

Block C Sea Gardens Amendments to Permitted Strategic Housing Development (Ref. No. ABP- 311181-21) at Former Bray Golf Club Lands, Bray, Co. Wicklow

Planning Report & Consistency Statement

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1 INTRODUCTION

RPS has been instructed by the applicant, Shankill Property Investments Limited, One Royal Canal House, Royal Canal Park, Dublin 15 to submit a Large-scale Residential Development (LRD) planning application for retention permission on its behalf, comprising minor amendments to a permitted Strategic Housing Development (SHD) (Ref. ABP-311181-21).

The amendments to be retained relate to Block C within the ‘Sea Gardens’ development situated at the former Bray Golf Club Lands off Ravenswell Road and the Dublin Road, Bray, County Wicklow. The development permitted under the SHD permission, ABP-311181-21.

1.1 Site Location and Context

The permitted Strategic Housing Development is located on lands that extend across the administrative boundaries of both Wicklow County Council (WCC) and Dún Laoghaire-Rathdown County Council (DLRCC). The subject amendment application is located solely within the county boundary of Wicklow. The site forms part of a larger landholding within the Applicant’s ownership that is currently being developed as Sea Gardens (formerly Coastal Quarter and River Quarter). The subject site is located within the Former Bray Golf Club lands north of the Dargle River and Bray Town Centre (see **Figure 1-1**).



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

Source: Google Earth with RPS annotation)

A Site Plan As Permitted (Drawing No. BRA-GHA-C-ZZ-DR-A-01100) prepared by Howells Architects is enclosed, which outlines the full extent of the application site boundary in context with the development permitted under ABP-311181-21.

1.2 Nature of the Application

Retention permission is sought for modest revisions to the ground floor of Block C.

The amendments to be retained comprise of the relocation of the entrance to the under-croft car park for Block C and reconfiguration of the ground floor of Block C as previously permitted under ABP-311181-21.

The rearrangement and relocation of uses within the ground floor plan resulted in the amendments 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.

The appropriate consent route for permission for these revisions is to submit a Large-scale Residential Development application for the revisions.

Due to the very modest nature of the revisions to be retained, a determination was sought from WCC 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 consequently an LRD meeting and opinion were also not required. A letter was issued by the Planning Authority dated 11th August 2025 confirming that it had determined that no further consultation is required in this instance.

A copy of the letter from WCC accompanies this application.

2 PLANNING HISTORY

2.1 Strategic Housing Development Application: ABP-311181-21

Permission was sought by Shankill Property Investments Limited on 20 August 2021 from An Bord Pleanála for development comprising:

"Change of use of lands from former golf course use to residential and other uses consisting of 591 no. residential units and c.1,336 sq.m of other uses comprising of a retail unit, 2 no. commercial units, a childcare facility and a café.

The development will comprise 76 no. houses consisting of 13 no. 2-bedroom 2-storey terraced houses, 51 no. 3-bedroom 2-storey terraced houses and 12 no. 4-bedroom 3-storey terraced houses; 26 no. 2-bedroom own door ground floor apartments with 26 no. 3-bedroom own door duplex apartments over resulting in 52 no. units with balconies and gardens within 26 no. 3-storey terraced buildings; and; 4 no. apartment blocks ranging in height from 3 to 8-storeys and containing 463 no. units consisting of 171 no 1-bedroom units, 288 no. 2-bedroom units and 4 no. 3-bedroom units. Each apartment block which will comprise of:

- Block A ranging in height from 4 to 8-storeys and containing 166 no. units consisting of: 49 no. 1-bedroom apartments and 117 no. 2-bedroom apartments all with balconies or terraces; residential amenity spaces including a sky lounge on the eighth storey; external communal open space on a central podium; car and bicycle parking spaces; ancillary plant; waste storage and substations/switch rooms at undercroft level.*
- Block B ranging in height from 4 to 8-storeys and containing 191 no. units consisting of: 57 no. 1-bedroom apartments and 134 no 2-bedroom apartments, all with balconies or terraces; residential amenity spaces including a sky lounge on the eighth storey; external communal open space on a central podium; car and bicycle parking spaces; 2 no. commercial units (c.64 sq.m and c.201 sq.m); ancillary plant; waste storage and substations/switch rooms at undercroft and lower ground levels.*
- Block C ranging in height from 3 to 6-storeys and containing 80 no. units: 45 no. 1-bedroom apartments, 31 no. 2-bedroom apartments and 4 no. 2-bedroom duplex units, all with balconies or terraces; c.195 sq.m café, c.249 sq.m retail unit and c.627 sq.m childcare facility at ground level with ancillary outdoor space, with associated external space; residential amenity space; external communal open space on a central podium; car and bicycle parking spaces; ancillary plant; waste storage and substation/switch rooms at undercroft level.*
- Block D is a 4-storey building and contains 26 no. units: 20 no. 1-bedroom apartments and 6 no. 2-bedroom apartments with balconies; car and bicycle parking spaces, ancillary plant, waste storage and substation/switch rooms at undercroft level.*

The proposed development will include:

- 551 no. ancillary car parking spaces comprising 474 no. resident spaces and 32 no. visitor spaces, 35 no. staff spaces; 9 no. set-down spaces and 1 no. car club space; 45 no. of these spaces will be served by e-charging points; 291 no. of these spaces will be at undercroft level with the remaining 260 no. at surface, on street or on curtilage*
- 14 no. resident motorcycle spaces at undercroft level*

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- 1,184 no. bicycle parking spaces comprising, 890 no. resident apartment spaces at undercroft level and 256 no. visitor spaces (of which 136 no. at undercroft level and 120 no. at surface level) associated with Blocks A, B, C and D, 30 no. staff spaces associated with non-residential uses and 8 no. cargo bicycle spaces. In addition, bicycle parking for the house and duplex units is provided on curtilage as secure bike stores to the front of the units which will accommodate 2 no. bicycles per unit equating to 256 no. bicycle storage spaces.

The proposed development will also include all associated plant; refuse storage areas; communal open space; public open space; playgrounds; multi-use games area; associated internal roads and drainage arrangements; facilitating utility connections, facilitating linkages with adjoining sites; landscaping; public lighting; construction compounds; and; all site development works.”

Figure 2-1 presents a site layout of what was proposed.



Figure 2-1: Site layout as proposed under SHD application ABP-311181-21.

Source: Reddy Architecture + Urbanism drawing no. BRA-RAU-02-CQ_ZZ-DR-A-2025

A split decision permission was granted by An Bord Pleanála dated 9 December 2021. Permission was refused for the proposed Block A and Block B and granted for the remainder of the development as proposed in accordance with the plans and particulars lodged. This resulted in permission being granted for:

- Total of 234 no. residential units comprising 76 no. 2 and 3 storey houses; 52 No. duplex apartment units in 3 storey terraced buildings. and 106 No. apartments in two apartment blocks.
- C. 627 sqm childcare facility in apartment Block C.

- C. 195 sqm café in apartment Block C.
- C. 249 sqm retail unit in apartment Block C.
- 261 no. car parking spaces.

Figure 2-2 illustrates the layout of Block C as permitted and which is the subject of this application.

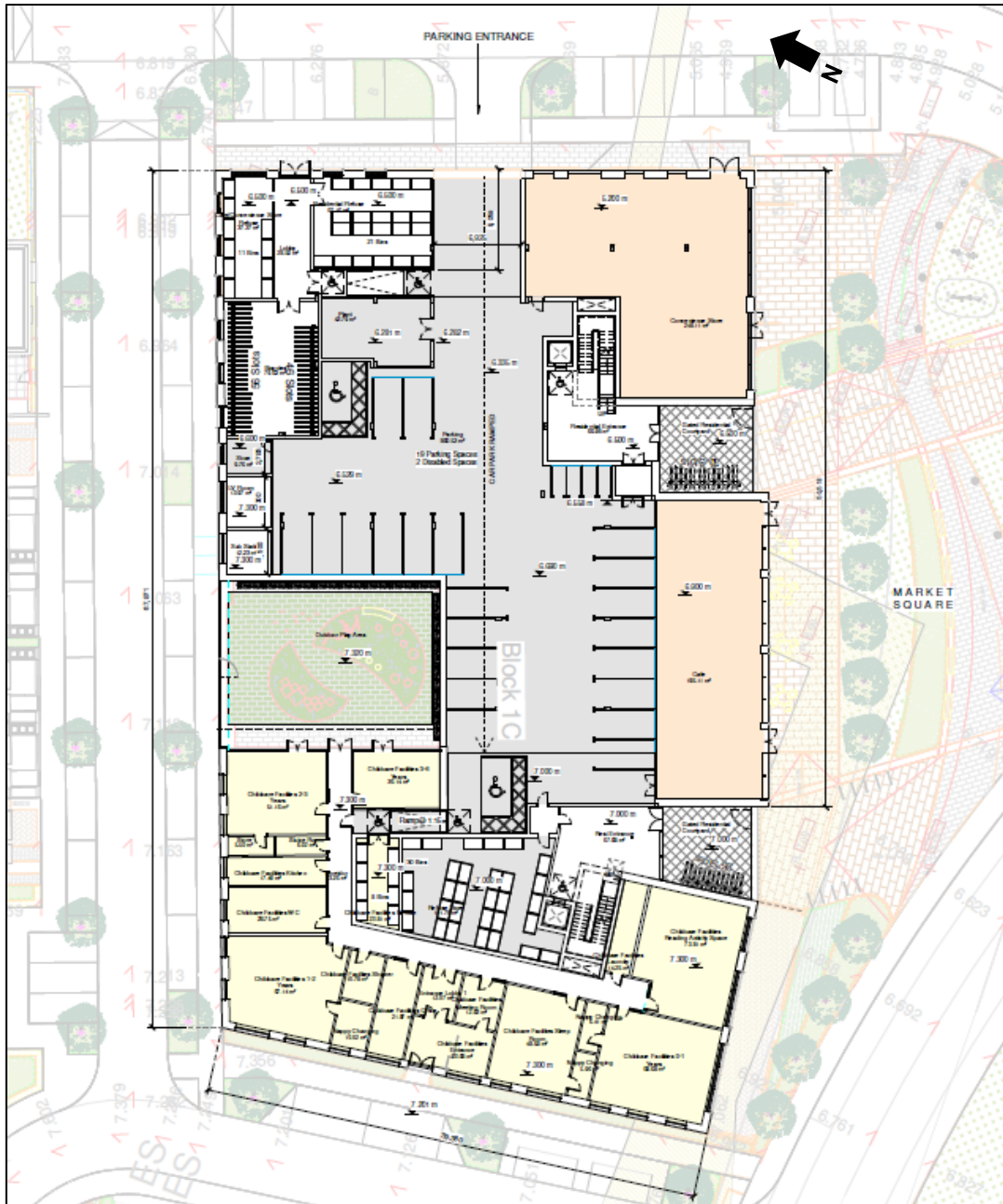


Figure 2-2: Block C ground floor plan permitted under ABP-311181-21.

Source: Reddy Architecture + Urbanism Drawing no. BRA-RAU-02-1C_00-DR-A-1001

2.2 Dún Laoghaire-Rathdown County Council: LRD23A/0566

On 30 August 2023, Shankill Property Investments Limited submitted a planning application to DLRCC for proposed amendments to the SHD application permitted under ABP-311181-21.

“The Large scale Residential Development application consists of amendments to a permitted Strategic Housing Development (permitted under ABP-311181). The

amendments comprise of 4 No. additional in-curtilage car parking spaces (2 No. car parking spaces within each of the curtilages of a permitted house and a permitted duplex unit (3 bed duplex over 2 bed apartment)); 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.”

Figure 2-3 outlines the extent of the area where amendments were sought (outlined in green) under LRD23A/0566.



Figure 2-3: Extract of Proposed Site Layout Plan permitted under LRD23A/0566.

Source: Dún Laoghaire-Rathdown County Council Online Planning Service.

A request for determination under section 247(7) of the Act was submitted with regard to this application. DLRCC agreed that no further consultation was required in this instance and the applicant could proceed with the lodgement of the application for a LRD consisting of amendments to the SHD permitted.

A decision to grant permission subject to 6 no. conditions was issued on 23 November 2023.

2.3 Strategic Housing Development Application: ABP-314686-22

Following a receipt of a split decision under ABP-311181-21 with permission for Blocks A and B refused permission, Shankill Property Investments Limited lodged a further SHD application with ABP. That application comprised all of the elements of the development as permitted under ABP-311181-21 and new proposals for Blocks A and B. A decision on this application was granted by An Bord Pleanála subject to conditions on 1 July 2024, however the applicant decided not to proceed.

A planning application for an LRD has been submitted to DLRCC for a new design for Block A (see **Section 2.4.2**). Proposals are being prepared for Block B and will be submitted to WCC for assessment in due course.

2.4 Adjoining lands

2.4.1 Wicklow County Council Reg Ref. 2560207

On 24 March 2025, Shankill Property Investments Limited submitted a planning application to WCC for Phase 2 of the overall Sea Gardens development. The application site lies south of Block C, the subject of this planning application.

A response to a Further Information Request in relation to the planning application for Phase 2 issued by WCC is currently being assessed.

2.4.2 Dún Laoghaire-Rathdown County Council Reg Ref. LRD25A/0644

On 19 August 2025, Shankill Property Investments Limited submitted a LRD application to DLRCC for the development of Block A of Phase 1 Sea Gardens.

The proposed development will consist of 159 no. residential units comprising of 3 to 4 storey terraced townhouses and apartment units within 2 no. blocks ranging from 6-11 storeys in height.

A decision is due on 14 October 2025.

3 RETENTION OF AMENDMENTS

3.1 Permitted Block C

Block C is permitted under as part of a SHD under case reference ABP-311181-21 (see **Figure 2-2**). Permitted Block C comprised of a 5-storey apartment building which included the following;

- 80 no. apartments
- 23 no. car parking spaces at undercroft (ground floor) level
- Childcare facility (627 sqm)
- Café unit (195 sqm)
- Convenience retail unit (249 sqm)
- 146 no. bicycle spaces (126 long term and 20 short term)
- Ancillary bin storage space and plant rooms.

3.2 Scope of Amendments

The subject application relates specifically to Block C of the development permitted under ABP-311181-21. Block C is currently under construction as part of Phase 1 of the Sea Gardens development, and the current application seeks approval to retain the development with the modifications made during the ongoing construction.

The amendments to be retained comprise of the following;

- Relocation of the vehicular entrance to the under-croft car park for Block C.
- 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; and
 - 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.
 - 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 and 171 sqm increase to the convenience retail use) but with no change to the building footprint.

- 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.

No alterations are proposed to the residential aspect of Block C as permitted under ABP-311181-21.

3.3 Amendments to be Retained

3.3.1 Relocation of the vehicular entrance to under-croft car park

Retention permission is sought for the relocation of the vehicular entrance to the under-croft car park to Block C. Under ABP-311181-21, the vehicular entrance was permitted along the eastern elevation of the structure. However, the subject application seeks to retain the entrance as constructed on the northern elevation (Please see **Figure 3-1** below).

The rationale for the relocation of the vehicular entrance to the northern elevation centres around the split decision issued under ABP-311381-21, which omitted both Block A and Block B. The Block B site is located directly adjacent to Block C to the east. As a result, temporary hoarding surrounding the undeveloped area where Block B would have been positioned will need to remain in place until permission for development can be gained on site. This temporary hoarding prohibits access along the road east of Block C, therefore, the access was moved to the northern elevation to allow construction to continue. Block C not only includes 80 no. residential units but also delivers important community infrastructure, including childcare facility, café and convenience retail uses.

The relocation of the vehicular entrance means that 2 no. on-street parking spaces, originally located along the northern boundary of Block C have been relocated to the eastern boundary. 2 no. additional on-street parking spaces have also been provided along the eastern boundary as a result of the relocation of the entrance.

3.3.2 Reconfiguration of the ground floor of Block C

The relocation of the vehicular access has resulted in the reconfiguration of the internal layout of the ground floor under-croft area and associated facilities. It is important to note that the footprint of the overall Block C development has not been altered as a result of the amendments to the permitted scheme. The revised layout enhances the efficiency of the ground floor area and allows for an increase in the floor area associated with the childcare facility, café and convenience retail units.

The bin stores and plant rooms have been moved from the northern edge of the ground floor and placed to the rear of the associated facilities which they will serve. The substation, switch room and generator room will remain along the northern boundary. The bicycle parking has been relocated to the rear of the childcare facility. The quantum of bicycle parking and car parking spaces provided within the reconfiguration of the ground floor layout remain as permitted under ABP-311181-21.

The units now comprise of:

- The permitted childcare facility has now increased from 627 sqm permitted under ABP-311181-21 to 672 sqm, an increase of 45 sqm.
- The permitted café area has also increased from 195 sqm as permitted to 228 sqm, an increase of 33 sqm.
- The permitted convenience retail unit floor area has increased from 249 sqm to 420 sqm, an increase of 171 sqm.

It should be noted that as part of the subject application, the convenience retail unit and the café unit have switched locations. Figure 3-1 outlines the ground floor layout to be retained under the subject permission.

Please refer to **Section 4.1.1** below.

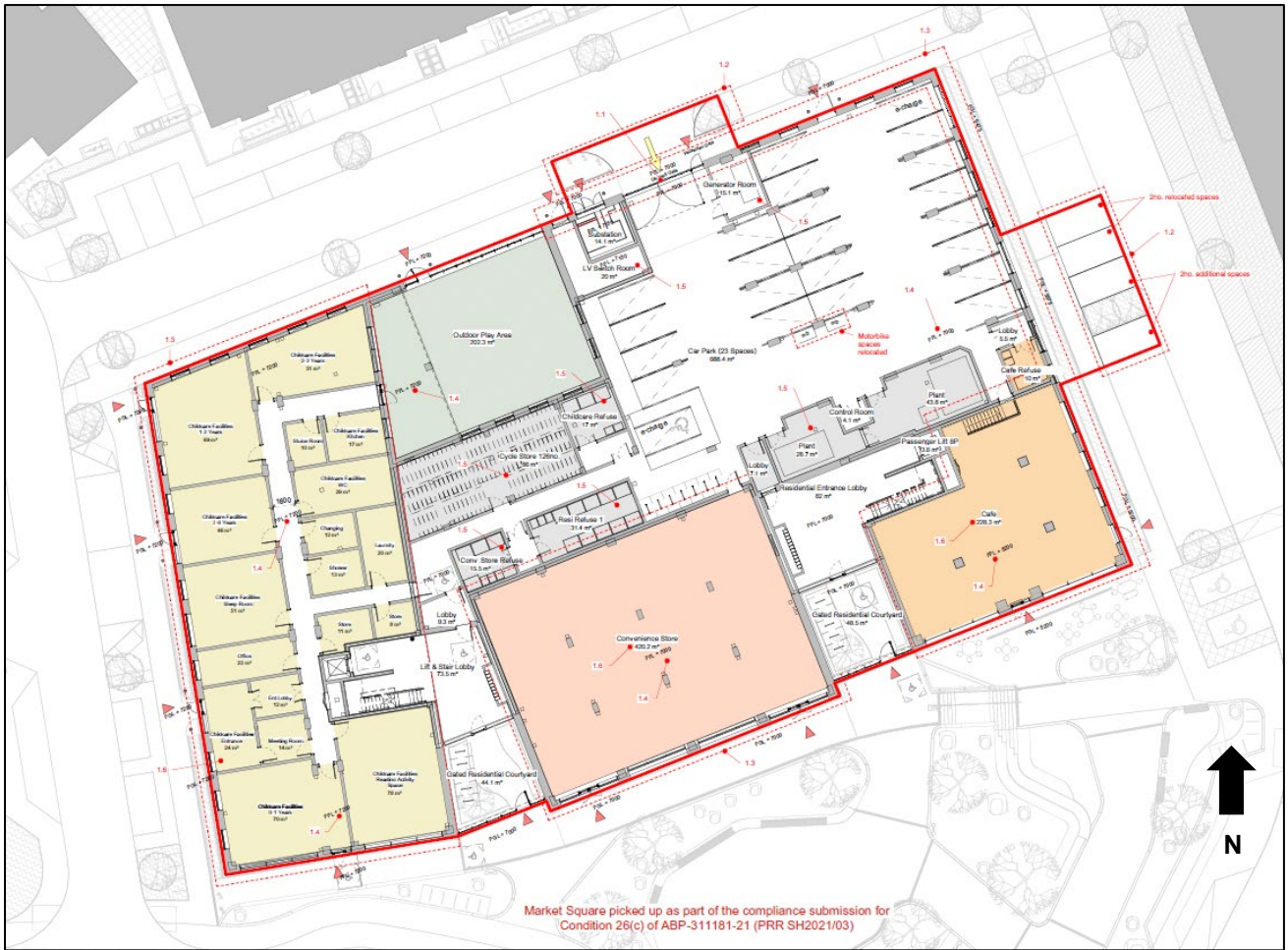


Figure 3-1: Site Plan to be retained

Source: Drawing no. BRA-GHA-C-ZZ-A-01101 prepared by Howells Architects

3.3.3 Minor alterations to ground floor external elevations

As a result of the changes outlined in **Section 3.2.1** and **Section 3.2.3**, the external elevations to the ground floor of Block C have changed slightly. The ground floor frontages have been reconfigured to reflect the new parking entrance and parking bay locations. The relocation of the vehicular access has been incorporated into the design, along with minor revisions to shop fronts and the childcare facility. The changes include minor alterations to the positioning of openings and fenestration. Please see *Drawings no. BRA-GHA-C-ZZ-DR-A-01400* and *BRA-GHA-C-ZZ-DR-A-01401* prepared by Howells Architects which is enclosed with the planning application. Figure 3-2 below provides an indication of the minor changes to be retained to the southern elevation of the ground floor of Block C.

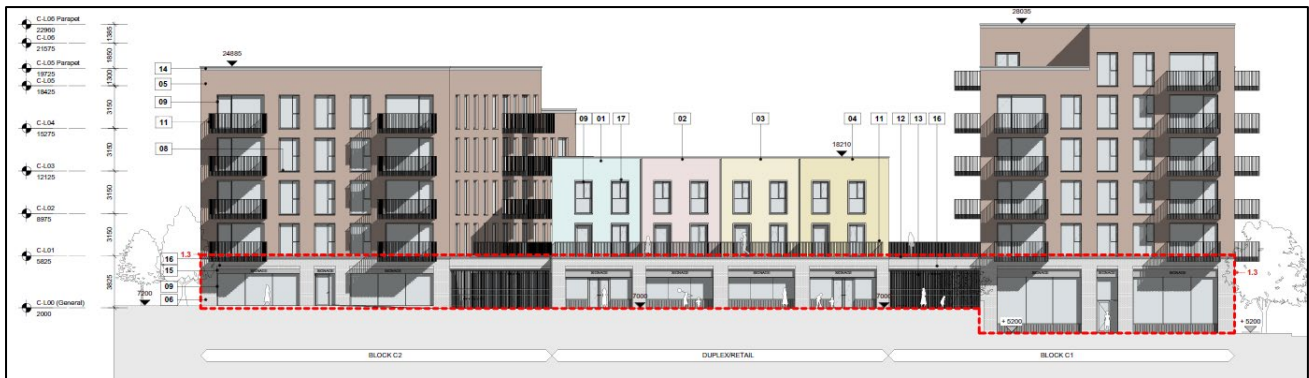


Figure 3-2: South elevation to be retained

Source: Drawing no. BRA-GHA-C-ZZ-DR-A-01400 prepared by Howells Architects

3.3.4 Change of use

The reconfiguration of the ground floor of Block C as outlined in **Section 3.2.2** has relocated uses permitted within the ground floor plan essentially swapping the café unit with the convenience retail store unit, and altering the size of each of the units to optimise efficiency and operation.

No new uses are proposed and the rationale for the reconfiguration is considered appropriate in order to provide a larger convenience offering within this phase of the permitted residential scheme.

4 PLANNING POLICY & CONSISTENCY STATEMENT

The amendments to be retained relate to minor alterations to the ground floor of Block C as permitted.

We set out below the relevant policy provision of the *Wicklow County Development Plan 2022-2028* (WCDP 2022-2028) which is the current statutory development plan for the relevant part of the permitted SHD permission which falls within the area of authority of Wicklow County Council.

It should also be noted that the permitted SHD was permitted in accordance with the *Bray Municipal District Local Area Plan 2018-2024* (BMDLAP) and the *Wicklow County Development Plan 2016-2022*.

4.1 Relevant provisions of the Wicklow County Development Plan 2022-2028

As noted, the permitted SHD was permitted in accordance with the *Wicklow County Development Plan 2016-2022*. The policy and objectives included in the WCDP 2022-2028 relevant to the subject development remain unchanged from those set out in the *Wicklow County Development Plan 2016-2022*.

As detailed in Section 1.3 of the plan, the WCDP 2022-2028 has been developed in alignment with high-order strategic policy documents, such as the NPF and the RSES, along with relevant Ministerial Guidelines. The core strategy of the WCDP 2022-2028 focuses on healthy placemaking, climate change mitigation and economic opportunity.

The development to be retained is in accordance with these overarching themes. The amendments to be retained enhance the ground floor layout of Block C, providing a larger retail offering and essential amenity in terms of childcare provision for future occupants of the surrounding area.

Section 2.4.3 of the WCDP 2022-2028 outlines the ten strategic county outcomes (SCOs). Table 1 illustrates how the development to be retained aligns with the relevant SCOs. Additionally, Table 1 identifies the pertinent objectives from various chapters of the WCDP 2022-2028 against which the amendments should be evaluated.

Table 1: Planning Appraisal – WCDP 2022-2028 SCOs and relevant objectives.

Reference & Details	Appraisal
<p>SCO4 – Sustainable Healthy Communities</p> <p><i>Places should facilitate a high quality of life for all regardless of age or ability. Access to quality housing, employment, childcare, education, health services, community facilities and a clean unpolluted, environment including clean air and water, are defining elements of healthy, attractive and successful places. Investment in a well-designed public realm which includes public spaces, parks, playgrounds, streets and recreational and sport infrastructure to cater for all ages is essential.</i></p>	<p>The development to be retained will not change the uses of the permitted development. The amendments to be retained increase the floor area of the permitted childcare facility, convenience retail unit and café unit, which will serve the future occupants of the residential development and enhance the quality of life for the occupants.</p>
<p>SCO5 - Sustainable Mobility</p> <p><i>The County Development Plan plays an important role in influencing a reduction in GHG emissions by guiding the sustainable growth of</i></p>	<p>The amendments to be retained do not materially impact the quantum of parking spaces originally permitted under ABP-311181-21. The relocation of</p>

Reference & Details	Appraisal
<p><i>the County. The integration of land use and transportation planning, in order to support sustainable mobility and encourage a shift away from the private car to active travel (walking and cycling) and public transport, will deliver improvements in terms of quality of life and climate change.</i></p>	<p>the entrance to the buildings parking areas has resulted in the provision of 2 no. additional parking spaces.</p>
<p>SCO8 - A Strong Economy</p> <p><i>Strengthen and broaden the economic base, harness opportunities for economic growth to build economic resilience, strengthen enterprise ecosystems and create quality jobs that align with population growth, ensure a good standard of living and reduce the need for long distance commuting. Support place making improvements that will generate economic confidence and in turn make settlements more attractive to employers and a skilled workforce. Support community wealth building as a transformative approach which is about creating a better and more sustainable economy that strengthens our communities through local job creation, sustainable development and local business networks.</i></p>	<p>The amendments to be retained increase the floor area of all 3 no. uses permitted under ABP-311181-21, strengthening the economic base of this phase of the residential development.</p>
<p>CPO 4.5: <i>To ensure that all settlements, as far as is practicable, develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.</i></p>	<p>The amendments to be retained continue to integrate residential, retail and commercial development. It is considered that the amendments to be retained accord with CPO 4.5 of the WCDP.</p>
<p>CPO 7.27: <i>To facilitate the provision of childcare in a manner, which is compatible with land-use and transportation policies and adheres to the principles of sustainable development</i></p>	<p>The childcare facility granted under ABP-311181-21 was designed to cater for the entire Phase 1 development. The amendments to be retained increases the floor area of the childcare facility and supports future sustainable development within the surrounding area. It is considered that the amendments to be retained accord with CPO 7.27.</p>
<p>CPO 7.29: <i>Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted</i></p>	<p>The development to be retained accords with CPO 7.29, please refer to response to CPO 7.27 and Section 4.1.1.</p>

Reference & Details	Appraisal
<p><i>development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years.</i></p>	
<p>CPO 10.24: <i>To facilitate the provision of local retail units in residential areas where there is a clear deficiency of retail provision, subject to protecting residential amenity.</i></p>	<p>The amendments to be retained, facilitate the offering of larger convenience store and café units which will serve the future residents of the residential development and wider community. The uses permitted under ABP-311181-21 are being retained. It is considered that the amendments to be retained accord with CPO 10.24.</p>

4.1.1 Childcare facility

The childcare facility permitted under the SHD application has been increased in floor area from 627 sqm to 672 sqm due to the reconfiguration of the ground floor of Block C. This is considered a positive amendment as it optimises space within the buildings floor plate and has the potential to provide additional childcare spaces, enhancing the facility’s capacity.

Chapter 7 of the WDCP 2022-2028 identifies childcare facilities as a vital component of social infrastructure, essential for supporting sustainable population growth and improving residents' quality of life. Specifically, Objective CPO 7.29 states that childcare places should be provided at a ratio of 20 places per 75 residential units.

The childcare facility providing a total of 88 no. spaces was originally permitted in Block C as part of the wider development under ABP-311181-21. The childcare facility was designed to cater for the entire Phase 1 development under ABP-311181-21. The current application does not propose any changes to the number of residential units permitted under ABP-311181-21. The expansion of the childcare facility is therefore considered a positive enhancement. It not only supports the childcare needs of the permitted development but will also accommodate potential future growth in the area. This improvement aligns with the Development Plan’s objectives by ensuring that high-quality social infrastructure keeps pace with residential development, fostering sustainable and well-serviced communities.

4.1.2 Car Parking Standards

The car parking standards within the WCDP 2022-2028 remain unchanged from the standards outlined within the WCDP 2016-2022, against which the original application, ABP-311181-21 was originally assessed.

The subject application proposes no changes to the permitted parking provision within the undercroft parking area which is as follows:

- 23 no. car parking spaces including:
 - 2 no. e-charging spaces
 - 1 no. disabled space
- 2 no. motorbike spaces

Following the relocation of the under-croft car park entrance, two additional off-street car parking spaces have been provided to the eastern side of the site, outside the building footprint of Block C.

Given the extensive availability of public transport options nearby, including bus and rail services, the on-site parking provision is considered adequate. This approach aligns with the maximum standards set out in Table 2.3 of Appendix 1 of the WCDP 2022-2028 and also supports and encourages sustainable travel patterns in the area.

4.2 Relevant provisions of the Bray Municipal District Local Area Plan 2018-2024

The permitted SHD was permitted in accordance with the *Bray Municipal District Local Area Plan 2018-2024* (BMDLAP). It is noted that the amendments to be retained are minor in nature.

4.2.1 Zoning Objectives

The subject site is zoned Mixed Use (MU) in the BMDLAP, with an objective “to provide for mixed use development”. Figure 4-1 below provides an extract of the Land Use Map within the BMDLAP which relates to the subject site. It is also noted that the subject site falls within lands with specific local objective, SLO3. It is an objective to develop these lands as a mixed commercial, residential, education / community facilities and open space zone.

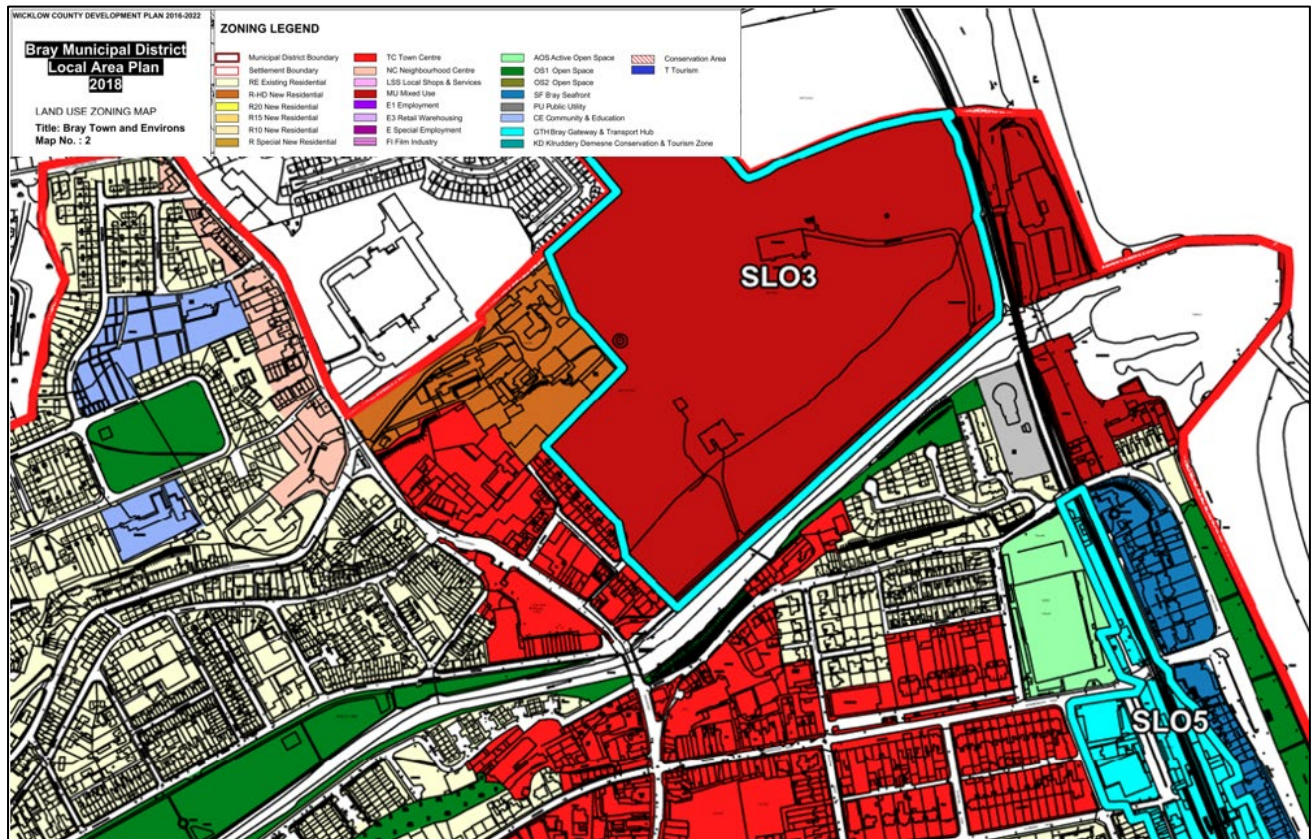


Figure 4-1: Extract from Land Use Map within the Bray Municipal District Local Area Plan 2018-2024.

It is noted to the planning authority that the relocation of uses and use mix, (café, convenience retail, childcare facility) does not alter the permitted uses on site. Therefore, the development will continue to deliver BMDLAP’s mixed use vision and objective associated with the relevant land use zoning.

It is further noted that one of the requirements associated with SLO3 outlines the following;

“Retail development shall be integrated into the development in a manner that flows from the existing retail core of the town and brings vitality and vibrancy to the streets and squares of the new development. Retail floor space (including retail services such as restaurants, hairdressers etc) of not less than 20,000 sqm (of which a minimum of 10,000 sqm shall be comparison floorspace) will be required”.

The reconfiguration and relocation of units and mix optimises the efficient use of space within the ground floor layout of Block C, which has been retained in the current design. This adjustment has expanded the convenience retail unit to 420 sqm, enabling a larger convenience goods offering within this phase of the permitted residential development, while also expanding the floor area of the childcare facility and the café originally permitted under ABP-311181-21. The amendments to be retained increase the retail floor space to be provided within this phase of the development and therefore, comply with the requirements set out in SLO3 of the BLAP. This adjustment ensures a more functional and responsive provision of retail amenities, better serving the needs of the residents while maintaining compliance with planning objectives.

5 ENVIRONMENTAL CONSIDERATIONS

5.1 Environmental Impact

The making of this alteration as described above will not materially alter those impacts identified in the Environmental Impact Assessment Report (EIAR) and assessed in the Environmental Impact Assessment (EIA) submitted with the planning application under ABP-311181-21. No new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for application under ABP-311181-21.

5.2 Appropriate Assessment

It is considered that the alterations to be retained, individually or in combination with other plans or projects, would not be likely to have a significant effect on the European sites in view of the sites' conservation objectives and would not warrant an Appropriate Assessment.

6 CONCLUSION

Having regard to all the foregoing, it is respectfully submitted that the amendments to be retained are modest in nature with no implications for any notable altered environmental or planning impacts. The alteration of the parent permission to relocate the vehicular entrance and reconfigure the internal ground floor arrangement provides a more efficient use of space, prioritising the future residents of the area through the provision of a larger childcare facility, convenience store offering and café. The amendments to be retained are in accordance with the principles of the development previously permitted by An Bord Pleanála Ref. ABP-311181-21, and are consistent with the policy, objectives and standards set out in the WDCP 2022-2028 and the BMDLAP.

The amendments outlined in the subject application will allow for the timely occupation of developed granted thereby assisting in the achievement of national housing targets for the country. In conclusion, it is considered that the amendments to the parent permission are in accordance with the proper planning and sustainable development of the area and as such should be granted permission.