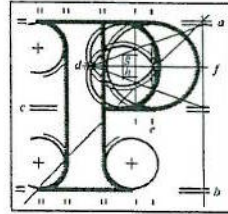


Our Ref: ABP-303726-19



An
Bord
Pleanála

Katja Hayes
1 Seaview Avenue
Trinity Street
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 Madam

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

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

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

Katja Hayes
1 Seaview Avenue
Wexford, Co. Wexford

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

AN BORD PLEANÁLA
LDG- 014665-19
ABP- _____
01 APR 2019
Fee: € 50 Type: card
Time: 11:14 By: hand

28th of March, 2019

Dear Sir/Madam,

I wish to submit my observations to An Bord Pleanála on the proposal by Wexford County Council to construct a mixed-use development at **Trinity Wharf, Trinity Street, Wexford, Co. Wexford – An Bord Pleanála Ref PL303726.**

This submission is made by **Katja Hayes, 1 Seaview Avenue, Wexford, Co. Wexford** – a resident in the immediate vicinity of the proposed development.

The observations of this submission relate specifically to

1. the location and deficiencies/safety issues of the proposed junction for vehicular access to the proposed development
2. the visual impact of the proposed development on the surrounding area
3. the unsustainability and provision of parking of the proposed the development
4. the infrastructure provided for cyclists
5. the construction of the new development

This submission will conclude with my final thoughts about the proposed development as a resident and my conclusion.

1. Proposed Junction for Access to New Development with Trinity Street and Seaview Avenue

Firstly, I wish to point out that the proposed traffic and parking management and its impact on the existing vicinity and residents has not been addressed at the public meeting held on 5th of September 2018 in the Talbot Hotel. Plans and maps displayed at this meeting (see Trinity Wharf Wexford – Masterplan; available on the Wexford County Council website (<https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity-Wharf-Merged-document-for-link.pdf>)) did not cover the impacts of the proposed development on Trinity Street and Seaview Avenue (e.g. new road layout, location of the new junction and removal of on-street parking on Trinity Street). When queried by existing residents, Wexford County Council representatives stated that this topic was not the purpose of this meeting. Wexford County Council further failed to correctly understand these observations/queries submitted within the subsequent submission process (available online and via post until 16th of September 2018) but instead interpreted that these observations relate to the new development on Trinity Wharf.

The plan proposes a new junction to be created for vehicular and pedestrian access to Trinity Wharf from Trinity Street, including Seaview Avenue as the fourth road leading into this proposed new junction. The construction of the new junction at the proposed location will have negative impacts with regards to the following areas:

A) Parking for Existing Residents

In order to accommodate the proposed layout of the junction (i.e. introducing feeding lanes on Trinity Street in both directions), 18 existing parking spaces along Trinity Street (16 spaces) and Seaview Avenue (2 spaces) will have to be permanently removed – these spaces are currently used by existing residents, customers and employees of 3 businesses within this area, and daily visitors/tourists. This will leave the residents of the block comprising of Seaview Avenue, Trinity Street and Trinity Place – a total of 26 residential properties (including some apartments) – with approximately 10 to 13 car parking spaces (depending on the sizes of vehicles). This is a shortfall of at least 50% of parking required when allowing for 1 car per property, as is allowed by Wexford County Council for each residential apartment in the proposed development.

Parking in this area has been proven challenging already over the last few years with all available parking spaces on both sides of Trinity Street being fully occupied by vehicles during day and evening times. The proposed “Pay and Display” parking does not constitute a guarantee for parking spaces for residents and “pay” alone will not necessarily discourage visitors to the town and new development from parking in this area, considering that either the hourly rates for parking at convenient places in town are higher or car parks with a similar rate are fully occupied. Also, “Pay and Display” will stop at 18:30, providing free on-street parking for visitors from this time onwards – a time when residents return home from work or other activities. Furthermore, for “Pay and Display” to be effective, regular parking monitoring needs to be enforced. Since its introduction in the area of Trinity Street (in mid-March 2019) there has been no monitoring conducted as evidenced by car dealers from outside the area parking cars for sale on the street from approx. 09:00 to 17:00. In addition, the proposed development contains the construction of a car park with a capacity deliberately set lower than required by demand, forcing employees/workers in and visitors of the new development to find parking in the surrounding area (as per report “within in a 10-minute walk of the development” (see Chapter 5: Traffic Analysis, pp 21)), with Trinity Street being the nearest and most obvious location (for further observations on this matter please see point 3.).

As a consequence, I am asking that permission for the re-designing of Trinity Street involving the removal of existing parking spaces as proposed will be refused.

B) Seaview Avenue

In accordance with road safety regulations, the proposed plan involves a re-design of Seaview Avenue so that no vehicle will have to reverse out from Seaview Avenue onto the new junction or into Seaview Avenue. This re-design includes the introduction of

- a turning head (3.3 by 4.005 meters) in an existing green area
- an exit lane from Seaview Avenue with a traffic light in operation

The proposed turning head will be not sufficient in size to allow any vehicle bigger than a passenger vehicle (e.g. oil delivery lorry, refuse truck, mini-buses picking up and dropping off elderly residents)



to turn around in Seaview Avenue. Consequently, this would either cut off Seaview Avenue from essential services required or result in road safety issues, as vehicles like those mentioned above will either have to reverse into or out of Seaview Avenue. Even a bigger turning head would not solve the issue because of limitations imposed by the width of Seaview Avenue itself.

The new exit lane from Seaview Avenue involves the removal of two parking spaces that have been used as such over several decades by residents of Seaview Avenue. There has been no consultation with the residents with regards to the usage of this "static" space which is located on the footprints of a demolished house and has never been part of moving traffic or used as a traffic lane.

In addition, the plans do not show a footpath between 1 Seaview Avenue and Trinity Street. Currently, the footpath from Seaview Avenue stops at 1 Seaview Avenue with pedestrians using the current static space to walk in from or out to Trinity Street. With the new layout, pedestrians including children will have to use a lane designed for moving traffic in order to pass through this area, which creates a safety hazard.

Furthermore, the direction of the new lane (approx. 16m in length) is directly in line with the positioning of a bedroom window and the front-door of 1 Seaview Avenue which will have a negative impact in terms of

- emission from vehicles waiting at the traffic light in Seaview Avenue being directed into the house of 1 Seaview Avenue
- the traffic light itself causing light pollution for the residents of 1 Seaview Avenue as it will shine directly into a bedroom
- residents from 1 Seaview Avenue leaving the property walk out directly onto a traffic lane

Also, the location of the new exit lane in Seaview Avenue does not allow for a safe exit from Seaview Avenue. Due to the gable-end of a 2-storey dwelling as the left-hand side border of this exit lane, a blind spot exists with absolutely no visibility from the lane out onto the adjacent footpath on the left of the lane and vice versa, until the front of the vehicle has entered the footpath. This creates a safety hazard both for pedestrians coming from town on this side of the road and drivers of vehicles leaving Seaview Avenue, as there will be not enough space for either to react (stop) on time to avoid impact. This makes leaving Seaview Avenue in a vehicle totally reliant on the discipline of pedestrians, which cannot be guaranteed.

Consequently, I am asking that the plans for re-designing Seaview Avenue as proposed will be refused permission until road and environmental safety for pedestrians, vehicular users and residents can be fully guaranteed, and alternative parking solutions for residents are created.

C) Traffic along Trinity Street and William Street

First of all, I wish to advise that the numbers provided in the Traffic and Transportation Report with regards to the existing traffic volume along William Street and Trinity Street are to be viewed with care, as the volume was measured during 7 days that contained the August Bank Holiday Weekend in 2018 (see Chapter 5: Traffic Analysis, p 11) – i.e. a period with generally less traffic present at this end of town, as there is no school traffic from the adjacent primary school (St. John of God School, The Faythe) and only limited commuter traffic due to summer holiday season and a bank holiday. It also includes the bank holiday in the 5-day average numbers which cannot be seen as representing reality. In fact, residents along William Street and Trinity Street and all adjacent side streets (Fisher's Row, Seaview Avenue, Trinity Place, Emmet Place and Parnell Street) are confronted with hours long

ANNUAL PLAN

01 APR 2019

LTR DATED

LDC

APP

traffic jams in front of their houses resulting in up to 20-minute commutes from e.g. Seaview Avenue to the junction at the Talbot Hotel (approx. 450m). Furthermore, the local Wexford shuttle bus had to change its route during August 2018, by-passing William Street and Trinity Street due to heavy congestion causing major delays and affecting their schedule.

The proposed plan considers the usage of traffic lights and feeding lanes at the proposed junction in order to regulate the flow in and out of the new development. This concept has proven to be problematic in Wexford town (i.e. the traffic light system and feeding lane on the North Quay at Wexford Bridge causes excessive tailbacks from the bridge along the Quay, Trinity Street and William Street (over 3 km) during daytime (from about 11:00 to 19:00)). The short feeding lane proposed on the northbound side of Trinity Street will hold approx. 3 normal sized vehicles without blocking the straight lane leading into town centre. During peak times (i.e. office hours and evening hours when cultural events are taken place), when multiple vehicles will turn into the new development at the same time, this will cause major tailbacks up William Street as vehicles will have to queue on the straight lane until the traffic light allows them to turn and spaces free up on the feeding lane – this is in addition to already heavy traffic from vehicles going into town.

Furthermore, at the southern end of this feeding lane, there is a bus stop for the local Wexford shuttle bus, which is a very important mean of transport for the population of this area (including many elderly people), and is mentioned by Wexford County Council as an important transport link for the area and the proposed development. There is a regular bus schedule with buses approaching this stop every 20 to 30 minutes and stopping for a few minutes allowing passengers to get off and on the bus. Currently, the bus has to stop on the main lane into town for picking up or dropping off passengers. As a consequence, there will be either

- more traffic jams along Trinity Street, Fisher's Row and William Street or
- the bus stop will either have to be moved – away from the residents depending on this service – or
- a dedicated bus stop bay will have to be constructed, removing even more of the existing parking spaces.

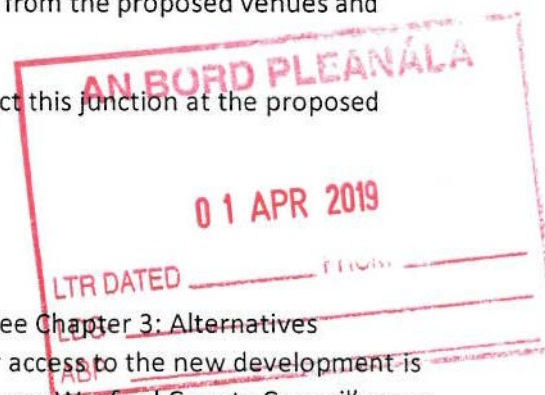
All of the above options remove important existing services from the existing community and bring no benefits.

Finally, the intended use of the new development – i.e. the intention to host cultural events and the operation of a hotel operating 24/7 – will extend the times of increased traffic on Trinity Street. This will be evident particularly at the proposed junction at night times and weekends, exposing residents on Trinity Street and Seaview Avenue to increased noise and air pollution levels from the higher volume of vehicle traffic – in addition to increased noise pollution from the proposed venues and attendees.

Based on these reasons, I am asking for the permission to construct this junction at the proposed location to be refused.

D) Access Road from the New Development

The planning application submitted by Wexford County Council (see Chapter 3: Alternatives Considered, pp 16) indicates that the least favourable location for access to the new development is the proposed junction with Trinity Street and Seaview Avenue. As per Wexford County Council's own admission, the junction is not ideal due to the longitudinal gradient of over 5% which is required to



allow for the construction of a level railway crossing. This gradient will have a negative impact in terms of

- safety for traffic and pedestrians – including young children living in this area and using this route to commute to and from the adjacent primary school
- increased air pollution due to vehicles waiting at the traffic lights coming from the new development having to start their vehicles on a hill

In addition, it has been acknowledged by an independent Auditor employed by Wexford County Council that the new access road will provide challenges with regards to its width at the junction end (Trinity Street) (see Traffic and Transportation Report, p 425) as it will compromise a safe entrance and exit for bigger vehicles (i.e. those vehicles may have to use parts of the footpaths in order to be able to manoeuvre around the corner when turning into the new development or onto Trinity Street southbound). I also question the suitability of this access road in case of emergency as this is not only the only access road to the new development but it is also not wide enough to allow for multiple bigger emergency vehicles entering and exiting the area, which is worsened by positioning of a sharp bend after the 5% gradient and railway crossing.

Also, the sharp bend in the access road right before the railway crossing when coming out of the new development will impact visibility for vehicle users onto the crossing and the road up to the traffic light, imposing a further negative impact on road safety.

However, Wexford County Council chose to progress with this solution as it

- does not require the purchase of 7m of land in order to use the existing entrance to Trinity Wharf (between Trinity Motors and McMahon's Building Supplies)
- more importantly (according to Wexford County Council), it provides a sea view for everybody accessing the new development

Choosing a nice view over safety is against common sense and does not reflect sustainable and modern town planning. I also question the reasoning behind this decision considering that the sea view which is currently appreciated by many existing residents is proposed to be taken away from them for the development. Also "view" in itself is not a valid reason for objecting to any planning application – how can it be a valid reason/suggestion to obtain planning permission?

I also question the reasoning behind building a completely new access road with above mentioned safety concerns and multiple negative impacts on the immediate surroundings, instead of utilising an existing access road that will eliminate and limit the disadvantages and negative implications mentioned above – which would be in the common interest of both existing community and Wexford County Council.

Consequently, I am asking for planning permission for the new access road to be refused.

2. Visual Impact

The proposed planning application contains the development of 1x 5-storey high residential block, 3x 5-storey high office blocks, a 6-storey high car park and a 6-storey high hotel. Based on the designs and as shown on pictures provided within the planning application, the height of these buildings and the materials used are out of place with the existing streetscape and out of character with the immediate vicinity, which contains predominantly 2-storey terraced houses with slate roofs



which have been in place since 1800s and show the history of a fishermen's area within Wexford town (the majority of houses have been built to accommodate fishermen and dockyard workers in this district). The new development copies large scale anonymous developments that can be found in any bigger city and would destroy the character of this area of Wexford - a seaside town built on a maritime heritage and one of the focal points of Ireland's Ancient East tourist trail.

Consequently, I am asking for the permission for 5- and 6-storey buildings to be refused.

3. Unsustainability and Parking within the New Development

The plans of the proposed development contain the construction of a multi-storey car park with a capacity of 509 parking spaces for residents, hotel guests and office employees. As per Wexford County Council's own admission, this is deliberately 110 spaces below the demanded capacity to encourage cycling and walking to and from work and to limit congestion in town centre (see Planning Statement Trinity Wharf Final1, pp 32). However, reality has proven to be different and while people are encouraged to become more active, 58% of employees questioned in a survey conducted by Wexford County Council use their car or van to commute to work (Chapter 5: Traffic Analysis, p 12). It is estimated that after completion of the development approx. 1200 employees will be working at the site – therefore according to Wexford County Council's figures and statements, approx. 700 vehicles (58% out of 1200 employees) will access the new development. This would indicate a shortfall of approx. 190 parking spaces for employees only, with no parking spaces left for the hotel, apartments, restaurant-retail-unit, day-events/conventions in the cultural centre or users of the marina.

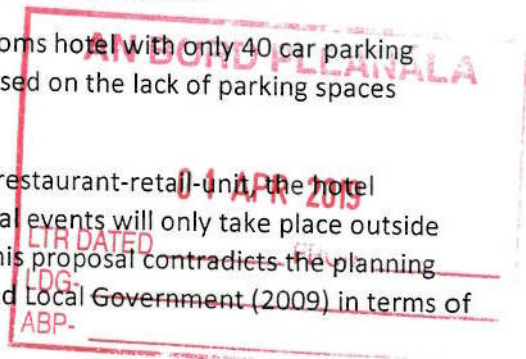
The plans also contain a "luxury" 120-bedroom hotel, 58 residential apartments, a cultural centre with 400 seats and a 2-storey restaurant-retail-unit. Wexford County Council intends to allocate 40 parking spaces to the hotel as it assumes that only 30% of the total bedroom capacity is required for parking spaces during office hours – after office hours, hotel guests and visitors to the cultural centre can use the parking spaces allocated for employees. As a consequence, this would assume that

- hotel guests only check-in from 6 pm and check-out before 9 am from Monday to Friday
- no functions or events such as weddings or cultural events are being held from Monday to Friday during office hours
- no over-time or week-end work is being required by the office tenants

If a private developer submits an application for a 120 bedrooms hotel with only 40 car parking spaces, it would be rightly refused by planning authorities based on the lack of parking spaces provided.

In addition, no parking has been specifically allocated to the restaurant-retail-unit, the hotel restaurant/bar and it is assumed that conferences and cultural events will only take place outside office-hours, which does not align with common practises. This proposal contradicts the planning guidelines from the Department of Environment, Heritage and Local Government (2009) in terms of promoting the efficient use of land.

Furthermore, the proposed design of the development will limit the potential use of the commercial premises as investors will be reluctant to occupy any premises if there is not sufficient parking guaranteed for employees and customers, potentially resulting in empty buildings left on site as evident in other parts of Wexford and the country.



Considering all these points mentioned above, the proposed capacity is not only 110 parking spaces below demand but more likely to be inadequate by over 300 spaces. According to Wexford County Council, some of the shortfall of parking spaces can be picked up by parking facilities provided in town centre as indicated by a parking survey that was conducted nearly 3 years ago and does no longer reflect current reality. The density and parking facilities of the proposed development will only further increase congestion in town centre – with congestion being an issue Wexford County Council intends to reduce – and generate unsustainable parking demand within the development and in all areas within a 10-minute walk.

Therefore, I am asking for planning permission to be refused until a more sustainable and efficient solution for the usage of the proposed development is being created and sufficient parking is provided to cater all buildings on a continuous basis.

4. Cycling Access to New Development

The planning statement includes the intention of Wexford County Council to encourage office workers to walk and cycle to and from work. However, the current cycling infrastructure does not allow for safe access to the new development with no cycling paths provided through town centre, along Trinity Street and William Street and any of the adjacent side streets – the closest cycling path to the site currently stops/starts 850 meters (see Chapter 5: Traffic Analysis, p 9) away from the site. The majority of these streets are very narrow making a safe over-taking of a cyclist with the recommended distance of 1.5 meters impossible.

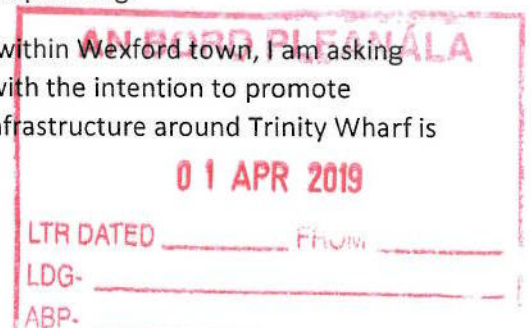
The proposed encouragement to cycle – partially resulting in planning a car park in the new development that cannot cater the minimum parking demands – is not reflected in the plans covering the areas outside Trinity Wharf. The lack of cycling lanes in the new road layout of Trinity Street and other surrounding areas and an increase in traffic volumes as predicted in the reports compromise safety for cyclists and other road users, limit the quality of service provided to cyclists and are not in line with the guidelines related to sustainable urban planning.

Considering the deficiencies in the current cycling infrastructure within Wexford town, I am asking that planning permission for any development on Trinity Wharf with the intention to promote cycling as a mean to commute to work will be refused until the infrastructure around Trinity Wharf is able to support this intention.

5. Construction Phase

The proposed plans suggest a construction phase of approx. 80 months – this seems excessive and asks a lot of the existing community. Also, the proposed plans do not provide sufficiently detailed information on the impacts of the construction phases on the existing community, such as in terms of

- traffic and parking management for residents and construction workers
- any types of pollution: noise, dust, air
- site management
- alternative work arrangements offered to office and home-office employees in the immediate vicinity during times of excessive noise and vibrations (e.g. during pile-driving),



power-outages or any other disruptions caused by the construction. A failure to meet this basic requirement could put the jobs of these workers in jeopardy.

The attempt by Wexford County Council to push responsibility to the construction company in charge of building the new development is not acceptable. A project within this scope requires a single point of contact from the developer in order to address and solve any potential issues, disputes or emergencies and this contact should be with the Wexford County Council, as they are the project sponsors.

I therefore ask for refusal of this application until a comprehensive plan including detailed information on site management and regarding above matters has been provided.

Final Thoughts and Conclusion

First of all, I would like to clarify that I am not objecting to progress and job creation or any development of the existing site. Any changes to Trinity Wharf are welcomed as long as they are sustainable and do not exclude the existing community (defined as a society of people having common rights and privileges or common interests).

However, as a resident of the immediate vicinity of Trinity Wharf, I feel that Wexford County Council has been neglecting the needs of the existing community by putting all its focus into meeting its own needs with the proposed development. The proposed plans make no provisions for the existing community – a “deprived area” – such as an area for recreational purposes or a playground accessible for everybody in this community. In contrast, this community is expected to support a project that

- introduces road safety hazards
- takes away existing parking
- exposes them to increased traffic volumes
- has major visual implications damaging the character and streetscape of this area
- increases air, light and noise pollution
- exposes them to approx. 80 months of heavy construction work

Concluding, I feel the proposed development is neither sustainable nor appropriate for the size and location of the site. This relates particularly to the importance of pedestrian and traffic safety, the visual impact on streetscape and character of this area, the impacts on the existing community and the infrastructure (including parking) provided for a successful, sustainable urban development.

Therefore, I am asking for planning permission for this proposed development to be refused.

Yours sincerely,

Katja Hayes

Katja Hayes

