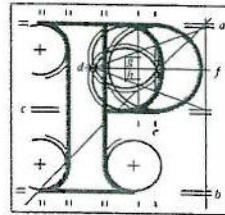


Our Ref: ABP-303726-19



An
Bord
Pleanála

John Hayes
1 Seaview Avenue
Wexford
Co. Wexford

Date: 12th April 2019

Re: A mixed-use development which includes a six-storey hotel, six-storey car park, five-storey residential building, three five-storey office buildings, two-storey cultural/performance centre, two-storey mixed-use restaurant/café/specialist retail building, new sea wall around the existing Trinity Wharf site, 64 berth floating marina and all other site infrastructure works and ancillary works. Trinity Wharf, Trinity Street, Wexford.

Dear Sir

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Wexford County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Fergal Kilmurray
Executive Officer
Direct Line: 01-873 7247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

1 Seaview Avenue
Wexford,
Co. Wexford
Y35 V2T1

AN BORD PLEANÁLA	
LDG-	<u>014666-19</u>
ABP-	_____
01 APR 2019	
Fee: €	<u>50</u> Type: <u>card</u>
Time:	<u>11:14</u> By: <u>hand</u>

April 1st, 2019

Subject: Submission made by **John Hayes, 1 Seaview Avenue, Wexford, Co. Wexford** and on behalf of the residents of Emmet Place, Trinity Street, Trinity Place, Fishers Row and William Street as listed.

Re: Proposed development at Trinity Wharf, Trinity Street, Wexford, Co. Wexford – Case Reference PL303726

Dear Sir/ Madam,

We wish to submit our observations on the proposed development at Trinity Wharf, Trinity Street, Wexford, Co. Wexford – Case Reference PL303726, relating to the consequences of the proposed development. In advance, we would like to make it clear that the majority of residents that we have spoken in the local area agree that development on the site is desirable and would be beneficial as long as it:

- is completed in consultation with the communities impacted by the development
- is integrated with those communities (not forced on them)
- is sustainable in the long run (in terms of traffic, utilization of the site, amenities available to local groups)
- is in character with the existing area
- is safe for all citizens (whether in vehicles, on foot or cycling)

With those caveats in mind here are the observations as agreed by the residents committee and attached signees:

1. Unsustainable/Overdeveloped nature of the proposed development

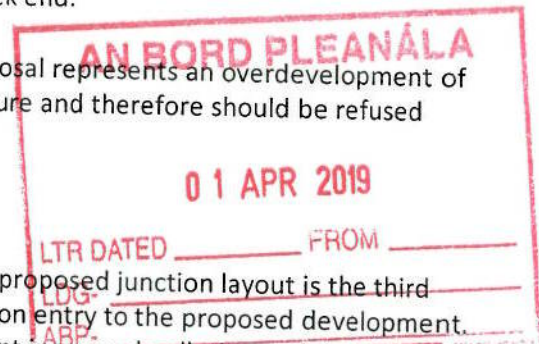
As per Wexford County Council's own submission the site will host 1,200 office jobs when complete. Similarly, the Council's own survey supplied with the proposal indicate that 58% of Wexford residents drive to work. The Council's own figures therefore indicate that 696 spaces are required to cater solely for employees on the site. Adding the mandatory spaces allocated to residents (58), the minimum amount of spaces required to grade the 120-bedroom hotel at a 4-

star level (40) results in a total of 794 spaces. This is a shortfall of 285 spaces on site, which is almost in excess of the total maximum number of spaces identified in the Council's own survey of all available spaces within a ten-minute walk (Chapter 5 – Traffic Analysis). Given that the survey referenced by the Council was carried out three years ago at a quiet time of the year (November 2016) it is reasonable to assume that the number of available spaces in this ten-minute area is now considerably lower. In addition, there is no provision on site for the parking of coaches servicing the hotel/ cultural centre/ offices etc., no allowance for the impact of daily deliveries, drop-offs, HGVs (estimated by the Council to be just under 30 visits per day) or taxi journeys to and from the site.

Also not included in the on-site parking requirements is the fact that the proposed 400-seat Cultural Centre, retail/ restaurant space and marina have no car park spaces allocated – rendering them either unusable from 8am-6pm Mon-Fri (when the 1,200 employees are on site) or preventing the office workers from working in the evenings or at week-ends. This is counter to the planning guidelines laid out by the Department of Environment, Heritage and Local Government (2009), which state that any urban development should 'promote the efficient use of land'.

Wexford County Council's own submission that a full parking allowance for the 120 rooms in the hotel will only be needed outside of business hours clash with the reality that hotels in Ireland are currently working at over 90% capacity (Irish Times, Jun 20 2018 - 'Boom time at Irish hotels as occupancy exceeds 90%'). In addition, the Council's statement that conventions are mainly held at week-ends is demonstrably erroneous, with a sample of previous conferences held (held by INTO, Garda Representative Association, Irish Planning Institute, ASTI etc.), all being held either during week days or from a week day into the week end.

Given the above points it is our submission that the current proposal represents an overdevelopment of the site and is unsustainable in the context of current infrastructure and therefore should be refused permission as currently planned.



2. Traffic - Suitability and Safety of Proposed Junction

- a. As per Wexford County Council's own submission the proposed junction layout is the third choice and justified only by the view it would provide on entry to the proposed development. Elevating the importance of a view over the consequent increased pollution and decreased traffic safety associated with the proposed junction is contrary to good sense and as such the third junction option should be refused.
- b. As residents we would submit that the original, existing entrance represents the safest route to the site as the proposed entrance represents a clear danger to young children who currently play in the Seaview Avenue/Trinity Street area, and to pedestrians crossing the entrance of Seaview Avenue. By Wexford County Council's own submission, the first option for entry/exit from the site – the existing site entrance – “was the most practical option, providing a gradual slope to a new railway level crossing, with least impact visually and in terms of engineering works.” (Chapter 3 – Alternatives Considered). As this would be the preferred option in terms of practicality, safety and traffic flow this option would represent the common interest. As this is exactly the function of Wexford Council's power to

compulsorily purchase and given the small area of property involved (approx. 7 metres according to the Council's own submission – Chapter 3 - Alternatives Considered, pg. 19), we would question why this option has not been pursued.

- c. Under the proposed traffic management plan the vehicular access to Seaview Avenue for anything larger than a car (e.g. bin lorry, oil delivery, emergency vehicles) would have to reverse in to the avenue against traffic which has been given a green light to proceed. As per Road Traffic Regulations (S.I No 182/1997 Section 12) "a driver shall ensure that to so reverse would not endanger other traffic or pedestrians". We would question how Wexford County Council envisages the new system might impact on drivers who have no choice but to reverse into Seaview Avenue, how this would impact on those road users trying to proceed on a green light and how their safety can be guaranteed.
- d. It is our submission that the proximity of the main junction at Fishers Row/ Trinity Street to the proposed new junction – approximately 60 meters – is too close to the proposed junction and will negatively impact traffic flow in an already restricted area.
- e. Vehicles exiting Seaview Avenue would have no view to pedestrian or vehicle traffic coming from the North side of the proposed junction due to existing dwelling houses. The lack of suitable sight lines will greatly increase the chance of accidents and – especially – pedestrian collisions (e.g. children walking to the local primary school).
- f. There is no pedestrian pathway for residential access/ entry to Seaview Avenue included in the proposed plan. Therefore, existing residents of Seaview Avenue will be forced to walk through an active traffic zone to enter/ exit their Avenue. This is contrary to any good design and ignores even the most basic of safety standards.

It is our submission therefore that the proposed junction is unsafe, ignores the needs of current residents and road users and therefore should be rejected.

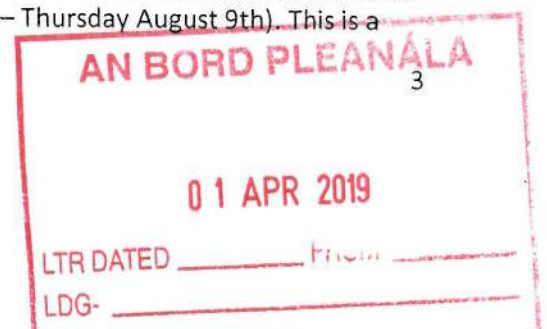
3. Traffic – Impact on current residents for parking

The removal of current on-street parking for residents of the area (16 spaces from Trinity Street plus 2 from Seaview Avenue) would be a catastrophe for residents of the area, most of whom either have young families or are elderly. The proposed changes to the street layout have been bought in with no consultation with the local community, with emails and submissions addressing this issue not being answered.

It is our submission that if granted the proposed turning head for Seaview Avenue be altered to accommodate 4 car parking spaces for residents of Seaview Avenue, and that the current parking spaces at the green area on Trinity Street be reoriented to a herring bone formation. While both of these proposals require the loss of some green space, they will alleviate the impact of the loss of other spaces and make the existing pedestrian and vehicle movement safer.

4. Traffic – unsustainable additional users added to an already congested area

- a. It is the view of the residents that the reliance of the Councils' report on ATC measurements ('Traffic and Transportation Report' submitted by Wexford County Council) should be viewed with a high degree of scepticism, given that they were carried out over a period that covered the August Bank Holiday week-end (Thursday August 2nd – Thursday August 9th). This is a



period of time in which there is reduced flow of traffic to/from the town centre due to severe congestion – as a concrete example of the impact that this has on local residents Wexford Bus (one of the transport links listed by Wexford County Council as being a transport provider to the proposed development) suspended their approach from the south of the town along William Street, Trinity Street and onto the Quays for the whole of August 2018 due to the level of congestion on the road and the impact it had on journey times (20 mins to drive the length of Trinity Street would have been normal).

- b. August is also a time of the year that ignores the impact of traffic from the St. John of God Faythe School - a DEIS designated primary school situated less than two minutes' walk from the proposed development and which brings peak traffic flows into the area at school opening/ closing times - these coincide with potential rush hour traffic leading to the proposed development, particularly in the morning.
- c. The submitted 'Traffic and Transport' report also completely omits two of the main access points to the area affected – William Street Lower and Fishers Row. Both of these streets are main feeder roads to Trinity Street for traffic approaching from the South of the development. At present William Street Lower is continually congested, with traffic parked on both sides of the road and no central median space available (at present it is almost impossible for two HGVs to pass each other on this section of road). It is normal practice that cars on the east side of William Street Lower have to park partially on the footpath in order to minimize the risk of damage to vehicles from passing traffic. Fisher's Row has parking on one side only and a single lane to accommodate two-way traffic. Fishers Row also contains a side entrance/ exit to the St. John of God Primary School, which is actively used by a large number of pupils on a daily basis.

It is our view therefore that current traffic volumes have been underestimated and that the proposed development will only add an unsustainable amount of traffic to the already congested area of William Street, Trinity Street, Parnell Street, Fishers Row and the Faythe. In addition, it is our submission that the current proposal is incomplete and therefore should be rejected, and that any future report contain a detailed analysis of the impact of increased traffic on William Street (Lower and Upper) and Fishers Row and the current capacity and challenges of those areas.

5. Construction phase – impact on residents

It is our view that the proposal lacks sufficient detail with regard to traffic and parking management (for existing residents and for potential construction workers), site management, noise pollution, dust pollution and construction work during the building phase of the project. In addition, the estimated construction period of 80 months would cause extreme inconvenience for all residents in the vicinity over a prolonged period of time and seems to be grossly excessive for a project of this scope (as a comparison both LUAS lines in Dublin were completed in a little over three years, the National Convention Centre was completed in 40 months).

It is our submission that as with other developments in the town (e.g. the proposed River Bank Hotel, the Council's work on the National Opera House and on Whites Hotel) a detailed plan covering these requirements should be completed and agreed in consultation with the local community in the event that the proposed development, or any other future development, commences on the Trinity Wharf site. Further it is our submission that in order to safeguard the residential amenities in the vicinity:



- site development and building works shall be carried out only between the hours of 0800 to 1800 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays (in line with other proposed large-scale developments in Wexford town)
- Wexford County Council shall be directly responsible for ensuring the cleanliness of the site and surrounding areas during construction, with a full clean of all surrounding approaches occurring on a weekly basis
- Wexford County Council shall provide a direct contact for all residents in the immediate area in case of disputes, emergencies etc.
- Wexford County Council shall provide any businesses or work-from-home residents with alternative office space during the construction phase if required (office spaces shall be lockable and private, fully secured and provisioned with telephone, fibre-broadband and any other amenities existing in the current work spaces)
- Wexford County Council shall ensure adequate parking provision is made for all existing residents in the immediate locality during the construction phase
- Wexford County Council shall ensure that the notional 1,700 people that will be employed during the construction phase will have adequate parking provision in a manner/ place that does not impact existing residents in any way
- For any period of works exceeding three years a full compensation scheme be set up for residents in the immediate/ neighbouring areas, with specific compensation to be decided by an independent arbiter, for whom Wexford County Council shall bear all costs.

6. Unsympathetic to the existing area

The visual amenity of the Trinity Street, Seaview Avenue, William Street district will be permanently damaged by the proposed development. Many of the current dwellings have been in place since the mid 1800's and follow a standard template of traditional two up/ two down, slate roofed terraced houses. The proposed development would have overbearing impact on this historical area of the town and is out of place with the existing streetscape.

Therefore, it is our submission that permission to build be refused at the proposed height.

7. Lack of facilities for the existing community

There are no facilities for the immediate community – described in the Council's own submission as being a 'deprived area' – included in the proposal, despite requests for this to be included (via email and online submissions). At the moment there is only one small playground located almost 1 kilometre away, which caters for the entire population of South Wexford Town. The proposed development should ideally add to the existing amenity value of the area in terms of playground /amenity provision but instead will only add an extra burden on existing amenities.

It is our submission that if the proposal is granted permission the site of the old Cash and Carry be designated in perpetuity as a playground/amenity area for the benefit of existing and new residents (e.g. a small mixed-use recreational area). Further it is our submission that whatever amenity is agreed with the Council to be provided shall be completed prior to the completion of the proposed development.



8. Prioritisation of cycling

The stated objective of Wexford County Council is to encourage more walking and cycling throughout the town, and – in this case – to the proposed development. At present the national guidance – promoted by Wexford County Council on its vehicle fleet – of allowing a minimum distance of 1.5m when overtaking a cyclist, is not allowed for in the proposed plans or on any of the approach roads to the proposed development. In addition, the nearest current cycling path ends 850 meters from the site ('Traffic and Transportation Report', as submitted by Wexford County Council) – and is part of a now overdue cycling path construction from Wexford County Council.

It is our submission that the Council's own overdue Wexford Town and Environs Development Plan 2009-2015 project be completed before any work on the proposed site commences, and that cycle lanes be included in the traffic plan for Trinity Street and all approaches to Trinity Street (i.e. Lower and Upper William Street, Parnell Street, Fishers' Row).

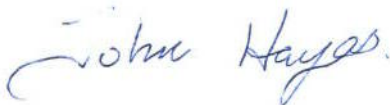
9. Invasive Species

As per Wexford County Council's submission the proposed site has been invaded by Japanese knotweed *Fallopia japonica* (Chapter 7, Biodiversity). In the Council's own decision on planning register no. 20190025 (O'Leary International Unlimited for a site on Whiterock South), planning has been refused, having regard to Regulations 49 and 50 of the European (Birds and Natural Habitats) Regulations 2011 which make it an offence to plant, disperse, allow dispersal or cause the spread of Japanese knotweed. In the above-mentioned case, a five-year programme for the control and monitoring of Japanese knotweed on site is deemed as being necessary.

It is our submission that the invasion of Japanese knotweed on the proposed site should fall under the same restrictions and treatment regime that Wexford County Council imposes on other sites and would ask for a detailed reasoning if this is not the case.

In conclusion, as local residents we welcome any appropriate development of the existing site. However, the existing proposals do not represent an appropriate or sustainable development, with particular relevance to safety, amenity provision, respecting existing streetscapes and maintainable growth. We therefore submit that the proposed development should be refused planning permission and a proper and meaningful consultation process take place with existing residents over the above concerns and before the submission of any future plans.

Yours Sincerely



John Hayes

AN BORD PLEANÁLA	
01 APR 2019	
LTR DATED _____	FROM _____
LDG- _____	6
ABP- _____	

NAME (PRINT)	SIGNATURE
JOHN HAYES	John Hayes.
ANNEMALIS O'CONNOR	Anne Marie O'Connor
MARLOWE MARY	Mary Marlowe
RUTH ALLEN	Ruth Allen
PAULINE KELLY	P.A. Kelly
STEPHAN SHAWMARTIN	Stephan Shawmartin
WALTER KELLY	Walter Kelly
NOEL CARROLL	Noel Carroll
MARY FORDE	Mary Forde
SHARON MURPHY	Sharon Murphy
RAY MURPHY	Ray Murphy
JENNIFER BROPHY	J. Brophy
MARK BROPHY	Mark Brophy
Niamh DORAN	Billy Niamh Doran
BILLY DORAN	Billy Doran

AN BORD PLEANÁLA

01 APR 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

NAME (PRINT)	SIGNATURE
J. CROSSIE	John Crossie
B. CROSSIE	Brendan Crossie
Michael Murphy	Michael Murphy
CARMEL MURPHY	Carmel Murphy
A. Scahill	A. Hill
MIKAYIA SCAHILL	M. Scahill
KAROL JACKSON	Karol Jackson
Cathal O'Shea	Cathal O'Shea

AN BORD PLEANÁLA

01 APR 2019

LTR DATED _____ FRG. _____

LDG- _____

ABP- _____

NAME (PRINT)	SIGNATURE
ANN KEELING	Ann Keeling
PETER ROCHE	Peter Roche
BETTY ROCHE	Elizabeth Roche
JOE KEELING	Joe Keeling
JOANNE KEELING	Joanne Keeling
JESSIE STAFFORD	Jessie Stafford
BEVERLY NOLAN	Beverly Nolan
S.A. COWAN	S.A. Cowan
COLIN NOLAN	Colin Nolan
NICKY KEELING	Nicky Keeling
MICHAEL STAFFORD	Michael Stafford
JOLEEN COWAN	Joleen Cowan
JOHN HARPER	John Harper
JOHN MARTIN DOOLE	John Martin Doole
Helen Murphy	HELEN AN MURPHY

01 APR 2019
 LTR DATED _____ FROM _____
 LDG- _____
 APP. _____

AN BORD PLEANÁLA

01 APR 2019

SIGNATURE

NAME (PRINT)	SIGNATURE
HELEN MURPHY	<i>Helen Murphy</i>
MARIA RUTTLEDGE	<i>Maria Rutledge</i>
MARY O'DONOVAN	<i>Mary O'Donovan</i>
NOISE BYRNE	<i>Noise Byrne</i>
CHRIS HAYES	<i>Chris Hayes</i>
EUGENE MOYNIHAN	<i>Eugene Moynihan</i>
GILLIAN KINSELLA	<i>Gillian Kinsella (8 Trinity Street)</i>
PAMELA SCALLAN	<i>Pd Scallan</i>
CAMILLA GULLIVER	<i>Camilla Gulliver</i>
STEPHANIE HAYES	<i>Stephanie Hayes</i>
BARRY KINSELL	<i>Barry Kinsella</i>
KEVIN MURPHY	<i>Kevin Murphy</i>
IAN ROCHE	<i>Ian Roche</i>
KATHLEEN ROCHE	<i>Kathleen Roche</i>
EDDIE ROCKE	<i>Ed Roche</i>

EMER DONNELLY
 PAUL MOORE
 John Henneberry
 LISA HENNEBERRY
 GARETH YOUNG

Emer Donnelly
~~*Paul Moore*~~
 JOHN HENNEBERRY
 Lisa Henneberry.
Gareth Young

Name (Print)

Signature

~~Patsy~~ ~~Farrell~~
Patsy FARRELL

~~Patsy~~ ~~Farrell~~
Patsy Farrell

SORCHA TRAYNOR

Sorcha Traynor

AOIFE TRAYNOR

A. Traynor

JIM O'LEARY

Jim O'Leary

MARGARET O'HEARY

Margaret O'Leary

BRIAN O'LEARY

Brian O'Leary

KATHRYN TRAYNOR

Kathryn Traynor

Fran Traynor

F. Traynor

DONAL O'LEARY

Donal O'Leary

Treasa Traynor

Treasa Traynor

CIARÁN DEMPSEY

C.D.

Paddy Byrne

Agnes Byrne

Pun Byrne

AN BORD PLEANÁLA

01 APR 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

NAME (PRINT)	SIGNATURE
ROSALEEN QUINLISK 3 Emmet Place. Trinity SE Wexford.	Rosaleen - Quinlisk
ANNE O REILLY	Ann O Reilly
PATRICK ROCHFORD	P. Rochford
NOEL HAYES	Noel Hayes
FINTAN FARRELL	Fintan Farrell
ANNE MURPHY	Anne Murphy
MAUREEN NOLAN	Maureen Nolan
MARY THOMAS	Mary Thomas
MARY KINSELLA.	Mary Kinsella

AN BORD PLEANÁLA

01 APR 2019

LTR DATED _____ FROM _____

LDG. _____

ABP. _____

NAME (PRINT)	SIGNATURE
THOMAS MIAHONEY	T. Miahoney
NED WHEELER	Ned Wheeler
BRIAN ROGAN	Brian Rogan

AN BORD PLEANALA

01 APR 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____