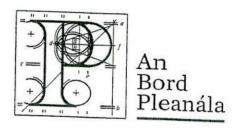
Our Ref: ABP-303726-19



Angelo Bonfirraro Landfall, Fishers Row Wexford Town 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.

Dear Sir/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

The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1

Submission on Planning application

Re: Planning reference: PL26 .303726

Applicant: Wexford County Council

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.

We wish to make the following observations on the above application:

1. The main and initial concern about this development relates to the scale, height and bulk of the development and the massive visual impact it will have on this neighbourhood and on the town in general. It will dwarf the other developments in this area, and completely destroy the visual skyline south from the quays, from the bridge and from Ferrybank. It is so out of character with the low level character of the south side of the town and outlying rural and coastal area as to cause a degradation of the view, atmosphere and ambience of this town, not to mention the neighbourhood.

We are not against some kind of appropriately scaled low level development on this site, but what is proposed is utterly inappropriate. Such a development would be better placed in a location with similar structures and purpose, e.g. Newtown near the County Coucnil's own offices and the Department of the Environment, or some of the business parks on the outskirts of the town. This site would be more appropriate perhaps for mixed housing development and some leisure facilities to avail of the marine nature of the river front.

Due to its Scale, height and bulk this development is not in accordance with the proper Planning and Development of the area.

2. Another concern about this development relates to climate change, rising sea levels and environmental implications of such an intensive over development of this seafront site. In recent years there has been an increasingly vocal and loud warning across the world regarding the depletion and melting of the ice caps, and the undoubted rise in sea levels that will affect all countries of this planet.

In view of what is now known and accepted as a fact, and something that is going to happen with increasing rapidity over the next number of years, how in all conscience can it be acceptable and appropriate to construct a development that will surely be heavily threatened by rising waters? Have we learned nothing from the recent years of flooding incidents of inappropriate construction on flood plains and riversides? And the ridiculous costs associated with recovery of damaged properties and putting in flood defences in places for sites that should never have been developed. Are we about to commit the same mistakes with the development of this site, despite all the knowledge and information we have regarding these issues?

There are plenty of locations in and around Wexford for office, hotel and apartment construction, that have none of the issues as described above. But this is not the right location at all. It is essential that the long term implications of this development are recognised, as well as the long term threats from a global crisis that is global-warming and increasing sea levels. It would be very remiss to ignore this in the context of reports from the IPCC and other international environmental organisations.

This proposal flies in the face of all the facts and experience we have at our disposal regarding climate change, rising sea levels, potential flooding and the necessity to waste yet more public funds on more flood defences.

Due to the long term risks associated with the rising water levels and the location on a high risk site, this development would not be in accordance with the proper planning and development of Wexford town.

3. This proposed development is a serious over development of a small site in an AR 2019 inappropriate location. This is a principally residential area of the town and to propose 2 six storey, 4 five storey buildings among the already established low-rise buildings at this seafront side of the town totally lacks sympathy or coherence of development in this neighbourhood. There is no regard given to the impact on the quality of life for the people who live in this location. The height and intensity of development in this proposal and it's overwhelming impact on a residential neighbourhood, is unacceptable on a human health and wellness perspective.

Due to the height and scale of proposal, the proposed development would not be in accordance with the proper planning and development of the area.

4. There is a total under provision of car-parking being provided on the site, with the proposed number of spaces seriously below the requirements of the local authority's own standards and policies. The area is already over-subscribed in terms of parking for residents and those who are already working and doing business in the town.

Providing less than 500 spaces for a potential 1,200 persons occupancy is completely unacceptable. The concept that walking and cycling would be encouraged by provision of paths etc. is to be commended, but the reality is in that the majority of people will continue use their cars and under-provision of spaces is not the solution to

reduce this dependency – it just pushes the demand out onto the already over used public roads. And under this proposal a third lane is being introduced, which will further reduce on street parking capacity in the area anyway.

In view of the lack of car parking capacity, and on traffic grounds, this proposal development would not be in accordance with the proper planning and development of the area.

5. There are regularly long delays in traffic flows in the area, which is already inadequate to cope with the current volumes of traffic coming into the town. There are currently two new developments in the area (apartments at Trinity Street and significant housing developments beyond Rocklands on the Wexford/Rosslare road) which will see substantial increases of traffic movement in and out of the area, when completed. It is unacceptable to propose such an intense development giving the obvious substantial increase in traffic movements that will result, to the detriment of this area.

In view of traffic reasons the proposed development would not be in accordance with the proper planning and development of the area.

6. We would have serious concerns about the environmental impact on the estuary, both during construction and thereafter. The impact on fishing and wildlife must be given priority in this time of destruction of bio-diversity in all regions.

Also the impact on tidal movements will create further silting problems in the harbour – there had been serious silting problems already caused by the extension of the quays. Again that work was carried out prior to the level of knowledge and understanding we now have of the long term impacts of such developments, and we should not just carry on developing regardless of the wealth of facts and knowledge now at our disposal. This work will only increase the problems and should not be granted permission.

In view of the negative impact on the environment in this area the proposed development would not be in accordance with the proper planning and development of the area,

7. From our research among local letting agents there is no demand in Wexford for office space – where will the businesses come from? Is the local authority in danger of wasting public funds in the hope that businesses will arrive en masse to occupy the offices? Are they creating a white elephant at great expense to the tax payers? We are not satisfied that there is a demand for such a large amount of office space in Wexford, without the probable closure and displacement of already occupied offices, leaving vacant and potentially derelict buildings in other parts of the town.

In view of the negative impact on existing business accommodation the proposed development is not in accordance with the proper planning and development of the area.

8. We would query the necessity for yet another new hotel in the town. A permission has been granted recently for a hotel development opposite the Wexford Bridge. The town would seem to be very well served in terms of hotels when that new one is completed. There would appear to be a threat to the viability and displacement of business of existing hotel and tourist accommodation in Wexford by the building of yet another hotel.

For this reason the proposed development would not be in accordance with the proper planning and development of the area.

9. The proposal is architecturally completely out of character and is in no way cognizant of the culture and heritage of this area. When viewed from the surrounding streets (in the drawings and montages provided), the development appears overpowering, and totally suffocates the maritime ambience of the south side of the town.

In view of the lack of sympathy to the maritime nature of the site and surrounding area the proposed development is not in accordance with the proper planning and development of the area.

10. The proposed development includes cafe and retail business. This aspect of the development would have a negative impact on the unique vibrancy and old town ambience of the Main Street, the spine of commercial activity in the town. This gives the town its own unique attraction for retail and eateries. Once again this development is likely to cause displacement of other already existing businesses.

In view of the negative impact on the viability of the Main Street businesses (retail, restaurants and cafes), the proposed development would not be in accordance with the proper planning and development of the area.

We would urge An Bord Pleanala to give serious consideration to this submission and to give weight to the issues raised above, most particularly regarding the issues of the size, scale and bulk of the proposal and the intensity of development on this relatively small site in a sensitive coastal area, which will be so damaging to the character of the low lying nature of this area and to refuse permission for this development for these reasons.

Regards,

Date:	2/-	03-2	019

Angelo Bonfirraro

Katia Panepinto ("Landfall" Fishers Row, of Wexford Town)

Anne O'Reilly (26 Fishers Row, of Wexford Town)

2 9 MAR 2019

AN BORD PLEANALA

LTR DATED _______

