

From: Fiona McLernon [REDACTED]
Sent: Tuesday 3 January 2023 19:50
To: Development Plan
Subject: Proposed Amendments to the Draft Clare Draft Development Plan 2023-2029
Attachments: FionaMcLernon_ Clare Development Plan Submission.pdf

Hello,

Please find attached my comments on the proposed development plan for consideration.

Kind regards,
Fiona McLernon
[REDACTED]

PROPOSED AMENDMENTS TO THE DRAFT CLARE DRAFT DEVELOPMENT PLAN 2023-2029

Gort Road Housing (Site R15 in current plan/ Site R11 in proposed plan)

Page 93-94 of the Ennis Municipal District details the site in question and states the following:

'R11 Gort Road/Hazel Lane

This site is considered to be suitable for high-quality residential development which will complement and enhance the character of the adjoining Hazel Lane. An innovative layout will be required to ensure that dwellings address both Hazel Lane and the open space/wetland area to the south. Vehicular access to the site shall be from Hazel Lane. It is important that development taking place on this site does not impact on the drainage of the site or the operation of the drainage system in the area. In this regard a hydrology assessment must be undertaken as part of the preparation of development proposals. Surface water run-off from development on these lands must be managed to minimise the speed and quantity of run-off to the open space area to the south of the subject site. This site is mostly located in Flood Zone C within some encroachment onto Flood Zone B. Therefore a Flood Risk Assessment must be carried out in relation to future development proposals. The Flood Risk Assessment must be prepared having regard to the information set out in Volume 10(c) of this Plan.

The development of this site presents opportunities to provide innovative building design which demonstrates a high level of energy efficiency, energy conservation and use of renewable energy sources. The design of any future developments on this site must retain the existing stone boundary wall and perimeter boundary of trees, except where their removal is necessary to provide safe vehicular access to the site.'

The residents of [REDACTED] and the other homes along Hazel Lane do not believe that having the vehicular access point to the proposed development site from Hazel Lane will, as the proposed development plan suggests 'enhance the character of the adjoining Hazel Lane'.

What are lines on a page or words on a document to those preparing the development plan, are changes that have a direct effect on the lives of the residents of [REDACTED] Glenina and Hazel Lane. While we look favourably on the development of the site for residential use, we have concerns about how access and boundaries may affect our laneway for the following reasons:

ZONING

[REDACTED] and Hazel Lane sits on land zoned 'Existing Residential'. The description of this zoning use as per page 281 of the current County Clare Development Plan is as follows:

'The objective for land zoned 'existing residential' is to conserve and enhance the quality and character of the areas, to protect residential amenities and to allow for small scale infill development which is appropriate to the character and pattern of development in the immediate area and uses that enhance existing residential communities.'

To add an access road and additional traffic to the quiet natured laneway does not conserve or enhance the quality and character of our homes. The resident of [REDACTED] Glenina and Hazel Lane are in agreement that the sheltered nature of the laneway and tree lined street adds to the character of our homes. This affords us with a sense of privacy and proximity to nature that we would lose if a development was to proceed as per the site description in the proposed development plan, and this would not be in tandem with the objective of the zoning of our homes.

COMMUNITY

Since the early 90s and before, the residents here have enjoyed living quietly on our little cup-de-sac, we are all aware that change is inevitable and that our built environment is always in a state of flux. While we are not against the residential zoning of the land, we would ask that you protect our hedgerow and not increase traffic along our laneway.

With the Design Manual for Urban Road and Streets, (DMURS) promoting home zones and community

oriented housing developments - I ask you not to take these pre-existing qualities away from our laneway. As a child I played on the road with my neighbours, as a teenager my neighbours were some of my closest friends, all of the residents know each other, salute each other and look out for one another. We already have a community amongst ourselves, all of the qualities that DMURS promotes when considering the design of a new development. If access to the new development branches from Hazel Lane, and the laneway becomes a thoroughfare, we will see an increase in traffic that will segregate that community spirit, particularly to those of us in █ Glenina who face directly onto the subject site. The laneway has acted as a home zone long before the term became part of mainstream use.

On the lane, one feels sheltered from the busy town life that is just 1km beyond - this is rare in such an urban environment and in my opinion, as both a resident and as an architect, is the atmosphere that we should all be striving to achieve for new developments in such locations and is deserving of protection - No one wants to feel like they are living in a sea of housing. The set-back building line together with the narrow width of the road and the height of the existing treeline creates a balanced sense of enclosure along the laneway. I've heard first hand from some of our newer residents that the atmosphere and protected enclosure of the laneway was a positive factor in their decision to take up residence here. Our laneway is home to all ages and abilities, young children, young couples, the elderly retired, those caring for their children, and those caring for their parents. Uniquely this is not only home to a typical resident, it is also home to those who live with the Brothers of Charity. For the last 20 years the Brothers of Charity have had quiet enjoyment of the laneway, with it providing a short, quiet, and safe place to get out for a short walk or breath of fresh air, away from traffic.

STREET DESIGN

When thinking about section 3.2.1 of The Design Manual for Urban Roads and Street which deals with movement functions, The Gort Road would fit the criteria to be classified as an Arterial Road given the traffic loading the street experiences, the roadway to the south of the site in question, if built today would be classified under the DMURS definition of a Link Road as it accommodates many houses and other streets branch off of it. Hazel Lane on the other hand would be classified as a Local Road, and I believe is not in a position to serve more units than at present.

Historically, access to the site would have been via the pre-existing entrance to the western boundary of the site, along the Gort Road. In the lifetime of the residents here, this was in active use as a dwelling once stood to the north west corner of the site. While I recognise that this is not wide enough to accommodate traffic to a 20-unit housing development, I wish to highlight the precedent in my lifetime of an additional junction along the main Gort Road – which thanks to the Ennis bypass sees less through traffic now than it did when this junction was in use previously. In addition to this, the road to the south is far wider and has a junction with the Gort Road that is wide enough to accommodate a controlled junction or roundabout, as well as increased traffic loading. In the history of the site, the previously successful development proposal on the site had its access point branching from the road to the south.

For the length of the site, the southern and western boundaries have no house facing directly onto it. It is only the northern and western edges that have a direct relationship with the site so I ask you to please give these boundaries special consideration, which regard to site access, building orientation, buildings heights, glazing positions, and site finishes.

While I'm aware that the land to the southern half is zoned for open space, given that this portion of the site is more prone to flooding, work will need to be done here to improve how the site deals with storm drainage and for the implementation of SUDS.

When developing the design for the development, I ask you to keep Objective 4.15 of the Clare Development Plan to the forefront of your attention. Objective 4.15 of the Development Plan titled 'Green Infrastructure in Residential Developments' states that:

'It is an objective of the Development Plan: To ensure that green areas associated with new residential developments enrich the quality of life of local residents and provide ecologically rich

areas that enhance biodiversity and contribute to the green infrastructure network in the County.'

To remove the planting along the northern site boundary and use our laneway as the vehicular access point would go against this objective since it would not enrich the lives of local residents, which this objective clearly outlines as an important factor to Clare County Council in the provision of new residential developments.

ROAD WIDTH

As outlined above, the laneway is not capable of serving more vehicular traffic - one solution to this would be to widen the roadway, but as discussed below, this is problematic. Widening the road would see the removal of the old stone walling, hedging, and mature tree line (all of which are marked to be retained in the proposed development plan).

It's well established that wider roads = faster speeds = a less pleasant & less safe environment. With DMURS promoting narrower carriageways as a tried and tested means of reducing speed and creating more people-orientated rather than car dominated neighbourhoods, it is counterproductive to widen our roadway. Referencing The UK Manual of Streets, the Design Manual for Urban Roads and Streets directly states in Section 4.4.1 that: 'Research from the UK has found that narrow carriageways are one of the most effective design measures that calm traffic'. Widening the road width heightens vehicle priority and goes directly against the design approach that should be adopted.

Adding to this, the wall to the south of our laneway means that at present any on-street parking is confined to one side of the road. The presence of this informal parking practice serves a positive purpose as it, along with the narrow road width, reduces a motorist's ability to move at speed on the road. In the road is widened, the adjusted southern edge of the road is likely to be flanked by another footpath, which is also likely to see motorists park up on it – saturating the street line with cars as there is no space to provide additional guest parking on Hazel Lane. The removal of the tree line would also add to noise and air pollution.

TRAFFIC

The development plan suggestion to access the subject site via Hazel Lane seeks to over double the amount of houses that the existing roadway serves. At present, during peak traffic periods, the residents of [REDACTED] Glenina & Hazel Lane are often left relying on the goodwill of south bound traffic to exit onto The Gort Road, or the good fortune that a pedestrian is using the pedestrian crossing a short distance north of the junction. This junction also faces Hogan's convenience shop which sees customers pull in and out of their confined front yard space regularly, adding to congestion at a pinch point in the Gort Road's width. There is little that can be done to alleviate pressure at this junction as there is no space to add in a right turning lane, and widening the junction is not possible as it is tight against the site boundary of [REDACTED] Glenina.

SITE ENTRANCE

Reusing the existing entrance point to the western boundary along the Gort Road is a more favourable approach than accessing the site via Hazel Lane. This point on the Gort Road is wider than the junction with Hazel Lane, and so there is potential to introduce a small right-hand turning box on the north bound side of the Gort Road to alleviate traffic at the junction. Section 3.4.2 of DMURS addresses Traffic Congestion and states 'More frequent minor junctions with fewer vehicle movements calm traffic and are easier for pedestrians and cyclists to navigate.' Following this guidance, a new junction in place of the existing site entrance along the Gort Road would be a more favourable experience for both pedestrians and motorists. Simply adding a painted yellow box will alleviate any potential difficulties entering and exiting the new junction from the Gort Road as motorists are required not to enter the yellow box unless they can clear it, as stated in the Rules of the Road.

Widening the existing junction negatively affects pedestrians as it increases crossing distances and there is not sufficient space to create a set-back crossing if corner radii were to increase (which DMURS also advises against). Following the advice of the above quoted Section 3.4.2, the suggestion to re-use the existing exit would also be favourable to pedestrians as they are less likely to meet heavy traffic at a singular junction – and a new junction gives rise to the design team to create one that is fully DMURS compliant and puts the pedestrian first.

The proposal to enter the site via the road serving [REDACTED] Glenina and Hazel Lane is also not the most economical option. With proposals to remove the boundary trees with Hazel Lane, potentially widen the roadway and associated re-surfacing works comes expenses that can be avoided if the entranceway with the Gort Road is re-used. The site boundary with [REDACTED] Glenina and Hazel Lane is approximately 130 meters of roadway which does not need to be effected to facilitate the development of the subject site.

BIODIVERSITY & HERITAGE

The subject site is flanked along its northern boundary by a stone wall, mature trees, and hedgerow that also bound numbers [REDACTED] Glenina and Hazel Lane. The line of this boundary is evident as far back as the 6" OS map which dates from 1829-1841. The uncut limestone walls that enclose two sides of the site also highlight these site boundaries as long standing traces on the urban landscape.

With protection of our biodiversity & heritage more important now than ever, it would be counterproductive to remove mature trees & traditional limestone walling from an urban location.

Directing your attention again to the paragraph of the proposed development plan which details the site in question, this states:

'The design of any future development on this site must...' (not should – must) 'retain the existing stone boundary wall and perimeter boundary of trees, this is caveated with 'except where their removal is necessary to provide safe vehicular access to the site'.

I ask you to consider the wording of this carefully. Via Hazel Lane is not the only location that will facilitate safe vehicular access. At this point, I again wish to highlight to the pre-existing access point to the site along the Gort Road, and the pre-existing Link Road to the south of the site, and ask you to consider, in 2022-2023 if you are going to let vehicular access triumph over pedestrian activity, community amenity, and the protection of heritage and biodiversity in our town.

This planted edge is a rare example of a mature hedgerow and stone walling in a rapidly urbanising suburban location. The hedgerow is also home to wildlife - with lots of birds nesting amongst the trees. How often can you wake up and hear birdsong in such an urban location? It's well documented how important the protection and active promotion of biodiversity in urban and suburban locations is – as extensively explained in Chapter 14 of the current Clare County Council's Development plan. Quoting section 14.3.16 of the development plan:

'Townscapes and landscapes generally benefit from the presence of trees as they soften the line of buildings, contribute to a sense of place, act as wildlife habitats and corridors and provide scale to buildings and streets. They also filter out noise, dust and pollutants. Plant and soil cover act as important carbon sink, retain moisture and prevent flooding.

Hedgerows have been an important feature of the landscape in County Clare for centuries. They provide a habitat for many species and also act as wildlife corridors for animals to move along for breeding, feeding etc. Where breaches to hedgerows occur Clare County Council will facilitate and encourage their replacement.'

In addition to this, objective 14.17 D of the current development plan clearly states that it is the objective of Clare County Council to:

'To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/ sensitive replanting of native tree species;'

I would like to draw particular attention to the words 'retention and conservation of existing hedgerows and trees' within this objective. It is conflicting to both promote the retention of existing foliage, and also suggest that via Hazel Lane is the best access point to the site.

Chapter 4 of the current development plan deals directly with Housing. In particular, section 4.3.14 Green Infrastructure within Residential Developments states the following which I would like to draw your attention towards;

'In many cases the 'greening' of residential areas focuses on the requirement to provide a percentage of open space, back gardens/ balconies, privacy strips and street planting. Quantity can often take precedence over ecological quality and function. Levelled areas of grassland provide ease of maintenance but have limited eco-system benefits. Open spaces in residential developments can be enriched by retaining and enhancing existing natural features as well as introducing additional features. New developments will be required to ensure that quality takes precedence through the incorporation of eco-system benefits alongside established features e.g. the retention of existing and/or the provision of new edges rich in biodiversity such as tree-lines, hedgerows, wetland areas or meadow planting which can be provided in conjunction with recreational amenity facilities. Regard should be had to the adopted Clare Biodiversity Action Plan and County Clare Heritage Plan in the design of green areas in residential developments.'

To remove mature foliage when other solutions prevail seems illogical.

CONCLUSION

To summarise, we are not against the provision of housing, we just ask that you leave the laneway intact. The access point to this site, at the scale of the creation of the development plan for the entire county might seem minor, but this has a real impact on those who live in the area in terms of a sense of community, street design and privacy, biodiversity, and traffic. I hope you take these comments into consideration when finalising the new development plan.

Thank you,
Fiona McLernon B.Arch

