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A new Submission has been received to the Draft Clonmel Local Area Plan 2024-2030

Submission ID: CLAP-63

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County: [Redacted]

Submission Text: DOWNEY, Chartered Town Planners, [Redacted] have prepared this submission to the Draft Clonmel and Environs Local Area Plan 2024 - 2030. This submission is made on behalf of our clients, [Redacted] in relation to lands zoned 'TE' – Town Environs.

This submission relates to the restrictions of the rural housing policies and objectives of the Draft Clonmel Local Area Plan 2024 - 2030 (draft stage), with particular reference to 'TE – Town Environs' zoned lands, and housing provision restricted to those solely with an economic need via agriculture under section 5.2.4 of the Draft Plan.

This is to ensure that in circumstances where there is a "demonstratable economic or social need to live in the rural area" that this can be facilitated under the Clonmel Local Area Plan 2024 - 2030, in line with both national and regional policies for the County, and Tipperary County Development Plan 2022 – 2028.

Please refer to our detailed submission (attached) for full details.

[Redacted]

[Redacted]

[Redacted]

DCWNEY

**DRAFT LOCAL AREA PLAN
SUBMISSION**

**DRAFT CLONMEL AND ENVIRONS LOCAL AREA
PLAN 2024-2030
(STAGE II CONSULTATION)**

**Proposal: Revision of Section 5.2.4 to include for a
Demonstration of both an 'Economic' or 'Social' need for
Rural Housing / One-Off Housing on Rural Lands under
Urban Influence**

Clients: [REDACTED]

September 2023



Comhairle Contae Thiobraid Árann
Tipperary County Council

Draft Clonmel and Environs Local Area Plan 2024-2030

July 2023

EXECUTIVE SUMMARY

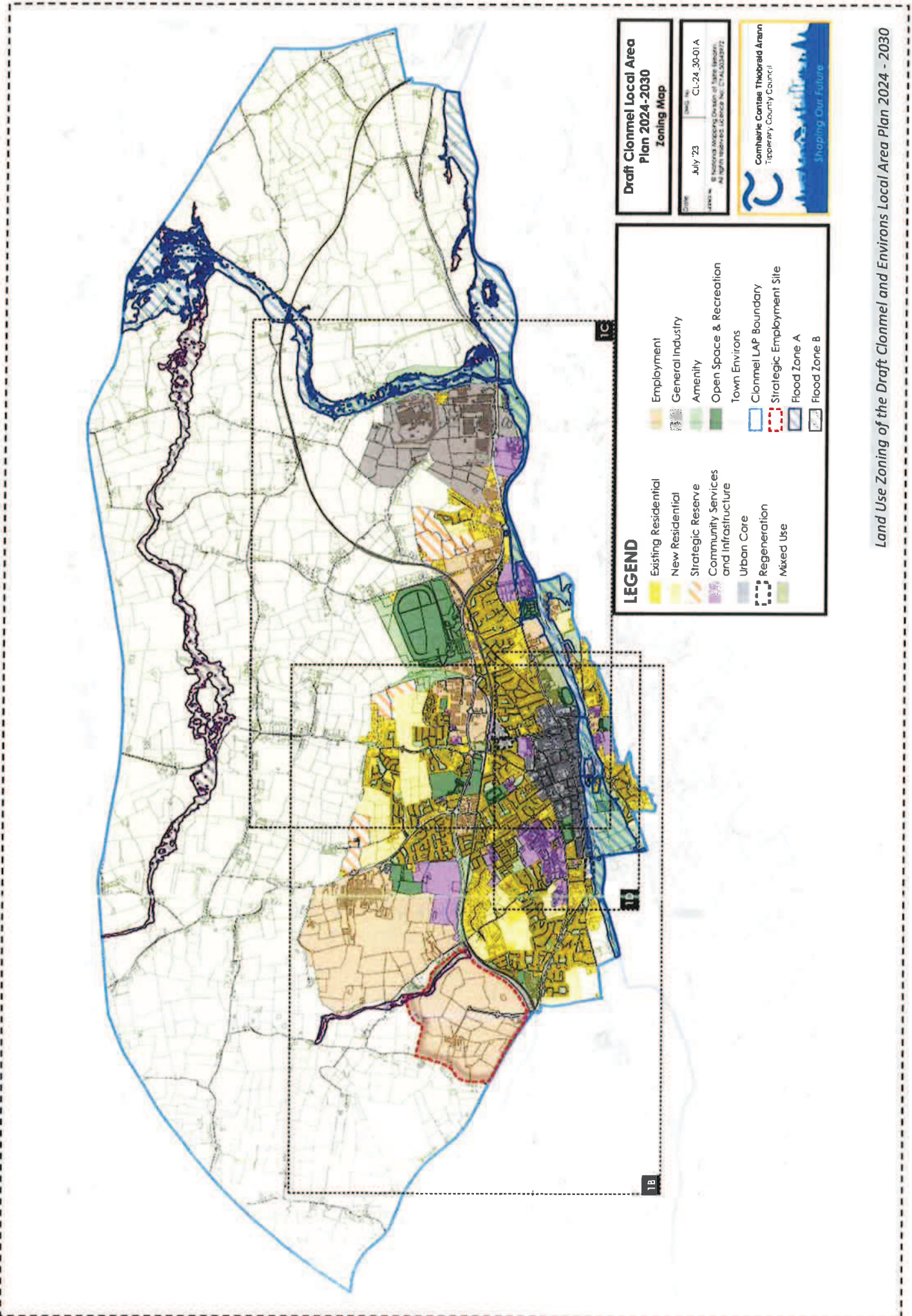
This submission is made by DOWNEY, [REDACTED] on behalf of our clients, [REDACTED] and is submitted to Tipperary County Council in the context of the Draft Clonmel and Environs Local Area Plan 2024-2030, which is currently on public call for submissions.

The Draft Clonmel and Environs Local Area Plan 2024 - 2030 introduces the requirements for rural housing development in the open countryside on lands zoned 'TE – Town Environs' which only allows for an economic demonstration of a rural housing need via agricultural. We would argue that this policy is overly restrictive and is not in accordance with National, Regional and Local planning documents.

It is respectfully submitted that for the reasons set out in the following, that Section 5.2.4 should be revised:

- It is inconsistent with National and Regional Planning policy regarding demonstrating an economic or social rural housing need;
- It is inconsistent with Policy 5 – 11 of the Tipperary County Development Plan 2022 – 2028 in allowing for a demonstration of an economic or social need for housing within areas under urban influence;
- The policy is too restrictive in only permitting one-off housing through an economic need. This discourages people from residing in the environments of Clonmel which they may have an extended family history and ties to the area; or need to take care of family for medical related reasons.
- Addition of Demonstration of a 'Social' need will Create Vibrant Communities.

We ask Tipperary County Council to take the contents of our submission into consideration and revise the wording of Section 5.2.4 to include for a social need of a rural housing need on lands zoned 'TE – Town Environs' as an alternative alongside an economic need which in its present form is overly restrictive.



**Draft Clonmel Local Area
Plan 2024-2030
Zoning Map**

Date: July '23
Drawing No: CL-24_30-01A
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LEGEND

Existing Residential	Employment
New Residential	General Industry
Strategic Reserve	Amenity
Community Services and Infrastructure	Open Space & Recreation
Urban Core	Town Environs
Regeneration	Clonmel LAP Boundary
Mixed Use	Strategic Employment Site
	Flood Zone A
	Flood Zone B

TABLE OF CONTENTS

1.0	INTRODUCTION	5
2.0	LEGISLATIVE BASIS	5
3.0	PLANNING CONTEXT	5
3.1	National Planning Framework.....	6
3.2	Sustainable Rural Housing Guidelines for Planning Authorities (2005).....	7
3.3	Regional Spatial and Economic Strategy.....	8
3.4	Tipperary County Development Plan 2022 – 2028.....	9
3.5	Clonmel and Environs Development Plan 2013.....	12
4.0	DRAFT CLONMEL AND ENVIRONS LOCAL AREA PLAN 2024-2030.....	12
5.0	 GROUNDS OF SUBMISSION	14
5.1	Inconsistent with National and Regional Planning Policy.....	14
5.2	Inconsistent with Tipperary County Development Plan 2022 – 2028.....	15
5.3	Overly Restrictive Policy.....	15
5.4	Addition of Demonstration of a ‘Social’ need will Create Vibrant Communities.....	16
6.0	 CONCLUSION	16

This planning submission is made in response to the statutory review of the Draft Clonmel and Environs Local Area Plan 2024 - 2030. Stage 2, known as the ‘Draft’ stage, requires submissions to be of a specific nature. Accordingly, this submission has been prepared in the context of “Clonmel Local Area Plan” which sets out the vision for how Clonmel should develop over the life of the Plan while ensuring compliance with national, regional, and local policy. The Local Area Plan aims to establish a location for high-end outlines opportunities to shape future development by establishing a location for high-end, high-quality value-added businesses, blending sustainable urban design and architecture with nature to create a distinct, enjoyable sense of place. We would therefore respectfully request that Tipperary County Council consider the content within this planning submission. DOWNEY would like to thank the Council for the opportunity to make this submission, on behalf of our client.

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Prepared by	S.S.	05/09/2023	V_01_DRAFT
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1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, [REDACTED] have prepared this submission to the Draft Clonmel and Environs Local Area Plan 2024 - 2030. This submission is made on behalf of our clients, [REDACTED] in relation to lands zoned 'TE' – Town Environs.

This submission relates to the restrictions of the rural housing policies and objectives of the Draft Clonmel Local Area Plan 2024 - 2030 (draft stage), with particular reference to 'TE – Town Environs' zoned lands, and housing provision restricted to those solely with an economic need via agriculture under section 5.2.4 of the Draft Plan.

This is to ensure that in circumstances where there is a "*demonstratable economic or social need to live in the rural area*" that this can be facilitated under the Clonmel Local Area Plan 2024 - 2030, in line with both national and regional policies for the County, and Tipperary County Development Plan 2022 – 2028.

This written submission is made in response to an invitation for comments from interested parties by Tipperary County Council. This submission is being made within the specified timeframe for submissions i.e., 11th September 2023, as set out on the Tipperary County Council's website.

2.0 LEGISLATIVE BASIS

Chapter II, Section 18 of the Planning and Development Act, 2000 (as amended) provides that Planning Authority may, at any time, prepare a LAP for any particular area within its jurisdiction which the Planning Authority considers appropriate; in particular for areas which require economic, physical, and social renewal, and for areas likely to be subject to large scale development. The application and content of a Local Area Plan are set out within Section 19 of the Planning and Development Act, 2000 (as amended), whereby a local area plan may be prepared in respect of any area, including a Gaeltacht area, or an existing suburb of an urban area, which the planning authority considers suitable and, in particular, for those areas which require economic, physical and social renewal and for areas likely to be subject to large scale development within the lifetime of the plan.

The process for the consultation and adoption of a Local Area Plan is contained within Section 20 of the Planning and Development Act, 2000 (as amended), which states:

"20 (1) - A planning authority shall take whatever steps it considers necessary to consult the public before preparing, amending or revoking a local area plan including consultations with any local residents, public sector agencies, non-governmental agencies, local community groups and commercial and business interests within the area."

3.0 PLANNING CONTEXT

This section will now set out the planning context regarding guidelines elaborating on the policies and objectives found at national level and re-iterate the need to accommodate a spectrum of persons in providing a home in rural areas through demonstrating an economic or social need for housing on lands under urban influence.

3.1 National Planning Framework

The National Planning Framework (NPF) is *“the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between.

The NPF empowers each region to lead in the planning and development of their communities, containing a set of national objectives and key principles from which more detailed and refined plans are to be prepared. It sets out 10 key objectives:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A Strong Economy supported by Enterprise,
6. Innovation and Skills; High-Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and,
10. Access to Quality Childcare, Education and Health Services.

Chapter 5 of the NPF deals with the area of rural development and seeks to provide a stronger rural area, supported by sustainable growth, including facilitating new housing in the countryside. In this regard, National Policy Objective 19 seeks to:

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;
- In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

The National Planning Framework and Objective 19, clearly set out the intended spirit for the development of rural housing in the countryside at a national level. Policy Objective 19 highlights the need to facilitate single housing in the countryside where there is a demonstrable economic or **social need** to live in the rural area, this includes in areas under urban influence. The National Planning Framework would have restricted such single housing to an economic need only, if that was intended. However, that was clearly not the case and thus the social need element was included and should be included in the regional and local plans that must be consistent with the NPF.

It is important to note, in the context of the Tipperary County Development Plan 2022-2028, that both economic and social needs must be accounted for and clear direction on framing these needs for the purpose of informing planning applications must be clearly set out within the Local Area Plan. Economic needs can include farming, forestry and other land use-based activities and social needs can also cover a broad spectrum of needs, including the need to remain in the area that person has spent a substantial period of their lives, this will be shown in further detail below.

3.2 Sustainable Rural Housing Guidelines for Planning Authorities (2005)

The Sustainable Rural Housing guidelines expand on the rural policy framework in the National Spatial Strategy and provide that:

“People who are part of the rural community should be facilitated by the planning system in all rural areas, including those under strong urban-based pressures.”

The guidelines identify a key question for planning authorities, particularly those with extensive areas under major urban influence, in how to define rural generated housing needs. The guidelines identify the types of persons who would constitute rural generated housing need:

1. **Persons who are intrinsic part of the rural community;**
2. **Persons working full-time or part time in rural areas.**

The guidelines outline the following:

1. Persons who are intrinsic part of the rural community:

“Such persons will normally have spent substantial periods of their lives, living in rural areas as members of the established rural community. Examples would include farmers, their sons and daughters and or any persons taking over the ownership and running of farms, as well as people who have lived most of their lives in rural areas and are building their first homes. Examples in this regard might include sons and daughters, of families living in rural areas who have grown up in rural areas and are perhaps seeking to build their first home near their family place of residence.

2. Persons working full-time or part-time in rural areas:

“Such circumstances will normally encompass persons involved in full-time farming, forestry, inland waterway or marine related occupations, as well as part time occupations where the predominant occupation is farming/natural resource related. Such circumstances could also encompass persons whose work is intrinsically linked to rural areas such as teachers in rural schools or other persons whose work predominantly takes place within rural areas”.

These guidelines elaborate on the policies and objectives found at national level and re-iterate the need to accommodate a spectrum of persons in providing a home in rural areas.

3.3 Regional Spatial and Economic Strategy

The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans (CCDP) and Local Enterprise and Community Plans (LECP) of the ten local authorities in the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. Clonmel has been identified as a Key Town.

The RSES has a framework based on the pillars, the regions three cities (Limerick, Cork & Waterford), supported by a network of strategically located Key Towns, towns and villages and rural areas. Key Towns are defined as “large population scale urban centre functioning as self-sustaining regional drivers” and “strategically located urban centres with accessibility and significant influence in a subregional context”. The Regions network of Key Towns strengthens the urban structure across our Region, align with NPO 7 of the NPF and are a complement to the three pillars of our cities and

metropolitan areas which are the primary drivers of population and employment growth in the Region.

3.4 Tipperary County Development Plan 2022 – 2028

Tipperary County Council have adopted the first all-county Tipperary Development Plan 2022 – 2028.

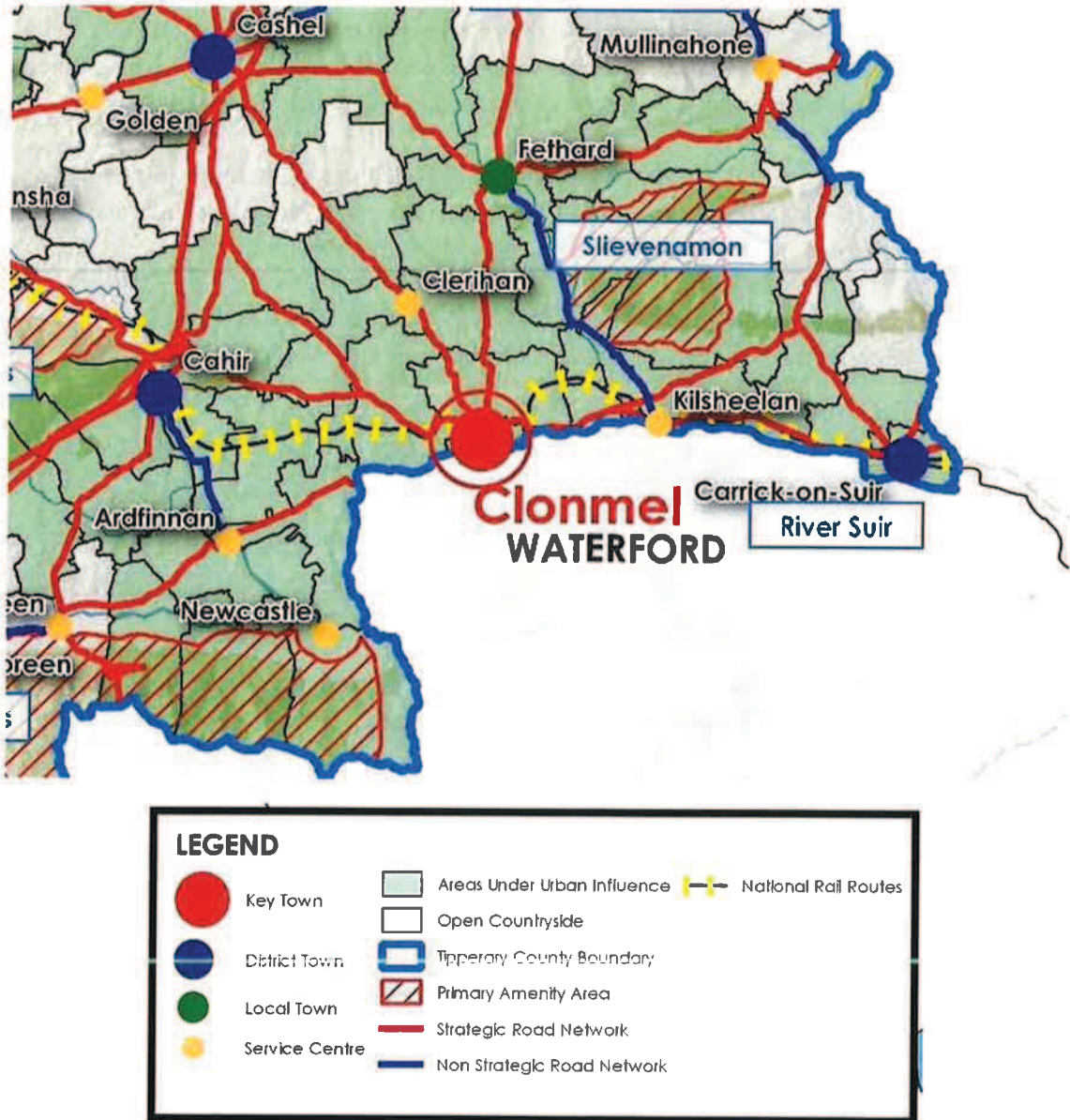


Figure 1: Extract from Tipperary County Development Plan 2022 – 2028 of regions under urban influence and open countryside

Regarding living in rural locations, Section 4.6.4 Open Countryside of the Tipperary County Development Plan 2022-2028, introduces Council policy for housing in the countryside outside of the settlement areas of towns and villages.

In line with the National Planning Framework's NPO19, the Core Strategy makes a 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, as per Section 5.5.1:

- 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.
- In 'Open Countryside', facilitate the provision of single housing in the countryside based on siting, environmental and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

Figure 5.3 of the Tipperary County Development Plan 2022-2028 identifies land distinctions across the county, the proposed Town Environs and its surrounding locality is classified as 'Areas under Urban Influence'.

The Planning Authority definition of 'Social' need in the context of rural housing policy, as set out within Table 5.3 of the County Development Plan is as follows;

"(a) A person who has resided in a rural area (as defined in Table 2.4 Chapter 2 Core Strategy):

(i) Within 5km of the site where they intend to build for a substantial period of their lives (10 Years) within a 'Primary Amenity Area',

(ii) Within 10km of the site where they intend to build, for a substantial period of their lives (10 Years) within an 'Area of Urban Influence'....

A person with a demonstrable housing need on the basis of exceptional medical circumstances. Any planning application must be supported by documentation from a registered medical practitioner and disability organisation, proving that a person requires to live in a particular environment, and in a dwelling designed and built purposely to suit their medical needs."

Policy 5 – 11 of the Tipperary County Development Plan sets out the provision of housing within the countryside, as outlined:

Policy 5 – 11: Facilitate proposals for dwellings in the countryside outside of settlements in accordance with NPF Policy NPO 19 for new Housing in the Open Countryside, and designations illustrated in Section 5.5.1, and Table 5.2: Rural Housing Technical Principles for Applicants.

In 'Areas Under Urban Influence' and 'Primary Amenity Areas', the Council will consider single houses for persons where the criteria set out in Category 1A or B, or Category 2 hereunder are met:

Category 1: 'Economic Need' A: The applicant must demonstrate an economic need to reside in the area through active employment in farming/agricultural activity (farming, horticulture, forestry, bloodstock). The farm must exceed 20ha in total. And all the criteria below is met:

- (i) The applicant must be actively engaged in farming,
- (ii) The applicant must demonstrate that they have been engaged in farming at that location for a continuous period of over 5 years prior to making the application,
- (iii) The applicant does not, or has never owned a house in the open countryside.

B: The applicant must demonstrate an economic need to reside in the area through active engagement in the running of a farming/horticultural/forestry/bloodstock activity on an area less than 20ha where it is demonstrated to form a significant part of the livelihood of the applicant who is engaged in farming activity on a daily basis, and/or where the farming/agricultural activity provides local employment. And all the criteria below is met:

- (i) The applicant is trained in good farming practice (or qualifies for an exemption from training), owns or occupies, works and maintains land for the purposes of achieving outputs, and demonstrate that they have been engaged in farming/agricultural activity at that location for a continuous period of over 5 years prior to making the application
- (ii) The applicant does not, or has never owned a house in the open countryside,
- (iii) A detailed 5-year business plan will be required to demonstrate 'compliance with Section (i).

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. And all the criteria set out below is met:

- (i) Within a 'Primary Amenity Area', the applicant must have resided within 5km of the site where they intend to build for a substantial period of their lives (10 years),
- (ii) (Within an 'Area of Urban Influence', 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
- (iii) The applicant does not or has never owned a house in the open countryside.

In 'Open Countryside' areas, the Council will consider single houses for persons where the development meets other relevant policies set out in the Plan, and where the proposed development is in accordance with all the criteria set out hereunder.

- (i) The proposed development must meet the normal planning and environmental criteria and development management standards,
- (ii) The applicant does not, or has never owned a house in the open countryside,

- (iii) To prohibit speculative development in these areas, any application for a single permanent dwelling must be made in the name of the person for whom it is intended. An occupancy condition will be attached to any grant of permission,
- (iv) An alternative site is not available within a settlement within 5km of the proposed site.

3.5 Clonmel and Environs Development Plan 2013

Section 6.10 of the Clonmel and Environs Development Plan 2013 outlines the policies and objectives for individual houses in the environs which are a 'pressure area' for development. The Plan seeks to maintain these areas for rural/agricultural practices and safeguard the future expansion of Clonmel Town. All rural housing applications in these areas must comply with Policy HSG 10, which essentially restricts all applications for one-off houses based on social need and focuses only on agricultural need.

Policy HSG10 only allows for the provision of single houses in rural areas under urban pressure for persons who comply with the economic criterion. The policy does not account for the social criterion as outlined in Policy Objective 19 of the National Framework Plan.

It is an objective of the Local Area Plan that the development of Clonmel and its environs follow development management guidelines including land use zoning objectives and designations. *"Policy DM 1: It is the policy of the Council to require all development to comply with the relevant standards identified in Section 9 Development Management Guidelines of the C & EDP."*

DOWNEY note that Policy HSG 10 is out of step with the National, Regional and County guidance on provision of houses within the countryside. Which state that rural housing *"should be facilitated by the planning system in all rural areas, including those under strong urban-based pressures"*. Broadly, it is the objective of National & Regional policy to support balanced regional development and underpin the sustainability of rural areas.

Policy HSG10 within the LAP restricts applications for one-off housing in rural areas to farmers of the land or direct descendants of a farmer. This is in conflict with the rural housing objectives of the Tipperary County Development Plan 2022-2028, which define 'Economic' and 'Social' housing need in rural areas.

It is respectfully submitted that the Clonmel & Environs 2013 was written pre-National Planning Framework 2040. Policy HSG10 is in conflict with the rural housing policy within the Tipperary County Development Plan 2022-2028.

4.0 DRAFT CLONMEL AND ENVIRONS LOCAL AREA PLAN 2024-2030

The Draft Clonmel Local Area Plan 2024 – 2030 is to provide the overarching land use strategy and development objectives for Clonmel and its Environs. It is to act as a framework for the proper planning and sustainable development of the area. It is to be consistent with national and regional level policies, with cognisance to the recently adopted Tipperary County Development Plan 2022 –

2028. The LAP, when it comes into effect, will replace the existing Clonmel and Environs Development Plan 2023 (as extended). The Draft LAP contains of the following series of documents:

- Clonmel Local Area Plan 2024 Written Statement
- Clonmel Maps
- Appendices labelled as the following;
 - (i) Serviced Land Assessment
 - (ii) Draft Local Transport Plan
 - (iii) Regeneration Sites
 - (iv) Strategic Environmental Assessment Environmental Report & Non-Technical Summary
 - (v) Appropriate Assessment Natura Impact Statement
 - (vi) Strategic Flood Risk Assessment

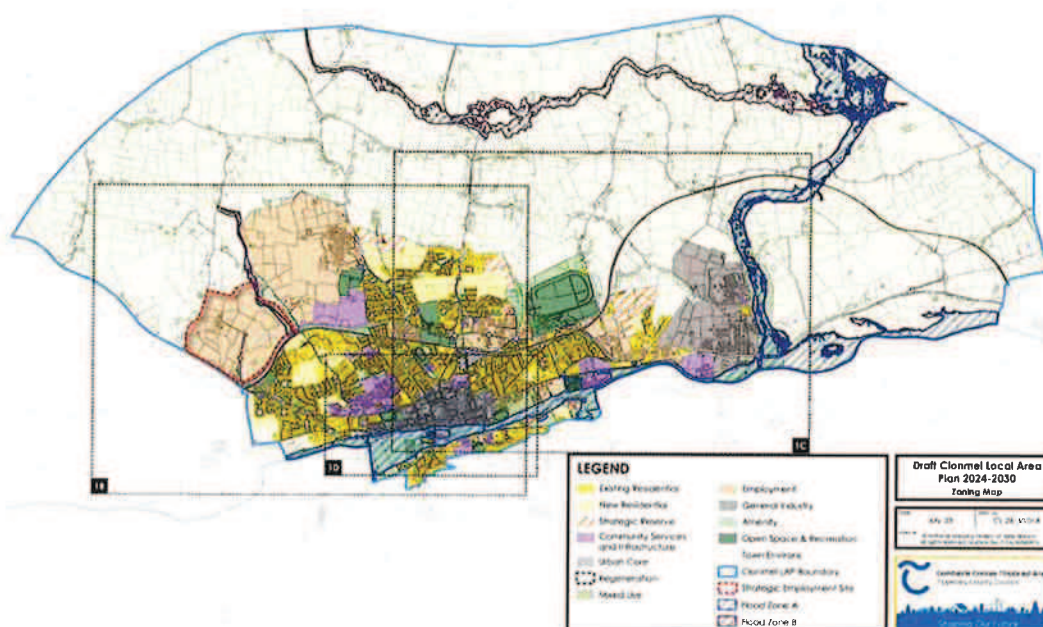


Figure 2: Draft zoning map for Clonmel and Environs Local Area Plan 2024 - 2030

As indicated in Figure 2, a significant portion of the lands are zoned as 'TE – Town Environs'. These lands are generally the surrounding rural hinterland under urban pressure, with a built-up core area consisting of the Clonmel urban settlement.

Residential is a permitted use under 'TE – Town Environs' as per the zoning matrix outlined in Table 15. This is however subject to the criteria as outlined within Section 5.2.4 of the Local Area Plan.

Section 5.2.4 of the Clonmel and Environs Local Area Plan 2024 – 2030 outlines the housing strategy for one-off housing in the town and the environs.

5.2.4 One-off Housing in the Town and Town Environs

Single housing units will be facilitated throughout the town on serviced and infill sites and assessed on a case by case basis. However, lands zoned 'Town Environs' are under urban pressure and have an important role in the long-term growth of Clonmel, particularly in the context of Clonmel's designation as key regional driver and strategic employment location. Whilst they are not required for town growth and expansion at present, in due course the town may grow and additional lands may be required, and haphazard development of one-off housing will impact negatively on future use of lands. The primary use of these lands shall be agriculture in line with the land use zoning matrix as set out in Chapter 9. In exceptional circumstances, with consideration on a case by case basis, a single house may be permitted for a person with an economic need directly associated with agriculture, where there is no alternative site available.

Figure 3: Extract from Draft Clonmel LAP 2024 - 2030

DOWNEY note that Section 5.2.4, similar to Policy HSG10 within the Clonmel and Environs 2013 Plan, is inconsistent with the National, Regional and County guidance on provision of houses within the countryside, which state that rural housing *"should be facilitated by the planning system in all rural areas, including those under strong urban-based pressures"*.

Broadly, it is the objective of National & Regional policy to support balanced regional development and underpin the sustainability of rural areas through enabling applicants to apply for rural housing and demonstrate an economic or social need for housing. Section 5.2.4, in its current form, only enables for an economic demonstration of a housing need which is contrary to the rural settlement strategy at a national level.

We will now outline the grounds of our submission in regard to Section 5.2.4 of the Clonmel and Environs Local Area Plan 2024 – 2030.

5.0 GROUNDS OF SUBMISSION

DOWNEY will now outline the grounds of this submission, which is regarding Section 5.2.4 of the Clonmel and Environs Local Area Plan 2024 – 2030.

5.1 Inconsistent with National and Regional Planning Policy

It is national policy in such areas under urban influence, as set out in National Policy Objective 19 of the National Planning Framework to facilitate the provision of single housing in the countryside, based on the core consideration of demonstrable economic or **social need** to live in such rural areas under urban influence. This would be applicable to lands zoned 'TE – Town Environs' as lands under urban pressure within this plan

Section 5.2.4 only allows for the provision of single houses in rural areas under urban pressure for persons who comply with the economic criterion. The policy does not account for the social criterion as outlined in Policy Objective 19 of the National Framework Plan. Section 5.2.4 effectively provides a

blanket ban on rural housing in these areas unless the person is actively farming or is a son, daughter or one special niece/nephew or grandchild of a farmer.

DOWNEY therefore submit that Section 5.2.4 in its current format, would be inconsistent with the provisions of housing in areas under urban pressure as per the National Planning Framework NPO 19 and the Regional Spatial and Economic Strategy.

5.2 Inconsistent with Tipperary County Development Plan 2022 – 2028

It is important to note, in the context of the Tipperary County Development Plan 2022-2028, that both economic and **social needs** must be accounted for and clear direction on framing these needs for the purpose of informing planning applications must be clearly set out within the proposed Clonmel LAP. Economic needs can include farming, forestry and other land use-based activities, and social needs can also cover a broad spectrum of needs, such as the need to remain in the area a person has spent a substantial period of their lives.

By including a social need criterion, this would ensure that Section 5.2.4 is in line with the Tipperary County Development Plan 2022 – 2028, Policy 5 – 11, in facilitating provision of housing based on an economic or social need in areas under strong urban influence and will protect and sustain the rural communities within the County. Doing this will not only recognise and address the requirements for housing opportunities to coincide with the projected population increase of Tipperary, but also to better facilitate sustainable rural development of the County in the long-term.

5.3 Overly Restrictive Policy

There needs to be a relaxation of the current proposal to confine rural housing to those engaged in agriculture through an economic need. Within the Tipperary County Development Plan, Policy 5 – 11 outlines that in areas under urban pressure, those that demonstrate an ‘economic’ or ‘social’ need and meet the criteria will be eligible to apply for housing.

DOWNEY suggests that Tipperary County Council should, as part of the new Clonmel LAP, further expand the rural housing policies for Clonmel and Environs by introducing criteria under an economic or social demonstration for rural housing. Doing this will not only recognise and address the requirements for the many people living and working in the rural areas of Clonmel, but also for those who wish to remain there and support existing family or start a family of their own; or take care of their family for medical related reasons.

It is important that these persons are fully accounted for in the new Clonmel Local Area Plan 2024 - 2030. There are many people currently living in rented accommodation in the Towns of Tipperary, who are travelling from their temporary homes back to the countryside daily to care for aging parents or family members with long-term illness. The Clonmel and Environs Local Area Plan 2024 - 2030 needs to provide sufficient policies and objectives in the new Plan to accommodate these persons who wish to build a home near their families to do so and accord with national to local planning policy.

5.4 Addition of Demonstration of a ‘Social’ need will Create Vibrant Communities.

By introducing the ‘social’ demonstration of a genuine housing need along with an economic demonstration, it ensures that long-term residents of Clonmel and the surrounding environs can have access to housing. This ensures that long-standing residents, under a social need, can reside within close proximity of their family home under family ties, economic opportunities, medical reasons etc.

This would be in accordance with the vision of the NPF and County Development Plan to create sustainable and vibrant rural communities. By enabling lands zoned ‘TE – Town Environs’ to facilitate single houses via an economic or social need, it ensures that the proposed LAP will be consistent with Tipperary County Council’s own Development Plan strategic objectives and vision for the proper planning and sustainable development of the area.

6.0 CONCLUSION

DOWNEY, Chartered Town Planners, [REDACTED] have prepared this submission to the Draft Clonmel and Environs Local Area Plan 2024 - 2030. This submission is made on behalf of our client, [REDACTED] in relation to section 5.2.4 outlining the Council’s policy to one-off housing. The subject lands zoned ‘TE – Town Environs’ are restricted to an economic rural housing need only. It is respectfully submitted that for the reasons set out in this submission, section 5.2.4 of the Clonmel and Environs Local Area Plan 2024 – 2030 is contrary to the proper planning and sustainable development of Clonmel for the following reasons:

- It is inconsistent with National and Regional Planning policy regarding demonstrating an economic or social rural housing need;
- It is inconsistent with Tipperary County Development Plan 2022 – 2028 Policy 5 – 11 in allowing for a demonstration of an economic or social need for housing within areas under urban influence;
- The policy is too restrictive in only permitting one-off housing through an economic need. This discourages people from residing in the environments of Clonmel which they may have an extended family history and ties to the area; and need to take care of their families for any medical reasons.
- Addition of Demonstration of a ‘Social’ need will Create Vibrant Communities.

DOWNEY suggests that Tipperary County Council should, as part of the proposed Clonmel LAP, further expand the rural housing policies for the County. Doing this will not only recognise and address the requirements for the many people living and working in the rural areas of Tipperary, but also for those who wish to remain there and support existing family or start a family of their own.

It is important that these persons are fully accounted for within the Clonmel Local Area Plan 2024 – 2030, which would align with the Tipperary Development Plan 2022-2028. There are many people currently living in rented accommodation in the Towns of Tipperary, who are travelling from their temporary homes back to the countryside daily to care for aging parents or family members with long-term illness. The Clonmel Local Area Plan 2024 - 2030 needs to provide sufficient policies and

objectives in the new Plan to accommodate these persons who wish to build a home near their families to do so, under a social demonstration of a housing need alongside an economic criterion.

This would be in line with national and regional policy and will protect and sustain the rural communities within the County. Doing this will not only recognise and address the requirements for housing opportunities to coincide with the projected population increase of Clonmel and Environs, but also to better facilitate sustainable rural development of the County in the long-term.

DOWNEY trust that you will take the grounds of this submission into consideration when reviewing submissions to the Draft LAP and in the preparation of the final Clonmel Local Area Plan 2024 – 2030.

