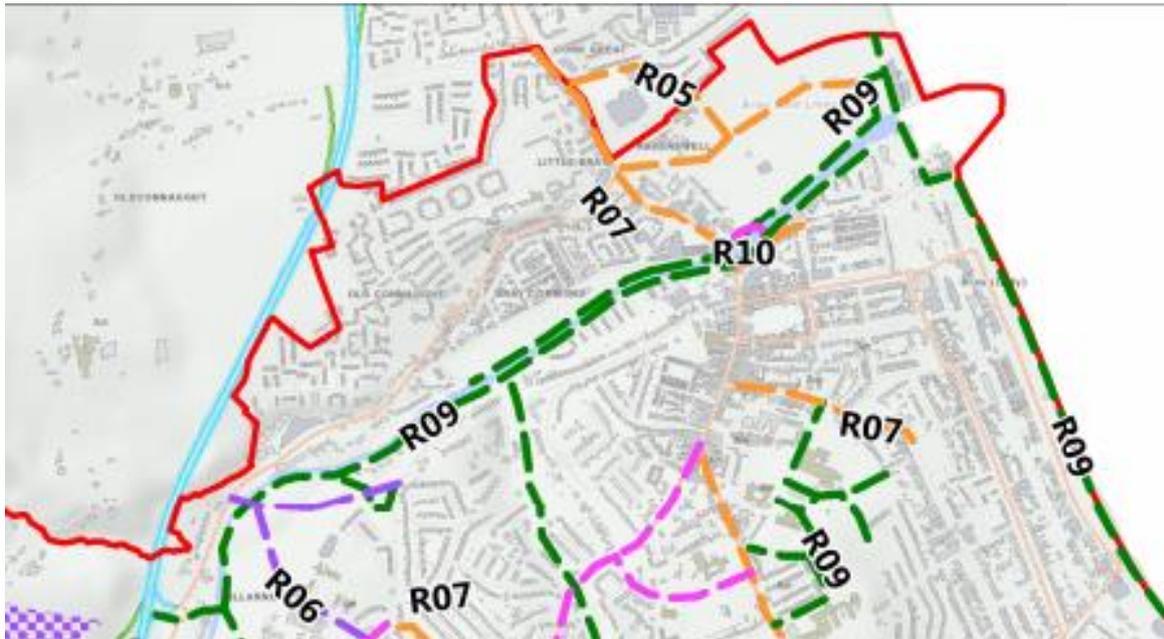


Figure 19: Extract from Map TO1

Response: The scheme is designed to facilitate future road widening on Castle Street as required for Bus Connects. The northern site boundary interfaces with the reservation for the Southern Access Route, which is indicated on the Proposed Site Plans.

18.9 Conclusion

The proposal is consistent with the policies and objectives of the Bray Municipal District Local Area Plan 2018-2024, with the exception of the height parameters outlined in Objective OP2.

19. National and Regional Planning Policy

The following relevant National, Regional and Section 28 Guidelines are assessed below:-

- Project Ireland 2040: National Planning Framework (2018)
- Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly (2018)
- Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)
- Urban Development and Building Heights Guidelines for Planning Authorities (2018)
- Sustainable Residential Development in Urban Areas (2009)
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and Urban Design Manual
- Design Manual for Urban Roads and Streets (2013)
- The Planning System and Flood Risk Management (2009)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Architectural Heritage Protection (2011)

19.1 Project Ireland 2040 – The National Planning Framework

The National Planning Framework (NPF) was published in February 2018.

The NPF signals a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located. There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside, with a target of at least 40% of new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.

Objective 27 – seeks to 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.

Objective 33 – seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Objective 35 – seeks to increase densities 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.

National Policy Objective 11 of the NPF states that *“in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

The proposed residential development is located in Bray town centre and within walking distance of services, amenities and public transport. It is therefore considered that the proposal is appropriate for the site and will assist in achieving the broad objectives of the NPF by concentrating development in an existing urban area and reducing urban sprawl by regenerating brownfield land.

19.2 Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly (2018)

The *Eastern Midland Regional Assembly Regional Spatial and Economic Strategy* (EMRA RSES), published in November 2018 supports the implementation of National Policy Objectives and targets contained in *Project Ireland 2040 – National Planning Framework* (NPF) and alignment with the investment priorities of the *National Development Plan 2018-27* (NDP).

The Dublin Metropolitan Area (DMA) covers the continuous built-up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, **Bray** and Greystones, which have strong connections with the city. Bray is designated as a Key Town within the regional settlement strategy.

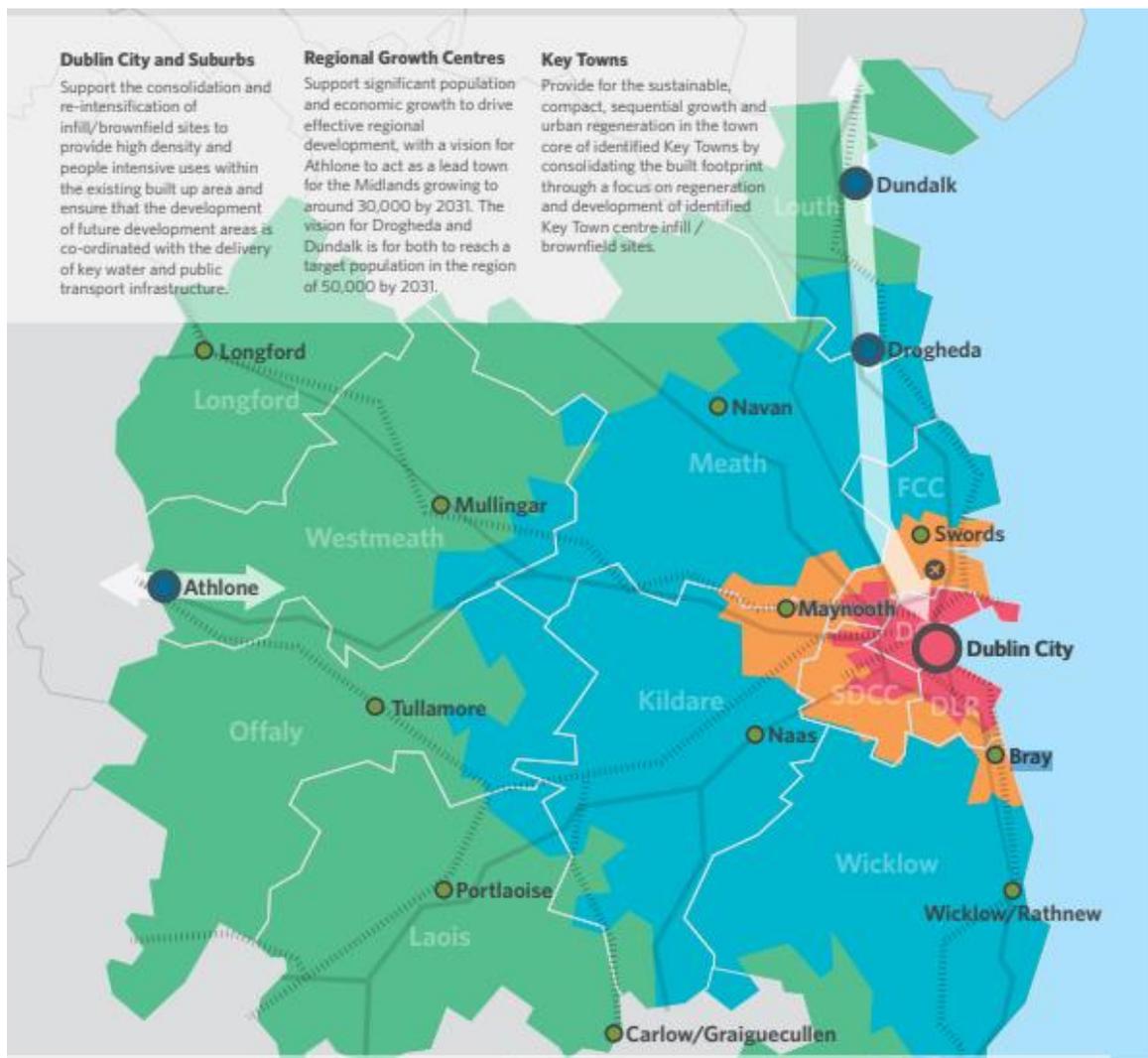


Figure 20: RSES Settlement Strategy

The Metropolitan Area Strategic Plan (MASP) sets out a strategy to achieve growth to 1.65 million people in the Dublin Metropolitan Area by 2031 through the delivery of large-scale strategic development areas.

The RSES strongly supports the consolidation and re-intensification of infill, brownfield and underutilised lands, including older industrial areas in the DMA, supported by improved public transport.

The following Regional Objectives of the EMRA RSES are applicable to the proposed development:-

- **RPO 5.4:** Future development of strategic residential development areas within the Dublin Metropolitan Area shall provide for higher densities and qualitative

standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.

- **RPO 5.5:** Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

The proposed development is in accordance with the RSES as it consolidates development on an underutilised site within the Key Town of Bray.

It is a policy objective RPO 4.3 of the RSES to *‘support the consolidation and reintensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.’*

A guiding principle of the Dublin Metropolitan Area relates to ‘integrated transport and land use’ and it is an objective to *“target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including BusConnects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.”*

The proposed development is in accordance with the EMRA RSES as it provides a residential development within an existing metropolitan urban area. The development is located on one of the largest underdeveloped town centre sites in Bray that can be developed without resulting in urban sprawl and with good access to modes of public transport.

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

The overarching aim of this Action Plan is to ramp up delivery of housing from its current undersupply across all tenures 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.

This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

The proposed development will directly contribute to the targets of residential construction by providing 139 no. residential units, 10% of which will be provided as social housing. Please refer to the enclosed Part V booklet for further details.

The proposed development broadens the pattern of tenure in the locality, which is predominately made up of private single house family ownership.

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

These guidelines promote the delivery of sustainable residential developments and provide guidance on the principles of urban design. The sections of these guidelines which are applicable to the proposed development are extracted below.

19.4.1 The Role of Design

This chapter sets out the core principles of design and the many strands of place-making, environmental responsibility, social equity and economic viability that are required when creating places of high quality and distinct identity.

The proposed development has been designed in accordance with the ‘Best Practice Manual Design Criteria’ and the ‘Urban Design Manual’. Consideration of the 12 criteria is set out below.

CRITERIA	RESPONSE
1. CONTEXT	The unique context of the site has been carefully considered with both its constraints and opportunities informing the design in all aspects in terms of response to streetscape and landscape both existing and proposed, siting and heights of buildings relative to its environs and the access and routes along its boundaries on Castle Street and Dwyer Park.
2. CONNECTIONS	Vehicular, pedestrian and cycle access is provided. Pedestrian and cyclist access points are provided at 3 locations on the site at both Castle Street and Dwyer Park. Vehicular access to the carpark and creche drop off spaces is provided along Castle Street. Pedestrian linkages are allowed for throughout the development- resulting in a highly permeable scheme.
3. INCLUSIVITY	The proposed development has been designed with the principles of universal design to allow accessibility for people of a range of ages and physical mobility. The scheme is easily accessed by foot or by bicycle. The public realm is designed to ensure accessibility on equal terms for people of all ages and physical mobility. The apartments blocks are provided with lifts and all residential units will be fully accessible.
4. VARIETY	This development will provide apartments, commercial spaces and community rooms that will cater for a wide range of people, from families to single person occupancies. The various communal spaces are designed to provide amenity for all age groups. The apartments are proposed in 2 Blocks containing a mix of 1, 2 & 3 bedroom units. A communal podium level garden along with the north and south gardens is provided for apartment residents to use for various activities while also promoting passive surveillance. Residential amenity is also proposed as part of the development and integrated throughout the proposed development. A mix of activities is provided through the series of open spaces which all residents have direct access to. Within these open spaces a variety of activities will be provided. These include playground areas, community gardens, foraging and free play spaces.
5. EFFICIENCY	The apartments have been designed in accordance with the guidelines set out in Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018). (Please refer to the Schedule of Accommodation included with this application for details of apartment sizes and room areas).
6. DISTINCTIVENESS	The proposed buildings will create a distinctive urban form for the local area. The overall design proposal will provide a strong architectural form and rhythm along its boundary at castle Street and facing onto Dwyer park. The architectural facade materiality response is a palette of high quality materials which will compliment adjacent developments but which will also provide the development with its own unique architectural character.
7. LAYOUT	The proposed development creates a medium- density residential development appropriate to the location. The scheme is in line with the national and local planning policy. The buildings are orientated according to the existing boundaries and in order to maximize, for all units, the availability of high quality daylight and sunlight. The proposed allow all units benefiting from east, west or south facing living spaces. The apartments units are a mix of single, dual & triple aspect with separation distances which have been maintained in accordance with best practice in terms of overlooking, minimum 22 m between each block. All units will be designed to have good levels of thermal performance, comfort, daylight and sound insulation.
8. PUBLIC REALM	The public realm is defined by a variety of public open spaces and routes and are specified with high quality hard and soft landscaping throughout. Communal open spaces serving the apartments contributes to the high-quality public realm proposed and provide maximum permeability for both pedestrians and cyclists through the site using a series of high quality landscaped open spaces.
9. ADAPTABILITY	The layouts unit type while specific provide a range of occupancy type. The proposed plan arrangement also allows for flexibility and adaptability into the future for the user.
10. PRIVACY & AMENITY	All storage, balconies and ground floor private terraces are provided to all apartments in accordance with Design Standards for New Apartments - Guidelines for Planning Authorities 2018. Each apartment has a balcony or terrace area which is accessed from the main living space. Storage is provided within each of the units as indicated on the drawings. Please refer to the HQA in this document for specific details of all areas within each unit.
11. PARKING	Car parking spaces are proposed for residents at ground level under the podium garden. 5% of the overall number of car park spaces are allocated for disabled car park spaces and the required number of vehicle electric charge points will be provided. 3 no. drop off spaces for the creche have also been included within the site. Bicycle parking for apartments is proposed in secure and sheltered location as indicated on the drawings. Visitor bicycle parking is also catered for through out the site.
12. DETAILED DESIGN	The design strategy is to create buildings within a scheme which works together as an entity but can also be read as a whole. The massing and geometry tie into its surrounding using the traditional material of brick in subtle tonal changes throughout. The elevations are composed to compliment the contemporary architecture principles of proportion, scale and materiality. The entire scheme - both the buildings and the public realms and landscaped areas will be finished to a high standard of materials suitable for the unique context and location of the scheme.

19.4.2 Provision of Community Facilities

Schools

No substantial residential development should proceed without an assessment of existing schools capacity or the provision of new school facilities in tandem with the development.

Please refer to the enclosed *Social Infrastructure Audit* enclosed with the application documents. Further details of school capacity will be provided at planning application stage.

Childcare

Guidelines recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units.

A crèche facility is proposed in the subject proposal. The creche facility is located on the ground floor of Block A and has a floor area of c.220m². The creche facility will have the capacity to cater for approximately 28 no. children. It is considered that along with the childcare facilities already operating in the Bray area and the proposed creche that there will be sufficient capacity to cater for any childcare demand arising from the subject development.

Community Centres

Community centres can act as a focus in helping to create a vibrant community, and their timely and accessible provision will contribute to the quality of life to be enjoyed by the residents.

The proposal provides a community facility as a planning gain.

19.4.3 Efficient use of resources

Efficient use of land

It is set out in these guidelines that land is a scarce resource and should be used as efficiently as possible.

The proposal will provide a high-density residential development at an appropriate location close to public transport and the Town Centre.

Sustainable travel patterns

The NSS definition of sustainable development includes “maximising access to and encouraging use of public transport, cycling and walking”

The subject site is ideally located adjacent to a bus corridor and within walking distance of DART. Public transport will be further enhanced on Castle Street with the roll out of Bus Connects.

19.4.4 Amenity/quality of life issues

Public open space

It is acknowledged in the guidelines that public open space needs to be appropriately designed, properly located and well maintained to encourage its use. The following criteria are set out for public open spaces:-

- Design – the layout and facilities should be designed to meet a range of user needs, including both active and passive recreation
- Shared use – the potential for maximising the use of open space facilities should be explored
- Biodiversity – public open spaces should provide for a range of natural habitats and can facilitate the preservation of flora and fauna.

In relation to quantitative standards on large infill or brownfield sites, public open space should generally be provided at a minimum rate of 10% of the total site area.

The proposal provides c.1,600m² of open space at ground and podium levels, which equates to c. 19% of the core site area (8,594m²). The spaces are of sufficient size to be functional amenity spaces.

Personal safety

The ability to live with a feeling of comfort and safety in the residential area is an essential component of sustainable communities.

All areas of open space are overlooked by the proposed apartments.

Traffic safety

Design features should ensure that wherever possible appropriate traffic speeds and movements should be managed by the arrangements of buildings and spaces, and the appropriate use of surface materials.

The provision of all car parking at undercroft level ensures the safety of those using the landscaped spaces as they are not compromised by moving vehicles.

Conservation of the built and natural environment

The guidelines indicate that the focus should be on retaining and enhancing the natural setting.

The site comprises yards and buildings with little existing vegetation. This will be replaced with high-quality landscaping.

19.4.5 Checklist

- *Are the lands proposed for development in accordance with the sequencing priorities set out in the development plan or local area plan?*

The site is zoned for Town Centre development and identified as an Opportunity Site.

- *Have the other necessary agencies inputted into the plan/development proposal?*

Pre-planning consultation was undertaken with Wicklow County Council. The design team engaged with consultants acting on behalf of NTA in relation to Bus Connects. Irish Water has been consulted and has provided a feasibility of service letter.

- *Is there an appropriate range of community and support facilities, when and where they are needed?*

Please refer to the *Social Infrastructure Audit* enclosed for details.

- *In the case of higher density schemes, is there adequate existing public transport or will it be provided in tandem with development?*

Excellent public transport is provided in close proximity to the site.

19.4.6 Larger Towns and Cities

Design Safeguards

The objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

The subject site is a vacant site located in a key urban centre. The proposed development provides a more efficient and sustainable use of the land.

Public transport corridors

The minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops, and decreasing with distance away from such nodes.

The proposed development provides a sustainable density of 162 units per hectare.

19.4.7 Implementation

Pre-application discussions are encouraged so that there is clarity around sequencing priorities of the development plan, the vision statement and phasing objectives of the local area plan.

A pre-application meeting took place on 19 March 2021 with Wicklow County Council , as detailed in Section 1.2 above.

19.5 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

The Government has committed in ‘*Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020*’ to reduce the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key targets are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;

- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

It is identified in the Smarter Travel Plan that local authorities should ensure that safe walking and cycling routes to and from schools and other educational institutions are identified and implemented. In order to achieve the targets of the Smarter Travel Plan, better alignment between land use and transport is required.

The site is supported by excellent public transport and a good network of pedestrian and cycle routes, which will be further enhanced in the future. Further details are provided in the enclosed *Transportation Assessment Report*.

19.6 Transport Strategy for the Greater Dublin Area 2016 – 2035

This strategy has been prepared by the National Transport Authority and sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy.

The proposed development is located in close proximity to existing good quality public transport, including several Dublin Bus routes (Bus Connects) and the Bray DART Station.

19.7 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The *Urban Development and Building Heights Guidelines 2018* were published in December 2018. The Guidelines recognise that “*increasing prevailing building heights therefore has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale*

and density of development and our planning process must actively address how this objective will be secured”.

The Guidelines take precedence over blanket height limitations in Development Plans. The guidelines recognise that *“it is Government policy that building heights must be generally increased in appropriate urban locations.”*

Strategic Development Zones and high capacity public transport corridors are recognised as locations suitable for increased building height:-

In general terms therefore, maximum building heights in city and town centre areas have tended towards the range of six to eight storeys, which have been exceeded in only a limited number of locations. These locations have generally been identified in strategic planning policy terms as being suitable for buildings that are significantly taller than the prevailing and/or traditional building heights as in the case of strategic development zones and high capacity public transport nodes (Para. 1.8).

The subject site is a designated redevelopment opportunity site. Building heights range from 1-storey to 7-storey across the site.

19.7.1 Public Transport

The Guidelines note that substantial investment in public transport infrastructure is a key tenet of Project Ireland 2040, particularly in cities and towns through investment in a range of modal solutions, including rail, Metrolink, LUAS, Bus Connects and walking and cycling networks.

In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of developing sustainable mobility corridors and networks (Para. 2.4).

19.7.2 Placemaking

The Guidelines also note that taller buildings can also assist in reinforcing and contributing to a sense of place, such as indicating the main centres of activity, important street junctions, public spaces and transport interchanges. In this manner, increased building height is a key factor in assisting modern placemaking and improving the overall quality of our urban environments (Para. 2.5).

Applying these planning principles to the subject site, it is submitted that the proposed density and height are appropriate.

In terms of public transport, the site is located c. 800m from the Bray DART station and directly adjacent to a Bus Connects corridor. Such locations are rare and such sites are finite in the Dublin Metropolitan Area. National guidance is clear that increased density and height at such locations is required to optimise the effectiveness of the investment in infrastructure and to reduce unsustainable travel.

The Guidelines also recognise the role of taller buildings in terms of placemaking and improving the overall quality of our urban environments. The 7-storey element of the scheme will define the future Southern Access Road, while the 6 storey element on Castle Street marks the entrance to the scheme.

19.7.3 Development Management

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* (Para. 3.1).

Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Requirement	Comment
Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?	The proposed development seeks to provide a high density infill development in a key urban centre, which is zoned Town Centre. The development will deliver compact growth in the MASP area.
Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?	Please refer to Sections 17 and 18 of this report for further detail on compliance with the objectives of the relevant Development Plan and Local Area Plan.
Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?	The height limit of 4 storey as contained in the Local Area Plan is considered to be inconsistent with these Guidelines, insofar as the site is located in Bray town centre where additional height can be achieved while protecting residential and visual amenities.

In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanala, that the proposed development satisfies the following criteria:

At the scale of the relevant city/town

Requirement	Comment
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is well served by DART and bus public transport. The enclosed <i>Transportation Assessment Report</i> includes an assessment of Bus and DART capacity and demand which concludes that additional demand for public transport services as a result of the proposed development can be accommodated on the existing services.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its	A <i>Landscape & Visual Impact Assessment</i> prepared by Arc is enclosed with the application. The assessment notes that the position of the site on lower ground greatly reduces the potential visibility of the development.

cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	
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.	The scheme will provide an attractive new streetscape to Castle Street, enhance the public realm, create new open spaces and provide an appropriate transition in scale towards Dwyer Park.

At the scale of district/ neighbourhood/ street

Requirement	Comment
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	The proposed development will redevelop a vacant brownfield plot with a high-quality mixed use scheme, the scale of which will contribute to a sense of place in this part of Bray. The ground floor uses will ensure the development engages with the streetscape.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The scheme uses a staggered building line, graduated height and different materials to create an attractive design.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “ <i>The Planning System and Flood Risk Management – Guidelines for Planning Authorities</i> ” (2009).	The site occupies a prominent location on the main thoroughfare to Bray from the north. The scale of buildings is considered appropriate to define the street.
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.	The proposal will provide a taller building at an appropriate location at the confluence of Castle Street and the future Southern Access Route and at a Gateway location to the defined town centre.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The proposed development will broaden the housing tenure in the area, which is dominated by traditional housing.

At the scale of the site/building

Requirement	Comment
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.	The proposed development has been carefully designed to sit into the context of the existing site, with a gradual increase in scale away from Dwyer Park.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's ' <i>Site Layout Planning for Daylight and Sunlight</i> ' (2 nd edition) or BS 8206-2: 2008 – ' <i>Lighting for Buildings – Part 2: Code of Practice for Daylighting</i> '.	A <i>Daylight and Sunlight Assessment</i> is enclosed and takes account of these criteria.

The urban design rationale for the proposed development is considered in greater detail in the enclosed *Architectural Design Statement* prepared by HJL Architects.

Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required and these may include:

Requirement	Comment
Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A <i>Microclimate Wind Analysis and Pedestrian Comfort Report</i> prepared by IN2 is submitted with the application. The assessment concludes that ground level spaces and courtyard amenity spaces within the proposed development are predominantly suited to "Pedestrian Sitting/Standing", in accordance with the Lawson Criteria methodology utilised.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	Please refer to the <i>Ecological Impact Assessment</i> prepared by Enviroguide, which includes details of a bat survey on the subject lands.
An assessment that the proposal allows for the retention of important	The proposal is 7 storeys at its highest point and is positioned on lower ground in

telecommunication channels, such as microwave links.	relation to the surrounding area. Existing telecommunications infrastructure ¹ is located on significantly higher ground to the north (c.500m on industrial buildings) and south (c. 300m on the 6-storey Royal Hotel). It is therefore considered the proposal would not have an impact on telecommunication channels.
An assessment that the proposal maintains safe air navigation.	The proposal is 7 storeys at its highest point so it is therefore not considered the proposal would have an impact on air navigation.
An urban design statement including, as appropriate, impact on the historic built environment.	Please refer to the <i>Architectural Design Statement</i> prepared by HJL Architects. Potential impact on the historic built environment is addressed in the <i>Outline Architectural Heritage Impact Assessment</i> prepared by Arc.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	An <i>AA Screening Report, EIA Screening Report and Ecological Impact Assessment</i> have all been prepared by Enviroguide Consulting and are enclosed.

Where the relevant Planning Authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).

SPPR 3

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;***

¹ ComReg Site Viewer accessed 26 April 2022

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 complies with SPPR 3 of the *Urban Development and Building Height Guidelines* and supporting documentation to demonstrate compliance with these guidelines is enclosed as referred to above.

It is an objective of the NPF to greatly increase the levels of residential development in urban centres and the planning process, at both local authority and An Bord Pleanála levels, will assist in achieving this objective. It is envisaged that increasing the level of residential development in urban areas, particularly our cities and large towns, will be facilitated through significant increases in building heights and overall densities. These guidelines recognise that “*it is Government policy that building heights must be generally increased in appropriate urban locations.*”

Bray is a large coastal town that is well served by public transport modes. It is submitted that the subject proposal, which ranges in height from 1 to 7 storeys is appropriate for the subject lands and is in accordance with the *Urban Development and Building Height Guidelines* outlined above.

19.8 Sustainable Urban Housing: Design Standards for New Apartments (2020)

These guidelines contain a number of Specific Planning Policy Requirements (SPPRs) which are applicable to the subject development. Each of these is outlined below along with a commentary on how the proposal has been designed in accordance with each.

19.8.1 Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

Response: The proposed development complies with SPPR 1 as 24% of the units provided on the site are 1-bed units. No studio units are proposed as part of the development.

The unit mix is as follows:-

- 33 no. 1-bed units (24%);
- 91 no. 2-bed units (65%);
- 15 no. 3-bed units (11%);

19.8.2 Specific Planning Policy Requirement 2

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;
- Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;
- For schemes of 50 or more units, SPPR 1 shall apply to the entire development.

Response: The subject development is located on a site with a nett site area of 0.86ha, it is therefore considered that SPPR 2 is not applicable to the subject site.

19.8.3 Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq.m

Response: Please refer to the enclosed Housing Quality Assessment (contained in the *Architectural Design Statement*) and Floor Plans prepared by HJL Architects for details of apartment floor areas. All of the apartments proposed in the subject scheme exceed the above requirements by >10%.

19.8.4 Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (1) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

Response

The proposal provides 63 no. dual/triple aspect units, which equates to 45%. This comfortably exceeds the minimum requirement of 33% for central urban locations.

4 no. units are considered to be north-facing, as shown on the Aspect Diagrams in the *Architectural Design Statement*. These units benefit from an outlook over southern amenity garden and part of the podium amenity.

19.8.5 Specific Planning Policy Requirement 5

Ground level apartment 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. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Response: All ground floor apartments have a floor to ceiling height of 2.7m.

19.8.6 Specific Planning Policy Requirement 6

A maximum of 12 apartments per floor per 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 0.25ha, subject to overall design quality and compliance with building regulations.

Response: Block A is served by 2 cores, serving a maximum of 20 units per floor.

Block B is served by 1 core, serving a maximum of 12 units per floor.

19.8.7 Internal Floor Areas

The apartments have been designed in accordance with “Sustainable Urban Housing – Design Standards for New Apartments” published by the Department of Housing, Planning and Local Government in December 2020. All units meet and/or exceed standards in terms of overall floor area, storage, living and bedroom areas/widths.

19.8.8 Internal Storage

Minimum storage space requirements

Studio	3 sq m
One bedroom	3 sq m
Two bedrooms (3 person)	5 sq m
Two bedrooms (4 person)	6 sq m
Three or more bedrooms	9 sq m

No individual storage room within an apartment should exceed 3.5m².

These guidelines for storage in individual units have been adhered to and further detail is contained in the Housing Quality Assessment.

19.8.9 Private Amenity Space

Minimum floor areas for private amenity space

Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines.

The requirements for private amenity space and balcony depths have been adhered to. Further detail on private amenity space is contained in the Housing Quality Assessment.

19.8.10 Refuse Storage

Provision shall be made for the storage and collection of waste materials in apartment schemes.

Bin storage is provided at undercroft level.

19.8.11 Communal Amenity Space

The main communal amenity space is centrally located within the development and is accessible from both blocks. Two smaller amenity spaces are located at either end of the site. The character and function of each space has been carefully considered and is described in the *Landscape Design Statement*.

In accordance with the Guidelines, *Sustainable Urban Housing Design Standards for New Apartments*, 937m² of communal amenity space is required for the proposed scheme. A total of 1,599m² is provided in the scheme, which greatly exceeds the standard required.

<i>Unit Type</i>	<i>Communal Space Standard</i>	<i>Provision</i>
1-bed	33 x 5 = 165sqm	
2-bed	91 x 7 = 637sqm	
3-bed	15 x 9 = 135sqm	
Total	937sqm	1,599sqm

19.8.12 Bicycle Parking

- *Location* – cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather.
- *Quantity* – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.
- *Design* – cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not

feasible, within an adjacent or adjoining purpose built structure of permanent construction.

- *Management* – an acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking, in particular, avoiding arrangements that lead to a significant number of lockers being left locked whilst empty for instance. It is essential that as far as possible cycle parking is low maintenance, easy to use and easy and attractive to use by residents.

In accordance with this guidance, the proposed development generates a requirement for a total of 330 no. bicycle parking spaces (260 no. bedrooms + 70 no. visitor spaces).

Provision is made for 330 no. bicycle parking spaces in the subject proposal. 260 no. spaces are provided at undercroft level and 70 no. visitor spaces are provided at ground level.

19.8.13 Car Parking

In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.

59 no. car parking spaces are provided in the subject development. The rationale for parking provision is explained in the *Transportation Assessment Report*.

Bray is already well served by bus and mainline rail high-capacity public transport. In addition, there are planned improvements to public transport in the area with the extension of LUAS from the new terminus in Cherrywood to the Bray Environs (known as LUAS Line B2). This LUAS extension is identified both in Transport Strategy for the Greater Dublin Area 2016-2035.

19.9 Design Manual for Urban Roads and Streets (2013)

The Design Manual for Urban Roads and Streets (DMURS) sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas.

Response: A *Statement of Compliance with DMURS* has been prepared by CHC and is enclosed. The proposed scheme has been designed such that it is compliant with the recommendations of DMURS.

19.10 The Planning System and Flood Risk Management (2009)

Development should preferentially be located in areas with little or no flood hazard thereby avoiding or minimising the risk of flooding.

Planning applications will, where appropriate, need to be accompanied by a detailed flood risk assessment to be considered by planning authorities in determining applications.

The applicant is primarily responsible in the first instance for assessing whether there is a flood risk issue and how it will be addressed in the development they propose.

The flood risk assessment should be incorporated into any EIA process where one is required. The flood risk assessment should be approved/certified by a competent person, qualified and experienced in flood risk assessments.

Response: A *Site Specific Flood Risk Assessment (SSFRA)* has been prepared by CHC and confirms that the site is located in Flood Zone C and residential use on the lands is classified as highly vulnerable. The SSFRA concludes that the proposed development is deemed appropriate on the lands and no justification test is required.

19.11 Guidelines for Planning Authorities on Childcare Facilities (2001)

Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example,

development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.

An average of one childcare facility for each 75 dwellings would be appropriate. The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc

Response: A crèche facility, which can accommodate c.28 no. children, is proposed as part of the subject development. The crèche will be located at ground floor level of Block A.

The number of childcare spaces is calculated based on the number of 2 and 3-bedroom units (106) at a rate of 20 childcare spaces per 75 units.

19.12 Conclusion

This statement demonstrates that the proposed development is fully in compliance with relevant national, regional and local planning policy and Guidelines issued under Section 28.

Appendix 1 – Schedule of Enclosures

The Application is supported by the following plans and particulars:-

- SHD Application Form
- Copy of Site Notice
- Copy of Newspaper Notice
- Letter of Consent from Wicklow County Council
- Part V Booklet
- Planning Fee €25,759.60 (paid by EFT)

Schedule of Reports

Title	Prepared by:
Planning Context Report & Statement of Consistency	Simon Clear & Associates
Statement of Response to An Bord Pleanala Opinion	Simon Clear & Associates
Material Contravention Statement	Simon Clear & Associates
Social Infrastructure Audit	Simon Clear & Associates
Architectural Design Statement	Henry J. Lyons
Landscape Design Statement	Niall Montgomery & Partners
Landscape & Visual Impact Assessment	Arc
Engineering Services Report	Corrigan Hodnett Consulting Engineers
Site Specific Flood Risk Assessment	Corrigan Hodnett Consulting Engineers
DMURS Design Statement	Corrigan Hodnett Consulting Engineers
Outline Construction & Demolition Waste Management Plan	Corrigan Hodnett Consulting Engineers
Outline Construction Management Plan	Corrigan Hodnett Consulting Engineers
Climate Change Impact Assessment	Corrigan Hodnett Consulting Engineers
Environmental Impact Assessment Screening Report	Enviroguide
Statement in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended	Enviroguide
Appropriate Assessment Screening Statement	Enviroguide
Ecological Impact Assessment (including Bat Assessment)	Enviroguide & Dr Tina Aughney
Outline Construction Environmental Management Plan	Enviroguide
Transportation Assessment Report	NRB Consulting Engineers
Daylight & Sunlight Analysis	IN2
Microclimatic Wind Analysis and Pedestrian Comfort	IN2
Archaeological Impact Assessment	Shanarc
Outline Architectural Heritage Impact Assessment	Arc
Operational Waste Management Plan	AWN
Energy Statement	McElligott Consulting Engineers
External Lighting Report	McElligott Consulting Engineers
Outdoor Lighting Report	McElligott Consulting Engineers
Building Lifecycle Report	Aramark
Property Management Strategy Report	Aramark
Fire Regulations Review	Factfire
Disability Access Review	Factfire

Architectural Drawings – Henry J Lyons

DRG. NO.	DRAWING TITLE	SCALE	SIZE
	Site Drawings		
CSB-HJL-AB-XX-DR-A-0001	Site Location Map (OS MAP)	1:1000	A0
CSB-HJL-AB-XX-DR-A-0002	Existing Site Layout Plan	1:500	A0
CSB-HJL-AB-XX-DR-A-0003	Existing / Demolition Site Plan	1:500	A0
CSB-HJL-AB-XX-DR-A-0004	Existing / Demolition Site Elevations	1:200	A0
CSB-HJL-AB-XX-DR-A-0005	Proposed Site Layout Plan	1:500	A0
CSB-HJL-AB-XX-DR-A-0006	Existing / Demolition Plans & Elevations	1:200	A0
	Proposed Drawings		
CSB-HJL-AB-00-DR-A-1010	Proposed Ground Floor Plan Level 00	1:200	A0
CSB-HJL-AB-01-DR-A-1011	Proposed First Floor Plan Level 01	1:200	A0
CSB-HJL-AB-02-DR-A-1012	Proposed Second Floor Plan Level 02	1:200	A0
CSB-HJL-AB-03-DR-A-1013	Proposed Third Floor Plan Level 03	1:200	A0
CSB-HJL-AB-04-DR-A-1014	Proposed Fourth Floor Plan Level 04	1:200	A0
CSB-HJL-AB-05-DR-A-1015	Proposed Fifth Floor Plan Level 05	1:200	A0
CSB-HJL-AB-06-DR-A-1016	Proposed Sixth Floor Plan Level 06	1:200	A0
CSB-HJL-AB-07-DR-A-1017	Proposed Roof Plan Level 07	1:200	A0
CSB-HJL-AB-XX-DR-A-1201	Proposed Unit Types 1 BEDS	1:100	A1
CSB-HJL-AB-XX-DR-A-1202	Proposed Unit Types 2 BEDS	1:100	A1
CSB-HJL-AB-XX-DR-A-1203	Proposed Unit Types 3 BEDS	1:100	A1
CSB-HJL-AB-ZZ-DR-A-2001	Proposed Elevations	1:200	A0
CSB-HJL-AB-ZZ-DR-A-2011	Proposed Contextual Elevations	1:200	A0
CSB-HJL-AB-ZZ-DR-A-2012	Proposed Extended Streetscape Elevation	1:500	A1
CSB-HJL-AB-ZZ-DR-A-3011	Proposed Sections 01	1:200	A0
CSB-HJL-AB-ZZ-DR-A-3012	Proposed Sections 02	1:200	A0

Engineering Drawings – Corrigan Hodnett Consulting Engineers

Document Number	Document Title	Size	Sheets	
CHC-00-GR-DR-C-00015	Site entrance layout for existing road layout.	A1	1	P02
CHC-00-GR-DR-C-00016	Site entrance layout for future BusConnects route	A1	1	P02
CHC-00-GR-DR-C-00017	Proposed road markings, signage & change to marking	A1	1	P01
CHC-00-GR-DR-C-00100	Roads Layout	A1	1	P02
CHC-00-GR-DR-C-00101	Vehicle swept path analysis	A1	1	P04
CHC-00-GR-DR-C-00120	Roads details	A1	1	P01
CHC-00-GR-DR-C-00121	Roads details	A1	1	P01
CHC-00-GR-DR-C-00200	Drainage layout	A1	1	P02
CHC-00-GR-DR-C-00201	Drainage Outfall layout	A1	1	P02
CHC-00-GR-DR-C-00210	Surface and waste water longitudinal sections	A1	1	P02
CHC-00-GR-DR-C-00230	Waste water and surface water local drainage details.	A1	1	P01
CHC-00-GR-DR-C-00240	Surface water drainage details. Sheet 1	A1	1	P01
CHC-00-GR-DR-C-00241	Surface water drainage details. Sheet 2	A1	1	P02
CHC-00-GR-DR-C-00242	Surface water drainage details. Sheet 3	A1	1	P01
CHC-00-GR-DR-C-00250	Waste water drainage details	A1	1	P02
CHC-00-GR-DR-C-00300	Watermain Layout	A1	1	P01
CHC-00-GR-DR-C-00330	Watermain details. Sheet 1	A1	1	P02
CHC-00-GR-DR-C-00331	Watermain details. Sheet 2	A1	1	P02
CHC-00-GR-DR-C-00332	Watermain details. Sheet 3	A1	1	P02
CHC-00-GR-DR-C-00400	Drainage catchment areas layout	A1	1	P02
CHC-00-GR-DR-C-00500	Taking in charge	A1	1	P02

Landscape Drawings – Niall Montgomery & Partners

DRAWING INDEX			
SHEET NUMBER	Sheet Name	SCALE	REVISION
L1-000	COVER PAGE	N/A	
L1-001	DRAWING INDEX	N/A	
L1-003	GENERAL NOTES	N/A	
L1-004	PLANTING SCHEDULE	N/A	
L1-100	OPEN SPACE PLAN	1:250	
L1-101	EXISTING BOUNDARY LAYOUT	1:250	
L1-102	PROPOSED BOUNDARY LAYOUT	1:250	
L1-103	GENERAL ARRANGEMENT PLAN GROUND LEVEL	1:250	
L1-104	GENERAL ARRANGEMENT PLAN FIRST LEVEL	1:250	
L1-800	SECTION LOCATION PLAN	1:250	
L1-801	SECTIONS 1 OF 5	1:50	
L1-802	SECTIONS 2 OF 5	1:50	
L1-803	SECTIONS 3 OF 5	1:50	
L1-804	SECTIONS 4 OF 5	1:50	
L1-805	SECTIONS 5 OF 5	1:50	
L1-900	DETAILS - PAVING	AS SHOWN	
L1-901	DETAILS - SITE FURNITURE 1/2	AS SHOWN	
L1-902	DETAILS - SITE FURNITURE 2/2	AS SHOWN	
L1-903	DETAILS - PRIVATE AMENITY SPACES	AS SHOWN	
L1-904	DETAILS - PLAY EQUIPMENT 1/2	AS SHOWN	
L1-905	DETAILS - PLAY EQUIPMENT 2/2	AS SHOWN	
L1-906	DETAILS - OUTDOOR EXERCISE EQUIPMENT	AS SHOWN	
L1-907	DETAILS - PLANTING DETAILS 1/2	AS SHOWN	
L1-908	DETAILS - PLANTING DETAILS 2/2	AS SHOWN	

Lighting Drawing – McElligott Consulting Engineers

Drg. No.	Drawing Title	Scale	Size
20051-E040	Ground Floor Plan External Lighting	1:200	A1
20051-E041	Podium Plan External Lighting	1:200	A1

Appendix 2 – Planning History

Reg. Ref. 14/2174 (ABP Ref. PL 27.245361)

Permission sought by Aldi Stores Ireland Limited for:- Demolition of existing buildings and outbuildings (totalling 1970sqm gross) and associated site development works, the construction of a single storey double height discount food store (with ancillary off licence sales) measuring 1635sqm gross floor space.

Permission refused by An Bord Pleanála on 21 December 2015 for the following reason:-
Having regard to the objective of the Bray Town Development Plan 2011 – 2017 to “promote the re-development and intensification of use” of opportunity sites, and to the specific identification of the subject site as Opportunity Site Number 3 under Section 4.4.13 of this Plan, (wherein it is indicated that “mixed-use development comprising commercial units on ground floor and office/residential units on upper floors” would be acceptable), it is considered that the proposed development, which provides for a single retail unit at ground floor level only, would not promote the appropriate redevelopment and intensification of use of this opportunity site and would result in this opportunity site, which is located in the core retail area of Bray, becoming under-utilised.

Furthermore, by reason of its monolithic and standardised form, and its generally single storied nature, and notwithstanding the modifications to the original design, as submitted to the planning authority on the 23rd day of April, 2015, it is considered that the proposed development does not demonstrate a sufficiently high quality of urban design nor provide an innovative architectural design solution for this opportunity site within the core retail area of Bray. The proposed development would, therefore, materially contravene the objective of the Bray Town Development Plan 2011 – 2017 to promote the re-development and intensification of use of this opportunity site, and would be contrary to the proper planning and sustainable development of the area.

Reg. Ref. 06/630256

Permission sought by Heiton Buckley Limited for:- Erection of a 600mm additional course plus supporting piers to the top of the existing boundary wall and fence adjoining St. Anthony’s, Dwyer Park.

Permission granted on 30 November 2006.

Reg. Ref. 03/630112

Permission sought by Thomas & Elaine O'Reilly for:- Installation of dormer windows to south facing roof to convert existing attic area to living accommodation and construction of porch and canopy to south facing wall at existing front door at St. Anthony's, Dwyer Park.

Permission granted on 19 August 2003.

Reg. Ref. 01/630142

Permission sought by F&T Buckley Holdings Limited for:- Erection of a fence 1.2m above existing fence and wall adjacent to St. Anthony's, Dwyer Park.

Permission granted 6 November 2001.