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Dear Sir/Madam,

I wish to submit my observations to An Bord Pleanála on the additional information and comments provided by Wexford County Council in relation to the construction of a mixed-use development at **Trinity Wharf, Trinity Street, Wexford, Co. Wexford –An Bord Pleanála Ref PL303726-19.**

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 within this submission will relate specifically to

1. the section “Traffic and Transportation” and the additional information provided by Wexford County Council in Appendix B1
2. the comments provided by Wexford County Council in relation to my submission from 1<sup>st</sup> of April 2019

and conclude with my final thoughts about the proposed development as a resident.

Please note, this submission includes additional observations based on additional information and comments provided by Wexford County Council and is not cancelling out or replacing any observations made in the submission from 1<sup>st</sup> of April 2019.

## **1. Additional Information Provided by Wexford County Council re Traffic and Transportation**

### **a) Traffic Surveys**

As stated by Wexford County Council, the traffic surveys were conducted between 5<sup>th</sup> of September 2019 and 12<sup>th</sup> of September 2019 on Trinity Street, Parnell Street and William Street Lower – the streets specifically mentioned by name by An Bord Pleanála in their letter dating 24<sup>th</sup> of July 2019. No surveys were conducted on “any other street considered necessary” as also requested by An Bord Pleanála. Fisher’s Row, The Faythe, Kevin Barry Street and Lambert Place are adjacent to William Street and Trinity Street and provide links not only to different sections of Trinity Street but also to King Street and are used by motorists to avoid traffic jams on William Street, Trinity Street and also on the Quay in order to get into town centre or to the north side of town. It can only be assumed that these streets are considered by Wexford County Council as an alternative route when it is proposed that delivery vehicles can “circle the block to approach [McMahon Building Supplies]

from the north” (see Appendix B1, p 12) when coming into the area from the south side of town (i.e. from Drinagh coming).

Therefore, I am questioning why no traffic surveys were conducted on these streets.

In addition, at the time of the traffic surveys major road works were in place in William Street Upper, William Street Lower (see image) and at Crescent Quay – however, neither road works are mentioned in the report.



*Image 1: Looking from junction Trinity Street/Fisher's Row/William Street at road works in William Street Lower on 11/09/2019*

Motorists approaching from the southern edge of town increasingly used The Faythe in order to bypass the road works on William Street and associated traffic jams and waiting times due to single lane availability. They then joined Trinity Street again either via Fisher's Row or Parnell Street or crossed over to King Street via Lambert Place to avoid being caught in tail backs on Trinity Street caused by the road works on Crescent Quay.

Concluding, the survey data provided in the traffic report have to be considered as being unreliable as

- the usage of William Street and Trinity Street – the main access roads to the proposed development from the southern end of town – was significantly impacted by road works
- the traffic trying to avoid these roads by using the above-mentioned adjacent road network (i.e. The Faythe, Fisher's Row, Kevin Barry Street and Lambert Place) was not measured.

The above-mentioned road works also need to be considered when analysing the junction counts – particularly the number of right turns from Fisher's Row onto William Street when going south. Motorists again were more likely to use The Faythe to get to the southern end of town rather than using Fisher's Row and then turning onto a road with road works on it. Again, the road works have a negative effect on this data and therefore, the survey results do not reflect normal usage.

Considering these factors, I am asking that permission will be refused until the impact of the proposed development on traffic in the immediate vicinity is fully known.

#### b) Car Park Survey

The car parking survey and analysis provided show that the alternative car parks are predominantly within a 10+ minute walking distance to/from the proposed development at Trinity Wharf. All these car parks are located in town centre – diverting excess parking demand into town centre contradicts the aim of reducing traffic congestion caused by cars in town centre as advertised by Wexford County Council in their original application (see Chapter 5: Traffic Analysis, pp 13, 23; Planning Statement Trinity Wharf Final1, pp 32). Also, the 13 long-term on-street parking spaces at Paul Quay (as shown on the map provided in Appendix AA4 and listed in Chapter 5: Traffic Analysis, p 22) have been transformed into a footpath since the survey has been conducted and the long-term car park at Paul Quay will lose 21 spaces due to the construction of the boardwalk as outlined in the original application in *Chapter 5: Traffic Analysis, p 14*. The loss of 34 spaces is not considered in the survey in terms of capacity. Therefore, the total capacity and the amount of unoccupied spaces considered for overflow parking for Trinity Wharf should be reduced accordingly.

Based on calculations provided in Appendix B1, pp 7, 8 and the parking map shown in Appendix AA4, it seems that the 351 underutilised spaces at peak times of the day include car parks that are more than a ten-minute walk away. While the acceptance of a ten-minute walk from a car park to the workplace by regular/daily commuters is already questionable, it seems even more doubtful whether visitors or workers would use car park facilities further away than a ten-minute walking distance. Therefore, the number of underutilised spaces needs to be significantly reduced to 232 underutilised spaces within a ten-minute walking distance, with only 149 of these being long-term parking spaces. From these 149 spaces, however, the above-mentioned 34 spaces lost on Paul Quay need to be deducted, leaving approximately 115 spaces available for required overflow parking – which requires 130 extra spaces as suggested in Appendix B1, p 8 for the 830 office workers (it is unclear from the planning application where parking is allocated to the guests of the other 60 bedrooms in the hotel that have not been allocated a space, employees of the 120-bedroom hotel, the convention centre and the café/bar/restaurant within the proposed development). Furthermore, the eligibility of the 61 parking spaces available in the Crescent Quay Off Street Car Park North as overflow parking spaces for office workers needs to be questioned as this car park only allows for a maximum stay of four hours – rendering this car park unsuitable and having to be taken away from the overall capacity, resulting in an overflow capacity of only 54 spaces (i.e. which covers only 40% of the required overflow parking).

In addition, most of these car parks (e.g. High Street/Keyser's Lane, Pettit's Supermarket, Rowe Street Church, Clayton White's Hotel) are surrounded by many local businesses such as restaurants, cafés and bars. Once the novelty of the proposed development is over, visitors intending to go to a café, bar or restaurant are more likely to choose premises closer to the place where they can park their car rather than walk 10+ minutes, passing by various alternatives. This can have a negative impact on both businesses (particularly, food related businesses) in the proposed development and existing businesses in town. In addition, visitors intending to use premises on the proposed site will most likely attempt to park as close to the proposed development as possible. However, with the capacity of the car park provided within the proposed development being already below demand and minimally accounting for the day-time use of these premises, visitors will divert to the closest on-street parking facilities – i.e. Trinity Street and William Street.

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The stays of these visitors most likely fall within the maximum four hours allowance of pay and display parking on Trinity Street. With the removal of 18 existing parking spaces along Trinity Street and Seaview Avenue, the remaining spaces will not be enough to accommodate visitors and residents during the day and in the evenings (particularly before and during events) when on-street parking is free of charge. It seems to be assumed that residents do not require parking during the day and unlike stated by Wexford County Council, the adjacent streets of this part of Trinity Street (i.e. William Street Lower and Fisher's Row) do currently not provide enough parking spaces for residents within this area (i.e. elderly people and families with children) within a reasonable walking distance from their homes (as shown in the images below).

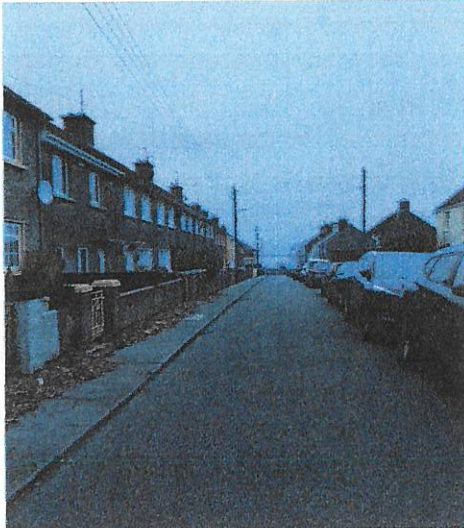


Image 2: Fisher's Row – on-street parking on Saturday, 16/11/2019



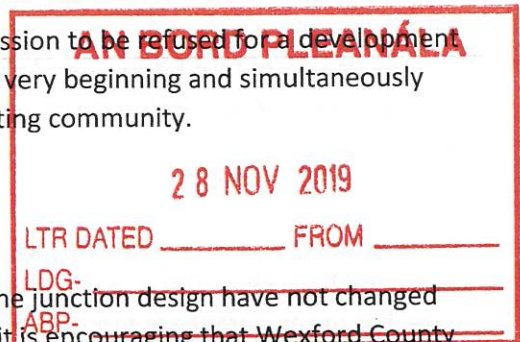
Image 3: Fisher's Row – on-street parking on Wednesday, 20/11/2019  
(Please note: there is one empty space – the remaining gaps are private driveways and the emergency exit from the local primary school)

Furthermore, the pay and display model introduced on Trinity Street is currently only enforced on a very infrequent basis, as demonstrated by a business, car dealerships and car rental using on-street parking spaces within the pay and display area of Trinity Street on a daily basis for multiple vehicles associated with their businesses for more than four hours without any tickets being displayed.

As per my previous submission, I am asking for planning permission to be refused for a development of this scale that provides insufficient on-site parking from the very beginning and simultaneously removes existing parking from the immediate vicinity and existing community.

### c) Junction Design

My observations submitted on 1<sup>st</sup> of April 2019 in relation to the junction design have not changed as the loss of parking spaces for residents is significant. While it is encouraging that Wexford County Council is considering angled parking along Trinity Street between Fisher's Row and the proposed junction, the road safety aspect has to be considered as drivers will have to reverse out against traffic on the main road. The proposal to work with residents to investigate further options to minimise the loss of parking spaces is welcomed but as it is not part of this planning application it is by no means a guarantee of Wexford County Council actually working with residents and finding a solution, after permission might have been granted for this development. At this stage, no formal contact with residents has been made by Wexford County Council.

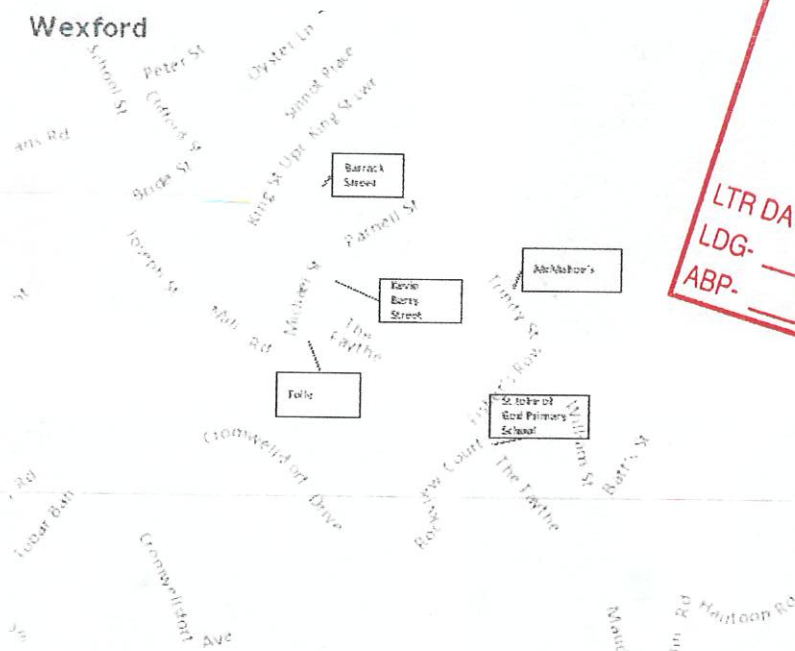


As per my previous submission, I am asking that permission for re-designing Trinity Street will be refused until a satisfactory solution to maintain parking spaces for residents has been found and incorporated within the scope of the development works.

**Regarding the proposals made by Wexford County Council in relation to access for delivery vehicles including HGVs to McMahon Building Supplies:**

As mentioned on page 1, Wexford County Council proposes that delivery vehicles including HGVs approaching McMahon Building Supplies from the south will need to “circle the block” in order to approach the business from north due to proposed junction design and road markings. In practise and as shown on the map below, this would mean that HGVs and other delivery vehicles will have to either

- use the Faythe (entering at the beginning from William Street and passing by the local primary school or go up Fisher’s Row to turn right into the Faythe) → Kevin Barry Street → Parnell Street → Trinity Street
- turn into King Street Lower (at the Talbot Hotel) → Barrack Street → Parnell Street → Trinity Street
- turn into King Street Lower (at the Talbot Hotel) → King Street Upper → Mill Road → The Folly → Kevin Barry Street → Parnell Street → Trinity Street



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Image 4: Wexford Town - The Faythe and Trinity Street area [Source: <https://wexford.maps.arcgis.com/home/webmap/viewer.html?useExisting=1>]

These options not only involve small and narrow streets in predominantly residential areas (as illustrated in the images below) but also mean that HGVs will be directed to pass by the local primary school. During school opening times (i.e. from 08:40 to the evening), over 200 primary school children are entering and exiting the school and at peak drop-off and pick-up times (i.e. from 08:40 to 09:00 and from 13:40 to 14:40), The Faythe is already suffering from heavy traffic congestion. Diverting HGVs through residential areas and by a primary school during opening hours seems to be against the common interest of road safety and seems to also transfer another issue arising from the proposed junction to an existing community and business. And as mentioned above,

no traffic surveys had been conducted in any of these streets to show traffic volumes during the allowed delivery times.



Image 5: The Faythe - looking south [Source: Google Streetview]



Image 6: The Faythe – at local primary school (St John of God), looking north [Source: Google Streetview]

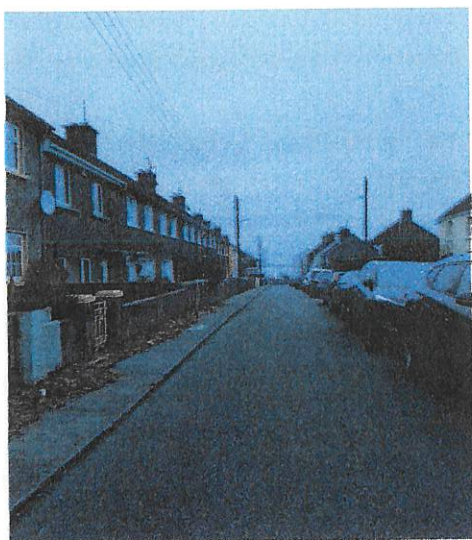


Image 7: Fisher's Row



Image 8: The Faythe – junction Fisher's Row looking north [Source: Google Streetview]



Image 9: The Folly – coming from Mill Road into The Faythe [Source: Google Streetview]



Image 10: Kevin Barry Street – junction at The Swan in The Faythe [Source: Google Streetview]

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Image 11: Kevin Barry Street – looking towards Parnell Street [Source: Google Streetview]



Image 12: Junction Kevin Barry Street – Parnell Street – Barrack Street [Source: Google Streetview]

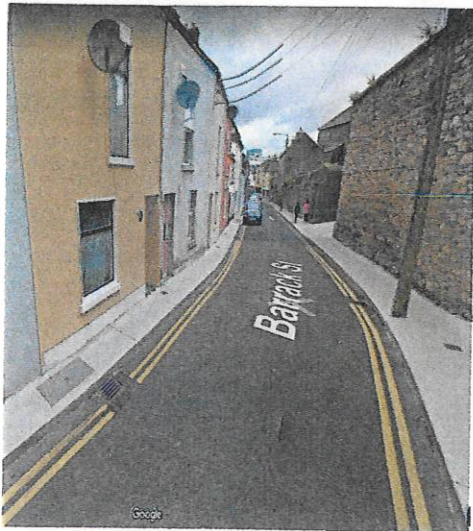


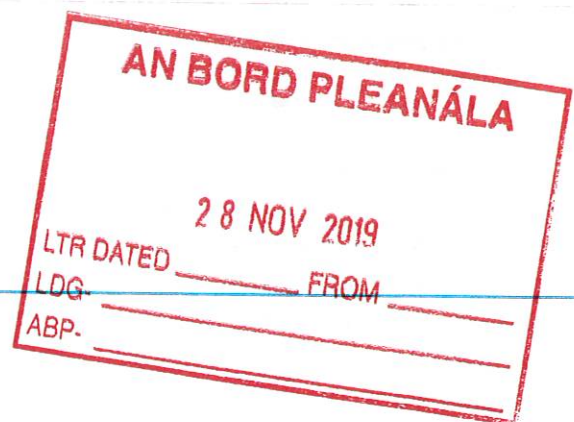
Image 13: Barrack Street – looking towards King Street [Source: Google Streetview]



Image 14: Barrack Street – looking towards junction Kevin Barry Street/Parnell Street [Source: Google Streetview]



Image 15: Parnell Street – from junction Kevin Barry Street/Barrack Street looking towards Trinity Street [Source: Google Streetview]



Due to these reasons (loss of existing parking spaces and diverting delivery vehicles through residential areas with the local primary school), I am asking for planning permission to be refused until a satisfactory solution is found regarding junction location and design.

#### d) Cycle/Pedestrian Access/Proposals

As indicated by Wexford County Council, pavement markings have been introduced within the proposed development to signal shared surfaces between pedestrians and cyclists. However, there are no particular timeframes for the development of cycling lanes/routes within the boundaries of Wexford town and there is no immediate timeframe to introduce a safe cycling infrastructure within the vicinity of the proposed development, i.e. along Trinity Street and William Street – the only access road to Trinity Wharf for cyclist coming from the south at this point of time (with no precise timeframes in place for the introduction of alternative cycling routes from this end of town either).

Considering the deficiencies in the current cycling infrastructure within the vicinity of the proposed development – particularly when coming from the south – and the lack of timeframes (as requested by An Bord Pleanála in their letter from 24<sup>th</sup> of July 2019), I am asking that planning permission for any development on Trinity Wharf with the intention to promote cycling as a means to commute to work will be refused until “aspirations” have advanced into tangible plans with precise and realistic timeframes, and the infrastructure around Trinity Wharf is able to support this intention.

## 2. Comments Provided by Wexford County Council re Submission from 1<sup>st</sup> of April 2019

The following section will provide responses to the comments made by Wexford County Council to my submission from 1<sup>st</sup> of April 2019. All quotes in this section are taken from the document “Trinity Wharf Development – Further Information Response October 2019” which has been provided to An Bord Pleanála and is available under <https://www.wexfordcoco.ie/trinity-wharf-development-an-bord-pleanla-application>.

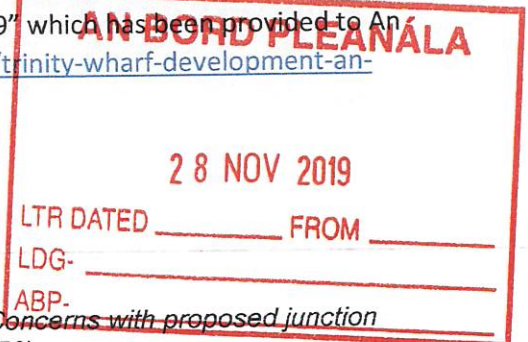
### a) Proposed Junction Not Covered in Public Meeting

#### **Applicant paraphrasing submission:**

***“Proposed Junction with Trinity Street and Seaview Avenue: Concerns with proposed junction raised at public information meeting have not been addressed.” (p 56)***

**Katja Hayes (KH) Response:** This is a case of misinterpretation as in the previous submission it has not been stated that concerns raised had not been addressed but that the proposed parking and traffic management with regard to Trinity Street and Seaview Avenue had not been addressed at/part of the public meeting in the Talbot Hotel on 5<sup>th</sup> of September 2018. When queried by residents, Wexford County Council representatives responded that parking and traffic management was not part of this meeting. The Masterplan as published by Wexford County Council does not include one picture/drawing/plan/map showing the full junction as proposed or Seaview Avenue as part of the scope of this development.

For further clarification, I am including the following screenshots of the Masterplan which are relevant to show Trinity Street or access to the proposed development [Source: Wexford County





Council, Trinity Wharf Masterplan – available under <https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity-Wharf-Merged-document-for-link.pdf>]:



Page 1



Page 2 (the scope of the development ends on the southbound side of Trinity Street)



Page 3 (the scope of the development ends on the southbound side of Trinity Street)



Page 4 (no illustration on the impact of the proposed development on Seaview Avenue)

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Page 5 (no illustration on the impact of the proposed development on Seaview Avenue)

### b) Parking for Existing Residents

**KH Response:** Please refer to page 3 and following for comments and observations.

### c) Seaview Avenue

**Applicant's Response:** "Oil delivery trucks may have to reverse either up or down the lane but this is an existing situation which the development is improving with the provision of traffic signals which will provide a gap in traffic for the truck to carry out its manoeuvre" (p 56)

**KH Response:** While oil deliveries are not a daily occurrence in Seaview Avenue, they do occur on a regular basis and the proposed changes to the layout of Seaview Avenue do not allow an oil delivery truck or any vehicle larger than a van to turn around in order to avoid reversing out onto Trinity Street when exiting. As outlined in the main report of the Road Safety Audit, it needs to be ensured "Seaview Avenue traffic does not reverse onto Trinity Street under the proposed layout" (see *Trinity Wharf Development – Further Information Response October 2019, Appendix AA5*).

Currently (the existing situation), oil delivery trucks reverse into Seaview Avenue from Trinity Street which is possible as there is only two lanes and no signalised junction in place. It is not clear how traffic signals facilitate reversing into a street which is part of a four-way junction as the driver of any vehicle doing so will now have to look backwards to see the traffic lights and will have to be alert of traffic coming from three sides (i.e. from the northbound lane, from southbound lane as the turn into Seaview Avenue might involve crossing over into this lane, and from the proposed development) and of pedestrians (in case the traffic light goes green for pedestrians).

**Applicant's Response:** "The loss of two parking spaces on the public laneway is considered non-significant with adequate capacity on the surrounding streets for parking." (p 56)

**KH Response:** The surrounding streets of Seaview Avenue are Trinity Street, Fisher's Row and William Street. Please refer to page 3 and following of this submission for observations made regarding the lack of parking spaces in surrounding streets.

Furthermore, it is unclear why a turning head which is limited to passenger vehicles and small delivery vans is introduced in Seaview Avenue instead of providing, for example, four extra parking spaces for the residents of Seaview Avenue by extending the proposed turning head and converting it to a "residents only" parking space with parallel parking which will allow "turn-by-parking" as illustrated below:

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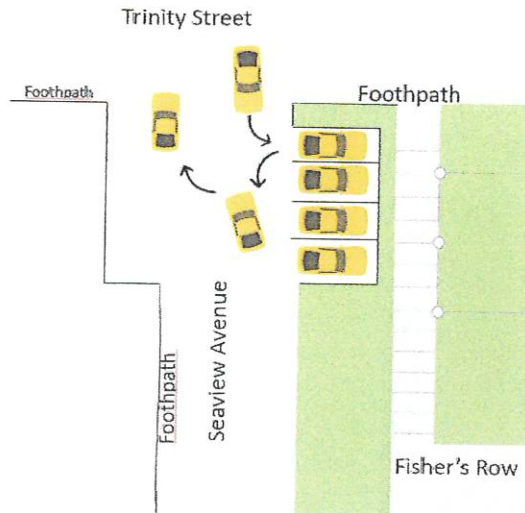


Image 16: Suggested parallel parking in Seaview Avenue  
(Please note: not to scale as only for suggestive purposes)

**Applicant's Response:** "The shared use of the static space is an existing situation which the proposed development is not altering. The shared pedestrian/ vehicle use is considered appropriate as the traffic flow is in the region of 3 vehicles per hour during peak times." (p 56)

**KH Response:** For clarification purposes, the term "static space" is used in the context of this space being used for parked cars and with that no actively moving traffic is occurring on these two spaces. It is unclear what is meant by "which the proposed development is not altering", as this space will turn into an exit lane with a traffic light and hence, it will no longer be available for parking nor will it be a static space in terms of traffic.

**Applicant's Response:** "The traffic signal will be hooded as to avoid causing a nuisance to nearby residents." (p 56)

**KH Response:** As illustrated below, the front door and a bedroom window of 1 Seaview Avenue are facing directly out onto the proposed exit lane and traffic light.



Image 17: Seaview Avenue - existing situation (over multiple decades) re static space being used for parking

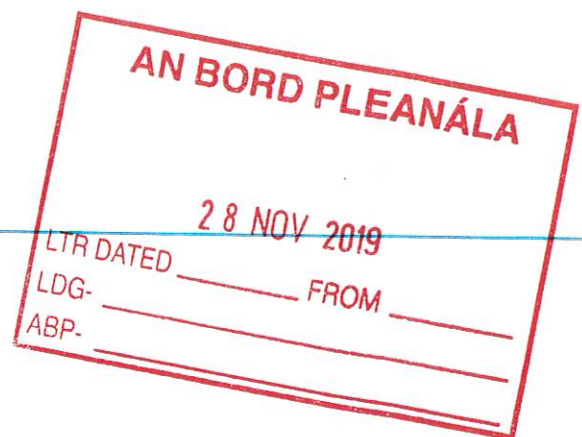




Image 18: Seaview Avenue - existing situation re parking and view from bedroom window onto static space



Image 19: Seaview Avenue - view from front door facing directly at proposed exit lane

Despite the proposal of installing hooded traffic lights, concerns re light pollution coming from the proposed traffic lights remain due to the proximity of the proposed exit lane and traffic lights, the layout of the junction and the existing design of 1 Seaview Avenue.

In addition, concerns exist regarding road safety in relation to the new exit lane as this lane starts directly in front of the front door of 1 Seaview Avenue with no “safe area” for people exiting this property. As shown in Appendix AA3, the exit lane seems to start at the edge of the footpath in front of the front door and there is no visibility for people stepping out of 1 Seaview Avenue onto traffic coming from Seaview Avenue, which needs to change over to the exit lane in order to exit Seaview Avenue – neither is there any visibility for motorists coming from Seaview Avenue onto the immediate space in front of 1 Seaview Avenue.

**Applicant’s Response:** “The visibility issues exiting Seaview Avenue is an existing situation which the proposed junction will improve with the provision of a kerb build out which will improve visibility and traffic signals.” (p 56)

**KH Response:** As illustrated below, the visibility issues exiting Seaview Avenue are limited as currently (the “existing situation”) cars exit Seaview Avenue on the right lane providing approximately two to three metres of extra visibility towards pedestrians coming from town using this footpath. Due to the gable-end of the 2-storey dwelling at the northern border of the proposed exit lane, a blind spot would be created 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 area. 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 (i.e. stopping at a red traffic light), which cannot be guaranteed.

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Approx. two to three metres away from gable end, providing more visibility over footpath traffic and space to react for both pedestrians and motorists

Image 20: Seaview Avenue - existing situation exiting the Avenue on the right lane



Concluding, I am asking for planning permission to be refused until a satisfactory solution is available with regard to the location and design of the proposed junction and Seaview Avenue.

#### d) Traffic along Trinity Street and William Street

**Applicant's Response:** "The junction capacity analysis has been rerun with supplementary traffic data from surveys taken between Thursday 5th and Thursday 12th September 2019 to account for school term traffic and to incorporate Seaview Avenue. The results of the updated junction capacity analysis found that the junctions will operate within capacity at peak development of the site as outlined in Section 2c of the EAIR Addendum." (p 57)

**KH Response:** It is unclear why only the junction analysis is mentioned – the main focus of the submission from 1<sup>st</sup> of April 2019 is on the traffic analysis and traffic congestion along Trinity Street. Also, while the new traffic surveys accounted for school term traffic and incorporated Seaview Avenue, they did not account for the major road works as mentioned on p 1 of this submission.

**Applicant's Response:** "It is not proposed to change the current arrangement of the Wexford Bus stop but it's location will be reviewed by Wexford County Council." (p 57)

**KH Response:** With regard to the location of the current bus stop, I would like to reiterate that the local Wexford shuttle bus is a very important means of transport for existing residents of this area – including many elderly people and children using this bus service and bus stop to commute to schools at the outskirts of Wexford town. From the current plans and existing situation in terms of bus stops before and after Trinity Street and road layouts, it is unclear to where this stop could be relocated to without removing it from this area as neither William Street, Trinity Street nor Fisher's Row have the space to accommodate this bus stop without removing even more parking spaces.

#### e) Access Road from the New Development

**Applicant's Response:** "There were several deciding factors in proceeding with Alignment Option 3 as the preferred option as discussed in 3.7.6.2 Main Access Road. Each alignment option had challenges, but the proposed location is the most preferred for the reasons set out in Chapter 3 of the EIAR. There were no major environmental or road safety differences between the 3 options." (p 57)

**KH Response:** The response provided is contrary to the initial justification provided by Wexford County Council within the application for planning permission. Please find below the original statement from Wexford County Council as provided in “Chapter 3 Alternatives Considered”, pp 17, 18 (available under [https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity Wharf AB/A 2%20Main%20Text/Chapter%203%20Alternatives%20Considered.pdf](https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity%20Wharf%20Main%20Text/Chapter%203%20Alternatives%20Considered.pdf)) – I highlighted the relevant sentences that contributed to my understanding of why Alignment Option 3 was chosen despite providing most challenges:

#### “Alignment Option 1

Alignment Option 1 considered widening the existing access lane between McMahon'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 of both sides of the existing access lane.”

#### “Alignment Option 2

Alignment Option 2 proposed a sinuous alignment connecting to Trinity Street just south of McMahon's Home and Garden building. While the benefits of this option include the land required being owned by the local authority and a desirable gradient being achieved on the entrance into the site, there are also a number of disadvantages associated with this option. Primarily this option would impact negatively on the approach to the development. The design of the proposed development has aimed to visually improve the appearance and visual amenity of this part of Trinity Street through an open and inviting entrance. This option would not offer views into the development from Trinity Street and would block any potential views of the sea for those entering the site. The location of the entrance would also bring users into the site to views of an office block as opposed to other options which lead visitors into the hotel entrance and public plaza area. Overall this option would appear to provide a somewhat unwelcoming, closed off entrance to the site. This option would also sever the entire vacant plot owned by the local authority and would be detrimental to the future development of this site. In addition, the access road would bring traffic closer to the houses south of the vacant plot, with the site management building being located directly behind the adjacent gardens. Plate 3.7 below illustrates this option.”

#### “Alignment Option 3

Alignment Option 3 proposes a straight alignment into the site connecting to Trinity Street, immediately south of McMahon Home and Garden. This was chosen as the preferred alignment as the land required is owned by the local authority resulting in a reduced impact on the vacant plot compared to option 2. The disadvantage of this option is that longitudinal gradients over 5% are required between Trinity Street and the level crossing. Gradients over 5% are not desirable on urban streets where pedestrians are active, however this effect is mitigated due to the short length (50m) of the slope. ... This option will provide those entering the site with an attractive and welcoming view down through the site with sights of the sea and while vehicular users will be directed towards the car park, pedestrians and cyclists will be led into the heart of the development via an entrance corridor, leading to the hotel, café/restaurant and public plaza area. This option will also keep the traffic using the access road further away from the adjacent houses on Trinity Street reducing any potential noise and visual impacts.”

There were no major environmental differences between the three road alignment options although the options with the steeper gradients would be expected to perform worst in terms of air quality and climate. The preferred option, Option 3, will provide a more direct route and a main corridor approach to the heart of the proposed development as a result of its straight approach. The views on approach to the site extending into Wexford Harbour will be visible and will connect the site users to the harbourside location and maritime history of the site as they enter into the proposed development from Trinity Street.”

The information provided within this section of 'Chapter 3 Alternatives Considered' indicates that the main advantages of Option 3 are that Wexford County Council does not have to purchase additional land and it has only little impact on the vacant site owned by Wexford County Council. In addition, it will provide a better view into the proposed development. However, it also states that the options with steeper gradients (i.e. Option 2 and 3) would perform worst in terms of air quality and climate.

This document clearly states that the option that would have most advantages is Option 1. However, Wexford County Council would have to purchase 7m of land in order to widen the entrance.

Therefore, I continue to question the reasoning behind building a completely new access road with above mentioned disadvantages, associated costs and impact on existing traffic layout, residents and businesses, 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.

**f) Visual Impact**

**Applicant's Response:** "There are limited views of the development from Trinity Street, Fisher's Row and William Street. These are largely because of a vacant site formerly occupied by a factory/warehouse building opposite Fisher's Row. This current application includes a landscaped hedge to screen the existing vacant site and define the continuity of the street. However, Wexford County Council has identified that this vacant site provides an opportunity to reintroduce the building line along Trinity Street and to provide an attractively landscaped recreational/play area for the local community. This will form part of a separate future application." (p 59)

**KH Response:** Based on the graphical illustrations provided in the original application – available under [www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity Wharf ABP/4.3%20Figures/Chapter%2011%20Figures.pdf](http://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity%20Wharf%20ABP/4.3%20Figures/Chapter%2011%20Figures.pdf) – the views of the development from Trinity Street, Fisher's Row and William Street cannot be considered "limited". As shown on the following images, the view of the the sea and Raven Point is completely replaced by a view of concrete and glass boxes:

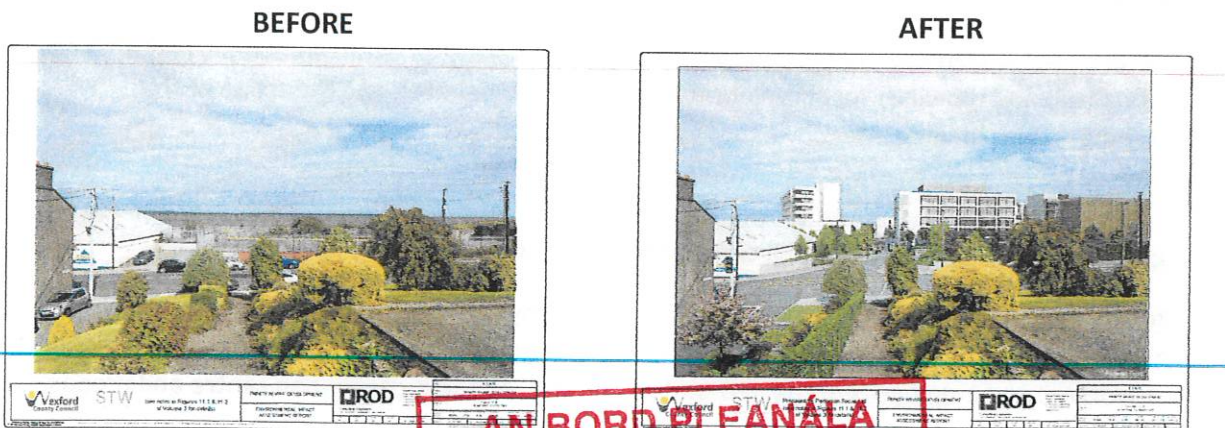


Image 21: View from Seaview Avenue/Trinity Street/Fisher's Row

Image 22: View from Seaview Avenue/Trinity Street/Fisher's Row

**AN BORD PLEANÁLA**

**28 NOV 2019**

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_

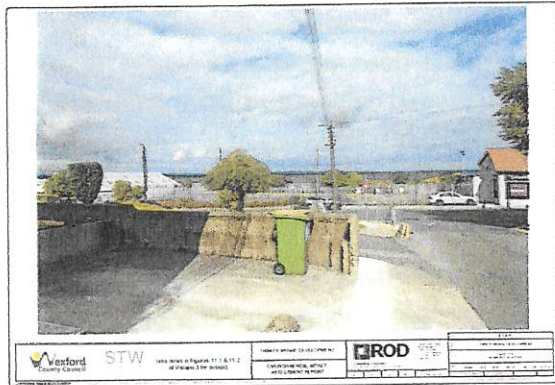


Image 23: View from Fisher's Row/Trinity Street Junction



Image 24: View from Fisher's Row/Trinity Street Junction



Image 25: View from Fisher's Row/The Faythe Junction



Image 26: View from Fisher's Row/The Faythe Junction

As per my previous submission, I am asking for the permission for five- and six-storey buildings to be refused.

While it is appreciated that Wexford County Council identified the opportunity for providing something for the local community by creating an “attractively landscaped recreational/play area” on the vacant site opposite Fisher’s Row, there is no guarantee that this opportunity will be converted into reality.

I therefore ask for planning permission to be refused until plans for this recreational/play area have been finalised and timelines for completion have been incorporated into the scope of this development with binding effect.

**g) Unsustainability and Parking within the New Development**

**KH Response:** Please refer to my observations made in my submission from 1<sup>st</sup> of April 2019 and page 3 with regards to parking within the proposed development and allocation of parking spaces to office workers and employees of the 120-bedroom hotel, 400 seat convention centre and proposed café/bar/restaurant.

Concerns arise from the updated information on the number of office workers which has reduced from approximately 1200 to 830, but no adjustments have been made to the amount of office space planned on the new development. The reduction of office workers by one third would suggest that one third of the office space (e.g. at least Office C (as labelled in document Chapter 4: Figures

**AN BORD PLEANÁLA**  
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 ABP- \_\_\_\_\_



available under

[https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity Wharf ABP/4.3%20Figures/Chapter%204%20Figures.pdf](https://www.wexfordcoco.ie/sites/default/files/content/SpecialProjects/Trinity%20Wharf%20ABP/4.3%20Figures/Chapter%204%20Figures.pdf)) is no longer required. Removing Office C could also have positive impacts on the visual impact of the development on the surrounding area. Reducing the office workforce but not the space may either suggest indecisiveness or inconsistencies in planning or create the risk of having empty buildings on the site.

#### h) Cycling Access to New Development

**KH Response:** Please refer to page 8 of this document for comments in relation to cycling access.

#### i) Construction Phase

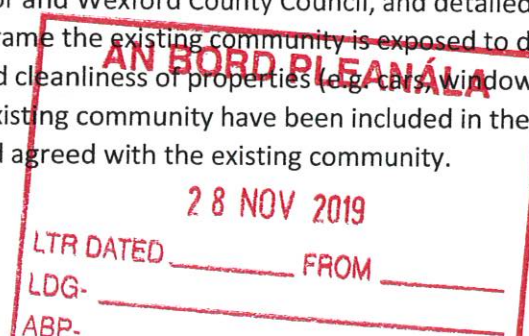
**Applicant's Response:** *"The Construction Traffic Management Plan will be prepared by the contractor undertaking the works. ... Mitigation measures as deemed necessary have been proposed based on this construction sequence and programme."* (p 60)

**KH Response:** As the construction of a development to the scale of the proposed development has significant impact on traffic, noise and air quality on the local community in the immediate vicinity of the proposed development, the "Construction Traffic Management Plan" and concrete mitigation measures should be clearly laid out in the application for planning permission. In addition, exposing the existing community to construction work for 80 months (i.e. six years and eight months) with working hours from 07:00 to 19:00 Monday to Friday and from 08:00 to 16:00 on Saturdays requires a lot more details in the mitigation measures than just statements starting with "the construction company will..." if support from the existing community is sought.

**Applicant's Response:** *"Most of the work activities over the duration of the construction programme will be confined to the development site with very little traffic generated on the road network. Earthworks is anticipated to generate the most traffic with haulage of fill and cut materials, but an analysis found that its impacts will be temporary and non-significant on the road network."* (p 60)

**KH Response:** With regards to earthworks required for the construction of the proposed development, the response focuses predominantly on the actual Trinity Wharf site and the issue of traffic generated during this construction phase. The response does not address any earthworks required on Seaview Avenue, should the redesign of this area be allowed to facilitate the junction – I can only assume that removing part of the banks bordering Seaview Avenue will have to be removed for the proposed turning head. This will also require the implementation of stabilising measures – all of these works will cause air, noise and dirt pollution and are to be carried out in very close proximity (approximately three metres) to 1 Seaview Avenue. It is unclear what exact mitigation measures are in place to ensure no damage will be done to the structure of the properties in such close proximity.

I therefore ask for planning permission to be refused until a detailed Construction Traffic Management Plan from the contractor and Wexford County Council, and detailed mitigation measures related to prolonged timeframe the existing community is exposed to during the construction phase and the safety and cleanliness of properties (e.g. cars, windows, structural integrity of houses, gardens) of the existing community have been included in the planning application and communicated to and agreed with the existing community.



### 3. Final Thoughts and Conclusion

As in my submission from 1<sup>st</sup> of April 2019, I firstly would like to reiterate 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.

However, despite the further information provided by Wexford County Council and some re-designs, I still feel that Wexford County Council is putting all its focus into meeting its own needs with the proposed development. The new document submitted by Wexford County Council indicates possibilities of provisions for the existing community – such as a recreational/play area for the existing community, or working with the community to find solutions regarding parking. However, these possibilities are theoretical and there is no guarantee that they ever will become reality.

It appears that important areas such as Trinity Street, William Street and the adjacent road network, and the vacant site opposite Fisher's Row are included in the scope of this development when it benefits the proposed development (e.g. altering the vacant site to facilitate the proposed junction, proposing the adjacent road network as an alternative route for delivery vehicles approaching McMahan Building Supplies). However, these areas are excluded from the scope if it comes to conducting traffic surveys (e.g. no surveys were conducted in any other street than those explicitly called out by An Bord Pleanála), finding solutions to existing issues that will be exacerbated by the proposed development (e.g. parking for residents, safe cycling infrastructure, traffic congestion) or to making provisions to the existing community (e.g. a recreational/play area).

Concluding, I still believe 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 within and around the proposed development) that would be required for a successful, sustainable urban development.

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

Yours sincerely,



Katja Hayes

