



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

## Statement of Specific Information Requirements

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## Statement of Specific Information Requirements

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# 1 INTRODUCTION

RPS, West Pier Business Campus, Dun Laoghaire, Co. Dublin, in association with a multidisciplinary team, has been instructed to prepare this *Statement of Specific Information Requirements* 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, Co. Dublin, on behalf of the LRD applicant, Shankill Property Investments Ltd, One Royal Canal Ave, Royal Canal Park, Ashtown, Dublin, D15 DKW4.

Following initial consultations with DLRCC under section 247 of the *Planning and Development Act 2000*, as amended (the Act) (Ref no. PAC/LRD1/032/24), an LRD Meeting was held between the applicant, representatives of its design team and DLRCC on 14<sup>th</sup> April 2025 (Ref no. PAC/LRD2/003/25).

An LRD Opinion was received from DLRCC on 7 May 2025 in accordance with section 32D of the Act. A copy of the LRD Opinion is appended to this Report (see **Appendix A**).

The LRD Opinion concluded that:

*“The Planning Authority is of the opinion that the documentation submitted constitute a reasonable basis on which to make an application for permission for the proposed LRD”.*

Pursuant to article 16A(7) of the *Planning and Development Regulations 2001*, as amended (the Regulations), the LRD Opinion sets out 9 no. items, of which some relate to specific information requested and other items requiring further amendment to the proposal by the applicant and design team. This Report considers these items individually and provides a summarised response referring to other documentation where a more detailed or technical response is provided and necessary. This Report demonstrates that items raised in the LRD Opinion have been fully addressed.

The 9 no. items listed in section 9 of the LRD Opinion (see **Appendix A**) are outlined in **Section 2** of this Report, with a conclusion set out thereafter.

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# 2 RESPONSE TO SPECIFIC INFORMATION REQUIREMENTS OF THE LRD OPINION

The 9 no. items relating specific information requirements set out in section 9 of the LRD Opinion are outlined below together with direction as to where a more detailed or technical response is provided in the documentation submitted as part of the planning application.

It is highlighted that the planning application documentation has been prepared or updated in response to the items set in the LRD Opinion to ensure that the Planning Authority will have all the information it requires to come to a reasoned decision on this application.

## 2.1 Item No. 1 – Planning

Item No. 1 of the LRD Opinion relates to planning matters and addresses density, height, design and layout, housing mix, materials, visual impact, housing quality assessment, and storage. These items are addressed in the sections below:

### 2.1.1 Height

*“The Planning Authority have concerns regarding the height of the proposed apartment blocks. Strong justification to be provided for proposed building height of Block A1 and A2 in this coastal location having regard to the Policy Objective PHP42: Building Design & Height, Appendix 5: Building Height Strategy (Table 5.1, in particular) of the Dún Laoghaire Rathdown County Development Plan 2022-2028 and Guidelines on Urban Development and Building Heights for Planning Authorities (2018).*

*The Planning Authority note the building height of Block A was reduced from 12 storeys to 9-storeys by An Bord Pleanála in the determination of the previous application on site (ABP Ref. ABP-314686-22 refers). It is also noted that 15 storey apartment block on the Wicklow Co. Co. side of the scheme that is currently being decided on (WCC Ref. 2560207). If granted permission, this may set a precedent for increased height along the coast in this location.*

*It is also noted that changes to the permitted Block B (under ABP Ref. ABP-314686-22) are intended to be sought at a later stage by the Applicant.*

*Confirmation is required to demonstrate that the proposed development is capable of being acceptable in its own right as well as part of a larger future development. The Applicant is requested to submit contextual elevations and views of the proposed development in the context of what is currently permitted under ABP Ref. ABP-314686-22 rather as well as the context of what is currently proposed for Phase 2 and potential futures changes to Block B (Phase 1B)”.*

#### 2.1.1.1 Applicant’s Response

The proposed development’s compliance with Policy Objective PHP42, the County’s Building Height Strategy, and the *Guidelines on Urban Development and Building Heights for Planning Authorities, 2018* (the Building Heights Guidelines) is demonstrated in the following documents which are enclosed as part of the LRD planning application:

- *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS. Section 5 of this report provides an assessment of key planning issues including building height (Section 5.4), while Section 7 specifically addresses planning policy and national guidance, including Policy Objective PHP42 (Section 7.4.1, Table 7-7 of the RPS report), the County’s Building Height Strategy (Section 7.4.1.1, Table 7-8 of the RPS report) and the Building Heights Guidelines (Section 7.2.5 of the RPS report).
- *Sea Gardens Masterplan* prepared by Howells. This document sets out how the subject proposals form part of the wider plan for the Sea Gardens area and provides justification for the overall approach to locating taller buildings along the coast. The Masterplan provides context for the subject

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proposals with reference to the Phase 2 development that is currently being assessed by Wicklow County Council (WCC) under Reg. Ref. 25/60207. It also illustrates the Applicant's future proposals for Block B, for which a layout and design is being finalised and a planning application to WCC will be submitted shortly.

- *Architectural Design Statement* prepared by Howells. This document sets out how the proposed development been designed with regard for its neighbouring context, as well as providing justification for the design as a standalone building. It provides background to the proposed layout, massing, scale, height, materials and finishes and specifically addresses design criteria set out in the Building Heights Guidelines (Section 6.2) and the County's Building Height Strategy (Section 6.2).
- *Landscape and Visual Impact Assessment (LVIA)* prepared by Model Works. This document provides verified views from the surrounding area and illustrates the impact of the proposals from key viewpoints, including those highlighted as being particularly sensitive in the previous Strategic Housing Development (SHD) applications relating to the subject site (ABP-311181-21 and ABP-314686-22<sup>1</sup>). The LVIA considers the subject proposals with and without Block B as permitted under ABP-314686-22, and provides commentary in relation to the potential impact of Block A in the context of future proposals for Block B.

It is noted that the LRD Opinion refers to the An Bord Pleanála (ABP) determination in relation to ABP-314686-22, noting that "*Block A was reduced from 12 storeys to 9-storeys*". We trust that the reference to Block A in this regard is an inadvertent error as the relevant condition on this permission (Condition No. 2a) relates to Block B as opposed to Block A. Commentary in relation to the Board's decision and their reasons for reducing the overall height of Block B is set out in Section 3.1.2 of the *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS. It is highlighted that the subject proposals for Block A have been carefully designed to fully address all concerns raised by ABP's Inspector in their assessment of the SHD under ABP-314686-22. A detailed summary of the subject site's planning history is set out in Section 3 of the *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS and submitted as part of the planning application package.

The LRD Opinion refers to the 15-storey block (Block E) that forms part of the Sea Gardens Phase 2 planning application which encompasses the majority of the southern portion of the overall Sea Gardens site. This planning application is currently being assessed by WCC under Reg. Ref. 25/60207. We would respectfully highlight that the proposed 15-storey block must be considered as part of the overall height strategy for the Sea Gardens area. In this regard, the *Sea Gardens Masterplan*, prepared by Howells and enclosed as part of this subject planning application, provides justification for the height strategy for the wider masterplan area. The Masterplan illustrates how the subject proposals for Block A form a critical part of the overall approach which seeks to deliver a series of taller, finger block buildings, perpendicular to the coast. The Masterplan provides the context required to fully appreciate this strategy and includes supporting graphics to demonstrate how the proposed Block A will work with future proposals for Block B, and the proposed Phase 2 development, to realise the wider vision for the Sea Gardens area.

The LRD Opinion requests the Applicant to submit "*contextual elevations and views of the proposed development in the context of what is currently permitted under ABP Ref. ABP-314686-22 rather as well as the context of what is currently proposed for Phase 2 and potential futures changes to Block B (Phase 1B)*". To address this request, the following drawings have been prepared by Howells and are submitted as part of the LRD application documentation:

- Drawing No. BRA-HWS-BA-ZZ-D-A-10103\_P01 - Proposed Site Layout Plan Block B
- Drawing No. BRA-HWS-BA-ZZ-D-A-20500\_P02 - Block A Site Sections
- Drawing No. BRA-HWS-BA-ZZ-D-A-20501\_P02 - Block A Site Elevations.

In addition to these drawings, further contextual graphics are set out in Section 4.5 of the *Architectural Design Statement* prepared by Howells, as well as throughout the *Sea Gardens Masterplan*. Furthermore, the enclosed LVIA prepared by Model Works, includes verified views from further afield to illustrate the wider context and assist in the assessment of the potential visual impact of the proposals in relation to Block B as permitted under ABP-314686-22, and the remainder of the neighbouring Phase 1 development as permitted

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<sup>1</sup> A detailed summary of the subject site's planning history is set out in Section 3 of the *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS and submitted as part of the planning application package.

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under ABP-311181-21 and currently under construction. The drawings submitted as part of the planning application pack also include drawings to illustrate how the subject proposals will sit in the context of future proposals for Block B – the layout and design of which are currently being finalised.

Having regard for the above, it is considered that the enclosed documents and contextual drawings have fully addressed issues raised in the LRD Opinion in relation to building height.

### 2.1.2 Design and Layout

*“Further justification is required to satisfy the concerns regarding the change in scale and heights between the proposed apartment blocks and the intervening townhouses. Verified views and photomontages should be provided to demonstrate the resulting visual impact from the east and west of the site”.*

#### 2.1.2.1 Applicant’s Response

Justification in relation to the change in scale and height between the proposed Blocks A1 and B1, and the proposed intervening townhouses is set out in Section 4.5 of the *Architectural Design Statement* prepared by Howells and enclosed as part of the LRD application documentation.

The *Sea Gardens Masterplan*, also prepared by Howells and enclosed, provides further justification for the proposed design and layout by illustrating the subject proposals in the context of future plans for Block B and development in the wider masterplan area.

As noted in **Section 2.1.1.1** of this Report, a series of contextual elevations have also been prepared by Howells and submitted as part of the LRD planning application. Furthermore, the enclosed LVIA prepared by Model Works, includes verified views illustrate how the subject proposals will fit into its surrounding context, including views from the east and west of the site as required by the LRD Opinion.

### 2.1.3 Housing Mix

*“As per current proposals, evidence to demonstrate that the unit mix proposed is generally in accordance with Policy Objective PHP 27: Housing Mix and Table 12.1 of the Dún Laoghaire Rathdown County Development Plan 2022-2028 and the Sustainable Urban Housing: Design Standards for New Apartments (2023). The LRD Stage 3 Application should also include how the proposed unit mix will accord with the overall Sea Gardens development”.*

#### 2.1.3.1 Applicant’s Response

It is noted that the *Sustainable Urban Housing: Design Standards for New Apartments, 2023* were replaced by the *Planning Design Standards for Apartments – Guidelines for Planning Authorities* (the Apartments Guidelines) in July 2025. As such, all documentation submitted with this application has been updated to reflect the updated guidelines.

Sections 7.2.4 and 7.4.1 of the *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS and enclosed as part of the LRD application demonstrate how Block A’s housing mix complies with the relevant objectives of the Apartments Guidelines and the *Dún Laoghaire Rathdown County Development Plan 2022-2028* (DLRCDP) respectively. This is also demonstrated in the section 2.1 of the *Housing Quality Assessment* prepared by Howells and enclosed as part of the LRD application.

Section 8 of the *Sea Gardens Masterplan*, prepared by Howells and enclosed as part of the planning application package, sets out the proposed housing mix for the wider Sea Gardens development and demonstrates how this mix is in accordance with the relevant development standards. The Masterplan provides a full breakdown of the unit mix in each phase of development and highlights the mix within DLRCC’s and WCC’s administrative areas separately for clarity.

### 2.1.4 Materials

*“A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the*

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*apartment buildings, landscaped areas, pathways, entrances, boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the area and that are suitable for coastal location. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the unit typologies in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2023)*".

### 2.1.4.1 Applicant's Response

The *Architectural Design Statement* prepared by Howells and *Landscape Design Strategy* prepared by BSLA and enclosed as part of the LRD application, provide details of the proposed materials and finishes for the Block A development including, *inter alia*, proposed treatments for the apartment balconies in Blocks A1 and A2, landscaped areas, pathways, entrances, and boundary treatments throughout the application site.

Proposed materials and finishes for Block A have been selected with regard for the management and maintenance of the development, with further details set out in the *Building Lifecycle Report* prepared by Aramark and enclosed as part of the LRD application.

### 2.1.5 Visual Impact

*"A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, preferably including winter views, that would assist in understanding the relationship between the proposed development and its context (including the permitted development granted under ABP Ref. ABP-313252-22)".<sup>2</sup>*

### 2.1.5.1 Applicant's Response

A full suite of architectural drawings has been prepared by Howells and is enclosed as part of the LRD application. This includes contiguous elevations and long sections as referred to in **Section 2.1.1.1** of this Report.

The enclosed LVIA prepared by Model Works, includes verified views to assist in the assessment of the potential visual impact of the proposals in relation to Block B as permitted under ABP-314686-22, and the remainder of the neighbouring Phase 1 development as permitted under ABP-311181-21 and currently under construction. The verified views include both summer and winter views.

### 2.1.6 Housing Quality Assessment

*"A Housing Quality Assessment which provides the specific information regarding the proposed unit typologies required by the Dún Laoghaire Rathdown County Development Plan 2022-2028 and the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) and Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)".*

### 2.1.6.1 Applicant's Response

A *Housing Quality Assessment* has been prepared by Howells and is enclosed as part of the LRD application. The assessment illustrates the proposal's compliance with the relevant standards set out in the DLRCDP and relevant national guidelines, providing details in relation to the proposed: density; unit mix; floor areas; dual aspect ratios; floor to ceiling heights; lift and stair cores; internal storage areas; refuse

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<sup>2</sup> It is assumed that the LRD Opinion's reference to 'the permitted development' relates to ABP-314686-22 as opposed to ABP Ref. ABP-313252-22 (which relates to a development in Blackrock, Co. Dublin).

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storage areas; separation distances; communal facilities and amenity space; vehicular and bicycle parking; and private amenity space.

### 2.1.7 Storage

*“Details of the bulky storage provision for the apartment blocks having regard for Section 12.3.5.3 Internal Storage and External Storage of the Dún Laoghaire Rathdown County Development Plan 2022-2028”.*

#### 2.1.7.1 Applicant’s Response

Bulky storage for apartment residents will be provided at mezzanine level of Block A2 in 2 no. dedicated rooms. These rooms are shown on Drawing No. BRA-HWS-BA-01-D-A-20099 prepared by Howells and submitted as part of the LRD application. As illustrated in the enclosed *Housing Quality Assessment* prepared by Howells, all proposed storage areas have been designed in compliance with the relevant objectives and standards of the DLRCDP.

## 2.2 Item No. 2 – Traffic and Transportation

Item No. 2 of the LRD Opinion relates to transportation and refers to a Traffic Impact Assessment, cycle parking, car parking. These items are addressed in the sections below:

### 2.2.1 Traffic Impact Assessment

*“A Traffic Impact Assessment and swept path drawings should be provided”.*

#### 2.2.1.1 Applicant’s Response

A *Traffic Impact Assessment* (TIA) has been prepared by Atkins and is enclosed as part of the LRD planning application. The TIA has been prepared following consultation with DLRC’s Traffic and Transport Department and has been specifically tailored to assess key issues raised during pre-planning consultations with DLRC.

The TIA assesses the transport impacts of the development on the surrounding environment and demonstrates that the proposed changes in terms of traffic and transport are minor in nature. The TIA notes that the proposal will have an overall positive impact in supporting active and sustainable travel and will integrate well with the existing street network, as permitted under ABP-311181-21. It concludes that the development will be fully consistent with relevant national policies and guidance, as well as the DLRCDP. The suite of associated drawings prepared by Atkins that are submitted alongside the TIA includes swept path analyses for all relevant vehicle types.

### 2.2.2 Cycle Parking

*“The overall quantity of cycle parking to serve the residential element should be in accordance with the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024), 1 space per bedroom for long stay, 1 space per 5 units for visitor parking. A Cycle Audit should be provided.*

*DLR standard is Sheffield stand, the remaining cycle parking above requirement minimums may be of the Applicant’s choosing, provided it is well located across the site with high quality accessibility and passive surveillance.*

*The provision of visitor cycle parking should be re-examined to capitalise on the location and the links at the site with the placement of the cycle parking”.*

#### 2.2.2.1 Applicant’s Response

The proposed provision of cycle parking is addressed in Section 9 of the submitted TIA prepared by Atkins. The TIA demonstrates that the proposals are consistent with the quantum required by the *Sustainable*

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*Residential Development and Compact Settlements - Guidelines for Planning Authorities, 2024* (the Compact Settlements Guidelines). In this regard, a minimum of 1 no. long stay cycle space is provided per bedroom while 1 no. visitor space is provided per every 5 no. units. The locations of these spaces are highlighted in Figure 9-1 and Figure 9-2 of the TIA.

A *Cycle Audit* has been undertaken and is addressed in section 9.1 (Table 9-2) of the TIA. The *Cycle Audit* addresses each of DLRCC's 'Cycle Parking Assessment Criteria' in detail to illustrate the proposal's compliance with section 12.4.6.2 of the DLRCDP.

Section 9 of the TIA describes the types of bicycle stands proposed and illustrates how the quantum of Sheffield stand facilities is consistent with DLRCC's cycle parking standards. A full qualitative assessment is set out in the *Cycle Audit* – providing justification for the location on non-Sheffield stand facilities with regard of, *inter alia*, accessibility and passive surveillance.

As requested by DLRCC's LRD Opinion, the location of the proposed visitor cycle parking stands has been revised to capitalise on the links within the site to both the overall Sea Gardens development and the wider Bray urban area. Section 9 of the TIA prepared by Atkins illustrates the proposed revised locations of visitor cycle parking stands (see Figure 9-2) and provides commentary in this regard.

### 2.2.3 Car Parking

*“Proposed parking ratio (1:1.08) is noted. Further consideration / justification is required in relation to the provision of car parking. Further reduction in the provision of car parking to serve the residential element of development should be considered having regard for the principles outlined within the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024).”*

*The following shall also be demonstrated: -*

- *1 in 5 no. car parking spaces to be equipped with fully functional EV charging points*
- *All car parking spaces to be future proofed to accommodate fitting of EV charging points without the need for intrusive works.*
- *Provision of motorcycle parking in accordance with the Dún Laoghaire Rathdown County Development Plan 2022-2028.*

*NOTE: In accordance with SPPR 3 of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024), the maximum car parking standards do not include bays assigned for use by 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”.*

#### 2.2.3.1 Applicant's Response

It is highlighted that Block A, as permitted under ABP-314686-22, provided build-to-rent apartments with a higher portion of 1 and 2-bed units. A reduced quantum of car parking was therefore proposed, in line with the anticipated requirements of future occupants. As noted in section 3.3 of the *Planning Report and Statement of Consistency* prepared by RPS and submitted as part of the LRD application documentation, the Applicant no longer intends to provide build-to-rent units at Block A. The subject LRD proposals include a greater proportion of family-sized units which will be sold on the private market. In this regard, a higher quantum of parking provision is proposed to meet the anticipated requirements of future occupants.

Notwithstanding the above, and as highlighted in Section 8 of the TIA 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. Further details in relation to the proposed quantum of car parking and its accordance with planning policy is set out in Section 5.8 the *Planning Report and Statement of Consistency* prepared by RPS and submitted as part of the LRD application documentation.

Section 8.2 of the TIA prepared by Atkins confirms that 1 in 5 no. car parking spaces will be equipped with fully functional EV charging points, and that all other car parking spaces will be able to accommodate the fitting of EV charging.

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Section 8.2 of the TIA prepared by Atkins confirms that the proposed provision of 8 no. motorcycle parking spaces is fully in accordance with the DLRCDP.

### 2.3 Item No. 3 – Open Space and Landscaping

Item No. 3 of the LRD Opinion relates to open space and landscaping and refers to a public open space provision and private amenity space. These items are addressed in the sections below:

#### 2.3.1 Public Open Space Provision

*“Evidence (including a colour-coded map) to demonstrate that the proposed development is in accordance with the standards for public, communal and private open space set out by the relevant provisions under the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) and the Sustainable Urban Housing: Design Standards for New Apartments (2023).*

*The information must include a quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc. having regard for the public / communal open space requirements set out in the Dún Laoghaire Rathdown County Development Plan 2022-2028.*

*Details of the proposed levels and gradients of any public / communal open space should be submitted for consideration as well as access routes. Details of connections into Corke Abbey and protection of hedgerows trees at the northern end of the site should be provided. The Greenway link should be at least 4m in width.*

*Cross sections and further landscaping details of the proposed development should be provided”.*

##### 2.3.1.1 Applicant’s Response

The *Landscape Design Strategy* and associated drawings (including a colour-coded (Drawing No. DN2504\_BSLA\_P\_001\_SITEPLAN) prepared by BSLA and enclosed as part of the LRD application demonstrate that the proposed development’s provision of public, communal and private open space will be fully compliant with the quantitative and qualitative standards set out by the relevant guidelines.

The suite of landscape drawings prepared by BSLA provides details regarding levels of all open space areas and access routes, including those connecting the subject site with Corke Abbey Valley Park. The drawings confirm that the proposed greenway link will be at least 4m wide to comfortably accommodate both pedestrians and cyclists. It is noted that the LRD application’s northern boundary does not extend into the hedgerow / tree boundary which separates the subject site from Corke Abbey Valley Park. As such, no removal of hedgerows / trees along this boundary is proposed and root protection areas will not be impacted.

Cross sections of proposed landscaping works are included in the suite of drawings prepared by BSLA and enclosed as part of the LRD application.

Further assessment of the proposed communal and public open space is provided in the *Landscape Design Strategy* and in Section 7 of the *Planning Report and Statement of Consistency with Planning Policy* prepared by RPS which details the functionality and quality of the dedicated open space areas with regard to the standards of the DLRCDP.

#### 2.3.2 Private Amenity Space

*“Details of mitigation against potential overlooking of private amenity spaces of town houses from proposed balconies apartments, if required”.*

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### 2.3.2.1 Applicant's Response

It is highlighted that the proposed private amenity spaces for Block A's 9 no. townhouses exceed the minimum area requirements set out in the DLRCDP. This is illustrated in the *Housing Quality Assessment* and suite of architectural drawings prepared by Howells and submitted as part of the LRD application package. Any private amenity areas associated with the proposed townhouses that could potentially be overlooked by the adjoining apartment blocks represent areas that are being provided in addition to the minimum requirements.

The *Housing Quality Assessment, Architectural Design Statement* and suite of drawings prepared by Howells provide further details regarding proposed private amenity space and how such spaces have been designed to avoid overlooking from apartment units in Blocks A1 and A2.

## 2.4 Item No. 4 – Childcare

Item No. 4 of the LRD Opinion relates to childcare facilities and refers to the preparation of an assessment regarding the same. DLRCC's request and the Applicant's response are provided below.

### 2.4.1 Childcare

*“Justification to be provided as to why a dedicated childcare facility is not required as part of the subject application and that the quantum, size and form of the childcare facility granted under ABP-311181-21 is appropriate to meet the needs of future residents in the form of a childcare facility capacity assessment”.*

#### 2.4.1.1 Applicant's Response

A *Childcare Facility Capacity Assessment* has been prepared by RPS and is enclosed as part of the LRD planning application. The 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.

Having regard for the above, it is submitted that all issues relating to childcare as raised in Item No. 4 of the LRD Opinion have been fully addressed in the LRD application documentation.

## 2.5 Item No. 5 – Daylight, Sunlight and Overshadowing

Item No. 5 of the LRD Opinion refers to the preparation of an assessment regarding daylight, sunlight and overshadowing within the proposed Block A development and the potential impact on surrounding areas. DLRCC's request and the Applicant's response are provided below.

### 2.5.1 Daylight, Sunlight and Overshadowing

*“A comprehensive daylight / sunlight / shadow assessment demonstrating the quality and performance of the proposed development as well as the impact of the proposed development on the surrounding context, particularly the potential impact of overshadowing of apartment blocks onto terraced townhouses”.*

#### 2.5.1.1 Applicant's Response

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 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

## Statement of Specific Information Requirements

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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.

Having regard for the findings set out in the assessment, 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.

Having regard for the above, it is submitted that all issues relating to daylight, sunlight and overshadowing as raised in Item No. 5 of the LRD Opinion have been fully addressed in the LRD application documentation.

## 2.6 Item No. 6 – Biodiversity

Item No. 6 of the LRD Opinion relates to biodiversity. DLRCC's requests and the Applicant's responses are provided below.

### 2.6.1 Biodiversity

*"A Report that addresses any concerns raised by the Biodiversity Officer (full report appended), in particular the application should be supported by up-to-date surveys as per CIEEM Advice Note: Lifespan of Ecological reports and Surveys.*

*The following requests should also be adhered to:*

- *Landscape architect should liaise with the Ecologist when it comes to planting for the development.*
- *Dark zones in planting to be provided along site boundaries.*
- *All biodiversity measures set out in the EclA should also be included in the CEMP."*

#### 2.6.1.1 Applicant's Response

An *Ecological Impact Assessment* (EclA) has been prepared by Atkins and is submitted as part of the LRD planning application. This document addresses all issues raised by DLRCC's Biodiversity Officer and is supported by up-to-date surveys.

The project's Ecologist and Landscape Architect have liaised closely to develop a planting plan for the scheme, as set out in the *Landscape Design Strategy* and associated drawings prepared by BSLA and enclosed as part of the LRD application.

The treatment of site boundaries within the Phase 1 area of the Sea Gardens Masterplan lands was approved as part of the SHD1 application ABP-311181-21. This application's boundary is located slightly further south to allow boundary treatments approved under the SHD1 decision (and as agreed with DLRCC in compliance with condition no. 4 of ABP's decision) to be fully implemented. Ecological buffer zones along the northern and eastern boundaries of the site will have mixed native hedge and woodland screening along the existing boundary fence to help create bat flight lines and foraging routes as well as providing connectivity between the dark zones of the River Dargle and Rathmichael Stream. The EclA prepared by Atkins and enclosed as part of the LRD application provides further information in relation to planting within dark zones within the application site.

We can also confirm that all biodiversity measures set out in the EclA have been included in the *Construction and Environmental Management Plan* (CEMP).

Having regard for the above, it is submitted that all issues relating to biodiversity as raised in Item No. 6 of the LRD Opinion have been fully addressed in the LRD application documentation.

## 2.7 Item No. 7 – Drainage Planning

Item No. 7 of the LRD Opinion relates to drainage and refers to the preparation of an assessment regarding the same. DLRCC's request and the Applicant's response are provided below.

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### 2.7.1 Drainage Planning

*“A Report that addresses the concerns of the Drainage Planning Department (full report appended). The Planning Authority have considered the commentary provided by the Drainage Planning Department and concur with the recommendations made”.*

#### 2.7.1.1 Applicant’s Response

An *Stormwater Impact Assessment Report* has been prepared by Atkins and is enclosed as part of the LRD application. The report addresses the concerns of the DLRCC’s Drainage Planning Department and provides details regarding proposed surface water drainage and the provision of green roofs in Block A.

A *Flood Risk Assessment* has also been prepared by Atkins and is submitted as part of this application. The Assessment determines that the proposed surface water drainage system for Block A will be sufficient in the event of blockage or partial blockage of the system.

Having regard for the above, it is submitted that all issues relating to drainage as raised in Item No. 7 of the LRD Opinion have been fully addressed in the LRD application documentation.

## 2.8 Item No. 8 – Site Services

Item No. 8 of the LRD Opinion relates to various site services required for the proposed development. DLRCC’s requests and the Applicant’s responses are provided below.

### 2.8.1 Site Services

*“Provision of a public lighting layout and report. The public lighting layout should tie in with rest of Sea Gardens development and should be co-ordinated with the landscape layout to avoid conflicts with trees. Proposals should avoid light overspill – only the paths should be lit.*

*Submission of a Taking in Charge Map.*

*The PA advised the Applicant to be conscious of the fact that this development may attract a high percentage of EV cars. The applicant was advised to overestimate this rate when applying to the ESB in order to be sure of being capable of satisfying the future demand.*

*It has been advised consideration is given to providing electric charging facilities for bicycles at the bicycle parking stands. Also, it is considered that this development may attract a high percentage of EV cars which should be taken into consideration when applying to the ESB in order to be sure of being capable of satisfying the future demand.*

*A letter from Uisce Éireann confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no more than 6 months before the date of lodgement of the LRD planning application.*

*Submission of Wind and Pedestrian Comfort Study which addresses the impact of the proposals on the usability of the surrounding development particularly for pedestrians and cyclists etc.*

*A report detailing how the proposed development accords with the objectives and policies set out in Chapter 3 – Climate Action of the Dún Laoghaire Rathdown County Development Plan 2022-2028, in achieving a sustainable planning outcome to include any proposals they may have for e.g. passive housing, renewable energy, solar and wind energy infrastructure, district heating etc”.*

#### 2.8.1.1 Applicant’s Response

A *Lighting Report* has been prepared by Metec and is submitted as part of the LRD application. The report confirms the proposed Block A development’s compliance with DLRCC’s requests regarding public lighting.

## Statement of Specific Information Requirements

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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.

The Applicant has considered the potential for the development to attract high numbers of EVs and electric bicycles. As such, 1 in 5 no. car parking spaces will be equipped with fully functional EV charging points and all other car parking spaces will be able to accommodate the fitting of EV charging if necessary. Further, charging points for electric bicycles will be provided in proximity to selected bicycle parking spaces.

A *Confirmation of Feasibility* has been received from Uisce Éireann in relation to the proposed development and is enclosed with the *Engineering Report* enclosed with this application.

A *Wind Microclimate Modelling Report* has been prepared by B-Fluid and is enclosed with the application. It confirms that the subject proposal will not generate any significant negative microclimatic impacts within the wider Sea Gardens masterplan development or surrounding areas.

The *Climate Action Report and Energy Statement* prepared by Metec demonstrates the proposed development's compliance with the climate action policies and objectives of Chapter 3 of the DLRCDP.

Having regard for the above, it is submitted that all issues relating to site services as raised in Item No. 8 of the LRD Opinion have been fully addressed in the LRD application documentation.

## 2.9 Item No. 9 – Environmental

Item No. 9 of the LRD Opinion relates to environmental considerations regarding the proposed development. DLRC's requests and the Applicant's responses are provided below.

### 2.9.1 Environmental

*“As requested by the Environmental Enforcement Department (report appended), the following documents to be submitted:*

- *Construction Environmental Management Plan*
- *Operational Waste Management Plan (to cover bins, bin storage, refuse collection etc).*
- *Noise Impact Assessment due to proximity to rail line and any required acoustic solutions provide as part of proposed design both to internal and external areas. See Noise Action Plan which was published last year.*

*The Planning Authority note the content of the submitted Environmental Impact Assessment (EIA) Technical Note, prepared by Atkins, which provides a preliminary assessment of the proposed development and considers that there will not be a requirement for an EIA. The Applicant should be confident that an EIAR is not required in this instance noting the potential impact of the proposals in conjunction with the wider Sea Gardens development. An EIA Screening Report should be prepared and submitted application to confirm this at LRD planning application stage”.*

#### 2.9.1.1 Applicant's Response

A *Construction Environmental Management Plan* and an *Operational Waste Management Plan* have been prepared by Atkins and are enclosed with the LRD planning application. An *Inward Noise Impact Assessment* has also been undertaken by AWN. The *Inward Noise Impact Assessment* has considered the proximity of the rail line and DLRC's recently published Noise Action Plan.

The *EIA Screening Report* prepared by Atkins considers the Block A proposal in conjunction with the overall Sea Gardens development and demonstrates that an EIA is not required for this application.

Having regard for the above, it is submitted that all environmental matters as raised in Item No. 9 of the LRD Opinion have been fully addressed in the LRD application documentation.

### 3 CONCLUSION

This *Statement of Specific Information Requirements* has been prepared in response to the LRD Opinion issued by DLRC on 7 May 2025, in relation to a proposed LRD at lands off the Dublin Road within the former Bray Golf Course lands, Bray, Co. Dublin.

This Report has responded to the 9 no. items set out by DLRC in their Opinion and referred to the relevant documentation submitted with this application when necessary. Considering the foregoing, it is submitted that this Report demonstrates that items raised in the LRD Opinion have been fully addressed.

# Appendix A

**Large-scale Residential Development Opinion**  
**Section 32D of the Planning and Development**  
**Act 2000, as amended**



<b>Applicant</b>	Shankill Property Investments Ltd
<b>Development Address</b>	Lands at Bray Golf Course lands, Bray, Co. Dublin
<b>DLR Reference</b>	PAC/LRD2/003/25
<b>Date of Receipt of Documentation</b>	21/03/2025
<b>Date of LRD Meeting</b>	14/04/2025
<b>Planning Authority Opinion Due</b>	12/05/2025

### **1.0 INTRODUCTION**

Having regard to the consultation that has taken place in relation to the proposed development, the purpose of this report is to form a recommended opinion as to whether or not the documentation submitted with the consultation request under Section 32B of the Planning and Development Act 2000, as amended (“the Act”) constitute a reasonable basis on which to make an application for permission for the proposed Large-scale Residential Development (LRD).

### **2.0 SITE LOCATION AND DESCRIPTION**

The subject site, which has a stated site area of 1.38ha, forms part of a larger landholding of c. 18ha known as ‘Sea Gardens’, part of which is under construction, part of which has been completed and part which is still to be developed. The subject site lands form part of Phase 1b of the wider Sea Gardens development as referred to by the Applicant. This 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. The northern part of the wider site (including the subject site) is located within the Dun Laoghaire Rathdown County Council (DLRCC) administrative area whilst the southern part of the wider site is located within the Wicklow County Council (WCC) administrative area.

The subject site itself is an undeveloped parcel of land located on the north-eastern part of the wider site, overlooking the Irish Sea to the east. The site is bounded to the north by Corke Abbey Valley Park, to the east by the Dublin to Rosslare railway line, to the south by an undeveloped parcel of land within the wider site (in WCC administrative area) and to the west by a developed section of the Sea Gardens development known as Shoreside Park (Phase 1a) which was permitted under ABP-311181-21. The area of Shoreside Park directly adjacent to the subject site comprises a mix of 2-storey houses and 3-storey duplexes. Coláiste Ráithín and Ravenswell Primary School are located further to the west of this new development.

The site is accessed from the Dublin Road (R761 Regional Road) via the Northern Access Road and the Southern Access Road which facilitates access from Castle Street via the Ravenswell Road. Bray DART Station is located 1km south of the subject site which also provides bus services. Bus stops are also located c. 1km away on Castle Street and Dublin

Road.

### 3.0 PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT

#### Applicant Summary Description of the Proposed Development

The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced townhouses with associated private terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant.

The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses.

The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; 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.

	Proposal	
<b>Site Area</b>	<b>Gross</b>	1.38 ha
	<b>Net</b>	1.18 ha (as stated)
<b>No. of Units</b>	159	
<b>Density</b>	<b>Gross</b>	115no. units per ha
	<b>Net</b>	134no. units per ha
<b>Floor Area</b>	<b>Gross</b>	<ul style="list-style-type: none"> <li>• Townhouses (only): 2,352 sq. m</li> <li>• Apartments (only): 17,044.10 sq. m</li> <li>• Total: 19,396 sq. m</li> </ul>
	<b>Childcare Facility</b>	N/A – already provided as part of the wider development under ABP-311181-21.
	<b>Residential Amenity Space</b>	c. 464 sq. m
<b>Plot Ratio</b>	<ul style="list-style-type: none"> <li>• Gross Site Area: 1.4</li> <li>• Net Site Area: 1.7</li> </ul>	
<b>Site Coverage</b>	<ul style="list-style-type: none"> <li>• Gross Site Area: 36%</li> <li>• Net Site Area: 42%</li> </ul>	
<b>Building Height</b>	<b>Apartments</b>	Block A1: 6-10 storeys Block A2: 7-11 storeys
	<b>Townhouses</b>	3-4 storeys
<b>Housing Mix</b>	<b>1 Bed Apartment</b>	48 (30%)
	<b>2 Bed Apartment</b>	58 (36%)
	<b>3 Bed Apartment</b>	44 (28%)

	<b>4 Bed Townhouse</b>	9 (6%)
<b>Dual Aspect</b>	100%	
<b>Part V (No. of Units)</b>	16 (2 within red line and 14 outside of red line already constructed under ABP-311181-21)	
<b>Public Open Space</b>	c. 3,639.5 sq. m Based on Gross Site Area: 26% Based on Net Site Area: 31%	
<b>Communal Open Space</b>	c. 1,874 sq. m Min. requirements 1,222 sq. m – as per Apartment Guidelines 2023.	
<b>Car Parking</b>	171 (ratio of 1.08 spaces per unit)	
<b>Motorcycle Parking</b>	8	
<b>Bicycle Parking</b>	365	

#### 4.0 PLANNING HISTORY

##### Subject Site

ABP Ref. ABP-311181-21: **SPLIT DECISION** issued on 09/12/2021 by An Bord Pleanála for a Strategic Housing Development comprising the construction of 591no. residential units, of which 515no. are apartments and 76no. are houses, childcare facility and associated site works.

Permission **REFUSED** for the apartment units Blocks A (166no. units) and B (191no. units) due to poor design.

Permission **GRANTED** for the remainder of the development including 106no. apartments, 52 no. duplexes, 76no. houses, childcare facility and all associated works.

ABP Ref. ABP-314686-22: Permission was **GRANTED** on 19/08/2024 by An Bord Pleanála for a revised Strategic Housing Development comprising change of use from former golf course, construction of 586 no. residential units (76 no. houses, 348 no. apartments, 162 no. Build to Rent apartments), creche and associated site works.

In granting permission, the ABP order that the proposed 12-storey element of Block B be reduced by three storeys through the removal of floors 7-9 (Condition 2) as well as other minor amendments.

LRD23A/0566:

Permission was **GRANTED** on 23/11/2023 by the Planning Authority for a Large-scale Residential Development comprising amendments to the permitted Strategic Housing Development (Ref. ABP-311181-21) to provide 4no. additional in-curtilage car parking spaces, extensions to the permitted length of adjacent public roadway in two areas to facilitate vehicular access to the proposed additional car parking spaces; and associated local revisions to permitted storm sewer network, public lighting and landscaping.

##### Adjacent Site(s) – Wicklow County Council Administrative Area

WCC Ref. 21869: A Part 8 application was submitted by WCC in July 2021as

part of the Bray Sustainable Transport Bridge Project for a proposed bridge and link road consisting of a two-lane public transport road 3.25m wide and variable width pedestrian, cyclist and shared path facilities. A new pedestrian boardwalk is proposed along the southern bank wall to link the existing walkway to the bridge crossing.

WCC Ref. 2560207:

A planning application was submitted to WCC on 24/03/2025 for a mixed-use development on lands south-west of the subject site with from part of the wider Sea Gardens development known as Phase 2. The application proposes 341 no. residential units (including houses, duplexes and apartments, commercial spaces (total gross floor area c. 10,778 sq.m), retail/retail services spaces (total gross floor area c. 8,155 sq.m), car and bicycle parking for residents and visitors, open spaces and associated supporting development infrastructure. This includes a proposed apartment building (E) up to 15 no. storeys.

The application is current under consideration by WCC and a decision is due by 18/05/2025.

## **5.0 RELEVANT PLANNING POLICY**

### **5.1 National Planning Policy**

- National Planning Framework (NPF) – Ireland 2040 (2018 – Under Review)
- Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region (EMRA) (2019)

### **Other National Policy / Guidance / Plans**

- Climate Action Plan (2024)
- National Sustainable Mobility Policy 2022 – 2025
- Bus Connects Project (National Transport Authority)
- Greater Dublin Area Cycle Network Plan (National Transport Authority: 2013)

### **5.2 Guidelines for Planning Authorities**

- Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)
- Regulation of Commercial Institutional Investment in Housing. Guidelines for Planning Authorities (2021)
- Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)
- Guidelines on Urban Development and Building Heights for Planning Authorities (2018)
- Design Manual for Urban Roads and Streets (2013 – Updated 2019)
- Architectural Heritage Protection Guidelines for Planning Authorities (re-issued 2011)
- The Planning System and Flood Risk Management Guidelines (2009)
- Childcare Facilities Guidelines for Planning Authorities (2001)

### **5.2 Dún Laoghaire Rathdown County Development Plan 2022-2028**

The majority of the application site is located under Zoning Objective 'A' of the Dún Laoghaire Rathdown County Development Plan 2022-2028 which seeks *'to provide residential development and improve residential amenity while protecting the existing residential amenities'*. A strip of land along the eastern boundary within the subject site is zoned Objective 'F' which seeks *'to preserve and provide for open space with ancillary active recreational amenities'*.

A section of the site along its southern boundary is located within an Area of Archaeological Potential.

The subject site is also covered with Special Local Objective 119 which states:

*'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'.*

The following policy is relevant to development of this type: -

#### Chapter 2: Core Strategy

- *Section 2.3.3 Housing Delivery*
- *Section 2.3.6 Housing Target for the Core Strategy*
- *Section 2.3.6.1 Housing Targets*
- *Section 2.3.6.2 Household Size*
- *Section 2.3.6.4 Housing Target for the Core Strategy*
- *Section 2.4.6 Phasing*
- *Section 2.6.2.1 (i) Policy Objective CS11: Compact Growth*
- *Section 2.6.2.2 Vacant Sites*

#### Chapter 3 – Climate Action

##### *Section 3.4 Achieving Sustainable Planning Outcomes*

- *Section 3.4.1 Energy Efficiency in Buildings*
- *Section 3.4.1.1 Policy Objective CA5: Energy Performance in Buildings*
- *Section 3.4.1.3 Policy Objective CA7: Construction Materials*
- *Section 3.4.1.4 Policy Objective CA8: Sustainability in Adaptable Design*
- *Section 3.4.2.1 Policy Objective CA10: Renewable Energy*
- *Section 3.4.3 Decarbonising Motorised Transport*
- *Section 3.4.3.2 Policy Objective CA17: Electric Vehicles*
- *Section 3.4.4 Urban Greening*
- *Section 3.4.4.1 Policy Objective CA18: Urban Greening*

#### Chapter 4 – Neighbourhood – People, Homes and Place

- *Section 4.1.1 Overarching Policy Objective PHP1*

##### *Section 4.2 People*

- *Section 4.2.1 Sustainable Communities and Neighbourhood Infrastructure*
- *Section 4.2.1.1 Policy Objective PHP2: Sustainable Neighbourhood Infrastructure*
- *Section 4.2.1.2 Policy Objective PHP3: Planning for Sustainable Communities*
- *Section 4.2.1.3 Policy Objective PHP4: Villages and Neighbourhoods*
- *Section 4.2.1.4 Policy Objective PHP5: Community Facilities*
- *Section 4.2.1.5 Policy Objective PHP6: Childcare Facilities*

##### *Section 4.3 Homes*

- *Section 4.3.1 Delivering and Improving Homes*
- *Section 4.3.1.1 Policy Objective PHP18: Residential Density*
- *Section 4.3.1.3 Policy Objective PHP20: Protection of Existing Residential Amenity*
- *Section 4.3.2 Housing Choice*
- *Section 4.3.2.1 Policy Objective PHP25: 'Housing for All – A New Housing Plan for Ireland, 2022'*
- *Section 4.3.2.2 Policy Objective PHP26: Implementation of the Housing Strategy*
- *Section 4.3.2.3 Policy Objective PHP27: Housing Mix*
- *Section 4.3.2.6 Policy Objective PHP30: Housing for All*
- *Section 4.3.2.7 Policy Objective PHP31: Provision of Social Housing*

##### *Section 4.4 Place*

- *Section 4.4.1 Quality Design & Placemaking*
- *Section 4.4.1.1 Policy Objective PHP35: Healthy Placemaking*
- *Section 4.4.1.2 Policy Objective PHP36: Inclusive Design & Universal Access*

- Section 4.4.1.3 Policy Objective PHP37: Public Realm Design
- Section 4.4.1.6 Policy Objective PHP40: Shared Space Layouts
- Section 4.4.1.7 Policy Objective PHP41: Safer Living Environment
- Section 4.4.1.8 Policy Objective PHP42: Building Design & Height
- Section 4.4.1.10 Policy Objective PHP44: Design Statements

#### Chapter 5 – Transport and Mobility

##### Section 5.4 Integrated Land use and Transport

- Section 5.4.1 Policy Objective T1: Integration of Land Use and Transport Policies

##### Section 5.5 Promoting Modal Change

- Section 5.5.1 Policy Objective T4: Development of Sustainable Travel and Transport.

##### Section 5.6 Promoting Active Travel: Cycling and Walking

- Section 5.6.1 Policy Objective T11: Walking and Cycling

##### Section 5.7 Demand Management and Travel Planning

- Section 5.7.2 Policy Objective T17: Travel Plans
- Section 5.7.3 Policy Objective T18: Car Sharing Schemes
- Section 5.7.4 Policy Objective T19: Carparking Standards

##### Section 5.8 Road and Street Network

- Section 5.8.4 Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits
- Section 5.8.5 Policy Objective T27: Traffic Noise
- Section 5.8.6 Policy Objective T28: Road Safety
- Section 5.8.8 Policy Objective T30: Street Lighting

#### Chapter 8 – Green Infrastructure and Biodiversity

##### Section 8.3 Green Infrastructure

- Section 8.3.1 Policy Objective GIB1: Green Infrastructure Strategy

##### Section 8.4 Landscape

- Section 8.4.1 Policy Objective GIB2: Landscape Character Areas

##### Section 8.7 Biodiversity

- Section 8.7.1 Introduction
- Section 8.7.1.1 Policy Objective GIB18: Protection of Natural Heritage and the Environment
- Section 8.7.1.2 Policy Objective GIB19: Habitats Directive
- Section 8.7.1.4 Policy Objective GIB21: Designated Sites
- Section 8.7.1.5 Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance
- Section 8.7.1.8 Policy Objective GIB25: Hedgerows
- Section 8.7.1.9 Policy Objective GIB26: Geological Sites
- Section 8.7.1.11 Policy Objective GIB28: Invasive Species
- Section 8.7.1.12 Policy Objective GIB29: Nature Based Solutions

#### Chapter 9 – Open Space, Parks and Recreation

##### Section 9.2 Open Space and Parks

- Section 9.2.1.2 Policy Objective OSR2: Hierarchy of Parks and Public Open Space
- Section 9.2.1.4 Policy Objective OSR4: Public Open Space Standards

##### Section 9.3 Open Space and Recreation

- Section 9.3.1.3 Policy Objective OSR7: Trees, Woodland and Forestry

##### Section 9.4 Sports and Play

- Section 9.4.1.5 Policy Objective OSR13: Play Facilities and Nature Based Play

#### Chapter 10 – Environmental Infrastructure and Flood Risk

##### Section 10.2 Water and Wastewater

- Section 10.2.2 Water and Wastewater – Policy Objectives
- Section 10.2.2.3 Policy Objective EI3: Wastewater Treatment Systems
- Section 10.2.2.4 Policy Objective EI4: Water Drainage Systems
- Section 10.2.2.6 Policy Objective EI6: Sustainable Drainage Systems

- *Section 10.2.2.9 Policy Objective EI9: Drainage Impact Assessment*

#### *Section 10.3 Waste*

- *Section 10.3.2 Waste - Policy Objectives*
- *Section 10.3.2.1 Policy Objective EI11: Resource Management*
- *Section 10.3.2.2 Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse*

#### *Section 10.4 Pollution*

- *Section 10.4.1 Policy Objective EI14: Air and Noise Pollution*
- *Section 10.4.2 Policy Objective EI15: Light Pollution*

#### *Section 10.7 Flood Risk*

- *Section 10.7.2 Policy Objective EI22: Flood Risk Management*

### *Chapter 11 – Heritage and Conservation*

#### *Section 11.3 Archaeological Heritage*

- *Section 11.3.1 Record of Monuments and Places*
- *Section 11.3.1.1 Policy Objective HER1: Protection of Archaeological Heritage*
- *Section 11.3.1.2 Policy Objective HER2: Protection of Archaeological Material in Situ*

### *Chapter 12 – Development Management*

#### *Section 12.1 Introduction*

- *Section 12.1.1 Planning Process*
- *Section 12.1.1.2 Design Statements*
- *Section 12.1.1.3 Landscape Plans*
- *Section 12.1.2 Impacts on the Environment*
- *Section 12.1.2.1 Environmental Impact Assessment*
- *Section 12.1.2.2 Appropriate Assessment*
- *Section 12.1.2.3 Ecological Impact Assessment*

#### *Section 12.2 Climate Action*

- *Section 12.2.1 Built Environment*
- *Section 12.2.6 Urban Greening*

#### *Section 12.3 Neighbourhood - People, Homes and Place*

- *Section 12.3.1 Quality Design*
- *Section 12.3.1.1 Design Criteria*
- *Section 12.3.2 Sustainable Neighbourhood Infrastructure*
- *Section 12.3.2.2 Sustainable Neighbourhood Infrastructure – Future Provision (i) New Residential Communities*
- *Section 12.3.2.3 Community Facilities*
- *Section 12.3.2.4 Childcare Facilities*
- *Section 12.3.3 Quantitative Standards for All Residential Development*
- *Section 12.3.3.1 Residential Size and Mix*
- *Section 12.3.3.2 Residential Density*
- *Section 12.3.4 Residential Development – General Requirements*
- *Section 12.3.4.1 Road and Footpath Requirements*
- *Section 12.3.4.2 Habitable Rooms*
- *Section 12.3.4.4 Phased Development*
- *Section 12.3.4.5 Management Companies and Taking in Charge*
- *Section 12.3.4.7 Refuse Storage and Service*
- *Section 12.3.5 Apartment Development*
- *Section 12.3.5.1 Dual Aspect in Apartments*
- *Section 12.3.5.2 Separation Between Blocks*
- *Section 12.3.5.3 Internal Storage and External Storage*
- *Section 12.3.5.5 Minimum Apartment Floor Areas*
- *Section 12.3.5.6 Additional Apartment Design Requirements*
- *Section 12.3.8 Housing for All*
- *Section 12.3.8.1 Age Friendly Housing*

#### *Section 12.4 Transport*

- *Section 12.4.2 Traffic and Transport Assessment*

- *Section 12.4.3 Travel Plans*
- *Section 12.4.4 Street Lighting*
- *Section 12.4.5 Car Parking Standards*
- *Section 12.4.5.1 Parking Zones*
- *Section 12.4.5.2 Application of Standards*
- *Section 12.4.5.2 (i) Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5)*
- *Section 12.4.5.3 Car Parking –General*
- *Section 12.4.5.6 Residential Parking*
- *Section 12.4.5.7 Parking and Loading Bays*
- *Section 12.4.6 Cycle Parking*
- *Section 12.4.6.1 Requirements for New Development*
- *Section 12.4.6.2 Cycle Parking Assessment Criteria*
- *Section 12.4.7 Motorcycle Parking*
- *Section 12.4.8 Vehicular Entrances and Hardstanding Areas*
- *Section 12.4.8.1 General Specifications*
- *Section 12.4.9 Design of Underground and Multi-Storey Car Parks*
- *Section 12.4.10 Childcare Facilities – Parking / Access*
- *Section 12.4.11 Electrically Operated Vehicles*
- *Section 12.4.13 Emergency Access*

*Section 12.7 Green Infrastructure and Biodiversity*

- *Section 12.7.1 Green Infrastructure*
- *Section 12.7.2 Biodiversity*
- *Section 12.7.3 Sensitive Landscapes and Site Features*

*Section 12.8 Open Space and Recreation*

- *Section 12.8.1 Landscape Design Rationale*
- *Section 12.8.2 Open Space Categories for Residential Development*
- *Section 12.8.3 Open Space Quantity for Residential Development*
- *Section 12.8.3.1 Public Open Space*
- *Section 12.8.3.2 Communal Open Space*
- *Section 12.8.3.3 Private Open Space*
- *Section 12.8.5 Public Open Space – Quality*
- *Section 12.8.5.1 Design*
- *Section 12.8.5.2 Accessibility, Permeability, Security and Privacy*
- *Section 12.8.5.3 Communal Open Space – Quality*
- *Section 12.8.5.4 Roof Gardens*
- *Section 12.8.6 Biodiversity and SuDS in both Public and Communal Open Space*
- *Section 12.8.6.1 Biodiversity*
- *Section 12.8.6.2 SuDS (Sustainable Drainage Systems)*
- *Section 12.8.6.3 Green Roofs / Blue Roofs*
- *Section 12.8.7 Private Amenity Space – Quality Standards*
- *Section 12.8.7.1 Separation Distances*
- *Section 12.8.7.2 Boundaries*
- *Section 12.8.8 Financial Contributions in Lieu of Open Space*
- *Section 12.8.9 Play Facilities for Apartments and Residential Developments*
- *Section 12.8.11 Existing Trees and Hedgerows*

*Section 12.9 Environmental Infrastructure*

- *Section 12.9.2 Noise Pollution and Noise Nuisance*
- *Section 12.9.4 Construction Management Plans*
- *Section 12.9.5 Hours of Construction*
- *Section 12.9.6 New Development / Change of Use - Environmental Impacts*
- *Section 12.9.8 Telecommunications*
- *Section 12.9.10 Public Lighting*
- *Section 12.9.10.1 Light Pollution*
- *Section 12.9.10.2 Street Lighting*
- *Section 12.10 Drainage, Flood Risk and Coastal Erosion*
- *Section 12.10.1 Flood Risk Management*

### Section 12.11 Heritage

- Section 12.11.1 Archaeological Heritage

### Chapter 13 – Land Use Zoning Objectives

#### Section 13.1 Land Use Zoning Objectives

- Section 13.1.2 Transitional Zonal Areas
- Section 13.1.10 Appropriate Assessment

### Appendix

- Appendix 2: Housing Strategy and HDNA
- Appendix 3: Development Management Thresholds
- Appendix 4: Heritage Lists
- Appendix 5: Building Height Strategy
- Appendix 6: Waste Management Guidelines
- Appendix 7: Sustainable Drainage System Measures
- Appendix 8 Landscape Assessment Study and Landscape/Seascape Character Areas
- Appendix 9: Ecological Network
- Appendix 14: Green Infrastructure Strategy
- Appendix 15: Strategic Flood Risk Assessment

### **5.3 Other Dún Laoghaire-Rathdown County Council Guidance**

- *Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019 – 2024, as referenced in Section 3.3.1 Policy Objective CA4: Dún Laoghaire Rathdown County Council Climate Change Action Plan 2019-2024 (DLR CCAP) of the County Development Plan 2022-2028 (replaced by Dún Laoghaire Rathdown County Council Climate Change Action Plan 2024-2029).*
- *DLR Biodiversity Action Plan 2021-2025, as referenced in Section 8.7.1.3 Policy Objective GIB20: Biodiversity Plan of the County Development Plan 2022-2028.*
- *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018), as referenced in Section 12.4.6 of the County Development Plan 2022-2028.*
- *DLR County Biodiversity Action Plan 2021-2025 as referenced in Section 8.7.1.2 Policy Objective GIB19: Habitats Directive of the County Development Plan 2022-2028.*

### **6.0 SECTION 247 CONSULTATION ('STAGE 1')**

A 'Stage 1' Section 247 Meeting (Ref. PAC/LRD1/032/24) took place between the Prospective Applicant and the Planning Authority on 13/01/2025. The record of this meeting is included as Appendix A, in accordance with the requirements of Article 16A(8) of the Planning and Development Regulations 2001, as Amended ("the Regulations").

### **7.0 THE LRD MEETING ('STAGE 2')**

A Section 32C of the Act LRD Meeting took place via Microsoft Teams on 14/04/2025 between representatives of the Prospective Applicant, and Dún Laoghaire-Rathdown County Council (DLRCC).

An agenda was issued by DLRCC prior to the meeting as detailed below: -

1. Introductions/Purpose of the meeting
2. Proposed Development Presentation
3. Planning (including height, scale, massing, and visual impact, and receiving context, shadowing & sunlight & daylight impacts, unit mix (& 3-bed configurations), density etc.).
4. Parking, traffic and receiving road network
5. Drainage
6. Parks and Landscaping
7. Public Lighting
8. AOB

In accordance with the requirements of Article 16A(8) of the Regulations, the Record of the meeting is attached to this Report as Appendix B.

## **8.0 APPRAISAL**

Based on the entirety of the information before the Planning Authority, it would appear that the proposed development falls within the definition of LRD, as set out in Section 2 of the Act.

The information and submissions, including the documentation submitted by Prospective Applicants, and the discussions which took place at the Section 247 Meeting / LRD Meeting (outlined in Appendix A & B) between DLRCC, and the Prospective Applicant and Prospective Applicant's Agents, have been considered.

### **Conclusion**

The Planning Authority recommends a notice be served on the Prospective Applicant, pursuant to Section 32D of the Act, stating that it is of the opinion that the documentation submitted with the consultation request under section 32B of the Act does constitute a reasonable basis on which to make an application for permission for the proposed LRD.

## **9.0 RECOMMENDED OPINION**

The Planning Authority refers to your request pursuant to section 32B of the Act. Section 32D of the Act provides that the Planning Authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the consultation process the Planning Authority is of the opinion that the documentation submitted constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Pursuant Section 32D of the Act, the Planning Authority is of the opinion the documents submitted **do constitute a reasonable basis on which to make the application**, however, comments and concerns are noted in respect of the following areas, and the following and specific information should be addressed in any LRD planning application for development. The Prospective Applicant is requested to provide: -

### **1. PLANNING**

#### **Density**

Justification in relation to the proposed density, noting the proximity of the application site to the Bray train station and having regard to the provisions of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) and the Sustainable Urban Housing: Design Standards for New Apartments (2023) and the Dún Laoghaire Rathdown County Development Plan 2022-2028, in particular, Policy Objective PHP18: Residential Density and PHP20: Protection of Existing Residential Amenity.

In terms of accessibility the application site can be considered as a 'Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods' as defined in the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) whereby residential densities in the range of 50 – 150no. units per ha (net) shall generally be applied. The submitted scheme provides a net density of 134no. units per ha based on the net developable area (1.18ha).

Details of how the proposed net site area has been calculated having regard for the guidance set out in Appendix B: Measuring Residential Density of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) should be provided.

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.

## **Height**

The Planning Authority have concerns regarding the height of the proposed apartment blocks. Strong justification to be provided for proposed building height of Block A1 and A2 in this coastal location having regard to the Policy Objective PHP42: Building Design & Height, Appendix 5: Building Height Strategy (Table 5.1, in particular) of the Dún Laoghaire Rathdown County Development Plan 2022-2028 and Guidelines on Urban Development and Building Heights for Planning Authorities (2018).

The Planning Authority note the building height of Block A was reduced from 12 storeys to 9-storeys by An Bord Pleanála in the determination of the previous application on site (ABP Ref. ABP-314686-22 refers). It is also noted that 15 storey apartment block on the Wicklow Co.Co. side of the scheme that is currently being decided on (WCC Ref. 2560207). If granted permission, this may set a precedent for increased height along the coast in this location.

It is also noted that changes to the permitted Block B (under ABP Ref. ABP-314686-22) are intended to be sought at a later stage by the Applicant.

Confirmation is required to demonstrate that the proposed development is capable of being acceptable in its own right as well as part of a larger future development. The Applicant is requested to submit contextual elevations and views of the proposed development in the context of what is currently permitted under ABP Ref. ABP-314686-22 rather as well as the context of what is currently proposed for Phase 2 and potential futures changes to Block B (Phase 1B).

## **Design & Layout**

Further justification is required to satisfy the concerns regarding the change in scale and heights between the proposed apartment blocks and the intervening townhouses. Verified views and photomontages should be provided to demonstrate the resulting visual impact from the east and west of the site.

## **Housing Mix**

As per current proposals, evidence to demonstrate that the unit mix proposed is generally in accordance with Policy Objective PHP 27: Housing Mix and Table 12.1 of the Dún Laoghaire Rathdown County Development Plan 2022-2028 and the Sustainable Urban Housing: Design Standards for New Apartments (2023). The LRD Stage 3 Application should also include how the proposed unit mix will accord with the overall Sea Gardens development.

## **Materials**

A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the area and that are suitable for coastal location. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the unit typologies in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2023).

## **Visual Impact**

A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, preferably including winter views, that would assist in understanding the relationship between the proposed development and its context (including the permitted development granted under ABP Ref. ABP-313252-22).

### **Housing Quality Assessment**

A Housing Quality Assessment which provides the specific information regarding the proposed unit typologies required by the Dún Laoghaire Rathdown County Development Plan 2022-2028 and the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) and Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).

### **Storage**

Details of the bulky storage provision for the apartment blocks having regard for Section 12.3.5.3 Internal Storage and External Storage of the Dún Laoghaire Rathdown County Development Plan 2022-2028.

## **2. TRANSPORTATION**

A Traffic Impact Assessment and swept path drawings should be provided.

### **Cycle Parking**

The overall quantity of cycle parking to serve the residential element should be in accordance with the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024), 1 space per bedroom for long stay, 1 space per 5 units for visitor parking. A Cycle Audit should be provided.

DLR standard is Sheffield stand, the remaining cycle parking above requirement minimums may be of the Applicant's choosing, provided it is well located across the site with high quality accessibility and passive surveillance.

The provision of visitor cycle parking should be re-examined to capitalise on the location and the links at the site with the placement of the cycle parking.

### **Car Parking**

Proposed parking ratio (1:1.08) is noted. Further consideration / justification is required in relation to the provision of car parking. **Further reduction** in the provision of car parking to serve the residential element of development should be considered having regard for the principles outlined within the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024).

The following shall also be demonstrated: -

- 1 in 5no. car parking spaces to be equipped with fully functional EV charging points
- All car parking spaces to be future proofed to accommodate fitting of EV charging points without the need for intrusive works.
- Provision of motorcycle parking in accordance with the Dún Laoghaire Rathdown County Development Plan 2022-2028.

NOTE: In accordance with SPPR 3 of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024), the maximum car parking standards do not include bays assigned for use by 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.

## **3. OPEN SPACE & LANDSCAPING**

### **Public Open Space Provision**

Evidence (including a colour-coded map) to demonstrate that the proposed development is in accordance with the standards for public, communal and private open space set out by the relevant provisions under the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) and the Sustainable Urban Housing: Design Standards for New Apartments (2023).

The information must include a quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc. having regard for the public / communal open space requirements set out in the Dún Laoghaire Rathdown County Development Plan 2022-2028.

Details of the proposed levels and gradients of any public / communal open space should be submitted for consideration as well as access routes. Details of connections into Corke Abbey and protection of hedgerows trees at the northern end of the site should be provided. The Greenway link should be at least 4m in width.

Cross sections and further landscaping details of the proposed development should be provided.

#### **Private Amenity Space**

Details of mitigation against potential overlooking of private amenity spaces of town houses from proposed balconies apartments, if required.

#### **4. CHILDCARE**

Justification to be provided as to why a dedicated childcare facility is not required as part of the subject application and that the quantum, size and form of the childcare facility granted under ABP-311181-21 is appropriate to meet the needs of future residents in the form of a childcare facility capacity assessment.

#### **5. DAYLIGHT / SUNLIGHT / SHADOW ASSESSMENT**

A comprehensive daylight / sunlight / shadow assessment demonstrating the quality and performance of the proposed development as well as the impact of the proposed development on the surrounding context, particularly the potential impact of overshadowing of apartment blocks onto terraced townhouses.

#### **6. BIODIVERSITY**

A Report that addresses any concerns raised by the Biodiversity Officer (full report appended), in particular the application should be supported by up-to-date surveys as per *CIEEM Advice Note: Lifespan of Ecological reports and Surveys*.

The following requests should also be adhered to:

- Landscape architect should liaise with the Ecologist when it comes to planting for the development.
- Dark zones in planting to be provided along site boundaries.
- All biodiversity measures set out in the EcIA should also be included in the CEMP.

#### **7. DRAINAGE PLANNING**

A Report that addresses the concerns of the Drainage Planning Department (full report appended). The Planning Authority have considered the commentary provided by the Drainage Planning Department and concur with the recommendations made.

#### **8. SITE SERVICES**

Provision of a public lighting layout and report. The public lighting layout should tie in with rest of Sea Gardens development and should be co-ordinated with the landscape layout to avoid conflicts with trees. Proposals should avoid light overspill – only the paths should be lit.

Submission of a Taking in Charge Map.

The PA advised the Applicant to be conscious of the fact that this development may attract a high percentage of EV cars. The applicant was advised to overestimate this rate

when applying to the ESB in order to be sure of being capable of satisfying the future demand.

It has been advised consideration is given to providing electric charging facilities for bicycles at the bicycle parking stands. Also, it is considered that this development may attract a high percentage of EV cars which should be taken into consideration when applying to the ESB in order to be sure of being capable of satisfying the future demand.

A letter from Uisce Éireann confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no more than 6 months before the date of lodgement of the LRD planning application.

Submission of Wind and Pedestrian Comfort Study which addresses the impact of the proposals on the usability of the surrounding development particularly for pedestrians and cyclists etc.

A report detailing how the proposed development accords with the objectives and policies set out in Chapter 3 – Climate Action of the Dún Laoghaire Rathdown County Development Plan 2022-2028, in achieving a sustainable planning outcome to include any proposals they may have for e.g. passive housing, renewable energy, solar and wind energy infrastructure, district heating etc.

## 9. ENVIRONMENTAL

As requested by the Environmental Enforcement Department (report appended), the following documents to be submitted:

- Construction Environmental Management Plan
- Operational Waste Management Plan (to cover bins, bin storage, refuse collection etc).
- Noise Impact Assessment due to proximity to rail line and any required acoustic solutions provide as part of proposed design both to internal and external areas. See Noise Action Plan which was published last year.

The Planning Authority note the content of the submitted Environmental Impact Assessment (EIA) Technical Note, prepared by Atkins, which provides a preliminary assessment of the proposed development and considers that there will not be a requirement for an EIA. The Applicant should be confident that an EIAR is not required in this instance noting the potential impact of the proposals in conjunction with the wider Sea Gardens development. An EIA Screening Report should be prepared and submitted application to confirm this at LRD planning application stage.

Draft Opinion above as recommended by <b>Maeve Cronin</b> , Executive Planner
Draft Opinion above, as reviewed by <b>Stephen McDermott</b> , Senior Executive Planner
Opinion endorsed by <b>Miguel Sarabia</b> , A/Senior Planner
The entirety of this report, opinion, and appendices is authorised to be provided to the prospective LRD application under; S32D(1) of the Planning and Development Act, 2000, as amended.

**APPENDIX A**  
**Record of the Section 247 Meeting (Stage 1)**

**Ref:** PAC/LRD1/032/24

**Stage:** 1

**Location:** Former Bray Golf Club Lands

**Proposal:** Planning application for Block A consisting of a residential development comprising c.148 no units

**Meeting date:** 13th Jan 2024

**Meeting time:** 11am

**Applicant:** Shankill Property Investments Limited

**Agent:** RPS

**Meeting:** Microsoft Teams

**Agenda**

1. Introductions/Purpose of the meeting

2. Proposed Development Presentation
3. Planning (including height, scale, massing, and visual impact, and receiving context, shadowing & sunlight & daylight impacts, unit mix (& 3-bed configurations), density etc.).
4. Parking, traffic and receiving road network
5. Drainage
6. Parks and Landscaping
7. Public Lighting
8. AOB

**For DLR**

Stephen Mc Dermott (Senior Executive Planner), Johanne Codd (Executive Engineer, Water and Drainage), Joao Brescia (Executive Engineer, Water and Drainage), Dara O' Daly (Executive Parks Superintendent), Deirdre O'Riordan (Executive Parks Superintendent), Tom Kilbride (Executive Engineer, Transportation Planning), Maeve Cronin (Executive Planner), Brendan Lynch (Staff Officer, Planning Secretariat), Sam Geoghegan (Senior Staff Officer, Planning Secretariat), Des Mc Hugh (Assistant Staff Officer, Planning), Miguel Sarabia (Senior Planner).

**Applicant**

Cathal Dalton (Ballymore), Ken Sweeney (Ballymore), Daniel Mulligan (Howells Architects), Stephen Jackson (Howells Architects), Carl Mogensen (RPS Planning), Helena Gavin (RPS Planning), Garry Hanratty.

**Record**

The applicant gave a brief background and history of the site.

The proposal is for Block A. An LRD meeting was previously held in June 2023. An Bord Pleanála has granted the previous SHD.

The PA asked if the current proposal was because of concerns over litigation or if it is a different design. The applicant confirmed that it is a different design.

The applicant said that the site has two boundaries, Dún Laoghaire-Rathdown to the north and Wicklow to the south.

They say the site is very central, sitting beside Bray town centre and the railway line.

A large proportion of phase 1 has already been built.

The applicant referred to the seafront blocks and the undulating skyline which lends itself to a more interesting skyline. 2

The applicant said that the proposal will include a variety of height and massing, in a deco style.

The applicant says that their scheme will promote a mobile lifestyle, integrating with the local amenities in the seaside area, like cycling and dog walking.

The applicant noted the scheme will be a mix of apartments and own door units.

The proposed mix is for 30% 1 bed, 32% 2 bed, 32% 3 bed and 6% 4 bed units. This is a move toward a for-sale model, with less 1 bed units and more family sized units.

The proposal maximises dual aspect and views of the sea and the mountains.

The applicant said that there will be a strong ground floor activation.

The original proposal was for 162 for rent units, updated in 2023 to 129 private sale units. The current proposal is for 148 private sale units. 5/6 storey increasing to 9 and 10 storey in the east of the scheme.

There are 2 and 3 bed duplex units and 4 bed townhouses proposed.

Activation on Eastern part of the site.

Mix of 1, 2 and 3 beds on upper floors.

The houses to the west of the site have car ports and front door entrances.

Townhouses on eastern side have a podium.

Stepped terraced landscaping which covers the car parking behind it.

Side elevation, curved balconies.

6 Storeys west, almost 100% dual aspect.

There is a Creche proposed on the Wicklow site.

Adhering to Dún Laoghaire-Rathdown public open space standards.

The applicant notes there will be storage containers for residents on mezzanine level.

Applicant said that the car parking entrance has been moved, so that traffic has less distance to travel within the site.

Regarding the communal amenity, the applicant said that there is 1,901m<sup>2</sup> allocated (1,060 m<sup>2</sup> required).

There is increased Public open space of 5,641m<sup>2</sup> (4,629m<sup>2</sup> required).

The applicant said that the parking ratio proposed is 1.1, with 152 residential parking spaces and 15 visitor spaces.

Regarding the Part V, the PA asked the applicant to ensure that the red line of their application is correct. They should consider including the Part V blocks in their application. The applicant will need to show the details of their Part V proposal to ensure their application is valid.

The PA asked if the Block B SHD is to be changed? The applicant replied that there is a masterplan for the site in Dún Laoghaire-Rathdown and in Wicklow. They are looking for consistent height above seafront and waterfront.

The PA stressed that it would be important to show the proposed development in the full context of the overall area - ie all blocks in this masterplan.

The PA expressed concern about the proposed height of this proposal and asked the applicant to provide justification for it.

The applicant confirmed the height as ground floor with 9 floors above.

The PA noted this was taller than the previous SHD, which was 6 storeys.

The PA expressed concern that the site would look bookended. The applicant replied that the top storey of the townhouses could be pushed further west, giving the appearance of more height. 3

The PA asked if the applicant would consider increasing the height of the duplexes and reducing the apartment heights?

The applicant confirmed the duplex units will have private open space.

The PA asked how soon until the application? The applicant replied that it would be 6-8 weeks.

The applicant said the density on the site could be 99 dph, depending on where the red line of the site is drawn.

The PA noted that increasing the density on the site would be viewed positively.

### **Transport**

The PA noted that the car parking ratio is 1.1 spaces per unit, including the visitor parking, with 2 storeys car parking, 74 spaces on the ground floor.

The PA said that the cycle parking is heavily reliant on stacked cycle parking. The DLR standard is 1 Sheffield stand per unit and 1 per 5 units for visitors, allowing equity of use. Provision above this level is at the choosing of the applicant.

The PA would like to see provision for cargo bike parking, childrens bikes etc.

The PA pointed out that the site is well situated, being less than 1 kilometre from Bray DART station, and that a reduction in parking from 1.1 would be appropriate.

PA asked the applicant to ensure that the proposal works with swept path.

The PA noted that the north to south linear link is open and is very important.

PA asked the applicant to ensure that there is a 4-metre width connection that connects well with the other schemes and the parks.

The applicant said that their numbers of Sheffield and Cargo stands are very close to those requested. They will ensure that they meet the standards required for cycle parking.

Regarding car parking, the applicant said that they are in line with the Development plan, in fact slightly lower. The PA replied that a further reduction would be appropriate in line with the Compact Settlement Guidelines.

The applicant said they will be in contact with our Transport planning dept and will provide swept path analysis and bicycle parking calcs.

### **Parks**

The PA noted the north to south greenway link along the sea is very important.

The applicant stated that connections were being developed into Corke Abbey.

The PA noted that multiple connections through the scheme are important.

The PA noted it would be important to maintain the hedgerows and the links should be set back from the sea/wetland areas.

The PA noted the route should be at least 4 metres wide for pedestrians and cyclists, possibly 5 metres wide.

The applicant is to ensure that appropriate tree protection is in place.

The PA note that blocks A1 and A2 look very substantial.

The PA asked if some of the play areas could be consolidated into one larger one.

The PA asked if a landscape architect had been engaged. The applicant confirm they have engaged one.

The PA reiterated that they would like to see a consolidated play strategy.

The applicant confirms there will be communal space on the deck of the podium, terraces on the houses, and balconies on the apartments. 4

**Drainage**

The PA asked if there is a flood risk assessment, they referenced the stream to the north.

The applicant referred to the SHD1 and SHD2 and said that the flood mapping will be redone for the current application.

The applicant confirmed that there will be green roofs where suitable in accordance with current DLR policy.

**Public Lighting**

The PA noted that there is no lighting design submitted, the lighting design will have to be consistent.

The PA have provided their own comments to the planner.

Regarding the height of the proposal, the PA noted that An Bord Pleanála reduced the height of a previous application from 12 to 9 storeys. The PA note the applicant will have to make a case for the heights they are proposing.

The PA note that the applicant should demonstrate how the residential car parking is compliant with the Compact Settlement Guidelines.

The PA raised a concern with the car ports at ground floor level of the duplex units and asked the applicant to consider exploring different design solutions.

The PA noted that the applicant should be careful to ensure that the footprint of the design should not overlap the zoning on the east.

The PA requested the daylight/sunlight reports.

The applicant said that balancing height vs density is important for them. They welcomed a site visit by the PA.

The PA reiterated that they are supportive of development on the site.

## **APPENDIX B**

### **Record of the LRD Meeting (Stage 2) as per Section 32C(4) of the Planning and Development Act 2000, as Amended**

#### **Meeting Record**

**Ref:** PAC/LRD2/003/25

**Stage:** 2

**Location:** Lands within former Bray Golf Course, off Ravenswell Road, Bray

**Proposal:** The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced townhouses with associated private terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses. The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; 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.

**Meeting date:** 11am Monday 14-April-2025 online via Microsoft Teams

**Applicant:** Shankill Property Investments Ltd.

**Agent:** RPS Consulting Engineers Limited

**Meeting:** Microsoft Teams

#### **For DLR:**

Miguel Sarabia (Senior Planner, Planning and Economic Development), Stephen McDermott (Senior Executive Planner, Planning and Economic Development), Maeve Cronin (Executive Planner, Planning and Economic Development), Tom Kilbride (Executive Engineer, Transportation Planning), Ultan Downes (Environment and Climate Change), Neill Molloy (Parks), Dara O'Daly (Executive Parks Superintendent, Parks), Deirdre O'Riordan (Executive Parks Superintendent), Norman Kelly (Parks), Mary Hegarty (Senior Executive Engineer Public Lighting), Jenny Neff (Ecological Advisory and Consultancy Services), Sean McGrath (Senior Engineer, Traffic and Road Safety), Joao Brescia (Executive Engineer, Water & Drainage), Sam Geoghegan (Planning Secretariat), Brendan Lynch (Planning Secretariat), Des McHugh (Planning Secretariat)

#### **For Applicant:**

Cathal Dalton (Ballymore), Ken Sweeney (Ballymore), Kieran Rush (Ballymore), Daniel Mulligan (Howells), Stephen Jackson (Howells), Donagh Kelly (Landscape Architect), Garry Hanratty (Atkins), Peter Foley (Atkins), Helena Gavin (RPS), Carl Mogensen (RPS),

## **Agenda**

1. Introductions/Purpose of the meeting
2. Proposed Development Presentation
3. Planning (including height, scale, massing, and visual impact, and receiving context, shadowing & sunlight & daylight impacts, unit mix (& 3-bed configurations), density etc.).
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6. Parks and Landscaping
7. Public Lighting
8. AOB

## **Record**

The applicant opened with a brief history and overview of the site at the Former Bray Golf Course.

The applicant then gave a presentation on their proposal:

They now see the scheme as a build to sell development rather than a buy to let development, so they have revised the plans at Block A, which has already been granted permission.

The applicant described their proposed development which they say will have a large expanse of space around it.

The apartment blocks will be 6/7 storeys high at the duplexes and 10/11 storeys in the east at the coast, with 4 storey townhouse blocks in between.

The applicant wants to increase the massing at the waterfront locations.

The density of this proposal is 85 units per ha.

The applicant states that they are attempting to achieve active frontage on all facades.

The townhouses will be own door units and the layout will be conducive to increased visual surveillance.

The central podium area is 31m by 61m.

The applicant described the facades of the blocks – brick, concrete sills, aluminium windows and balconies.

The applicant notes that there will be 99% dual aspect across the scheme.

The applicant notes that phase 1 is complete except for Block A (in DLRCOCO) and Block B (in Wicklow COCO).

## Transport

The applicant confirmed that the car parking ratio will be 1.08.

The PA spoke about parking provision reduction and noted that a lower provision would be appropriate due to the proximity to the Dart and the bus corridor. The PA asked the applicant to clarify and justify their parking provision with regard to SPPR3 of the Compact Settlement Guidelines.

The PA noted that cycle parking should be in accordance with SPPR4 of the CSG – 1 space per bedroom for long stay, 1 space per 5 units for visitor parking. DLR standard is Sheffield stands and any provision over the recommended amount can be of a format of the applicants choosing.

The PA noted that the applicant should capitalise on the location and the links at the site with the placement of the cycle parking.

The applicant confirmed they would carry out a cycle audit.

The PA requested a Traffic Impact Assessment. 3

The PA asked the applicant to ensure that cyclists and pedestrians have priority on the north-south link at the entrance to the car parking.

The PA asked the applicant to have consideration for how it will work at the home zone with regard to accessibility and priority.

### Drainage

The PA noted that the permission that was granted for the entire development was granted prior to the 2022-2028 County Development Plan. The PA noted that the latest CDP has some changes that will impact on this site including Climate Change requirements and Green Roof requirements.

The PA noted that the total volume of attenuation storage is currently unknown.

The PA directed the applicant to Appendix 7 of the CDP – Sustainable Drainage System Measures.

The PA directed the applicant to the green roofs requirements in appendix 7.2 of the CDP – 70% for extensive roof, 50% for intensive roof.

The PA noted the applicant should provide a report to demonstrate that the site is compliant with GSDS requirements.

The applicant was asked to provide drawings that show the original footprint of Block A and the proposed footprint to ensure the area of hardstanding has not increased significantly.

The PA noted that hardstanding areas must be constructed in accordance with SuDS.

The applicant is to provide a site specific Flood Risk Assessment.

The PA noted that there was more detail in the Drainage report that they have submitted and that they would be available for contact before the applicant proceeds to the next stage.

### Parks

The PA asked the applicant if the proposals will affect the scheme overall or the communal open space. The applicant stated that the proposal is largely in line with the permitted scheme.

The applicant confirmed the central courtyard was 30m x 60m and they are aiming to maintain clear and direct access routes to it from the buildings and the ground.

The PA requested cross sections and further landscaping details of the proposed development are provided for the next stage.

The PA noted that protective fencing would be required for tree protection at the northern end of the site.

### Public Lighting

The PA noted that the lighting scheme should tie in with the rest of the development.

The PA advised that the applicant should be careful of light overspill – only the paths should be lit.

The PA advised the applicant to be aware of light blocking by trees and also with podium lighting.

The PA advised to applicant to be conscious of the fact that this development may attract a high percentage of EV cars. The applicant was advised to overestimate this rate when applying to the ESB in order to be sure of being capable of satisfying the future demand.

The PA advised the applicant to consider having electric charging facilities for bicycles available at the bicycle parking stands. The PA described trialling charging of 6-12 bicycles on a 1kw load supply.

The PA advised the applicant to apply for the Maximum Import Capacity (MIC) with the ESB now. 4

### Ecology

The applicant confirmed that the Ecological Impact Assessment Report (ECIA) and the AA screening report were in preparation.

The PA advised the applicant that previous reports, completed in 2020-2022 (eg for bats, breeding birds etc) would now be out of date. The PA directed the applicant to the *CIEEM Advice Note: Lifespan of Ecological reports and Surveys*.

The PA noted that the Landscape architect should liaise with the Ecologist when it comes to planting for the development.

The PA requested dark zones in planting along site boundaries.

The PA noted that all biodiversity measures set out in the ECIA should also be included in the CEMP.

It was noted that there is further detail available in the PA Ecology report.

### Environment and Waste Management

The PA noted that the applicant should return a CEMP.

The PA requested an Operational Waste Management Plan (to cover bins, bin storage, refuse collection etc).

The PA noted the applicant should have consideration for noise impact from the rail line.

The PA directed the applicant to the Noise Action Plan which was published last year. The modelling within shows there will be noise impact on the development from the rail line.

The PA advised the applicant to incorporate acoustic solutions in the design of the development.

The PA noted that serious consideration and design will be required to avoid the impact of the noise disturbing the residents' enjoyment of both internal and external spaces in the development.

### Planning

The PA queried the density of the site, noting that at the LRD1 meeting the applicant had suggested possibly reaching a density of 99 units ph.

The applicant confirmed that the LRD1 proposed density on this site was 75 units ph, and it has been increased in this proposal to 85 units ph.

The PA requested that the applicant include density figures for both this site and the entire portion of DLR lands within the masterplan, with their application.

The PA noted that the applicant should be clear on building heights and provide justification for them in their application.

The applicant confirmed the height of the townhouses is 4 storeys and described the changes in the top storey from the previous design.

The PA questioned if the effect of overshadowing from the blocks on the townhouses has been considered and requested the applicant include analysis on this in the application. Miguel Sarabia, the Senior Planner for the Development Management Team East, made some comments.

He noted that we require more justification and strong reasoning for the building heights proposed.

He referred to the 15 storey block on the Wicklow side of the scheme that is currently being decided on, and noted it could possibly set a precedent for height if granted.

He noted the UK precedents that were submitted.

He noted that their proposal should have regard to the existing context and enhance the landscape around.

Again it was stressed that we would require strong justification for the proposed height of the apartment blocks at the coast.

Meeting concluded

## **APPENDIX C**

### **Inter-Departmental Reports**

#### **Biodiversity Officer**

Biodiversity notes for LRD2 meeting on 14 April 2025

#### **1. Ecological Impact Assessment (EcIA)**

It is noted that EcIA report and AA screening report will be submitted with the final LRD application and it is requested that:

- a. The ecological impact assessment will be based on up to date survey information rather than the results from the 2020-2022 surveys that informed the EIAR for the SHD application. The Applicant's ecologists' attention is drawn to the lifespan of ecological survey results particularly in respect of mobile species (CIEEM Advice Note: The Lifespan of Ecological Reports & Surveys, April 2019).
- b. The EcIA will assess the potential for collision impacts on bat and bird arising from the proposed increase in the height of the apartment buildings in Block A.
- c. The EcIA should also assess the landscape proposals, tree survey results and lighting proposals.

#### **2. Landscape**

- It is requested that the landscape architect liaises with the ecologist in respect of proposed 'native planting' and in respect of enhancement measures.
- It is further requested that opportunities for 'dark zones' (wildlife refuges) in planting along site boundaries are explored.

#### **3. Lighting**

It is noted that the Lighting Report will take account of biodiversity requirements which is welcomed.

#### **4. Biodiversity measures**

- All measures (mitigation and enhancement) in respect of biodiversity set out in the EcIA are to be included in the CEMP.
- A monitoring programme, as appropriate, in respect of these measures is to be included in the EcIA, the CEMP and the OEMP.

*Jenny Neff BSc(Hons) MSc(Ecol) CECol CEnv FCIEEM  
Senior Consultant Ecologist  
14 April 2025*

## **Drainage Planning Department**

From: DLR Municipal Services,  
Drainage Planning,  
Level 3,  
County Hall.

Re: **PAC LRD2 003 25**

**Site Location:** The Townland of Cork Little, Shankill, Co. Dublin

**Lodged:** March 2024

**Drainage Planning Report Date:** 31<sup>st</sup> March 2025

**ABP due decision date:**

### **Drainage Planning report**

#### **Introduction**

The applicant has submitted a detailed report that generally satisfies the requirements of Municipal Services subject to the following comments:

#### **Drainage Planning**

##### **Comments**

The proposed development provides details of Block A, which was originally included in the application ABP31181-21 but was removed by ABP in the granting of permission for the remainder of the development. Following on from the grant of permission, Wicklow County Council agreed to allow discharge to the tidal waters without the requirement for underground storage. This was agreed with DLRCC at compliance stage. The removal of the underground storage does not negate the need for appropriate SuDS measures for the site, as well as interception and/or treatment requirements.

The 2022-2028 County Development Plan has some changes that will impact on the design of this element of development, including the green roof requirements. The changes required should be imposed solely on the area of the site subject to this application.

#### **Surface Water Drainage**

1. As standard, the applicant is requested to ensure that all surface water design proposals are in accordance with the requirements of Appendix 7: Sustainable Drainage System Measures of the County Development Plan 2022-2028.
2. As standard, the applicant is requested to ensure that the proposed surface water design is in accordance with County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, such that the proposal meets the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS). The design must incorporate SuDS measures appropriate to the scale of the proposed development such as green roofs, bioretention areas, permeable paving, rainwater harvesting, swales, etc. that minimise flows to the public drainage system/stream and maximises local infiltration potential.
3. The applicant has indicated that extensive and intensive roofs are to be provided on roofs within the site, to meet the requirements of the development plan, however detail of the areas proposed have not been included. Appendix 7.2 of the

DLRCC CDP sets out a requirement for 70% green roof when an extensive roof is to be provided, with 50% required if intensive. The applicant is requested to ensure that the proposed development meets the requirements of Appendix 7.2: Green Roof Policy of the County Development Plan 2022-2028, such that all developments with a total roof area greater than 300 square metres include a green roof (note that the percentage coverage required depends on the type of green roof proposed). The applicant is requested to demonstrate by calculation and by representation on a drawing that the proposed green roof extents are in accordance with the Council's Green Roof policy. A detailed cross section of the proposed build-up of the green roof should be provided, including dimensions. The applicant should demonstrate that the green roof is designed in accordance with BS EN 12056-3:2000 and The SUDS Manual (CIRIA C753).

4. As standard, the applicant is requested to show the options being proposed for interception and treatment with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere. The interception requirements is based on the total positively drained area, rather than the reduced (factored) impermeable area.
5. As standard, the applicant is requested to ensure that any changes to parking and hardstanding areas shall be constructed in accordance with the recommendations of the Greater Dublin Strategic Drainage Study for sustainable urban drainage systems (SuDS) i.e. permeable surfacing, and in accordance with Section 12.4.8.3 Driveways/Hardstanding Areas of the County Development Plan 2022-2028. Appropriate measures shall be included to prevent runoff from driveways entering onto the public realm as required. Where unbound material is proposed for driveway, parking or hardstanding areas, it shall be contained in such a way to ensure that it does not transfer on to the public road or footpath on road safety grounds.
6. As standard, the applicant is requested to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that all proposed SuDS measures have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual).
7. As standard, and as noted within the application, the applicant is requested to ensure that a Stage 1 Stormwater Audit is carried out for the development. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC prior to lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.

### **Site Specific Flood Risk Assessment**

1. The applicant is requested to comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified. The applicant is requested to submit a drawing identifying and showing details of safe overland flow routes both within and without the site. The overland flow route plan should identify drop kerbs or ramps requested for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.

Signed: Johanne Codd  
**A/Senior Executive Engineer**

Date: 31/03/25

Drainage Planning Municipal Services Department

## **Environmental Enforcement**

### **Assessment:**

DLR Environmental Enforcement Department note that no document detailing the management of environmental emissions of the developed have been supplied. Notwithstanding this based on previous applications and applications for adjoining developments

We are satisfied that the proposal can be undertaken in accordance with standard methods with the submission of the following documents.

Please ensure that any document submitted refer to the correct Council and in addition that the guidance available on our website here <https://www.dlrcoco.ie/environment/environmental-planning-guidance> is considered as part of any future application.

Our experience is that a suite of documents would be the best practice for large developments such as the one proposed here. This includes the following as detailed in section 12.9 of the County Development Plan 2022-2028:

*A Construction Management Plan that includes the following elements (which can be standard-alone documents):*

- i. A Construction Waste Management Plan (also known as a Resource and Waste Management Plan. Note that this should be developed in accordance with Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects (EPA 2021))*
- ii. A Construction Environmental Management Plan.*
- iii. A Construction Traffic Management Plan. (for consideration by Traffic Department)*

Note that aspects relating to health and safety are not reviewed or approved as part of this Offices review. In addition, DLR Environmental Enforcement would request the following additional reports to be submitted alongside the final planning application:

### **Operational Waste Management Plan (REF section 12.9 of DLR County Development plan)**

An operational waste management plan should be provided as part of any future application to ensure management of all operational waste within the curtilage of the development in accordance with relevant waste legislation including byelaws.

See Guidance Notes for Operational Waste Planning November 2023 available at <https://www.dlrcoco.ie/environment/environmental-planning-guidance>

The plan shall include detail in relation to waste storage and collection, measures within individual units to support segregation of waste and proposed measures in relation to access, monitoring and security of proposed bin stores.

### **Operational Noise Management**

The final detailed design and location of building services, such as heat pumps, must avoid the generation of potential conflicts in terms of noise amenity affecting adjoining land uses.

See Good Practice Guide for Acoustic Planning of New Projects available at <https://www.dlrcoco.ie/environment/environmental-planning-guidance>

The applicant should consider the final design and review the impact of the adjoining rail line on aspects of the development. The applicant is directed to the recently published Dublin Agglomeration Noise Action Plan 2024-2028 and associated noise maps.

Public Liaison Plan

The Applicant shall develop and implement a 'Public Liaison Plan' for the duration of the works

All plans submitted as part of the final planning application should be developed in accordance with the guidance available on the DLRCC website here:

<https://www.dlrcoco.ie/environment/environmental-planning-guidance>

Report prepared by,

Ultan Downes

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Senior Executive Scientist

DLR Environmental Enforcement / Waste Management

Infrastructure and Climate Change Department,

Dún Laoghaire-Rathdown County Council, Marine Road, Dún Laoghaire, Co. Dublin.

## **Environmental Health**

This office response to  
PAC/LRD2/003/25 - Lands within former Bray Golf Course, off Ravenswell Road, Bray

That the planning proposal include the following:

### **Construction Environmental Management Plan**

1. Submit a Construction Environmental Management plan to reduce any adverse impacts from construction on the environment and health and control any temporary emissions during the demolition and construction phase to prevent nuisance or adverse health effects. The plan should take into account the following: Waste Management, Staff welfare facilities, Pest Control Management, Dust impacts, Excessive noise & vibration, environmental monitoring plan, public liaison plan, emissions to Surface and / or Ground Water

### **Resource & Waste Management Plan**

2. A Resource & Waste management plan shall be submitted to ensure compliance with the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects 2021.

### **Operational Waste Management Plan**

3. Submit an Operational Waste Management Plan in accordance with Dun Laoghaire Rathdown Co Co Guidance Notes for Operational Waste Management Planning for Residential and Commercial Developments November 2023

Regards

Rose

**Rose McCaul** | Senior EHO | Environmental Health Service | Silverstone House | [Ballymoss Road](#) | [Sandyford](#) | D18A7K7 | 01 2020580