



PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT 'SEA GARDENS PHASE 1 BLOCK A'

Planning Report and Statement of Consistency with Planning Policy

IE002560
F01
31 July 2025

Planning Report and Statement of Consistency with Planning Policy

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
D01	Planning	TH/CM	CM	HG	02.07.2025

Approval for issue

31 July 2025

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

Prepared for:

Shankill Property Investments Ltd

Dublin | Cork | Galway | Sligo | Kilkenny
 rpsgroup.com

RPS Group Limited, registered in Ireland No. 91911
 RPS Consulting Engineers Limited, registered in Ireland No. 161581
 RPS Engineering Services Limited, registered in Ireland No. 99795
 The Registered office of each of the above companies is West Pier Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7



Contents

1	INTRODUCTION	1
1.1	Nature of Application	1
1.2	Prospective LRD Applicant	1
1.3	Proposed Development Overview	1
1.4	Legislative Context & Requirements	2
1.5	Purpose of this Report	3
2	SITE CONTEXT, LOCATION AND DESCRIPTION	4
2.1	Site Context	4
2.2	Site Location	6
2.3	Site Description	7
3	PLANNING HISTORY	8
3.1	Subject Lands	8
3.1.1	Strategic Housing Development Application: ABP-311181-21	8
3.1.2	Strategic Housing Development Application: ABP - 314686-22	10
3.2	Adjoining Lands	14
3.2.1	Wicklow County Council Reg. Ref. 2560207	14
3.3	Conclusion	16
4	DESCRIPTION OF THE PROPOSED DEVELOPMENT	17
4.1	Sea Gardens Masterplan	17
4.2	Proposed Development	17
4.2.1	Site Layout / Overview of Development	17
4.2.2	Block A1	19
4.2.3	Block A2	19
4.2.4	Townhouses	19
4.2.5	Residential Density	19
4.2.6	Residential Mix	20
4.2.7	Building Height	20
4.2.8	Materials and Finishes	21
4.3	Open Space and Landscaping	21
4.3.1	Public Open Space	21
4.3.2	Communal Open Space	24
4.3.3	Private Open Space	26
4.4	Access and Connectivity	26
4.5	Parking	26
4.5.1	Car Parking	26
4.5.2	Motorcycle Parking	26
4.5.3	Bicycle Parking	27
4.6	Site Services	27
4.6.1	Lighting	27
4.6.2	Refuse	27
4.6.3	ESB Substation	27
4.7	Water Supply and Drainage	27
4.7.1	Surface Water Drainage	27
4.7.2	Foul Sewer Drainage	28
4.7.3	Water Supply	28
4.7.4	Flood Risk Assessment	28
4.8	Taking in Charge	28
4.9	Social and Affordable Housing (Part V)	28
4.10	Childcare Facility	29
5	ASSESSMENT OF KEY PLANNING ISSUES	30

Planning Report and Statement of Consistency with Planning Policy

5.1	Introduction.....	30
5.2	Principle of Development	30
5.3	Density	31
5.4	Building Height, Scale, Massing and Design	33
5.5	Visual Impact.....	38
5.6	Daylight, Sunlight and Overshadowing	39
5.7	Access, Connectivity and Traffic	40
5.8	Car Parking	41
5.9	Bicycle Parking.....	42
5.10	Open Space	43
	5.10.1 Public Open Space	43
	5.10.2 Communal Open Space	44
	5.10.3 Private Open Space.....	44
5.11	Childcare Facility.....	45
6	ENVIRONMENTAL APPRAISALS.....	46
6.1	Environmental Impact Assessment Screening	46
6.2	Appropriate Assessment Screening.....	46
7	STATEMENT OF CONSISTENCY WITH PLANNING POLICY.....	47
7.1	Introduction.....	47
7.2	National Level.....	47
	7.2.1 Project Ireland 2040: National Planning Framework (Revised 2025).....	47
	7.2.2 Housing for All – A New Housing Plan for Ireland, 2021	50
	7.2.3 Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)	51
	7.2.4 Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025).....	56
	7.2.5 Urban Development and Building Heights – Guidelines for Planning Authorities (2018).....	61
	7.2.6 Childcare Facilities - Guidelines for Planning Authorities (2001)	61
	7.2.7 Design Manual for Urban Roads and Streets (2013)	62
	7.2.8 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)	62
7.3	Regional Level.....	63
	7.3.1 Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031	63
	7.3.2 Greater Dublin Area Transport Strategy 2022–2042.....	67
	7.3.3 2022 Greater Dublin Area Cycle Network	68
7.4	County & Local Level	69
	7.4.1 Dún Laoghaire-Rathdown County Council Development Plan 2022 – 2028	69
	7.4.2 Bray and Environs Transport Study (2019)	91
8	CONCLUSION	94

Tables

Table 4-1: Summary Schedule of Accommodation	20
Table 5-1: DLRCDP Communal Open Space Requirements.....	44
Table 5-2: DLRCDP Private Open Space Requirements.....	45
Table 7-1: NPF Consistency Appraisal.....	48
Table 7-2: Housing for All - Consistency Appraisal	50
Table 7-3: Design Standards for Apartments Consistency Appraisal	56
Table 7-4: RSES Consistency Appraisal	64

Planning Report and Statement of Consistency with Planning Policy

Table 7-5: GDA Transport Strategy	67
Table 7-6: DLRCDP Consistency Appraisal	71
Table 7-7: Building Height Strategy – Criteria for Assessing Proposals for Increased Height.....	84
Table 7-8: Block A compliance with Bray and Environs Transport Study 2019	92

Figures

Figure 2-1: Indicative Site Location (outlined in red)	4
Figure 2-2: Context within Sea Gardens Masterplan (subject site outlined in red)	5
Figure 2-3: Aerial view of the overall Sea Gardens development (prior to the construction of Phase 1)	6
Figure 3-1: Proposed Site Layout Plan under ABP-311181-21	8
Figure 3-2: Eastern Elevation	9
Figure 3-3: Proposed Site Layout Plan under ABP-314686-22	11
Figure 3-4: Block A, West Elevation	12
Figure 3-5: Block A, North Elevation	12
Figure 3-6: Block B, West Elevation	12
Figure 3-7: Block B, South Elevation.....	13
Figure 3-8: Sea Gardens Phase 2 as proposed under WCC Reg. Ref. 2560207	15
Figure 3-9: Phase 2 Block E as proposed under WCC Reg. Ref. 2560207 in the context of ABP-314686-22	15
Figure 4-1: Proposed Site Layout Plan.....	17
Figure 4-2: Proposed Massing and Building Heights	18
Figure 4-3: Proposed Townhouse (western townhouse on left side)	19
Figure 4-4: Section of Block A proposal and Shoreside Park to the west.....	21
Figure 4-5: Proposed Public Open Space	22
Figure 4-6: Proposed Access & Linkages	23
Figure 4-7: Proposed Boundary Treatments	24
Figure 4-8: Proposed Communal Courtyard Space	25
Figure 4-9: Proposed Part V Provision	29
Figure 5-1: Land Use Zoning Objectives (site location in outlined red).....	31
Figure 5-2: Walking distances to public transport, local services and amenities	34
Figure 5-3: Locating taller buildings towards the coast	35
Figure 5-4: Building Heights Plan	36
Figure 5-5: Conceptual revised approach to coastal corridor.....	37
Figure 5-6: East-west permeability and utilisation of coastal setting.....	37
Figure 5-7: DLRCDP Car Parking Standards	41
Figure 7-1: Bray and the Eastern and Midland Region	64
Figure 7-2: Proposed Cycle Network Within and Proximate to Subject Site.....	69
Figure 7-3: Land Use Zoning Objectives (site location outlined in red).....	70
Figure 7-4: Preferred Approach 2035.....	92

1 INTRODUCTION

1.1 Nature of Application

RPS, West Pier Business Campus, Dun Laoghaire, County Dublin, in association with a multidisciplinary team, has been instructed to prepare this *Planning Report and Statement of Consistency with Planning Policy* to accompany an application to Dún Laoghaire-Rathdown County Council (DLRCC) in relation to a proposed Large-scale Residential Development (LRD) at lands off the Dublin Road within the former Bray Golf Course lands, Bray, County Dublin, on behalf of the prospective LRD applicant Shankill Property Investments Ltd, One Royal Canal Ave, Royal Canal Park, Ashtown, Dublin, D15 DKW4.

This request is made following a section 247 meeting (Ref no. PAC/LRD1/032/24) and a section 32B pre-application consultation (Ref no. PAC/LRD2/003/25) with DLRCC in accordance with the provisions of the *Planning and Development Act 2000*, as amended (the Planning Act) and article 16A of the *Planning and Development Regulations 2001-2025* (Planning Regulations).

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

- Planning Consultant: RPS
- Project Architect: Howells Architects (Howells)
- Consultant Civil, Structural & Traffic Engineer: AtkinsRéalis (Atkins)
- M&E Engineer: Metec Consulting Engineers (Metec)
- Landscape Architect: Bernard Seymour Landscape Architects (BSLA)
- Visualisation Consultant: 3D Design Bureau (3DDB)
- Visual Impact Assessment Consultant: Model Works
- Cultural Heritage Consultant: John Cronin & Associates (JCA)
- Microclimate Consultant: B-Fluid Ltd. (B-Fluid)
- Noise Impact Consultant: AWN Consulting Ltd. (AWN)
- Property Management Consultant: Aramark Property (Aramark).

1.2 Prospective LRD Applicant

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

1.3 Proposed Development Overview

The proposed development comprises of a residential development on a site at the former Bray Golf Club Lands off the Dublin Road, Bray, County Dublin. The development will complete Phase 1 of the wider Sea Gardens development – the first part of which (Shoreside Park as permitted under ABP-311181-21) is nearing completion and occupation. The site context in relation to the wider Sea Gardens development is set out in **Section 2.1** of this Planning Report.

The c. 1.38 hectare site is generally bounded to the north by existing public open space at Corke Abbey Valley Park, to the east by the Irish Rail Dublin-Wexford/Rosslare main rail line, to the south by undeveloped lands and to the west by Shoreside Park.

In summary, the proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of 9 no. terraced townhouses and 150 no. apartments. The apartments

Planning Report & Statement of Consistency with Planning Policy

will be contained within 2 no. blocks ranging from 6 to 11-storeys (including the shared 2-level podium). The blocks will also include communal lounge areas, a communal gym, cinema room, refuse storage areas and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking.

The proposed development will also include public open space, communal open space, pedestrian / cycle linkages with adjoining existing and permitted developments, associated connections to the surrounding road network, all associated landscaping and public lighting, an ESB substation, drainage arrangements, utility connections and all site development works.

The subject proposals have been designed for private sale and individual homeowners, with larger than normal apartment sizes and high-quality amenities and public open space.

A full description of the proposed development is set out in **Section 4** of this Planning Report. A suite of supporting documentation is enclosed as part of this LRD application.

1.4 Legislative Context & Requirements

The proposal meets the requirements of section 32A of the Planning Act as follows:

- The proposed development is located on land that is zoned 'Objective A' in the Dun Laoghaire - Rathdown Development Plan 2022-2028 (the DLRCDP), the zoning of which seeks "*To provide residential development and improve residential amenity while protecting the existing residential amenities*".
- Following initial consultations under section 247 of the Planning Act, an LRD Meeting (Ref no. PAC/LRD2/003/25) was held between the Applicant, representatives of its design team and DLRCC on 14th April 2025.
- An LRD Opinion was received on 7th May 2025 in accordance with section 32D of the Planning Act. A copy of the LRD Opinion is appended to the *Statement of Specific Information Requirements of the LRD Opinion* prepared by RPS submitted with this application.
- This proposal falls under the definition of LRD, as set out under section 2 of the Planning Act, as it includes 159 no. residential units exceeding the LRD threshold of 100 or more houses, and the cumulative gross floor space of the residential accommodation comprises not less than 70% of the LRD floorspace of the buildings comprising the development of the total application floorspace.

In accordance with articles 22, 22A and 23 of the Planning Regulations, the application for a proposed LRD is accompanied by the following:

- A completed application form.
- The appropriate fee.
- The relevant page of the newspaper, or a copy of the relevant page, in which notice of the application has been published and a copy of the site notice erected on the land.
- A location map (Drawing No. BRA-HWS-BA-ZZ-D-A-10100) marked so as to identify clearly (i) in red, the land or structure to which the application relates and the boundaries thereof, (ii) in blue, any land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application, (iii) in yellow, any wayleaves, and (iv) the position of the site notice or notices erected on the land.
- Site plans, elevations and floor plans screened with respect to the requirements of articles 22 and 23 of the Planning Regulations.
- A statement setting out how the proposal will be consistent with the DLRCDP (**Section 7** of this *Planning Report and Statement of Consistency*).
- The LRD Opinion states that the Planning Authority is of the opinion that the documentation submitted as part of the LRD consultation process constitutes a reasonable basis on which to make an application for the proposed LRD. In this regard, a statement of response, as provided for under section 32D of the Planning Act, is not required in this instance. Pursuant to article 16A(7) the LRD Opinion lists specific information to be submitted with the application for permission in addition to the requirements as specified in articles 20A, 22 and 23. This information is set out in the *Statement of Specific Information Requirements of the LRD Opinion* prepared by RPS and enclosed with the application package.

Planning Report & Statement of Consistency with Planning Policy

- An *Architectural Design Statement* that addresses the site's location and context and the proposed design strategy prepared by Howells.
- A *Schedule of Accommodation* is provided in the *Housing Quality Assessment* prepared by Howells.
- A *Confirmation of Feasibility Statement* from Uisce Éireann (UÉ) in relation to the proposed development confirming that there is or will be sufficient water network treatment capacity to the service the development is appended to the *Engineering Report* prepared by Atkins accompanying this application.
- A *Traffic Impact Assessment* prepared by Atkins having regard to the DLRCDP and *Traffic and Transport Assessment Guidelines* (TII) is enclosed with the application.
- Details of compliance with Part V of the Planning Act.
- Supporting documentation and drawings enclosed with this application are set out in the *Schedule of Enclosures*.

This application has been submitted via DLRC's online portal.

1.5 Purpose of this Report

This Planning Report is arranged under the following headings:

- **Section 1:** Introduction – provides the context within which the proposed development seeks consent.
- **Section 2:** Site Context, Location & Description – provides details of the site upon which the proposed development will be located and the surrounding context.
- **Section 3:** Planning History – provides an overview of the planning history of the subject site and relevant planning precedent.
- **Section 4:** Description of the Proposed Development – provides a description of the proposed development and refers to where further details are provided in the request.
- **Section 5:** Assessment of Key Planning Issues - sets out how the proposed development has had regard for key matters raised during pre-application consultations with the planning authority, and having regard for issues raised in relation to previous planning applications at the subject site.
- **Section 6:** Environmental Appraisals – reviews the environmental assessments undertaken as part of the application and summarises their findings.
- **Section 7:** Statement of Consistency with Planning Policy – demonstrates the proposed development's compliance with relevant planning policy.
- **Section 8:** Conclusion.

2 SITE CONTEXT, LOCATION AND DESCRIPTION

2.1 Site Context

The c. 1.38 hectare subject site is located within the former Bray Golf Club lands north of the Dargle River and Bray town centre (see **Figure 2-1**).

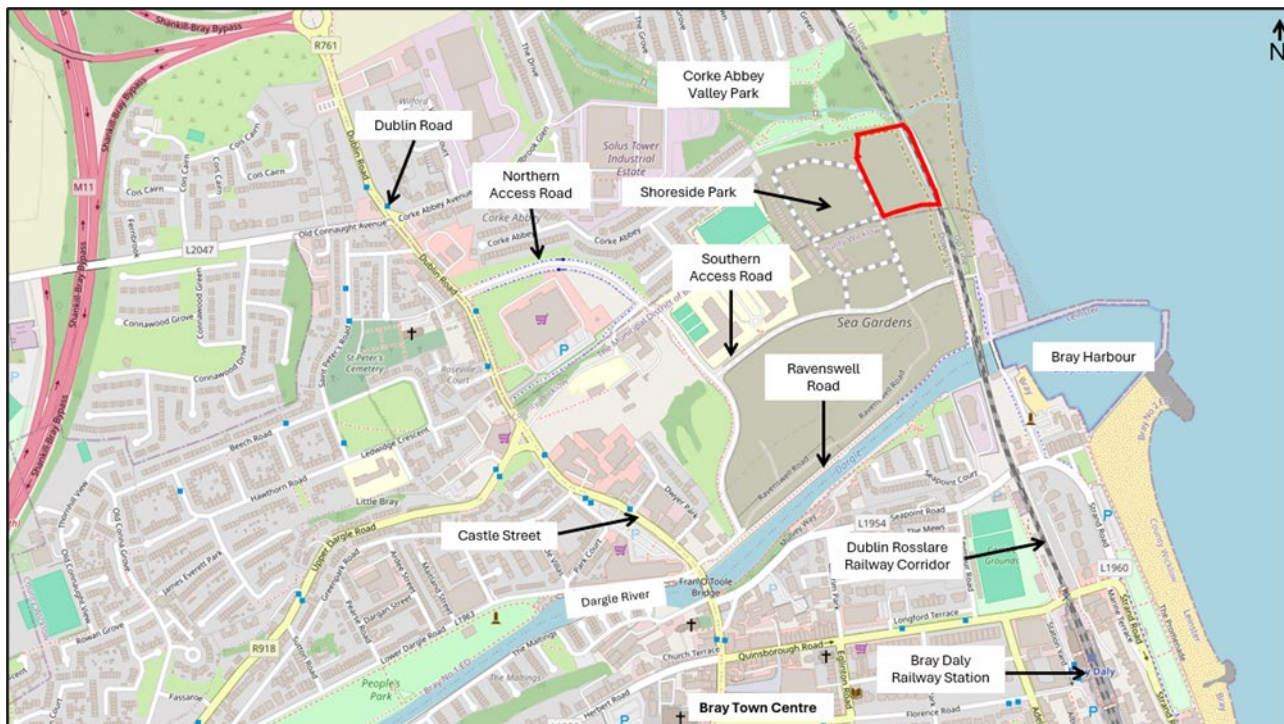


Figure 2-1: Indicative Site Location (outlined in red)

Source: Open Street Maps with RPS annotation

The site forms part of a larger landholding within the Applicant's ownership that is currently being developed as Sea Gardens (formerly Coastal Quarter and River Quarter). This 18 hectare wider landholding is located to the west of the Dublin to Rosslare railway corridor and Bray Harbour, south of Corke Abbey Valley Park, north of the Dargle River and Bray town centre, and east of the Ravenswell schools campus.

Given the size and strategic location of the wider landholding, the Applicant appointed Howells to prepare a masterplan to guide the development of this area. The *Sea Gardens Masterplan* (formerly *Harbour Point Masterplan*) is grounded in national, regional and local planning policy and guidelines, as well as best practice in urban design. It provides the overarching development framework for the wider landholding and sets out the design principles that has governed previous planning applications, and all future applications in the area. The masterplan is enclosed as part of this LRD planning application. **Figure 2-2** illustrates the location of the subject site within the context of the *Sea Gardens Masterplan*.

Planning Report & Statement of Consistency with Planning Policy

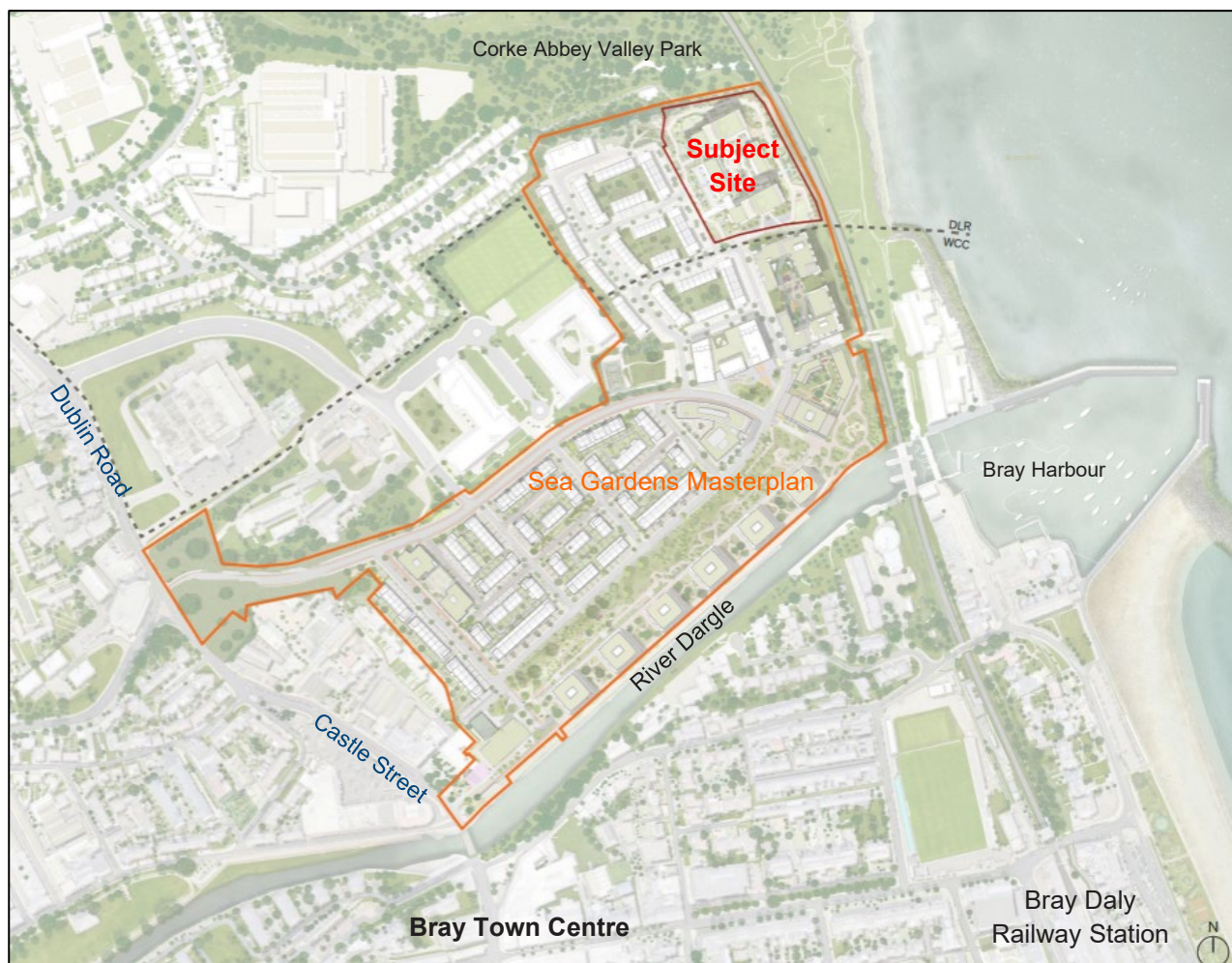


Figure 2-2: Context within Sea Gardens Masterplan (subject site outlined in red)

Source: Architectural Design Statement (Howells) with RPS annotation

Within the Dublin Metropolitan Area, there is an urgent demand for an increased provision of housing. Given the scale of the landholding and the urgency of the current housing crisis, the Applicant has advanced the development of the northwestern portion of Sea Gardens (Phase 1 as permitted under ABP-311181-21). This development is now nearing completion and is known as Shoreside Park. **Figure 2-3** provides an aerial view from the north of the overall Sea Gardens development (prior to the construction of Shoreside Park).

Planning Report & Statement of Consistency with Planning Policy



Figure 2-3: Aerial view of the overall Sea Gardens development (prior to the construction of Phase 1)

Source: *Architectural Design Statement (Howells)*

As detailed in **Section 3** of this Planning Report, the Applicant obtained planning permission for the development of Blocks A and B in the northeastern portion of the wider landholding (under ABP-314686-22). This permitted development included the provision of Built-To-Rent apartment units which, due to changes in market demand, the Applicant no longer intends to construct. In this regard, the subject proposals seek to provide a revised mix of apartment sizes within Block A and an updated design that will deliver family-sized homes that comply with all DLRCDP requirements and relevant development management guidelines. The newly proposed design for Block A will integrate seamlessly into the wider permitted scheme and will complete the northern section of the overall masterplan area within the administrative area of DLRCC.

It is further noted that a planning application for development along the Dargle River (Phase 2 - River Quarter) has recently been lodged with Wicklow County Council (WCC) under Ref. 2560207. WCC issued a Request for Further Information on 14th May 2025 and a response is currently being prepared by the Applicant and design team.

2.2 Site Location

The subject site is located within the northeast portion of the overall Sea Gardens site and is bounded:

- To the north by Corke Abbey Valley Park through which Rathmichael Stream flows in an easterly direction through wooded and grassland areas which have formalised public pathways throughout. There is a belt of woodland planting along the northern boundary which provides a strong landscape backdrop.
- To the east by the Dublin to Rosslare railway line which runs along the eastern boundary of the subject site, with a coastal strip and the Irish sea located beyond this.
- To the south by the administrative boundary between DLRCC and WCC, with undeveloped lands located beyond this (future location of Sea Gardens - Block B).
- To the west, by Shoreside Park which was permitted under ABP-311181-21. This development is under construction and nearing completion, with several units already occupied. Coláiste Ráithín and Ravenswell Primary School are located further to the west of this new development.

Planning Report & Statement of Consistency with Planning Policy

The site is accessed from the Dublin Road (R761 Regional Road) via the Northern Access Road which forms the eastern and northern boundaries of Lidl (former Industrial Yarns site), and the Southern Access Road which facilitates access from Castle Street via the Ravenswell Road. These main access roads lead to a network of new internal streets permitted under ABP-311181-21 (Shoreside Park – formerly referred to as Coastal Quarter SHD) (see **Section 3** of this Planning Report).

The site is well-served by existing high-capacity public transport services including the DART, Commuter Rail and Intercity Rail services with Bray Daly Railway Station located c. 800m from the edge of the application site. It is also served by the Dublin-Bray Bus Corridor with several stops located along the Dublin Road. The proposed development will also benefit from future public transport in the area with plans to upgrade train services through the DART+ Coastal South project and to extend the LUAS Green Line to Bray. Details relating to the wider transport context, existing road network and public transport connections are set out in the *Traffic Impact Assessment* prepared by Atkins.

2.3 Site Description

The subject infill site contains remnants of its former use as a golf course and is primarily covered in grass and mixed vegetation. There is an existing pedestrian link to Corke Abbey Valley Park at the northern boundary of the site which was provided as part of the permitted development under ABP-311181-21 (Shoreside Park) and agreed through compliance with relevant conditions on the grant of permission.

The site topography is generally flat with the only exceptions being a small decrease in elevation toward the southern end of the site and a small ridge rising toward the eastern boundary.

The lands include an archaeological site comprising of a linear earthwork which runs along the county boundary line. This feature presents itself along a low bank and is recorded as a “*possible linear earthwork*” in the County Dublin edition of the Record of Monuments and Places (RMP no. 026-124). A number of archaeological investigations of this earthwork have been undertaken as part of previous planning applications in the area¹. These investigations concluded that the earthwork comprises of an 18th / 19th century landscape feature and is not a section of the ‘Pale’ ditch as had been previously postulated by Archaeological Survey of Ireland.

Further details with respect to the location and characteristics of the site and the surrounding area are set out in the *Architectural Design Statement* prepared by Howells and enclosed as part of this LRD application.

¹ These investigations are detailed in the *Archaeological and Built Heritage Assessment* prepared by John Cronin and Associates and are also reported in the *Environmental Impact Assessment Report* (EIAR) submitted as part of the planning application under ABP-311181-21. An updated *Cultural Heritage Assessment* will be prepared and submitted as part of the subject LRD planning application.

3 PLANNING HISTORY

A desktop review of the planning history for the subject lands and its immediate surroundings was undertaken using the DLRCC and WCC online planning search facilities in May 2025. A summary of the relevant planning history is set out herein. Any concerns or issues identified pertinent to the subject application have been considered in the design process and are addressed in so far as is possible.

3.1 Subject Lands

Within the former Bray Golf Course lands, permission was previously granted for residential development under 2 no. separate Strategic Housing Development (SHD) applications ABP-311181-21 and ABP-314686-22. The details of each are set out below.

3.1.1 Strategic Housing Development Application: ABP-311181-21²

On 20th August 2021, Shankill Property Investments Ltd applied for permission for a SHD comprising 591 no. residential units in a mix of apartments, duplexes and houses. The development proposed 278 no. residential units within the administrative area of DLRCC, and 313 no. residential units within the administrative area of WCC. The development also included, *inter alia*, a childcare facility, café, commercial units, an internal road network, public and private open spaces and associated car and bicycle parking. **Figure 3-1** illustrates the proposed site layout.



Figure 3-1: Proposed Site Layout Plan under ABP-311181-21

Source: Reddy Architecture and Urbanism – extract from ABP-311181-21 application drawings

² Application available: [311181 | An Bord Pleanála](#)

Planning Report & Statement of Consistency with Planning Policy

The SHD included apartment blocks along the eastern boundary of the site, comprising of:

- **Block A**, consisting of 4 to 8-storeys including a shared ground level floor plate and enclosing communal podium level courtyard. Block A was located within the administrative area of DLRCC (representing the site which is the subject of this Planning Report); and
- **Block B**, consisting of 4 to 8-storeys in a similar arrangement to Block A. Block B was located further to the south, within the administrative boundary of WCC.

Both of these blocks included apartments, residential services, associated plant, storage and parking at within the shared 2-level podium, with the upper floors arranged around a podium-level communal courtyard. The taller elements of these buildings were proposed to be located along the coastal boundary, as illustrated in **Figure 3-2**.



Figure 3-2: Eastern Elevation

Source: Reddy Architecture and Urbanism – extract from ABP-311181-21 application drawings

3.1.1.1 DLRCC's Chief Executive's Report

DLRCC's Chief Executive's Report (the CE's Report) considered that many elements of the proposed development were acceptable and in accordance with the provisions of the Development Plan and Apartment Guidelines, including the proposed density, residential accommodation and residential mix.

However, the CE's Report ultimately recommended that permission be refused, stating that:

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

In this regard, the CE's Report noted that Block A would present a continuous facade in excess of 40m and suggested that the uniform layout and pattern of balcony elements and fenestration would have a negative cumulative visual impact with Block B which was of similar design. The CE's Report also suggested that the predominance of render and proposed mix of materials would not successfully break up the overall massing and form of the apartment blocks, and the development would not contribute to the neighbourhood or streetscape relative to the coastline.

The CE's Report also noted that the proposed distance of 16m between opposing balcony elements of Blocks A and B would not meet the minimum requirement of 22m between opposing windows and recommended that, having regard for these concerns, permission should be refused for the development.

3.1.1.2 WCC's Chief Executive's Report

WCC's CE's Report recommended granting permission, finding the principle of development, density, height and unit mix acceptable. The location and overall design of the proposed apartments were also deemed to be acceptable, subject to the inclusion of brick finishes to enhance visual amenity and durability.

Planning Report & Statement of Consistency with Planning Policy

3.1.1.3 ABP Inspector's Report

ABP's Inspector considered the principle of the proposed residential and commercial uses to be acceptable and noted that the site could accommodate higher densities and taller buildings³. However, the Inspector raised concerns in relation to the proposed design, massing, finishes and potential visual impact of Blocks A and B. In this regard, the Inspector's Report stated that:

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

Having regard for the above, the Inspector's Report recommended a split decision, refusing permission for Blocks A and B while granting permission for the remainder of the proposed development, subject to conditions.

3.1.1.4 ABP's Decision

On 9th December 2021, the Board issued an Order aligning with the Inspector's recommended split decision, stating the following reason for refusing permission for Blocks A and B (RPS's emphasis in bold):

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

It is noted that the permitted elements of the development (i.e. the western portion of the site) are currently under construction and nearing completion, with several units now occupied.

3.1.2 Strategic Housing Development Application: ABP - 314686-22⁴

On 23rd September 2022, Shankill Property Investments Ltd applied for permission for a revised SHD on the same site as the previous application (ABP-311181-21 - see **Section 3.1.1**). The revised SHD included permitted elements from the previous SHD application, with minor modifications as required by various conditions, and new designs for Blocks A and B, which were previously refused as part of the split decision.

The revised SHD proposed the provision of a total of 586 no. residential units, with 274 no. units located within the administrative area of DL RCC and 312 no. units and ancillary uses (childcare facility, café, retail and commercial units etc.) within the administrative area of WCC. **Figure 3-3** illustrates the proposed site layout plan.

³ The application under ABP-311181-21 was evaluated in the context of the *Dun Laoghaire-Rathdown County Development Plan 2016-2022*

⁴ Application available: [314686 | An Bord Pleanála](#)



Figure 3-3: Proposed Site Layout Plan under ABP-314686-22

Source: Howells – extract from ABP-314686-22 application drawings

The revised proposals for Block A included 162 no. Build-to-Rent apartments in 2 no. c-shaped blocks (Block A1 and Block A2) centred around a courtyard at podium level, above a shared ground floor plate. The proposed blocks ranged in height from 4 to 7 storeys (including the shared ground floor level) (see **Figure 3-4** and **Figure 3-5**).

The Block A apartments consisted of 79 no. 1-bedroom apartments, 76 no. 2-bedroom apartments, and 7 no. 3-bedroom apartments, all with balconies or terraces. Additionally, Block A would include c. 545sq. m of residential amenity and service space, accommodating a residents' gym, co-working space, resident lounges and a concierge area. It also provided undercroft car and bicycle parking spaces along with bicycle repair areas, ancillary plant, waste storage and substations/switch rooms.

The design of Block A was significantly revised from the previous proposal that was refused by ABP at the subject site under ABP-311181-21, addressing concerns related to massing, architectural expression, and façade treatment.

Planning Report & Statement of Consistency with Planning Policy



Figure 3-4: Block A, West Elevation

Source: Howells – extract from ABP-314686-22 application drawings



Figure 3-5: Block A, North Elevation

Source: Howells – extract from ABP-314686-22 application drawings

Block B (comprising Blocks B1 and B2) followed a similar c-shaped configuration to Block A, proposing 190 no. apartments, comprising of 94 no. 1-bedroom apartments, 86 no. 2-bedroom apartments, and 10 no. 3-bedroom apartments. It also included c. 539sq. m of residential amenity space and a c. 114sq. m commercial unit incorporating a gym/juice bar. Block B provided heights ranging from 5 to 12 storeys (including the shared ground floor plate), with the 12-storey element located in the southeastern portion of the site (see Figure 3-6 and Figure 3-7).



Figure 3-6: Block B, West Elevation

Source: Howells – extract from ABP-314686-22 application drawings

Planning Report & Statement of Consistency with Planning Policy



Figure 3-7: Block B, South Elevation

Source: Howells – extract from ABP-314686-22 application drawings

3.1.2.1 DLRCC’s Chief Executive’s Report

DLRCC’s CE’s Report noted that the proposed development met the performance-based criteria for taller buildings as set out in the DLRCC’s Building Height Strategy and highlighted that the revised design effectively responded to the coastal environment and positively contributed to the urban neighbourhood. The CE’s Report stated that:

“The Planning Authority is satisfied that the subject site is capable of accommodating increased height which would accord with the proper planning and sustainable development of the area and comply with the applicable performance based criteria set out in Table 5.1 of the Building Height Strategy comprising Appendix 5 of the Dun Laoghaire Rathdown County Development Plan 2022-2028.

The massing of Block A, comprising the constituent buildings of A1 and A2 (with minimum setback between same in excess of 20m), with central communal open space area at podium level of same, treatment of balcony and fenestration detailing on external elevations of Block A overall, and contrasting but complementary brick finish to buildings A1 and A2, represents a considerable modification from the form previously proposed and refused by An Bord Pleanála at the subject site under ABP-311181-21, in terms of overall massing, architectural expression and design, external finishes, and facade treatment. It is the opinion of the Planning Authority that Block A, as proposed, represents an acceptable design response to the receiving coastal environment and is acceptable at this location” (RPS emphasis in bold).

The CE’s Report concluded that the design of Block A had been significantly revised from the previously refused proposal (under ABP-311181-21) and addressed previous concerns related to massing, architectural expression and façade treatment. In this regard, the CE’s Report recommended that permission be granted for the proposed development.

3.1.2.2 ABP’s Inspector’s Report

ABP’s Inspector acknowledged that the proposed development would have a larger scale compared to the existing built environment but noted that this increase in scale was not inherently problematic, particularly in the context of the overall site layout. The Inspector’s Report considered Block A to be appropriately designed and positioned to minimise impacts on neighbouring properties. However, it suggested that Block B featured an excessive overall height and should be reduced through the removal of 3 no. floors.

In this regard, the Inspector’s Report concluded the following (RPS emphasis in bold):

“Having regard to the foregoing, I am satisfied that with the exception of the excessive height of Block B, the proposed development would be of a scale, height, design and layout, and would not have any unacceptable impacts on the visual amenity or character of the area. The upper-floor element of Block B is a relatively minor aspect of the overall

Planning Report & Statement of Consistency with Planning Policy

development, and my concerns would be satisfactorily addressed by the removal of three floors (floors 7-9). This would reduce this element to a maximum of 9 storeys, while still maintaining a suitable variation in building height and a landmark focus at this prominent position. I do not consider that this would adversely impact on the overall integrity of the design approach. [...]

The proposal includes a wide range of building typologies. And while I acknowledge that **some blocks are of significant scale, particularly Blocks A & B**, I consider that the **design approach avoids a monolithic appearance** through a variety of heights, finishes, and elevational detailing. Blocks A & B will present as 4 separate blocks which will be suitably separated and distinguished by a variety of heights, finishes, and façade treatment. I am satisfied that the excessive height of Block B could be reduced while still maintaining an appropriate variety of height and massing. [...]

Subject to this suggested amendment, **I consider that the proposed development would be consistent with local policy as outlined in the DLRCDP, the WCDP, and the Bray LAP. It would also be consistent with regional and national policy/guidance, including the Building Height Guidelines, to support increased height and density subject to compliance with the criteria as outlined in this section. Notwithstanding its comparative scale and height, the amended proposal would satisfactorily integrate with its environment and would not detract from the character or amenities of the area in any unacceptable way. Accordingly, I have no objections in relation to design, layout, and the landscape/visual impacts of the proposed development subject to the suggested amendment”.**

The Inspector’s Report recommended that permission be granted for the proposed development, subject a reduction in height of Block B by 3 no. floors (floors 7, 8 and 9), reducing the overall height of this element to 9-storeys.

3.1.2.3 ABP Decision

Aligning with the Inspector’s recommendation, the Board issued an Order to grant permission for the SHD on 1st July 2024, subject to 34 no. conditions, stating the following reason for this decision (RPS emphasis in bold):

*“The Board considered that, subject to compliance with the conditions set out below, the proposed development would be in accordance with the provisions of the Dun Laoghaire Rathdown County Development Plan 2022-2028, the Wicklow County Development Plan 2022-2028, and the Bray Municipal District Local Area Plan 2018- 2024, **would constitute an acceptable quantum of development at this accessible location** which would be served by an appropriate level of public transport, social and community infrastructure, **would provide an acceptable form of residential amenity for future occupants, would not seriously injure the visual amenities of the area or the amenities of property in the vicinity, would be acceptable in terms of urban design, height and scale of development**, would be acceptable in terms of traffic safety and convenience, would not be at risk of flooding or increasing the risk of flooding to other lands, and would be capable of being adequately served by wastewater, surface water, and water supply infrastructure. **The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.”***

3.2 Adjoining Lands

3.2.1 Wicklow County Council Reg. Ref. 2560207

On 24th March 2025, a planning application was submitted to WCC for Phase 2 of the overall Sea Gardens Development. The proposed scheme will deliver mixed-use development (residential, retail and commercial uses), including the provision of 341 no. residential units (houses, duplex own-door units and apartments), a hotel (including rooftop restaurant, wellbeing centre and wedding/function venue), a public house, a childcare facility, a medical centre, retail/retail services units, open spaces, car and bicycle parking, and associated supporting development infrastructure (see **Figure 3-8**).

Planning Report & Statement of Consistency with Planning Policy

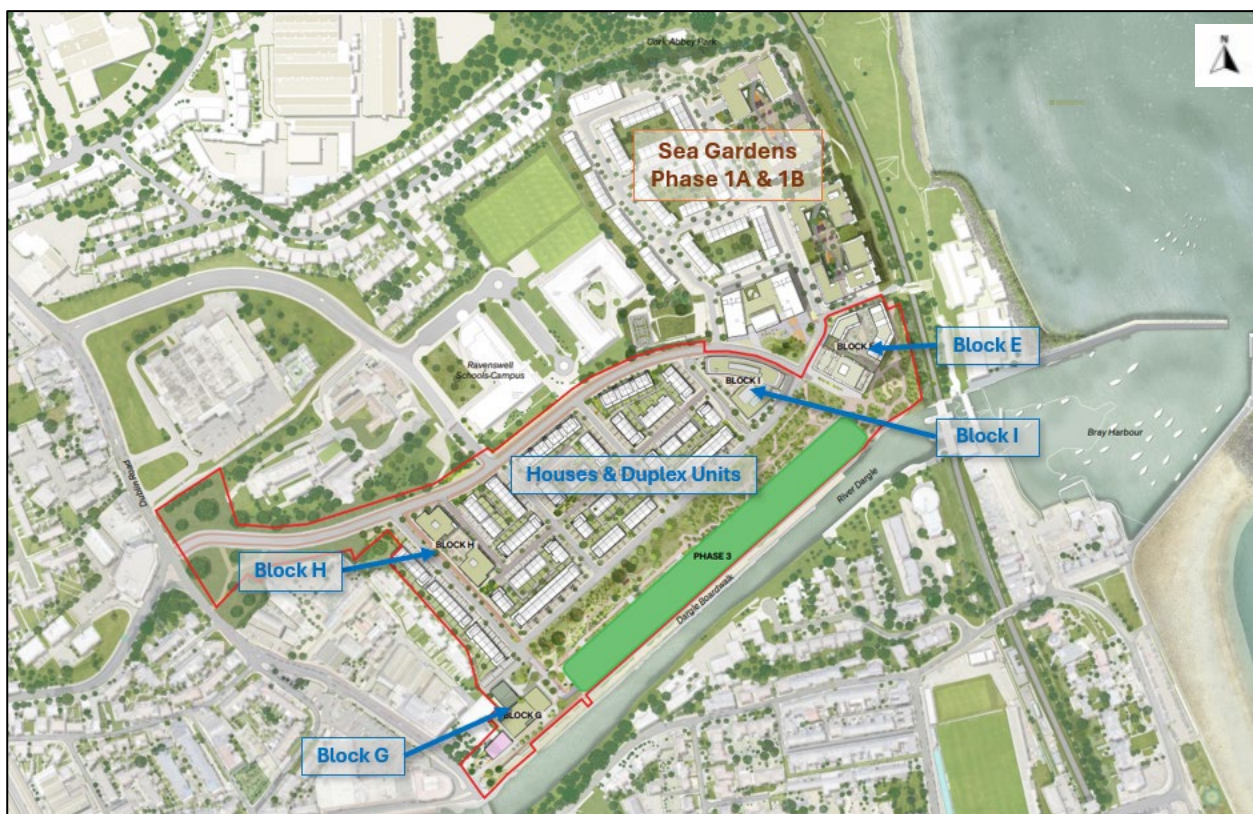


Figure 3-8: Sea Gardens Phase 2 as proposed under WCC Reg. Ref. 2560207

Source: Architectural Design Statement prepared by Howells relating to WCC Reg. Ref. 2560207

Phase 2 has been designed in accordance with the *Sea Gardens Masterplan* prepared by Howells. Proposals include taller buildings towards the coastal boundary, with Block E ranging in height from 3 to 15-storeys. This landmark building is proposed to anchor the overall Sea Gardens development and enhance the visibility of the area from various locations throughout the town and along the coastline (see **Figure 3-9**).

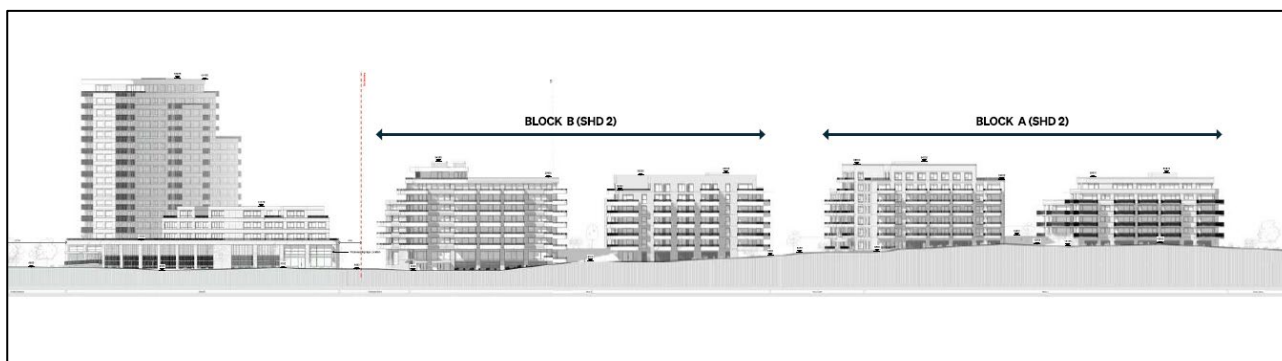


Figure 3-9: Phase 2 Block E as proposed under WCC Reg. Ref. 2560207 in the context of ABP-314686-22

Source: Architectural Design Statement prepared by Howells relating to WCC Reg. Ref. 2560207

Block E has been designed to reflect the wider revised approach to the architectural language along the coast as set out in the *Sea Gardens Masterplan*. The approach to building heights in the context of the wider Sea Gardens area is discussed in **Section 4.2.7** of this Planning Report and illustrated in greater detail in the *Sea Gardens Masterplan* and *Architectural Design Statement* prepared by Howells and enclosed as part of the subject LRD application.

A Further Information Request in relation to the planning application for Phase 2 was issued by WCC on 14th May 2025 and a response is currently being prepared by the Applicant and design team.

3.3 Conclusion

ABP's grant of permission for the most recent SHD application (ABP- 314686-22) has established a precedent for higher density development and taller buildings at the subject site. The permitted development was supported by both DLRCC and WCC, with the CE Reports both noting that the subject site is capable of accommodating an increased scale of development, and that the general layout of the proposal, comprising of 4 no. taller buildings along the site's coastal frontage, would be acceptable.

The Applicant is currently progressing with the construction of the western portion of the overall scheme as permitted under the first SHD application (ABP-311181-21). However, the Applicant no longer intends to provide Build-to-Rent apartments as permitted under the second SHD application (ABP-314686-22) and is therefore proposing an alternative design to Block A which will provide a greater proportion of family-sized homes and ensure its alignment with the requirements of the Development Plan and relevant development guidelines. The subject proposals have been designed for private sale and individual homeowners, with larger than normal apartment sizes and high-quality amenities and public open space.

The subject proposals seek to build on the improvements made to the block over the course of the previous SHD applications, and has been carefully designed with consideration for issues that were previously raised by DLRCC and ABP. The subject proposals have been designed to reflect a revised approach to the coastal corridor of the wider Sea Gardens site and will complement future revised proposals for Block B and the proposal for Phase 2 which is currently under consideration by WCC.

4 DESCRIPTION OF THE PROPOSED DEVELOPMENT

4.1 Sea Gardens Masterplan

As noted in **Section 2.1** of this Report, the proposed development forms part of the wider Sea Gardens development for which a masterplan has been prepared by Howells. In response to changes in market demand, the Applicant no longer intends to provide Build-to-Rent units in Block A as previously permitted under ABP-314686-22 (see **Section 3.1.2** of this Report). As such, the subject proposal will provide a revised housing mix, updated design, and improved residential amenity while still complying with the DLRCDP development management standards. The newly proposed design for Block A will integrate seamlessly into the wider permitted scheme and will complete the northern section of the overall masterplan area, thus advancing the *Sea Gardens Masterplan* significantly. An updated version of the *Sea Gardens Masterplan* is enclosed with this LRD planning application. **Section 2.1** of this Report provides a more detailed description of the Sea Gardens development as permitted and as proposed in both this and future applications.

4.2 Proposed Development

4.2.1 Site Layout / Overview of Development

The proposed development will comprise of Block A which will accommodate 2 no. apartment blocks (Block A1 and Block A2) over a shared 2-level podium. Including this 2-level podium, the overall heights will range 6 to 10-storeys and 7 to 11-storeys for Blocks A1 and A2 respectively. Block A will also include 9 no. townhouse units ranging in height from 3 to 4-storeys. These apartment blocks and townhouses will enclose a shared communal courtyard which will be provided over the 2-level podium.

The proposed layout is illustrated in **Figure 4-1**, with further details set out in the architectural drawings and *Architectural Design Statement* prepared by Howells and submitted as part of the planning application package.

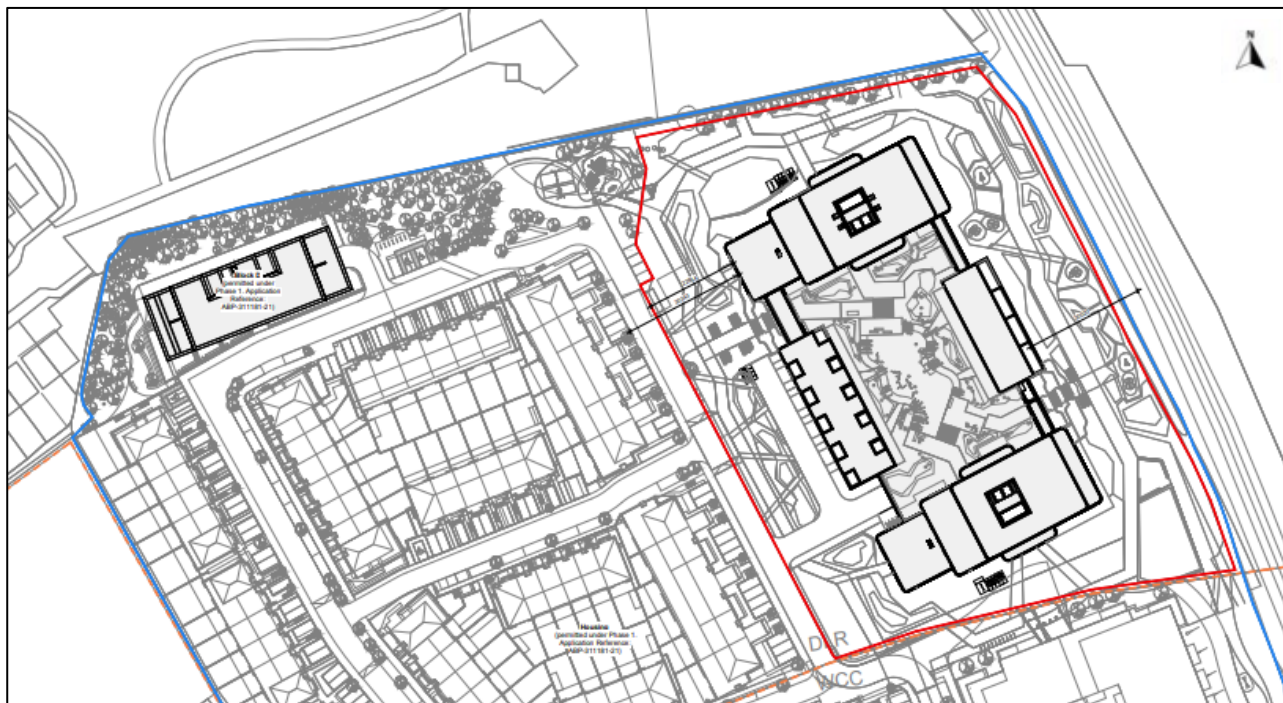


Figure 4-1: Proposed Site Layout Plan

Source: Howells (Extract of Drawing, No. BRA-HWS-BA-ZZ-D-A-10102)

Blocks A1 and A2 are aligned along the northern and southern edges of the overall block respectively. The upper floors of each block are set-back from the western edge to ensure a gradual transition in height to the existing neighbouring properties to the west, while maximising views of the sea to the east. This

Planning Report & Statement of Consistency with Planning Policy

configuration also maximises sunlight and daylight penetration into the proposed apartments, as well as into the central communal courtyard, private balconies and the surrounding public open spaces.

The proposed townhouses are located along the western and eastern edges of Block A, providing a further step down in height from Blocks A1 and A2 while delivering a sense of enclosure of the adjoining open spaces and access road. This configuration also ensures the provision of continued active frontage and passive surveillance along the access road and the seafront. A detailed description of the proposed residential accommodation is set out in **Sections 4.2.2, 4.2.3 and 4.2.4** of this Report, with further details set out in the *Architectural Design Statement* prepared by Howells and enclosed as part of this LRD application.

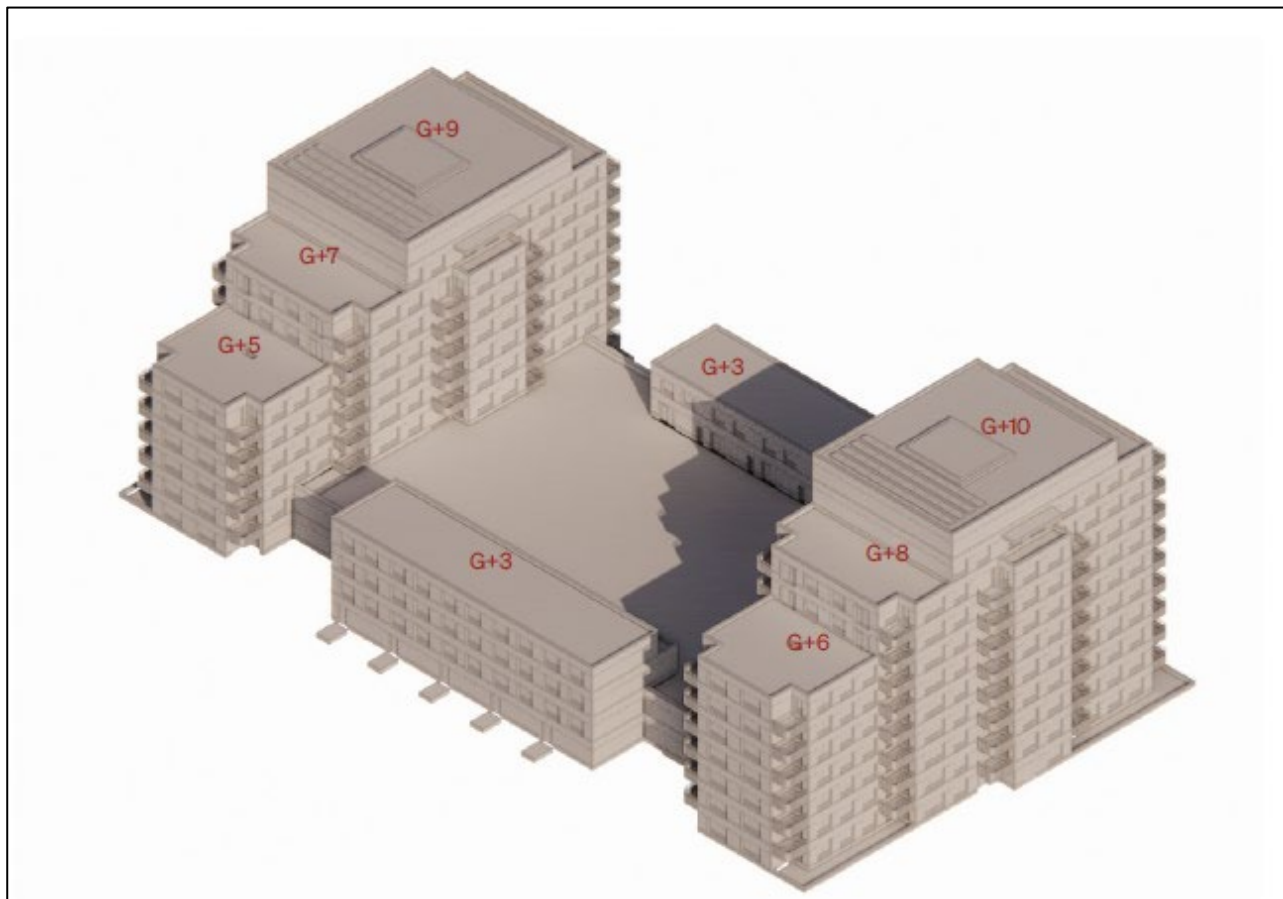


Figure 4-2: Proposed Massing and Building Heights

Source: *Architectural Design Statement (Howells)*

Car and bicycle parking will be provided within the shared 2-level podium. A detailed description of proposed parking provision is set out in **Section 4.5** of this Report. The 2-level podium will also accommodate residential amenity lounges, a communal gym, bulk residential storage areas, refuse storage, an ESB substation, and associated plant and storage areas (see **Section 4.6** of this Report).

The apartment blocks and terraced townhouses will surround a communal courtyard area, with the overall block surrounded by public open space, including play areas and pedestrian and cycle linkages to surrounding sites. The proposed public open space is generally aligned with previously approved proposals for the site (see **Section 3** of this Report), with minor updates proposed to further improve public amenity, connectivity and access arrangements. A detailed description of proposed open space and landscaping is set out in **Section 4.3** of this Report.

Access to the proposed apartment blocks and terraced houses will be via the permitted (under construction) access road located along the western boundary of the subject site, with additional pedestrian and cyclist

Planning Report & Statement of Consistency with Planning Policy

connections through the proposed public open spaces to the north, east and west. A detailed description of proposed access and connectivity is set out in **Section 4.4** of this Report.

4.2.2 Block A1

Block A1 (the northern apartment block) will range in height from 6 to 10-storeys and will include 69 no. dual aspect units comprising of 22 no. 1-bedroom units, 26 no. 2-bedroom units and 21 no. 3-bedroom units.

The ground floor will accommodate a lobby, c. 169.7sq. m communal lounge, c. 169.3sq. m communal gym, water storage, bin stores and bicycle stores. The second level within the podium of Block A1 will accommodate a lobby, a c. 52.9sq. m cinema room, and services rooms.

4.2.3 Block A2

Block A2 (the southern apartment block) will range in height from 7 to 11-storeys and will include 81 no. dual aspect units comprising of 26 no. 1-bedroom units, 32 no. 2-bedroom units and 23 no. 3-bedroom units.

The ground floor will accommodate perimeter external facing own-door apartments, a lobby, a bulky waste room, bin store and bicycle stores. The second level within the podium of Block A2 will accommodate apartments, a lobby area, and 2 no. residential bulk storage rooms.

4.2.4 Townhouses

A terrace of 5 no. 3 to 4-storey, 4-bed townhouses are proposed on the western boundary of the overall block. These units will include a private garage at ground floor level, private terraces at podium level and private terraces at Level 02.

A terrace of 4 no. 3 to 4-storey, 4-bed townhouses are proposed on the eastern boundary of the overall block. These units will include private terraces overlooking the Irish Sea at Level 02.



Figure 4-3: Proposed Townhouse (western townhouse on left side)

Source: Architectural Design Statement (Howells)

4.2.5 Residential Density

The subject proposals will provide a total of 159 no. units on an application site of c. 1.38 hectares, resulting in a gross residential density of 115 units per hectare (uph). The net site area (developable site area) equates to 1.18 hectares, resulting in a net residential density of 134 uph.

Planning Report & Statement of Consistency with Planning Policy

The proposed Block A development in combination with the near-completed Shoreside Park development to the west (as permitted under ABP-311181-21) will provide an overall net density of 85 uph within DLRCC's administrative area.

The proposed residential density is discussed in greater detail in **Section 5.3** and **Section 7** of this Report, with further details provided in the *Architectural Design Statement* prepared by Howells.

4.2.6 Residential Mix

As previously noted, the Applicant no longer intends to construct Build-to-Rent apartments as permitted under the second SHD application (ABP-314686-22). In this context, the proposed Block A will provide fewer 1-bedroom units and more family-sized units. **Table 4-1** summarises the proposed residential mix.

Table 4-1: Summary Schedule of Accommodation

Development Element	Number of Residential Units
Block A1	69 no. units
1-bedroom apartments	22 no. units
2-bedroom apartments	26 no. units
3-bedroom apartments	21 no. units
Block A2	81 no. units
1-bedroom apartments	26 no. units
2-bedroom apartments	32 no. units
3-bedroom apartments	23 no. units
Terraced Houses	9 no. units
Western 4-bedroom houses	5 no. units
Eastern 4-bedroom houses	4 no. units
TOTAL	159 no. units

Source: Howells

A percentage breakdown of this residential mix is provided below:

- 1-bedroom units: **30%**
- 2-bedroom units: **36%**
- 3-bedroom units: **28%**
- 4-bedroom units: **6%**.

4.2.7 Building Height

As illustrated in the *Sea Gardens Masterplan* and the *Architectural Design Statement* prepared by Howells, which are enclosed as part of this LRD application, a revised design approach is proposed for the coastal portion of the overall Sea Gardens development. The revised approach will provide a series parallel taller buildings configured in an east-west direction, perpendicular to the coast, with building heights gradually increasing towards the sea and towards the southern portion of the overall Sea Gardens development.

This configuration, which is reflected in the current proposals for Block A, will be replicated in a future revised planning application to WCC for Block B - ensuring continuity in terms of the architectural language along the eastern edge of the overall Sea Gardens development.

As illustrated in **Figure 4-4**, the revised approach, as applied to Block A, will provide taller elements of 10 and 11-storeys along the coastline with the upper floor stepped back, to address the scale of the Irish Sea, with the proposed townhouses on this eastern side providing a further step down to 3 storeys with a stepped back 4th storey. Blocks A1 and A2 will then be stepped down to 6 and 7 storeys respectively at the western boundary of the site, with the proposed townhouses on this side providing a further step down to 4 storeys.

Planning Report & Statement of Consistency with Planning Policy

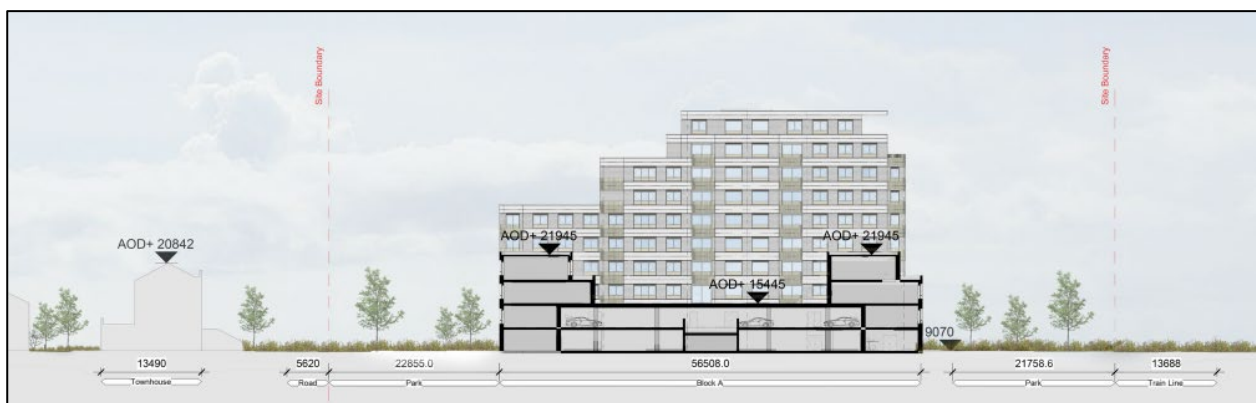


Figure 4-4: Section of Block A proposal and Shoreside Park to the west

Source: *Architectural Design Statement (Howells)*

The proposed building heights are discussed in greater detail in **Section 5.4** and **Section 7.4.1** of this Report, with further information set out in the *Architectural Design Statement* prepared by Howells.

4.2.8 Materials and Finishes

The *Sea Gardens Masterplan* sets out a design strategy for the modern reinterpretation of the Bray's building typologies and their coastal context, including the choice of materials and finishes. The proportions of facades and key features, such as windows and doors, are referenced in a contemporary manner in the subject proposals.

In addition to referencing the vernacular material palette of Bray, Block A's architectural language draws inspiration from modernist seaside architecture. This style is characterised by the horizontal lines and curved corners as shown in the proposed design and aims to achieve seamless integration with the site's coastal setting.

Brickwork elements of the proposed development are composed of two tones, with a lighter brick being used for horizontal elements to provide a visual link with the surrounding expansive views, and a darker brick which will be used to frame the windows of Blocks A1 and A2 and create a contrast with the lighter tone.

Window treatments have been designed to maximise views out to both the coast and further inland. This will be achieved through the use of wide, panoramic windows and sills which have been detailed to echo the neighbouring housing. Together, these elements will establish a visual connection with the surrounding architecture and landscape.

More detailed information on the proposed materials and finishes for the proposed development and how it integrates with the elements of Sea Gardens being completed within Shoreside Park is provided in the *Architectural Design Statement* prepared by Howells.

4.3 Open Space and Landscaping

4.3.1 Public Open Space

The proposed development has been designed with consideration for the existing character and landscape setting of the wider Sea Gardens area. The landscape design approach reflects the site's prominent location on the Bray waterfront and near the banks of the River Dargle while maintaining the open character of the previous land uses. The proposed development has been designed to integrate with permitted elements of Sea Gardens and will further provide new trees and other planting, as well as play facilities and street furniture.

The open space and landscape strategy for the proposed development seeks to seamlessly integrate the new development into the landscape character of the area to create attractive, usable and linked open

Planning Report & Statement of Consistency with Planning Policy

spaces. The public areas are designed as landscape spaces and green links that offer the opportunity for meeting, walking, and play.

Some c. 7,797.34sq. m of public open space is proposed for Block A and will integrate with existing green areas to the west of the site, Corke Abbey Valley Park to the north, future Sea Gardens development areas to the south, and the site boundary and coastline to the east.

Key elements of the proposed public open space include:

- Integration with the Green Spine as permitted under ABP–311181-21 and recently constructed as part of Phase 1 of the wider Sea Gardens development;
- Extension of the Green Spine within the subject application's site boundary;
- Provision of c. 343sq. m of dedicated play areas located in the north of the site;
- Provision of c. 178sq. m of fitness areas located on the eastern side of the public open space;
- Extensive pathways, planting and all other associated landscaping works.

Figure 4-5 below shows the proposed public open space for Block A at ground floor level, including the various landscaping features and types of space including play areas, fitness areas, etc.



Figure 4-5: Proposed Public Open Space

Source: *Landscape Report (BSLA)*

Further details in relation to the proposed public open space is set out in the *Landscape Report* prepared by BSLA and enclosed as part of this LRD application. Assessment of the proposed development's compliance with public open space objectives as set out in the DLRCDP and relevant guidelines is provided in **Section 5.10** and **Section 7** of this Planning Report.

4.3.1.1 Play Areas

The proposed development will provide a total of c. 343sq. m of play spaces, designed to accommodate children of all ages. These spaces will comprise of 2 no. 'kickabout' green areas, intended for informal play,

Planning Report & Statement of Consistency with Planning Policy

and 2 no. 'natural play' areas which will feature non-prescriptive play facilities incorporating natural landscaping elements and encourage social interaction with accompanying adults.

Figure 4-5 illustrates the locations, extent and type of play areas provided across the Block A site. Further details in relation to the proposed play areas are provided in the *Landscape Report* and associated drawings prepared by BSLA and enclosed as part of this LRD application.

4.3.1.2 Links to Adjoining Open Spaces

The proposed development has been designed in response to the existing site context and permitted development in the area. In this regard, pedestrian and bicycle routes are proposed to connect to neighbouring areas, including links and interfaces with the adjoining Shoreside Park development (permitted under ABP-311181-21), a link to Corke Abbey Valley Park, and access to future development to the south of the application site. **Figure 4-6** below shows the proposed pedestrian and cycle connections.

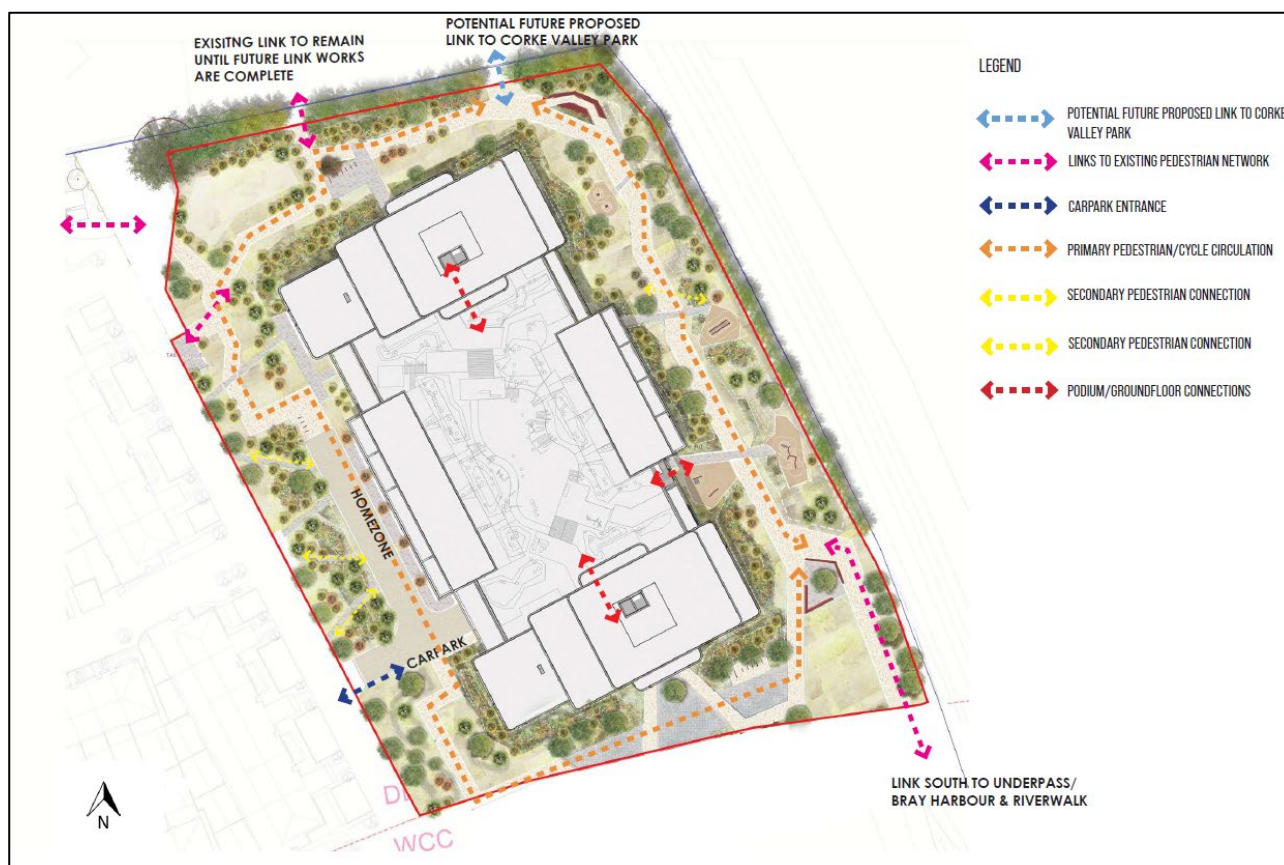


Figure 4-6: Proposed Access & Linkages

Source: *Landscape Report* (BSLA)

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

The *Landscape Report* and associated drawings prepared by BSLA and enclosed as part of this request provides further information in relation to the proposed development's linkages within the subject site and to the surrounding urban area.

4.3.1.3 Boundary Treatments

The proposed Block A development will include a range of boundary treatments to ensure that appropriate interfaces with existing development and public spaces which surround the application site are provided.

Planning Report & Statement of Consistency with Planning Policy

Given the application site’s relatively confined boundary, many of the boundary treatments will be as permitted under ABP–311181-21. Proposed and existing boundary treatments are shown in **Figure 4-7**.



Figure 4-7: Proposed Boundary Treatments

Source: Landscape Report (BSLA)

Further information in relation to boundary treatments is set out in the *Landscape Report* and associated drawings prepared by BSLA and enclosed as part of this LRD application.

4.3.2 Communal Open Space

Communal open space for Block A will be delivered in the form of a central communal courtyard of c. 1,692sq. m which be enclosed and overlooked by Blocks A1, A2 and the proposed townhouses (see **Figure**

Planning Report & Statement of Consistency with Planning Policy

4-8). The manner in which the requirements set out in the DLRCDP and the *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)* are set out in **Section 7** of this Planning Report.



Figure 4-8: Proposed Communal Courtyard Space

Source: Extract of Drawing No. DN2504 (BSLA)

The central courtyard will include a range of smaller, individual amenity spaces for use by residents including secluded seating areas and formal and informal play elements. A raised viewing platform will be provided on the eastern side of the courtyard with views out to the Irish Sea. Planting has been designed to create buffers and visual screens between the circulation paths, seating areas and private terraces.

Access will be provided between the courtyard and ground floor level by stepped walkways at the eastern and western sides of the podium. The proposed townhouses will also have access to the courtyard from their private terraces. Access to Blocks A1 and A2 will be provided via entrances at the north and south of the courtyard respectively.

A *Daylight and Sunlight Assessment Report* has been prepared by 3DDB and highlights that the subject proposals represent a significant improvement over the previously approved Block A development (ABP - 314686-22) in terms of delivery of Sun On Ground (SOG) within the communal courtyard. Further details are

Planning Report & Statement of Consistency with Planning Policy

provided in the *Daylight and Sunlight Assessment Report* prepared by 3DDB and enclosed as part of this LRD application.

Further details in relation to the proposed communal courtyard are set out in the *Landscape Report* and Drawing No. DN2504 prepared by BSLA and enclosed as part of this LRD application.

4.3.3 Private Open Space

All proposed apartment units and townhouses will be provided with balconies or terraces. These private open spaces are oriented to overlook proposed public open spaces and capture sea and landscape views where possible, while ensuring appropriate separation distances to opposing windows or other balconies / terraces. The proposed balconies and terraces will achieve minimum required depths to allow residents to furnish and utilise these spaces fully.

Section 5.10.3 and **Section 7** of this Report provide assessment of proposed private space provision with regards to the DLRCDP and relevant guidelines. The *Housing Quality Assessment*, prepared by Howells and enclosed as part of this LRD application provides further detailed information regarding the proposed private open space provision.

4.4 Access and Connectivity

The application site will be accessed from the Dublin Road (R761) via the Northern Access Road which forms the eastern and northern boundaries of Lidl (former Industrial Yarns site), and the Southern Access Road which facilitates access from Castle Street via the Ravenswell Road. Street typology and green links are aligned with public plazas and open spaces to create a strong urban layout that ensures visual permeability through the overall Sea Gardens site to create a highly legible network of pedestrian and cyclist routes. The proposed pedestrian / cycle routes will tie in with a wider network of routes within the masterplan area. The geometry of roads within the proposed scheme caters for all forms of movement however the layout of the proposed development has been designed to favour walking, cycling and public transport and to tie in with the planned public transport bridge.

4.5 Parking

4.5.1 Car Parking

A total of 166 no. parking spaces are proposed within Block A's shared 2-level podium, of which 9 no. will be accessible spaces. The 5 no. proposed townhouses along the western edge of Block A will include private garages within the curtilage of each dwelling, bringing the overall quantum of parking to 171 no. spaces.

The locations of these parking spaces are illustrated on Drawing Nos. BRA-HWS-BA-00-D-A-20100 and BRA-HWS-BA-01-D-A-20099 prepared by Howells.

Justification for this proposed quantum of car parking is set out in the *Traffic Impact Assessment* prepared by Atkins (see also **Section 5.8** and **Section 7** of this Planning Report).

The development will include electric car charging points at a rate of 10%. All remaining spaces will be provided with the infrastructure to enable the provision of additional electric charging points in the future.

All on-curtilage parking associated with the proposed townhouses on the western edge of Block A will be fully served by EV ducting to be activated as required in the future by the individual owners.

The *Traffic Impact Assessment* enclosed with this LRD application provides a detailed analysis of the proposed car parking space provision.

4.5.2 Motorcycle Parking

. A total of 8 no. motorcycle spaces will be provided at mezzanine level within the shared 2-level podium, as illustrated in Drawing. No. BRA-HWS-BA-01-D-A-20099 prepared by Howells.

The *Traffic Impact Assessment* prepared by Atkins enclosed with this LRD application provides a detailed analysis of the proposed motorcycle parking space provision.

4.5.3 Bicycle Parking

Secure bicycle spaces are proposed within the shared 2-level podium in close proximity to main entrances for convenience. Sheffield-type stands will be provided at a rate of 1 stand per unit and 1 stand per 5 units for visitors, equating to a total of 207 no. Sheffield-type stands. 33 no. of these stands will be dedicated for visitors and will be located at surface level, outside the podium. The remainder of the long stay cycle parking (158 no. spaces) will be provided in double-stacked arrangements within the podium. In addition to these 365 no. dedicated spaces, each of the 9 no. townhouses will have ample storage space for multiple bikes.

Assessment of the proposed provision of cycle spaces in accordance with the DLRCDP and Compact Settlements Guidelines is set out in **Section 5.9** and **Section 7** of this Report and in the *Traffic Impact Assessment* by Atkins.

4.6 Site Services

4.6.1 Lighting

The proposed public lighting is designed to provide a level of brightness that will minimise incidences of light spillage or pollution on neighbouring developments and biodiversity in the surrounding area. The lighting design is fully integrated with the landscape strategy. Proposed public lighting is set out in the *Lighting Report* prepared by Metec and enclosed with this LRD application.

4.6.2 Refuse

Refuse collection and deliveries will be facilitated through the surrounding streets permitted under ABP–311181-21. Under this permission refuse and delivery vehicles are predominantly facilitated via looped streets that facilitate through movement of such vehicles. In instances where a looped route is not possible turning is facilitated via turning heads.

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

Each of the proposed townhouses will have adequate storage provision within the curtilage of the dwelling to facilitate the sorting and storage of waste.

Further details are set out in the *Outline Operational Waste Management Plan* prepared by Atkins and the *Housing Quality Assessment* prepared by Howells which are enclosed with this LRD planning application.

4.6.3 ESB Substation

The proposed development includes the provision of 2 no. ESB substations and 1 no. associated switchroom on the eastern side of Block A at ground floor level. The requirements of the ESB are set out in the *Utilities Report* prepared by Metec which is enclosed with this LRD application.

4.7 Water Supply and Drainage

4.7.1 Surface Water Drainage

Surface water drainage for the proposed development site will employ SuDS techniques including permeable paving, swales in park areas adjacent to roads, green roofs, filter drains to rear gardens, modular underground attenuation and flow control devices and will outfall via attenuation/storage tanks. Further details are provided in the *Stormwater Impact Assessment Report* prepared by Atkins and submitted as part of this application.

4.7.2 Foul Sewer Drainage

The foul drainage network for Block A will be designed in compliance with UÉ Code of Practice for Wastewater Infrastructure UÉ-CDS-5030-03, Standard Details UÉ-CDS-5030-01. The main foul drainage within the site road network for the *Sea Gardens Masterplan* site is currently under construction as permitted under ABP-311181-21.

In accordance with UÉ requirements a, Pre-Connection Enquiry (PCE) has been issued to UÉ Developer Services (CDS) to confirm the capacity for the number of proposed units. A *Confirmation of Feasibility* is included within the *Engineering Report* enclosed as part of this planning application.

Further details on the proposed foul drainage network are provided in the *Engineering Report* prepared by Atkins and enclosed with this application.

4.7.3 Water Supply

The potable water supply network for Block A will be designed in compliance with UÉ Code of Practice for Water Infrastructure UÉ-CDS-5020-03 and Standard Construction Details UÉ-CDS-5020-01. The water supply network within the *Sea Gardens Masterplan* site is currently under construction as permitted under ABP-311181-21.

In accordance with UÉ requirements, a PCE has been issued to UÉ Developer Services (CDS) to confirm the capacity for the number of proposed units. A *Confirmation of Feasibility* is included within the *Engineering Report* enclosed as part of this planning application.

Further details on the proposed water supply network are provided in the *Engineering Report* by Atkins and enclosed with this application.

4.7.4 Flood Risk Assessment

A *Stage 1 Flood Risk Assessment* prepared by Atkins is included as part of this LRD application. A detailed and robust analysis of the flood risk at and in the vicinity of the application site was undertaken. This assessment concludes that the development as proposed will not result in an adverse impact to the existing hydrological regime of the area, nor increase flood risk to areas outside of the landowners' holdings, nor create unacceptable levels of flood risk within the proposed development and is therefore considered to be appropriate from a flood risk perspective.

4.8 Taking in Charge

The entirety of the proposed development will be retained within the control of the Owner Management Company. A *Property Management Strategy Report* has been prepared by Aramark and is enclosed as part of this LRD planning application. It provides detail with respect to the management of public spaces, communal areas, parking and shared facilities.

4.9 Social and Affordable Housing (Part V)

In accordance with Section 96, Part V of the *Planning and Development Act 2000*, a total of 16 no. units will be transferred to the planning authority for social and affordable housing. 14 no. of these units are located outside of the planning application boundary and have been constructed as permitted under ABP-311181-21. 2 no. units in the proposed Block A1 will make up the remainder of the Part V provision for the LRD planning application.

The location of units proposed to be transferred to meet Part V requirements is illustrated in **Figure 4-9** with full details set out in the Part V Drawing Nos. BRA-HWS-BA-ZZ-D-A-10104, BRA-HWS-BA-00-D-A-10107 and BRA-HWS-BA-ZZ-D-A-10106 prepared by Howells and enclosed as part of this application. A summary of costings in relation to Part V is also included with this application, along with a letter of agreement from DLRCC (dated 25th July 2025).

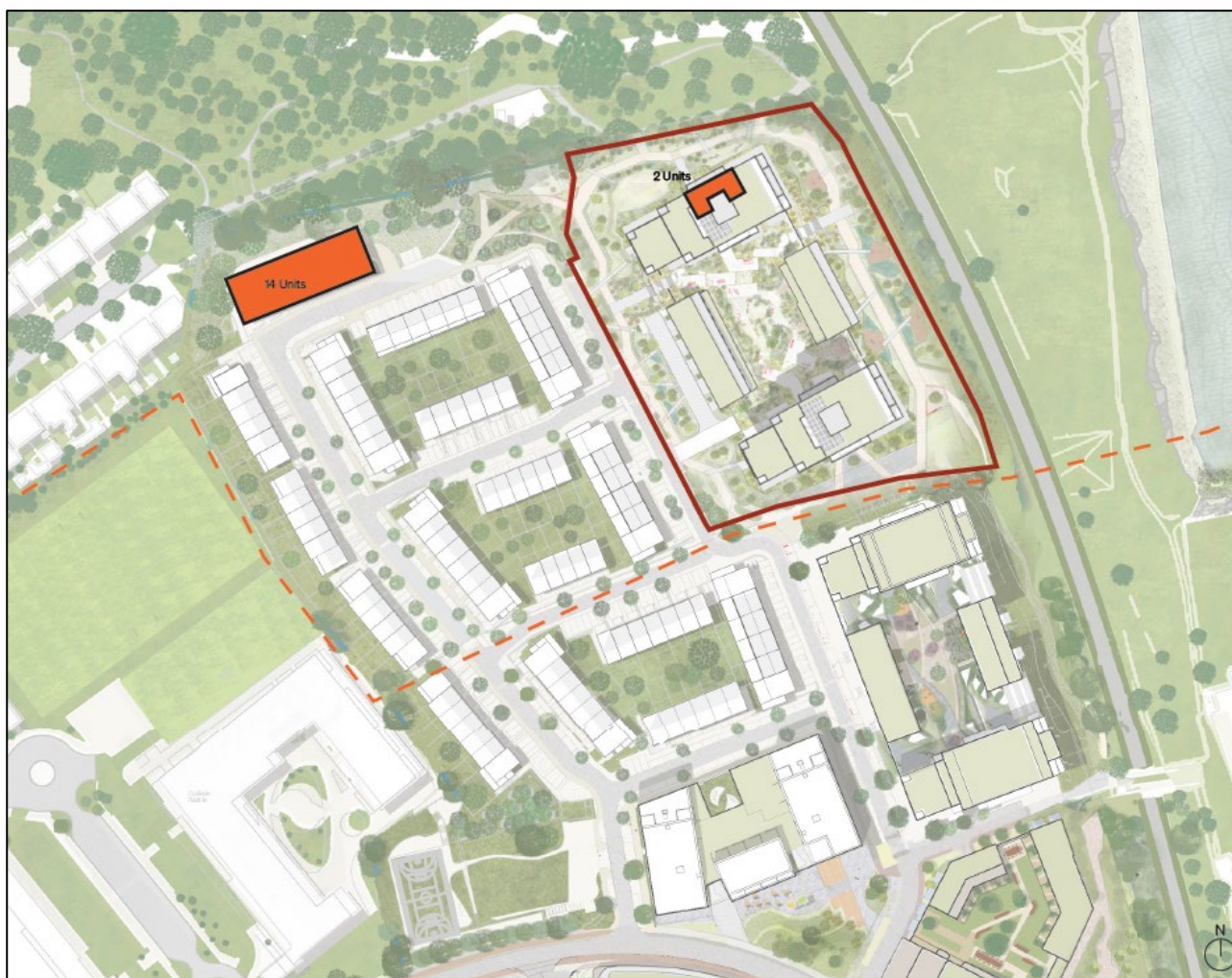


Figure 4-9: Proposed Part V Provision

Source: *Architectural Design Statement (Howells)*

4.10 Childcare Facility

A childcare facility providing a total of 88 no. spaces was previously permitted as part of the wider development under ABP-311181-21. This facility is located in Block C to the southwest of the Block A application site. The childcare facility was designed to cater for the entire Phase 1 development under ABP-311181-21, including Block A and Block B as originally proposed.

A *Childcare Facility Capacity Assessment* has been prepared by RPS and is enclosed as part of the subject LRD planning application. Having consideration for existing and permitted childcare facilities in the study area, population demographics, relevant policy and guidelines, the assessment concludes that the permitted childcare facility at Block C (under ABP-311181-21) will have capacity to cater for anticipated childcare requirements of Block A.

5 ASSESSMENT OF KEY PLANNING ISSUES

5.1 Introduction

This section of the Planning Report focuses on key planning issues that were raised during pre-application consultations with DLRCC. While additional matters are noted in DLRCC's LRD Opinion, and are addressed in the enclosed *Statement of Specific Information Requirements* prepared by RPS, the following headings are considered to represent the most pertinent matters and are addressed in greater detail in this section of the Planning Report:

- Principle of Development
- Density
- Building Height, Scale, Massing and Design
- Visual Impact
- Daylight, Sunlight and Overshadowing
- Access, Connectivity and Traffic
- Car Parking
- Bicycle Parking
- Open Space
- Childcare Facility

The proposed development has been designed in accordance with national, regional and local planning policy and relevant development guidelines. **Section 7** of this Planning Report provides a *Statement of Consistency with Planning Policy*, includes an analysis of how the proposed development is fully in accordance with these policy documents and guidelines.

5.2 Principle of Development

The proposed development will deliver much needed residential units on an appropriately zoned, infill site located within the built-up area of Bray, delivering a sustainable density and compact urban. The subject site is served by existing high-capacity public transport services will also benefit from planned future public transport in the area (see **Section 2.2** of this Planning Report). The subject proposals have been informed by the *Sea Gardens Masterplan*, prepared by Howells and submitted as part of the LRD application, which provides an overarching plan for the wider area to ensure that the proposed development integrates seamlessly within the surrounding environment and supports, and is supported by, existing local facilities and transport connections.

As detailed in **Section 3** of this Planning Report, a comparable development was previously permitted on the subject lands, confirming the appropriateness of the proposed land use and development in principle. In this regard, ABP's Inspector's Report relating to ABP-314686-22 acknowledged the strategic location of the subject site and the proposed scale of development and concluded that: "*I am satisfied that the principle of the proposed development is acceptable on these lands*".

With regard to land use and zoning objectives, and as illustrated in **Figure 5-1** of this Planning Report, the majority of the subject site is zoned Objective A which seeks "*to provide residential development and improve residential amenity while protecting the existing residential amenities*". The remaining lands within the subject site are zoned Objective F which seeks "*to preserve and provide for open space with ancillary active recreational amenities*". In this regard, the proposed development, which seeks to provide a new residential development on the Objective A lands and landscaped public open space on the Objective F lands, is considered to be fully consistent with the zoning objectives for the site.

Planning Report & Statement of Consistency with Planning Policy

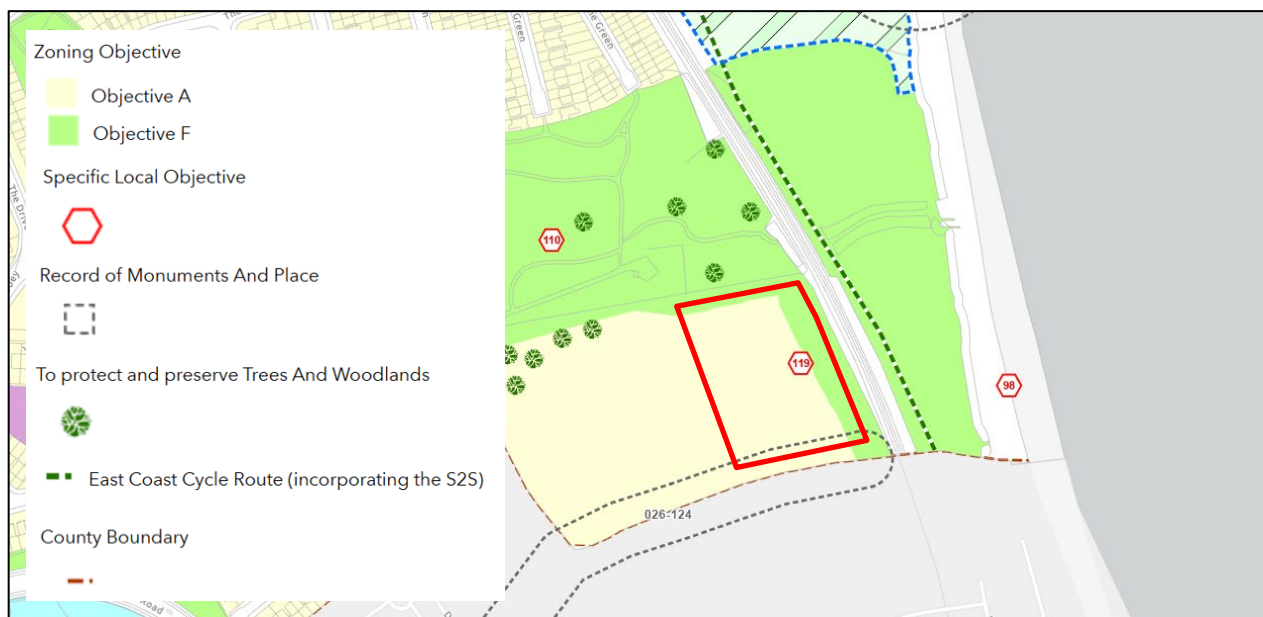


Figure 5-1: Land Use Zoning Objectives (site location in outlined red)

Source: DLRCDP Zoning Map Extract

The subject site also includes a Specific Local Objective (SLO 119) which seeks “to provide a permeability link between the Green Area/Linear Park between Corke Abbey and Woodbrook Glen, and any development on the Former Bray Golf Club lands to allow access towards Bray Harbour”. In this regard, the subject proposals will deliver landscaped public open space along the eastern portion of the site, as well as public space along the western portion of the site, providing new pedestrian and bicycle connections to Corke Abbey Valley Park and facilitating access to Bray Harbour and beyond. The subject proposals are therefore considered to be fully consistent with SLO 119.

Having regard for the above, it is considered that the proposed development is fully in accordance with the land use zoning objectives set out in the DLRCDP and represents an appropriate use of the subject site. The proposed development will deliver 159 no. new residential units on an infill site within the built-up area of Bray and in close proximity to public transport and local services and facilities. The development, which is comparable with the previously approved scheme under ABP-314686-22, is therefore considered to be entirely appropriate for the subject site in principle.

5.3 Density

The DLRCDP supports the provision of higher densities at appropriate locations and notes that “the objective is to optimise the density of development in response to type of site, location and accessibility to public transport”. Policy Objective PHP18 expands on this, stating that it is a Policy Objective of the DLRCDP to:

- “Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12”; and
- “Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”

In line with these objectives, the overall Sea Gardens development seeks to provide a sustainable density that is appropriate for this centrally located urban area, with higher density developments located along the coastline, including the subject proposals for Block A.

The proposed development represents an improvement on the permitted scheme as it provides a more balanced mix of unit sizes while maintaining an appropriate density for this location. Having regard for the above, it is considered that the proposed development is fully supported by, and in accordance with, DLRCDP’s density objectives.

Planning Report & Statement of Consistency with Planning Policy

With regard for development density targets, the DLRCDP refers to section 28 guidelines which have since been superseded by the Compact Settlements Guidelines. The Compact Settlements Guidelines aim to address the need for more compact development in Ireland by outlining the process for setting density targets for local authorities relative to the scale of the present built environment and proximity to transportation nodes.

Section 3.3. of the Compact Settlements Guidelines set out density ranges for different settlements and area types. It is considered that the subject site falls under the definition of “*Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods*” as per Table 3.3 of the guidelines. Such areas are described as follows:

*“The centre and urban neighbourhoods category includes: (i) the town centre and immediately surrounding neighbourhoods, (ii) strategic and sustainable development locations, and (iii) lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8). It is a policy and objective of these Guidelines that **residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns**” (RPS emphasis in bold).*

As set out in **Section 4.2.5** of this Planning Report, the proposed application boundary extends to c. 1.38 hectares, with a total of 159 no. units proposed. This amounts to a gross density of 115uph and a net density of 134uph, which is entirely in line with the density range set out above.

The subject proposals should also be considered in the context of the wider permitted scheme. In this regard, it is highlighted that an overall net density of 85uph within DLRCC’s administrative boundary will be provided through the delivery of:

- Block A, as now proposed; and
- The Sea Gardens Phase 1 development (Shoreside Park), as permitted under ABP Ref-311181-21.

A breakdown of density calculations is set out in the *Sea Gardens Masterplan* prepared by Howells and included as part of this application.

This overall net density of 85uph for the wider Sea Gardens site within DLRCC’s administrative boundary is in line with the density range for this location, as set out in the DLRCDP and the Compact Settlements Guidelines and is considered appropriate given the proximity of the site to the Bray Daly Railway Station, the Dublin-Bray Bus Corridor and Bray’s town centre. The density is also comparable to that previously permitted by ABP under ABP-314686-22. As discussed in **Section 4.2.5** of this Planning Report, the wider Sea Gardens development has been designed to provide a gradual increase in density from west to east, ensuring an appropriate transition in scale to the existing, lower density developments located to the west of the wider landholding.

The Compact Settlements Guidelines note that central to the provision of higher densities is the provision of quality urban design and placemaking. Section 4.4 of the guidelines sets out key indicators which shall be considered in the assessment of development proposals in this regard. **Section 7.2.3** of this Planning Report, and Section 5.1 of the *Architectural Design Statement* prepared by Howells, illustrates how the subject proposals have been carefully designed with regard for these key indicators.

The Compact Settlements Guidelines also include development standards for new residential schemes, including 4 no. SPPRs to which proposed developments must adhere. These SPPRs relate to the provision of minimum separation distances (SPPR1), minimum private open spaces (SPPR2), maximum car parking provision (SPPR3), and minimum bicycle storage provision (SPPR4). In this regard, the proposed development will be fully in accordance with these SPPRs, as described elsewhere in this Planning Report as well as in the *Architectural Design Statement* prepared by Howells and the *Traffic Impact Assessment* prepared by Atkins. Full details of compliance with the SPPRs are set out in the *Statement of Consistency with Planning Policy* provided in **Section 7.2.3** of this Planning Report.

Having regard for the above, it is considered that the density proposed for the development is fully in accordance with the Compact Settlement Guidelines and is entirely appropriate for the subject site. We would further note that the proposed net density has been considered to be acceptable in principle by the planning authority, with the LRD Opinion stating that:

“Having regard to discussions undertaken in the LRD Meeting (Stage 2), the Planning Authority consider that the currently proposed net density is justified on the basis of current policy and the site’s sustainable location”.

5.4 Building Height, Scale, Massing and Design

In designing the proposed scheme, careful attention was given to key issues raised in ABP’s Inspector’s Reports, and DLRCC’s Chief Executive’s Reports for the previous SHD applications relating to the site (ABP-311181-21 and ABP-314686-22 – see also **Section 3.1** of this Planning Report). In this regard, building height, scale, massing and design were considered to be of particular importance in designing the subject proposals.

The proposed design was also heavily influenced by the feedback received from DLRCC during pre-application consultations including consultations under section 247 of the Act and the formal LRD meeting under section 32D of the Act (see **Section 1.4** of this Planning Report and the *Statement of Specific Information Requirements of the LRD Opinion* prepared by RPS and enclosed as part of the LRD application package).

The subject proposals have been designed with regard for all relevant national, regional and local planning policies and guidance, with **Section 7** of this Planning Report providing a detailed *Statement of Consistency with Planning Policy*. With regard for building height, scale, massing and design, particular attention has been given to the following:

- **Section 4.4 of the Compact Settlements Guidelines.** This section sets out a number of ‘Key Indicators of Quality Design and Placemaking’ that informs the development of settlements, neighbourhoods and individual sites. The proposed development’s compliance with these key indicators is discussed in **Section 7.2.3.2** of this Planning Report, with a more detailed analysis provided in Section 5.1 of the *Architectural Design Statement* prepared by Howells and enclosed as part of this LRD planning application.
- **The Urban Development and Building Heights – Guidelines for Planning Authorities (2018).** SPPR 1 of the Building Heights Guidelines explicitly supports increased building height and density in locations with robust public transport access, stating that “*there is [...] a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility*”. This approach aligns with the objectives of the NPF and RSES, promoting compact urban growth and higher densities.

The guidelines set out high-level development management principles and more specific, performance-based criteria for Local Authorities to consider in relation to building heights. These factors are outlined in greater detail in the Statement of Consistency provided in **Table 7-8** of this Planning Report.

- **DLRCC’s Building Height Strategy, contained in Appendix 5 of the DLRCDP.** It is noted that the DLRCDP was prepared following the publication of the Building Height Guidelines and, as such, the DLRCDP’s policies and objectives align with those set out in the Building Height Guidelines. The aim of this strategy is “*to ensure the protection of the built heritage of the County and general residential amenities while encouraging higher densities and heights where appropriate*”.

The Building Height Strategy sets out policy objectives with regard to building height, with Policy Objective BHS 1 identifying areas which may be suitable for increased height:

“It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres [...] and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NP0 35, SPPR 1 & 3). Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above”.

The DLRCDP provides several objectives relating to the design of new residential development, with Policy Objective PHP42 seeking to “*encourage high quality design of all new developments*”. Section 12.3.1.1 of the DLRCDP sets out a number of criteria that will be taken into account when assessing

Planning Report & Statement of Consistency with Planning Policy

applications. An assessment of the subject proposals against these criteria is set out in **Section 7.4.1** of this Planning Report.

Having regard for the above, it is highlighted that the following key considerations and urban design principles have underpinned the proposed height, scale, massing and design of Block A. These considerations are discussed in detail in the *Sea Gardens Masterplan* and the *Architectural Design Statement* prepared by Howells and enclosed as part of the application package:

- The subject site represents an infill, brownfield site within the built-up area of Bray. This strategic location is well served by existing high-capacity public transport services including the DART, Commuter Rail and Intercity Rail services with Bray Daly Railway Station located c. 800m from the edge of the application site. It is also served by the Dublin-Bray Bus Corridor with several stops located along the Dublin Road. Furthermore, the proposed development will benefit from future public transport in the area with plans to upgrade train services through the DART+ Coastal South project and extend the LUAS Green Line to Bray. The site is therefore considered to be ideal for facilitating the compact urban growth of the town in accordance with national policy (see **Section 7.2** of this Planning Report). This has been confirmed by ABP and DLRCC in their assessment of the previous SHD applications relating to the subject site (see **Section 3.1** of this Planning Report). This strategic location is illustrated in **Figure 5-2**, with further details in relation to the site's accessibility set out in the *Traffic Impact Assessment* prepared by Atkins and enclosed as part of this LRD application.



Figure 5-2: Walking distances to public transport, local services and amenities

Source: *Sea Gardens Masterplan* prepared by Howells

- Given this proximity to high quality public transport services, it is considered that the subject site can accommodate taller buildings subject to an assessment against the performance-based criteria set out in Table 5.1 of DLRCC's Building Height Strategy, as provided by Policy Objective BHS 1. These criteria

Planning Report & Statement of Consistency with Planning Policy

are addressed in **Table 7-8** of this Report, with further supporting information set out in the *Architectural Design Statement* prepared by Howells and enclosed as part of this application.

- The *Sea Gardens Masterplan* has been prepared by Howells to ensure the site's wider context has been taken into consideration at a strategic level, and that the subject proposals do not only work as a stand-alone development, but as one which will sit comfortably within its surroundings and contribute to a wider vision for the area. The preparation of this masterplan ensures that the proposed height, scale, massing and design is considered with respect for surrounding existing and proposed future development within the overall Sea Gardens development, and its neighbouring areas. The *Sea Gardens Masterplan* is grounded in national, regional and local planning policy and guidelines, as well as best practice in urban design.
- While the *Sea Gardens Masterplan* has recently been updated to reflect a revised approach to building heights along the coastal edge, it has consistently located taller buildings towards the sea to provide a sustainable compact urban form while ensuring a gradual transition in terms of height and scale to the existing buildings to the west of the Sea Gardens area (see **Figure 5-3** and **Figure 5-4**). By locating taller elements towards the coast, the overall Sea Gardens development will fully utilise this unique coastal location while protecting the architectural character and amenity of the remainder of development in Bray.



Figure 5-3: Locating taller buildings towards the coast

Source: *Sea Gardens Masterplan* prepared by Howells

Planning Report & Statement of Consistency with Planning Policy

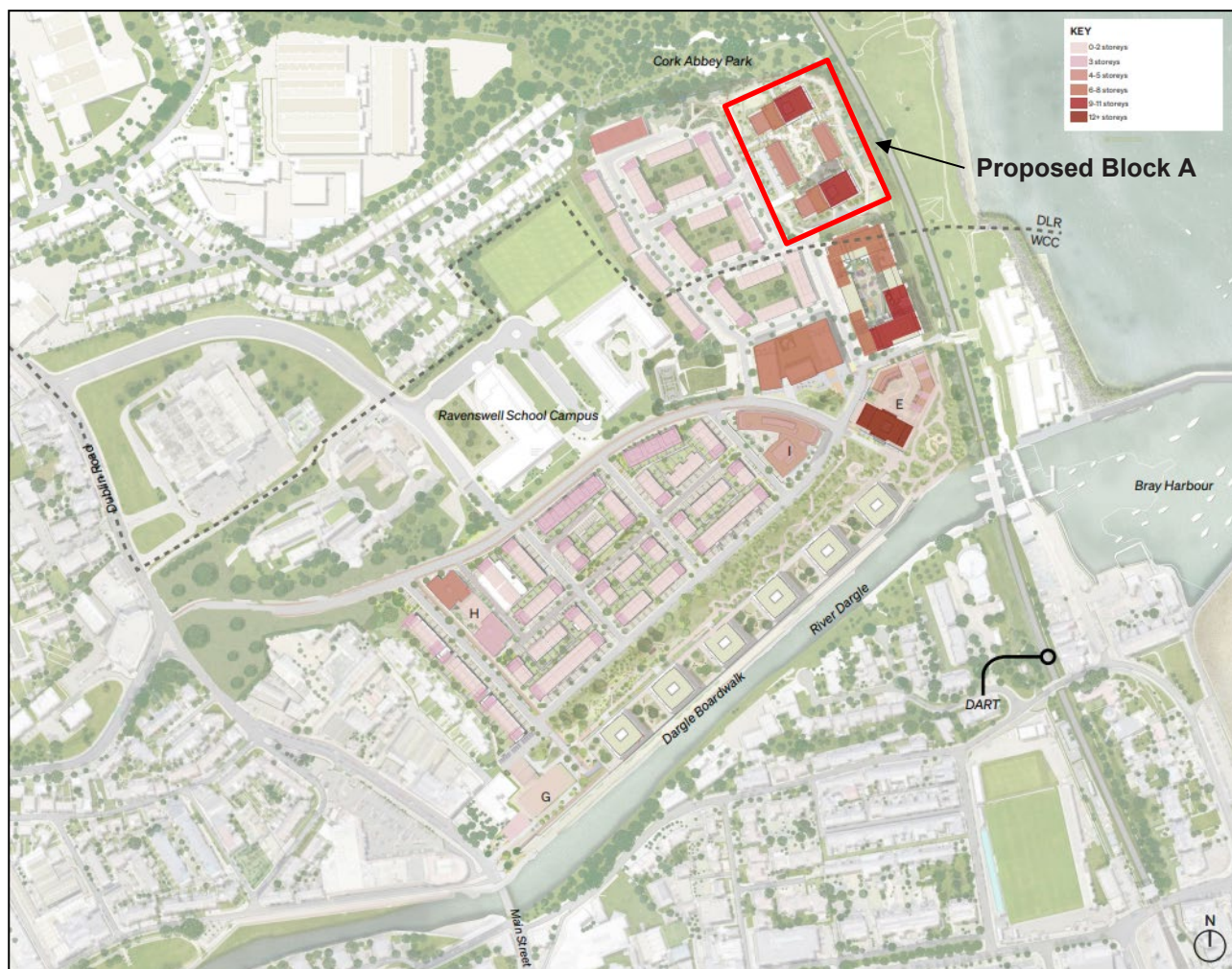


Figure 5-4: Building Heights Plan

Source: *Sea Gardens Masterplan prepared by Howells*

- The design team have recently reviewed the *Sea Gardens Masterplan* to propose a revised approach that offers further refinement to the architectural language along the coast consisting of the delivery of a series of taller finger blocks running perpendicular to the sea, tied together with lower town houses and high quality communal and public open space (see **Figure 5-5**).

This layout will provide improved east-west permeability, both visually and in movement, thereby maximising access to the seafront and better utilising the overall site's coastal location (see **Figure 5-6**). In addition, the proposed finger blocks will maximise views to the sea, significantly increase the number of dual aspect units and improve access to sunlight and daylight, while reducing overshadowing – both within the proposed finger blocks and to neighbouring development.

It is also considered that the proposed finger block arrangement will better address currently underutilised public spaces including the Croke Abbey Valley Park to the north and the greenway to the east. The revised approach will activate these spaces and improve passive supervision while providing a visual cue to invite people into the area and to make use of these amenities.

Planning Report & Statement of Consistency with Planning Policy



Figure 5-5: Conceptual revised approach to coastal corridor

Source: *Sea Gardens Masterplan prepared by Howells*

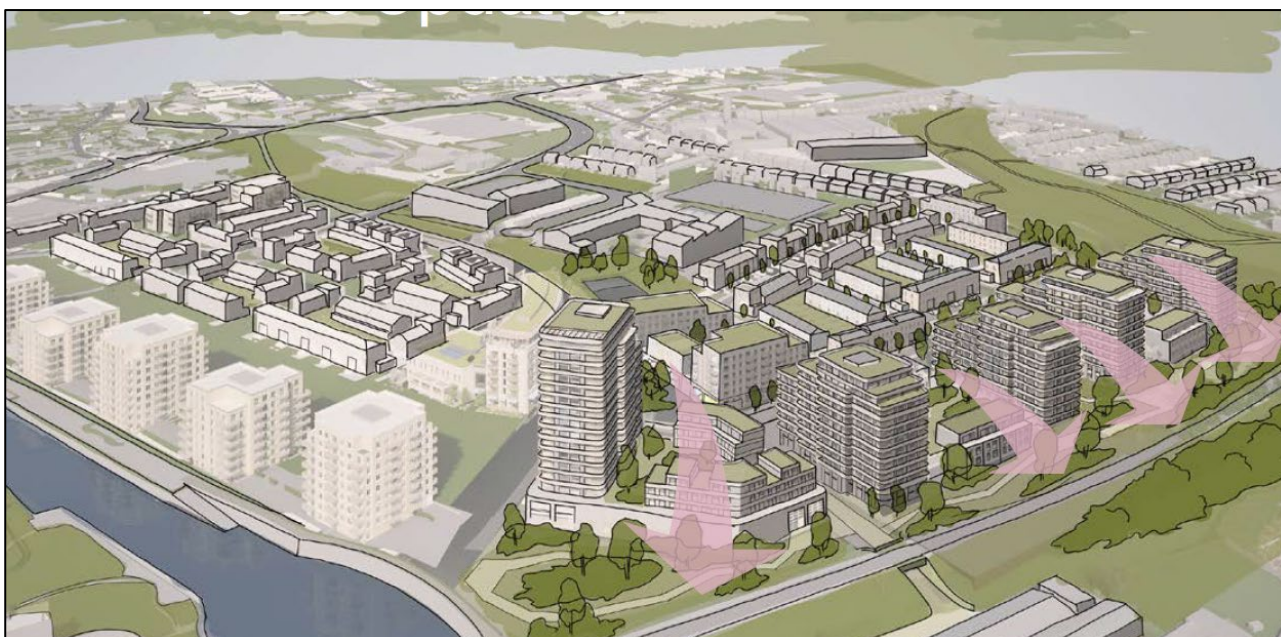


Figure 5-6: East-west permeability and utilisation of coastal setting

Source: *Sea Gardens Masterplan prepared by Howells*

- The 4 no. finger blocks in Block A and Block B will all have a similar scale and massing. This repetition will deliver a cohesive and unified architectural form along the coast. The building heights will subtly increase towards the south, terminating with a 3 to 15-storey landmark building (Block E) to identify Bray Harbour and the River Dargle, and act as a focal point for the wider Sea Gardens development. A planning application for Phase 2, which includes this landmark building, is currently being assessed by WCC (see **Section 3.2** of this Planning Report).

Planning Report & Statement of Consistency with Planning Policy

- Each finger block will be stepped down in terms of height, scale and massing to the west to ensure a gradual transition to the Phase 1 development (ABP-311181-21) which is currently being constructed and nearing completion.
- While the subject proposals seek to deliver Block A, a planning application for Block B is currently being prepared by the Applicant and will be submitted to WCC. The revised Block B development will ensure the continuity of the revised finger block arrangement along the coast and, in combination with the subject LRD application and the Phase 2 application to WCC, will ensure the delivery of the coastal portion of the overall Sea Gardens development, as illustrated in the *Sea Gardens Masterplan*.

Having regard for the above, and as summarised in **Section 4.2.7** of this Planning Report, the proposed development will deliver the northeast portion of the Phase 1 development and provide 2 no. apartment blocks with Block A ranging in height from 6 to 10-storeys, and Block A2 ranging in height from 7 to 11-storeys. Between Blocks A1 and A2, 9 no. 3 to 4-storey townhouses will be provided to provide a further step down in scale, breaking up the massing of the east and west elevations, while ensuring the activation of adjoining public spaces. The proposed layout will:

- Provide an appropriate height along the eastern boundary to address the scale of the Irish Sea;
- Provide a gradual transition in height and scale to the neighbouring Phase 1 development to the west while ensuring an appropriate height to width ratio to address the public realm;
- Address currently underutilised amenity areas including Croke Abbey Valley Park to the north and the coastal pedestrian/cycle link to the east, and the activation and passive surveillance of these spaces;
- Significantly increase east-west permeability both physically and visually to maximise the use and access to the natural coastal amenity;
- Maximise views to the sea and significantly increase the number of dual aspect units; and
- Improve access to sunlight and daylight while minimising overshadowing (see **Section 5.6** of this Planning Report).

In conclusion, it is submitted that the proposed height, scale, massing and design of the subject proposals have been carefully considered to ensure consistency with all national, regional and local planning policies and guidance documents. The proposed Block A development will complete the northeast section of Phase 1 of the wider Sea Gardens development, as envisaged in the *Sea Gardens Masterplan* and, combined with Phase 2 which is currently under consideration by WCC, and a future revised proposal for Block B, will deliver an inspired urban form that makes the most of this centrally located, infill site and unique coastal setting.

5.5 Visual Impact

Given the scale of the proposed development, its coastal location, and having regard for the planning history of the subject site, the potential visual impact of the subject proposals has been a key focus of the design team and a topic that has been discussed with the planning authority during pre-application consultations.

The DLRCDP sets out objectives that aim to protect the County's high-amenity landscapes and views and requires proposed developments to demonstrate consideration of such views and prospects. In this regard, Policy Objective GIB6: Views and Prospects states that:

"It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects".

Furthermore, DLRCDP's Building Height Strategy and the Building Height Guidelines, as referenced in **Section 5.4** of this Planning Report, both note the importance of protecting visual amenity and ensuring that taller buildings are appropriate given their context and setting. In this regard, we would highlight that the proposed development has been informed by the *Sea Gardens Masterplan* and designed with careful consideration for its coastal setting, and for potential impacts on neighbouring areas and proposed future developments.

As described in **Section 5.4** of this Planning Report, a revised design approach is proposed for the coastal portion of the overall Sea Gardens development. This approach will provide a series parallel taller buildings configured in an east-west direction, perpendicular to the coast, with building heights gradually increasing

Planning Report & Statement of Consistency with Planning Policy

towards the sea and towards the southern portion of the overall Sea Gardens development (see **Figures 5-5** and **5-6**).

This configuration, which is reflected in the current proposals for Block A, will be replicated in a future revised planning application to WCC for Block B - ensuring continuity in terms of the architectural language along the eastern edge of the overall Sea Gardens development. This revised approach will improve connectivity and visual permeability to the Irish Sea while maintaining a strong edge and architectural language that addresses the coastal setting of this portion of the overall landholding. It is considered that the proposal, in combination with future proposals for Block B, will have a positive visual impact on this setting and will contribute significantly to enhancing the character of the area.

Further details in relation to the proposed design are set out in the *Architectural Design Statement* prepared by Howells, with several CGIs illustrating the development within its coastal context. As required by DLRCC's LRD Opinion, a complete set of contiguous elevations and long sections have also been prepared and submitted as part of the LRD application documentation.

Also enclosed is a LVIA prepared by Model Works which assesses the visual impact with reference to verified winter and summer views. The LVIA includes 15 no. viewpoints, the locations of which have been informed by previous planning applications at the subject site, and with consideration for views that were highlighted by ABP's Inspector as being particularly relevant in the previous refusal of permission for development at Block A and B under ABP Ref-311181-21.

The LVIA considers the subject proposals in the context of the permitted Phase 1 development, as well as with the proposed Phase 2 development. For selected key views, the LVIA also considers the proposals in the context of indicative future proposals for Block B.

The LVIA notes that:

"In summary, the site has no sensitive landscape or visual receptors in any direction in its immediate environs, and the surrounding landscape provides favourable context for taller development. The site is well buffered – by separation distance, vegetation (Corke Abbey Valley Park) and other similar development (Sea Gardens Phases 1A and 2) – from any sensitive receptors such as existing housing. There are few views from the existing public realm in which the proposed development could be seen from close-up.

These favourable landscape conditions coupled with the site's access to retail and services, schools, employment, the town centre, public transport and open space translate into opportunity for achieving density through building height.

Furthermore, at the macro level, the combination of the Bray's development history and its natural topographical features have resulted in a townscape of diverse character and appreciable strength of character. Although of relatively compact form, Bray has the feel of a larger town or even a small city. This gives it capacity to accommodate change without loss of existing character".

The LVIA concludes that:

"The assessment found that the proposal would cause no significant negative landscape or visual impacts. Overall, the proposal represents a considered response to the site's local and wider landscape contexts".

Having regard for the findings of the LVIA and for the accompanying contiguous elevations and sections prepared by Howells, as well as the *Architectural Design Statement* and associated CGIs, it is considered that the proposed development is entirely appropriate for the subject site and will be further complemented with the future Block B development and other phases of development of the wider Sea Gardens area.

5.6 Daylight, Sunlight and Overshadowing

Having regard for the proposed building heights, and the site's urban context and relationship with neighbouring and future developments, the potential impact on daylight and sunlight, as well as potential overshadowing, was carefully considered throughout the design process. A *Daylight and Sunlight Assessment Report* has been prepared by 3DDB and is submitted as part of the LRD planning application. The report provides details of the assessment undertaken, along with an accompanying shadow study. The assessment considers the impacts in the context of the existing site and neighbouring development to the

Planning Report & Statement of Consistency with Planning Policy

east (as permitted under ABP-311181-21 and currently under construction), and considers the following 2 no. scenarios:

1. The potential impact of the proposals with Block B, as permitted under ABP-314686-22; and
2. The potential impact with the indicative revised layout of Block B, which will be subject of a future planning application to WCC.

The assessment also includes a comparison between Block A as currently proposed, with Block A as previously granted under ABP-314686-22.

In summary, the assessment concludes that:

- In relation to impacts on the permitted Phase 1 duplex units located to the immediate east of the subject site, the assessment states that *“the VSC [Vertical Sky Component] impact on all assessed neighbouring duplexes is considered negligible, which is a positive outcome”*.
- While the assessment notes that Block A as permitted under ABP-314686-22, as well as Block A as currently proposed, will both result in adverse VSC impacts on Block B as permitted under ABP-314686-22, the assessment notes that *“the No-Sky Line (NSL) results are more favourable overall, showing 12 more rooms with a “negligible” classification compared to the VSC results”*.
- Within Block A as proposed, there are high Spatial Daylight Autonomy (SDA) compliance rates and favourable Sunlight Exposure (SE) outcomes. In this regard, the assessment concludes that: *“The SDA results demonstrate very good compliance across all metrics. In the Spatial Daylight Autonomy (SDA) assessment, only 32 of 499 fall below the recommended minimum threshold with even better results when the trees are not considered. For those units falling below the recommended SDA, the project architect has provided compensatory design solutions. In terms of Sunlight Exposure (SE), the development achieves an 81% compliance rate. In the opinion of 3DDB, this represents a favourable outcome considering the scale of the proposed development, the overall masterplan, and the orientation of the blocks and their units”*.
- The assessment also notes favourable impacts on the proposed public and communal open spaces, stating that *“SOG study confirms that all assessed external areas including the Communal Open Space and two Public Open Spaces, receive sunlight levels that meet or exceed compliance standards”*.
- The assessment concludes that *“taking into consideration the overall planning and development objectives, that the scheme is performing favourably from a daylight and sunlight perspective”*.

Having regard for the above, it is submitted that the proposed development will result in an overall positive impact on existing, permitted and future neighbouring developments and, internally, will ensure a high standard of private and communal residential amenity.

5.7 Access, Connectivity and Traffic

The DLRCDP sets out several policies and objectives which relate to access, connectivity and traffic. Given the proposed development’s scale and inclusion within the wider Sea Gardens development, the safe and efficient movement of pedestrian, bicycle, and vehicular traffic has been an important factor in the design of both the masterplan and the proposed Block A development. As noted in **Section 2** of this Planning Report, the subject site is located within an existing urban area and is located c. 800m north of the Bray Daly Railway Station and will benefit from plans to upgrade train services through the DART+ Coastal South project. The site is also within c. 550m of the recently permitted BusConnects ‘Bray – City Centre Core Bus Corridor’, alongside existing bus services. Furthermore, the subject site is adjacent to the planned LUAS Green line extension, with the proposed public transport bridge in the southern portion of the wider Sea Gardens site having recently been allocated funding under the URDF. While the subject proposals are not dependent on the future BusConnects improvements and extension to the LUAS, it will further benefit from these developments and supports the investment into this planned public infrastructure.

As detailed in the *Architectural Design Statement* prepared by Howells, the proposed development has been designed with regard for the *Sea Gardens Masterplan* which provides a framework for the delivery of a network of roads, cycleways and footpaths to ensure permeable connections into the existing fabric of Bray and create new, highly accessible and legible links to Bray Daly Railway Station to the south, and existing bus stops located to the west.

Planning Report & Statement of Consistency with Planning Policy

The proposed development has been designed to integrate into the street network permitted under ABP-311181-21, with a focus on prioritising pedestrian and bicycle routes through green spaces. This network of streets, footpaths and cycleways is currently under construction with all key linkages completed, or nearing completion. As detailed in **Section 5.8** of this Planning Report, car parking is proposed below the maximum standards set out in the DLRCDP to encourage a modal shift to more sustainable modes of travel.

The *Traffic Impact Assessment* and *Mobility Management Plan* prepared by Atkins and submitted as part of this LRD planning application provide further details in relation to access, connectivity and traffic.

Having regard for the above, it is submitted that the proposed development is in fully accordance with the objectives of the DLRCDP as they relate to access, connectivity and traffic. This is confirmed further in **Section 7.4.1** of this report.

5.8 Car Parking

It is highlighted that the previously permitted development at Block A (under ABP-314686-22) was designed to accommodate Build-to-Rent apartment units and therefore included a reduced quantum of car parking as appropriate for the anticipated needs of future residents. However, as noted in **Section 3.3** of this Planning Report, the Applicant no longer intends to provide Build-to-Rent units at this location and the subject proposals have therefore been designed to provide for the needs of permanent residents - including increased levels of residential amenity and the provision of a quantum of parking that reflects the anticipated requirements of prospective 'forever home' buyers.

Notwithstanding the above, and as highlighted in Section 8 of the *Traffic Impact Assessment* prepared by Atkins, the proposed quantum of parking is significantly below the maximum standards set out in the Compact Settlements Guidelines, having due regard for the subject site's accessible location and proximity to existing public transport links, and in line with all relevant national policy and guidelines and the DLRCDP.

The DLRCDP (Section 12.4.5) sets out standards for the maximum provision of car parking spaces in new developments and includes 4 no. 'Parking Zones'. Different maximum standards are set for each of these zones based on factors such as site location and proximity to public transport. **Figure 5-7** provides an extract from the DLRCDP which sets out the maximum parking requirements for these zones.

Land Use		Zone 1 MTC Areas and Blackrock	Zone 2 Near Public Transport	Zone 3 Remainder of County (non-rural)	Zone 4 Rural
Houses:	Criterion	Maximum	Standard	Standard	Standard
House 1 bed	unit	1	1	1	Case by case
House 2 bed	unit	1	1	1	Case by case
House 3 bed or more	unit	1	2	2	Case by case
Apartments and Sheltered Housing:					
Apt 1 bed	unit	1	1	1*	Case by Case
Apt 2 bed	unit	1	1	1*	Case by Case
Apt 3 bed +	unit	1	2	2*	Case by Case

Figure 5-7: DLRCDP Car Parking Standards

Source: *Dún Laoghaire Rathdown County Development Plan 2022 – 2028*

The subject site falls within Zone 2⁵ which is considered to have “good access to existing or planned public transport and active travel provisions”. Having regard for **Figure 5-7**, the maximum permitted provision of car parking spaces for the proposed development equates to 212 no. spaces. This figure is calculated as follows:

⁵ As established in previous planning applications for the subject site under ABP-311181-21 and ABP-314686-22

Planning Report & Statement of Consistency with Planning Policy

- 1 no. car parking space per 106 no. 1 and 2 bedroom units (apartments) = 106 no. spaces maximum
- 2 no. car parking spaces per 53 no. 3+ bed units (including proposed townhouses) = 106 spaces maximum

As outlined in **Section 4.5.1** of this Planning Report, a total of 171 no. car parking spaces are proposed, with 166 no. spaces located in Block A's shared 2-level podium and 5 no. spaces located in the western townhouse garages. The parking provision within the 2-level podium will include 9 no. accessible parking spaces. The proposed provision is therefore comfortably below the maximum standards as set out in the DLRCDP.

The proposed quantum of parking is also in accordance with SPPR 3 of the Compact Settlements Guidelines which set a standard of 1.5 car parking spaces per residential unit for developments in 'accessible locations'. In this regard, for the proposed 159 no. residential units, a maximum provision of 239 no. spaces is permitted under the guidelines. The proposed provision is therefore comfortably below the maximum standards as set out in the Compact Settlements Guidelines.

Car parking will be provided within the shared 2-level podium, with private garages provided within the curtilage of the townhouses located on the west side of Block A. The design of these spaces accords with the *Design Recommendations for Multi-Storey and Underground Car Parks* (4th edition) published by the Institute of Structural Engineers. Entrance widths, ramp levels including transition areas, bay lengths and widths, and aisle and circulation widths all comply with the above guidance. Swept path drawings have been prepared by Atkins to illustrate how the proposed parking layout and design accords with best practice guidance.

Further details and justification regarding car parking space provision are set out in **Section 7.2.3** of this Planning Report, the *Traffic Impact Assessment* prepared by Atkins and the *Architectural Design Statement* by Howells and enclosed as part of this LRD planning application.

5.9 Bicycle Parking

The proposed bicycle parking facilities have been designed to meet the quantitative requirements set out in SPPR 4 of the Compact Settlements Guidelines. It is highlighted that these requirements supersede DLRC's previous requirements set out in the 2018 guidance document - *Standards for Cycle Parking & associated Cycling Facilities for New Developments*⁶.

SPPR 4 of the Compact Settlements Guidelines requires the provision of:

- 1 no. cycle storage space per bedroom; and
- 1 no. visitor cycle parking space per 5 no. residential units.

This equates to a required provision of 332 no. long stay cycle storage spaces and 33 no. visitor cycle parking spaces, totalling 365 no. required spaces.

In accordance with these requirements, a total of 365 no. dedicated cycle spaces are proposed as follows:

- 174 no. long stay spaces in Sheffield-type stands;
- 158 no. long stay spaces in a double-stacked arrangement; and
- 33 no. short stay (visitor) spaces in Sheffield-type stands.

It is highlighted that the quantum of spaces provided in Sheffield-type stands comfortably exceeds the requirements set out in the DLRCDP which state that at least 1 no. Sheffield-type stand space is required per residential unit. In this regard, the DLRCDP requires a minimum of 159 no. Sheffield-type stand spaces while the proposed development provides 207 no. Sheffield-type stand spaces.

The proposed bicycle parking provision has been designed with careful consideration for the qualitative requirements set out in Section 12.4.6 of the DLRCDP which states that new residential developments of 5 units or more will be assessed according to the following criteria:

⁶ Notwithstanding this, the proposed quantum of bicycle parking comfortably exceeds DLRC's previous requirements.

Planning Report & Statement of Consistency with Planning Policy

- “Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of oversized formats (cargo bikes etc)?
- Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?
- Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?
- Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?
- Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?”

Further qualitative standards are referred to in the Compact Settlements Guidelines which state that:

“Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities at planning application stage. The cycle storage facilities should be easily accessible. Unnecessarily long access routes with poor passive security or slopes that can become hazardous in winter weather should be avoided. An acceptable quality of cycle storage requires a management plan that ensures the effective security (including any proposals for electronic access or CCTV), operation and maintenance of cycle parking. It should be low maintenance and as far as possible easy and attractive to use by residents”.

In accordance with the above, the proposed cycle parking spaces have been carefully designed and located to provide convenient access and secure facilities that are connected to the proposed cycle network. 3 no. bicycle stores will be provided within Block A for long stay spaces. 2 no. of these stores will be located on the western side of the building and directly accessed via the Green Spine. These 2 no. stores will include single stacking Sheffield-type stands, providing a total of 174 no. spaces. The remaining 158 no. long stay spaces will be accessed from the eastern green space and will be in the form of a double-stack arrangement, providing a total of 332 no. spaces within the Block A podium car park.

33 no. visitor spaces in single-stacked Sheffield-type stands will also be provided at surface level within the public realm around the building. The proposed bicycle stores are all located in close proximity to the main entrances to Block A and are directly accessible from proposed cycle routes that will connect to the existing and proposed cycle network. Each townhouse will also have space for the safe and convenient storage of multiple bikes within their curtilage.

As required under Section 12.4.6.1 of the DLRCDP, new developments of 5 no. residential units or more require the preparation of a Cycle Audit. In this regard, we can confirm that such an audit has been undertaken and responds to the cycle audit questions outlined in in section 12.4.6.2 Cycle Parking Assessment Criteria of the DLRCDP. This audit is enclosed within the *Traffic Impact Assessment* submitted as part of the LRD planning application.

Having regard for the above, it is submitted that the proposed bicycle parking and associated infrastructure satisfy the qualitative and quantitative requirements set out in the Compact Settlements Guidelines and the DLRCDP. Further details regarding proposed bicycle parking and bicycle infrastructure are set out in the *Architectural Design Statement* by Howells and the *Traffic Impact Assessment* by Atkins and enclosed as part of this LRD planning application.

5.10 Open Space

5.10.1 Public Open Space

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

In this regard, it is noted that the subject site includes 2 no. zoning objectives, including land zoned for the provision of residential development (Objective A) and land zoned for open space and ancillary active recreational amenities (Objective F) (see **Section 5.2** of this Planning Report). Within the portion of the site zoned for residential development, a total of c. 4,078.9sq. m of open space is proposed to serve Block A. This provision equates to 36% of the residential zoned land and therefore comfortably meets the minimum requirement set out in the DLRCDP. It is highlighted that this public open space provision is in addition to c.

Planning Report & Statement of Consistency with Planning Policy

3,718.44sq. m of open space that will be provided on the Objective F zoned lands that wrap around the north and east of Block A.

The proposed public open space has been designed to include pedestrian and cyclist connections to adjoining lands, including links and interfaces with the adjoining Shoreside Park development (permitted under ABP-311181-21), a link to Corke Abbey Valley Park, and access to future development to the south of the application site.

As set out in **Section 4.3** of this Planning Report, the landscape design approach for the subject site seeks to create a high-quality setting for the proposed development which reflects its prominent location on the seafront while maintaining the open character of the former golf course. This will be achieved through the creation of a series of meaningful public spaces with varying uses for residents and visitors. These spaces will be connected by pedestrian and bicycle links that will permeate through the subject site and open new connections to neighbouring areas. Play areas for a range of age groups will be provided throughout the development, with high quality play equipment, seating and other street furniture.

Further details in relation to the proposed public open space are provided in the *Landscape Report* by BSLA and the *Architectural Design Statement* by Howells and submitted as part of the LRD planning application.

Having regard for the above, it is submitted that the proposed public open space is fully consistent with the objectives of the DLRCDP.

5.10.2 Communal Open Space

Section 12.8.3.2 of the DLRCDP sets out minimum requirements for the provision of communal space in new residential developments. The total requirement for the subject proposals is calculated in **Table 5-1**.

Table 5-1: DLRCDP Communal Open Space Requirements

Unit Type	Communal Open Space Standard (sq. m)	No. of Units	Communal Open Space Requirement (sq. m)
Studio	4	0	0
One bed	5	48	240
Two bedrooms (3 person)	6	0	0
Two bedrooms (4 person)	7	58	406
Three bedrooms	9	44	396
Four + bedrooms	12	9	108
Total		159	1,150

As described in **Section 4.3** of this Planning Report, the proposed communal open space will be provided within the central podium courtyard and will include seating areas and play spaces for residents. The total communal open space proposed amounts to c. 1,692sq. m, well in excess of the 1,150sq. m minimum requirement.

Further details in relation to the proposed communal open space are provided in the *Landscape Report* by BSLA and the *Architectural Design Statement* by Howells and submitted as part of this LRD planning application.

Having regard for the above, it is submitted that the proposed communal open space is fully consistent with the objectives of the DLRCDP.

5.10.3 Private Open Space

Section 12.8.3.3 of the DLRCDP sets out minimum requirements for the provision of private space in new residential developments. These standards are summarised in **Table 5-2**.

Planning Report & Statement of Consistency with Planning Policy

Table 5-2: DLRCDP Private Open Space Requirements

Type	Private Open Space Requirement (sq. m)
Houses	
1 – 2 bedroom	48
3 bedroom	60
4 bedroom (or more)	75
Apartments	
Studio	4
One	5
Two (3 persons)	6
Two (4 persons)	7
Three	9
Four +	12

As described in **Section 4.3.3** of this Planning Report, private open space will be provided in the form of balconies and terraces. Individual sizes and designs of these spaces will vary throughout Block A, however each unit will feature private open space that meets or exceeds the DLRCDP's minimum requirements.

A schedule of proposed private open spaces is set out in the *Housing Quality Assessment* prepared by Howells and illustrates compliance with the DLRCDP's minimum requirements.

5.11 Childcare Facility

As detailed in **Section 3.1** of this Planning Report, a split decision was issued by ABP in relation to the previous SHD application encompassing the subject site under ABP-311181-21. The decision granted permission for the western portion of Phase 1 only, comprising of *inter alia* 106 no. apartments, 52 no. duplexes, 76 no. houses, a café, commercial units, and a childcare facility in Block C to serve the entire Phase 1 development (including the apartments at Blocks A and B which were refused as part of ABP's split decision).

The Applicant is currently progressing with the construction of the permitted western portion of Phase 1 - including the childcare facility. While the subject proposals for Block A will introduce a revised residential mix, it is submitted that the permitted childcare facility will have more than sufficient capacity to cater for the updated proposals.

Further to DLRC's LRD Opinion issued on 7th May 2025, a *Childcare Facility Capacity Assessment* has been prepared by RPS and is enclosed as part of the LRD planning application to illustrate the capacity of the permitted childcare facility and its ability to cater for the needs of the subject proposals.

The *Childcare Facility Capacity Assessment* provides an analysis of the projected childcare demand in the context of projected population demographics, including prevailing household sizes in the surrounding area, and with consideration for relevant guidelines, policies and objectives that relate to the proposed scheme. It concludes that the childcare facility at Block C, as permitted under ABP-311181-21 and now nearing completion, has more than sufficient capacity to cater for the demand arising from the subject development.

6 ENVIRONMENTAL APPRAISALS

6.1 Environmental Impact Assessment Screening

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

The proposal has been screened out of a full EIAR by reference to the Planning Act and the Planning Regulations. An *EIA Screening Report* prepared by Atkins is enclosed with this application and provides details on the EIA screening process undertaken in relation to the proposed Block A development.

6.2 Appropriate Assessment Screening

An *Appropriate Assessment Screening Report* has been prepared by Atkins and is enclosed as part of this application. The report seeks to establish whether the proposed development is likely to have a significant effect on any designated European Site under European Council Directives 92/43/EEC and 2009/147/EC.

The report concludes that the proposed development is unlikely to have a significant effect on any designated European Sites and therefore a Stage 2 AA is not required.

7 STATEMENT OF CONSISTENCY WITH PLANNING POLICY

7.1 Introduction

In accordance with section 32D of the Planning Act and article 22 (2A) of the Planning Regulations, the following subsections illustrate how the proposed development will be consistent with the policies and objectives set out in national, regional and local planning policy documents and guidelines.

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

- National:
 - *Project Ireland 2040 – Final Draft Revised National Planning Framework (2025)*
 - *Housing for All - A New Housing Plan for Ireland (2021)*
 - *Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)*
 - *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*
 - *Urban Development and Building Heights (2019)*
 - *Childcare Facilities – Guidelines for Planning Authorities (2001)*
 - *Design Manual for Urban Roads and Streets (2013)*
 - *The Planning System and Flood Risk Management (2009)*
- Regional
 - *Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly 2019–2031*
 - *Greater Dublin Area Transport Strategy 2022-2042*
 - *Greater Dublin Area Cycle Network Plan (2022)*
- Local
 - *Dún Laoghaire-Rathdown County Development Plan 2022-2028*
 - *Bray and Environs Transport Study (2019)*

7.2 National Level

7.2.1 Project Ireland 2040: National Planning Framework (Revised 2025)

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

The *National Planning Framework: First Revision* was approved by both houses of the Oireachtas in April 2025 and subsequently published. The references and objectives quoted in this Planning Report correspond to those used in the First Revision.

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

National Policy Objective 43 of the NPF states that it is a national policy to "*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision*

Planning Report & Statement of Consistency with Planning Policy

relative to location". The NPF expands on this objective, explaining that the future homes of Ireland will be built in locations that support sustainable development such as cities and larger towns with provision of infrastructure, access to services and can be delivered in an efficient and appropriate way.

National Policy Objective 12 of the NPF aims to “ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”.

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

Table 7-1: NPF Consistency Appraisal

National Planning Framework		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Objective 3	<i>“Additional 470,000 people in Eastern and Midland Region by 2040.”</i>	The proposed development comprises 159 no. residential units providing new homes to enable population growth in the Eastern and Midland Region.
Objective 4	<i>“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”</i>	The proposed development comprising 159 no. residential units is located within the Dublin Metropolitan Area.
Objective 8	<i>“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.”</i>	The proposed development comprising 159 no. residential units is located within the existing built-up area of Bray and also forms part of the wider Dublin Metropolitan Area.
Objective 10	<i>“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.”</i>	The proposed development is located within an existing large town which is served by existing (DART, Commuter Rail, Intercity Rail, and Dublin-Bray Bus Corridor) high-capacity public transport. It will also benefit from permitted (BusConnects) and planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South). The mix of house types and unit sizes proposed provides for the compact and sustainable growth of Bray.
Objective 12	<i>“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”</i>	The proposed development is located within the urban fabric of Bray and enjoys multiple vehicular, pedestrian and cycle connections with the town. The quality of design is detailed in the <i>Architectural Design Statement</i> prepared by Howells which demonstrates how the proposed development will merge respectfully with the existing built form of Bray town with a comparable scale and urban grain.
Objective 13	<i>“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”</i>	The proposed development will cater for the anticipated growth of Bray, a town with a population of 33,512 in 2022 ⁷ , and will support investment in this town and the wider urban area. The proposed development enhances the attractiveness of Bray as a place to live and for inward investment.
Objective 20	<i>“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</i>	The proposed development will provide 159 no. residential units within an existing large town which is designated a “key town” in the <i>Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly 2019 – 2031</i> . The development will encourage more people and investment in the area to achieve the targeted growth of Bray.

⁷ Source: Census 2022, [Interactive Data Visualisations | CSO Ireland](#)

Planning Report & Statement of Consistency with Planning Policy

National Planning Framework		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
	<i>appropriate planning standards and achieving targeted growth.”</i>	
Objective 37	<i>“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.”</i>	The subject site is located within Bray town. All the facilities of the town may be accessed on foot or by bicycle from the subject site. High-capacity public transport services at Bray Daly railway station are within c. 800m of the site. Pedestrian/ cycle routes are being provided within the site and will facilitate linkages to Corke Abbey Valley Park, the waterfront and the town as part of the proposed development. The proposed layout has been informed by the planned LUAS Green line extension and the public transport bridge which lie adjacent and south of the subject site. Further details of the proposed development’s support of sustainable transport and active travel are set out in the Traffic Impact Assessment and <i>Mobility Management Plan</i> prepared by Atkins and submitted with this application. Section 4.5.3 of this Report provides information regarding the proposed provision of resident and visitor cycle parking facilities in Block A.
Objective 41	<i>“Prioritise the alignment of targeted and planned population and employment growth with investment in: The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities.”</i>	The subject site is located within the built-up area of Bray and represents an infill development in close proximity to all services and facilities associated with a large town. A childcare facility providing a total of 88 no. spaces was previously permitted as part of the wider development under ABP-311181-21. This facility is located in Block C to the southwest of the Block A application site and is currently in operation. A <i>Childcare Facility Capacity Assessment</i> has been prepared by RPS and is submitted as part of the LRD application. The assessment confirms that an adequate quantum of childcare spaces is available to accommodate the Sea Gardens Phase 1 development, including the proposed Block A.
Objective 43	<i>“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”</i>	The <i>Sea Gardens Masterplan</i> , prepared by Howells and submitted as part of the LRD application, provides an overarching plan for the area to ensure that the proposed development integrates seamlessly within the existing settlement and supports, and is supported by, existing local facilities and transport connections. The proposed development is located within an existing large town which is served by existing planned high-capacity public transport (DART, Commuter Rail, Intercity Rail, and Dublin-Bray Bus Corridor). It will also benefit from the permitted BusConnects scheme and planned LUAS Green Line extension and DART+ Coastal South project. The proposed development is also well located with respect to pedestrian and cycle access. Linkages to the movement network and the surrounding area are provided as part of the proposed site layout. The mix of house types and unit sizes proposed provides for the sustainable growth of Bray. Section 5.3 of this Report and Section 4.5 of the <i>Architectural Design Statement</i> prepared by Howells provide a detailed justification for the proposed density of Block A.
Objective 45	<i>“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development</i>	The proposed development will provide increased density and building height and ensure a compact form of development on an infill site located within the built-up area of Bray and within c. 800m of the Bray Daly railway station.

Planning Report & Statement of Consistency with Planning Policy

National Planning Framework		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
	<i>schemes, area or site-based regeneration, increased building height and more compact forms of development.”</i>	Sections 5.3 and 5.4 of this Report provide detailed justifications for the proposed density and building heights of Block A. Further justification is provided in Section 4.5 of the <i>Architectural Design Statement</i> prepared by Howells and enclosed with the application.

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

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

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

Housing for All is set around four “pathways”:

1. Supporting Homeownership and Increasing Affordability;
2. Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
3. Increasing New Housing Supply; and
4. Addressing Vacancy and Efficient Use of Existing Stock.

These four pathways are in turn supported by the following objectives of the plan:

- Enabling a Sustainable Housing System; and
- Establish a Commission on Housing.

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

Table 7-2: Housing for All - Consistency Appraisal

Housing for All		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Pathway to Increasing New Housing Supply	<i>“Increased supply of new housing, up to an average of at least 33,000 per year to 2030.”</i>	The proposed development consists of the provision of 159 no. residential units, thereby increasing new housing supply in line with the Housing for All policy.
Increase Social Housing Delivery 4.1	<i>“Deliver over 10,000 social housing homes each year to 2030 and increase the stock of available social housing.”</i>	In accordance with Section 96 of the Planning Act, a total of 16 no. units (10% of the total number of units proposed) will be transferred to the planning authority for social and affordable housing. 14 no. of these units are located outside of the planning application boundary and have been constructed as permitted under ABP–311181-21. The remaining 2 no. units are located within the proposed Block A1. Further details of the proposed Part V provision are provided in Section 4.9 of this Report and Section 4.13 of the <i>Architectural Design Statement</i> prepared by Howells.
Drive environmental sustainability in our housing stock 21.1	<i>“Continue a joint approach in respect of the Design Manual for Urban Roads and Streets (DMURS), to ensure more widespread and consistent implementation.”</i>	The proposed development has been designed in accordance with the DMURS. Atkins have undertaken a separate appraisal of the proposed development and its conformity with the DMURS which is enclosed as part of the <i>Traffic Impact Assessment</i> submitted with the LRD application.
Drive environmental sustainability in our housing stock 21.5	<i>“Construct an average of 33,000 NZEB homes each year to 2030.”</i>	All buildings proposed as part of the Block A development will be constructed to achieve NZEB standards. Further details on how NZEB standards will be achieved are provided in the <i>Climate Action and Energy</i>

7.2.3 Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)

The Department of Housing, Planning and Local Government published the *Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities* (Compact Settlements Guidelines) in January 2024. The guidelines replace the *Sustainable Residential Developments in Urban Areas - Guidelines for Planning Authorities* which were originally published in 2009.

The guidelines expand on higher-level policies of the NPF, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

The guidelines also set out 4 no. Specific Planning Policy Requirements (SPPR), of which planning authorities shall apply in the performance of their functions. These SPPRs relate to the provision of minimum separation distances (SPPR1), minimum private open spaces (SPPR2), maximum car parking provision (SPPR3), and minimum bicycle storage provision (SPPR4). In this regard, the proposed development will be fully in accordance with these SPPRs and other standards of the guidelines, as described in this section and elsewhere in this Planning Report as well as in the *Architectural Design Statement* prepared by Howells and the *Traffic & Transport Assessment* prepared by Atkins.

We note that the DLRCDP was adopted in April 2022 and therefore does not consider the Compact Settlements Guidelines or its SPPRs. Therefore, the proposed development's compliance with the guidelines is assessed independently in the following sections.

7.2.3.1 Density

Section 3.3. of the Compact Settlements Guidelines set out density ranges for different settlements and area types. It is considered that the subject site falls under the definition of “*Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods*” as per Table 3.3 of the guidelines. Such areas are described as follows:

*“The centre and urban neighbourhoods category includes: (i) the town centre and immediately surrounding neighbourhoods, (ii) strategic and sustainable development locations, and (iii) lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8). It is a policy and objective of these Guidelines that **residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns**” (RPS emphasis in bold).*

In line with this density range, the proposed Block A development will deliver a gross density of 115uph, and a net density of 134uph, and will therefore be in accordance with the density range set out above.

The proposed density in the context of the wider Sea Gardens development is addressed **Section 5.3.2** of this Planning Report, with further details set out in the *Sea Gardens Masterplan* prepared by Howells and submitted as part of the LRD application.

Having regard for the above, it is considered that the proposed development's density is fully in accordance with the Compact Settlement Guidelines.

7.2.3.2 Key Indicators of Quality Design and Placemaking

Section 4.4 of the Compact Settlements Guidelines set out a number of ‘Key Indicators of Quality Design and Placemaking’ that informs the development of settlements, neighbourhoods and individual sites. The proposed development's compliance with these key indicators is discussed in the sections below, with a more detailed analysis provided in Section 6.1 of the *Architectural Design Statement* prepared by Howells and enclosed as part of this LRD planning application.

7.2.3.3 Sustainable and Efficient Movement

Under the heading ‘Sustainable and Efficient Movement’, Section 3.3 of the Compact Settlements Guidelines require that proposals must established a permeability and legible network of streets and spaces and improve connections to established communities through the provision of streets and public spaces that are designed in accordance with DMURS. It also notes that the quantum of parking should be minimised (in accordance with SPPR4), with more sustainable modes of transport facilitated to ensure public realm is not dominated by parked vehicles.

In this regard, and as detailed in the *Architectural Design Statement* prepared by Howells, the proposed development has been designed with regard to the *Sea Gardens Masterplan* which provides a framework for the delivery of a network of roads, cycleways and footpaths to ensure permeable connections into the existing fabric of Bray and create new, highly accessible and legible links. The proposed development has been designed to integrate into the street network permitted under ABP-311181-21, with a focus on prioritising pedestrian and cycle routes through green spaces.

In line with Section 3.3 and SPPR4 of the Compact Settlements Guidelines, and with national and regional planning policy, the proposed car parking has been minimised, with an emphasis placed on facilitating active travel through the provision of footpaths and cycleways, and ample bicycle parking in line with minimum requirements. A bicycle repair area is also provided to further encourage and support this sustainable mode of travel.

Further details in relation to the proposed car parking and active travel measures are set out in the *Traffic Impact Assessment* prepared by Atkins and submitted as part of this LRD application. The Assessment also includes full details of the subject proposal’s compliance with the *Design Manual for Urban Roads and Streets* (2019).

7.2.3.4 Mix and Distribution of Uses

Under the heading ‘Mix and Distribution of Uses’, Section 3.3 of the Compact Settlements Guidelines note that the mix and intensity of land uses must be appropriate to the site and its location and optimise access to public transport, amenities and local services. It states that proposals must support the revitalisation of existing neighbourhoods and provide enhanced public realm to create more liveable environments that attract investment and encourage a greater number of visitors to the area.

In this regard, and as detailed in the *Architectural Design Statement* prepared by Howells, the proposed development has been designed with regard to the *Sea Gardens Masterplan* which provides a framework for the development of the wider area, ensuring a balanced mix of uses including residential, commercial, retail and community facilities, and providing a permeable network of streets, cycleways and footpaths that connect to existing public transport services and the wider fabric of Bray. The proposed Block A development will be fully integrated into the development to the west of the subject site (permitted under ABP-311181-21) and will avail of the childcare facility that is currently being completed as part of this development. Future planning applications will be made for the remainder of the Sea Gardens site to include additional residential, commercial, retail and community facilities.

Block A will deliver a mix of apartments and townhouses to provide a greater variety residential building typologies in the area, complementing the lower density development that is currently being completed to the west of the site (permitted under ABP-311181-21). Block A will also deliver a more balanced mix of apartment sizes than that previously permitted for the subject site (under ABP-314686-22), with fewer 1-bedroom units and more family-sized dwellings in accordance with the DLRCDP’s requirements. Block A will also provide new communal facilities for future residents in the form of, *inter alia*, residents’ lounges, a communal gym and bicycle repair facility. Furthermore, the proposed development will ensure the delivery of substantial areas of areas of public open space, as well as pedestrian and bicycle infrastructure to connect with permitted and future links to the surrounding areas.

Further information in relation to the mix and distribution of uses is set out in the *Architectural Design Statement* prepared by Howells and submitted as part of this LRD planning application.

7.2.3.5 Green and Blue Infrastructure

Under the heading ‘Green and Blue Infrastructure’, Section 3.3 of the Compact Settlements Guidelines note that proposed developments should positively respond to natural features and the character of the landscape

Planning Report & Statement of Consistency with Planning Policy

and include interconnected, universally accessible, open spaces and corridors to conserve ecological links and promote active travel. It notes that public spaces should include nature-based solutions for the management of drainage and to promote biodiversity, urban greening, improved water quality and flood mitigation.

In this regard, and as detailed in the *Architectural Design Statement* prepared by Howells, the proposed development has been designed to facilitate a continuous green space running from Corke Abbey Valley Park down the River Dargle through the provision of the northern section of this space. Pedestrian and bicycle links are proposed to link with permitted and future development in the wider Sea Gardens area to promote active travel and enhance to the coastal setting of the site. Details of proposed landscaping and public open spaces set out in the *Landscape Report* prepared by BSLA and enclosed as part of this LRD planning application.

Throughout the proposals, nature-based SuDS measures have been included to mitigate against flooding and ensure appropriate drainage of surface water. In addition, green roofs are provided, as detailed in the architectural and engineering drawings that accompany this pre-application consultation submission.

Further details in relation to proposed surface water drainage are set out in the *Engineering Report* prepared by Atkins. A *Stage 1 Flood Risk Assessment* has also been prepared and is submitted as part of this application.

7.2.3.6 Responsive Built Form

Under the heading 'Responsive Built Form', Section 3.3 of the Compact Settlements Guidelines note that the layout, orientation and scale of proposed developments should support the formation of a coherent and legible urban structure. Buildings should clearly define public spaces and generate safe, active and animated streets and open space. Development should integrate well within their context and provide appropriate transitions in terms of scale and height to safeguard amenities. Proposals should also deliver distinctive buildings and spaces that compliments the prevailing urban structure and promotes a strong sense of identity and legibility.

In this regard, and as detailed in the *Architectural Design Statement* prepared by Howells and **Section 5.4.1** of this Planning Report, the proposed development has been designed with regard for the *Sea Gardens Masterplan* which provides a framework for the development of the wider area and ensures the delivery of a network of public spaces and connections. These spaces will be enclosed by the surrounding buildings, including the proposed Block A, and will be appropriately overlooked and animated through the provision of active frontages. Taller elements of Block A are located to the west to ensure a gradual transition in scale to the neighbouring development being completed to the west, while providing appropriate height to width ratios to address the scale of adjacent public open spaces. The proposed arrangement will provide passive supervision to existing amenities such as Bray's North Beach to the east, and Corke Abbey Valley Park to the north, providing passive supervision to these amenities and drawing them into the wider urban area.

7.2.3.7 SPPR 1 – Separation Distances

SPPR 1 of the Compact Settlements Guidelines states that:

"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy."

In accordance with SPPR 1, minimum separation distances are achieved throughout the proposal, ensuring privacy and the protection of residential amenity. Further details on separation distances are set out in the

Planning Report & Statement of Consistency with Planning Policy

Architectural Design Statement and suite of drawings prepared by Howells and enclosed as part of the LRD application. A *Daylight and Sunlight Assessment Report* has also been prepared by 3DDB and is enclosed as part of the LRD application. The *Daylight and Sunlight Assessment Report* confirms that the proposed development will result in an overall positive impact on existing, permitted and future neighbouring developments and, internally, will ensure a high standard of private and communal residential amenity. Having regard for the above, it is submitted that the proposed development is fully compliant with SPPR 1 of the Compact Settlements Guidelines.

7.2.3.8 SPPR 2 – Minimum Private Open Space

SPPR 2 of the Compact Settlements Guidelines relates to the minimum required provision of private open space for new houses and states that:

“It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20sq. m
- 2 bed house 30sq. m
- 3 bed house 40sq. m
- 4 bed + house 50sq. m

[...] Apartments and duplex units shall be required to meet the private and semiprivate open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).”

As described in **Section 4.3.3** of this Planning Report, private open space for the 9 no. townhouses will be provided in the form of terraces. Individual sizes and designs of these spaces vary; however, each unit will feature private open space that meets or exceeds the SPPR 2 requirements.

More detailed information regarding individual units’ private open space provision is set out in the *Architectural Design Statement* prepared by Howells and enclosed as part of this LRD application. A schedule of proposed private open spaces illustrating compliance with the guidelines’ minimum requirements is also provided within the *Housing Quality Assessment* also prepared by Howells and enclosed.

With regard for the proposed apartment units, the *Housing Quality Assessment* illustrates how the proposed private balconies and terraces serving each unit has been designed to be fully in accordance with the requirements of the *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)* (see also **Section 7.2.4** of this Planning Report).

Having regard for the above, it is submitted that the proposed provision of private open space for the 9 no. townhouses in Block A is fully compliant with SPPR 2 of the Compact Settlements Guidelines.

7.2.3.9 SPPR 3 – Car Parking

SPPR 3 of the Compact Settlements Guidelines provides standards for the provision of car parking in new residential developments and states that:

“It is a specific planning policy requirement of these Guidelines that:

- (i) *In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) *In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) *In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling*

Planning Report & Statement of Consistency with Planning Policy

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.”

The proposed quantum of car parking is fully in accordance with SPPR 3 of the Compact Settlements Guidelines which sets a maximum standard of 1.5 car parking spaces per residential unit for developments in ‘accessible locations’. In this regard, for the proposed 159 no. residential units, a maximum provision of 239 no. spaces would be permitted under the guidelines. As outlined in **Section 4.5.1** of this Planning Report, a total of 171 no. spaces is proposed. Given the site’s accessible location and proximity to existing public transport, it is considered that this reduced car parking space provision is appropriate and fully compliant with SPPR 3 of the Compact Settlements Guidelines.

Justification regarding car parking space provision is set out in **Section 5.10** of this Planning Report and in the *Traffic Impact Assessment* prepared by Atkins and enclosed as part of this LRD planning application.

7.2.3.10 SPPR 4 – Cycle Parking and Storage

SPPR 4 of the Compact Settlements Guidelines sets out quantitative and qualitative standards in relation to cycle parking and storage, and states that:

“It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) *(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

The subject proposals have been designed to meet the quantitative requirement set out by SPPR4. In this regard, the minimum requirement for the proposed development is 365 no. spaces. This is calculated as follows:

- 1 space x 332 no. bedrooms = 332 no. spaces
- 1 space x (159 units / 5) = 33 no. spaces
- 332 + 33 = 365 no. total spaces

In line with this requirement, 365 no. cycle spaces are proposed. These are provided as follows:

- 174 no. long stay Sheffield-type stands;
- 33 no. short stay (visitor) Sheffield-type stand; and
- 158 no. additional spaces in a double-stacked arrangement.

As noted in **Section 4.5.3** of this Planning Report, the proposed bicycle parking spaces are located and designed with regard for convenience and security. In addition to the 365 no. dedicated cycle spaces, each of the 9 no. townhouses will have ample space to store bikes within their curtilage.

Planning Report & Statement of Consistency with Planning Policy

Having regard for the above, it is submitted that the proposed bicycle parking provision fully complies with SPPR 4 of the Compact Settlement Guidelines. An assessment of proposed bicycle parking provision is detailed in the *Traffic Impact Assessment* by Atkins and enclosed as part of the LRD planning application.

7.2.4 Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)

The Department of Housing, Local Government and Heritage published the updated *Design Standards for Apartments – Guidelines for Planning Authorities* (Apartments Guidelines) in July 2025. The Apartments Guidelines address the need to enhance apartment output to secure both additional housing supply and more compact urban development patterns. Accordingly, the Apartments Guidelines aim to:

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

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

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

- Apartment mix;
- Internal space standards;
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartment to stair / lift ratio;
- Storage spaces;
- Amenity spaces including balconies and patios;
- Car parking; and
- Room dimensions.

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

Table 7-3: Design Standards for Apartments Consistency Appraisal

Apartments Guidelines – SPPRs and Development Management Standards		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Housing Mix (SPPR 1)	<p>a) <i>With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</i></p> <p>b) <i>Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</i></p>	<p>The proposed development includes 150 no. apartments, and the housing mix is consistent with SPPR 1. The unit mix is as follows:</p> <ul style="list-style-type: none"> • 30% 1-bedroom apartment units • 36% 2-bedroom apartment units • 28% 3-bedroom apartment units • 6% 4-bedroom terraced house units <p>Further details of the proposed housing mix are provided in Section 4.2.6 of this Report. Assessment of the proposed housing mix's compliance with the relevant policy is provided in the <i>Housing Quality Assessment</i> prepared by Howells and submitted with this application.</p>

Planning Report & Statement of Consistency with Planning Policy

Apartments Guidelines – SPPRs and Development Management Standards		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Floor Areas (SPPR 2)	<p><i>“The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:</i></p> <ul style="list-style-type: none"> • <i>Studio apartment (1 person) 32sq.m</i> • <i>1-bedroom apartment (2 persons) 45 sq.m</i> • <i>2 bedroom apartment (3 persons) 63 sq.m</i> • <i>2-bedroom apartment (4 persons) 73 sq.m</i> • <i>3-bedroom apartment (4 persons) 76 sq.m</i> • <i>3-bedroom apartment (5 persons) 90 sq.m</i> <p><i>The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.”</i></p>	<p>There are no studio apartments proposed.</p> <p>All apartments meet or exceed the floor area requirement. This is confirmed in the <i>Housing Quality Assessment</i> prepared by Howells enclosed with this application.</p>
Dual Aspect Ratio (SPPR 3)	<p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p>i) <i>A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</i></p> <p><i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i></p>	<p>Aspect and orientation of the apartment units have been designed to maximise the favourable aspects. 100% of the proposed apartment units feature dual aspect. There are no single aspect north facing apartments proposed.</p> <p>Section 5.6 of this Report and the <i>Daylight and Sunlight Assessment Report</i> prepared by 3DDB provide further information regarding access to sunlight and daylight in the proposed Block A.</p>
Floor to Ceiling Heights (SPPR 4)	<p><i>“Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. 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.”</i></p>	<p>Proposed floor to ceiling heights for Block A all meet or exceed 3.15m and therefore surpass the requirements of SPPR 5. Further details are provided in the <i>Housing Quality Assessment</i> prepared by Howells enclosed with this application.</p>
Lift Core (SPPR 5)	<p><i>“There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.”</i></p>	<p>Block A has 10 apartment units per floor per core on a typical level and no core serving any level with 12 or more apartments. Further details are provided in the <i>Housing Quality Assessment</i> prepared by Howells enclosed with this application.</p>
Communal, Community and Cultural Facilities (SPPR 6)	<p><i>“The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.”</i></p>	<p>Blocks A1 and A2 provide high quality residential communal facilities which include lobby spaces, resident lounge area, cinema room, and a gym / fitness centre. In addition, a communal courtyard will be accessible for all residents of Block A, bringing the total provision of communal amenity space to 1,692sq. m.</p> <p>Specific details of proposed communal amenities for Block A are provided in Section 4.2 of this Report, and the suite of architectural drawings and <i>Architectural Design Statement</i> prepared by Howells.</p>
Location	<p><i>“Meeting our targets in relation to compact growth will require a continued focus on the regeneration and redevelopment of brownfield and infill sites, as well realising opportunities for adaptation, reuse and</i></p>	<p>The scale and density of proposed development has been designed with regard for the infill nature of the site within the built-up area of Bray - a large town with a population of 33,512 located</p>

Planning Report & Statement of Consistency with Planning Policy

Apartments Guidelines – SPPRs and Development Management Standards

Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
	<i>intensification of existing buildings. It will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city and town centres and close to public transport nodes and interchanges (including of TOD).</i>	<p>within the Dublin Metropolitan Area. The site is within c. 800m of Bray Daly railway station and within c. 550m of the recently permitted BusConnects Dublin-Bray Bus Corridor. It will also benefit from the planned LUAS Green line extension to Bray and DART+ Coastal South project.</p> <p>Section 5.3 of this Report and Section 4.5 of the <i>Architectural Design Statement</i> prepared by Howells provide a detailed justification for the proposed density of Block A.</p>
Security Considerations	<i>“Apartment design should provide occupants and their visitors with a sense of safety and security, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.”</i>	<p>All streets and landscaped spaces areas benefit from passive surveillance. Particular attention has been paid to the passive supervision of Block A’s landscaped spaces; these areas are for pedestrian and cycle use only and are overlooked by both apartment blocks and both sets of terraced houses.</p> <p>All proposed houses have street frontages with own door access in order to focus activity onto the streets surrounding Block A. Further activity is provided by the ground floor amenity uses at Block A1’s north-west corner, providing passive surveillance at a key pedestrian and cycle route through the <i>Sea Gardens Masterplan</i> area.</p> <p>Entrance points shall be clearly indicated, well lit, and overlooked by adjoining dwellings.</p> <p>Further details regarding the design of Block A’s public realm and access points are provided in the <i>Architectural Design Statement</i> prepared by Howells and the <i>Landscape Report</i> prepared by BSLA and enclosed with this application.</p>
Access and Services	<i>“Apartment schemes should be designed so that they are easy for people to use and to reflect the fact that all people experience changes in their abilities as they progress through the different stages of life.”</i>	<p>Apartments are being designed to be compliant with Part M of the Building Regulations. This is confirmed in the <i>Housing Quality Assessment</i> prepared by Howells.</p>
Communal Facilities	<i>“The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents. In particular, accessible, secure and usable outdoor space is a high priority for families with young children and for less mobile older people.</i>	<p>Blocks A1 and A2 provide high quality residential communal facilities which include lobby spaces, resident lounge area, cinema room, and a gym / fitness centre. In addition, a communal courtyard will be accessible for all residents of Block A, bringing the total provision of communal amenity space to 1,692sq. m.</p> <p>Specific details of proposed communal amenities for Block A are provided in Section 4.2 of this Report, and the suite of architectural drawings and <i>Architectural Design Statement</i> prepared by Howells.</p>

Planning Report & Statement of Consistency with Planning Policy

Apartments Guidelines – SPPRs and Development Management Standards

Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Communal Amenity Space	<ul style="list-style-type: none"> • 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 (4 person): 7 sq.m • Three bedrooms (5 person): 9 sq.m 	<p>Communal open space will be provided within the central podium courtyard and will include seating areas and play spaces for residents. The total communal open space proposed amounts to c. 1,692sq. m, well in excess of the 1,042sq. m minimum requirement as set out by the Guidelines.</p> <p>Further details in relation to the proposed communal open space are provided in Section 4.3.2 and Section 5.10.2 of this Report, the <i>Landscape Report</i> by BSLA and the <i>Architectural Design Statement</i> by Howells and submitted as part of this application.</p>
Childcare	<p><i>“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), which are subject to review, and which recommend the provision of one child care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development, the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms.”</i></p>	<p>A childcare facility providing a total of 88 no. spaces was previously permitted as part of the wider development under ABP-311181-21. This facility is located in Block C to the southwest of the Block A application site and is currently in operation.</p> <p>A <i>Childcare Facility Capacity Assessment</i> has been prepared by RPS and is submitted as part of the LRD application. The assessment confirms that an adequate quantum of childcare spaces is available to accommodate the Sea Gardens Phase 1 development, including the proposed Block A.</p>
Children’s Play	<p><i>“Recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children’s play needs should be catered for:</i></p> <ul style="list-style-type: none"> • <i>Within the private open space associated with individual apartments;</i> • <i>within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and</i> • <i>Within play areas (200- 400 sqm) older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms”</i> 	<p>Proposed private open space within Block A’s apartments accords with the Guidelines and will provide for children’s play needs.</p> <p>c. 343sq. m of dedicated public play areas for children of all ages will be located in the north of the site.</p> <p>These spaces will comprise of 2 no. ‘kickabout’ green areas, intended for informal play, and 2 no. ‘natural play’ areas which will feature non-prescriptive play facilities incorporating natural landscaping elements and encourage social interaction with accompanying adults</p> <p>Further details of proposed play areas are set out in Section 4.3.1 of this Report and the <i>Landscape Report</i> prepared by BSLA and enclosed with this application.</p>
Refuse Storage	<p><i>“Provision shall be made for the storage and collection of waste materials in apartment schemes. Waste storage facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points.”</i></p>	<p>The provision for refuse facilities is detailed in the <i>Outline Operational Waste Management Plan</i> prepared by Atkins and enclosed. A three-bin system for the collection of mixed dry recyclables, mixed non-recyclables and glass shall be provided in each apartment block. Further details with respect to the provision of waste facilities is provided in Section 4.6.2 of this Report and in the <i>Housing Quality Assessment</i> prepared by Howells.</p>

Planning Report & Statement of Consistency with Planning Policy

Apartments Guidelines – SPPRs and Development Management Standards

Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Bicycle Parking and Storage	<p><i>“Accessibility to, and secure storage of, bicycles is a key concern for apartment residents and apartment proposals must respond accordingly to the requirements below in their design and provision of cycle storage facilities. 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.</i></p> <p><i>Requirements for the quantity and design of bicycle parking are set out in Section 5.25 (including SPPR 4) of the SRDCSGs”</i></p>	<p>The proposed provision of bicycle parking for Block A has been based on the standards set out by the Compact Settlements Guidelines and the DLRCDP.</p> <p>A total of 207 no. Sheffield-type stands are proposed, with 33 no. of these dedicated for visitors located at surface-level outside the podium, and the remaining 174 no. designated for residents of Blocks A1 and A2 being located inside the podium.</p> <p>A further 158 no. spaces for residents will be provided in double-stacked arrangements within the podium.</p> <p>In addition to these 365 no. dedicated spaces, each of the 9 no. townhouses will have ample storage space for multiple bikes.</p> <p>Further detail regarding the proposed cycle storage provision and its compliance with relevant policy is set out in Section 4.5.3 and Section 5.9 of this Report and the <i>Traffic Impact Assessment</i> prepared by Atkins.</p>
Car Parking	<p><i>“Having regard to the types of location in cities and towns that may be suitable for apartment development, car parking ratios should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport. Maximum car parking rates are set out in Section 5.25 (SPPR 3) of the SRDCSGs. These rates are graduated based on proximity to centres and accessibility to public transport services.”</i></p>	<p>The proposed provision of car parking for Block A has been informed by SPPR3 of the Compact Settlements Guidelines and the objectives of the DLRCDP.</p> <p>A total of 166 no. parking spaces are proposed within Block A’s shared 2-level podium, of which 9 no. will be accessible spaces.</p> <p>The 5 no. proposed townhouses along the western edge of Block A will include private garages within the curtilage of each dwelling, bringing the overall quantum of parking to 171 no. spaces.</p> <p>Proposed car parking provision and its compliance with relevant policy is set out in greater detail in Section 5.8 of this Report and the <i>Traffic Impact Assessment</i> prepared by Atkins.</p>
Apartments and the Development Management Process	<p>Section 6.0 provides guidance on what is to be included in a planning application for an apartment development:</p> <ul style="list-style-type: none"> • <i>“All applications for planning permission for apartment schemes or mixed housing developments that include apartments, should submit a schedule that details the number and type of apartments and associated individual unit floor areas, as part of the planning application process.</i> • <i>A schedule of apartment accommodation should identify the proposed apartments that are at least 10% greater than the minimum floor area standard in schemes with 10 or more apartments.</i> • <i>Apartment unit schedules should detail proposed private amenity space and internal (and any external) storage space associated with each</i> 	<p>A schedule detailing the number and type of apartments and associated individual unit floor areas and identifying those that provide a floor area 10% greater than the minimum floor area standard is provided in the <i>Housing Quality Assessment</i> prepared by Howells. This schedule also details proposed private amenity space and internal (and any external) storage space associated with each apartment and details the aspect of each apartment.</p> <p>Planning application drawings prepared by Howells include the principal dimensions of each room as well as the aggregate floor area of each room.</p>

Planning Report & Statement of Consistency with Planning Policy

Apartments Guidelines – SPPRs and Development Management Standards

Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
	<p><i>apartment. The schedule should also detail the aspect of each apartment, i.e. whether dual or single. In the case of single aspect apartments, the schedule should specify the orientation.</i></p> <ul style="list-style-type: none"> <i>Floor areas should be in square metres and should be calculated from internal room dimensions. In addition to the above, planning application drawings must include the principal dimensions of each room as well as the aggregate floor area of each room.</i> <i>The provision of acceptable levels of natural light in new apartment developments is an important planning consideration as it contributes to the liveability and amenity enjoyed by apartment residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties. Section 5.3.7 of the SRDCSGs outlines requirements for the provision of acceptable levels of daylight in new residential developments and adjoining properties.</i> 	<p><i>A Daylight and Sunlight Assessment Report has been prepared by 3DDB and is enclosed with this application. The assessment has been prepared having regard to the latest BRE Guidelines. The scheme can be considered to be performing favourably with regard to daylight and sunlight.</i></p> <p><i>A Building Lifecycle Report prepared by Aramark including an assessment of long-term running and maintenance costs has been included in the planning application package.</i></p>

7.2.5 Urban Development and Building Heights – Guidelines for Planning Authorities (2018)

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

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

“It is a specific planning policy requirement that where:

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”.*

It is noted that the Building Heights Guidelines were issued prior to the publication of the DLRCDP, and as such the DLRCDP’s policies and objectives align with those set out in the guidelines. Specifically, it is highlighted that the Development Management Standards set out in Section 3 of the guidelines are aligned with the performance-based criteria set out in Table 5.1, Appendix 5 of the DLRCDP (Building Height Strategy). Therefore, it is considered that the assessment of the proposed development’s compliance with the DLRCDP’s Building Height Strategy provided in **Table 7-8** of this Report can also be read as an assessment of the proposed development’s compliance with the Building Height Guidelines.

7.2.6 Childcare Facilities - Guidelines for Planning Authorities (2001)

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

Planning Report & Statement of Consistency with Planning Policy

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

A *Childcare Facility Capacity Assessment* was prepared by RPS as part of the SHD planning application ABP-311181-21. Having consideration for existing and permitted childcare facilities in the study area, population demographics, relevant policy and guidelines, the *Childcare Facility Capacity Assessment* concluded that the proposed facility would be more than sufficient to accommodate the anticipated demand for childcare spaces generated by the Phase 1 development (including Block A).

As requested by DLRCC, a new *Childcare Facility Capacity Assessment* has been prepared by RPS for the current Block A proposal and is submitted as part of the LRD application. The assessment confirms that an adequate quantum of childcare spaces is available to accommodate the Sea Gardens Phase 1 development, including the proposed Block A.

Having regard for the above, it is submitted that the proposed development is fully compliant with the Childcare Guidelines.

7.2.7 Design Manual for Urban Roads and Streets (2013)

Atkins have undertaken a separate appraisal of the proposed development and its conformity with the *Design Manual for Urban Roads and Streets 2013*. This appraisal of consistency (*DMURS Statement*) is enclosed with the *Traffic Impact Assessment* submitted as part of this application. The DMURS Statement concludes that the proposed “*DMURS approach together with a highly permeable network of streets will help maximise and facilitate active travel as the main mode for short to medium trips for future residents and visitors to the Sea Gardens Block A*”.

7.2.8 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)

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

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

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

12: “*Carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding, on specific sites and declaring any known flood history in the planning application form as required under the Planning and Development Regulations 2006.*”

13: “*Engage with planning authorities at an early stage, utilising the arrangements for pre-planning application consultation with regard to any flood risk assessment issues that may arise.*”

14: “*Carry out a site-specific flood risk assessment, as appropriate, and comply with the terms and conditions of any grant of planning permission with regard to the minimisation of flood risk*”.

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

7.3 Regional Level

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

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

“Take account of national policy – the NPF – Ireland 2040 and future national planning frameworks,

Support and reflect the economic policies and objectives of Government and link with spatial planning objectives,

Consider the qualities, population size, service offering and location of our towns and cities, and

Support balanced economic development, building on the individual strengths of the 3 Irish regions and our shared interests (including our links with Northern Ireland)”

The high-level vision set out in the RSES is:

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

This vision is underpinned by three key principles:

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

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

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

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

Planning Report & Statement of Consistency with Planning Policy

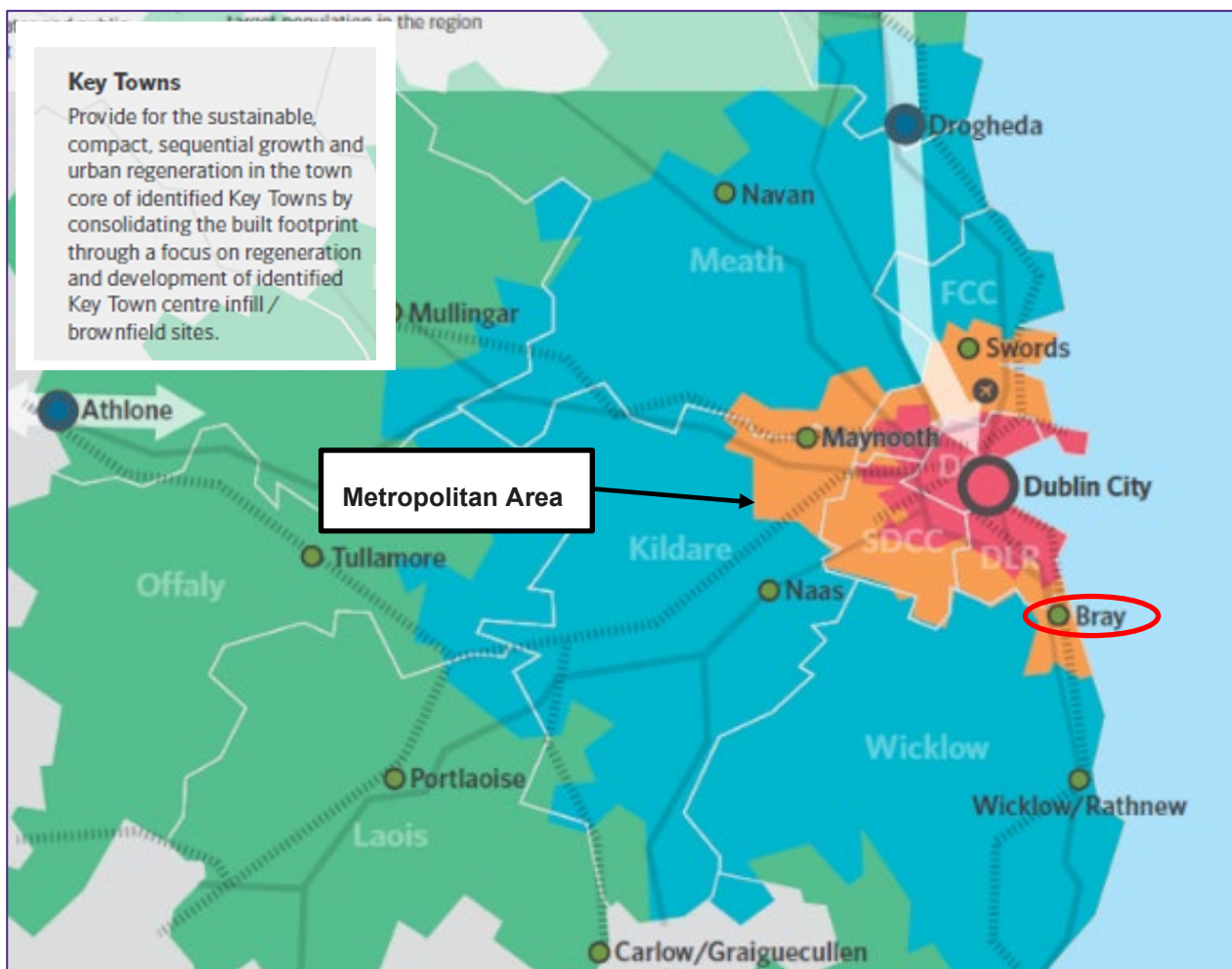


Figure 7-1: Bray and the Eastern and Midland Region

Source: EMRA, RSES Figure 4.2 Settlement Strategy

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

The consistency of the proposed development with the RSES is outlined in Table 7-5.

Table 7-4: RSES Consistency Appraisal

Regional Spatial and Economic Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
3 Key Principles	<p><i>“Heathy Placemaking - To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.”</i></p>	<p>The proposed development includes play areas for children and is located proximate to significant green areas including Corke Abbey Valley Park, Dargle Walk, Bray Harbour and coastal area. The location of the development supports pedestrian, cycling and public transport travel.</p>
	<p><i>“Climate Action - The need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this.”</i></p>	<p>Construction materials, public transport access and pedestrian cycle connectivity all promote climate resilience.</p> <p>The proposed development is served by existing public transport services including DART and the recently permitted BusConnects Bray – Dublin Bus Corridor and planned public transport services including DART+ Coastal South and the LUAS Green Line extension. The proposed development includes pedestrian / cycle linkages with Bray town centre and the coastal area as</p>

Planning Report & Statement of Consistency with Planning Policy

Regional Spatial and Economic Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
		<p>the overall layout favours pedestrian and cycle movement.</p> <p>Detail is provided on the building fabric elements and the efficient, longevity and maintenance are provided in the <i>Building Lifecycle Report</i> prepared by Aramark and the <i>Climate Action and Energy Statement</i> prepared by Atkins & Metec and included as part of the application documentation.</p>
	<p><i>“Economic Opportunity - To create the right conditions and opportunities for the Region to realise sustainable economic growth and quality jobs that ensure a good living standard for all.”</i></p>	<p>The proposed development will increase housing supply thereby addressing a key potential constraint on economic growth within the region.</p>
Regional Strategic Outcomes	<p><i>“Compact Growth and Urban Regeneration - Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens.”</i></p>	<p>The proposed development is located within an existing large town (designated a “key town”) in the Dublin Metropolitan Area. The subject site was formerly part of a golf course and is currently underutilised.</p> <p>The proposed residential development will provide quality housing within an existing large town served by existing and planned public transport.</p>
	<p><i>“Integrated Transport and Land Use - Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.”</i></p>	<p>The proposed development is located within c. 800m of the existing Bray Daly railway station and c. 550m east of stops on the recently permitted Bray – Dublin Core Bus Corridor as part of BusConnects. It will also benefit from planned future public transport in the area such as the LUAS Green Line extension and DART+ Coastal South. The proposed development includes high quality pedestrian / cyclist links which will support connectivity with these public transport services and will support future ridership of bus and rail services. Further details of the proposed development’s support of sustainable transport and active travel are provided in the <i>Traffic Impact Assessment and Mobility Management Plan</i> prepared by Atkins and enclosed with this application.</p>
	<p><i>“Support the Transition to Low Carbon and Clean Energy - Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050.”</i></p>	<p>Construction materials, public transport access, pedestrian connectivity all promote climate resilience. The <i>Building Lifecycle Report</i> prepared by Aramark and <i>Climate Action and Energy Statement</i> prepared by Atkins and Metec included in the application documentation provides detail with respect to energy assumptions and futureproofing the proposed development.</p>
Housing Policy Objectives RPO 9.3	<p><i>“Support Local Authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low cost rental and affordable homeownership.”</i></p>	<p>In accordance with Section 96 of the Planning Act, a total of 16 no. units will be transferred to the planning authority for social and affordable housing. 14 no. of these units are located outside of the planning application boundary and have been constructed as permitted under ABP–311181-21. 2 no. units in the proposed Block A1 will make up the remainder of the Part V provision for the LRD planning application. The location of units proposed to be transferred to meet Part V requirements is illustrated Drawing No. BRA-HWS-02-ZZ-D-A-10104 prepared by Howells and enclosed as part of this application. A summary of costings in relation to Part V is also included with this</p>

Planning Report & Statement of Consistency with Planning Policy

Regional Spatial and Economic Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
		application, along with a letter of agreement from DLRCC (dated 25 th July 2025).
RPO 9.4	<i>“Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.”</i>	The proposed development includes a variety of apartment types including 1, 2 and 3 bed units in addition to 9 no. 4-bedroom houses. The variations in size, layout, storage space and private open space ensure the proposed development provides a range of housing types which will be attractive to a wide demographic. As detailed in the <i>Housing Quality Assessment</i> prepared by Howells, the proposed development includes public and private amenity spaces and play areas for younger and older children. The high quality existing and planned public transport provisions serving the proposed development ensure the development will be attractive to those without access to a private motor vehicle.
RPO 4.37	<i>“Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.”</i>	The proposed development will provide 159 no. residential units on the former Bray Golf Course lands within DLRCC’s administrative area which is served by existing (DART, Commuter Rail, Intercity Rail, and Dublin-Bray Bus Corridor) high-capacity public transport. It will also benefit from planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South). The mix of house types and unit sizes proposed provides for the compact and sustainable growth of Bray.
RPO 4.40	<i>“To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services.”</i>	The proposed development will greatly benefit upon completion of the planned DART+ Coastal South project and the LUAS Green Line extension, which will be directly adjacent to the Block A site. The URDF has allocated funding to the construction of a public transport bridge which will connect the former golf club lands to the DART railway station, this will cater for pedestrian, cycle and bus-based links and ultimately will cater for the LUAS in the longer term. This infrastructure will assist Bray’s renewal and development. The <i>Traffic Impact Assessment and Mobility Management Plan</i> prepared by Atkins and enclosed with this application provide further details regarding the proposed Block A’s integration with existing and planned transport infrastructure.
RPO 4.41	<i>“Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance.”</i>	The proposed development is within Bray town. All facilities within the town are easily accessible on foot or by bicycle and a cycle / pedestrian network within the subject site is proposed. The subject site is located approximately 800m from existing DART, commuter and intercity rail services and c. 550m from existing bus services and the recently permitted high-frequency Bray – Dublin Core Bus Corridor. The proposed masterplan layout ensures that the extension of the LUAS Green line and bus routes serving the site directly are facilitated.

Planning Report & Statement of Consistency with Planning Policy

Regional Spatial and Economic Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
		The <i>Traffic Impact Assessment and Mobility Management Plan</i> prepared by Atkins and enclosed with this application provide further details regarding the proposed development's support of sustainable transport and active travel.

7.3.2 Greater Dublin Area Transport Strategy 2022–2042

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

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

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

Table 7-5: GDA Transport Strategy

Transport Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Strategy Objective 5.3.2: Connected Communities and Better Quality of Life	<i>“To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.”</i>	<p>The proposed development:</p> <ul style="list-style-type: none"> • is located within Bray town and directly adjacent to two schools. The services and amenities within the town are within walking / cycling distance of the proposed development; • includes cycle and pedestrian paths, linking directly to an existing wider network of footpaths and cycle paths; and; • is located approximately 800m from Bray railway station, c. 550m from the Bray – Dublin Core Bus Corridor and directly adjacent to the planned LUAS Green line extension. The DART+ Coastal South project will also provide an increased frequency of train services in the town. <p>The <i>Traffic Impact Assessment and Mobility Management Plan</i> prepared by Atkins and enclosed with this application provide further details regarding the proposed development's support of active travel and its integration with existing, permitted and planned transport infrastructure.</p>
Measure PLAN3 – Housing and Transport	<i>“The NTA will continue to support sustainable housing provision in the GDA. SDZ Planning Schemes, Local Area Plans and large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the majority of travel demand.”</i>	The proposed development will deliver 159 no. residential units. A <i>Traffic Impact Assessment</i> has been prepared by Atkins. This document sets out the impact of the proposed development in relation to transport in the local area and measures to promote sustainable transport modes.
Measure PLAN4 – Consolidated Development	<i>“The NTA will only support development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services.”</i>	The proposed development is located within the “Key Town” of Bray as defined in the RSES. The site is directly adjacent to Bray town and is located approximately 800m from Bray railway station, c. 550m from the Bray – Dublin Core Bus Corridor. It will also benefit from planned future public transport

Planning Report & Statement of Consistency with Planning Policy

Transport Strategy

in the area (LUAS Green Line extension and DART+ Coastal South).

The *Traffic Impact Assessment* and *Mobility Management Plan* prepared by Atkins and enclosed with this application provide further details regarding the proposed Block A's integration with existing and planned transport infrastructure.

Measure PLAN7 – Transit-Oriented Development

“The NTA will continue to support and facilitate the delivery of Transit-Oriented Development at locations identified as appropriate for such, and will work with EMRA and the local authorities in identifying further locations served by existing and proposed public transport which are appropriate for high density development supporting a mix of uses.”

The proposed development is located within the “Key Town” of Bray as defined in the RSES. The site is directly adjacent to Bray town and is located approximately 800m from Bray railway station, c. 550m from the Bray – Dublin Core Bus Corridor. It will also benefit from planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South).

The *Traffic Impact Assessment* and *Mobility Management Plan* prepared by Atkins and enclosed with this application provide further details regarding the proposed Block A's integration with existing and planned transport infrastructure.

Considering the above, it is submitted that the proposed development is fully compliant with and supported by the *Greater Dublin Area Transport Strategy 2022-2042*.

7.3.3 2022 Greater Dublin Area Cycle Network

The *2022 Greater Dublin Area Cycle Network* plan published by the NTA identifies the urban and inter-urban cycle network and the green route network within the Greater Dublin Area. As shown in **Figure 7-2**, the subject site is proximate to a Greenway, a Primary Radial route, and multiple Feeder routes. The proposed public transport bridge to the south of the Sea Gardens site will provide direct access from the proposed development to Bray town centre via a Primary Radial route and is marked as a ‘Proposed Crossing Point’ on **Figure 7-2**. In the meantime, however access from Block A is available via the existing Dart underpass link to Bray Harbour between Phase 1 and Phase 2 of the *Sea Gardens Masterplan*.

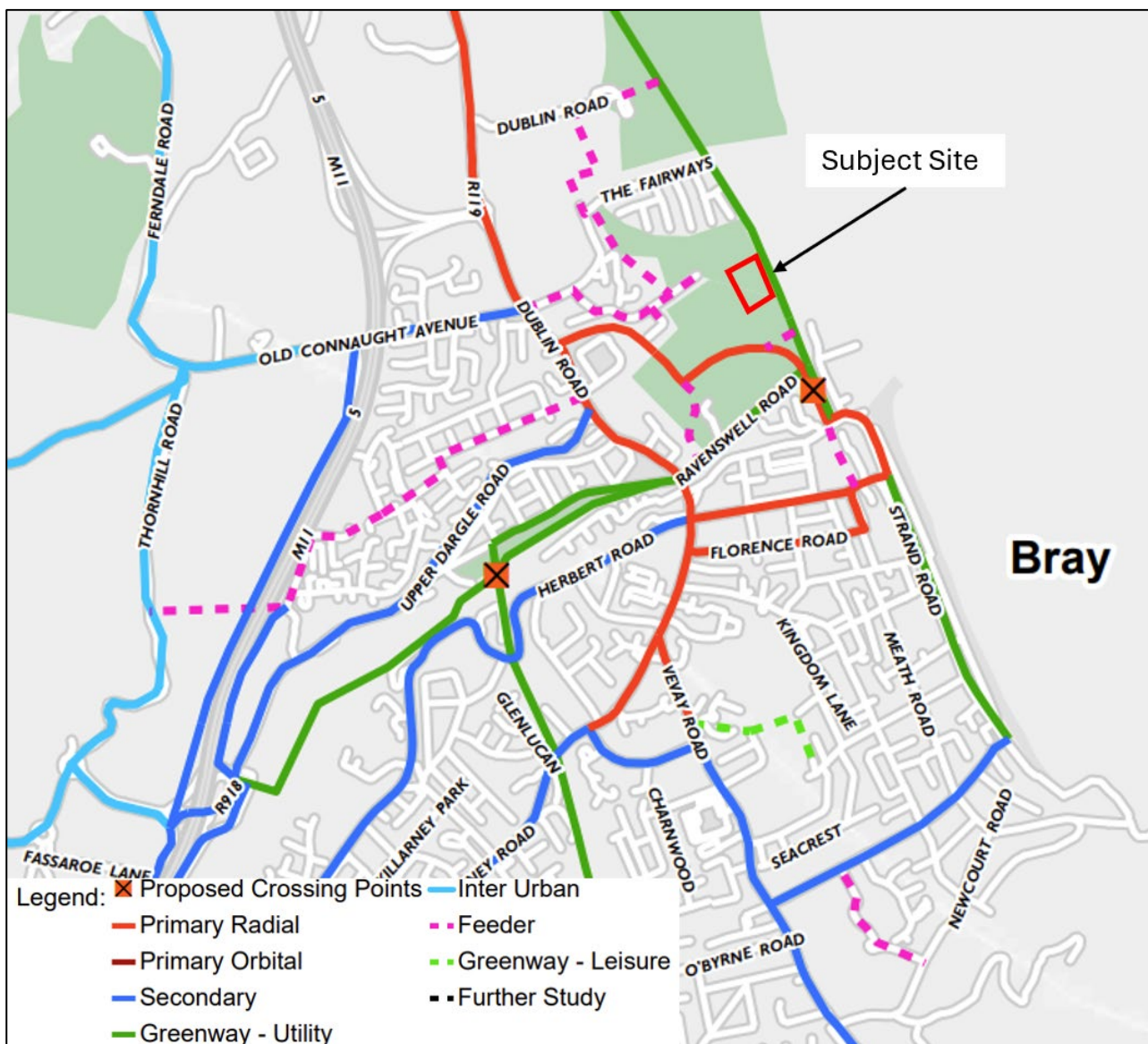


Figure 7-2: Proposed Cycle Network Within and Proximate to Subject Site

Source: 2022 Greater Dublin Area Cycle Network (additional annotations by RPS)

7.4 County & Local Level

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

The local planning policy framework for the site is set out in the DLRCDP. The future development of the subject lands is governed by this plan which sets out planning policies and objectives, as well as design standards for DLRCC’s administrative area. The Land Use Zoning objectives for the subject site and surrounding lands as set out by the DLRCDP are shown in **Figure 7-3** below.

Planning Report & Statement of Consistency with Planning Policy

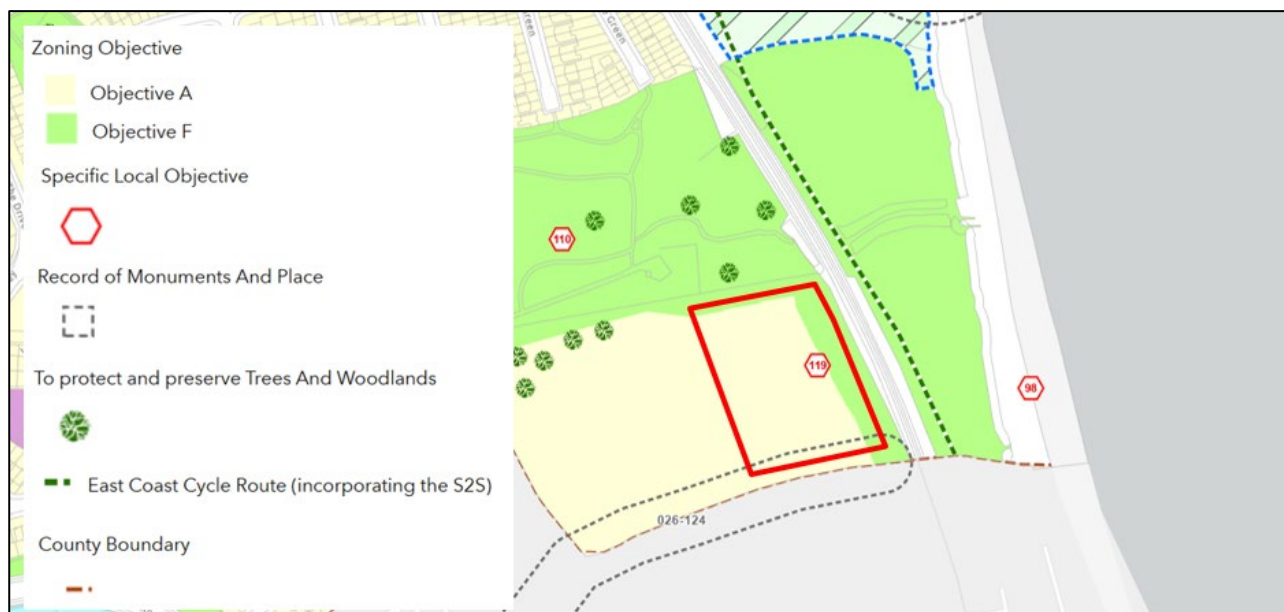


Figure 7-3: Land Use Zoning Objectives (site location outlined in red)

Source: DLRCDP 2022-2028 Zoning Map (Extract)

The local planning policy framework for the site is provided by the DLRCDP. A high-level vision statement set out in the plan seeks:

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

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

The Settlement Strategy of the DLRCDP seeks to:

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

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

The subject lands are located within the Greater Dublin Area, c. 800m to the north of the Bray Daly Railway Station which provides frequent DART and commuter services to and from Dublin’s city centre and beyond. The site is also located within c. 550m of bus stops on the recently permitted Bray – Dublin City Core Bus Corridor.

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

A majority of the application site features the DLRCDP’s ‘Objective A’ zoning which aims: *“To provide residential development and improve residential amenity while protecting the existing residential amenities”*. A small part of the site’s eastern boundary is zoned ‘Objective F’ which aims: *“To preserve and provide for open space with ancillary active recreational amenities”*. (see **Figure 7-3**).

The DLRCDP is underpinned by a number of cross cutting themes including the principles of creating a network of liveable towns and villages, a compact and connected county and a climate resilient country with a vibrant economy. Chapter 1 provides a strategic overview which sets the context for the more detailed policies and objectives contained therein. The DLRCDP’s overall aims and strategic direction of consolidated

Planning Report & Statement of Consistency with Planning Policy

development, efficient use of land and integrated transport and land-use planning was formulated from a consideration of various national, regional and local documents including the NPF and RSES for the Eastern and Midland region.

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

Table 7-6: DLRCDP Consistency Appraisal

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
Overarching Policy Objective PHP1:	<i>“That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to: Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment.”</i>	The proposed development seeks permission for 159 no. residential units within a designated Key Town in the Greater Dublin Area. Compliance with the NPF and EMRA RSES is set out in Sections 7.2.1 and 7.3.1 respectively. The proposals accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County.
Policy Objective PHP3: Planning for Sustainable Communities	<i>“Plan for communities in accordance with the aims, objectives and principles of ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual – A Best Practice Guide’ and any amendment thereof.</i> <i>Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.”</i>	It is noted that the <i>Sustainable Residential Development in Urban Areas Guidelines</i> have been superseded by the Compact Settlements Guidelines. Compliance with the Guidelines, in particular the ‘Key Indicators of Quality Design and Placemaking’ contained within, is demonstrated in Section 7.2.3 of this Report and in the <i>Architectural Design Statement</i> by Howells enclosed with this application. Consistency with the NPF and RSES is outlined in Sections 7.2.1 and 7.3.1 of this Report respectively.
Policy Objective PHP4: Villages and Neighbourhoods	<i>“It is a Policy Objective to: Implement a strategy for residential development based on a concept of sustainable urban villages. Promote and facilitate the provision of ‘10-minute’ neighbourhoods.”</i>	The proposed residential development is within an existing town, directly adjacent to schools and within c. 800m of the Bray Daly railway station. Public parks, communal amenity spaces, and a gym are all proposed as part of the subject development. Permitted and future sections of the <i>Sea Gardens Masterplan</i> site will together ensure that a wide range of facilities and uses are available to residents upon its completion. The proposed development and wider <i>Sea Gardens Masterplan</i> therefore effectively accord with the ‘10-minute’ neighbourhoods’ concept. The <i>Mobility Management Plan</i> prepared by Atkins and enclosed with this application provides further details of the existing and proposed active travel infrastructure within the Block A application site and the wider <i>Sea Gardens Masterplan</i> which will support the development of a 10-minute neighbourhood.
Policy Objective PHP6: Childcare Facilities	<i>“Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.</i> <i>Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.”</i>	The subject site is located within the built-up area of Bray and represents an infill development in close proximity to all services and facilities associated with a large town. A childcare facility providing a total of 88 no. spaces was previously permitted as part of the wider development under ABP-311181-21. This facility is located in Block C to the southwest of the Block A application site and is currently in operation. A <i>Childcare Facility Capacity Assessment</i> has been prepared by RPS and is submitted as part of the LRD application. The assessment confirms that an adequate quantum of childcare spaces is available to accommodate

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
		the Sea Gardens Phase 1 development, including the proposed Block A.
Policy Objective PHP18: Residential Density	<p><i>"Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.</i></p> <p><i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development."</i></p>	<p>The proposed development comprises of 159 no. apartments, duplexes and houses on a net site area of 1.18 hectares. The net density of the proposed Block A development will therefore be 134uph. The net site area for the calculation of density excludes part of the site subject to the land use zoning objective 'F' and other areas outside the immediate area of development. The wider Sea Gardens development within DLRC's administrative area will achieve a net density of 85uph when combining proposed Block A as proposed and Shoreside Park (under construction) as permitted under ABP Ref-311181-21.</p> <p>Further details and assessment of the proposed density for Block A and the wider <i>Sea Gardens Masterplan</i> are provided in Section 4.2.5 and Section 5.3 of this Report and in the <i>Architectural Design Statement</i> prepared by Howells.</p>
Policy Objective PHP20: Protection of Existing Residential Amenity.	<p><i>It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.</i></p>	<p>There are a limited number of existing homes immediately adjacent to the subject development, with the Irish Sea forming the eastern boundary to the site and Corke Abbey Valley Park to the north. Shoreside Park, which forms part of the <i>Sea Gardens Masterplan</i> development, is located to the immediate west of the site and is predominantly comprised of terraced houses. Particular attention has been given to the design of Block A and the surrounding open space to ensure that the amenity of these homes is protected.</p> <p>Further detail regarding Block A's design and its integration with surrounding residential areas is provided in Section 5.5 of this Report, in the <i>Architectural Design Statement</i> prepared by Howells and the <i>Landscape and Visual Impact Assessment</i> by Model Works enclosed with this application.</p>
Policy Objective PHP25:	<p><i>"It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in 'Housing for All – A new Housing Plan for Ireland, 2021'"</i></p>	<p>Accordance with <i>Housing for All – A new Housing Plan for Ireland, 2021</i> is set out in Section 7.2.2 of this report.</p>
Policy Objective PHP26: Implementation of the Housing Strategy	<p><i>"It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 - 2028.</i></p>	<p>The proposed development of 159 no. residential units will provide an increase in housing supply, which accords with the identified need for additional housing in the HDNA.</p>
Policy Objective PHP27: Housing Mix and Type	<p><i>"It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA."</i></p>	<p>The proposed development comprises a mix of apartments and houses, with units ranging from 1, 2, 3 to 4-bedrooms. It is considered the proposed development will contribute to a wide variety of housing and apartment types, sizes and tenures in accordance with the provisions of the Housing Strategy and Housing Need Demand set out by the DLRCDP. This is further detailed in the <i>Housing Quality Assessment</i> prepared by Howells and submitted as part of this application.</p>
Policy Objective PHP28: Build to Rent	<p><i>"It is a Policy Objective to facilitate the provision of Build-to-Rent in suitable locations across the County and accord with the provisions of 'Sustainable Urban Housing: Design Standards for New Apartments', 2020 (and any amendment thereof). Proliferation of Built to rent should be avoided in any one area. As the HNDA does not support provision of shared</i></p>	<p>No Build-to-Rent units are proposed as part of this application.</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
	<i>accommodation there shall be a presumption against granting planning permission for shared accommodation/coliving development”</i>	
Policy Objective PHP30: Housing for All	<i>Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.”</i>	The proposed development caters for a variety of lifestyle requirements by incorporating a good mix of units and types and settings in a central location. The provision of 1- and 2-bedroom apartment units in a location close to the town centre and public transport services meets well the needs of those seeking to downsize.
Policy Objective of Social Housing	<i>It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.</i>	In accordance with Section 96 of the PDA 2000, a total of 16 no. units will be transferred to the planning authority for social and affordable housing. 14 no. of these units are located outside of the planning application boundary and have been constructed as permitted under ABP–311181-21. 2 no. units in the proposed Block A1 will make up the remainder of the Part V provision for the LRD planning application. The location of units proposed to be transferred to meet Part V requirements is illustrated Drawing No. BRA-HWS-02-ZZ-D-A-10104 prepared by Howells and enclosed as part of this application. A summary of costings in relation to Part V is also included with this application, along with a letter of agreement from DLRCC (dated 25 th July 2025).
Policy Objective PHP35: Healthy Placemaking	<i>“Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013). Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.”</i>	The scheme is designed as a new urban quarter, with its own unique character and sense of place but merging seamlessly and respectfully with the existing built form of Bray town with a comparable scale and urban grain. The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 of this Report respectively. The proposed design closely aligns with the design standards outlined in the Urban Design Manual – A Best Practice Guide (2009) and in the Design Manual for Urban Roads and Streets (2013) Guidelines. A statement of consistency with DMURS is appended to the <i>Traffic Impact Assessment</i> prepared by Atkins along with the <i>Architectural Design Statement</i> prepared by Howells which addresses how the principles of these Urban Design Manual are incorporated in the proposed development.
Policy Objective PHP36: Inclusive Design & Universal Access	<i>It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i>	As confirmed in the <i>Housing Quality Assessment</i> prepared by Howells, the proposed development has been designed in accordance with Part M of the Building Regulations to ensure a universal and inclusive design for Block A.
Policy Objective PHP37: Public Realm Design	<i>It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.</i>	The proposed development will provide quality public spaces and new pedestrian / cycle routes enhancing access to existing public spaces both in the <i>Sea Gardens Masterplan</i> and the wider Bray area. Section 5.10 of this Report provides an assessment of proposed open space (public and communal) for Block A. The quality of the public realm proposed is further detailed in the <i>Architectural Design Statement</i> prepared by Howells and the <i>Landscape Report</i> by BSLA.
Policy Objective PHP38: Public Realm Offering	<i>It is a Policy Objective to preserve and enhance the public realm offering in our towns and villages.</i>	The proposed development will provide public spaces and new pedestrian / cycle routes enhancing access to existing public spaces.

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
		Section 5.10 of this Report provides an assessment of proposed open space (public and communal) for Block A. The quality of the public realm proposed is further detailed in the <i>Architectural Design Statement</i> prepared by Howells and the <i>Landscape Report</i> by BSLA.
Policy Objective PHP40: Shared Space Layouts	<i>It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).</i>	The proposed design closely aligns with the design standards outlined in the <i>Design Manual for Urban Roads and Streets</i> (2013) Guidelines. A statement of consistency with DMURS (enclosed with <i>Traffic Impact Assessment</i>) prepared by Atkins and the <i>Architectural Design Statement</i> , prepared by Howells set out in detail on how the principles of these Guidelines are incorporated in the proposed development.
Policy Objective PHP41: Safer Living Environment	<i>It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.</i>	The proposed development is a high-quality residential development with significant social elements. Access to communal areas is controlled. Public and communal open space and routes through the site benefit from passive surveillance. Further details are provided in the <i>Landscape Report</i> prepared by BSLA and enclosed with the application.
Policy Objective PHP42: Building Design & Height	<i>"Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF)."</i> <i>Appendix 5 - Policy Objective BHS 1- Increased Height It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate..... in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NPO 35, SPPR 1& 3). Appendix 5 also sets out "performance based criteria" for the consideration of increased building height.</i>	It is considered that the proposed development, within c. 800m of an existing DART station and c. 550m from the high-frequency Dublin – Bray Core Bus Corridor is an appropriate location for the buildings proposed and accords generally with the performance-based criteria. Section 6.2 of the <i>Architectural Design Statement</i> , prepared by Howells, sets out how the proposed heights are in accordance with the provisions of Appendix 5 and in particular the criteria set out in Table 5. The <i>Landscape and Visual Impact Assessment</i> prepared by Model Works provides further justification for the proposed height of Block A1 and A2. Section 5.4 of this Report also presents a rationale for the proposed building heights in the context of Appendix 5. Table 7-8 of this Report also sets out the proposed development's consistency with the <i>Urban Development and Building Heights – Guidelines for Planning Authorities</i> .
Policy Objective PHP44: Design Statements	<i>"It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme."</i>	An <i>Architectural Design Statement</i> prepared by Howells is enclosed in the planning application package. The Statement addresses how the proposed development incorporates the design criteria set out in the <i>Urban Design Manual - A Best Practice Guide</i> and complies with the Compact Settlements Guidelines and Apartments Guidelines.
Policy Objective T1: Integration of	<i>"It is a Policy Objective to actively support sustainable modes of transport and ensure</i>	The proposed development is within an existing town, includes dedicated cycle and pedestrian paths and is

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
Land Use and Transport Policies	<i>that land use and zoning are aligned with the provision and development of high quality public transport systems. (Consistent with NSO 1, NPO 26 of the NPF, 64, RPO 4.40, 5.3, 8.1 and Guiding Principles on Integration of Land Use and Transport of the RSES)."</i>	located c. 800m north of the Bray Daly railway station. The site is also within c. 550m of the recently permitted Bray – Dublin City Core Bus Corridor and existing bus services. It will also benefit from planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South) and the proposed public transport bridge allocated funding under the URDF. The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 of this Report respectively.
Policy Objective T9: Luas Extension and MetroLink	<i>It is a Policy Objective to promote, facilitate and cooperate with other agencies in securing the extension of the Luas network in the County as set out in the NTA's 'Greater Dublin Area Transport Strategy 2016-2035' and including any future upgrade to Metro. (Consistent with RPO 4.40 and 8.8 of the RSES)</i>	Included in the Greater Dublin Area Transport Strategy 2022-2042 are proposals to extend the Luas Green Line from Brides Glen to the Bray area. <i>Sea Gardens Masterplan</i> has been designed to facilitate such an extension and specifically the planned public transport bridge over the River Dargle. The <i>Traffic Impact Assessment</i> prepared by Atkins and enclosed with the application provides further details of the proposed development's integration with the planned Luas extension.
Policy Objective T11: Walking and Cycling	<i>"It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)."</i>	The proposed development includes dedicated cycle and pedestrian paths. North - south, and east - west pedestrian / cycle routes are proposed within the subject site. These routes provide direct connectivity to Bray town centre, Bray Daly railway station, bus stops along the Dublin Road, the East Coast Cycle Trail and Corke Abbey Valley Park. The consistency of the proposed development with the NPF and the RSES is outlined in Sections 7.2.1 and 7.3.1 of this Report respectively. The <i>Mobility Management Plan</i> and associated Drawing No. 1000118265-ATK-01-ZZ-DR-CE-66208 prepared by Atkins and enclosed with this application provide further details of the proposed active travel infrastructure for Block A.
Policy Objective T17: Travel Plans	<i>"It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)."</i>	A <i>Traffic Impact Assessment</i> prepared by Atkins is enclosed with this application and sets out the relevant strategy and measures proposed for Block A. It generally sets out a commitment to promoting alternatives and providing the means for active and sustainable travel choices to be made which include walking, cycling and public transport. The TIA is further supported by a <i>Mobility Management Plan</i> and a suite of drawings, both prepared by Atkins, which set out the proposed transport infrastructure for Block A.
Policy Objective T19: Carparking Standards	<i>"It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5."</i> Zone 2: House 1 per 1-2 bed 2 per 3 bed+ Apartment 1 space per 1-2 bed unit 2 spaces per 3-bed unit	The proposed rate and location of car parking is described in Section 4.5.1 of this Report. The quantum of parking has been selected to reflect national policy and guidance, specifically the Compact Settlements Guidelines which seek to reduce car parking in locations that are proximate to public transport corridors. The proposed quantum is also comfortably below that provided for in the DLRCDP. Further analysis of the proposed car parking's compliance with relevant policy is provided in Section 5.10 of this Report and the <i>Traffic Impact Assessment</i> by Atkins which is enclosed with this application.
Policy Objective T26: Traffic and Transport	<i>"It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in</i>	A <i>Traffic Impact Assessment</i> with an enclosed <i>Road Safety Audit</i> prepared by Atkins are submitted with this application.

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
Assessments and Road Safety Audits	<i>accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines."</i>	
Policy Objective E11: Remote Working	<i>"It is a Policy Objective to implement the National Remote Working Strategy and promote and assist in the provision of remote working infrastructure in appropriate locations and in particular, where these uses contribute to town centre regeneration, facilitate the reuse of existing and historic buildings, and bring added activity and vibrancy to the area."</i>	The proposed development is located proximate to Bray town centre and as such future residents could easily access any remote working hub that might be provided in the town centre. A c. 159.7sq. m communal amenity lounge is proposed on the ground floor of Block A1. This will offer residents of Block A the opportunity for remote working in a comfortable, secure environment.
Policy Objective E16: Home Working / E-Working	<i>"It is a Policy Objective to permit home-based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas."</i>	The mix of unit types and sizes being provided means there is scope for residents to work from home should they so choose. The communal amenity lounge proposed in Block A1 will also provide the opportunity for remote working.
Policy Objective CA18: Urban Greening	<i>"It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES)"</i>	The proposed development includes a comprehensive and considered <i>Landscape Report</i> prepared by BSLA. The landscape plan sets out details of the urban greening proposals, proposed SuDS measures, and the pedestrian and cycle networks integration with the surrounding landscape. Further details regarding landscaping and proposed SuDS measures are provided in Sections 4.3 and 4.7.1 of this Report respectively. The <i>Stormwater Impact Assessment Report</i> prepared by Atkins also sets out details of proposed SuDS measures for Block A.
Policy Objective OSR7: Trees, Woodland and Forestry	<i>"It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach. The Council will also seek to preserve trees, groups of trees and/or woodlands that form significant features in the landscape, and/or are important in setting the character, amenity, or ecology of an area. As part of this Plan, the Council Parks Department carried out a comprehensive review of the tree symbols on the 14 County Development Plan Maps (see also Section 12.8.11 Existing Trees and Hedgerows)."</i>	The objectives and policies of DLRCC's Tree Policy and Tree Strategy have been considered in relation to the proposed landscaping for the Block A development. As detailed in the <i>Landscape Report</i> and as shown in the Drawing No. DN2504_BSLA_P_001_SITEPLAN prepared by BSLA, additional tree planting is proposed throughout the public open space areas surrounding Block A. There is an area within the subject site in which tree symbols ("To protect and preserve Trees and Woodlands") are located. As shown in Drawing No. DN2504_BSLA_P_001_SITEPLAN prepared by BSLA, these trees are largely unimpacted by the proposed development.

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
Policy Objective OSR13: Play Facilities and Nature Based Play	<i>It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.</i>	<p>Proposed private open space within Block A's apartments accords with the Guidelines and will provide for children's play needs.</p> <p>C. 343sq. m of dedicated public play areas for children of all ages will be located in the north of the site. These spaces will comprise of a 'kickabout' green area, intended for informal play, and 2 no. 'natural play' areas which will feature non-prescriptive play facilities incorporating natural landscaping elements and encourage social interaction with accompanying adults.</p> <p>Further details of proposed play areas are set out in Section 4.3.1 and Section 5.10.1 of this Report, and in the <i>Landscape Report</i> prepared by BSLA and enclosed with this application.</p>
Green Roofs / Blue roofs	<p><i>Standard GR1- Planning applications which include roof areas of greater than 300 square metres for the following development types must make provision for a green and / or blue roof (which includes a green component) as part of development proposals. ♦ Apartment Developments</i></p> <p><i>Standard GR2 - To maximise the provision for biodiversity, green roofs must meet the following coverage requirements for all applicable buildings within the application boundary, subject to a reasonable allowance being made for the provision of services at roof level.</i></p> <p><i>Extensive 70%</i></p> <p><i>Intensive 50%</i></p>	<p>Surface water drainage for the proposed development site will employ SuDS techniques including green roofs. Further details are provided in the <i>Stormwater Impact Assessment Report</i> prepared by Atkins and submitted as part of this application.</p> <p>Section 4.7.1 of this Report also provides a summary of proposed SuDS and other drainage measures proposed for Block A.</p>
12.8.9 Play Facilities for Apartments and Residential Developments	<p><i>Children's play needs around the apartment building should include:</i></p> <ul style="list-style-type: none"> • <i>Within the private open space associated with individual apartments.</i> • <i>Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,</i> • <i>Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.</i> 	<p>Proposed private open space within Block A's apartments accords with the Guidelines and will provide for children's play needs.</p> <p>C. 343sq. m of dedicated public play areas for children of all ages will be located in the north of the site. These spaces will comprise of a 'kickabout' green area, intended for informal play, and 2 no. 'natural play' areas which will feature non-prescriptive play facilities incorporating natural landscaping elements and encourage social interaction with accompanying adults.</p> <p>Further details of proposed public play areas are set out in Section 4.3.1 and Section 5.10.1 of this Report, and in the <i>Landscape Report</i> prepared by BSLA and enclosed with this application.</p>
12.8.11 Existing Trees and Hedgerows	<i>New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural</i>	<p>As permitted under ABP-311181-21, the existing northern and eastern hedgerows near the application site boundary will be maintained and additional planting along these boundaries will also be provided, in addition to other public open space within the site.</p> <p>A Tree Survey Report was previously undertaken by Independent Tree Surveys as part of the EIAR submitted with SHD2 ABP-314686-22. The report found that the tree quality is generally low, with numerous smaller trees of relatively low value being spread around the old course.</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
	<i>Assessment and having regard to other objectives of the Plan.</i>	<p>The findings of the tree report have guided the preparation of the design proposals.</p> <p>There is an area adjacent to the northern boundary of the subject site in which tree symbols (“To protect and preserve Trees and Woodlands”) are designated by the DLRCDP. These trees will be unimpacted by the proposed development.</p>
Policy Objective HER1: Protection of Archaeological Heritage	<i>It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments.</i>	<p>The lands include an archaeological site comprising of a linear earthwork which runs along the county boundary line. This feature presents itself along a low bank and is recorded as a “possible linear earthwork” in the County Dublin edition of the Record of Monuments and Places (RMP no. 026-124). A number of archaeological investigations of this earthwork have been undertaken as part of previous planning applications in the area. These investigations concluded that the earthwork comprises of an 18th / 19th century landscape feature and is not a section of the ‘Pale’ ditch as had been previously postulated by Archaeological Survey of Ireland.</p> <p>These investigations are summarised in the <i>Archaeological Commentary</i> letter prepared by John Cronin and Associates enclosed with this application. The letter confirms the validity of the archaeological assessment provided within the <i>Environmental Impact Assessment Report</i> submitted as part of the planning application ABP-311181-21.</p>
Policy Objective HER2: Protection of Archaeological Material in Situ	<i>It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/ or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG).</i>	<p>The lands include an archaeological site comprising of a linear earthwork which runs along the county boundary line. This feature presents itself along a low bank and is recorded as a “possible linear earthwork” in the County Dublin edition of the Record of Monuments and Places (RMP no. 026-124). A number of archaeological investigations of this earthwork have been undertaken as part of previous planning applications in the area. These investigations concluded that the earthwork comprises of an 18th / 19th century landscape feature and is not a section of the ‘Pale’ ditch as had been previously postulated by Archaeological Survey of Ireland.</p> <p>These investigations are summarised in the <i>Archaeological Commentary</i> letter prepared by John Cronin and Associates enclosed with this application. The letter confirms the validity of the archaeological assessment provided within the <i>Environmental Impact Assessment Report</i> submitted as part of the planning application ABP-311181-21.</p>
Policy Objective EI9: Drainage Impact Assessment	<i>It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council’s Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).</i>	<p>Surface water drainage for the proposed development site will employ SuDS techniques including permeable paving, swales in park areas adjacent to roads, green roofs, filter drains to rear gardens, modular underground attenuation and flow control devices and will outfall via attenuation/storage tanks. Further details regarding drainage are provided in Section 4.7 of this Report and the <i>Stormwater Impact Assessment Report</i> prepared by Atkins and submitted as part of this application.</p>
Policy Objective GIB29: Nature Based Solutions	<i>It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption</i>	<p>The proposed surface water management strategy for the scheme incorporates SuDS techniques and NBS insofar as practicable at the site. Further details on the proposed</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal

Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
	<i>and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species</i>	development's use of SuDS and NBS are provided in Section 4.7 of this Report, the <i>Stormwater Impact Assessment Report</i> prepared by Atkins and <i>Landscape Report</i> prepared by BSLA, both submitted as part of this application.
Policy Objective GIB2: Landscape Character Areas	<i>"It is a Policy Objective to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County's landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the 'Draft Guidelines for Landscape and Landscape Assessment' (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with 'A National Landscape Strategy for Ireland – 2015-2025'. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage, and the Gaeltacht's National Landscape Strategy for Ireland, 2015 - 2025.</i>	A <i>Landscape and Visual Impact Assessment</i> by Model Works and <i>Landscape Report</i> have been prepared as part of the application and conclude that the proposed development will not have adverse impacts on the landscape character and visual amenity of the application site or surrounding lands. As shown in the <i>Landscape Report</i> , there will also be long term benefits created by the development including increased public access to Bray town centre and seafront for the wider community, managed habitats to encourage biodiversity improvement, formal recreation facilities and an increased awareness of the landscape and cultural features on the site. Section 5.5 of this Report also provides an assessment of the potential visual impact resulting from the proposed Block A development.
Policy Objective GIB6: Views and Prospects	<i>It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects."</i>	A <i>Landscape and Visual Impact Assessment</i> has been prepared by Model Works as part of the application and is supported by a suite of verified views which depict the proposed development in both the existing built environment and potential future built environment upon completion of the <i>Sea Gardens Masterplan</i> . No significant adverse impacts on landscape or visual amenity in the subject site and surrounds are identified in the assessment. Section 5.5 of this Report also provides an assessment of the potential visual impact resulting from the proposed Block A development.
Policy Objective GIB19: Habitats Directive	<i>"It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines."</i>	An <i>Appropriate Assessment Screening Report</i> for the proposed development has been undertaken by Atkins and is enclosed as part of this application. It concludes that there will be no adverse impacts on Natura 2000 sites as a result of the proposed development, and therefore a Stage 2 AA is not required. The planning application also includes an <i>Ecological Impact Assessment Report</i> prepared by Atkins which examines the ecological impacts of the proposed development and sets out all appropriate mitigation / avoidance measures. Section 6 of this report summarises the findings of the environmental assessments undertaken as part of this application.
Policy Objective OSR2: Hierarchy of	<i>"It is a Policy Objective to provide a hierarchy of attractive parks and public open spaces, which vary in size and nature, are</i>	The proposed development provides a hierarchy of attractive public open spaces, which vary in size and nature and are adjacent to the proposed residential units.

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
Parks and Open Space	<i>all inclusive, by being readily accessible and at a convenient distance from people's home and/ or places of work."</i>	<p>These are further detailed in the <i>Landscape Report</i> and associated drawings prepared by BSLA. Public spaces and parks within the wider Sea Gardens development are to be provided as detailed in the <i>Sea Gardens Masterplan</i> prepared by Howells.</p> <p>Section 4.3.1 of this Report also sets out the proposed provision of public open space for the Block A development.</p>
Policy Objective OSR4: Public Open Space Standards	<i>"It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2018)."</i>	<p>It is noted that the <i>Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities</i> has been superseded by the <i>Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities</i>.</p> <p>Details of how proposed open space for the Block A development complies with the provisions of the Compact Settlements Guidelines and the Apartments Guidelines are set out in Sections 7.2.3 and 7.2.4 of this Report respectively.</p> <p>The open space provision for residential development is also in accordance with the standards set out in the tables in Section 12.8.3 and Section 12.8.4 of the DLRCDP. Open space provision is further detailed in relation to the DLRCDP's standards in Section 5.10 of this Report and the <i>Landscape Report</i> prepared by BSLA.</p>
Policy Objective E16: Sustainable Drainage Systems	<i>"It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS)."</i>	<p>The SuDS measures employed as part of the proposed development are broadly set out as follows: -</p> <ul style="list-style-type: none"> • Underground attenuation. • Swales in park areas. • Porous / permeable paving. • Green roofs on apartment blocks. <p>Further details are provided in Section 4.7.1 of this Report and the <i>Stormwater Impact Assessment Report</i> prepared by Atkins.</p>
Policy Objective E115: Light Pollution	<i>"It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas."</i>	<p>A <i>Lighting Report</i> has been prepared by METEC and is enclosed with this application. The report demonstrates that all external lighting proposed for Block A is set out in accordance with the DLRC requirement with all streets and public paths having appropriately levels of lighting.</p> <p>Section 4.6.1 of this Report also provides details of proposed external lighting for Block A.</p>
12.2 Climate Action	<i>"An Energy Statement should be included for all applications of 1000+ sq.m. commercial development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered."</i>	<p>The enclosed <i>Climate Action and Energy Statement</i> prepared by METEC sets out how the proposed Block A development has been designed to improve its energy rating and reduce its potential carbon emissions.</p>
12.3.3.1 Residential Size and Mix	<i>Applications received in both new residential communities and within the residual built up area shall include: Details of existing and permitted unit types within a 10-minute walk of the proposed development. A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally</i>	<p>The proposed development is within an existing town with a variety of existing housing typologies.</p> <p>The closest existing housing is located in Woodbrook Glen and along Corke Abbey in which there are c.510 no. 3 / 4 bedroom semi-detached units. To the south of the subject site within Bray town centre there are a large no. of varied housing types and sizes.</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
	<p>be in accordance with Table 12.1. A site and/or floor plans that clearly identify proposed units that: Are designed and located having regard to the needs of older people and/or persons with a disability. Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes. A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes. No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types.”</p> <p>Table 12.1 in built up areas requires that “Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios. Minimum 20% 3+ bedroom units” (for apartments)</p>	<p>The proposed development will provide 159 no. apartments and houses within DLR, made up of 48 no. 1 bed units (30%), 58 no. 2 bed units (36%), and 44 no. 3 bed units (28%) and 9 no. 4 bed units (6%).</p> <p>No studio apartments are proposed as part of the development and the proposed one and two bed units comprise less than 80% of the total units. One bed apartments are under 30% of the overall units proposed. Over 20% of apartment units proposed are 3 bed units. Therefore, the proposed housing mix is compliant with Table 12.1 of the DLRCDP.</p> <p>The proposed development has been designed to ensure the needs of older people or persons with a disability are fully considered with ramped access and lifts provided throughout the development as required.</p> <p>Further information on housing mix is provided in the <i>Housing Quality Assessment</i> prepared by Howells and enclosed with this application.</p>
12.3.3.2 Residential Density	<p>In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document: ‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009). <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities</i> (2020). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4).</p>	<p>It is noted that the <i>Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities</i> has been superseded by the <i>Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities</i>.</p> <p>The subject proposals will provide a total of 159 no. units on an application site of c. 1.38 hectares, resulting in a gross residential density of 115 units per hectare (uph). The net site area (developable site area) equates to 1.18 hectares, resulting in a net residential density of 134 uph.</p> <p>The application site is appropriate for high-density residential development given the location of the site within a large town and being situated c. 800m from Bray Daly railway station and DART, commuter and intercity services. It will also benefit from planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South).</p> <p>Further details of how the proposed density of Block A complies with the provisions of the Compact Settlements Guidelines and the Apartments Guidelines are set out in Sections 7.2.3 and 7.2.4 of this Report respectively, as well as in the <i>Architectural Design Statement</i> and <i>Housing Quality Assessment</i> prepared by Howells.</p>
12.3.4.2 Habitable Rooms	<p>The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission, including the minimum dimensions as set out in ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’ (2018), and ‘Quality Practice Guidelines for Delivering Homes Sustaining Communities’ (2007).</p>	<p>All room sizes have been designed to meet or exceed the minimum requirements set out in the relevant guidelines. The <i>Housing Quality Assessment</i> prepared by Howells and enclosed with this application provides further details of all proposed unit sizes.</p> <p>Please see Section 7.2.4 of this Report for further detail of the proposed development’s compliance with the most recent guidelines <i>Planning Design Standards for Housing for Sustainable Communities: Best Apartments – Guidelines for Planning Authorities</i> (2025).</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal

Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
12.3.4.4 Phased Development	<i>No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development.</i>	The proposed development is located within a large town, with all the associated, existing facilities as described in this Report and supporting documentation. Confirmation of feasibility and design acceptance from UÉ is included in the enclosed <i>Engineering Report</i> prepared by Atkins. The existing and planned provision of high-capacity public transport services is described in the enclosed <i>Traffic Impact Assessment</i> prepared by Atkins. The adequate provision of childcare places is described in the enclosed <i>Childcare Facility Capacity Assessment</i> prepared by RPS.
12.3.4.7 Refuse Storage and Services	<i>Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection.</i>	Detail on refuse management is provided in the <i>Outline Operational Waste Management Plan</i> prepared by Atkins which is enclosed and sets out the proposed development's compliance with the policies and guidelines issued by DLRC. Adequate facilities for separated waste disposal are provided for. The collection point is accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. Bin storage for housing is indicated on enclosed drawings prepared by Howells. Section 4.6.2 of this Report also provides a summary of proposed refuse services for Block A.
12.3.5.1 Dual Aspect in Apartments	<i>There shall generally be a minimum of 50% dual aspect apartments in a single scheme.</i>	The proposed development will provide 100% dual aspect apartment units, ensuring that each unit has adequate access to daylight. Further details regarding the provision of dual aspect in Block A's apartment units are set out in the <i>Housing Quality Assessment</i> and <i>Architectural Design Statement</i> prepared by Howells and enclosed with this application.
12.3.5.2 Separation Between Blocks	<i>All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.</i>	Minimum separation distances as required by the DLRCDP and Compact Settlements Guidelines are achieved throughout the proposal, ensuring privacy and the protection of residential amenity. The enclosed <i>Architectural Design Statement</i> prepared by Howells contains a description of the design approach to distances between buildings and how residential amenities are secured and provided within the scheme. In addition, the <i>Daylight and Sunlight Assessment Report</i> prepared by 3DDB that accompanies the application shows the scheme performs well with respect to daylight and sunlight.

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
12.3.5.3 Internal Storage and External Storage	<p><i>Internal storage standards for apartments shall accord with, or exceed the levels outlined in Table 12.3:</i></p> <p><i>One Bedroom 3 sq.m.</i> <i>Two Bedroom (3 person) 5 sq. m.</i> <i>Two Bedroom (4 person) 6 sq. m.</i> <i>Three Bedroom 9 sq.m</i></p> <p><i>Storage should be additional to kitchen presses and bedroom furniture.</i> <i>Hot press/boiler space will not count as general storage.</i> <i>No individual storage room should exceed 3.5sq.m. and shall be provided within the apartment unit.</i></p> <p><i>Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.</i></p>	<p>All apartment units will be provided with internal storage space. Bulky storage units will also be provided within Block A's undercroft levels and will be allocated to specific units across Blocks A1 and A2. Cumulatively, the proposed storage exceeds the minimum requirements as set out in Table 12.3 of the DLRCDP.</p> <p>Further details of proposed storage provision and its compliance with the DLRCDP's standards is provided in the <i>Housing Quality Assessment</i> prepared by Howells and enclosed with this application.</p>
12.3.5.4 Penthouse Development	<p><i>The addition of a penthouse level – which typically consists of high quality roof level living accommodation in an apartment development - may be acceptable where living space constitutes the equivalent of one storey and is set back from the edge of the building. A penthouse level should have regard to the overall design of an apartment block and should be finished with high quality materials and not have a negative visual impact on the skyline and/or streetscape (refer also to the Building Height Strategy set out in Appendix 5).</i></p>	<p>The uppermost 2 floors of Blocks A1 and A2 are designated as penthouse levels. The two levels offer different typologies; 2 no. premium 3 bed apartments on the penultimate levels and 1 no. premium 3 bed apartment on each final penthouse level. All penthouse apartments have generous private amenity space with extensive views out over the Irish Sea. The <i>Architectural Design Statement</i> prepared by Howells provides further details on the penthouse levels.</p>
12.3.5.5 Minimum Apartment Floor Areas	<p><i>All apartment developments shall accord with or exceed the minimum floor areas indicated in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities Minimum Overall Floor Areas</i></p> <p><i>Studio 37 sq. m.</i> <i>One bedroom 45 sq. m.</i> <i>Two bedroom (3 persons) 63 sq. m.</i> <i>Two bedroom (4 persons) 73 sq. m.</i> <i>Three bedrooms 90 sq. m.</i></p>	<p>As detailed in the <i>Housing Quality Assessment</i> prepared by Howells and enclosed with this application, the minimum floor areas accord with those indicated in the <i>Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)</i>.</p>
2.3.6 Build-to-Rent Accommodation	<p><i>All proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out within the Design Standards for New Apartments, 2018 (and any amending SPPR as appropriate). In this regard applications for proposed BTR must clearly demonstrate compliance with the guidelines.</i></p>	<p>No Build-to-Rent units are proposed as part of the Block A development.</p>

Planning Report & Statement of Consistency with Planning Policy

DLRCDP 2022-2028 Consistency Appraisal		
Reference	Relevant Policy/ Objective/ Guidance	Statement of Consistency
12.9.2 Noise Pollution and Noise Nuisance	<i>Residential development should be set back from roads/rail lines such that amenities of residents are not unduly impacted upon by reason of noise. To address potential noise issues at post development stage, mitigation measures should be undertaken, where appropriate, between the residential development and road/rail line</i>	All proposed residential units as part of Block A will be sufficiently set back from the nearby rail line to ensure there are no negative impacts on residential amenity as a result of noise. The <i>Inward Noise Impact Assessment</i> prepared by AWN and submitted with this application details the mitigation measures proposed to ensure there are no negative impacts arising from noise on the proposed development.
12.9.4 Construction Management Plans	<i>Construction Management Plans (CMP) for developments generating construction activity - containing measures to mitigate against the effects of the construction - shall accompany planning applications for development of 3 residential units or more</i>	A <i>Construction Management Plan</i> has been prepared by Atkins as part of the application and is enclosed within.
12.9.6 New Development/Change of Use – Environmental Impacts	<p><i>Applications for developments of 10+ residential units shall include:</i></p> <ul style="list-style-type: none"> • <i>A Construction Management Plan that includes the following elements (which can be standalone documents):</i> <ul style="list-style-type: none"> i. <i>A Construction Waste Management Plan.</i> ii. <i>A Construction Environmental Management Plan.</i> iii. <i>A Construction Traffic Management Plan</i> • <i>An Operational Waste Management Plan</i> 	A <i>Construction Resource Waste Management Plan</i> , <i>Construction Environmental Management Plan</i> , <i>Construction Management Plan</i> , and an <i>Operational Waste Management Plan</i> have been prepared by Atkins and are enclosed with this application.

7.4.1.1 Building Height Strategy

DLRCC's policies in relation to building heights are set out in the County's Building Height Strategy, contained in Appendix 5 of the DLRCDP. The aim of this strategy is:

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

It is noted that the DLRCDP was prepared following the publication of the Building Height Guidelines and, as such, the DLRCDP's policies and objectives align with those set out in the Building Height Guidelines. In this regard, it is highlighted that the Development Management Standards set out in Section 3 of the guidelines are aligned with the performance-based criteria set out in Table 5.1, Appendix 5 of the DLRCDP. Therefore, it is considered that the assessment of the proposed development's compliance with the DLRCDP's Building Height Strategy provided below in **Table 7-8** can also be read as an assessment of the proposed development's compliance with the Building Height Guidelines.

Table 7-7: Building Height Strategy – Criteria for Assessing Proposals for Increased Height

	Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
	At County Level	
a.	<i>“Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.”</i>	The proposed development will deliver a sustainable, higher-density residential block within the wider Sea Gardens infill site, strategically located in the centre of Bray. The scheme will provide much-needed residential units within the existing built-up area of the town, and in close proximity to existing public transport services including the Bray Daly Railway Station and Dublin-Bray Bus Corridor – thereby ensuring compact urban growth as advocated by the <i>National Planning Framework (NPF)</i> .

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
1 At County Level	<p>Further details in relation to the site's accessibility and proximity to existing and planned public transport services are set out in the <i>Traffic Impact Assessment</i> prepared by Atkins and enclosed as part of this application. The proposed development's consistency with the objectives of the NPF is set out in Section 7.2.1 of this Report.</p>
<p>b. <i>"Site must be well served by public transport – i.e. within 1000 metre/ 10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport."</i></p>	<p>The subject site is located c. 800m to the north of the Bray Daly Railway Station which provides frequent DART and commuter services to and from Dublin's city centre and beyond. The site is also located within c. 550m of bus stops on the recently permitted Bray – Dublin City Core Bus Corridor. Furthermore, the site will also benefit from planned future public transport in the area (LUAS Green Line extension and DART+ Coastal South) and the proposed public transport bridge across the River Dargle which has been allocated funding under the Urban Regeneration and Development Fund (URDF). While the proposed development is not dependent on this future service, it will greatly benefit from this planned infrastructure. Further details in relation to the site's accessibility and proximity to existing and planned public transport services are set out in the <i>Traffic Impact Assessment</i> prepared by Atkins and enclosed as part of this application.</p>
<p>c. <i>"Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area."</i></p>	<p>The subject proposals have been informed and align with the <i>Sea Gardens Masterplan</i> which considers the wider context of the site (see Section 4.1 of this Report). The proposals will include 2 no. taller buildings which will identify the northernmost boundary of the overall Sea Gardens development and provide a highly legible bookend to the higher density residential area that is being developed at this centrally located infill site. The upper floor levels of Blocks A1 and A2 will be stepped back from the western edge of the site, providing a gradual transition to the neighbouring properties to the west while addressing the expanse of the Irish Sea to the east, and maximising views over this natural amenity and surrounding proposed public open spaces. The terraced houses between these blocks will range in height from 3 to 4-storeys to provide a sense of enclosure of the adjoining access road and linear open space to the west, as well as providing a strong edge to the public open space located to the east. As highlighted in Section 4.2.7 of this Report, it is intended that the configuration and architectural language of Block A will be replicated in Block B, subject to a revised planning application for this neighbouring site. Features such as the Green Spine (permitted under ABP-311181-21 and proposed to be extended under this application) will deliver high-quality public realm areas while also having regard to the existing topography and setting of the wider site, including its cultural context and features such as the Nun's Walk. The <i>Architectural Design Statement</i> prepared by Howells and the <i>Landscape and Visual Impact Assessment</i> prepared by Model Works and 3DDB submitted with this application demonstrate how the proposed development will integrate into the surrounding built and natural environment while also delivering high-quality public realm spaces. A <i>Traffic Impact Assessment</i> has also been prepared by Atkins and includes full details of the subject proposal's compliance with the <i>Design Manual for Urban Roads and Streets</i> (2019).</p>
<p>d. <i>"Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view."</i></p>	<p>The proposed development's tallest elements (the eastern portions of Blocks A1 and A2) will be located closest to the seafront, creating a strong edge to this natural amenity and providing an appropriate scale to address the vastness of the Irish sea. The blocks have been configured and designed to ensure that they do not adversely affect views or prospects from other areas of the wider Sea Gardens development, or from other areas within Bray. The proposed perpendicular orientation to the coast and separation of Blocks A1 and A2 will allow for a framed view out to sea for both the proposed townhouses and existing houses located further to the west. The <i>Architectural Design Statement</i> prepared by Howells and <i>Landscape and Visual Impact Assessment</i> prepared by Model Works and 3DDB submitted</p>

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
1	At County Level
e. <i>“Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.”</i>	<p>with this application provide further detail on how the proposed development will integrate into Bray’s skyline.</p> <p>Bray is identified as a ‘Key Town’ in the DLRCDP. Such towns are defined as <i>“large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres”</i>.</p> <p>In this regard, and as set out in Section 2.1 of this Report, Bray is located along the N11/M11 corridor with high quality road infrastructure connecting it to Dublin’s city centre. The town is serviced by the Bray Daly Railway station which includes frequent, reliable DART services to and from the city centre and beyond. Bray also benefits from being located on Dublin-Bray Bus Corridor, with several bus services connecting the town to the city centre and surrounding areas. Bray also includes several areas of employment, as well as retail and community facilities capable of supporting the sustainable growth of the town and the provision of higher residential densities.</p> <p>The proposed development also includes site-specific infrastructure such as foul water drainage and a water supply network, both of which have been designed in accordance with UÉ standards and will connect into the relevant networks (as permitted under ABP-311181-21) within the overall Sea Gardens development. Surface water drainage will utilise SuDS measures and will also connect into the wider SuDS network for Sea Gardens as permitted under ABP-311181-21. These infrastructural features, as permitted, are currently under construction and are nearing completion.</p> <p>It is further noted that the subject site represents and infill development within the centre of Bray, with planning permission having previously been granted for a development similar to that currently proposed. In this regard, the suitability of the site in terms of its infrastructural carrying capacity has been established and accepted by both DLRCC and ABP in principle.</p> <p>Having regard for the above, it is considered that the proposed development will support Bray’s continued growth through the delivery of more sustainable, high-density, compact residential development.</p>

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
2	At District / Neighbourhood / Street Level
a. <i>“Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.”</i>	<p>The subject proposals have been informed by and align with the <i>Sea Gardens Masterplan</i> which considers the wider context of the site, its infill location within the centre of Bray and its relationship with the seafront, the River Dargle and the existing built environment in the town (see Section 4.1 of this Report).</p> <p>The proposals will include 2 no. taller buildings which will identify the northernmost boundary of the overall Sea Gardens development and provide a highly legible bookend to the higher density residential area that is being developed at this centrally located infill site.</p> <p>The proposed development has been designed to seamlessly integrate with other permitted developments in the Sea Gardens area (see Section 3 of this Report). In this regard, the upper floor levels of Blocks A1 and A2 will be stepped back from the western edge of the site, providing a gradual transition to the neighbouring properties to the west while addressing the expanse of the Irish Sea to the east, and maximising views over this natural amenity, the surrounding proposed public open spaces and Corke Abbey Valley Park to the north. This arrangement will provide passive supervision to these amenities and draw them into the wider urban area.</p> <p>The terraced houses between these blocks will range in height from 3 to 4-storeys to provide a sense of enclosure of the adjoining access road and linear open space to the west, as well as providing a strong edge to the public open space located to the east.</p>

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
2 At District / Neighbourhood / Street Level	<p>As highlighted in Section 4.2.7 of this Report, it is intended that the configuration and architectural language of Block A will be replicated in Block B, subject to a revised planning application for this neighbouring site. The development will also contribute significantly to the delivery of public open space in the area, including the provision of pedestrian and bicycle routes to connect to Corke Abbey Valley Park and facilitate links to Bray Harbour. The public open space has been designed to fully integrate into permitted development in the area. Features such as the Green Spine (permitted under ABP-311181-21 and proposed to be extended under this application) will deliver high-quality public realm areas while also having regard to the existing topography and setting of the wider site, including its cultural context and features such as the Nun's Walk.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells and <i>Landscape and Visual Impact Assessment</i> prepared by Model Works and 3DDB submitted with this application demonstrate how the proposed development will integrate into the surrounding built and natural environment while also delivering high-quality public realm spaces.</p> <p>A <i>Traffic Impact Assessment</i> has also been prepared by Atkins and includes full details of the subject proposal's compliance with the <i>Design Manual for Urban Roads and Streets</i> (2019).</p>
b. "Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks."	<p>In relation to this criterion, the Building Heights Guidelines note that proposals should demonstrate compliance with the 12 no. criteria as set out in the <i>Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities</i> (2009). It is noted that this document has been superseded by the Compact Housing Guidelines which include 'Key Indicators of Quality Design and Placemaking'. In this regard, Section 5.5 of this Planning Report, and the <i>Architectural Design Statement</i> prepared by Howells and enclosed as part of this application, illustrate how the subject proposals have been carefully designed with regard for these key indicators.</p> <p>In summary, the proposed Block A has been broken up in terms of its massing to provide four distinct blocks comprising of Blocks A1 and A2 at the northern and southern edges, and 2 no. rows of terraced townhouses at the eastern and western edges. Blocks A1 and A2 are further articulated through a series of step backs of the upper floor levels to ensure a gradual transition in height to Shoreside Park to the west, while delivering an appropriate scale to address the seafront to the east. The east and west elevations area also varied in terms of their height and massing, with the proposed townhouses providing contrast to Blocks A1 and A2 and ensuring visual interest. The location of fenestration and choice of materials and finishes further breaks up the proposed facades, thereby avoiding 'monolithic' or long, uninterrupted walls.</p> <p>The Building Heights Guidelines also note in relation to this criterion that proposals should demonstrate compliance with the <i>Design Manual for Urban Roads and Streets</i> (2019). In this regard, a <i>Traffic Impact Assessment</i> has been prepared by Atkins and includes full details of the subject proposal's compliance with the guidance.</p>
c. "Proposal must show use of high quality, well considered materials."	<p>As summarised in Section 4.2.8 of this Planning Report, high quality materials and finishes have been carefully selected to compliment existing and permitted surrounding developments while creating a strong sense of identity and distinctiveness as informed by the <i>Sea Gardens Masterplan</i>. The <i>Architectural Design Statement</i> prepared by Howells includes detailed information regarding the choice of materials for the proposed development.</p>
d. "Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage."	<p>The proposed development forms part of a wider scheme as set out in the <i>Sea Gardens Masterplan</i> and will integrate into the emerging urban context, road infrastructure and public spaces that are being delivered through the Shoreside Park development permitted under ABP-311181-21.</p> <p>The subject proposals will connect with, and extend, permitted public open spaces and ensure the delivery of key north-south thoroughfares including pedestrian and bicycle connections that connect the wider Sea Gardens development to the neighbouring Corke Abbey Valley Park. The proposals will complete the permitted 'Green Spine' along the western edge of the site, as well as the extensive public open space along the railway line and coast.</p>

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
2 At District / Neighbourhood / Street Level	
	<p>The <i>Architectural Design Statement</i> prepared by Howells demonstrates how the proposed development responds to its coastal setting and how the urban design context and public spaces will be enhanced by the scheme.</p> <p>The Building Height Strategy also notes under this performance criterion that proposals must meet the requirements of the <i>Flood Risk Management Guidelines for Planning Authorities</i> (2009). In this regard, a <i>Flood Risk Assessment</i> has been prepared by Atkins and is included as part of this application. The <i>Flood Risk Assessment</i> demonstrates the proposed development's compliance with these guidelines.</p>
e. "Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved."	<p>The proposed Block A development will enhance legibility of the area by providing two taller buildings that terminate the permitted west-east internal roads through neighbouring Shoreside Park. Blocks A1 and A2 will provide a gradual increase in height to the east to present a strong urban form at a scale appropriate to address the Irish Sea and create a well-defined edge and architectural language that will be carried through to Block B to the south (subject to a future planning application to WCC).</p> <p>At ground level, the subject proposals include active frontages onto high quality public realm areas, with materials and finishes carefully selected to further enhance legibility and sense of place.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells and submitted as part of this application further illustrates how the proposed development will positively contribute to the legibility of the area.</p>
f. "Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area."	<p>The proposed development forms part of a wider scheme that will deliver residential, commercial and community uses in a range of building types, including medium density townhouses and duplexes, and higher density apartment blocks.</p> <p>The subject proposals for Block A seek to further improve the range of dwelling types as well as a more balanced mix of unit sizes. It also provides for communal facilities including <i>inter alia</i>, residents' lounges, a gym and bicycle repair centre.</p> <p>The <i>Housing Quality Assessment</i> and <i>Architectural Design Statement</i> by Howells provide further details on the proposed dwelling types and ancillary community facilities.</p>
g. "Proposal should provide an appropriate level of enclosure of streets or spaces."	<p>Block A has been designed to provide active frontages and an appropriate sense of enclosure to the adjoining streets permitted under ABP-311181-21 by ensuring a suitable height to width ratio is achieved. A balance between separation distances and building height is proposed to address public spaces, including the Green Spine and access road that runs along the western edge of the subject site. Similarly, taller elements of the proposed development are located to the east to address the scale of the proposed open space and the coastal corridor.</p> <p>The proposed Blocks A1 and A2, along with the proposed townhouse, will also enclose an internal shared courtyard area at podium level – providing passive surveillance and active frontages to this space.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells provides further details on these design elements.</p>
h. "Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces."	<p>As noted above, Block A forms part of the wider Sea Gardens development which has been designed to provide a permeable network of public spaces and an urban grain that ensures appropriate height to width ratios are delivered to address surrounding streets and open spaces.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells provides further details on these design elements.</p>
i. "Proposal must make a positive contribution to the character and identity of the neighbourhood."	<p>The proposed development, in conjunction with the permitted Phase 1 development to the west (ABP-311181-21) will create a new urban neighbourhood in Bray, as envisaged in the <i>Sea Gardens Masterplan</i>. The layout, design, massing, height and selected materials and finishes have been carefully considered to respond to and enhance the character and identity of the surrounding urban area and its coastal setting.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells provides further details in this regard.</p>
j. "Proposal must respect the form of buildings and landscape around the site's edges and the	<p>The proposed development has been designed to respond to the built environment at its boundaries, including the permitted Phase 1 development to the west (ABP-311181-21) and the surrounding natural environment,</p>

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height		Assessment of Subject Proposals	
2	At District / Neighbourhood / Street Level		
	<i>amenity enjoyed by neighbouring properties.”</i>		including the Irish Sea and Corke Abbey Valley Park. The proposed arrangement will provide passive supervision to these amenities and draw them into the wider urban area. Residential amenity is protected and enhanced through the provision of appropriate separation distances, the provision of gradual transitions in scale and height, and the delivery of key public open spaces around Block A, while minimising overlooking and overshadowing of adjoining properties. The <i>Architectural Design Statement</i> prepared by Howells provides further details in this regard.
Criteria for Assessing Proposals for Increased Height		Assessment of Subject Proposals	
3	At Site / Building Scale		
a.	<i>“Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.”</i>		The proposed development will provide 100% dual aspect residential units, ensuring that each unit has an adequate access to daylight. The orientation of the apartment blocks and townhouses, as well as the design of the apartments themselves, will minimise overshadowing both within the subject site and on adjoining existing residential properties. A <i>Daylight and Sunlight Assessment Report</i> regarding the subject proposals has been undertaken by 3DDB and is submitted as part of this application. The analysis demonstrates the proposed Block A’s performance with regard to access to daylight and overshadowing
b.	<i>“Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance “Site Layout Planning for Daylight and Sunlight” (2nd Edition).”</i> <i>“Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.”</i>		The <i>Daylight and Sunlight Assessment Report</i> prepared by 3DDB and submitted as part of this application demonstrates the proposed development’s compliance with relevant guidelines and standards. It is noted that that the proposed development will result in an overall positive impact on existing, permitted and future neighbouring developments and, internally, will ensure a high standard of private and communal residential amenity.
c.	<i>“Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.”</i>		A <i>Daylight and Sunlight Assessment Report</i> regarding the subject proposals has been undertaken by 3DDB and is submitted as part of this application. The analysis demonstrates the proposed development’s compliance with relevant guidelines and standards and confirms that the proposed development will result in an overall positive impact on existing, permitted and future neighbouring developments and, internally, will ensure a high standard of private and communal residential amenity.
d.	<i>“Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.”</i>		The proposed development is not located in proximity to any Architectural Conservation Areas or protected structures. The subject proposals have considered all conservation-related issues that were previously raised in relation to the SHD applications under ABP-311181-21 and ABP-314686-22. In this regard, the proposed development has been carefully designed with respect for the county boundary which runs along the southern edge of the subject site. The locally known ‘Nun’s Walk’ follows this boundary and will be defined by engraved paving slabs laid through the public open space to the south of Block A, as previously agreed with DLRCC in the form of a compliance submission relating to ABP-311181-21. A <i>Landscape and Visual Impact Assessment</i> has been prepared by Model Works and provides further details on the proposed development’s integration with the built and cultural heritage of Bray. The assessment is enclosed as part of this LRD planning application.
e.	<i>“Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions</i>		The proposed development has been designed with regard for energy efficiency and anticipated embodied and operational carbon emissions, with measures incorporated into the design from the orientation of buildings to maximise solar gain to the provision of high quality finishes to ensure air

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height		Assessment of Subject Proposals
3	At Site / Building Scale	
	<i>over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development.”</i>	<p>tightness for individual units while allowing the efficient transfer of heat throughout the buildings.</p> <p>Further details of the proposed development’s energy efficiency are provided in the <i>Climate Action and Energy Statement</i> prepared by Metec.</p>
Criteria for Assessing Proposals for Increased Height		Assessment of Subject Proposals
4	County Specific Criteria	
a.	<i>“Having regard to the County’s outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.”</i>	<p>The proposed development is located along the coastline of Bray and has been designed to address this setting by providing a strong building line and increased building heights to respond to the scale of the Irish Sea.</p> <p>The <i>Architectural Design Statement</i> prepared by Howells and enclosed as part of the application provides details in relation to the proposed layout, height and massing, and how these elements have been designed to address the coastal setting and character of the area.</p> <p>A <i>Landscape and Visual Impact Assessment</i> has been prepared by Model Works and 3DDB and is enclosed with this LRD planning application.</p> <p>Photomontages are included as part of the Assessment to illustrate the potential impact of the proposed development in its current setting, including verified views from Bray Harbour and the southern seafront.</p>
b.	<i>“Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.”</i>	<p>The proposed Block A is located along Bray’s coastline and will have minimal impacts on views from nearby mountains and foothills.</p> <p>A <i>Landscape and Visual Impact Assessment</i> has been prepared by Model Works and 3DDB and is enclosed as part of this LRD planning application.</p>
c.	<i>“Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning’s stage).”</i>	No additional specific requirements were noted during the section 247 pre-application consultation meeting with DLRCC.
d.	<i>“Specific assessments such as assessment of microclimatic impacts such as down draft.”</i>	A <i>Wind Microclimate Modelling</i> report has been prepared by BFluid Ltd and is submitted with this LRD planning application. The report concludes that the proposed development is not likely to generate any negative microclimatic impacts such as down draft and does not introduce any critical impacts on the surrounding buildings or adjacent roads.
e.	<i>“Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.”</i>	<p>An <i>Ecological Impact Assessment</i> (EclA) has been prepared by Atkins and is submitted as part of this LRD planning application package. Having regard for assessments undertaken as part of the previously approved proposals for the subject site, it is considered that the proposed development is not likely to impact on sensitive bird or bat species subject to standard mitigation measures which are incorporated into the subject proposals.</p> <p>The application is also accompanied by an <i>Environmental Impact Assessment Screening Report</i> (EIA) and an <i>Appropriate Assessment Screening Report</i> (AA) (both prepared by Atkins) which provides further details in relation to potential impacts on wildlife, including sensitive bird and bat species.</p> <p>The proposed public lighting has been designed to minimise light spill and light pollution while ensuring public safety at night. Further details in relation to the proposed public lighting is set out in the <i>Lighting Report</i>, prepared by Metec.</p>
f.	<i>“Assessment that the proposals allows for the retention of</i>	A <i>Telecommunications Impact Assessment Report</i> has been prepared by ISM and is submitted as part of this LRD application package. Having regard for the above and assessments undertaken as part of the previously approved

Planning Report & Statement of Consistency with Planning Policy

Criteria for Assessing Proposals for Increased Height	Assessment of Subject Proposals
4 County Specific Criteria	
<i>telecommunications channels, such as microwave links.”</i>	proposals for the subject site, it is considered that the proposed development will not impact on telecommunications.
g. <i>“Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.”</i>	An <i>EIA Screening Report</i> has been prepared by Atkins and is included as part of this application. It provides an assessment of the proposed development and considers that there will not be a requirement for an EIAR. An <i>AA Screening Report</i> has also been prepared by Atkins and is included as part of this application. It provides an assessment of the proposed development and considers that there will not be a requirement for a Stage 2 AA.
h. <i>“Additional criteria for larger redevelopment sites with taller buildings.”</i>	No additional specific criteria were specified during the section 247 pre-application consultation meeting with DLRCC.
i. <i>“Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.”</i>	The proposed development demonstrates a considered design which will integrate with Shoreside Park (permitted under ABP-311181-21), the overall <i>Sea Gardens Masterplan</i> site, and any potential future development at the site’s boundaries. The development proposes higher elements in the eastern portion of the overall block to achieve an appropriate density and contribute to a greater variety of scale and building form in the wider area, while providing an appropriate transition to adjoining development to the west. The development will also contribute significantly to the delivery of public open space in the area, including the provision of pedestrian and bicycle routes to connect to Corke Abbey Valley Park and facilitate links to Bray Harbour. The public open space has been designed to fully integrate into permitted development in the area. Further information in relation to how the subject proposals will contribute to place making is set out in the <i>Architectural Design Statement</i> prepared by Howells and submitted as part of this application.
j. <i>“For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.”</i>	A <i>Daylight and Sunlight Assessment Report</i> has been prepared by 3DDB and is enclosed with this LRD planning application. The report demonstrates the proposed development’s compliance with all relevant guidelines and standards.

7.4.2 Bray and Environs Transport Study (2019)

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

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

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

These and other proposals are shown in **Figure 7-4**.

Planning Report & Statement of Consistency with Planning Policy



Figure 7-4: Preferred Approach 2035

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

With regard to the former Bray golf course lands, Section 2.3.2 of the Transport Study provides more detail regarding the infrastructure considered necessary to serve the “full build-out” of the lands. The consistency of the proposed development with these requirements is outlined in Table 7-8.

Table 7-8: Block A compliance with Bray and Environs Transport Study 2019

Transport Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Bray Golf Club Lands Section 2.3.2	<p>“The following is required to serve the full build-out of Bray Golf Club lands:</p> <p><i>Golf Club Lands development roads</i></p>	<p>The proposed development prioritises pedestrian and cycle linkages. The existing road network within Sea Gardens ensures that car movement within the site is minimised with there being no through trips possible. Connections and linkages to the permitted network of vehicular roadways under construction (as permitted under ABP-311181-21) are described more fully in the <i>Traffic Impact Assessment</i> and associated suite of drawings prepared by Atkins and enclosed with this application.</p> <p>A <i>Mobility Management Plan</i>, also prepared by Atkins, sets out details of the proposed Block A’s promotion of active travel through pedestrian and cycle infrastructure.</p>
	<p><i>Pedestrian and cycle links from the Golf Club to Bray Town Centre</i></p>	<p>Pedestrian / cycling routes connecting to those already permitted under ABP-311181-21 are proposed within the subject site, facilitating connections with the wider network including routes to Bray Town Centre, Bray Daly railway station, Corke Abbey Valley Park and the East Coast Cycle Trail.</p> <p>The <i>Mobility Management Plan</i> and suite of drawings prepared by Atkins provides further details of proposed active travel infrastructure for Block A.</p>
	<p><i>Dublin Road bus priority (part of Bray Core Bus Corridor);</i></p>	<p>The proposed development is located c. 550m from the recently permitted Bray – Dublin Core Bus Corridor.</p>

Planning Report & Statement of Consistency with Planning Policy

Transport Strategy

Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
	<i>Public transport, pedestrian and cycle bridge from the Golf Club Lands to Bray DART station for future use by LUAS;</i>	The site will greatly benefit from planned future public transport in the area (LUAS Green Line extension) and the proposed public transport bridge across the River Dargle which has been allocated funding under the Urban Regeneration and Development Fund (URDF). The <i>Traffic Impact Assessment</i> prepared by Atkins provides further details on how pedestrian and cycle linkages permitted under ABP-311181-21 and as described in the <i>Sea Gardens Masterplan</i> will integrate with the planned LUAS extension and public transport bridge.
	<i>Development of interchange at Bray DART Station</i>	The proposed development does not impact on the delivery of the project and will promote ridership on DART services.
	<i>Commitment to the phased introduction of bus and enhanced rail services in line with increased demand”</i>	The proposed development though predicated primarily on pedestrian and cycle movement will generate increased demand for bus and rail services.

Considering the above, it is submitted that the proposed development is fully compliant with the objectives of the *Bray and Environs Transport Study* (2019).

8 CONCLUSION

This Planning Report and Statement of Consistency has been prepared in line with the provisions set out in section 32 of the Planning Act and article 16A of the Planning Regulations. This Report addresses the items and recommendations set out by DLRCC during the section 247 pre-application consultation meetings, section 32B LRD pre-application meeting and LRD opinion, and provides a detailed overview of design considerations, modifications, and supporting documentation submitted in response to DLRCC's feedback. Further, it demonstrates that the proposed development is consistent with DLRCCDP policy and guidelines issued under section 28 of the Planning Act.

The design intent is to create a high-quality residential development on an infill site which integrates with adjoining developments, maximising existing public transport infrastructure and planned transport links and delivering national and regional objectives on compact growth and sustainable density.

The proposed development will integrate Block A into the wider Sea Gardens development for which planning permission and precedent has been previously granted under ABP-311181-21 and ABP-314686-22. The proposal will provide for much needed residential development at a highly accessible location in the centre of Bray. The density proposed is considered appropriate having regard for planning policies that seek to achieve more sustainable forms of development within built-up areas. The proposed building height, scale and massing is fully supported by planning policy and is in accordance with the development management standards set out in the Building Heights Guidelines, and the performance-based criteria set out in DLRCC's Building Height Strategy.

In addition, the proposal includes the provision of pedestrian/cyclist routes, enabling connectivity across the site and adjoining developments, and enhanced landscaping and public spaces which will contribute positively to the range of amenities within the wider Sea Gardens area. The quantum of proposed car parking reflects the proximity of the site to existing public transport services. It also reflects planning policies which seeks to reduce car parking provision at appropriate locations to achieve more sustainable, compact urban forms.

Having regard for the contents of this Planning Report and Statement of Consistency, it is concluded that the proposed development has been designed in accordance with relevant planning policy and will ensure the efficient utilisation of the infill site, achieve an appropriate balance between protecting the receiving environment and neighbouring amenities and achieving compact growth and a sustainable density within the centre of Bray.