

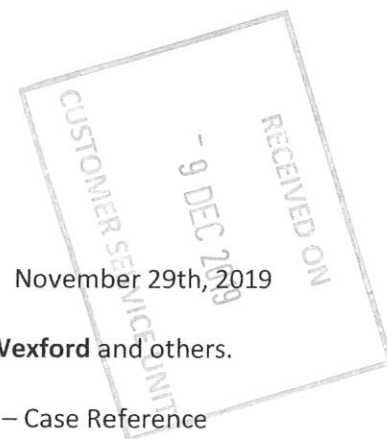
An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

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November 29th, 2019

Subject: Follow-on submission by **John Hayes, 1 Seaview Avenue, Wexford, Co. Wexford** and others.

Re: Proposed development at Trinity Wharf, Trinity Street, Wexford, Co. Wexford – Case Reference PL26.303726

Dear Sir/ Madam,

We wish to submit our further observations on the revised proposed development at Trinity Wharf, Trinity Street, Wexford, Co. Wexford – Case Reference PL26 .303726, relating to the implications of the proposed development. In advance, we would like to make it clear that the majority of residents that we have spoken to in the local area agree that development on the site is desirable and could 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

With those caveats in mind here are the observations as agreed by the signees:

1. Unsustainable/Overdeveloped nature of the proposed development

Applicant response:

“The figure of 1,200 as quoted in the submission is a figure that was used as a target figure at the commencement of the project, but as the design developed and the limitations in terms of parking spaces was identified a lower number of office jobs was set (approximately 830 employees in total). The parking demand generated by the proposed office employees is 521. Employees will be encouraged through the implementation of a Transportation Mobility Management Plan to use other forms of transport rather than driving, to ease pressure on traffic and parking within the town centre. A supplementary car park survey was undertaken in September 2019 to account for school term traffic. An analysis of the supplementary car park survey indicates that there is adequate capacity in alternative off-street car parks to absorb the site deficit without causing a significant disruption to the Town Centre as outlined in the Traffic Addendum. The results of the supplementary car park survey are presented in the Traffic Addendum in Appendix B1.”¹

It is difficult to take seriously the assertion that the figure of 1,200 employees was used by Wexford County Council only at the commencement of the project, when it was a figure that was quoted at the public consultation meeting and was repeated at multiple events afterwards:

- The main internet page from Wexford County Council² quotes a figure of “1,600 people to live and work in a town centre area”. Given that the proposed development includes

¹ 11.2 Further Information Request Page – Wexford County Council Response, page 51

² Available at <https://www.wexfordcoco.ie/business/economic-development-projects/trinity-wharf-development>, viewed on November 16th 2019

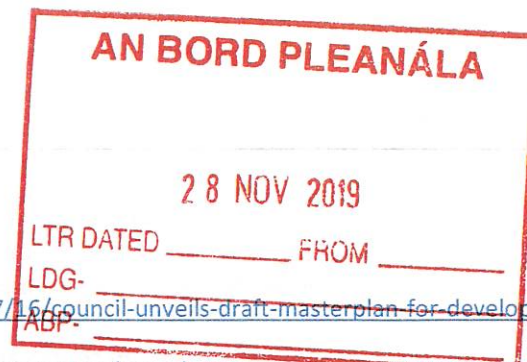
8 one bed-room apartments and 50 two-bed room apartments it would seem reasonable to state that 216 people can live on the proposed site (4 per two-bedroom apartment and 2 per one-bedroom), which leaves a figure of 1,384 people working on the site.

- The Wexford County Council launch plan states that they estimate that “Trinity Wharf has the capacity to create over 1,000 jobs”³.
- In an interview with the Gorey Guardian a figure of “at least 1,00 new jobs” is quoted⁴
- Wexford People Paper states that “Wexford County Council [...] estimates that Trinity Wharf has the potential to provide over 1,000 jobs in the technology and financial services”⁵.

Given that observations can only be made on the basis of what is submitted, it would seem that the least that Wexford County Council could do is to submit accurate, consistent figures. If this basic request cannot be met then the project should be rejected.

As per Wexford County Council’s newly revised figures the site will host 830 office jobs when complete, with a parking demand of 521 places. As per the council’s own provided figures in Appendix B1⁶, this will result in a shortfall of 130 spaces on site. On first viewing it is clear that this is almost equal to the total maximum number of spaces identified in the Council’s own survey of all available spaces within a ten-minute walk (156 spaces - Appendix B1⁷). As the figure of 156 spaces also includes the 21 spaces that will be removed in the Paul Quay car park if the proposed development proceeds, the actual theoretical number of available spaces within a ten-minute walk is 135 – i.e. there is no extra capacity if more people drive to work (e.g. on a rainy day), if more than the proposed 830 people are employed on the site (and as the site has not been redesigned to take into account a lower number of employees this is a distinct possibility) etc.

However, on further examining the parking figures provided it appears that Wexford County Council has inexplicably included the Crescent Quay Off Street Car Park North⁸, with a capacity of 61 car park spaces. In the initial application this was correctly identified as being unsuitable for workers on the proposed site as there is a parking restriction of 4 hours in place (Image 1).



³ Available at <https://www.wexfordcoco.ie/news/2018/07/16/council-unveils-draft-masterplan-for-development-of-trinity-wharf>, viewed on November 21st 2019

⁴ Available at <https://www.independent.ie/regionals/goreyguardian/news/raising-the-bar-at-trinity-wharf-34414659.html>, viewed on Nov 21st, 2019

⁵ Available at <https://www.wexfordpeople.ie/news/2-million-grant-for-trinity-wharf-37568102.html>, viewed on Nov 21st, 2019

⁶ 11.2 Further Information Request Page – Wexford County Council Response, page 124

⁷ 11.2 Further Information Request Page – Wexford County Council Response, page 124

⁸ 11.2 Further Information Request Page – Wexford County Council Response, pages 123-124

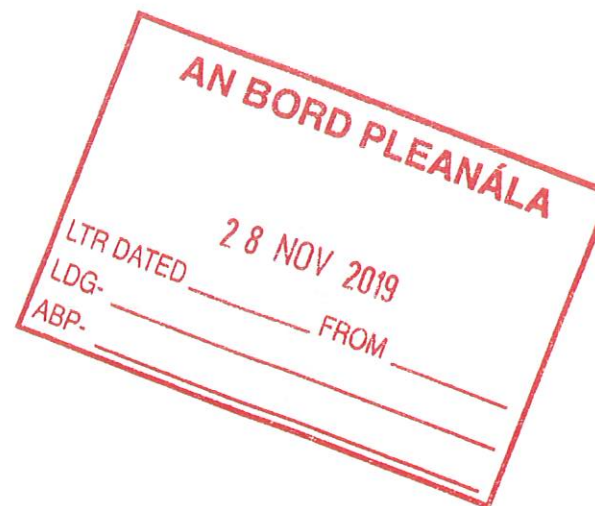
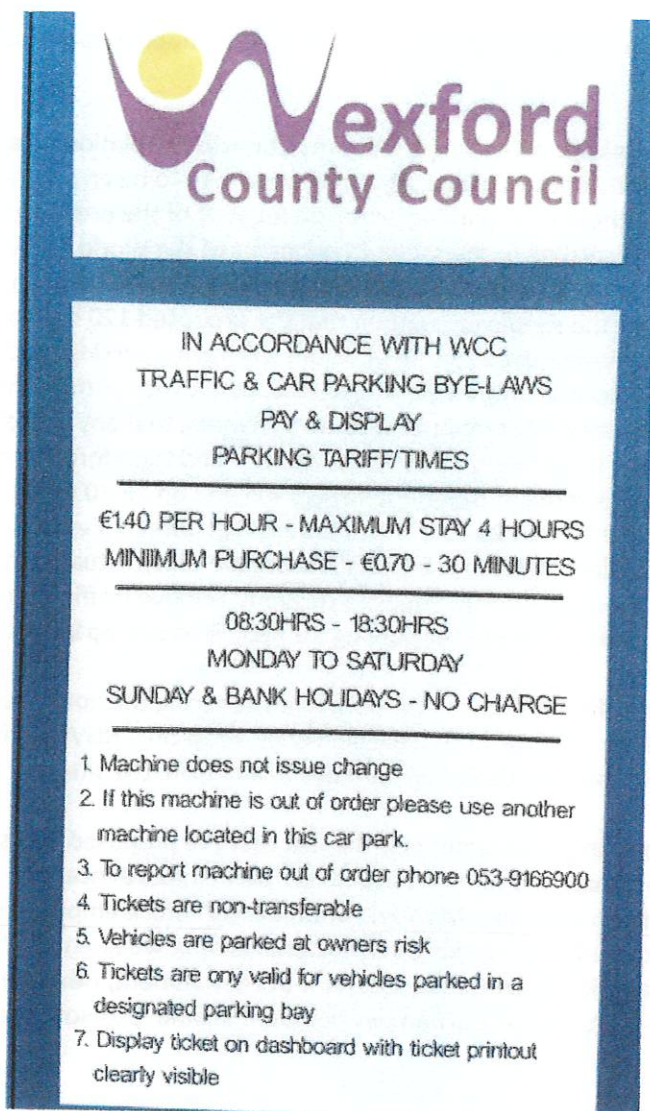


Image 1 Parking signage at Crescent Quay Off Street Car Park North, November 2019

This further reduces the theoretical available number of spaces within a ten-minute walk to 74 – significantly less than the number of spaces needed to support the office jobs only. Additionally, that number of 74 has been reduced further by the removal of on street long term parking at Paul Quay⁹ in November 2019 - removing approximately 13¹⁰ actual parking spaces that will have to be accommodated in the existing capacity and therefore reducing the theoretical figure

⁹ Shown in Appendix AA4, 11.2 Further Information Request Page – Wexford County Council Response, page 249

¹⁰ Chapter 5, Traffic Analysis, pg 22; available at

[https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity Wharf ABP/4.2%20Main%20Text/Chapter%205%20Traffic%20Analysis.pdf](https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity%20Wharf%20ABP/4.2%20Main%20Text/Chapter%205%20Traffic%20Analysis.pdf); viewed November 26th, 2019

to just over 60 spaces (i.e. less than half of the required spaces to accommodate parking for office workers).

As the figure of 830 office jobs correlates with Wexford County Councils calculation on available office floor space (see point 10 – Efficient use of space), and is presumed to be an accurate and final figure it should be noted that there is no parking provision for staff of the proposed hotel, convention centre or shop/ café. According to the recommendations of the World Tourist Organization, “the optimum number of staff per 10 rooms in three star hotel – 8 person, in four star hotel – 12 person”¹¹, leading to the simple calculation that the proposed 120 bed four star hotel would have approximately 144 employees, none of whom will have a parking space within at least a ten minute walk of their place of employment. Similarly, employees of the convention centre and café will have to park at least a ten-minute walk away, hoping that any available spaces in that area have not already been taken by other co-workers and therefore forcing them to park even further away. In practise most of these employees will end up 15-20 minutes away as the closest car park outside of the 10-minute catchment area is High Street/ Keyser’s lane car park, which only has 42 spaces¹². In fact, most of the excess spaces are either situated in the town centre, which is counter to Wexford County Council’s desire to remove traffic from the town centre and would have the effect of removing parking for people who shop in that area.

Moreover, 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), 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 830 office 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’.

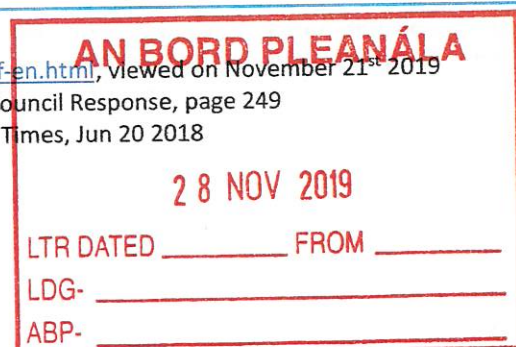
Wexford County Council’s own submission that parking for guests staying in the 120 rooms in the hotel will only be needed outside of business hours clash with the reality that hotels in Ireland are currently working at over 90% capacity¹³. The Council’s statement that conventions are mainly held at week-ends 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.

¹¹ Available at <https://www.city-of-hotels.com/165/hotel-staff-en.html>, viewed on November 21st 2019

¹² 11.2 Further Information Request Page – Wexford County Council Response, page 249

¹³ ‘Boom time at Irish hotels as occupancy exceeds 90%’, Irish Times, Jun 20 2018



As the Wexford County Council's figures for parking demand have changed with each submission – in line with the changing number of office workers – a more accurate gauge of the parking requirements may be established from first principles i.e. working out the volume of spaces required based on the size of the proposed development. Fortunately, Wexford County Council has provided a basis for such calculation in the “Wexford Town & Environs Development Plan 2009-2015”, chapters 10-11¹⁴. The calculation provided in this plan are assumed to be current as “The Plan will continue to have effect until 2019, or such time as a new County Development Plan is made.”¹⁵ On page 116 the car parking standards are specified as shown in Image

Table 4: Car Parking Standards

Residential	Car Parking Requirements
Houses	2 per House
Apartment/Flat	1.5 per apartment/flat
Guest House/B&B	1 space per bedroom
Hotel	1 spaces per bedroom
Hostel	1 space per bedroom or 1 space per 10 bed dormitory
Caravan/Camping Site	1 space per pitch
Commercial	Car Parking Requirements
Shopping: Retail Floorspace	1 space per 20 sq. m.
Offices: Gross Floorspace	1 space per 25 sq. m.
Public Houses / Restaurants	1 space per 25 sq. m.
Hot Food Take Aways	Minimum of 5 spaces per unit or 1 space per 10 sq. m.
Dance Halls Public Area	1 space per 25 sq. m.
Cinemas, Theatres, Stadia	1 space per 10 seats
Conference Centres: Public Areas	1 space per 25 sq. m.

Image 2 Car parking specifications for developments in Wexford Town and Environs

Using the above specifications – which would be applied to any other development in Wexford Town and environs – the calculations for parking spaces are show in Image 3 and result in a total parking

¹⁴ Available at <https://www.wexfordcoco.ie/sites/default/files/content/Planning/WexfordTownPlan09-14/WexTown%26EnvsDevPlan2009Ch10-11.pdf>, viewed on November 27th, 2019.

¹⁵ <https://www.wexfordcoco.ie/planning/development-plans-and-local-area-plans/current-plans/wexford-town-and-environs-development>, viewed on November 27th, 2019

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requirement of 1115 spaces. Given that the parking capacity of the site is just over 500 spaces this leads to a shortfall of just over 600 spaces.

Building	Allocation as per Wexford Co. Council guidelines	Total number of spaces required
120 bedroom hotel	1 Space per bedroom	120
58 apartments	1.5 spaces per apartment	87
Combined office space of 16,635 sq. m	1 space per 25 sq. m	665.4
Cultural Centre of 2945 sq. m	1 space per 25 sq. m	117.8
Restaurant/ Dining of 1530 sq. m	2 space per 25 sq. m	61.2
64 Berth Marina	consider that 1 space per berth as a min.	64
		1115.4

Image 3 Total parking requirements based on Wexford County Council Town and Environs Plan 2009-2015

It is our submission that whatever set of figures are used – i.e. using either the changing number of office workers (which excludes all other users of the proposed site) or using the parking requirements set out by Wexford County Council themselves – the only conclusion that can be reached is that there is a significant shortfall of parking allocation on the site as currently designed and that this will lead to severe on-street parking issues both in the immediate vicinity and across the entire town. Therefore we would urge An Bord Pleanála to reject the development in its current format.

2. Traffic - Suitability and Safety of Proposed Junction

Applicant response:

“There were several deciding factors in proceeding with Alignment Option 3 as the preferred option as discussed in section 3.7.6.2 Main Access Road of the EIAR. There were no major environmental or road safety differences between the 3 options.”¹⁶

“The statement cited from Chapter 3 Alternatives Considered in full is ‘an entrance off Trinity Street at the gap site owned by Wexford County Council 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’. The referred gap site is the site south of McMahons and not at the location of the existing laneway. The location of the proposed access street does not increase dangers to children and people crossing Seaview Avenue.”¹⁷

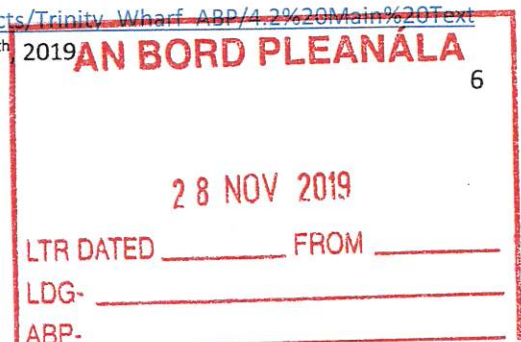
The text that was actually referred to in the original submission is “Alignment Option 1 considered widening the existing access lane between McMahan’s Home and Garden and Trinity Land Rover, to accommodate the proposed access road. The benefit of this option arises from the level difference between the site and Trinity Street being the most advantageous of the three options. This option was not considered feasible as an additional 7m strip of land minimum would have to be purchased on one or both sides of the existing access lane.”¹⁸

¹⁶ 11.2 Further Information Request Page – Wexford County Council Response, page 51

¹⁷ 11.2 Further Information Request Page – Wexford County Council Response, page 51

¹⁸ Page 19, Alternatives Considered, available at

https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity_Wharf_ABP/4.2%20Main%20Text/Chapter%203%20Alternatives%20Considered.pdf, viewed on Nov 16th 2019



Based on this text:

- a. As use of the original junction would remove the need for the radical resign of the current street layout (with consequent negative effects on long established local businesses, decrease in traffic safety and loss of on-street parking), and would appear to be the most economic option this would seem to 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 (7 square meters), we would question why this option has not been pursued (as per Wexford County Council's response).
- b. As residents we would submit that the original, existing entrance represents the safest route to the site as the proposed redevelopment of the entrance to Seaview Avenue represents an increased danger to young children who currently play in the Seaview Avenue/Trinity Street area, and to pedestrians crossing the entrance of Seaview Avenue. The proposed development would result in no sight-lines between pedestrian traffic approaching from the north of the junction and exiting traffic. The current usage (Image 2) allows for sightlines and has been proven to be safe, as evident by the lack of any incidents at this junction to date.
- 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.



Image 4 Current access/ exit from Seaview Avenue. Note the sightlines available to drivers exiting the avenue to the footpath and from pedestrians into the Avenue. The proposed junction redesign would remove sightlines for pedestrians and drivers from/to the south of the junction.

- d. 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 has been mis-represented in the Applicant's response that this will not change with the proposed new layout. In reality the change will be from a shared static space for vehicles/ pedestrians (i.e. parked cars with pedestrians walking by, with one lane for traffic entering/ leaving the avenue – Image 2) to a shared space across two active traffic lanes. This is contrary to any good design and ignores even the most basic of safety standards.

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- e. 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 and will negatively impact traffic flow in an already restricted area. The junction of Fisher’s Row/ Trinity Street has been the site of two major traffic accidents in the last three years – a major accident being defined as an accident that required the presence of gardai, ambulance personnel (to attend to car passengers) and fire brigades (to remove damaged vehicles and clean spilled fuel).

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

Applicant response:

“The surrounding streets have capacity to absorb the minor loss of parking and will be monitored on an on-going basis by Wexford County Council.”¹⁹

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. When the subject of parking, traffic management/ planning and the proposed new junction design were raised at the public meeting in September, locals were told that a traffic plan was not in place at that time and the meeting was only to discuss the design of the development and not the connection to the existing road network. When Wexford Council states that “the surrounding streets have capacity to absorb the minor loss of parking”, it must be assumed that the surrounding streets are William Street Lower, Fishers Rowe and Parnell Street. There is no capacity on any of these streets to absorb extra parking demand and the loss of the 18 parking places on Trinity Street is not “minor” to the residents affected by it.

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. While this proposal requires 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. Pay and Display Parking

Applicant Response:

“The proposed parking arrangement are outlined in Section 5.4.8 of the EIAR and the Traffic Addendum in Appendix B1. Parking for residents and business on the surrounding street network will be protected from long-term parking of commuter vehicles generated by the development with the expansion of the permit, tariff and enforcement system which will be

¹⁹ 11.2 Further Information Request Page – Wexford County Council Response, page 48

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reviewed and closely monitored by Wexford County Council.”²⁰

While Wexford County Council introduced Pay and Display parking along Trinity Street in March 2019, the enforcement of the parking rules – especially on the section of Trinity Street south of the Parnell Street junction - has been so sporadic that they are in effect absent. While we – as residents – do not wish to penalise any business, it is imperative that any parking rules are enforced in an equal way on all vehicles in the area. There are multiple businesses on Trinity Street who have vehicles parked for the full working day every day, none of which have permits (thereby ignoring both the 4-hour limit and the need to have a permit). There are also businesses situated out of town who have used spaces on Trinity Street to display vehicles for sale – again parked for the entire day (see Images 3-8 for examples covering April to November).



Image 5 Rental cars parked without tickets on Trinity Street, Nov 2019



Image 6 Full day parking, no permit – March 2019

²⁰ 11.2 Further Information Request Page – Wexford County Council Response, page 60

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Image 7 Cars for sale – April 2016



Image 8 Cars for sale – May 2016



Image 9 Advertising van for rental – July 2019

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Image 10 Advertising on Trinity Street, November 26th 2019. Pictures taken at 9:13am, 1:39pm and 5pm. No ticket displayed.

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

- a. The revised traffic survey carried out between Thursday, 5th to Thursday, 12th September 2019 (Appendix B1, Further Information Request – Wexford County Council Response), was completed at the same time as major road works were carried out along the entire length of William Street (Images 9-11). Traffic that diverted to avoid the roadworks was not measured as there were no surveys carried out on traffic flows in the Faythe or on Lambert Place (the main alternative route used by drivers). As such the traffic survey data does not reflect normal usage and should be discounted.

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Image 11 Roadworks on William Street Lower during the traffic survey between Thursday, 5th to Thursday, 12th September

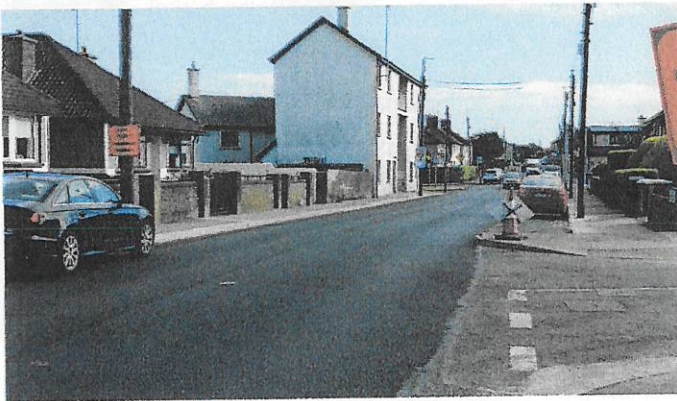


Image 12 Roadworks on William Street Upper during the traffic survey between Thursday, 5th to Thursday, 12th September



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Image 13 Roadworks on William Street Lower during the traffic survey between Thursday, 5th to Thursday, 12th September

- b. Traffic junction counts at Fishers Row/ Trinity Street and Parnell Street/ Trinity Street are compromised by the same traffic works. For example, the number of turns from the Fishers Row into William Street seems to be very low, but can be easily explained when taking into account road works at the junction, as shown in Images 11 and 12.



Image 15 Entrance to William Street Lower with roadworks during the traffic survey between Thursday, 5th to Thursday, 12th September



Image 14 Approach to William Street Lower from Trinity Street with roadworks during the traffic survey between Thursday, 5th to Thursday, 12th September

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- c. The submitted 'Traffic and Transport' report also completely omits two of the main access points to the area affected – the Faythe and Fishers Row. One of these streets is used as a main feeder road to Trinity Street for traffic approaching from the South of the development. 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.
- d. Wexford County Council's response that "Road widths and issues along William Street is an existing issue outside the extents of the proposed development"²¹ is unacceptable as William Street is one of the main entry roads to the proposed site. The acknowledgement that there are issues should not result in a head-in-the-sand response but rather in a pro-active search for viable solutions. Ignoring the current issues on William Street is further thrown into relief by the focus that Wexford County Council has put on areas that are further away – e.g. parking areas as far away as Redmond Square, proposed cycle lanes across Wexford Bridge etc. – all of which are areas outside of the extents of the proposed development.

It is our view 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 as the traffic survey data was not carried out at a time of normal road usage and is therefore unreliable.

6. 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 6 days per week over 80 months²² 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).

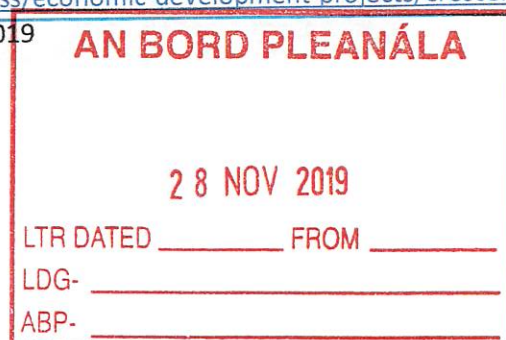
A closer local example has given rise to further concerns – the redevelopment of Crescent Quay works. The original timelines²³ are shown in Image 14, but as of November 26th 2019, the works have still not been completed and have caused multiple traffic issues along the quays over the intervening months.

²¹ Page 53, 11.2 Further Information Request Page – Wexford County Council Response

²² Chapter 18, Mitigation Measures, pg 23; available at

https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity_Wharf_AB/4.2%20Main%20Text/Chapter%2018%20Mitigation%20Measures.pdf; viewed on November 26th, 2019

²³ Available at <https://www.wexfordcoco.ie/business/economic-development-projects/crescent-quay-public-realm-improvement>, Viewed on Nov 16th, 2019



Significant Timelines

November 2018	Part 8 planning process complete
January 2019	Commencement of works
July 2019	Works complete

Image 16 Timelines for completion of work on Crescent Quay, Wexford

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 advance of any works beginning and in the event that the proposed development, or any other future development, commences on the Trinity Wharf site.

We would further note that there has been no such consultation or effort to engage with the community in a formal manner to date.

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 of Trinity Street, Seaview Avenue, William Street and Fishers Row during the entire construction phase and that this space shall be within a reasonable distance from the residents' homes (i.e. no more than two minutes' walk).
- 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
- Wexford County Council shall provide a full site survey for every house in the immediate vicinity (William Street, Trinity Street, Seaview Avenue, Emmet Place, Trinity Place) before and on completion of construction
- 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.

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7. 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.

8. 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 as planned will only add an extra burden on existing amenities.

We welcome the consent of Wexford County Council, subject to securing development consent under a Part 8 process, to develop an urban playground/amenity area for the use of the local community in parallel with this the development of the Trinity Wharf lands and would note that if the original entrance to the site is used the amenity area would be of a size that could cater to the needs of the catchment area.

It is our submission that if the proposal is granted permission the site of the old Cash and Carry be nominated as a designated playground/amenity area for the benefit of existing and new residents (e.g. a 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.

9. 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.

We would further note that the provision of 56 bicycle spaces for non-residents on the site (as per the published planning application the site will host 146 cycle spaces in total, of which 90 will be dedicated to the residential development) is completely inadequate for the 300+ office employees who will not have access to parking (830 employees – 521 parking spaces). Similar to the calculation of the parking figures the proposed hotel employees, convention centre employees, café employees, casual visitors or users of the much publicised proposed Greenway do not seem to have been taken into account when calculating the number of bicycle spaces needed.

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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, 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), and that the provision for on-site bicycle storage either be increased to a level that can cater for all employees and visitors to the site or that the overall scope of the site be reduced accordingly.

10. Efficient use of space

As per Wexford County Council's submission the site has been designed with three office buildings comprising of 16,635 square meters (5,540+6105+4990), for 830 offices employees. As per Wexford County Council's submission this space allows approximately 20 square meters of space per employee.

According to the HSE "4.65m² is the minimum amount of floor space allowed for every person employed in any room, including the area occupied by the office desk and chair but excluding filing cabinets and other office furniture."²⁴ Given that employers rent offices on a per-metre basis and wish to use it as efficiently as possible (to maximise return on investment), it is reasonable to assume that no employer is going to pay for excess space for an employee just because it is available. Allowing over a doubling of the minimum recommendation to 9.3 square meters indicates that the amount of space required to host 830 office employees (the number of office workers given by Wexford County Council) is 7,719 square metres – i.e. slightly larger than the space in the largest proposed office building.

In fact, all 830 office workers could be accommodated in the proposed Building B (6105 square meters), allowing each worker 7.35 m² of space – almost 160% above the minimum required space. This logically leads to the conclusion that the other two office buildings would stand empty, as the site is designed to cater for a maximum of 830 office employees. Therefore, it appears that the construction of three office blocks as proposed is a waste of space, resources and time.

It is our submission that permission to build the proposed office buildings be refused.

11. 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.

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<https://www.hse.ie/eng/staff/safetywellbeing/healthsafetyand%20wellbeing/office%20accommodation%20faq.pdf>, viewed November 16, 2019

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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 sustainable 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 before any further development is considered.

Yours Sincerely

John Hayes.

