

Submission – Draft Clonmel & Environs Local Area Plan 2024-2030

In relation to the draft of the Clonmel & Environs local area plan 2024-2030, it was disappointing if not un-surprising to see that ours and other submissions on the issues papers back in November/December 2022 in relation to the provision of single housing in the countryside in areas under urban influence based on a social need, were ignored during the drafting of this plan. Sadly, further confirmation that the developers of this plan do not seem to understand the consequence that this will drive local families such as ourselves out of the Clonmel area for another 6 years and most likely indefinitely. Last November, having attended the drop-in public information session in relation to the Clonmel Local Area Plan 2024-2030 on Wednesday 23rd November 2022 at the Clonmel Library, my wife and I felt compelled to make a submission on the issues papers due to some grave concerns we had following a conversation with the representative planner we met on the night in relation to this topic.

I, Robert Hannon, and my wife Ciara Hannon have had planning permission rejected on a site at [REDACTED] in the Clonmel Environs area [REDACTED] back in 2020. At the time the rejection reason was stated as being per the current Clonmel LAP – 6.10 Individual houses in the environs – In the Clonmel and Environs plan 2013, the environs constitutes lands zones as a pressure area for development and the purpose of this land was to allow for the continuation of rural/agricultural practices but also to safeguard the land for the future expansion of Clonmel. Policy HSG 10 – ‘individual houses in the environs’ made no provision for a ‘social need’ from potential applicants. An oversight from the planning authorities that has been hugely costly to a significant number of people and young families in the area, who have been restricted from building houses on their family land in areas where they grew up and have lived for their entire lives.

Having initially read the description of a Local Area Plan on the Tipperary County Councils own website back in November 2022, it was encouraging to be re-affirmed that ‘A Local Area Plan is a policy document adopted by a local authority in order to guide the spatial development of a town or place. These policy documents sit at the 'local' tier of planning policy, below the National Planning Framework 2018, the Southern Regional Spatial and Economic Strategy 2020 and the Tipperary County Development Plan 2022-2028. In reading this description of a local area plan as described by the Tipperary County Council, it would seem logical that the revised Clonmel local area plan will align with all of the documents detailed above in facilitating the provision of single housing in the countryside based on the core consideration of demonstrable economic **or social** need to live in a rural area.

Over the last number of years it has been encouraging to see the prevalence of common sense and logic in recent revisions of the National Planning Framework project Ireland 2040, the Southern Regional Spatial and Economic Strategy 2020 and also the new Tipperary County plan 2022 in relation to this policy. All of the above governing documents detail the intent to facilitate the provision of single housing in the countryside, as stated clearly in the following document sections:

1. The National Planning Framework project Ireland 2040, national policy objective 19, outlines the distinction between the development of rural housing in areas under urban influence, versus development of rural housing elsewhere. The National Planning Framework NPO19 states that ‘in rural areas under urban influence, the plan will facilitate the provision of single housing in the countryside based on the core

consideration of demonstrable economic **or social** need to live in the rural area’. The framework details how ‘it is important to differentiate, on the one hand, between rural areas located within the commuter catchment of the five cities and **our largest towns** and centres of employment and, on the other hand, rural areas located outside these catchments. But that it will continue to be necessary to demonstrate a functional economic **or social requirement** for housing need in areas under urban influence, i.e., the commuter catchment of cities and large towns and centres of employment. This will also be subject to siting and design considerations. For further guidance and clarity, the National Framework Document details that in the context of this statement it describes large towns and employment centres as towns with a population of more than 10,000 people or more than 2,500 jobs, with Clonmel listed as one of these towns in Appendix 2.

2. In the Southern Regional Spatial and Economic Strategy 2020, where RPO 27 b details that the plans will ‘Have regard for the viability of smaller towns and rural settlements. Core Strategies shall identify areas under urban influence and set the appropriate sustainable rural housing policy response which facilitates the provision of single housing in the countryside based on the core consideration of demonstrable economic, **social** or local exceptional need to live in a rural area and siting, environmental and design criteria for rural housing in statutory guidelines and plans’
3. Within the Tipperary County development plan 2022-2028 section 5.5, the plan details how the NPF and ‘Our Rural Future’, Ireland’s Rural Development Policy 2021-2025’, (DRCD, 2021) support the need to plan for sustainable communities and strengthen our rural communities. This will be achieved through attracting new residents to live in rural settlements, to encourage and promote the reuse of vacant homes and to make provision for housing in the countryside for those who demonstrate a need to live in our rural areas. The plan further details that in ‘Areas under Urban Influence’, it will facilitate the provision of single housing in the countryside based on the core consideration of demonstrable ‘economic **or social**’ need to live in a rural area.

Summary of policies:

	Document Title	Provision for single house in the countryside based on a social need	Summary of policy
1	National Planning Framework project Ireland 2040	YES – NPO 19	Provision for single houses in the countryside in areas under urban influence based on a <u>social</u> need.
2	Southern Regional Spatial and Economic Strategy 2020	YES - RPO 27 b	For areas under urban influence, the appropriate sustainable rural housing policy response which facilitates the provision of single housing in the countryside based on the core consideration of demonstrable economic, <u>social</u> or local exceptional need.
3	Tipperary county development plan 2022-2028	YES - section 5-11	The plan further details that in ‘Areas under Urban Influence’, it will facilitate the provision of single housing in the countryside based on the core consideration of demonstrable ‘economic <u>or social</u> ’ need to live in a rural area.
4	Clonmel LAP 2024-2030	NO - Section 5.2.4 – policy 5.3	‘Support new dwellings on lands zoned for ‘Town Environs’ where the applicant meets an ‘Economic Need’ (see TCDP Table 5.3 and Planning Policy 5 – 11), and there is no availability of alternative sites. An existing and/or shared domestic dwelling entrance of the applicant’s family dwelling

			<p>should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access' –</p> <p>The exclusion of a 'Social need' is completely at odds with all other policies. There needs to be an allowance in here for people with a social need to build in areas under urban influence and the same criteria as detailed in the Tipperary County Development plan (section 5.5 & 5.6) should be used.</p>
--	--	--	--

The logical arguments that we detailed in our last submission are all still absolutely valid. Yet section 5.2.4 of the draft Clonmel plan has gone in the opposite direction, making it further mis-aligned with the National Planning Framework project Ireland 2040, the Southern Regional Spatial and Economic Strategy 2020 and also the new Tipperary County plan 2022. The contents of this draft mean that it will be even more difficult in the future for anybody to build in the Clonmel environs, stating that it will be possible in 'exceptional circumstances, with consideration on a case by case basis'. We do not agree that the alternative to what is suggested in the draft LAP, would be the haphazard development of one-off housing which would impact negatively on future use of lands. There are a significant number of scenario's where one-off housing can be effectively developed in the environs with absolutely no negative impact to the future expansion of Clonmel. A case study that validates this point is our own planning application [REDACTED] back in 2020, which would have made use of a site in the environs that will clearly NEVER be of use for the expansion of Clonmel as depicted in figure 1 below. The plot is vacant and growing weeds, when it could be put to use as a much-needed house in the Clonmel area. Every individual planning application is still going to be subjected to rigorous scrutiny throughout the application process.



Figure 1: The Clonmel map to highlight the proposed house location per [REDACTED]

We strongly believe that the site where we attempted to get planning permission [REDACTED], is in an area which should be defined as a 'rural area under urban influence'. The site is located within the area currently zoned as Clonmel Environs on the draft map. As per the Clonmel draft LAP 9.0 Land Use Zoning Framework, the Clonmel Town Environs is defined as a **rural area**: "To provide for agricultural needs and to protect and enhance the **rural environment** and setting of the settlement". We agree with this designation by the Clonmel draft LAP that the

Environs is a rural area because there is no infrastructure for walking/cycling or any public transport from the site in question in application [REDACTED], to be able to commute to the Clonmel town centre by these means. It therefore seems logical that it is defined as a rural area under urban influence.

If this is not a rural area under urban influence, then we are at a loss as to what it would be designated as.

As per NPO National Policy Objective 19: “ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. **within the commuter catchment of cities and large towns** and centres of employment, and elsewhere. In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or **social need** to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements”.

We have seen this same language used in policies in the Southern Regional Spatial and Economic Strategy 2020 & Tipperary County Development plan 2022-2028 with regard to allowing one-off housing in the countryside in rural areas under urban influence if you meet the criteria for a social need, as detailed already in this document.

We understand that one of the reasons for the lands zoned Environs is to protect lands for the future expansion of Clonmel. While we believe that this draft LAP is fundamentally planning for more growth than is realistic for the town of Clonmel, we also believe that there are solutions available that allow for a small number of houses to be planned and constructed that would achieve the intention of a social need, in that it would allow local people to build on their lands, but would also ensure that future expansion of the Clonmel town would not be impacted by haphazard development. To achieve this we would propose to amend policy 5.3 and other relevant sections such as 5.2.4 as necessary to a version of the below:

Policy 5.3: Support new dwellings on lands zoned for ‘Town Environs’ where the applicant meets;

Category 1: An ‘Economic Need’, (see TCDP Table 5.3 and Planning Policy 5 – 11), and there is no availability of alternative sites. An existing and/or shared domestic dwelling entrance of the applicant’s family dwelling should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access.

And/Or:

Category 2: ‘Social Need’; The applicant must demonstrate a social need to reside in the local rural area for social purposes in line with Table 5.3 (Tipperary County Development Plan).

And all the criteria set out below is met:

The applicant must be a direct descendent of the long term landowner, and the proposed site has been in the ownership of the immediate family for a minimum of 10 years.

And

The applicant must have resided within 10km of the site where they intend to build for a substantial period of their lives (10 years).

And

The site is Gap site/Infill site

And

The applicant does not, or has never owned a house in the open countryside. (see TCDP Table 5.3 and Planning Policy 5 – 11), and there is no availability of alternative sites. An existing and/or shared domestic dwelling entrance of the applicant’s family dwelling should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access.

In summary, we are of the belief that a well-defined and stringent policy regarding the social need for one-off housing in the rural environs of Clonmel will allow for a small number of families like ourselves, who are long term land owners and Clonmel residents, in our case since [REDACTED], to have the opportunity to build our own family home beside [REDACTED]. We believe that a policy like the above will make constructive use of infill and gap-sites that are otherwise lying vacant, which promotes sustainable development. This can be achieved without causing any disruption to the future expansion of the town as these sites are located between existing dwelling houses are not fit for scaled housing or industrial development efforts. It allows for local people to continue to live in their home area without having to leave Clonmel, but blocks people from building on these lands who would be relocating to the area, thereby ensuring that this will be a limited number of cases, for well-warranted applicants. It also ensures that the Clonmel LAP aligns with the direction set out by the National Planning Framework project Ireland 2040, the Southern Regional Spatial and Economic Strategy 2020 and also the new Tipperary County plan 2022 in relation to the provision for single houses in the countryside in areas under urban influence.

It is also not clear to us why the Clonmel environs is zoned to be so enormous, which accentuates the problem caused by effectively blocking the majority of residential development on the lands. While we understand that Clonmel is a key town in Tipperary, when compared with the other two key towns of Nenagh and Thurles there seems to be massive disparity between the area designated as environs. This can be seen in the proposed maps below for each of the key towns for which LAPs are currently being developed. It is our proposal that the environs of Clonmel should be reduced to align with these other key towns and be more indicative of an optimistic but realistic growth projection. Per section 5.2 of the LAP draft, it states that in the direction of North of the N24 Bypass, in terms of active travel, the alignment and nature of the N24 bypass along with the topography of the area, rising steeply north out of the town, has created car-dependency in terms of getting to and from town centre, creating a disincentive to walking and cycling. Given that this is not a preferred destination for future development then it would be logical to reduce the zoned environs in this direction, and we propose Chawke’s filling station as a more logical northern boundary to the environs.

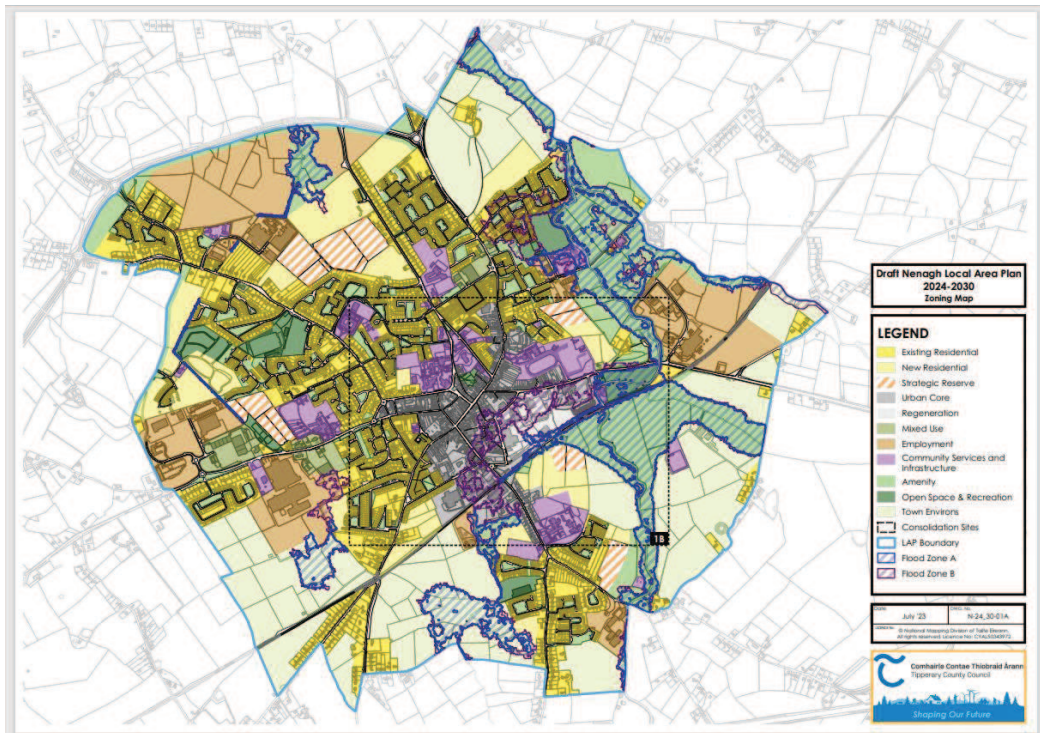


Figure 2: Nenagh map per Draft Nenagh Local Area Plan 2024-2030

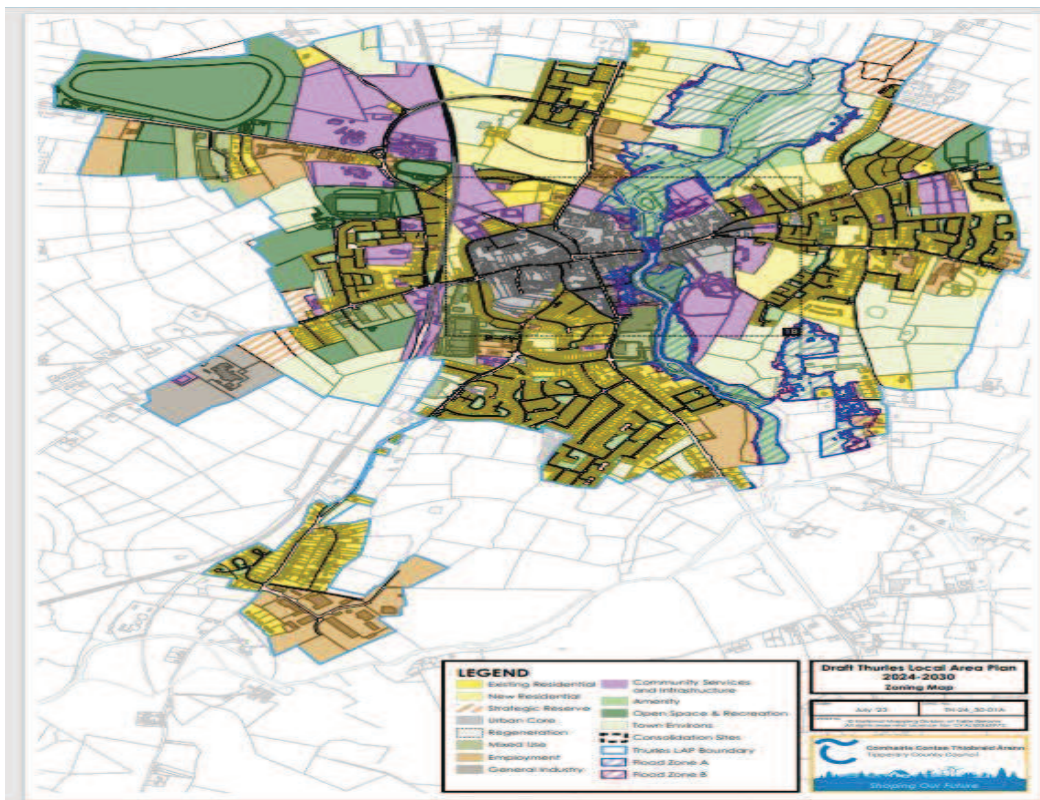


Figure 3: Thurles map per draft Thurles local area plan 2024-2030

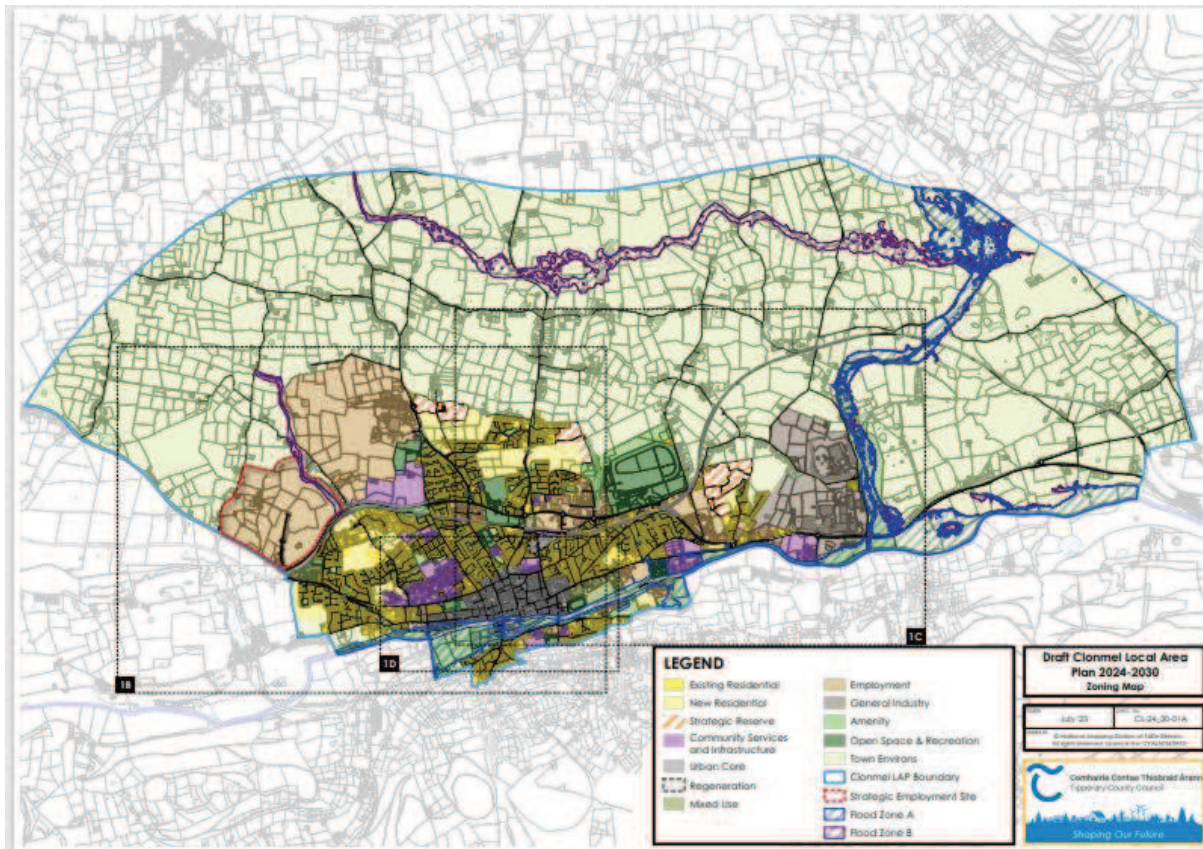


Figure 4: Clonmel map per draft Clonmel local area plan 2024-2030

The draft Clonmel plan makes numerous references back to the Tipperary County Development plan (TCDP) and yet is happy to blatantly ignore a key recommendation from the document, which states that in ‘Areas under Urban Influence’, it will facilitate the provision of single housing in the countryside based on the core consideration of demonstrable ‘economic or social’ need to live in a rural area. The draft Clonmel plan makes reference to how the TCDP Chapter 2 Core Strategy, underpinning Southern RSES RPO 17, identifies Clonmel as a ‘Key Town’ and ‘Self-Sustaining Regional Driver’ with a unique strategy for the growth of Clonmel. In the same chapter of the TCDP, section 2.5.3 Population Growth and Distribution acknowledges the importance of compact development, with the Core Strategy requiring at least 30% of all new homes that are targeted in settlements, to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact, and reduce unsustainable urban sprawl and ribbon development. There is a big difference between the intent of this statement and allowing close to 0% of development to happen in areas under urban influence, as seems to be the intent of the draft plan.

My wife and I wrote the initial submission back in November 2022 at a time when this restrictive policy HSG10 within the Clonmel and Environs plan 2013, had already cost my wife and I a two-and-a-half-year delay in gaining planning permission. In the best case scenario, we knew that it would continue to do so for well over another year at a huge financial personal cost. All of this at a time when we are trying to raise our [REDACTED] and make impossible decisions on how to gain ownership of a home, driven by the uncertainty that surrounds what direction a future Clonmel local area plan will follow. [REDACTED]

[REDACTED]. A mass-exodus of private landlords from the market which is about to worsen the rental crisis in Clonmel. This has led us to being active on the renters market once again which has given us a scary insight into the completely inadequate housing infrastructure currently available in Clonmel. On many of the days that we have checked daft.ie in desperation, there have been ZERO properties available to rent in the town. A scarcely believable situation for a designated 'Key Town', that has been created and worsened by policies included in plans such as proposed in this draft.

As a member of the site-leadership team in [REDACTED], I have experienced first hand the damage to local enterprise growth caused by lack of housing in the Clonmel area. I was not surprised on July 10th 2022 to receive an e-mail from [REDACTED] containing a survey, with an explanation that 'this assessment is being carried out with major employers in the Clonmel area to gather data and information on employee commuting as well as employee interest in rental accommodation in the Clonmel area. It is understood that the rental market in Clonmel is difficult in terms of availability and pricing'. To say that the rental market is difficult in Clonmel is a massive understatement, it is non-existent. I have had individuals with unique skillsets, some hired from outside of Ireland, refuse a role based on the lack of available housing in Clonmel. This is little short of embarrassing for a global organisation like [REDACTED], and obstacles like this will impact the organisation's ability for future growth without doubt. Any policy changes that will create additional housing opportunities will be helpful. Allowing local people to build houses on their own family land will free up rental properties with near immediate impact and at no cost to the tax payer.

We continue to live in diminishing hope that despite the contents of the draft LAP, that when it does eventually get to the adoption stage that it will align with the National Planning Framework project Ireland 2040, the Southern Regional Spatial and Economic Strategy 2020 and also the new Tipperary County plan 2022 in relation to the policy to facilitate the provision of single housing in the countryside based on a social need. We have proposed policy wording in this document which will allow for a social need when other strict and warranted criteria have been met, that will ensure that the future growth of Clonmel town will not be impacted by any dwelling granted as a result of this amendment. We also strongly believe that the environs boundary should be drastically reduced to align with a more realistic growth projection for Clonmel. My wife and I are both employed in the local Clonmel area and would like to be able to continue to live in the area where my wife grew up. We would like for our son [REDACTED] to grow up beside his grandparents, attend the same primary school as I, Ciara did in Powerstown N.S. and become a member of the community neighbourhood I grew up in. Through the process of this saga over the last number of years we have come to be in contact with numerous other families in the same situation as ourselves. The authors of this plan need to be aware that this draft plan if adopted will drive local families out of the Clonmel area, if they are unwilling to amend the contents of this draft plan in relation to sections 5.2.4 and policy 5.3.

Robert & Ciara Hannon
[REDACTED]