

**Proposed 43 Unit Social Housing Development
Clonmacken, Limerick**

Appendix A

**DESIGN & DELIVERY SERVICES
SUBMISSION RESPONSES**

Part 8 Planning Ref: 18/8008

The following are responses prepared by Design & Delivery Services on behalf of the Local Authority to various issues, themes, and concerns commonly arising across received submissions and observations:

RESPONSES TO COMMON SUBMISSION ITEMS:

Response 1.0 - Social Integration:

In response to the housing crisis currently being experienced across Ireland, but most pronounced in the larger urban centres, this development proposes the construction of a new 43 unit social housing scheme comprising a variety of unit types (one, two, three, & four bedroomed). Such is the need for additional social housing units, that all avenues available to the Local Authority for the provision of social housing are being pursued. Such approaches include provision of new units by means of new-build house construction, buy and renew developments, acquisitions, long-term leasing, Part V acquisitions and provision of supports for private sector rentals. The housing crisis is not just a crisis of social housing but a crisis of all housing. Decreased levels of house construction activity through the last decade have resulted in a housing deficit across all tenures. For this reason, new houses must be provided and in significant quantities.

Mixture of tenure is a fundamental tenet promoted by the Local Authority in its approach to housing provision across the City and County. Pepper-potting of social housing units within tenure-blind developments is accepted as the optimum approach to a socially integrated society. While individual house purchases, leases and Part V acquisitions best fulfil this objective, the shortage in overall unit supply is such that demand cannot be met by means of these avenues alone. While new house delivery through private sector construction activity has commenced, the rate of supply remains at substandard levels falling short of documented levels of need. With in excess of 4,100 applicants (comprising individuals and family groupings) on the Limerick metropolitan area housing waiting list, supply of additional social housing units must be supported by Local Authority direct provision.

While ghettoization and anti-social behaviour have a tendency to be equated with large, lower socio-economic, mono-tenure developments, factors such as development scale, layout design and connectivity influence how well such developments perform and integrate within their surrounding context.

Arising from past experiences of constructing large, mono-tenure, social housing developments comprising hundreds of units (in excess of 1,100 units constructed in both Moyross & Southill) on the periphery of the city, the Local Authority will now only consider, in very limited situations, construction of mono-tenure developments of greater than 50 units. One such scheme, comprising 81 social housing units, has recently been completed at Lord Edward Street.

The site of the proposed Clonmacken development is located within an area where established residences are predominantly in private ownership. In this context, a scheme of 43 social housing units does not compromise or represent an unbalancing of the broader tenure mix. The proposed development is of a shallow layout design with units stringing along the site and directly addressing the Condell Road. The linear style of this development is such that the scheme actively engages with its peripheral surroundings as historically compared to many previous inward looking developments that can so often become self-isolating, concealing within them, secluded areas where anti-social behaviour flourishes in the absence of the passive and passing surveillance generated by through movement.

In this case, the positive relationship between the development and the Condell Road as an inherent deterrent against anti-social behavioural activity.

Response 2.0 - Development Location:

The development site is part of an overall Local Authority owned landholding located west of the R527 Condell Road narrowing as it stretches from the river Shannon northwards toward the Clonmacken Roundabout. The subject development proposal pertains to the upper / northern part of these lands (closest to the Clonmacken Roundabout) which are not subject to flood risk as determined by a site-specific flood risk assessment.

The site of the proposed development is located approximately 200m south of the Clonmacken roundabout and approximately 800m (10-12 minute walk) southwest of the major northside retail (Jetland) and leisure centre which is serviced by a public transport (bus) link into the city centre. The site is located approximately 2.5km west of the city centre to which it benefits from direct access via the Condell Road and its established ancillary cycle-ways and riverside walkway. The riverside walkway, which stretches from the Clonmacken roundabout into the city centre, is a recreational amenity much-used by the cities inhabitants.

The R527 Condell Road, which bounds the site on the east, is a regional road distributing traffic directly into the city centre via the Shannon Bridge. Safe pedestrian crossing facilities (controlled crossing) exist at the Clonmacken Roundabout along the natural route from the development site to the nearby northside retail & leisure centre.

The proposed use of the site is appropriate to its zoning within the context of the current development plan and the general area is a location of planned future expansion within the city environs. A permission for development of 400+ new residential units (Planning ref: 07/2530) exists on lands immediately west of the site while a development of 110 residential units, on a site located across / east of the Condell Road, is the subject of an active planning application (Planning ref: 17/470 - decision to grant permission subject to An Bord Pleanala appeal).

Response 3.0 - Sustainability:

In the context of sustainable urban development, the proposed development location, some 2.5km west of the city centre, represents a 30-35 minute walk or an 8-10 minute casual bike ride into the city centre. In a city context, this represents a very attractive proposition for prospective urban dwellers seeking to avail of the proven health benefits associated with such cost efficient and sustainable means of transport.

The development is well-serviced by means of designated cycle-ways with city-centre bound lanes (inward and outward) provided along the R527 Condell Road

From the perspective of a more localised walkable neighbourhood, the proposed development site is located approximately 800m (10-12 minute walk) southwest of a major northside retail (Jetland) and leisure centre which is serviced by a public transport (bus) link into the city centre from that point. Pedestrian access from the proposed development site to the local centre is facilitated via a pedestrian prioritised crossing point across the Condell Road located at the Clonmacken roundabout. Other services (schools, medical facilities etc) are further distributed across the north side of the city and within the city centre.

Development car parking provision is in accordance with current development plan standards while secure bicycle parking can be facilitated within the curtilage of each development unit.

Response 4.0 - Development Proposal:

The 43 unit, mixed, two and three-storey development comprises 3 no. one-bedroomed units, 19 no. two-bedroomed units, 17 no. three-bedroomed units, and 4 no. four-bedroomed units.

In response to site geometry and other influencing factors, the building modules, composing the above noted accommodation schedule, are predominantly combined of a two-storey, broken, linear terrace extending south to north along the rising, western site boundary juxtaposed with a three storey, block containing duplex type units at the lower, southern end of the planned development site.

Building lines are held back from the Condell Road, buffered by the internal vehicular and pedestrian circulation network and a linear component of landscaped public open space extending toward the Condell Road and the existing riverside walkway where a soft landscaped treatment defines the development boundary. The internal pedestrian circulation network interconnects with the passing riverside walkway at a number of points to support broader context connectivity. A second component of public open space on the lower southern end of the site serves to buffer the development from the remaining undeveloped component of Local Authority owned lands to the south.

The two-storey 'spine' terrace is comprised of a particular shallow-plan unit type that strategically focuses the upper level habitable rooms toward the public side of the development thus avoiding upper level overlooking to the rear. The 'spine' backs up to the existing western site boundary enclosing a development plan compliant quantum (per unit) of private open space there between. On adjacent lands beyond the western site boundary, a permitted residential development (Planning ref: 07/2530) also proposes to back up to the common boundary. The two-storey 'spine' terrace is strategically broken at a potential interconnection point between the two adjoining housing developments in order to facilitate provision for such connectivity. The site entrance coincides with this potential inter-development connection point.

South of the access point from the R527 Condell Road, the three-storey block is cited between the two-storey 'spine' and the Condell Road where site dimensions widen. Units comprising this high-density block are again, strategically laid out to ensure that upper level habitable rooms overlook peripheral public open space in lieu of private open space to the rear. All units have own door access at ground level avoiding opportunity for communal interface within enclosed spaces. The majority of units have direct access / allocation of secure, private, external open space at ground level to the rear of the building for storage of bulky items such as bicycles. Upper level apartments have internal storage capacity for bicycles / buggy's at ground level entrance halls. Integrated bin-stores are provided throughout the development within the 'front garden' median zone straddling between building and street edge. Visitor bicycles can be securely parked within this zone.

The concentration of positive over-looking from the public facades of the various housing blocks contributes to a high level of passive surveillance across the peripheral public realm areas. Large blank gable areas are avoided in favour of providing active overlooking. This approach seeks to create public realm environments inconducive to the tolerance of anti-social behaviour. The varying orientation of the three-storey block, which comprises active living spaces on upper levels, also contributes to the extended provision of passive surveillance across the riverside walkway beyond the extents of its immediate boundary with the development.

The massing & scale of the development respond to that of other recent residential development prevalent in the area. In the same manner that the three-storey terraces of the nearby 'Cluain Dara' development serve to mark the approach / transition from rural to urban, this development will also define the cities built edge. The two-storey spine block responds in building height to that established by other existing detached residences located on equally elevating lands stretching between the site and the Clonmacken roundabout. The architectural language of pitched roofs and brick / render material mixture responds to local context.

Response 5.0 - Impacts on the R527 Condell Road:

The R527 Condell Road is a regional road distributing traffic around the north of the city and into the city centre at the Shannon bridge. Nearby junctions with the N18 southern bypass road promote use of the R527 as a primary access route directly into the city centre. A Traffic and Transport Assessment and Road Safety Audit were prepared to examine the impacts of the proposed development on the R527 Condell Road and its user groups (including vulnerable users). The Traffic and Transport Assessment found that queuing currently occurs on the Condell Road at peak commute times when traffic backs up from the city centre from where it is unable to disperse sufficiently quickly on the Condell Road approach.

It has been determined through two large, nearby, planned, residential developments (Planning refs: 072530 & 17470 cumulatively comprising 500+ units), both of which are proposed to be accessed via the Condell Road, that junctions with the Condell Road should be limited in the interests of proper planning and traffic management. Access to these larger private developments is proposed via a common signalised junction located further along the Condell Road south of the proposed social housing development site.

The Traffic and Transport Assessment considers that the 43 unit social housing scheme will not materially impact or decrease the vehicle carrying capacity of the Condell Road nor significantly add to congestion on the road by virtue of its scale and the lower level of car ownership attributed to social housing developments.

The Road Safety Audit independently considers the design of the proposed Condell Road junction layout, the internal circulation routes and all associated interfaces with less vulnerable road user groups (cyclists and pedestrians). Potential issues raised within the Road safety Audit have subsequently been resolved to the satisfaction of the independent auditor.

Response 6.0 - Impacts on Existing Amenities (walking routes):

Located approximately 2.5km west of the city centre, the city centre is directly accessible from the development via the Condell Road and its ancillary cycle-ways and riverside walkway. The riverside walkway, which stretches from the Clonmacken roundabout into the city centre, is an off-road, recreational, amenity much used by the cities inhabitants.

The proposed development site is bounded by the existing riverside walkway. The development does not seek to alter the course of the existing walkway save where it is traversed by the development access point from the R527 Condell Road. At this point, the walkway is contoured locally for improved visibility and to tie-in with the development junction. An uncontrolled pedestrian crossing point is proposed at the interface to permit walkway continuity. Dimensions of the access road are kept to appropriate minimums for traffic calming purposes while road and walkway surfaces are treated to promote easy and safe pedestrian crossing.

A number of pedestrian linkage points are proposed at various distributed intervals along the development boundary to facilitate permeability between the proposed housing scheme and the riverside walkway. The walkway is proposed to be separated from the housing development by means of a definitive hedge boundary treatment. A landscaped linear park will extend further along the development side of the shared boundary further separating buildings and development activity from the existing off-road walkway preserving the green context associated with the recreational facility.

The walkway will be the primary means for pedestrian connectivity between the development, the city centre and the local northside Retail / Leisure centre. Approximately 200m north of the site, a controlled crossing point at the Clonmacken roundabout provides a safe means for crossing the Condell Road. Other pedestrian crossing points are not promoted or envisaged.

While access to the local Retail / Leisure centre might also be facilitated via the Old Clonmacken Road, the natural topography of the area coupled with the orientation of the access ramp and the lack of an interim Condell Road crossing point is unlikely to promote this route as a viable alternative.

Importantly, the walkway will not be altered from its current plan alignment nor will it be any less visible than in its existing condition meaning that a high level of passive surveillance will be maintained by virtue of the Condell Road and the proposed new development beyond. This in its own right will act as a deterrent to the potential for anti-social behavioural activities thereon.

Response 7.0 - Environmental Issue (Flooding):

The development site is part of an overall Local Authority owned landholding located west of the Condell Road and stretching from the river Shannon northwards toward the Clonmacken Roundabout. The subject development proposal pertains to the upper part of these lands (closest to the Clonmacken Roundabout) which are not subject to flood risk. While recent CFRAMs mapping updates have locally redefined the area subject to flood risk, a site specific Flood Risk Assessment has been prepared and submitted as part of the Part 8 application documentation.

The Flood Risk Assessment has defined, on a predictive basis, the extent of Local Authority owned lands that are subject to flood risk. The Flood Risk Assessment further sets out a recommended minimum floor level below which, vulnerable land uses such as housing, should not be considered. Careful consideration has been given to the layout design of the scheme to ensure that each housing unit and access / egress routes there to and from are not compromised by a worst case flood event.

While there is a significant quantum of Local Authority-owned land falling within the predicted flood risk zone, only part of the development specific component of public open space provision falls within the established flood risk zone.

Response 8.0 - Environmental Issue (Noise):

The development site's proximity to the R527 Condell Road necessitates consideration of noise mitigating measures to ensure that appropriate acoustic conditions suitable for habitation purposes are achieved as part of the development.

While a 20m set-back has been observed, the development layout has specifically been designed utilising the mass of the proposed building form to shield the developments compliment of private open space from the predominant noise source - the Condell Road. Living accommodation at ground level seeks to incorporate dual aspect rooms to facilitate natural ventilation via the quieter facades of the development. Background ventilation requirements within noise-source facing rooms can also be provided via the quieter facades of the development.

Considering the Local Authority's DRAFT Noise Action Plan, specialist Acoustic consultancy services have been engaged to complete a noise assessment in accordance with the Professional Planning Guidance (ProPG): Guidance on Planning and Noise - Residential Developments.

As part of a noise assessment, detailed noise modelling was carried out to establish the predicted noise levels at the front façades of the residential units and within the associated amenity areas. This was verified by site specific noise survey information recorded at various intervals. The noise assessment classifies the development proposal as being subject to noise risks ranging from 'negligible' levels on sheltered facades to 'medium' levels on more exposed facades. The noise assessment found that the majority of residents will have access to a quiet external area and that the majority of habitable rooms will achieve a good internal noise environment with open windows. However, it will be necessary to enhance the acoustic performance of the building fabric (windows primarily) in those more exposed conditions to ensure a good internal noise environment when windows are in the closed position.

Response 9.0 - Environmental Issue (Japanese Knotweed):

There are a number of identified Japanese Knotweed infestations in the environs of the proposed development site along the verges of the R527 Condell Road. Japanese Knotweed is an invasive, perennial weed producing tall canes that can grow to heights of 3m from a dense crown. Beneath the crown can exist an extensive network of underground stems called 'Rhizomes'. Rhizomes, which equally produce thread like roots, have been known to extend laterally for distances of up to 7m from a parent plant and to depths of 2m depending upon soil type. They can be found at deeper levels depending upon how they were initially deposited at the site.

Japanese Knotweed has a high regenerative potential with spread being stimulated by disturbance. Rhizomes can lay dormant in the ground for 20 years and regenerate when disturbed. Japanese Knotweed is a resilient weed both difficult and costly to eradicate. Herbicide treatment programmes typically extend between two and five years. Consequently, preventing spread is of critical importance.

In accordance with the Environmental Agency code of practice - 'Managing Japanese Knotweed on Development Sites', acceptable practices can be implemented to facilitate progression of development on sites infested with Japanese Knotweed. In the first instance, a site specific Japanese Knotweed Management Plan should be established to determine an appropriate strategy for prevention of rhizome spread. It is preferable not to excavate Japanese Knotweed rhizomes however it is feasible when necessary.

On site treatment is promoted in order to reduce the risk of spread beyond the infestation areas. Precautionary measures are needed through any extraction process to ensure that all rhizomes are contained. Displaced soil also needs to be carefully contained. Stringent housekeeping controls are required to define methodologies for entering, leaving and working within established areas of infestation. Suitable root barrier membranes (vertical and horizontal) can be installed around areas of infestation to isolate and prevent spread of rhizomes and contain any potentially contaminated soil.