

Bray Retailers Group (BRG)

9<sup>th</sup> November 2017

Dear Sir/Madam,

Herewith our submission for consideration re 2040. Our plan, BRG has an addendum to that submitted to W.C.C./Bray Lap 2017/2023

BRG considers that the proposals are:

- 1) Sustainable
- 2) Holistic for the town at large
- 3) That Bray's municipal District (Bray/Kilmacanogue/Enniskerry)  
Could grow from 35000 pop. to over 50000 pop. and avail of funding through the E.U. urban areas pact of Amsterdam
- 4) Conducive to the mantras of 10/10 or 15/15 etc, (availability/walkability) with regard to public transport becoming attainable in the Bray area
- 5) The orbital route with the opening of the fourth arm at Wilford Roundabout and other suggestions would ease traffic congestion by rebalancing the flows at the Bray north and south N11

Yours faithfully,

Liam McGarry (Secretary\*)



BRG :-

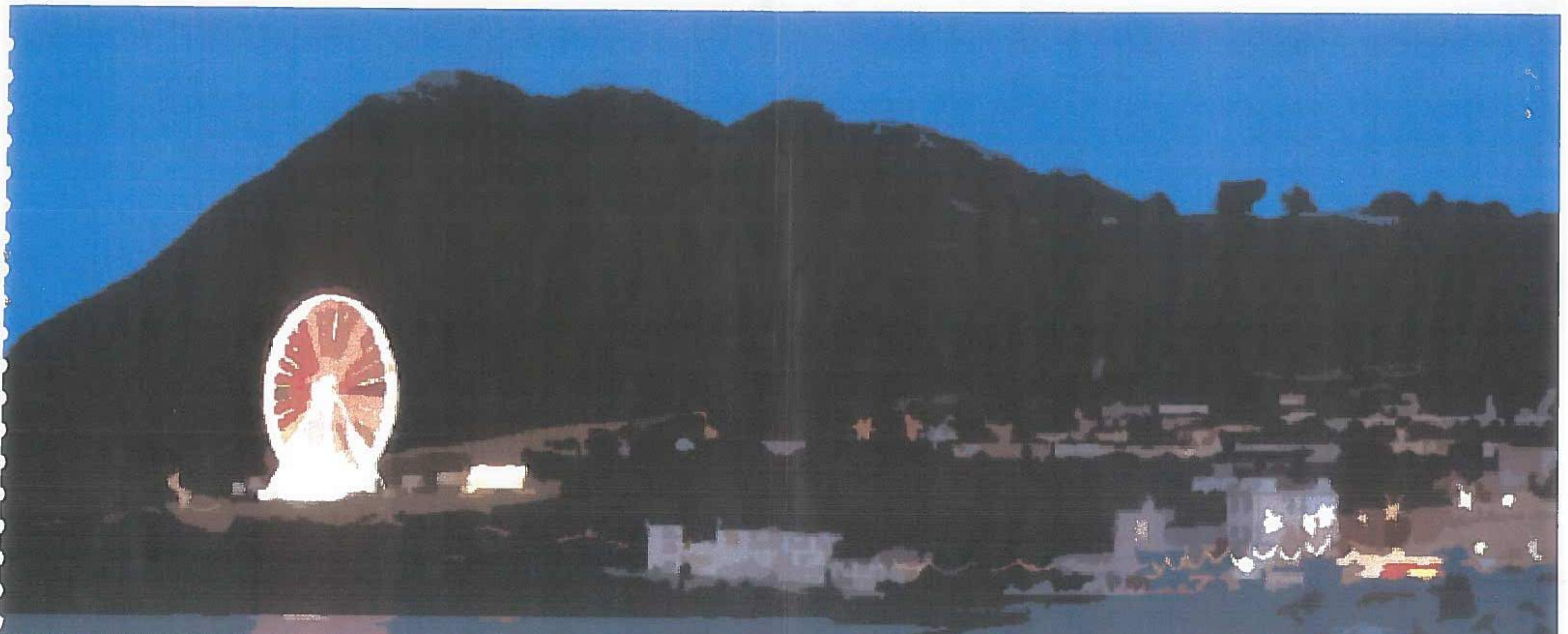
Frank Power c/c [REDACTED]

Liam McGarry c/c [REDACTED]

ML. Bannon (Jnr) [REDACTED]

John Keyes [REDACTED]





SUBMISSION BY BRAY RETAILERS GROUP (BRG)

DEPARTMENT OF  
HOUSING, PLANNING  
AND LOCAL GOV-  
-ERNMENT.

IRELAND  
2040  
OUR PLAN.

Prepared by

**TOTP** Architects  
The O'Toole Partnership

BRAY RETAILERS GROUP (BRG)



# PREAMBLE

The preamble of the draft Local Area Plan states that the role of the land use plan is to put in place a framework within which development can occur in the Bray Municipal District.

The development of the Bray Municipal District Local Area Plan 2017 – 2023 comes at a time when Ireland has recovered from its worse financial crisis and when the nation is preparing for a new course of sustainable economic development and growth.

Four trends will impact on the future economic activity in Bray namely:

- the future growth patterns of Dublin city and its commuting areas;
- the digital revolution;
- the future arrangements in the European Union including the consequences of Brexit;
- the resilience (or lack of) of local urban areas in the wake of climate change.



Bray is well positioned to benefit from the continued growth of the Dublin Metropolitan Region. Significant more housing projects should be expedited given that the shortage in supply will last for the implementation period of the Local Area Plan. The changes in the European Union with the forthcoming exit of the UK could stimulate new demand for commercial space from companies requiring launchpads into Europe. Bray should stake its claim as a favourable option given its location close to the capital as the gateway, its relative affordable cost of living and the pro-business environment facilitated locally and nationally.

The business environment will however change as the digital revolution takes full effect. It is foreseen that pure online retail will take significant market share across all sectors, which can only be offset by other growth factors such as higher margins and population increase. A more sustainable retail scenario will be to facilitate the increase in clicks-and-mortar retail offerings on existing footplates, where residents will be able to buy online and collect in the shop. Some research in the UK is showing a secondary buying behaviour where customers who collect also buy other items in the shop. The traditional model of expansion of retail floor space in correlation with population growth is however not valid anymore. At best the aggregate of existing retail uses should be retained while the allocation of new retail uses should be curtailed.

How Bray responds and competes in this regard is in our hands as the larger community and institutions of the Bray Municipal District.



The traditional status of Bray as a regional shopping destination has diminished over the past twenty years as new shopping destinations came on stream within reach of the North Wicklow catchment area. The future of retail in the Bray town centre will firstly depend on the liveability of the town centre, meaning that the rate of increase of the population within walking and cycling distances of 10 minutes to the centre will be a key consideration for businesses to invest in the changes and improvements to their retail offer in the centre. Secondly, the improvement of access to the town As defined by Eurostat.



Many town centres and high streets in the UK and Ireland continue to experience depressed sales with the growth of online retail and the presence of out-of-town malls and retail warehouses. centre will be a critical factor to entice car drivers to do their shopping in Bray. Retailers are concerned that little progress has been made to alleviate traffic congestion on the north-south arterial route and furthermore, they anticipate that with the future developments in Fassaroe, more urgency is required to put in place adequate east-west arterial connections to the centre.

The Bray Retailers Group is well aware that the car dependency in Bray as evident from the latest Census statistics is unsustainable. Therefore, the pro-active installation of new mobility systems such as bike-share and feeder services to the main public transport hubs, is strongly supported by the Group.

As citizens of this world, we are all responsible in our town to change our behaviour to slow down climate change by changing our local economy to a low carbon economy. This requires changes to our transport modes and shifts in how we use and produce energy. It should be reflected in the changes of our physical environment to facilitate such desired changes in behaviour. We also will have to accept that the effects of climate change are upon us. The more extreme local weather episodes for example cannot be managed anymore as once in a lifetime (50 years or 100 years) risks. We will have to have more comprehensive resilience strategies. How will we deal with hurricane-force winds and storm surges, droughts and forest fires which we are not accustomed to? Our sustainable development agenda should be shaped to be first and foremost in our policy frameworks.



It is also clear that in the European Union sustainable urban development is a policy priority. This is evident from the New Urban Agenda of the European Union, also known as the Pact of Amsterdam, adopted in June 2016. 'Urban areas' with a population of 50,000 and upwards will become the focus for funding of urban innovation ranging from mobility solutions to smart city initiatives. The Bray Retailers Group urges that serious consideration be given to increase the population in the Municipal District from 35,000 in 2016 to reach 50,000 by 2026. This will require higher densities than suggested in the Wicklow Development Plan and the draft Local Area Plan.

The rejuvenation of the Bray Main Street is an ongoing project that follows the vision of a new urbanism evident in Europe and other parts of the world. The draft Local Area Plan recognises the importance of a set of actions and continued commitment of various role players to change the town centre through urban design and placemaking initiatives. In this sense many towns in Europe of similar size serve as great examples.

The Bray Retailers Group is optimistic that we have the capacity to grasp these opportunities and deal with the challenges to steer the development of our town for the benefit of future generations.

Herewith specific proposals to parts of the draft Bray MD Local Area Plan:  
See for example the EU's Urban Innovative Actions Initiative with a fund of €372m for authorities to tackle urban challenges.





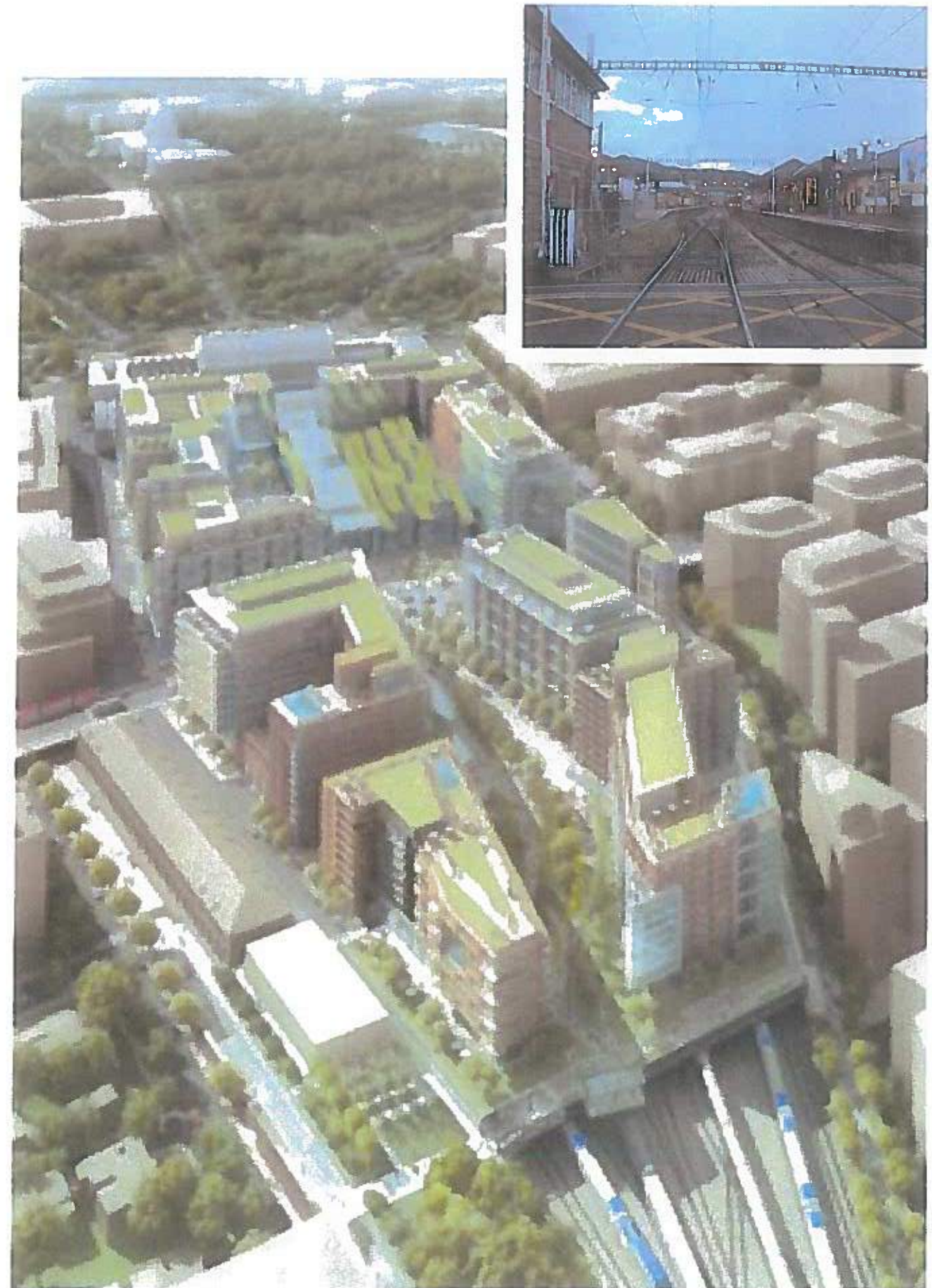
# Chapter 8: INFRASTRUCTURE

## 8.1 Roads and Transportation

The draft Local Area Plan proposes a number of Public Transport and Road Objectives with which the Bray Retailers Group concurs. In particular the Group wants to see the Local Transport Plan for Bray and Environs being developed by the NTA to comprehensively alleviate the chronic traffic flow and congestion problems which are so detrimental to Bray's progress and economic wellbeing.

The Bray Retailers Group advocates a paradigm shift to facilitate a better flow of traffic and to include the following:

- To increase the number of roundabouts on its arterial spines from the existing ten to twenty, in particular on the Wilford to Wilton spine; the Killarney Road to Kilmacanogue spine; the Wilton to Hills Garage spine; and the Castle Street to Enniskerry spine. Attached please find a map explaining the proposed locations of these roundabouts.
- To change the traffic management system in the town centre by directing traffic to always turn left and to prohibit right turns 'against the oncoming traffic' which causes most of the congestion. This will ensure users proceed to the next roundabout to turn back into the opposite direction so as to be able to 'turn right'.
- To have a general speed restriction of 30km/h in Bray town, with clearly identified roads where the speed limit can be relaxed to 50km/h. These limits are not only to promote road safety, but will actually contribute to better flow. It will also encourage more cycling.
- To build a new dual carriage way from the Wilford roundabout to a new roundabout at the Castle St Shopping Centre entrance/Dwyer Park.
- To introduce a one-way system, like the loop from the Main Street onto Quinsborough Road onto Florence Road back to the Main Street, by taking traffic south up the Vevay Hill onto Church Road and connecting again with Killarney Road. This will alleviate pressure at the convergence of Killarney Road and Vevay Road by diverting traffic coming from the southside onto Church Road. See attached map.





Bray furthermore needs to leverage its high quality public transport connections. The Bray Retailers Group proposes the development of a new transportation hub at the Carlisle grounds and siding area that will accommodate one main intercity railway line linking Bray to Rosslare Europort, two DART lines, one LUAS line, a bus terminus and coach bays for public and private operators. It should include sufficient multi-story parking for cars and bicycles to facilitate park-and-ride.

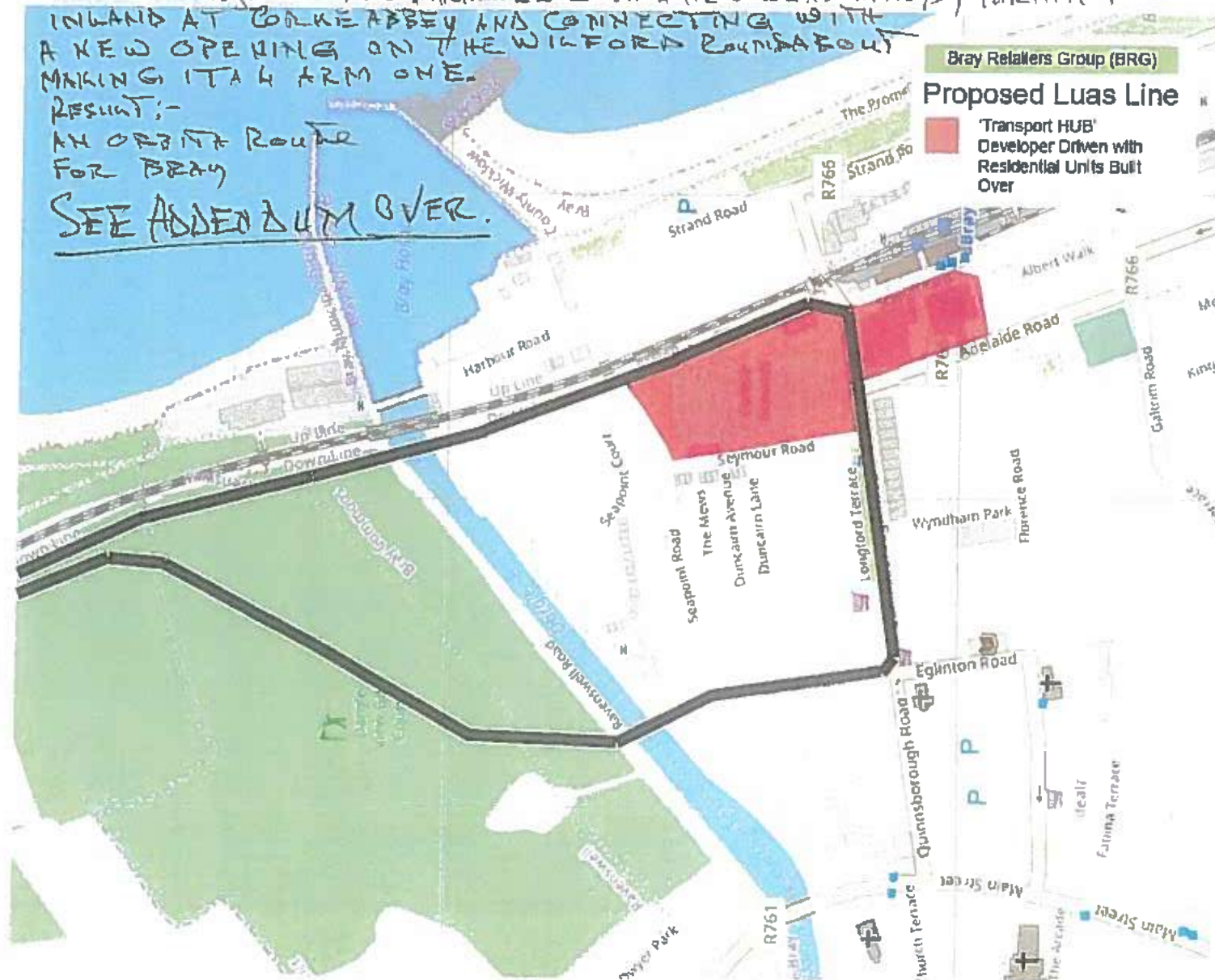
The redevelopment of the existing lands encompassing the Carlisle grounds, Bray train station and the adjacent warehousing/commercial sites should be a mixed-use with significant residential and some commercial elements and could involve the consolidation of the aforementioned land parcels. These developments should be built over the transport tracks, bays and roads. The aim should be to get up to 900 units into this footprint.

The transportation hub should also be well connected with the Main Street and with the northside of the Dargle River. A new road and bridge should link the hub with the developments on the old golf course and continue as an arterial route to a new roundabout at the crossing of Quinsborough Road and Adelaide Road, AND CONTINUING THE ROAD NORTHWARDS; WITH IT RUNNING ADJACENT AND PARALLEL WITH A NEW LUAS LINE/S, TURNING INLAND AT COLKE ABBEY AND CONNECTING WITH A NEW OPENING ON THE WILFORD ROUNDABOUT MAKING IT A 4 ARM ONE.

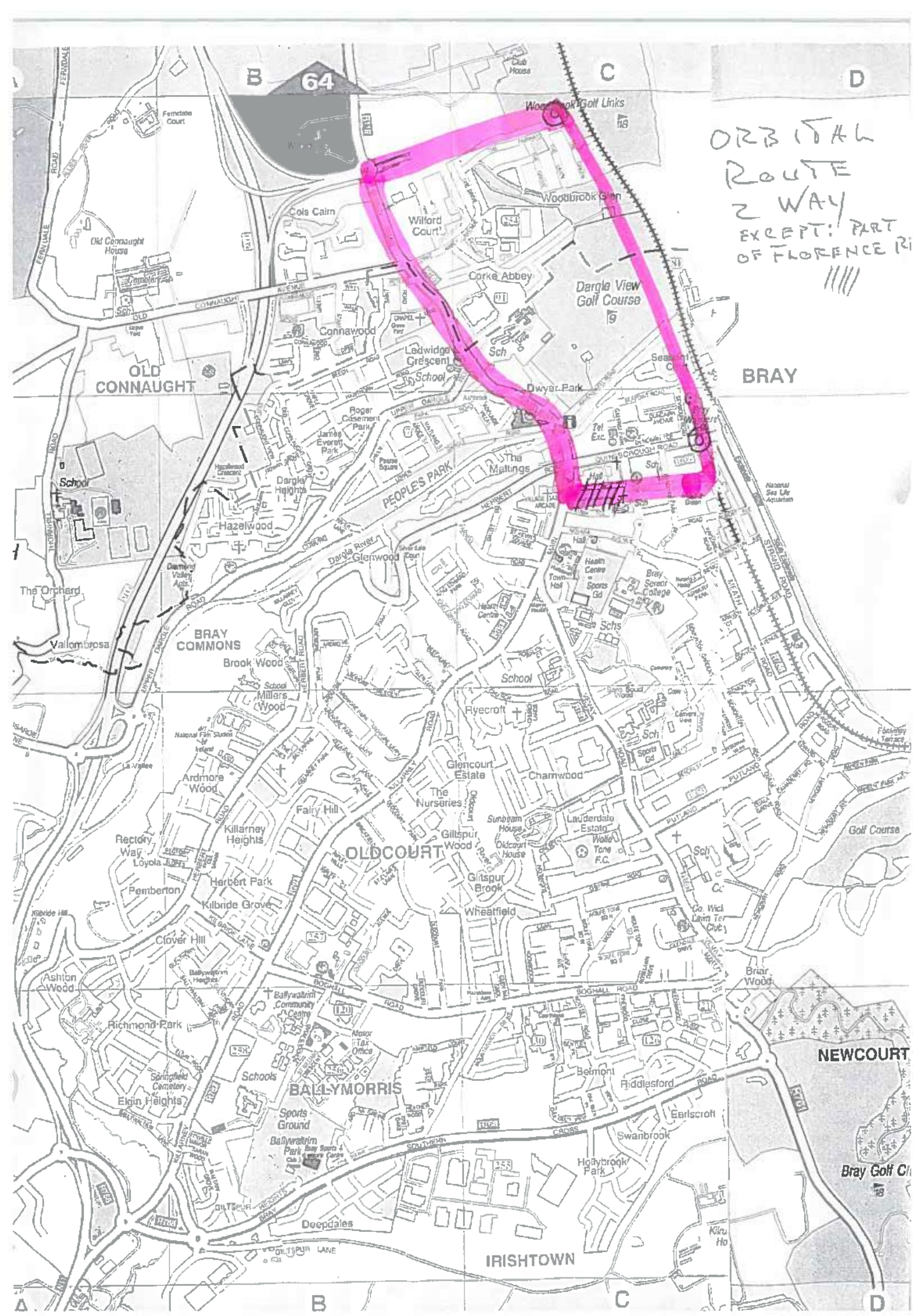
RESULT:-

AN ORBITAL ROUTE FOR BRAY

SEE ADDENDUM OVER.





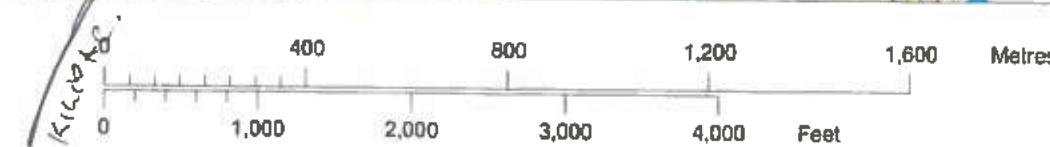
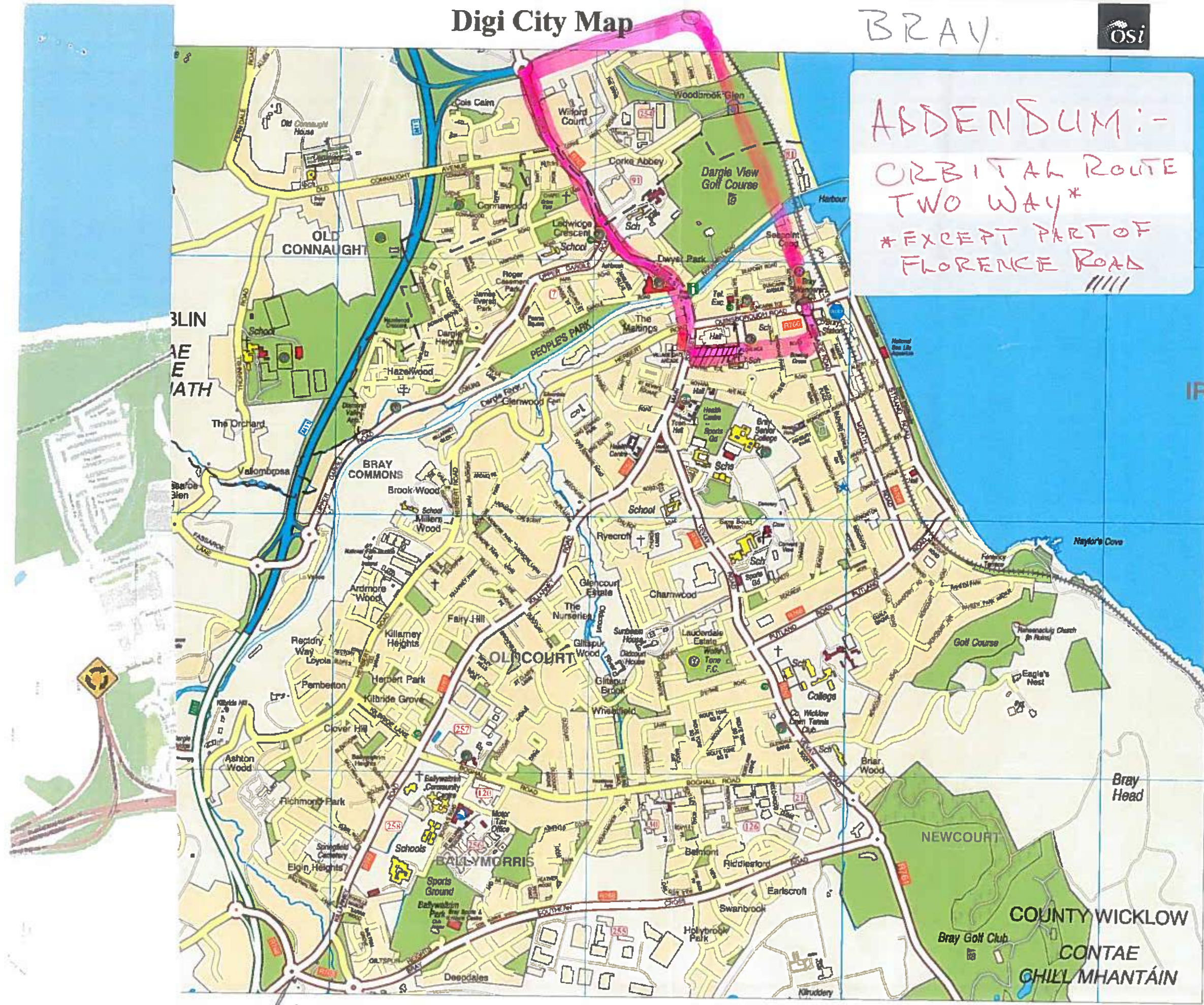


ORBITAL  
ROUTE  
2 WAY  
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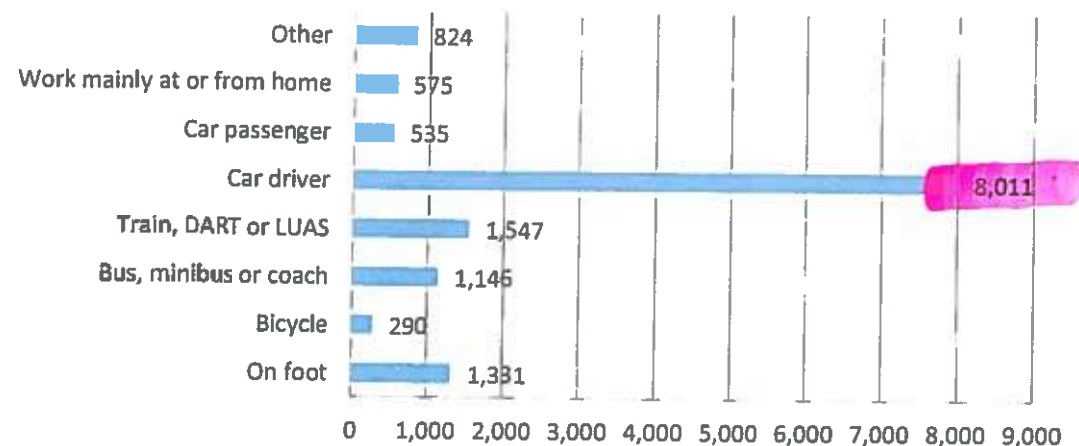
ADDENDUM:-  
ORBITAL ROUTE  
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\*EXCEPT PART OF  
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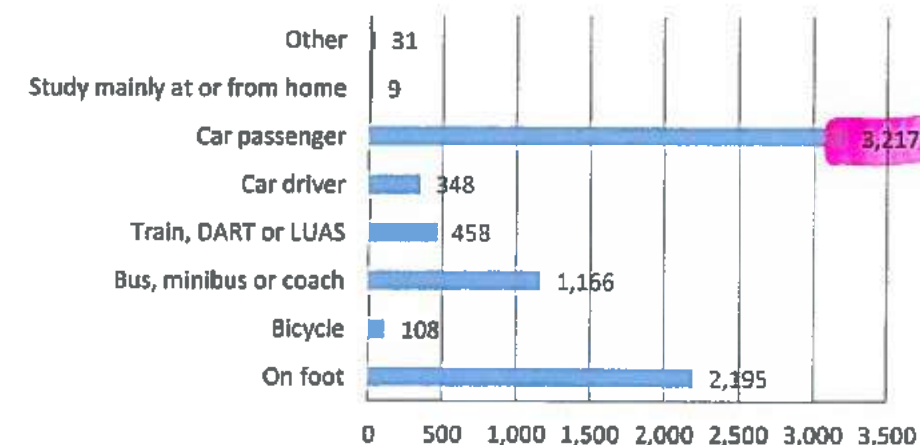
The Group believes the new transportation hub will enable a much better uptake of public transport compared to the disappointing Census 2016 statistics. See chart below:

### Bray: Mode to Travel to Work



It is evident that the preferences of families to take students and children to school by car far outweigh more sensible travel modes such as travelling by bus, cycling or walking. This may be the result of perceptions that it is unsafe to travel by bike. The proposed lower speed limits should help but it is further proposed that the Cycling and Walking Objective CW2 should be emboldened to include a survey of existing cycle ways and routes to schools and to determine improvements of cycle lanes and restrictions on other modes of transport (right-of-way signage and bylaws for example) to encourage more children and students to cycle. See chart below:

### Bray: Mode to Travel to School



The Bray Retailers Group proposes that all organisations in Bray and environs as well as in neighbouring counties work together to reprioritise the extension of the LUAS to Bray. For the Dublin Metropolitan Region, the logic will be that the LUAS also connects to the DART at a gateway as per the proposed transportation hub above, to ensure that much larger volumes of commuters are accommodated in future to use a mix of public transport modes.

The Group would like to see a bold approach to route the LUAS through Bray. The proposed route could be for the LUAS to enter Little Bray via the Shankill/Shanganagh axis and continue to the proposed transportation hub at the Carlisle grounds. The line could then leave the transportation hub and go up the Quinsborough Road and turn north in Galtrim Park and over the Dargle at a new LUAS plus pedestrian and cycle bridge to loop back to the north-south line coming from Shankill. New LUAS Stations close to the crossing of Quinsborough Road and Galtrim Park as well as a station close to the new schools on the golf course will significantly increase the connectivity of the Town Centre to the multi-modal public transport system. See the attached map.



# Chapter 5: TOWN/ NEIGHBOURHOOD CENTRES & RETAIL

## 5.1 Town Centre Objectives

The Bray Retailers Group applaud the emphasis on the continued vibrancy and life of town centres and the active use of above ground floor levels contained in the Town Centre Development Objectives TC1 to TC5. The Group however questions the rationale to significantly expand convenience and comparison retail floor space in the county and to specifically target 77,000m<sup>2</sup> for Bray as a Metropolitan Consolidation Town. The logic seems to be that with an increase in population more retail space is needed. The changes in consumer behaviour brought about by online retail options, put these assumptions to question. Of more importance is the consolidation and revitalisation of existing retail streets and centres.

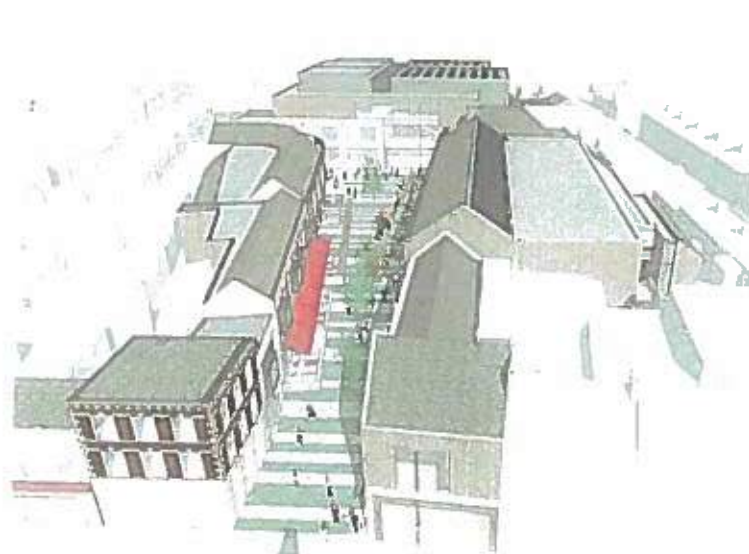
In this regard, to enable major retail floor space in the former golf course lands as stated in the Bray Town Centre Specific Objective BT2 contradicts Specific Objective BT1 and should be modified to allow for local convenience retail and services serving a new residential neighbourhood.

The height restriction on Bray Town Centre as per Specific Objective BT3 is also a perspective from a different era. For Bray Town Centre to be an attractive destination today will require more population living closely or in the town centre. The centre should resemble an urban form of a small city rather than a rural town. The important element is the vibrancy of the place at eye level rather than if it is 3, 4 or 5 stories high. It is proposed that the emphasis is on the intensification of land usage (mixed) in the town centre zoning without a height restriction and that each planning application be judged on its own merits.

## 5.4 Bray Neighbourhood Centres

The Bray Retailers Group agrees with the designation of neighbourhood centres on the Vevay Road, the Southern Cross Route and the new development in Fassaroe. The Group proposes that the redevelopment of the Bray golf course lands should include a neighbourhood centre and not a town centre designation. The development of neighbourhood centres should be on a scale commensurate with the convenience shopping needs of the local residential areas being served. In adherence to the Town Centre Objectives, comparison retail should be restricted in neighbourhood centres.

As stated above, the rationale for doubling the retail space in Bray to 77,000m<sup>2</sup> is questionable and clearly will be unsustainable if the current infrastructure is not significantly expanded, which in relation to the topology and the pattern of the built environment in the town, is highly unlikely.



## 5.5 Bray Opportunity Sites

The Bray Retailers Group is confident that the development as proposed for the Florentine Centre in Opportunity Objective OP1 will significantly enhance the destination for shopping and leisure in the Main Street and Town Centre.

Furthermore, the opportunities for development of premises on and off Castle St as expounded in Opportunity Objective OP2 and OP3 should be fully grasped to change the area into a high quality high density residential and mixed-use built environment. The notion of 3 to 4 storey development is again pandering to a modest view of growth, when these are the sites well positioned for significant density on a path of more sustainable development.

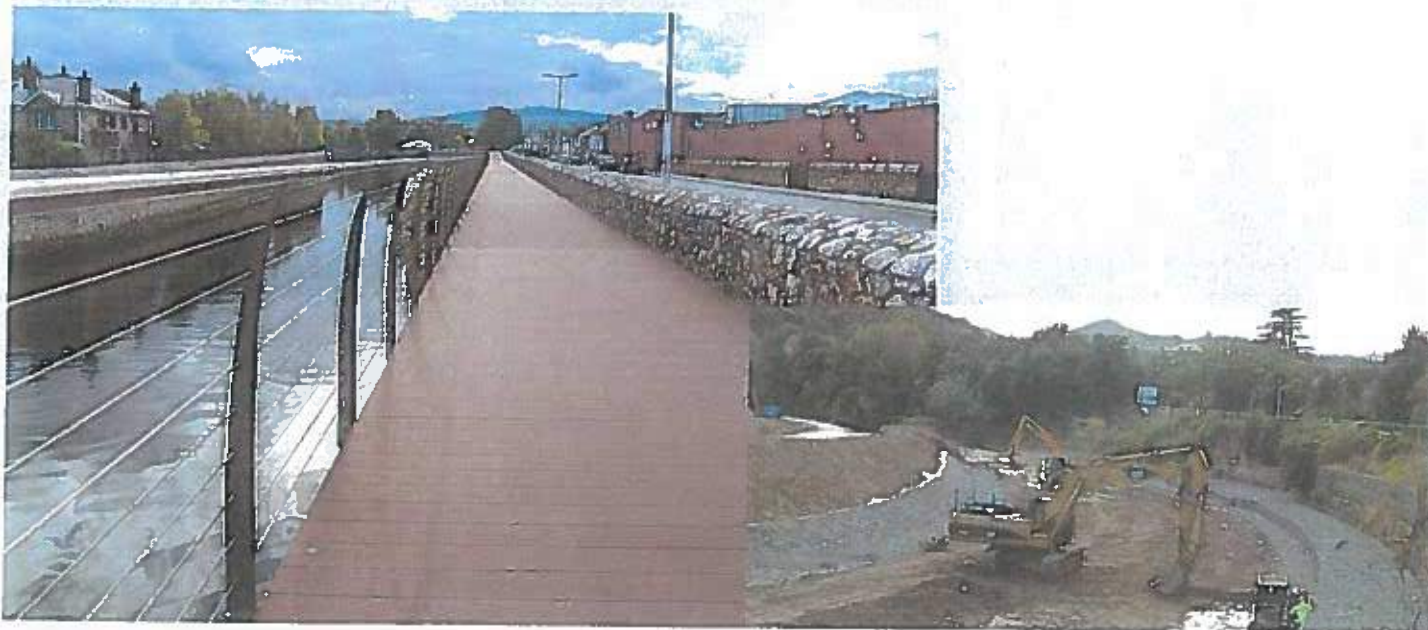


# Chapter 10: KEY DEVELOPMENT AREAS

The Bray Retailers Group is in agreement with the zoning of the land reserve in Fassaroe for future residential development. The priority however should be to progress the redevelopment of the above-mentioned opportunity sites on Castle Street and the development of the golf course lands. These new residential developments should be on condition that the necessary infrastructure is in place.

The Specific Local Objective for the development of the golf course lands should include a restriction on development of a green area reserve on the river embankment to protect the new residential development from future flooding risks. The reserve should be part of the Dargle River linear park which increases amenity to the area.

Given that residential development will have to be significantly set back to accommodate flood protection, it follows that the density should increase on the lands suitable for residential development. Again, it will not make sense to force a height restriction, but it will be more sensible to judge every planning application on its own merits.



## 2.2.4 Economic Development and Employment

The Bray Retailers Group concur with targets set in the draft Local Area Plan to significantly increase jobs growth in the town centre and in existing employment sites.

In relation to the Specific Local Objective SLO 6 which signifies employment lands between the Boghall Road and the Southern Cross Route, it is proposed to create a Strategic Development Zone with a focus on Life Sciences and to gear the proposed developments in such a SDZ towards investments in this field that could yield up to 1,500 jobs. The location is convenient both with good access from the N11 as well as with the possibility for employees to avail of more affordable accommodation in the vicinity. This could also be a valuable real estate option for the IDA to present to investors in the light of Brexit.



## CONCLUSION

The development of the Bray Municipal District Local Area Plan is a window of opportunity for residents, businesses and institutions in the town to embrace change and to set a path for the future growth of our town by showing our ambition to build and improve our urban built environment and by leveraging our strategic location.

In this submission, the Bray Retailers Group highlighted four challenges which if addressed will propel the development of our town:

- **Significant increase in population close to the town centre**
- **Significant improvement of traffic flow to and through the town centre**
- **Maintaining the retail hierarchy and the prominence of the Bray town centre as the primary retail destination in the Bray Municipal District; and**
- **Promotion of Bray as a location for FDI and indigenous investment to yield a significant increase in the number of jobs in the Municipal District**

The Bray Retailers Group is looking forward to engage with all other stakeholders in the town to discuss the positions taken in this submission.

