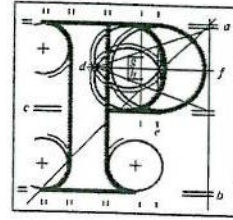


Our Ref: ABP-303726-19



An  
Bord  
Pleanála

Bórd Iascaigh Mhara  
PO Box 12,  
Crofton Road  
Dun Laoghaire  
Co. Dublin

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 / Madam

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this 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](http://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

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64 Marlborough Street  
Dublín 1  
D01 V902

An Bord Plenála  
64 Marlborough Street  
Dublin 1  
D01 V902

29<sup>th</sup> March 2019



To Whom it Concerns

**Re: Invitation of Submission or Observation on Application by Wexford County Council to An Bord Plenála for Approval of Proposed Development at Trinity Wharf, Trinity Street, Wexford.**

Thank you for your invitation to provide submissions or observations on the proposed Trinity Wharf Development. BIM, Ireland's Seafood development Agency wish to use this opportunity to ensure that the current and future needs and concerns of the seafood sector are appropriately considered within An Bord Plenála's assessment of and decision on the application.

Mussel culture is an important economic activity within Wexford Harbour. The licensed operators are part of the Irish Bottom Grown Mussel Marine Stewardship Council (MSC) Certification and some operators also hold organic certification for their mussels. These accreditations demonstrate a responsible approach to sustainable production practices and environmental stewardship by the sector.

We acknowledge that consideration has been given to the issues that we asked to be covered in our response to the earlier scoping consultation. These relate to surface water run off pre and post development, sewage pre and post development, risk of discharge of hazardous materials during construction and alterations to the hydrodynamic regime in the main channel and outer harbour.

Should the development proceed, we are satisfied with the proposal to pump sewage from the development to the main collection scheme for treatment at the Waste Water Treatment Plant for the town. We request that the design ensures that no stormwater is mixed with foul sewage at the development site and that no overflow of any sewage is allowed at the development due to the proximity of licensed aquaculture and the Sea Fisheries Protection Authority's designated shellfish sampling point for microbiological classification. The main mussel production area is currently classified as B and it is vital that this is maintained or improved to ensure that shellfish from the area are safe to eat and require no additional treatment than that which is currently required prior to consumption. This is important for the sustainability of the seafood businesses in the bay.

We are happy with the SuDS design for 1 in 100 year rainfall event and a petrol/hydrocarbon interceptor for treating surface water.

We are also happy that a project-specific Construction Environmental Management Plan and Environmental Operating Plan will be prepared for the development to cover all potentially polluting activities and include an emergency response procedure.



We note the elevated levels in some of the sediment samples at proposed dredging sites for the marina and are satisfied that a decision has been taken not to dispose of dredge spoil at sea. Furthermore, it is crucial to take preventative measures to curtail spread of particulates to current mussel beds, during any dredging/silt disturbing operations. We recommend that the developers liaise directly with the licensed mussel operators to determine the best time of the year to undertake dredging/silt disturbing operations in order to minimise any impact to current stocks.

We note that sewage pump-out facilities will be available to all leisure boats using the marina. We suggest that the importance of using these facilities should be reinforced to marina users due to the close proximity of licensed aquaculture sites for mussels. These are classified under a system based on e-coli levels in shellfish and undergo regular testing. We would like to seek clarification on the management system for this sewage and request that it is appropriately treated prior to discharge.

We are currently working with Aquaculture operators in Wexford harbour to conduct risk assessments and develop biosecurity measures in relation to invasive alien species. The proposed marina facilities will contribute to an increased risk of Invasive Alien Species introductions to the area. We therefore request that marine alien species are also considered in the Invasive Species Management Plan and that appropriate actions are taken to minimise risks associated with vessel movements, hull fouling and maintenance of marine infrastructure.

We are satisfied that the marina design option chosen will have the least impact on the hydrology of the harbour and sedimentation of the main channel in and out of the harbour.

We hope that you will take the time to consider these observations and that they are helpful to your consideration of the proposal. Please do not hesitate to contact us should you require clarification on any of the issues raised.

Yours Sincerely



Brian O'Loan  
Regional Aquaculture Development Officer



Gráinne Devine  
Environmental Officer

