

**Our ref: IE002560**

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Date: 28 August 2025

Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow,  
A67FW96.

**RE: Application by Shankill Property Investments Limited, for retention permission for amendments to a development comprising a Large Scale Residential Development at Block C, Sea Gardens, Former Bray Golf Club Lands, Off Ravenswell Road and Dublin Road, Bray, Co. Wicklow . The Large-scale Residential Development application consists of the retention of amendments to the Strategic Housing Development permitted under ABP-311181-21.**

The retention permission for amendments sought to Block C comprise of:

**A. Relocation of the vehicular entrance to the under-croft car park for Block C.**

**B. Reconfiguration and changes of uses at the ground floor layout of Block C resulting in:**

- an increase in gross floor area of the permitted childcare facility from 627 sqm to 672 sqm;
- the relocation of the permitted café unit and an increase in gross floor area from 195 sqm to 228 sqm;
- the relocation of the permitted convenience retail unit and an increase in gross floor area from 249 sqm to 420 sqm; and
- the relocation and reconfiguration of ancillary uses.

These changes have resulted in a net increase in gross floor area of 249 sqm (45 sqm increase to the childcare facility use, 33 sqm increase to the café use, 171 sqm increase to the convenience retail use) but with no change to the building footprint.

**C. Minor alterations to the ground floor external elevations to reflect relocation of vehicular entrance, reconfiguration of internal uses impacting on the positions of windows and door openings and addition of 2 no. external on-street car parking spaces.**

Dear Sir/Madam,

RPS is instructed by Shankill Property Investments Limited to submit this retention permission for amendments to a development comprising a Large-scale Residential Development (LRD), which was permitted as Strategic Housing Development (SHD) under case reference ABP-311181-21.

A list of enclosures is appended to this letter.

### **Amendments to be Retained**

The amendments to be retained are modest in nature and relate to the relocation of the vehicular entrance to Block C and reconfiguration of the ground floor plan as previously permitted under ABP-311181-21.

The rearrangement and relocation of uses within the ground floor plan resulted in changes to the use mix and the need for minor external elevational changes to the ground floor of Block C to reflect repositioning of door and window openings.

These amendments are described in greater detail in the accompanying *Planning Report and Consistency Statement* and drawing package.

### **Application Site Area**

The site area of the permitted SHD (ABP-311181-21) incorporated lands within the jurisdictions of both Wicklow County Council and Dún Laoghaire-Rathdown County Council. The subject LRD retention permission application relates to lands within the area of authority of Wicklow County Council only, the application site boundary reflects this and the site boundary line incorporates the permitted Block C area.

The amendments to be retained impact a small portion of the site permitted under the SHD (ABP-311181-21). The related public roads and access proposals to the overall permitted scheme are not subject of any amendments.

### **Pre-Application Consultation and LRD Opinion**

Due to the very modest nature of the revisions sought, a determination was sought from Wicklow County Council under section 247(7) of the Planning and Development Act 2000, as amended (hereafter referred to as 'the Act') that pre-application consultations under section 247 were not required, and that consequently an LRD meeting and opinion were also not required. A letter was issued by the Planning Authority dated 11 August 2025 confirming that it had determined that no further consultation is required in this instance.

A copy of the letter from Wicklow County Council accompanies this application.

### **Statutory Requirements of Application**

This application complies with the requirements of articles 20A and 22 of the Planning and Development Regulations 2001, as amended, of a LRD as set out in the following table.

**Table 1 - Requirements Of Articles 20A and 22**

Sub Article	Content	Provision within Application
20A(2)	Subject to sub-article(3), the applicant for an LRD shall make a copy of an LRD application available for inspection on the Internet at a web address set up for the purpose for the period commencing on the date of making the LRD application and expiring 8 weeks following the sending by the planning authority to the applicant of a copy of its decision on the LRD application.	Copy of application is available on <a href="http://www.seagardensblockclrd.com">www.seagardensblockclrd.com</a>
22(1)	A planning application under section 34 of the Act shall be in the form set out at Form No. 2 of Schedule 3, or a form substantially to the like effect.	Wicklow County Council standard planning application form completed and enclosed
22(1A)	Notwithstanding sub-article (1), a planning application under section 34 of the Act in respect of an LRD shall also include a copy of the form set out at Form no. 19 of Schedule 3, or a form substantially to the like effect.	Wicklow County Council supplementary Form no. 19 completed and enclosed.
22(2(a))	the relevant page of the newspaper, or a copy of the relevant page, including the date and title of the newspaper, in which notice of the application has been published pursuant to article 17(1)(a), and a copy of the site notice erected or fixed on the land or structure pursuant to article 17(1)(b)	Page of the Irish Daily Star dated 01/09/2025 enclosed.  Copy of site notice erected on 01/09/2025 enclosed.
22(2(b))	6 copies of a location map of sufficient size and containing details of features in the vicinity such as to permit the identification of the site to which the application relates, to a scale (which shall be identified thereon) of not less than 1:1000 in built up areas and 1:2500 in all other areas, or such other scale as may be agreed with the planning authority prior to the submission of the application, in any particular case and marked so as to identify clearly: (i) the land or structure to which the application relates and the	Location Map of development to be retained at 1:1000 enclosed.  This application is being submitted through the Local Authority Planning Portal. As requested by Wicklow County Council 2 copies of planning application are being submitted.

Sub Article	Content	Provision within Application
	boundaries thereof in red, (ii) any land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application in blue. (iii) any wayleaves in yellow, and (iv) the position of the site notice or notices erected or fixed to the land or structure pursuant to article 17(1)(b),	
22(2(c))	where it is proposed to dispose of wastewater from the proposed development other than to a public sewer, information on the on-site treatment system proposed and evidence as to the suitability of the site for the system proposed	N/A
22(2(d))	the documents, particulars, plans, drawings and maps referred to in sub-article (4),	<p>Please refer to schedule of enclosed documents.</p> <p>Site layout plans @1:500 are enclosed showing the development 'as permitted' and the development to be retained incorporating the amendments.</p> <p>We also enclose other plans including elevations and floor plans of the development 'as permitted' and development to be retained under this application for amendments.</p>
22(2(e))	In the case of an application for permission for the development of houses or of houses and other development, to which section 96 of the Act applies, details as to how the applicant proposes to comply with a condition referred to in sub-section (2) of that section to which the permission. if granted, would be subject	N/A – the amendments do not impact the houses permitted under ABP-311181-21
22(2A(a))	where it is proposed to connect the development to a public water or wastewater network, or both, evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services	The amendments to be retained do not alter any permitted connections to the public water/wastewater networks. Accordingly, the letter of feasibility from Irish Water as lodged

Sub Article	Content	Provision within Application
	and that the relevant water network or networks have the capacity to service the development,	with the SHD application ABP-311181-21 is hereby enclosed.
22(2A(b))	where, under section 32D of the Act, the planning authority issued an LRD opinion to the prospective LRD applicant that the documents enclosed with the request for the LRD meeting do not constitute a reasonable basis on which to make the LRD application, the LRD application shall be accompanied by a statement of response to the issues set out in the LRD opinion	N/A - a determination was issued from Wicklow County Council under section 247(7) of the Planning and Development Act 2000 that further consultation was not required. Accordingly, no LRD meeting was held and no LRD opinion was issued.
22(2A(c))	a schedule of accommodation that details the number and type of housing units proposed, unit floor areas, bedrooms and bed spaces for the individual units, the private amenity space associated with each unit, the storage space associated with each unit, the principal dimensions and the aggregate floor area of each room and in the case of apartments whether the unit is dual or single aspect.	The amendments included in this application do not affect any permitted residential accommodation. No updated schedule of accommodation is therefore required.
22(2A(d))	any information specified by the planning authority under article 16A(7)	N/A – The Planning Authority did not issue an opinion under section 32D of the Act.

## General Content of Application Documentation

To clarify the amendments to be retained, the drawings included with the application present both 'as permitted' layout drawings and the 'to be retained' layout drawings.

A *Planning Report and Consistency Statement* is also enclosed describing the reasons for the retention of development and a statement of consistency of the amendments with the relevant development plan policy.

## Application Fee

The relevant application fee in this case is €3,735. It is calculated under Schedule 9, Section 2, Scale of Fees for Planning Applications of the Planning and Development Regulations 2001 (as amended) as replicated in Table 2 below.

**Table 2: Scale of Fees Class 14 Applications**

<b>Class of development</b>	<b>Amount of fee</b>	<b>Amount of fee for retention permission</b>
Class 14		
The provision of a large-scale residential development:		
(a) Pre-Application Consultation	€1,500	
(b) Basic fee structure: Each Housing Unit	€130 per housing unit	€390 per housing unit
(c) Fee Structure for other uses on the land, the zoning of which facilitates such use: per square metre of gross floor space to a maximum of 30% of floor space of the entire development.	€7.20 per square metre to a maximum of €32,400	€15 per square metre to a maximum of €65,000
(d) Submission of an EIS/NIS Fee Structure:		
Submission of EIS	€10,000	€10,000
Submission of NIS	€10,000	€10,000

The net increase in gross floor area of 'other uses' is 249 sqm. Therefore, the application fee is calculated as follows:

$$249 \text{ sqm} \times €15 \text{ per sqm} = \mathbf{€3,735}$$

We trust that all is in order and look forward to a positive decision in due course.

Yours sincerely,  
for RPS



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## List of Enclosures

- 2 no. hard copies of the entire application submitted to the office of Wicklow County Council, as requested
- 1 no. digital copy of Cover Letter to WCC (this letter)
- 1 no. digital copy of Planning Report and Consistency Statement (by RPS)
- 1 no. digital copy of Form 19
- 1 no. digital copy of WCC Application Form
- 1 no. digital copy of Site Notice
- 1 no. digital copy of Newspaper Notice
- 1 no. digital copy of the Letter of Consent from Applicant to Agent
- 1 no. digital copy of the suite of architectural drawings (by Howells Architects)

Item no.	Drawing Number	Drawing Title	Scale
1	BRA-GHA-C-XX-DR-A-05001	Site location Plan	1:1000
2	BRA-GHA-C-ZZ-DR-A-01100	Block C – Site Plan – As Permitted	1:500
3	BRA-GHA-C-ZZ-DR-A-01102	To be Retained Block C Site Plan	1:500
4	BRA-GHA-C-ZZ-A01101	To be Retained – Block C Ground Floor Plan	1:200
5	BRA-RAU-02-1C_00-DR-A-1001	Block C – General Arrangement Plan – Ground Floor Plan (As Permitted)	1:200
6	BRA-GHA-C-ZZ-DR-A-01400	To Be Retained Block C- General Arrangement Elevations – Sheet 1	1:200
7	BRA-GHA-C-ZZ-DR-A-01401	To Be Retained Block C – General Arrangement Elevations Sheet 2	1:200
8	BRA-RAU-02-1C_ZZ-DR-A-2001	Block C – General Arrangement Elevations – Sheet 1 (as permitted drawing)	1:200
9	BRA-RAU-02-1C_ZZ-Dr-A-2002	Block C – General Arrangement Elevations – Sheet 2 (as permitted drawing)	1:200