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

In relation to the draft Clonmel & Environs Local Area Plan 2024 - 2030, currently on public display, I wish to highlight my serious concerns around section 5.2.4 "One-off Housing in the Town & Environs." Policy currently being proposed is extremely restrictive and furthermore, inconsistent with our recently adopted County Development Plan.

Section 5.5 of our County Development Plan is very clear and as follows,

5.5 Residential Development in the Open Countryside 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.

TIPPERARY COUNTY DEVELOPMENT PLAN 2022 - 2028 VOLUME 1 89 5.5.1 Rural Area Designations  
The Core Strategy makes distinction between rural 'Areas under Urban Influence' and the areas outside of these or 'Open Countryside' as part of its overall approach to strengthening rural fabric and communities and protection of the environment. The approach outlined below will apply: \* In '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, environmental and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;

Why therefore is the proposal in the draft only permitting a single one off house on "economic need." In other words, a person who is actively engaged in farming/agricultural activity on the landholding on which the house is to be built, meeting either of the following: (a) A farmer of the land - defined as a landowner with a holding of >20ha. Or (b) An owner and operator of a farming/horticultural/forestry/bloodstock activity on an area less than 20ha, who is engaged in farming activity on a daily basis, where it is demonstrated that the farming/agricultural activity forms a significant part of their livelihood.

Over the lifetime of the existing Clonmel & Environs Development Plan I've seen first-hand the devastating impact that this restrictive policy has had on young families, as examples note the following planning references, [REDACTED] & [REDACTED], also pre planning reference [REDACTED]. This devastating impact is likely to continue when you have regard to the likely lack of commencements over the coming years. In terms of those developments already or about to commence, in all cases the Local Authority has purchased the majority if not all the properties. The serious delay in commencements, likely to continue, is now affecting local employment. This is the message coming

loud and clear from major employers like Boston Scientific and Abbot Vascular, I have met with families who have access to family plots whose only option over the last 10 years has been to rent, their children growing up in a house they cannot call their own. For some families the only option is to purchase a house outside of the Clonmel Borough District, I can point to two examples of young Clonmel couples who have recently purchased in the new development in Cashel and are now commuting to Clonmel every day. Another young family who recently started their own business in Clonmel purchased a house in Carrick, unable to build on a family site, they simply could not wait any longer, they wanted a house they could call their own.

Please note the following recommendations which should be included when formulating the new Clonmel Area Plan, all of which 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. 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'.
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. In a country with an ageing population, it would seem imperative that this loc

I am therefore calling for the draft to be consistent with our County Development Plan, that in lands zoned "Town Environs," single houses will be permitted on both economic and social need.

In particular, there needs to be a relaxation of the current proposal to confine rural housing to those engaged on agricultural activity. As started above, there are some cases where there is a genuine social or economic need for a family member to reside on the family landholding. While this landholding may be modest, even small in size, it can be sufficiently large to accommodate a second dwelling. Examples will be a son or daughter of a long-established family in the area, who needs to reside close to his/her parents to meet a social or medical need. Other examples will include a family member who works locally (in a rural-based employment) and desires and needs to live on the family landholding. I acknowledge that any application for permission to build a house will be subject to the usual planning considerations, such as house design, access arrangements and sight distance, water supply and sewage disposal, etc.

I hope that you will consider my submission.

Regards, FG Group – Clonmel Borough District