

Chief Executive's Report
on the
Public Consultation
regarding the
**Draft Letterkenny Plan and Local Transport
Plan 2023-2029**

**Community, Development
& Planning Services,**

March, 2023



**Comhairle Contae
Dhún na nGall**
Donegal County Council

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1.0 Introduction

1.1 Background

This report relates to submissions and observations received from the public and prescribed bodies following the publication of the Draft Letterkenny Plan and Local Transport Plan 2023-2029 (the Draft LAP) under Section 20 of the Planning and Development Act 2000 (as amended). When adopted, the Letterkenny Plan will replace the current planning policy framework for the town of Letterkenny, as contained in Part C of the County Development Plan 2018-2024.

1.2 Legislative Requirements

Under Section 20 of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on the submissions and observations received during the public consultation period in respect of the Draft Letterkenny Plan.

In accordance with Section 20(3)(c)(ii.) of the Act, the Chief Executive's report is required to:

- List the persons who made submissions or observations;
- Provide a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator and the submissions and observations made by any other persons in relation to the draft LAP and;
- Contain the opinion of the Chief Executive in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

1.3 The Consultation Period

In accordance with Section 20(3) of the Planning and Development Act 2000 (as amended), the Planning Authority published notice of the proposal to make the Draft LAP in newspapers circulating in the area and advertised via social media and the Council's website. Copies of the Draft LAP, inclusive of the associated Environmental Report, Natura Impact Report, Strategic Flood Risk Assessment and Traffic Modelling Report were made available from Friday 6th January – Friday 17th February (both dates inclusive) at the following Council offices:

- The Planning Office, Donegal County Council, County House, Lifford
- Letterkenny Public Services Centre, Neil T. Blaney Road, Letterkenny
- Milford Public Services Centre, Main St., Milford
- An Clochán Liath (Dungloe) Public Services Centre, Gweedore Road, An Clochán Liath
- Donegal Town Public Services Centre, Drumlonagher, Donegal Town.

1.4 Strategic Environmental Assessment

The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by SI No. 201 of 2011) transposed the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law. A Strategic Environmental Assessment (SEA) of the Letterkenny Plan is a mandatory requirement pursuant to Article 14B of the aforementioned Regulations, as the total population of the Plan area is greater than 5,000 persons; and an Environmental Report was thus prepared for, and accompanied publication of, the Draft Letterkenny Plan.

1.5 Appropriate Assessment

The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, as amended by Council Directive 97/62/EC), and both involve a number of steps and tests that need to be applied in sequential order. An AA Natura Impact Report was thus prepared for, and accompanied publication of, the Draft Letterkenny Plan.

1.6 Strategic Flood Risk Assessment

A Stage 2 Strategic Flood Risk Assessment (SFRA) was prepared to inform the preparation of the Draft Letterkenny Plan. The report was prepared by RPS Consulting Engineers who were appointed following a public tendering competition.

1.7 Next Steps

In accordance with the Sections 20(3)(d) of the Planning & Development Act 2000 (As Amended), the Members are now requested to consider the Draft LAP and the Chief Executive's Report. Following consideration of the Chief Executive's report, the LAP shall be deemed to be made, amended or revoked, as appropriate, in accordance with the recommendations of Chief Executive as set out in his report, 6 weeks after the furnishing of the report to all the members of the authority, unless the planning authority, by resolution, decides to make or amend the plan otherwise than as recommended in the Chief Executive's Report.

The Chief Executive's Report will be presented for formal consideration at the Special Plenary Council meeting of 24th April, 2023 with a view to completing this stage of the Plan and seeking authorisation and a Resolution to proceed to issue Material Alterations as appropriate.

1.8 Recommendation

In accordance with Section 20(3)(d) of the Planning & Development Act, 2000 (As Amended), it is recommended that the Members consider the Draft Letterkenny Plan and Local Transport Plan 2023-2029 and Environmental Report and other associated reports, together with the 'Chief Executive's Report', and thereafter decide that the Draft LAP should be amended in accordance with the list of proposed Material Alterations contained in Section 6.0 of the Chief Executive's Report, subject to further steps as set out in Sections 20(3) of the Planning & Development Acts, 2000 (As Amended) including determinations as to whether a Strategic Environmental

Assessment and/or Appropriate Assessment are required in respect of one or more of the proposed material alterations.



John G. McLaughlin
Chief Executive

2.0 Office of the Planning Regulator

Recommendation 1 of the OPR submission refers to the fact that the County Development Plan Core Strategy was not varied to incorporate the objectives of the NPF and RSES as required under Section 11(1)(b) of the Act and requires the Planning Authority to 'ensure that the policy framework that will apply to future development in Letterkenny is both clear and consistent with the requirements of the Act'. The NWRA also raises this issue.

Chief Executive's Response: The Chief Executive's Response at Section 5.2 sets out how this Letterkenny Plan may be aligned with the emerging County Development Plan, 2024-2030 Core Strategy. It should also be noted that in the interim period between adoption of the Letterkenny Plan and the new County Development Plan, it is proposed that a procedural variation of the County Development Plan, 2018-2024 could be undertaken to delete the Letterkenny content contained therein.

3.0 Public Consultation

The public consultation period commenced on 6th January 2023 and concluded on 17th February 2023 (both days inclusive).

A total of 61 submissions were received comprised of 13 from Prescribed Bodies/Environmental Authorities and 48 from other interested parties.

4.0 Overview of Submissions

4.1 Submissions from Statutory Bodies

A total of 13 submissions were received from Prescribed Bodies/Environmental Authorities. The submissions cover a wide range of themes, such is the broad remit of the agencies concerned. However, there are two over-arching influences that permeate the submissions from the prescribed authorities (including the Dept. of the Environment, Climate and Communications; the National Transport Authority, the Office of the Planning Regulator (OPR) and the Northern and Western Regional Assembly) – that is, (i.) the need for Climate Action and (ii.) the need to adhere to the population projections for Letterkenny as set out in the National Planning Framework and Regional Spatial and Economic Strategy and to reduce the amount of land proposed to be zoned for housing development accordingly.

In addition to these two over-arching themes, the submissions from the prescribed bodies dealt with a wide range of other issues including transport, flooding, education, archaeology, water and wastewater infrastructure, matters concerning aviation and environmental considerations.

4.2 Submissions from Members of the Public

A total of 48 submissions were received from members of the public. Similar to the submissions from Prescribed Bodies/Environmental Authorities, the submissions cover a wide range of issues including public transport, housing land, town centre issue and a number of site-specific and miscellaneous matters.

5.0 Consideration of Submissions by the Chief Executive

The following sections of this report summarise the content of submissions received by way of a number of distinct themes and provide the response of the Chief Executive in relation to the issues raised. Thereafter, Section 6 of the report sets out the recommendations of the Chief Executive in relation to the content of the Draft LAP.

5.0 Key Themes

5.1 Climate Action

The **OPR** has raised the issue of climate change in a number of contexts. Firstly, it is contended that the provision of excess zonings and inappropriately located land use zoning objectives makes development difficult to coordinate and has implications for the implementation of compact growth and integrated land use and transport planning, thereby affecting the ability to meet climate action obligations. Secondly, the OPR considers that the Local Transport Plan (LTP) is overly focussed on road building projects and is not consistent with more recent transport policy to reduce carbon emissions by facilitating and encouraging walking, cycling and other sustainable modes (this matter is dealt with in detail in the 'Transport' section below). Thirdly, the OPR is concerned that the Strategic Flood Risk Assessment prepared in support of the Plan does not adequately justify a number of proposed zonings on lands that may be subject to flood risk, nor contain sufficient detail/analysis in respect of the future flood risk likely to be experienced in Letterkenny. The OPR also recommends (Recommendation No. 15 of the OPR submission) that additional detail be incorporated into the LAP to ensure that Sustainable urban Drainage Systems (SuDS) and nature-based solutions to surface water management are implemented consistently throughout the town and further recommends that policies LK-TC-P-05, CAM-LK-P-2, CAM-LK-P-6 and LK-NBH-P-1 of the LAP are reviewed in this regard (flooding and surface water management issues are dealt with in section 5.4 below).

The **Department of the Environment, Climate and Communications (DECC)** submissions states that the step change in our ambition from a low carbon to climate neutral Ireland requires strong leadership across Government and the wider public sector. The Department notes and supports the Local Authority's facilitation of the reduction of greenhouse gas emissions from transport, under the Local Transport Plan for Letterkenny and supports the objectives in the LAP relating to compact growth, strengthening public transport linkages, the implementation of an active travel strategy, and supporting the growth of Electric Vehicles through recharging infrastructure. The inclusion of actions with regard to biodiversity and carbon sinks are also welcomed. The Dept. notes that the latest iteration of the Climate Action Plan (2023) was launched in December 2022 and requests that the LAP be updated as necessary in accordance with that document. The Department notes and supports the policy of the Council which requires new residential and commercial developments to give due consideration to environmental

sustainability and energy efficiency measures and encourages the Council to examine the potential of district heating. Policy in the LAP to support the development of renewable energy is also welcomed.

The **National Transport Authority (NTA)** submission notes that, under the Climate Action and Low Carbon Development (Amendment) Act, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The contribution of the NTA as regards how the LAP should contribute towards this reduction is dealt with in detail in the Transport section below.

The **Northern and Western Regional Assembly (NWRA)** submission states that the updated Government Climate Action Plan, published in Quarter 4 of 2022, contains several significant modifications to the CAP of 2021 and accordingly the LAP should be reviewed to ensure it fulfils all new ambitions in this respect.

The submission from **ESB** notes Government ambitions for Electric Vehicle (EV) adoption in Ireland and welcomes the policy support in the LAP which facilitates the provision and roll-out of EV charging points at appropriate locations in Letterkenny.

The **OPW** submission makes reference to climate change in the context of flooding and surface water management. This is addressed in the section on flooding below.

Chief Executive's Response:

I would refer firstly to the strong support provided by the Department of the Environment, Climate and Communications for many of the Climate Action policy initiatives contained in the Draft LAP; this is reflective of the Council's forward-thinking approach and support for Ireland's transition to a climate-neutral society.

In relation to zoning matters referred to by the OPR, the Council has at all times endeavoured to provide for the compact growth of Letterkenny, and indeed the zonings contained in the Draft LAP fall within national and regional targets regarding development 'within the existing built up footprint' of the Regional Centre. Notwithstanding, it is acknowledged that the growth targets set out in the Draft LAP exceed those set out in the NPF Implementation Roadmap and the Regional Spatial and Economic Strategy. These targets were set in good faith, having regard to Letterkenny's role as a designated Regional Centre and the need to provide flexibility in the housing market so as to stimulate residential development in the town. However, it is accepted that zoning decisions in Letterkenny can be revisited at a later date as the sequential development of the town progresses. Section 5.2 below (entitled 'Population Projections and Housing Land Supply') therefore sets out recommendations for the re-zoning of certain lands to bring the Draft LAP more into line with the population figures (and thus the housing land requirement figures) set out in the NPF and RSES.

In relation to the commentary of the NWRA and the DECC concerning the publication of the Climate Action Plan 2023, **it is recommended that references in the Draft Plan to the 'Climate Action Plan 2021' be updated as necessary (see Recommendation 1 in Section 6.1 of this report) – this is considered to be a non-material alteration.**

5.2 Population Projections and Housing Land Supply

The **OPR** submission states that Section 19(2) of the Act requires the LAP to be consistent with any RSES. The submission commends Donegal County Council for embracing ambitions for the Regional Growth Centre but advises that the growth targets in the Draft Plan do not align with those of the RSES and states (Recommendation 2 of the OPR submission) that the planning authority is required to amend the population and housing targets to be consistent with the RSES population and housing growth targets, pro rata with the 6 year statutory LAP period only. The text of Recommendation 2 is reproduced below for clarity.

(The submission from **Uisce Éireann** also notes that the population projections and ambitions included in the Draft LAP are considerably higher than the minimum uplifts identified in the Northern and Western Regional Spatial and Economic Strategy of 6,600 to 2031 and 8,000 to 2040.)

Recommendation No. 2 of the OPR

Having regard to the:

- **growth targets for Letterkenny under RPO 3.7.20 and RPO 3.7.23;**
- **targets for compact growth NPO 3a, NPO3c and RPO 3.7.22;**
- **provisions for the sequential approach to land use zoning under the Development Plans Guidelines for Planning Authorities (2022);**
- **6 year plan LAP period; and**
- **growth that has taken place in the settlement since census 2016;**

the planning authority is required to amend the population and housing targets to be consistent with the RSES population and housing growth targets, pro rata with the 6 year statutory local area plan period only.

Recommendation No. 3 of the OPR goes on to state, inter alia, that **the planning authority is requested, taking account of the potential housing yield from the extensive and underdeveloped Town Centre land use zone in table 10.2, to:**

- (i) review its determination of housing yield from proposed zoned lands in the draft LAP; and**
- (ii) amend, on foot of point (i), the land use zoning areas proposed in the draft LAP, including the extent of new ‘Primary Residential’ and / or ‘Opportunity Sites’, consistent with the amendments to the housing targets under Recommendation 2.**

In terms of density standards, the OPR submission states that the planning authority has applied a density standard that does not have regard to the recommended standards under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages (2009) and that is inconsistent with RPO 3.7.27 of the RSES, which requires a minimum target of 50uph for the town centre area and a general default rate of 35uph otherwise. The OPR consider that the Draft LAP has proposed considerable excess zoning for residential use, inconsistent with the delivery of compact growth.

In view of, inter alia, the growth targets for Letterkenny set out in the RSES, the need to promote compact growth, town centre development objectives and the Government’s Town Centre First Strategy and guidelines on Sustainable Residential Development, the OPR makes (under

Recommendation 4 of their submission) a number of site specific zoning recommendations in relation to housing land, as follows –

Summary of OPR Recommendation No. 4

Amend the following land use zoning objectives from ‘Primarily Residential’ to either ‘Strategic Reserve’ or ‘Agriculture’:

- **PR1(lands at Kilttoy)**
- **PR13 (lands at Ballymacool)**
- **PR15, PR16, PR17, PR18 and PR22 (all located in Killyclug/Killylastin) NB – the NTA also expressed concern regarding the peripherality of these sites**

and to amend or omit relevant associated text from the Draft LAP.

The OPR also makes a number of specific recommendations regarding Opportunity Sites (see Recommendation 5 of OPR submission), as follows –

Summary of OPR Recommendation No. 5

Amend the following land use zoning objectives:

- **Opportunity Site 1 (Gortlee House) - from ‘Opportunity Site’ to ‘Primary Residential’**
- **Opportunity Site 7 (High Road) - from ‘Opportunity Site’ to ‘Primary Residential’**
- **Opportunity Site 11 (former Oatfield site) - from ‘Opportunity Site’ to ‘Primary Residential’**
- **Opportunity Site 12 – from ‘Opportunity Site 12’ and ‘masterplanned approach’ to ‘Strategic Residential Reserve’**
- **Opportunity Site 3 – to omit consideration of residential use.**

With regard to the **Strategic Residential Reserve** lands identified in the Draft LAP, the OPR recognises the value of this designation as an indicator of the future growth of the town in long term and as a tool to protect strategically located lands. However, the OPR is concerned with the Strategic Residential Reserve proposed to the west of Letterkenny, contending that the scale of the SRR designation is excessive in view of the growth targets for Letterkenny to 2040 and further contending that the southern portion of the SRR designation is ‘non sequential’ and leapfrogs an area of ‘Local Environment’ lands at Whinney Hill. The OPR also argues that development of the SRR lands would necessitate substantial additional roads infrastructure. Recommendation 7 of the OPR submission therefore requests that the planning authority delete the Strategic Residential Reserve lands and associated strategic and development led roads objectives to the west of the town.

In terms of the **Southern Strategic and Sustainable Development Site (SSDS)**, the OPR welcomes the inclusion of this site and notes that the identification of these lands is consistent with the provisions of the RSES (whilst also noting the significant infrastructural deficiencies in the area). However, the OPR considers that the delivery of the entire SSDS Site over a single

plan period is not likely feasible, sustainable or necessarily desirable and suggests that the Draft LAP should prioritise the delivery of the northern portion of the site, which are closer to the town centre. Recommendation 8 of the OPR submission therefore requests, inter alia, that the planning authority prioritise the development of the SSDS site north of the proposed Southern Network Project and zone the southern portion of the SSDS site (i.e. south of the Southern Network Project) as 'Strategic Residential Reserve'.

In relation to the '**Strategic Community Opportunity**' zoning at Knocknamona, the OPR accept as reasonable the proposal that student accommodation be accommodated on these lands, but make an observation to the effect that any such accommodation should be located on the southernmost section of the site, which would better facilitate active travel and compact growth (Observation 1i.).

With particular regard to town centre lands, Observation 2 of the OPR submission requests that the planning authority review and amend the extent of land zoned Town Centre with a view to consolidating the town centre lands into a more manageable, prioritise town centre area, and providing for residential development, in particular on appropriate centrally located sites conducive to active travel modes.

The submission from the **NWRA** commends the Council on the publication of the Draft LAP and notes that a key priority of the RSES and an ongoing focus for the Assembly is the accelerated growth of the Regional Centre of Letterkenny. The submission notes that recent preliminary Census data and housing commencement / completion statistics indicate that Letterkenny is currently well behind targets in terms of demographic growth and in housing supply and the NWRA submission suggests that the LAP should contain greater information in this regard and indeed greater information in relation to the main objectives/ambitions for Letterkenny over the next 6-8 years. The NWRA submission notes that the Draft Plan does not reference the absence of a Housing Need Demand Assessment (HNDA), a key piece of the evidence base in the preparation of a plan. The NWRA advise that the Draft LAP should be consistent with National and Regional frameworks (i.e. NPF and RSES) and suggest that the planning authority should consider a review of the overall growth ambitions to ensure alignment with these frameworks, with a general ambition to grow Letterkenny by at least 40% to 2040. The NWRA note that the Draft LAP should state targets for the 6 year plan period and should contain commentary on the extent of extant planning permissions.

In terms of the location of lands earmarked for residential growth in the Draft LAP, the NWRA state that said lands are 'in the main, located within the existing development envelope of Letterkenny and, if advanced, will deliver compact growth'. The Assembly consider that it would be beneficial if the Plan contained some reference as to how the extent of Compact Growth is to be measured in an overall context, as envisaged under RPO 3.2 (40% of all new housing within Regional Growth Centre's to be delivered within the existing built up footprint). The submission notes that average housing delivery in Letterkenny between 2016-2021 was in the order of 50-60 units per annum, meaning that housing supply would have to be increased tenfold to meet the targets of the Draft Plan as published. It is contended that the Plan does not outline what measure will be implemented to achieve such a target.

As regards the SSDS, the NWRA suggest that the planning authority should consider amending the wording of Sec. 10.7.7 (Infrastructural Masterplan for SSDS) to set out a definitive timeframe within the lifetime of the LAP to provide the necessary infrastructure to enable several thousand homes to be developed; noting also that funding has been provided for similar engineering and infrastructural works elsewhere (West Dublin – Clonburris). Notwithstanding the foregoing, the NWRA also advise that 'the suitability of the lands for the delivery of housing units needs to be evidenced through the application of the tiered methodology requirements in the NPF for the

classification of zoned land. In the absence of this methodology being satisfied the zoning should not be advanced during this plan period and alternative lands should be explored elsewhere where the tests are met’.

Chief Executive’s Response:

Population Projections

Section 5.1 of this report acknowledges the fact that the the growth targets set out in the Draft LAP exceed those set out in the NPF Implementation Roadmap and the Regional Spatial and Economic Strategy, primarily in an attempt to stimulate the underactive housing market in Letterkenny and thus bolster the Regional Centre. Notwithstanding, the submissions of the OPR and NWRA in particular are noted as regards the population projections set out in the Draft LAP and the need to maintain consistency with the NPF and RSES. In this respect, it is noted that the ‘vision’ of the RSES for Letterkenny refers to an additional 4000 houses being provided in Letterkenny between 2020-2040 (this equates to 200 houses per annum), whilst **RPO 3.7.23** seeks to ‘provide an additional 3,000-4,000 residential units within Letterkenny to facilitate the growth as set out in **RPO 3.7.20**’ (i.e. to grow Letterkenny to a minimum of 27,300 residents by 2040). The population projections for Letterkenny as set out in the RSES (see table 1 below) provide for a growth of 440 persons per annum in Letterkenny between 2016 and 2031, and assuming an occupancy rate of circa 2 persons¹ per dwelling unit (as indicated in the preliminary results from Census 2022) this would equate to a requirement for approximately 220 dwellings per annum in Letterkenny (for the purpose of the calculations in the Draft LAP is it considered reasonable to utilise a broad estimate of 200 units per annum, or 1200 over the 6 year lifetime of the LAP).

Table 1 - Projected Population Growth in Letterkenny (taken from RSES)

Letterkenny 2016	Letterkenny uplift 2026	Letterkenny uplift 2031	Letterkenny 2040
Population: 19,300	4400	2200	Population: 27300

In terms of tying in with the RSES population projections (which are derived from the ‘Implementation Roadmap’ for the NPF), it must be noted that the RSES projections start from a ‘base’ year of 2016 and thereafter envisage a population growth of 440 persons each year out to 2031 (or 200 additional dwellings per annum being constructed in the town). However, when we look at housing completions since 2016 (see Table 2) we can see that in fact only 373 dwellings were completed in the 7-year period 2016-2022, rather than the ~1400 projected by the RSES; a shortfall of approximately 1000 units.

If we are to meet the growth targets envisaged for the Regional Centre, it is evident that we must plan for the 200 dwellings per year envisaged in the RSES (1200 units over the lifetime of the LAP) but must also make up for the recent significant shortfalls in housing construction. There is therefore a need to plan for the construction of at least 2200 residential units over the 6-year life of the Letterkenny Plan and it is worth noting that this figure aligns very closely with the emerging Core Strategy for the County Development Plan 2024-2030, which utilises the population projections outlined in the NPF and the methodology outlined in the ‘Housing Supply Target Methodology for Development Planning’ Guidelines for Planning Authorities to arrive at an estimated need for 2300 dwellings in Letterkenny over a 6-year period. Utilising the higher

¹ NB – this figure is provisional only, based on the preliminary results from census 2022

figure of 2300 units, and having regard to the OPR's requirement for minimum densities of 50 units per hectare (uph) in the town centre and 35 uph elsewhere, this equates to a requirement for approximately 57 hectares of zoned residential land outside of the town centre (NB – in arriving at this figure, an allowance has been made for approximately 300 units to be delivered in the town centre over the lifetime of the LAP and it is worth noting that the Council intend to be at the forefront of this delivery as evidenced by the advancing mixed-use development on the Port/Pearse Road as part of the Alpha and Beta Business and Innovation Centre project). The foregoing consideration are reflected in **Recommendations 1-4 of Section 6.2 of this report.**

Members are advised to note that, notwithstanding the 57 hectare requirement referred to above, the land-use zoning map accompanying the Draft LAP (if amended as per the recommendations contained herein) will in fact exceed 57 hectares in terms of the amount of residential land proposed to be zoned. The table below provides details in this regard (Members will note that a total of 87Ha is proposed – a surplus of 30Ha. This is a reduction of circa 30Ha from the proposed in the initial draft and is considered reasonable to ensure market choice for housing in Letterkenny, which has suffered from very low levels of private housing completions in recent years).

Area of lands proposed for Residential Zoning (NB – sites will be renumbered sequentially prior to publication of any material alterations)

Site Ref.	Area (Ha)
Primarily Residential	
PR1	10.75
PR2	1.00
PR3	1.97
PR4	0.79
PR5	5.00
PR6	13.4
PR7	1.14
PR8	0.45
PR12	3.83
PR13	5.10
PR14	0.85
PR19	0.55
PR20	1.93
PR21	1.46
Total	48.22
Opportunity Sites	
OPP1	14.5
OPP2	3.35
OPP4	2.20
OPP5	2.32
OPP6	0.32
OPP8	5.10
OPP9	7.8 (50% of site area)
OPP10	1.83
OPP11	1.44

Total	38.86
Total PR plus OPP sites	87.08

Site-Specific Issues

The OPR has made a number of site-specific recommendations that seek to omit residential zonings in certain locations, and these are dealt with further below. However, the OPR recommendations will not in themselves reduce the housing land supply to the levels required and it will therefore be necessary to omit additional residential zonings based on the principles of compact growth and servicing requirements. Further detail on these recommended omissions is set out below, subsequent to the following commentary in relation to the OPR's site specific zoning recommendation -

PR Sites 15, 16, 17, 18 and 22 – The OPR raises concerns in relation to the zoning of these greenfield sites, located at the remote northwest of the town. In light of the focus on compact growth in national and regional policy, the revised housing land supply required by the OPR and the existence of alternative housing lands closer to the town centre, **the recommendation of the OPR to rezone these lands as ‘Strategic Residential Reserve’ or ‘Agriculture’ is accepted (see Recommendation 5 in Section 6.2 of this report).**

PR Sites 1 and 13 – These sites are located in Kiltroy and Ballymacool, respectively. The OPR has recommended that both sites be rezoned from ‘Primarily Residential’ to either ‘Strategic Residential Reserve’ or ‘Agriculture’.

PR Site 13 is located approximately 5 minutes walk from Lower Main Street, in close proximity to a substantial leisure complex (Aura Leisure Centre) and in one of the few areas of the town where there are relatively gentle gradients that are conducive to active travel. Similarly, Site PR1 is located within walking distance of the Educate Together National School and the local shops and services at Ballyraine (approx. 5 mins walk) and is also in an area of the town that does not suffer from very steep gradients. Furthermore, Site PR1 presents a significant opportunity to increase permeability and connectivity between the Kiltroy Road to the north and the Ramelton Road to the south. It is considered that both of the sites have significant merit in terms of providing future housing opportunities in Letterkenny and I do not agree with the suggestion of the OPR that the lands are not desirable in terms of facilitating active and sustainable modes of travel, particularly in light of their close proximity to services and the relatively gentle gradients in the areas as referenced above. For these reasons **it is considered that the Members should decide not to comply with Recommendation No. 4 of the OPR submission as it relates to sites PR1 and PR13 and that the ‘Primarily Residential’ zoning should remain in place on both of these sites – see Recommendation 6 in Section 6.2 of this report.**

Opportunity Site 1 (Gortlee House site) – The OPR has recommended that the zoning of this site be changed from ‘Opportunity Site’ to ‘Primarily Residential’. Having regard to the proximity of the site to the town centre **the recommendation of the OPR is accepted (see Recommendation 7 in Section 6.2 of this report).**

Opportunity Site 7 (High Road) – The OPR has recommended that the zoning of this site be changed from ‘Opportunity Site’ to ‘Primarily Residential’. Having regard to the proximity of the site to the town centre **the recommendation of the OPR is accepted (see Recommendation 8 in Section 6.2 of this report).**

Opportunity Site 11 (former Oatfield Site) – The OPR has recommended that the zoning of this site be changed from ‘Opportunity Site’ to ‘Primarily Residential’. Having regard to the

proximity of the site to the town centre **the recommendation of the OPR is accepted (see Recommendation 9 in Section 6.2 of this report).**

Opportunity Site 12 (Carnamuggagh) – The OPR has recommended that the zoning of this site be changed from ‘Opportunity Site’ and ‘masterplanned approach to ‘Strategic Residential Reserve’. In light of the focus on compact growth in national and regional policy, the revised housing land supply required by the OPR and the existence of alternative housing lands closer to the town centre, **the recommendation of the OPR to rezone these lands as ‘Strategic Residential Reserve’ or ‘Agriculture’ is accepted (see Recommendation 10 in Section 6.2 of this report).**

Opportunity Site 3 (former Unifi lands) – The OPR has recommended that potential for residential use be omitted from these lands, on the basis that the subject lands are peripheral to the town centre and would facilitate car dependent development. Whilst I do not explicitly agree with the OPR’s comments as regards peripherality, it is nonetheless recognised that the greatest benefit offered by Opportunity Site 3 may in fact be derived by focusing on the potential for economic development that consolidates this significant employment area in Letterkenny. In view of this consideration and again having regard to the revised housing land supply requirements of the OPR, **the OPR’s recommendation to omit consideration of residential use on Opportunity Site 3 is accepted (see Recommendation 11 in Section 6.2 of this report).**

As already noted, the omission of residential lands as recommended by the OPR will not in itself be enough to ensure the alignment of the Letterkenny Plan with the projections of the NPF and RSES. Therefore, it is recommended that the following sites are rezoned from ‘Primarily Residential’ to ‘Strategic Residential Reserve’ on the basis that the subject lands will to a large degree be dependent on significant road improvement works to facilitate safe access and connectivity to the town centre and are therefore unlikely to be delivered over the lifetime of the LAP – PR site 9, PR site 10 and PR site 11. These comments are reflected in **Recommendation 12, Section 6.2 of this report.**

In terms of the OPR’s comments (Recommendation No. 7 of the OPR submission) regarding the excessive scale of the **Strategic Residential Reserve (SRR) lands proposed to the west of Letterkenny**, the suggestion that the SRR lands should be ‘deleted’ from the LAP at this point in time is accepted, having regard in particular to the compact growth imperative and the revised growth projections and housing supply targets recommended by the OPR. This is reflected in **Recommendation 13, Section 6.2 of this report.** OPR comments in respect of the indicative strategic road corridor to the west of the town are dealt with in Section 5.6 of this report.

With regard to the future development of the **Southern Strategic and Sustainable Development Site (SSDS)**, the infrastructural constraints in this area have long since been acknowledged by this Council. In terms of prioritising the northern side of the SSDS, I would generally agree with the OPR that this would be beneficial in terms of the future compact growth of Letterkenny and in terms of accessibility to the town centre. Recommendation 8(a) of the OPR’s submission is therefore accepted and this is reflected in **Recommendation 14, Section 6.2 of this report.** Recommendations 8(b) and 8(c) of the OPR, which deal generally with transport and accessibility requirements in the vicinity of the SSDS lands, are dealt with in Section 5.6 of this report.

With regard to the comments of the NWRA to the effect that a definitive timeframe, within the lifetime of the LAP, should be set out to provide the necessary infrastructure to enable several

thousand homes to be developed in the SSDS, it is considered that the precise detail of such matters is outside the control of the Council and is to a large degree dependent on other agencies. Table 6.1 of the Draft LAP (entitled 'Strategic Infrastructural Deficits') set out details of infrastructural deficits in the SSDS area and the proposed means of progressing solutions. Objective DSC1 of the LAP then commits that the Council will 'work strategically with key stakeholders to deliver resolutions to the key infrastructural deficits constraining the growth ambitions for Letterkenny'. Thus, whilst the Council is steadfastly committed to pursuing resolutions to the infrastructural deficiencies in the SSDS (and Letterkenny generally), this will be a matter of collaborative working going forward and there are no definitive timeframes for the SSDS infrastructural works that could be inserted into the Draft LAP at this juncture.

With regard to the OPR's comments (Observation 1i. of the OPR submission) in respect of the **'Strategic Community Opportunity' zoning at Carnamuggagh**, to the effect that any student accommodation should be located on the southernmost section of the site, which would better facilitate active travel and compact growth – this recommendation is accepted and this is reflected in **Recommendation No. 18 in Section 6.2 of this report**. Similarly, the point raised in Observation 1ii. of the OPR is accepted, to the effect that office development on the 'Strategic Community Opportunity' zoning is recommended to be limited to use that is ancillary to the primary uses acceptable in principle within this land use zone - namely School / Education, Playing fields, Cultural Uses / Library, Creche / Playschool and Community / Recreational / Sports. This is reflected in **Recommendation No. 19 in Section 6.2 of this report**.

In addition to the foregoing submissions, several other submissions were received in relation to zoning provisions for residential development. A summary of these submissions is set out below and a **map detailing the location of the lands in question can be found in Appendix B**.

Kathleen Gallagher requests that lands at Mountain Top (see Fig. 1), that are currently outside the LAP boundary, be included within same and zoned as 'Primarily Residential'. It is contended that the area in question is well served by shops and employment and that the development of the site (which previously had planning permission for a multiple development) would contribute towards the strengthening of Letterkenny's urban structure.

Figure 1 - Lands subject of Kathleen Gallagher's submission

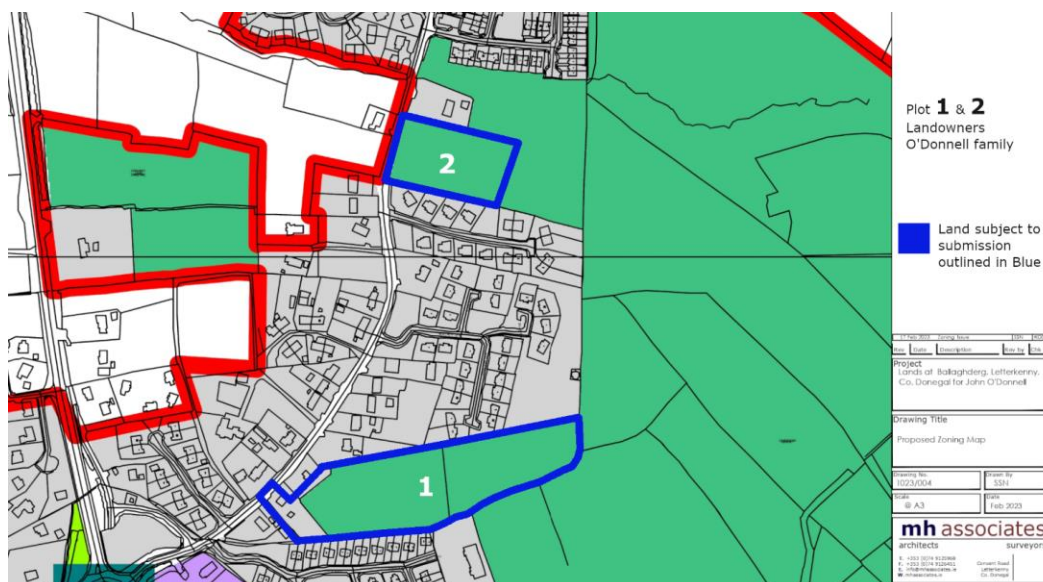


Chief Executive's Response:

The contents of this submission have been noted and considered. Given the peripheral location of these lands and the need to focus on the compact growth of Letterkenny, a 'Primarily Residential' zoning would not be appropriate at this location. The lands are presently occupied by a number of detached dwellings and are not located in an area where the planning authority would envisage any development of scale. Accordingly, the extension of the plan boundary at this location would have little if any practical benefit and accordingly no changes to the land use zoning map are recommended on foot of this submission – see **Recommendation No. 22 in Section 6.2 of this report.**

A submission lodged by **MH Associates on behalf of John O'Donnell and the O'Donnell family** requests that both plot 1 and plot 2 identified in Fig. 2 below be zoned as Established Development, as opposed to Local Environment.

Figure 2 - Map accompanying submission from MH Assoc. on behalf of John O'Donnell and Family



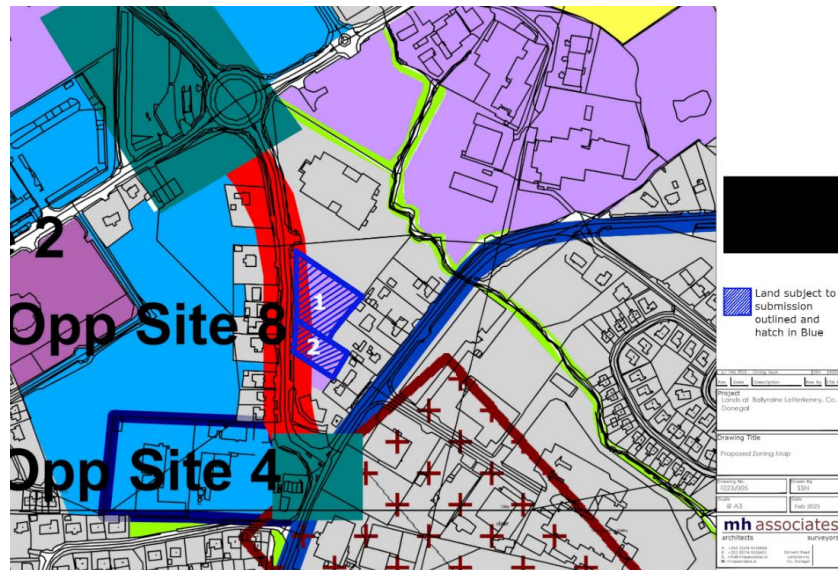
The submission notes that plot 1 is currently zoned as Established Development in the CDP 2018-2024 and that the rezoning of both plots as Established Development would facilitate an opportunity for much needed housing in this area.

Chief Executive's Response:

The contents of this submission have been noted and considered. The subject lands are located in a peripheral location relative to the town centre. Having regard to the need to focus on the compact growth of Letterkenny, significant levels of new housing development are not envisaged in this area and as such, no changes to the land use zoning map are recommended on foot of this submission – see **Recommendation No. 23 in Section 6.2 of this report**

In the Kilty area, a submission lodged by **MH Associates on behalf of DNRP Limited and Lexus Projects Ltd.** seeks to have lands (see Fig. 3) zoned as 'Established Development', in lieu of the 'General Employment and Commercial' zoning identified in the Draft LAP, as the former would facilitate a wider range of uses including residential.

Fig. 3 - Lands subject of submission from DNRP Ltd. & Lexus Projects Ltd.

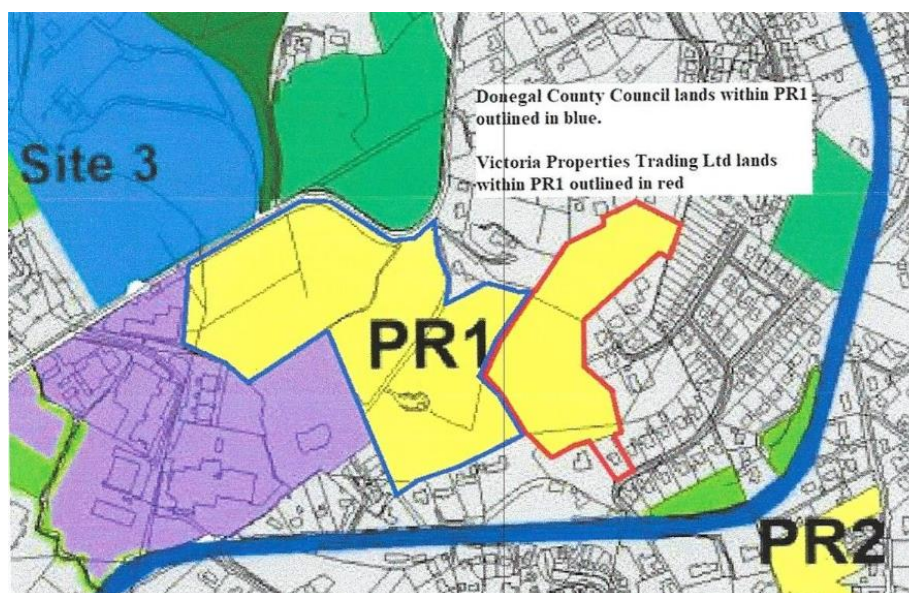


Chief Executive's Response:

The contents of this submission have been noted and considered. The area in question is characterised by a mix of uses, including residential, commercial and retail. In light of this fact and having regard to the 'infill' nature of the subject lands, the proposal to change the zoning from 'General Employment and Commercial' to 'Established Development' is considered appropriate and this is reflected in **recommendation 20, Section 6.2 of this report.**

Also in the Kilty area, **Harley Planning Consultants on behalf of Victoria Properties Trading Ltd.** welcome the designation of Primarily Residential site 'PR1' (see Fig. 4) but request that consideration be given to allowing access to the subject lands via Regional Road R245 or via the Kilty Road (Policy LK-H-P-9a of the published Draft LAP requires access to be solely via the Kilty Road, i.e. Local road L-1134-1).

Fig. 4 - Lands owned by Victoria Properties Trading Ltd. and comprising part of site PR1

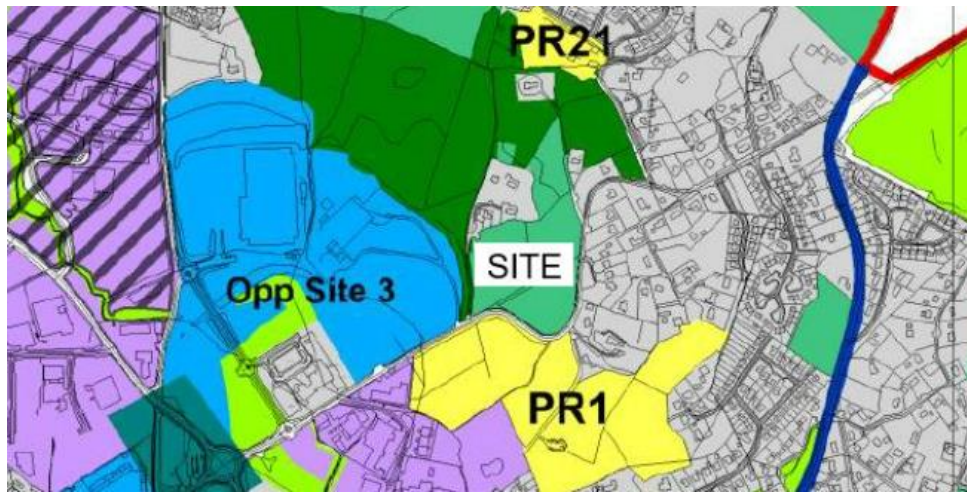


Chief Executive's Response:

The contents of this submission have been noted and considered. Significant consideration was given to potential access arrangements for the subject lands in advance of the preparation of the Draft LAP, in consultation with the Roads Section of the Council and there has been no material change in circumstances. On foot of these considerations and notwithstanding the contents of the submission, it is considered that the only safe means of vehicular access to the site is via the Kilttoy road and accordingly, no changes to policy are recommended in this regard. However, it is recommended that an amendment be provided in respect of Policy LK-H-P-9a(ii.), to stipulate that cycle and wheeling access will also be required to the south of the site (in addition to the pedestrian access already required by policy in the Draft LAP) – **see Recommendation No. 15 in Section 6.2 of this report.**

A submission lodged by [Kenny Burke on behalf of Paul McGettigan of P&C McGettigan Ltd.](#) seeks to have lands rezoned from 'Local Environment' to 'Primarily Residential' (see Fig. 5). The submission contends, inter alia, that the lands are fully serviceable, previously had permission for 135 houses and are fully supported by the methodologies that planning authorities are required to use when zoning land. The submission sets out further detailed arguments as to why the subject lands should be rezoned, including proximity to schools and employment lands.

Fig. 5 - Lands subject of submission from Kenny Burke on behalf of Paul McGettigan

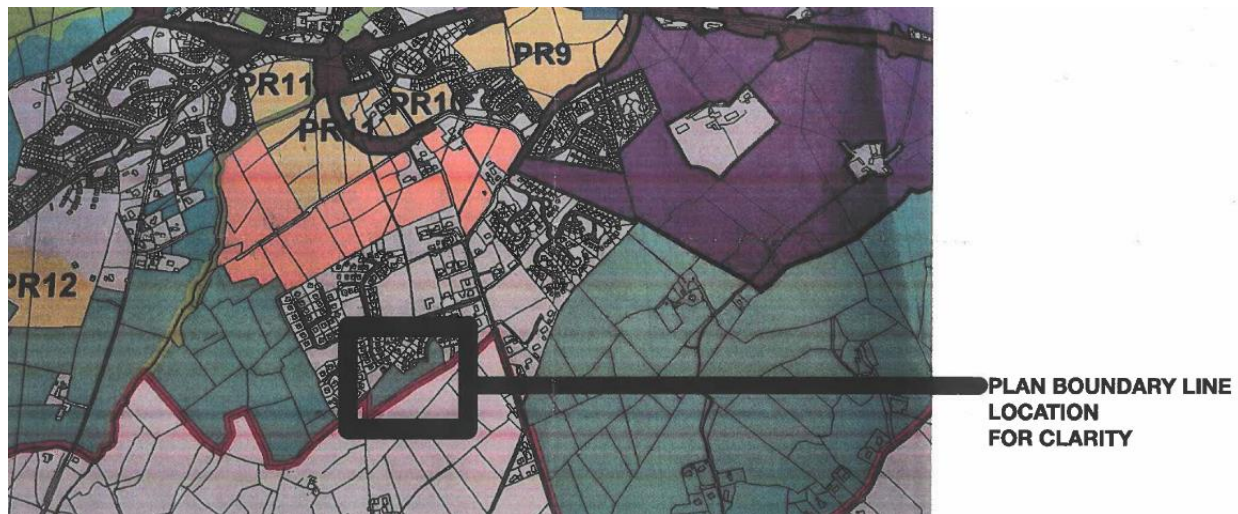


Chief Executive's Response:

The contents of this submission have been noted and considered. The location of the subject lands proximate to schools and employment is acknowledged. However, the subject site fails to offer benefits in terms of potential connectivity and permeability through the wider area such as those offered by Site PR1 to the south (which has the potential to allow for excellent connectivity from the Kilty area through to the Ramelton Road) and furthermore is not particularly conducive to development by reason of the considerable gradients that exist on site. Having regard to the foregoing therefore, and to revised housing land supply targets required by the OPR, no changes to the zoning map are recommended on foot of this submission - **see Recommendation No. 24 in Section 6.2 of this report.**

John McCallion has lodged a submission in respect of lands at Lismonaghan (see Fig. 6), which are 'split' by the LAP boundary. The submission advises that Mr. McCallion is not seeking any changes to the plan boundary as currently drafted.

Figure 6 - Location of lands subject of submission from John McCallion

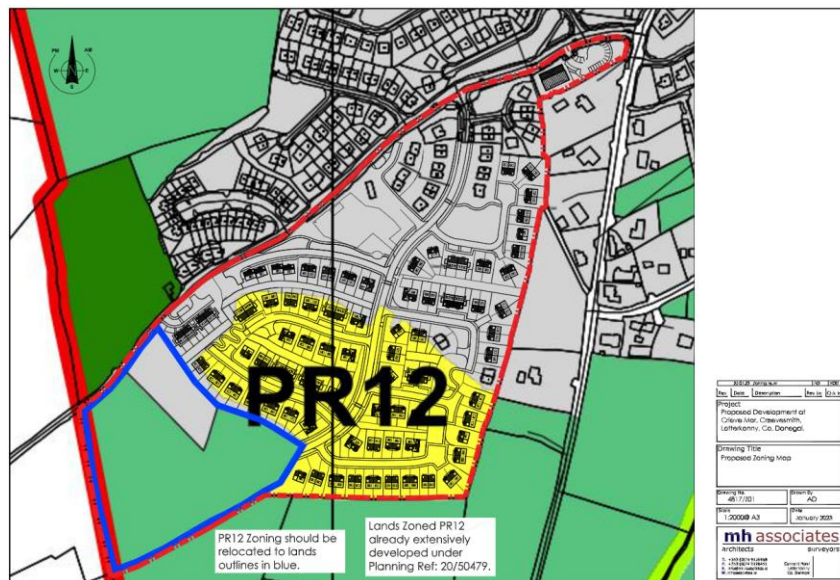


Chief Executive's Response:

The contents of this submission have been noted.

Harley Planning Consultants Ltd. on behalf of GDC (Irl.) Ltd. have lodged a submission contending that the lands zoned PR12 in the Draft LAP will likely be fully built out and occupied within months of the adoption of the LAP. As such, GDC request that the lands adjoining PR12 and outlined blue on Fig. 7 below, be zoned 'Primarily Residential' and that the currently identified PR 12 be zoned as 'Established Development'. The submission details a range of additional arguments in support of the rezoning request, including considerations of servicing, location and the development history of GDC.

Fig. 7 - Lands subject of submission from Harley Planning Consultants on behalf of GDC (Irl) Ltd.

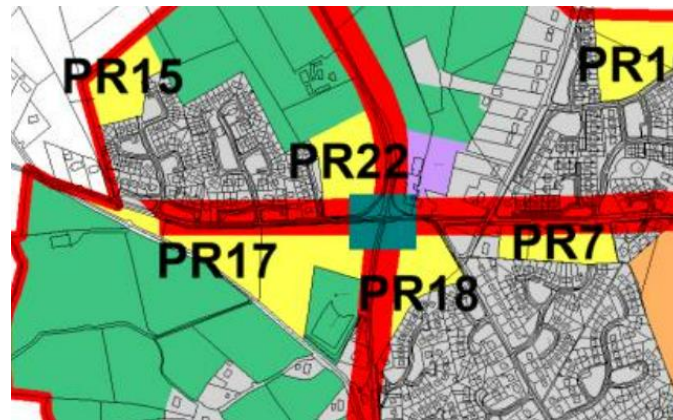


Chief Executive's Response:

The contents of this submission have been noted and considered and it is acknowledged that construction works are proceeding on the subject site. Notwithstanding that fact, regard must be had to the revised population projections and housing land supply targets recommended by the OPR and NWRA and to the extent of residential land already proposed at other locations within the plan boundary, which amongst things has been identified in a manner that provides an appropriate geographical spread of residential development opportunities throughout the town. Having regard to these considerations, the proposal to zone additional 'Primarily Residential' lands to the west of Site PR12 is not considered appropriate and as such, no changes to the zoning map are recommended on foot of this submission - **see Recommendation No. 25 in Section 6.2 of this report.**

A submission has been lodged by **Kenny Burke on behalf of Sean Gallagher**. This submission expresses full support for proposed zoning PR17 and PR18 (see Fig. 8) and sets out a wide range of arguments as to why these zonings should remain on the finalised land-use zoning map.

Figure 8 - Location of sites PR17 and PR18, subject of submission from Kenny Burke on behalf of Sean Gallagher

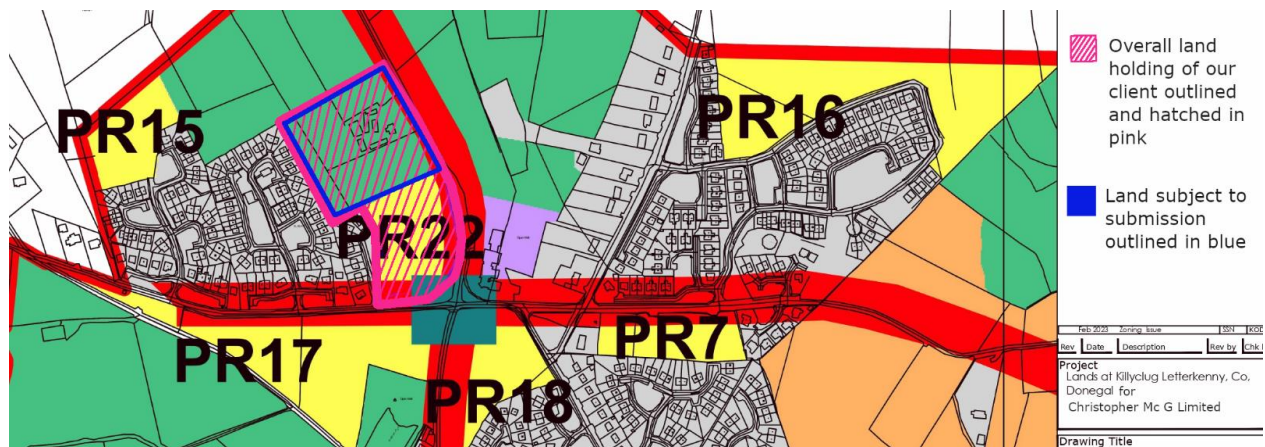


Chief Executive’s Response:

The contents of this submission have been noted and considered. As already noted in Section 5.2 of this report, Recommendation No. 4 of the submission from the OPR requires that the zoning on sites PR17 and PR18 be amended from ‘Primarily Residential’ to either ‘Strategic Residential Reserve’ or ‘Agriculture’. This is reflected in **Recommendation 5, Section 6.2 of this report**, which recommends changing the zoning of these sites from ‘Primarily Residential’ to ‘Strategic Residential Reserve’.

Also at Killyclug, **MH Associates submission on behalf of Christopher McGettigan** requests that the lands outlined in blue on Fig. 9 below be zoned as ‘Primarily Residential’ in lieu of ‘Local Environment’. The submission outlines a number of arguments in support of the proposed rezoning. The submission also notes that construction has commenced on site PR15 and thus suggests that this site should be rezoned as ‘Established Development’.

Figure 9 - Lands subject of submission by MH Assoc. on behalf of Christopher McGettigan



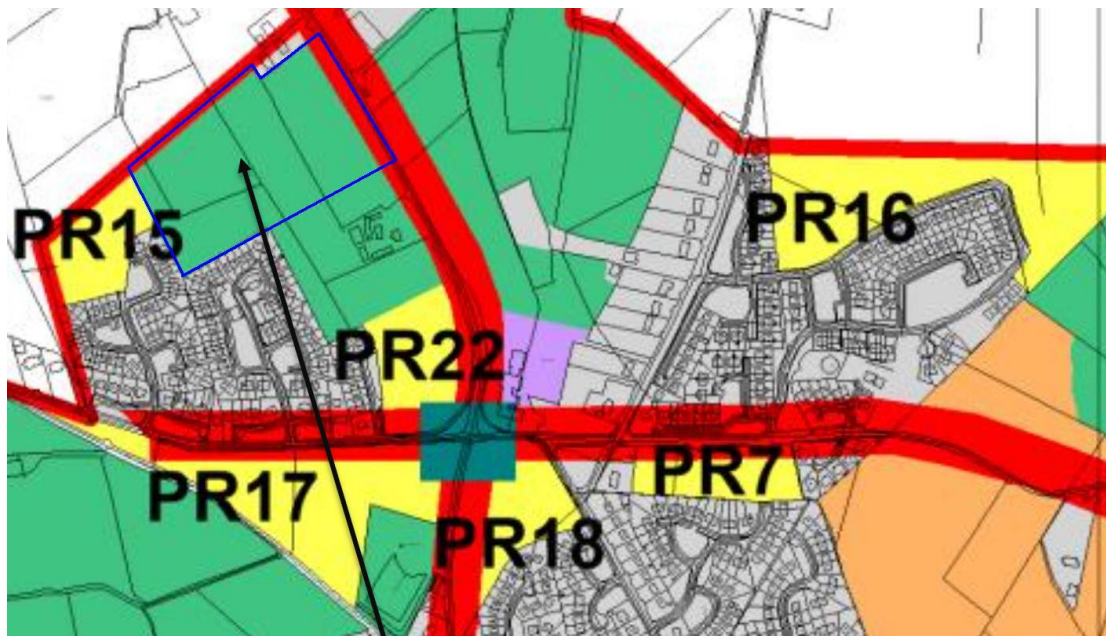
Chief Executive’s Response:

The contents of this submission have been noted and considered. The submission of the OPR raises concerns that Site PR22 is located in a peripheral location relative to the town centre and recommends that said site be rezoned from ‘Primarily Residential’ to either ‘Strategic Residential Reserve’ or ‘Agriculture’. This is reflected in **Recommendation 5, Section 6.2 of this report**, which recommends changing the zoning of Site PR22 from ‘Primarily Residential’ to ‘Strategic

Residential Reserve'. Having regard to this recommendation, the proposal to zone the lands outlined in blue on Fig. 15 would be inappropriate and contrary to the principles of compact growth. As regards Site PR15, it should be noted that the OPR has also recommended that this site be rezoned from 'Primarily Residential' to either 'Strategic Residential Reserve' or 'Agriculture' and again, this is reflected in **Recommendation 5, Section 6.2 of this report**, whereby a recommendation to change the zoning to 'Strategic Residential Reserve' is set out. In view of the foregoing, no changes to the zoning map are recommended on foot of this submission.

The second submission from **Joe Bonner on behalf of Cillanoir Developments Ltd.** relates to lands that are currently zoned as part 'Strategic Residential Reserve'/part 'Established Development' in the CDP 2018-2024 (as varied) – see Fig. 10 below. The submission notes that the subject lands are identified as 'Local Environment' in the Draft LAP as published but requests a rezoning to 'Primarily Residential' in the first instance or alternatively 'Strategic Residential Reserve'. The submission sets out a range of arguments in support of the proposed rezoning, including the planning history of the site and the need for viable alternative options for housing delivery in the town. The submission also references potential housing demand arising on foot of the war in Ukraine and the defective block issue in Co. Donegal. It is contended that a 'Local Environment' zoning would be inappropriate at this location.

Fig. 10 - Lands subject of residential submission by Joe Bonner on behalf of Cillanoir Developments



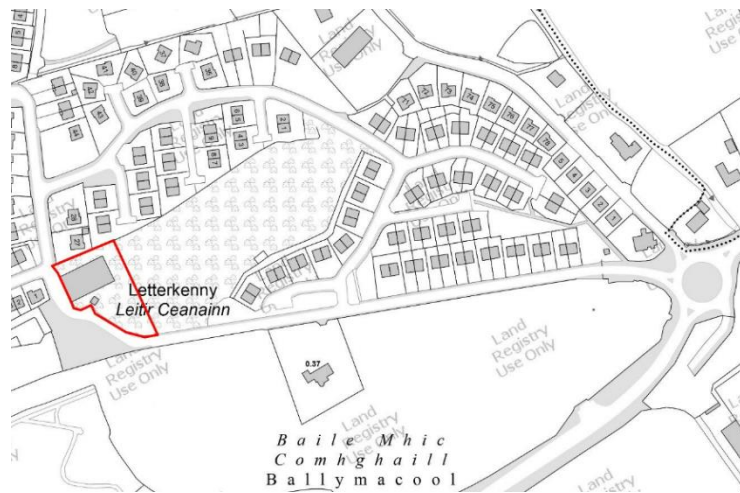
Chief Executive's Response:

The contents of this submission have been noted and considered. The subject lands are located in a peripheral location relative to the town centre and it is considered that the provision of a residential zoning at this location would be contrary to the principles of compact growth (in arriving at this conclusion regard is also being had to the comments of the OPR in respect of other proposed residential zonings in this area). In view of this consideration and having regard to the revised housing land supply targets recommended by the OPR, no changes to the zoning

map are recommended on foot of this submission - **see Recommendation 26, Section 6.2 of this report.**

In the Ballymacool area, a submission lodged by **Kenny Burke on behalf of Donal Gallagher** requests that lands to the south of No. 27 Ballymacool Wood be zoned 'Established Development' rather than 'Open Space' (see Fig. 11 below). The submission states that the lands in question are occupied by commercial/industrial buildings that do not contribute to the quality of the overall residential development at Ballymacool. The submission also notes that permission had previously been granted for 2 No. houses on the site in 1995.

Figure 11 - Lands at Ballymacool, subject of submission by Kenny Burke on behalf of Donal Gallagher

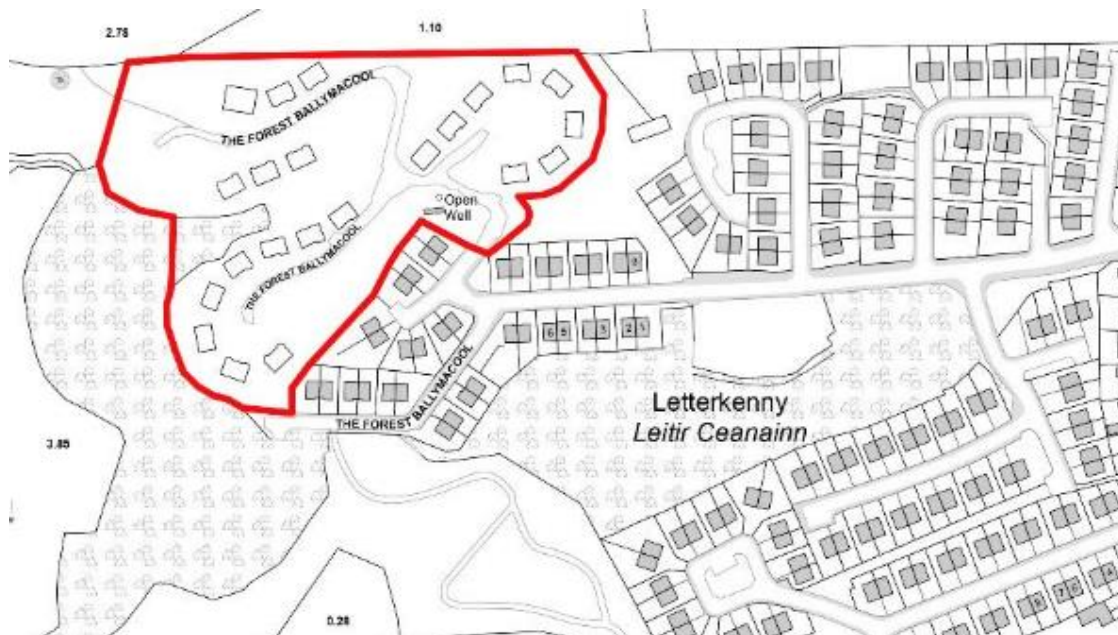


Chief Executive's Response:

The contents of this submission have been noted and considered. The subject lands are occupied by an unoccupied building that appears to have formerly used for commercial purposes. The buildings have fallen into a state of disrepair (see image extracted from Google Streetview above) and I would agree with the contention that these structures add little to the quality of the residential development at Ballymacool. On the basis that there is an existing building on the subject lands, a zoning of 'Established Development' is reasonable – NB it is recommended that the Established Development zoning be applied to the area of the existing building/development only, rather than to the entirety of the lands outlined in red on Fig. 18 (**see Recommendation 16 in Section 6.2 of this report**).

A second submission by **Kenny Burke on behalf of Donal Gallagher** expresses qualified support for the proposed zoning at the rear of numbers 9-16, 21-26 and 32-36 The Forest, Ballymacool, on the proviso that the extent of the 'Established Development' zoning is extended slightly westwards to incorporate all of the footprint of the unfinished housing development (see Fig. 12). The submission notes the planning history of the site for residential purposes and argues that the financial viability of completing the unfinished development on site rests on having certainty that the entire development could be completed and not be constrained by an 'Open Space' zoning on part of the lands.

Fig. 12 - Lands subject of second submission by Kenny Burke on behalf of Donal Gallagher, requesting that all lands outlined red be zoned as Established Development

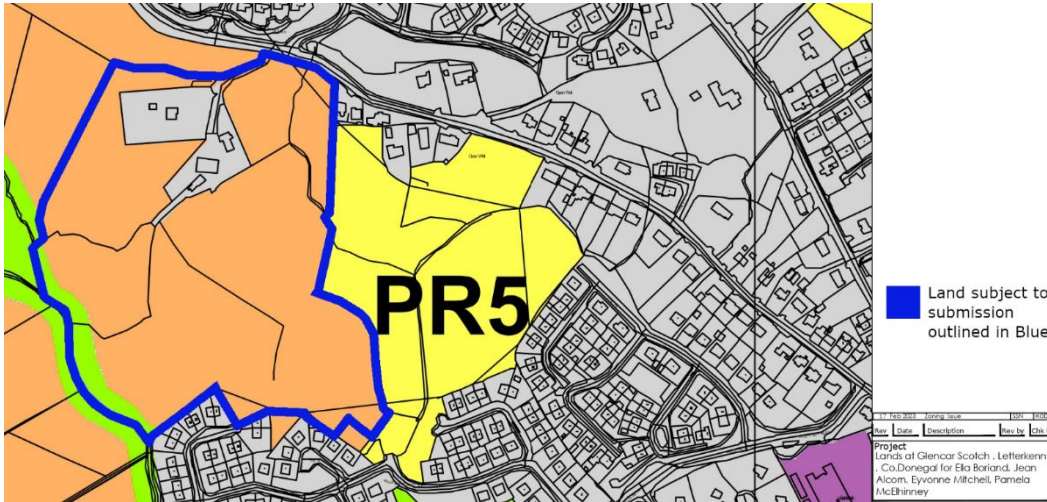


Chief Executive's Response:

The contents of this submission have been noted and considered. It is Council policy to seek the resolution of unfinished housing developments. The lands subject of the submission have been subject to previous building works for residential development and the proposal to allow for the completion of the entirety of the unfinished development on site is considered reasonable (NB – it should be noted that the proposal would involve a very limited area of additional 'Established Development' zoning at this location, over and above that identified on the initially published draft map – circa 0.2Ha). It is therefore recommended that the entirety of the lands outlined in red on Fig. 19 above be zoned as '#Established Development' (see **Recommendation 17 in Section 6.2 of this report**).

At Glencar, a submission lodged by **MH Associates on behalf of the Borland Family** requests that lands outlined in blue in Fig. 13 be zoned as ‘Primarily Residential’, in lieu of the part Strategic Residential Reserve/part Established Development zoning currently presented in the Draft LAP.

Fig. 13 - Lands subject of submission by MH Assoc. on behalf of the Borland Family



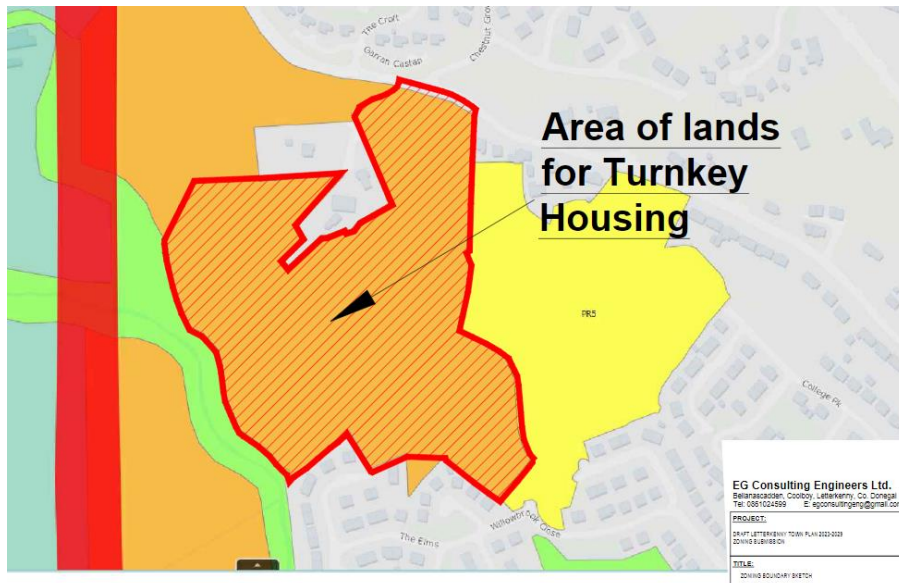
The submission notes that the lands are adjacent to lands zoned ‘PR5 Primarily Residential’, which have not been development under the current Development Plan to date and argues that the lands outlined in blue on Fig. 20 would facilitate the enhancement and consolidation of the development pattern in the area.

Chief Executive’s Response:

The contents of this submission have been noted and considered. Having regard to the revised housing land supply targets recommended by the OPR, the addition of another significant area of residentially zoned land cannot be justified at this location. The focus of the planning authority must be on the compact and sequential growth of Letterkenny and as such it is considered that it would be inappropriate to zone the subject lands as ‘Primarily Residential’ at this point in time. Accordingly, no changes to the zoning map are recommended on foot of this submission – **see Recommendation 27 in Section 6.2 of this report.**

A submission from **EG Consulting Engineers** (in respect of similar lands to the immediately preceding submission) requests a rezoning of lands at Glencar from ‘Strategic Residential Reserve’ to ‘Primarily Residential’ (see Fig. 14), noting that there are not enough houses being built for those who need social housing and further noting that the site is at an advanced stage of project development for the delivery of a turnkey scheme.

Fig. 14 - Lands subject of submission from EG Consulting Engineers



Chief Executive's Response:

The contents of this submission have been noted and considered. Having regard to the revised housing land supply targets recommended by the OPR, the addition of another significant area of residentially zoned land cannot be justified at this location. The focus of the planning authority must be on the compact and sequential growth of Letterkenny and as such it is considered that it would be inappropriate to zone the subject lands as 'Primarily Residential' at this point in time. Accordingly, no changes to the zoning map are recommended on foot of this submission - **see Recommendation 28 in Section 6.2 of this report.**

A submission by [Turley Associates on behalf of the Apex Housing Association](#) welcomes the zoning of 'Primarily Residential' site PR5 to the north/west of The Elms and Willowbrook and commits to engaging with Council to deliver sustainable residential development.

Chief Executive's Response:

The contents of this submission are noted.

Also in the Glencar area, a submission by [Joe Bonner on behalf of PJ McDermott](#) refers to lands that are currently identified in the CDP 2018-2024 (as varied) as 'Primarily Residential', but which are shown in the Draft LAP as 'Strategic Residential Reserve' (see Figs 15 and 16). The submission notes the planning history of the site (including a recent planning application for 87 units and consultations with the planning authority under the Large Scale Residential Development provisions of the legislation) and argues that the lands should not be dezoned, in accordance with Ministerial guidance, the provisions of the Development Plan Guidelines for Planning Authorities and the requirements of the Planning & Development Act 2000 (as amended).

Fig. 15 - Current zoning of PJ McDermott's lands at Glencar under the CDP 2018-2024 (as varied)

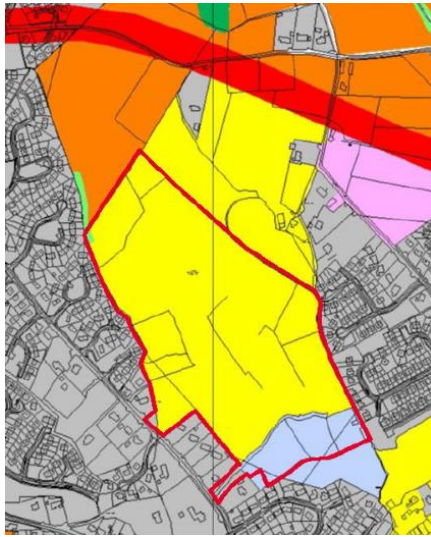
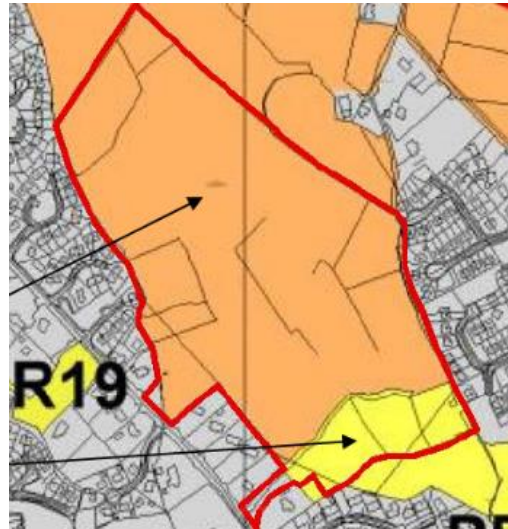


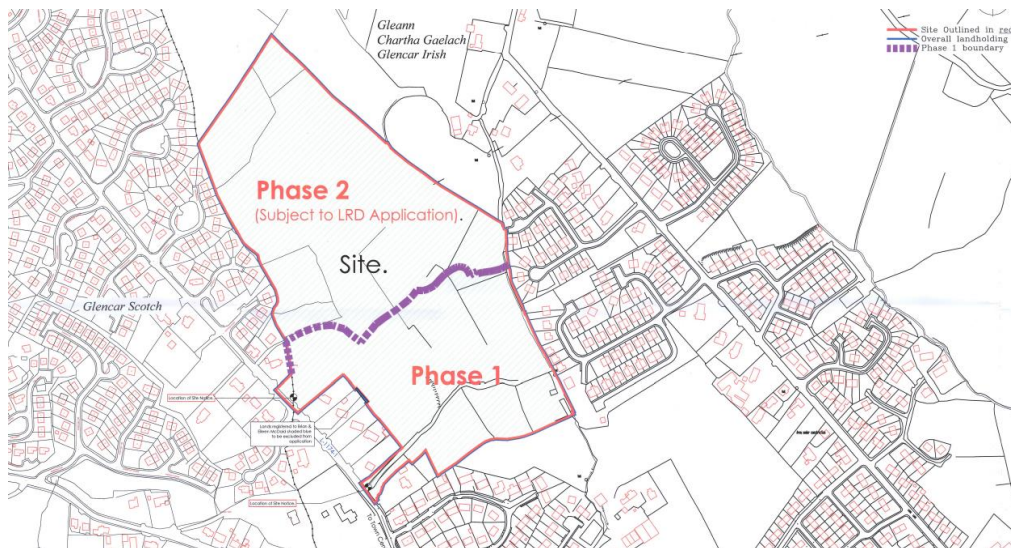
Fig. 16 - Proposed zoning under published Draft LAP



The submission goes on to set out a range of detailed arguments as to why the 'Primarily Residential' zoning should be retained as shown in Fig. 21 including, inter alia, considerations of servicing, population growth in the county, the impact of mica and the war in Ukraine.

Chief Executive's Response:

The contents of this submission have been noted and considered. As outlined in the submission, planning permission has recently been granted (planning ref. 22/51204) for 87 residential units on lands currently zoned part 'Primarily Residential' and part 'Education/Opportunity' (see map 1 below, area denoted as 'phase 1').



Map 1 - Area subject of permission for 81 units under planning ref. 22/51204 (area marked as Phase 1)

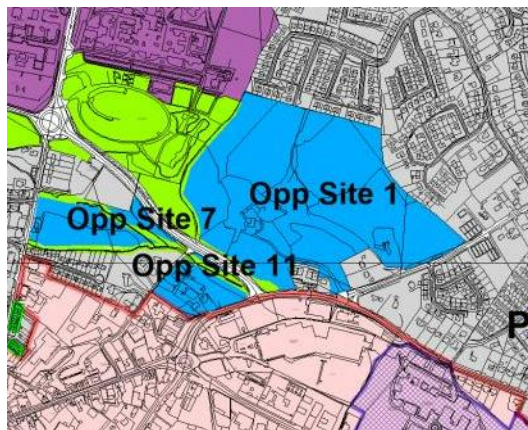
In addition to the 87 units permitted on the subject lands, the landowner in this instance has entered into discussions with the Council under the 'Large Scale Residential Development'

provisions of planning legislation, in respect of a further circa c.200 houses on the lands marked as Phase 2 on Map 1 above.

Whilst the current zoning of 'Primarily Residential' on the 'Phase 2' lands is acknowledged, as indeed are the provisions of the 'Development Plan Guidelines for Planning Authorities' (which state that 'zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning'), concerns nonetheless arise in relation to the servicing requirements for the overall extent of residential development planned at this location, particularly in relation to the need for the strategic 'northern relief road' to be delivered in order to facilitate the extent of development proposed on the 'Phase 2' lands. Concerns also arise in relation to the level of community facilities generally in Glencar and whether same are adequate to cater for an additional circa 300 dwellings (this latter point in something that has been raised by Members on numerous occasions during the preparation of the Draft LAP). On balance, and having regard to (i.) the existing dense concentration of residential development in the Glencar area; (ii.) the need to provide for balanced development throughout the town; (iii.) the revised housing land supply targets recommended by the OPR; and (iv.) the consideration that the northern relief road would be required to adequately cater for the traffic movements likely to be generated by c.300 dwellings at this location, it is recommended that the 'Primarily Residential' zoning at Glencar be revised to include the site subject of planning ref. 22/51204 (i.e. the area denoted as Phase 1 on Map 1 above) but that the remainder of the lands subject of the submission remained zoned as 'Strategic Residential Reserve' as per the originally published Draft LAP. These considerations are reflected in **recommendation 21, Section 6.2 of this report**.

In Gortlee, a submission by [Turley on behalf of the Robinson Family](#) welcomes the zoning of Opportunity Site 1 (see Fig. 17) but submits that the policy provision in the Draft LAP that restricts residential coverage on site to 50% of the site area could limit the potential yield on site. The submission requests that the restriction on residential site coverage be removed in its entirety or amended to allow for 75% residential coverage.

Fig. 15 - Location of Opportunity Site 1



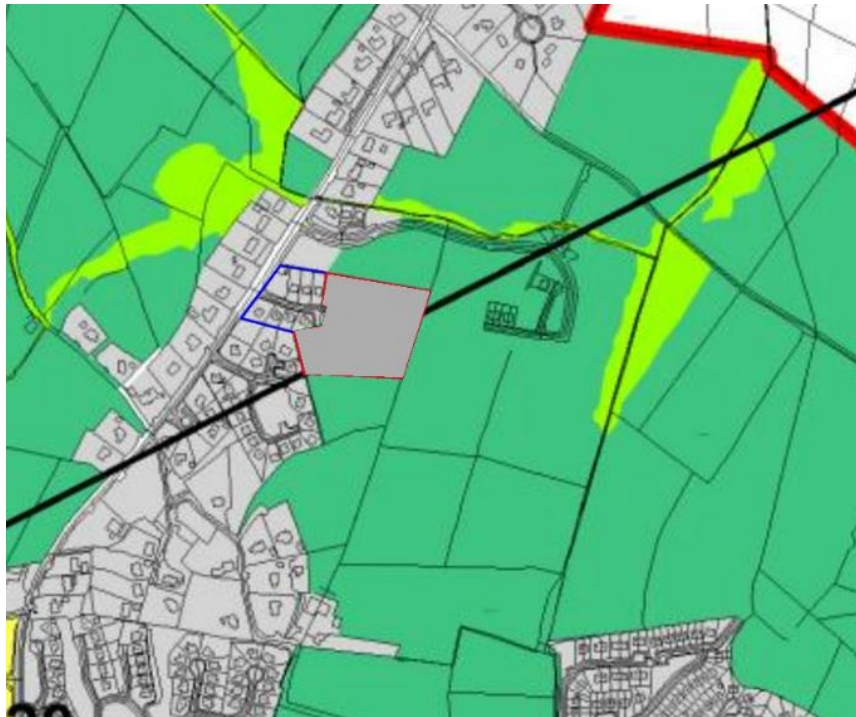
Chief Executive's Response:

The contents of this submission have been noted and considered. Recommendation No. 5 of the OPR submission recommends that the entirety of Opportunity Site 1 be rezoned as 'Primarily Residential'. The OPR's recommendation in this respect is considered appropriate given the

central location of the subject lands and this is reflected in **Recommendation No. 7, Section 6.2 of this report.**

At Lisnennan, a submission by **Joe Bonner on behalf of Rosemount Homes** refers to lands that are currently zoned as 'Strategic Residential Reserve' in the CDP 2018-2024 (as varied), but which are indicated as 'Local Environment' in the Draft LAP. The submission sets out arguments as to why a 'Local Environment' zoning would be inappropriate at this location including, inter alia, considerations of planning history (30 houses previously permitted), servicing, the provisions of the NPF and RSES and the brownfield nature of the site (it is contended that the land has been cleared and partially filled to facilitate the previously permitted development).

Fig. 16 - Location of lands at Lisnennan, subject of submission by Joe Bonner on behalf of Rosemount Homes



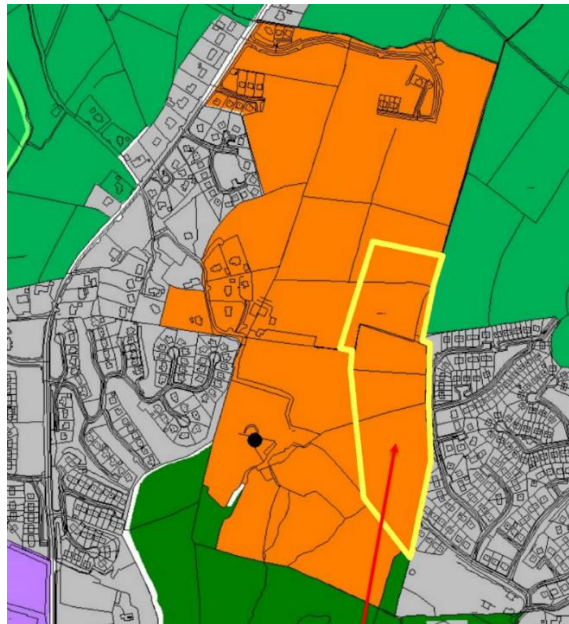
The submission requests that the land be zoned as 'Established Development' in the first instance or alternatively that the 'Strategic Residential Reserve' zoning (as set out under the CDP 2018-2024, as varied) be retained.

Chief Executive's Response:

The contents of this submission have been noted and considered. The subject lands are located in a peripheral location relative to the town centre of Letterkenny. Having regard to the imperative to pursue the compact growth of the settlement and to the revised housing land supply targets recommended by the OPR, it is considered that a residential zoning on the subject lands cannot be justified at this point in time. Accordingly, no changes to the zoning map are recommended on foot of this submission – **see recommendation 29, Section 6.2 of this report.**

Also in the Lisnennan area, a submission by **Joe Bonner on behalf of PJ McDermott** refers to lands currently zoned 'Strategic Residential Reserve' in the CDP 2018-2024, as varied (see Fig. 19), but which is designated as 'Local Environment' in the Draft LAP. The submission argues that 6.07Ha of the subject lands (see Fig. 19, lands outlined in yellow) should instead be zoned as 'Primarily Residential' and the remainder should be identified as 'Strategic Residential Reserve'.

Fig 17 - Current Strategic Residential Reserve zoning at Lisnennan as per CDP 2018-2024, with lands subject of PJ McDermott submission and proposed as 'Primarily Residential' outlined in yellow, with the remainder suggested for rezoning as 'Strategic Residential Reserve'



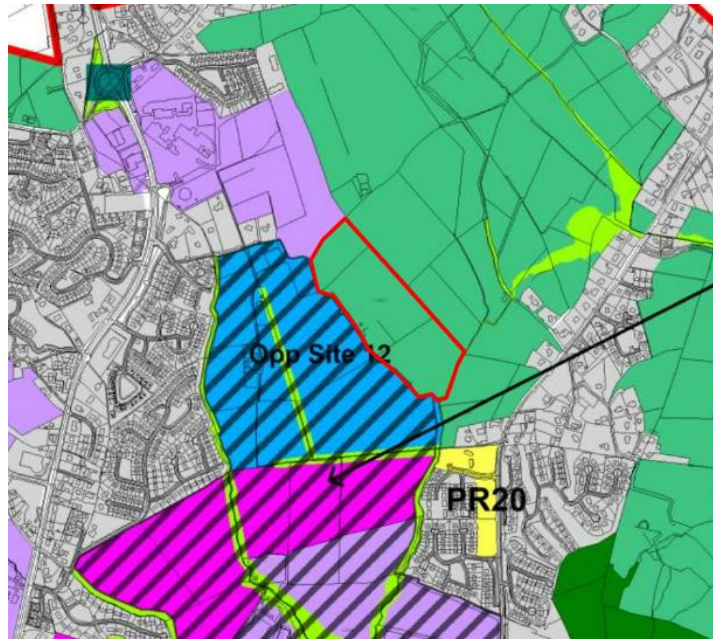
The submission contends that the proposed amendments would facilitate the short-term development potential of one part of the landholding, whilst the potential of the balance of the land could be realised when the LAP is updated to reflect revised housing and population projections emerging from Census 2022. Access to the proposed 'PR' lands would be via the Meadow Hill development. The submission notes that part of the subject lands have a planning history in respect of residential development and contends that a 'Local Environment' zoning would be inappropriate at this location. The submission sets out a range of arguments for the proposed rezoning, including national and regional policy, population projections and preliminary Census results, impacts from the war in Ukraine and mica and the proximity of the site to employment areas.

Chief Executive's Response:

The contents of this submission have been noted and considered. The subject lands are located in a peripheral location relative to the town centre of Letterkenny. Having regard to the imperative to pursue the compact growth of the settlement and to the revised housing land supply targets recommended by the OPR, it is considered that a residential zoning on the subject lands cannot be justified at this point in time. Accordingly, no changes to the zoning map are recommended on foot of this submission - **see recommendation 30, Section 6.2 of this report.**

A submission by **Turley on behalf of Magim Ltd.** refers to lands at Carnamuggagh. The submission notes that a forum was established between IDA Ireland, Atlantic Technological University and Magim Ltd, to agree a shared vision and development principles for this area, culminating in a *Common Design Principles* document which is appended to the submission. Magim Ltd. welcomes the zoning of Opportunity Site 12 on the Carnamuggagh lands but suggests a number of amendments to Policy LK-OPP-12 (which deal generally with the application of any masterplanning process and the need for agreement with other landholders) and further suggests that lands outlined in red on Fig. 20 below should be rezoned as ‘Strategic Residential Reserve’.

Fig. 18 - Location of lands subject of submission by Turley on behalf of Magim Ltd., with lands proposed as Strategic Residential Reserve outlined in red



The submission notes that the RSES formally recognises the lands at Carnamuggagh as an area where existing neighbourhoods should be consolidated and that Uisce Éireann has recently completed sewer upgrade works in the locality.

Chief Executive’s Response:

The contents of this submission have been noted and considered. With regard to Opportunity Site 12 as initially identified in the Draft LAP, recommendation No. 5 of the OPR submission recommends that Opportunity Site 12 be rezoned from ‘Opportunity Site’ and ‘masterplanned approach’ to ‘Strategic Residential Reserve’. The recommendations of the OPR in this respect are agreed and this is reflected in **Recommendation 10, Section 6.2 of this report.**

With regard to the proposal to designate additional ‘Strategic Residential Reserve’ lands it is considered (having regard in particular to the recommendation in respect of Opportunity Site 12 and to the peripheral nature of the subject lands generally), that the proposal to zone the area of land outlined in red on Fig. 20 as ‘Strategic Residential Reserve’ could not be justified at this point in time - **see recommendation 31, Section 6.2 of this report.**

A submission from **ATU** welcomes the Draft LAP as a means of progressing the positive, proactive and forward-thinking planning of Letterkenny. The submission sets out a number of comments, both at a strategic and detailed level. In terms of housing, ATU support Objective LK-H-O-1 and the specific reference to student housing and suggest that a specific policy should be incorporated into the LAP to specify the uses that will be considered on the 'Strategic Community Opportunity' lands at Knocknamona, inclusive of student accommodation.

Chief Executive's Response:

The contents of this submission have been noted and considered. The uses that are considered acceptable in principle on lands zoned 'Strategic Community Opportunity' are set out in the zoning matrix' contained in Table 7.2 of the Draft LAP. In addition, the narrative of the Draft LAP further clarifies that 'Proposals for land-uses that are not specifically identified on the zoning matrix may also be considered where the proposed use does not materially contravene the relevant zoning objective, and...subject to compliance with the wider policy framework contained in both this Plan and the CDP where relevant, and relevant guidelines'. As such, it is not considered necessary to include a further objective pertaining to uses on the subject lands. As already noted in Section 5.2 of this report, the OPR accept as reasonable the proposal that student accommodation be accommodated on the 'Strategic Community Opportunity' lands, but make an observation to the effect that any such accommodation should be located on the southernmost section of the site, which would better facilitate active travel and compact growth (Observation 1i. of the OPR submission). The recommendation of the OPR in this respect is agreed and this is reflected in **Recommendation No. 18, Section 6.2 of this report.**

A submission from the **Sweeney family** refers to a number of parcels of land at Leck, Lismonaghan and Oldtown (including, inter alia, sites PR9 and PR11) and requests clarification from the Council in terms of access, particularly in light of the potential for significant road works in the area. With regard to site PR9, the submission notes that there is inadequate access to connect to this land from the existing Leck Road and states that this must be reconsidered as a priority to allow greater access. The submission notes the provisions of Draft policy relating to site PR9, which would require developers to construct a new roadway along the southeastern boundary of the site to facilitate vehicular access (i.e. access would have to be taken from the new road rather than from the Leck Road).

Chief Executive's Response:

The contents of this submission have been noted and considered. The sustainable development of lands at Leck is to a large extent dependent on the delivery of upgraded roads infrastructure and in some instances may also require sewerage infrastructure works (e.g. pumping infrastructure is likely to be required in respect of site PR as identified in the Draft LAP). Having regard to these infrastructural deficits and to the revised housing land supply requirements recommended by the OPR, it is considered that a number of PR sites to the south of Leck Road (namely sites PR9, PR10 and PR11) should be rezoned from 'Primarily Residential' to 'Strategic Residential Reserve'. **This is reflected in recommendation No. 12 of Section 6.2 of this report.**

5.3 Town Centre/Regeneration

Submissions in relation to the town centre covered a wide range of issues – these are summarised below.

As already noted in Section 5.2, Observation No. 2 of the OPR submission advises that the planning authority should review and amend the extent of land zoned Town Centre, with a view to consolidating the town centre lands into a more manageable, prioritised town centre area and providing for residential development, in particular on appropriate centrally located sites conducive to active travel modes.

Chief Executive's Response:

The observation of the OPR as regards the extent town centre land is noted. The town centre area, as defined in the Draft LAP, has recently been subject to extensive study as part of the Letterkenny 2040 Regeneration Strategy, which sets out comprehensive proposals for the regeneration of the town centre and under which significant funding has been awarded to progress significant regeneration works. The regeneration strategy has considered the town centre (as designated in the LAP) as a 'whole' and it is vitally important for the delivery of the strategy that the study area (i.e. the town centre boundary) is not altered at this point in time. Accordingly, no changes are recommended in respect of the town centre boundary. As regards residential development in the town centre, Members will have already noted the commentary in relation to housing land as set out in Section 5.2 above, which proposes an allocation of 300 residential units in the town centre over the lifetime of the LAP, a figure that would add greatly to the vitality and vibrancy of the town centre area.

A submission made on behalf of **PJ Callaghan** raises concerns in relation to the potential for proposals contained within the non-statutory 'Letterkenny 2040' project to be incorporated into the statutory LAP. It is contended that any attempt to do so should be subject to a new period of stakeholder consultation with associated environmental impact assessments. It is further contended that there should be no restriction on the development of Mr. Callaghan's town centre lands, over and above that ordinarily applied to the town centre. The submission raises further issues in relation to a potential town centre 'greenway' and town centre flooding – these matters are dealt with in the in transport and flooding sections below.

The submission from the **ESB** welcomes the ambition of the Town Centre Strategy set out in Chapter 9 of the Draft LAP and supports the provision of additional innovation space and employment in the town centre through the Council's development of the new Alpha and Beta Business, Enterprise and Innovation Centre on the former ESB yard site and adjoining lands. These comments are noted and welcomed.

A submission from **O'Connor Burke Architecture on behalf of Mr. Connor McGettigan** expresses qualified support for the proposed zoning of site at the junction of Paddy Harte Road and Pearse Road (fig. 1 refers). Whilst the town centre zoning is supported, concern is expressed that any open space zoning adjacent the river would exceed 7.0 metres in depth (the submission notes that it is not possible to measure the exact dimensions of the open space zoning on the land use zoning map).

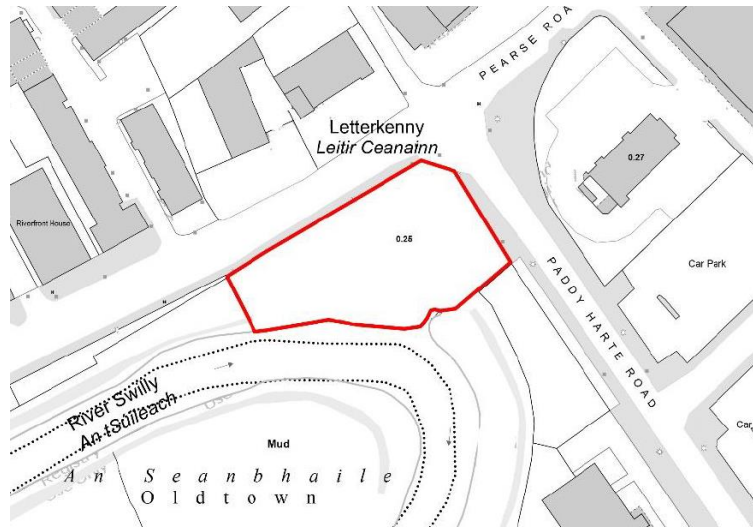


Fig. 19 - site subject of submission from O'Connor Burke Architecture on behalf of Connor McGettigan

The submission states that the landowner and his agents are at the final stages of preparing a planning application for a Turnkey residential development of apartments (in consultation with the Council's Housing Dept. and the OPW) that accords with the current development plan provisions in the County Donegal Development Plan 2018-2024 (as amended), including the reservation of a riverside walk area of 7.0m depth. It is contended that any open space zoning must be limited to 7.0m depth, otherwise it will not be feasible to provide a landmark building on this site nor achieve the higher order ambitions of the draft plan for this important town centre site. The submission also makes reference to town centre car parking standards.

Chief Executive's Response:

The contents of this submission have been noted and considered. However, the matters raised therein are considered to constitute matters of detail that would be more appropriately addressed through the Development Management process. No recommendations in respect of the content of the Draft LAP arise on foot of this submission.

A submission made by **Turley on behalf of Hurley Property ICAV**, for and on behalf of its sub fund National Property Fund relates to lands identified in Fig. 2 below.



Fig. 20 - Extract from LK 2040 (Annotated by Turley)

The submission welcomes the ‘evolved’ development ambition for the subject lands contained in the Letterkenny Regeneration Strategy 2040 and seeks to ensure that the LAP aligns with the emerging development ambition for the subject lands. The submission notes that the Draft LAP indicates an ‘indicative active travel route’ that appears to cut through the subject lands (see Fig. 3) and request that DCC review this route to ensure it does not unintentionally constrain development opportunities.



Fig. 21 - Extract from draft zoning map (Annotated by Turley)

The submission welcomes objectives and policies that will help to improve the overall attractiveness and health of the town centre, but notes that excessive or restrictive design and development requirements can have detrimental impacts; hence a sensible and flexible approach in this regard is requested.

Chief Executive's Response:

Whilst the future phase of this commercial/retail development as described in the submission is considered appropriate in this town centre location, the provisions for future active travel walking and cycle connections proposed as part of the LK Green Connect public realm scheme is an important aspect of the Letterkenny 2040 Regeneration strategy. Connectivity, permeability and public realm are essential components of the Governments Urban Regeneration and Development Fund (URDF) of which acquisition and construction of phase 1 of the LK Green connect has been funded under and is due to complete in April 2023. The landowners' submissions relating to the possible conflict and constraining of future development opportunities are noted, however the possible future route of the further phases of LK Green Connect will remain on the Land use zoning map and any subsequent planning application in the vicinity of same shall have regard to same. It is recommended to amend the land use zoning map description from 'Indicative Active travel route – to 'LK Green Connect' and this is reflected in **Recommendation No. 1, Section 6.3 of this report.**

The submission from **Donegal ETB** notes that the organisation is a significant economic entity in the Letterkenny area and is currently finalising a further education and training estates strategy which would involve a flagship building in Letterkenny town centre, which could potentially be done collaboratively with ATU or on a new standalone site. The submission makes reference to Page 24, Section 8.1.2 of the Draft Plan, which deals with the ATU and its collaboration with other educational institutions. These comments are noted.

The submission from **ATU** fully supports the economic emphasis placed on the town centre and further supports the ambitions to address vacancy / dereliction, support town centre living and enhance the quality of the public realm. The submission notes that ATU own lands south of the Port Road that are crucial to expansion plans and request that said lands be annotated with a hatching similar to that applied to the main campus buildings. The ATU raise concerns in relation to the indicative 'Developer Led Road' that runs from the Neil T. Blaney Road to the Port Road and argue that this road line fails to align with the LK 2040 Regeneration Strategy and passes through an area of flood risk – ATU request that the indicative road line be removed from the land-use zoning map (**this is dealt with in Section 5.8 below**).

5.4 Flooding and Surface Water Management

The submission from the **OPW** notes that it is the lead agency for flood risk management in Ireland. The submission provides a number of specific comments in relation to the Strategic Flood Risk Assessment (SFRA) that accompanies the Draft LAP.

Firstly, the OPW note that Section 5.7.1 of the SFRA states that the "flood zones only account for inland flooding". However, in line with the Planning System and Flood Risk Management Guidelines, Flood Zones should account for fluvial and coastal flooding.

The justification tests supplied in the SFRA are welcomed but the OPW advise that there are a number of zonings which allow for highly vulnerable development in Flood Zones A and B, for which no commentary has been included to indicate that they have been assessed against the plan making justification test. The submission includes a table setting out areas where the OPW consider further justification tests will be required (see tables set out under Fig. 4 below, which have been reproduced from OPW submission). The OPW advise that, where already developed lands do not meet the criteria of the Plan Making Justification Test it should be noted that they have not passed, and a policy objective could be attached to the zoning to limit development to

that as outlined in section 5.28 of the Guidelines (e.g. extensions, small-scale infill development etc.).

Figure 22 - Tables reproduced from OPW submission, detailing areas where further justification and commentary is recommended in respect of flood risk

Map 4				
Zoning	Allowed Usage Vulnerability	Flood Zone	Location	Developed?
Established Development	High	A and B	Old Town	Yes
Town Centre	High	A	Century Complex	Yes
Town Centre	High	B	Dunnes Stores	Yes
Town Centre	High	B	South of Charles Kelly Ltd Builders Providers	Yes
Map 6				
Zoning	Allowed Usage Vulnerability	Flood Zone	Location	Developed?
Community Education	High	A and B	Letterkenny University Hospital	Yes
Established Development	High	A and B	North of Opportunity Site 7	Yes
Established Development	High	A	West of Opportunity Site 7	Yes

Town Centre	High	A and B	Tesco	Yes
Town Centre	High	A	Between Tesco and Aldi	No
Town Centre	High	B	Atlantic Technological University	Includes undeveloped

Map

Zoning	Allowed Usage Vulnerability	Flood Zone	Location	Developed?
Town Centre	High	A	At Motor Tax Office	Yes
Town Centre	High	A	South of Motor Tax Office	No

Town Centre	High	B	Radisson Area	Yes
Existing Development	High	B	South of Letterkenny Skip Hire	Yes
Existing Development	High	A and B	Adjacent to Kellys Toyota	Contains undeveloped lands in Flood Zone B

Map 8

Zoning	Allowed Usage Vulnerability	Flood Zone	Location	Developed?
Existing Development	High	A and B	Educate Together School enclosed by Opportunity Site 3	Yes
General Employment	Less	A	South of Opportunity Site 3	Includes undeveloped
Community Education	High	B	Letterkenny Recycling Centre	Yes

Map 11

Zoning	Allowed Usage Vulnerability	Flood Zone	Location	Developed?
Existing Development	High	A	Between Bunagee and Milk Isle	Yes
General Employment	Less	A	Donaghy Motorhomes	Yes

Existing Development	High	A	Clanree hotel	Yes
General Employment	Less	A	North of Coyle Welding	No
Existing Development	High	B	South of Letterkenny Glass	Yes

The OPW submission raises a concern that the Established Development zoning, in areas such as the lands adjacent to the Swilly River opposite Mount Errigal Hotel, lands in Bonagee at the Clanree Hotel and at the Applegreen filling station, would allow in principle for highly vulnerable usage such as residential. Similarly, concerns are raised that the 'town centre' entry on the zoning matrix indicates that lands may, in principle, be developed for highly vulnerable uses – which would not be acceptable in areas of Flood Zone B without first having passed the required justification test.

The OPW reference Section 6.3.3.1.2 of the SFRA - 'Opportunity Site 7', which states that "Opportunity Site' is a less vulnerable land use. However, the OPW note that the commentary on this site in the written statement, and policy LK-OPP-P-7 allow for highly vulnerable usage such as residential in this zoning.

In relation to Opportunity Site 11, the OPW note that a potential need to restrict development on this site (as referred to in Section 6.3.3.1.3 of the SFRA) has not been reflected in the policy applicable to the lands – Policy LK-OPP-11. It is further stated that the discussion in Part 3 of the Plan Making Justification Test carried out with respect to this zoning deals mainly with the potential for increased risk elsewhere, and does not propose specific structural or non-structural mitigation measures for flood risk at the site itself.

The OPW welcomes the guidance in section 4.4.3 of the SFRA relating to the assessment of proposals for highly vulnerable development and suggests that consideration be given to incorporating this guidance into the plan as a policy objective.

The OPW state that no commentary has been provided on the Arterial Drainage Scheme maintained by the OPW within the extents of Letterkenny and suggest that Donegal County Council should consider including the requirement for access for maintenance as a policy objective in the LAP.

The OPW welcome the development of a pluvial flood model for Letterkenny, as contained in the SFRA, and further welcome policies supporting green and blue infrastructure, amenity corridors, natural biodiversity and wetlands systems and the use of SuDS. It is suggested that the SFRA should contain guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and that the SFRA should identify where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. OPW state that reference should be

made to the “Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas -Water Sensitive Urban Design -Best Practice Interim Guidance Document (2021)”.

As regards climate change, the OPW note that the allowances for increases in river flows and rainfall depths as set out in the SFRA do not tally with the mid-range and high-end future scenarios projected by the OPW and advise that planning authorities need to consider climate change impacts in the preparation of plans as opposed to considering such impacts at the planning stage of development.

The OPW submission concludes by listing a number of errata in the SFRA document (incorrect website addresses etc.).

On the topic of flood risk management, the **OPR** submission notes that much of Letterkenny, by reason of location and topography, is highly vulnerable to flood risk and that these risks are increasing due to the effects of climate change. The OPR welcomes the preparation of the SFRA for Letterkenny but states that, contrary to Guidelines, the plan-making justification test has not been carried out and passed for several proposed land use zonings within flood risk zone A or B that would accommodate vulnerable or highly vulnerable uses or development types. The OPR is also concerned that the SFRA does not align fully with the Mid-Range or High-End Future Scenario set out by the OPW. Recommendation 14 of the OPR submission requires that the planning authority review and amend the SFRA, including carrying out justification tests for all lands proposed to accommodate development vulnerable to flooding and omitting or appropriately amending zonings that do not meet the requirements of the justification test. In relation to surface water management (and as already noted at Section 5.1 above), the OPR also recommends (Recommendation No. 15 of the OPR submission) that additional detail be incorporated into the LAP to ensure that Sustainable urban Drainage Systems (SuDS) and nature-based solutions to surface water management are implemented consistently throughout the town and further recommends that policies LK-TC-P-05, CAM-LK-P-2, CAM-LK-P-6 and LK-NBH-P-1 of the LAP are reviewed in this regard.

The submission from the **NWRA** notes the existence of potential flood risk in Letterkenny town centre and recommends that zoning objectives and policies for the town centre area be amended to reflect that only developments that are ‘water compatible’ will be permitted on undeveloped lands within Flood Zone A areas. Where the lands in Flood Zone A are already developed, the Assembly recommends that a restriction be placed on the extension of buildings beyond the current footprint, unless accompanied by a detailed site specific flood risk assessment which can identify appropriate compensatory measures that show no increase in flooding elsewhere. The submission states that these amendments are necessary to comply with RPO 3.10 of the RSES and present an opportunity to deliver quality green infrastructure within the Regional Growth Centre as envisaged within RPO 35.

A submission from **Paul Callaghan on behalf of PJ Callaghan** advises, inter alia, that the CFRAM study maps are at the core of all flood planning in Ireland and that the OPW themselves highlight that these maps are only estimates of what might happen in terms of a major flood event, over a multi hundred-year timeframe. The submission notes that lands adjacent to the Callaghan lands are not marked on the CFRAMs maps, solely because they have already been developed. The submission contends that other lands (such as the retail park and traveller halting site) would be impacted before the Callaghan land in the event of a 1:100/1:200 flood event that caused the Swilly to burst its banks and that the same principle apply to coastal flooding. The submission notes the OPW’s plans for a flood relief scheme to protect parts of the town centre area and contends that the OPW look more favourably on planned development

when 'hard' protection measures are implemented. The submission refers to flood protection measures that have been implemented in Dublin City and in the Netherlands and notes that flood prone areas have been designated for development in Waterford City, on the basis of the compact growth agenda and the delivery of appropriate flood defences. It is contended that the same rationale should apply to Letterkenny town centre to allow for a more productive land use than that envisaged under the Letterkenny 2040 proposals. The submission also makes reference to the potential use of CPO powers by the Local Authority in respect of town centre lands.

Chief Executive's Response:

The content of the foregoing submissions has been noted and considered. The Council has engaged a firm of consulting engineers to assess potential flood risk in Letterkenny (RPS Consulting Engineers). As regards the town centre area, the advice from RPS to this Council (following detailed flood modelling exercises) is that "the entire Town Centre zoning is not going to pass the Development Plan Justification Test for any undeveloped sites that are within flood zone A and to comply with the Planning System and Flood Risk Management Guidelines it will be necessary that these sites are zoned as for Water Compatible uses only" (SFRA Report Section 6.3.2.3). Notwithstanding this advice, Members resolved to publish the Draft LAP without any restriction on development in areas of potential flood risk in the town centre. The submissions from the OPR, OPW and NWRA all now reference the need for justification tests to be carried out for all lands proposed to be zoned to accommodate development vulnerable flooding, including the town centre. However, as regards the town centre area, Members are advised that there has been no material changes in circumstances in the period since the publication of the Draft LAP and consequently the advice from RPS in relation to the town centre is unlikely to change. Hence, **Recommendation 1 of Section 6.4 of this report therefore reflects the need to restrict development in town centre areas at significant risk of flooding (in particular the town centre areas east of the Isle Burn and south of the Neil T. Blaney Road).**

In relation to OPW flood defences, Members are advised that the OPW has previously advised this Council that such defences are designed to protect *existing* development in areas of flood risk, rather than to open up areas of flood risk to vulnerable development.

It is noted that the OPW in particular has requested that a number of additional plan-making justification tests be carried out, on areas inside and outside the town centre. Furthermore, the OPW has advised that the climate change scenarios outlined in the SFRA do not tally with those used by the OPW. In light of these comments, it will be necessary to revert to RPS Consulting Engineers (the consultants that prepared the Strategic Flood Risk Assessment in support of the Draft LAP), review the Strategic Flood Risk Assessment and prepared additional justification tests as necessary (**see Recommendation 2 under Section 6.4 of this report**).

Members are advised that the review of the SFRA is likely to result in further recommended material alterations to the land use zoning map, land use zoning matrix, policies and objectives of the Draft LAP – full details in this regard will be presented to Members prior to the publication of any such material alterations.

OPW and OPR recommendations regarding the need for references to the Department of Housing, Local and Heritage publication entitled 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Water Sensitive Urban Design' are noted and considered reasonable. It is considered that relevant policies and narrative of the Draft LAP should be updated in this respect (**see Recommendation 3 in Section 6.4 of this report**).

The OPW has noted that the Draft LAP does not contain commentary in respect of the Arterial Drainage Scheme maintained by the OPW within the extents of Letterkenny and has suggested that the Council should consider including the requirement for access for maintenance as a policy objective in the Plan. Whilst these comments are noted, it is generally considered that matters in relation to OPW's requirements for access to the banks of the Swilly are outside the scope of the LAP and are matters to be addressed by the OPW in consultation with relevant landowners.

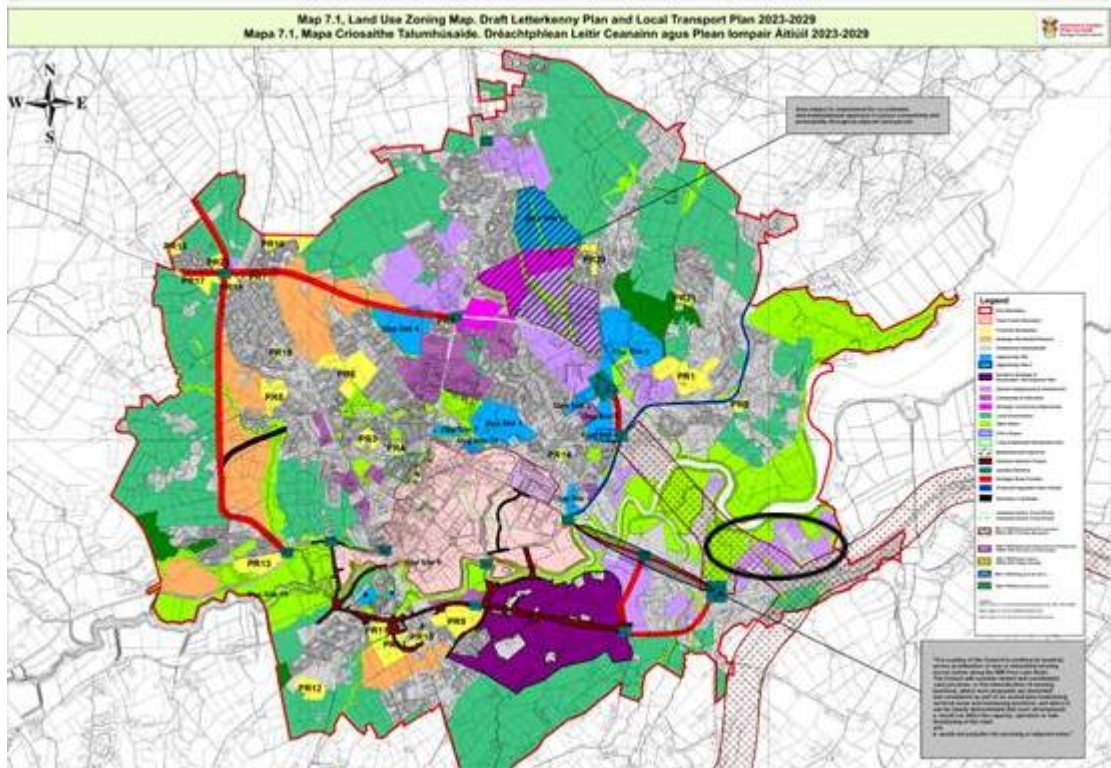
As regards the comments in the Callaghan submission regarding the use of CPO powers by local authorities, the CPO process is distinct from the LAP process and accordingly is not addressed further herein.

5.5 Commercial submissions on lands outside of Town Centre

The submission from the **OPR** (under point 8.2 and Recommendation 13 therein) welcomes the rationalisation of general employment lands south of the River Swilly having regard to flood risk lands and the road alignment of the TenT Route. The OPR suggests that there remains a considerable amount of greenfield lands zoned for this use which is inconsistent with NSO that deals with 'Compact growth'. The OPR expresses concern that there remains significant proposed zoned lands which conflict with the indicative route of the Ten-T PRIP and thereby conflict with the National Roads Guidelines for the protection of alignments for future national roads projects. Whilst this was a measure to provide for dual zoning during the early stages in the process the OPR's concerns are noted.

Chief Executive's Response:

The contents of this submission have been noted and considered. Having regard to the compact growth imperative and the necessity of delivering the TEN-T scheme, the recommendation of the OPR is agreed. It is recommended to change the 'General Employment and Commercial' land use zoning as contained in the ellipse on the map below from general employment to 'Open Space' – **this is reflected under Recommendation 1 of Section 6.5 of this report.**



Eamon and Drew Blaney request a rezoning of their lands at Mountain Top (see Fig. 25) from ‘Established Development’ to ‘Commercial’ and contend that said lands are not suitable for residential development given the established commercial nature of the area and the proximity of the lands to the N56.



Fig. 25 Eamon & Drew Blaney

Chief Executive’s Response:

The contents of this submission have been noted and considered. It is acknowledged that the Mountain Top area of the town contains a wide range of uses, encompassing residential and an array of commercial uses. In light of the requirements for compact growth and the revised housing land supply targets recommended by the OPR, I do not envisage any significant levels of residential development occurring on the subject lands. The lands may however lend themselves to the development of uses that are complimentary to the established service centre at Mountain Top. Accordingly, the proposal to rezone the lands as ‘General Employment and Commercial’ is considered reasonable and this is reflected in **Recommendation No. 2, Section 6.5 of this report.**

In the Bonagee area, a submission lodged by **MH Associates on behalf of John Crossan & Sons (Letterkenny) Ltd.** requests that lands proposed to be zoned as ‘Open Space’ instead be rezoned as ‘General Employment’ (see Fig. 11 – lands outlined in blue). It is contended that the proposed rezoning would reflect the current zoning in the CDP 2018-2024 (as varied) and would allow for the future expansion of the John Crossan Business Park.

Fig. 23 - Lands subject of submission from MH Assoc. on behalf of John Crossan & Sons

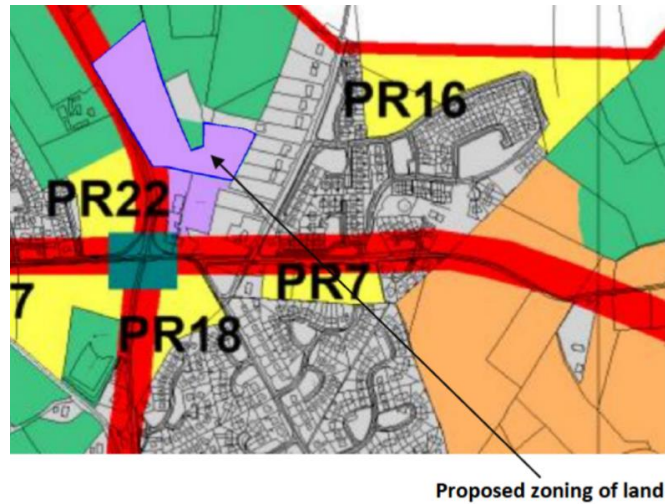


Chief Executive’s Response:

The contents of this submission have been noted and considered. The subject lands have been identified within the Strategic Flood Risk Assessment as being within flood zone A. To consider allowing ‘less vulnerable’ uses on the subject lands, the provisions of the ‘Justification Test for Development Plans’, as set out in the ‘Planning System and Flood Risk Management Guidelines’, require that one would have to be satisfied, inter alia, that the lands are essential to facilitate regeneration and/or expansion of the centre of the urban settlement, are essential in achieving compact and sustainable urban growth and that there are no suitable alternative lands for the particular use or development type in areas at lower risk of flooding. In this instance, it is not considered that the subject lands would satisfy the provisions of the justification test, primarily on the basis that there are alternative lands for business use within the plan boundary area that are free from potential flood risk. Accordingly, no changes to the zoning map are recommended on foot of this submission – **see Recommendation 3 of Section 6.5 of this report.**

A submission lodged by **Joe Bonner on behalf of Cillanoir Developments Ltd.** requests a rezoning of lands immediately north of the existing Costcutter/Applegreen (see Fig. 27) from 'Local Environment' to 'General Employment and Commercial'.

Fig. 24 - Lands subject of commercial submission by Joe Bonner on behalf of Cillanoir Ltd.



The submission states, inter alia, that the lands are currently zoned 'Commercial' in the CDP 2018-2024 (as amended) and notes that there was a previous permission for commercial development on part of the lands. The submission argues that the lands are brownfield, have been substantially cleared of vegetation and are not compatible with a 'Local Environment' zoning. The submission states that all required services are available and that the local bus passes the site. The submission also refers to a current planning application on site (ref. 22/51785) for commercial development.

Chief Executive's Response:

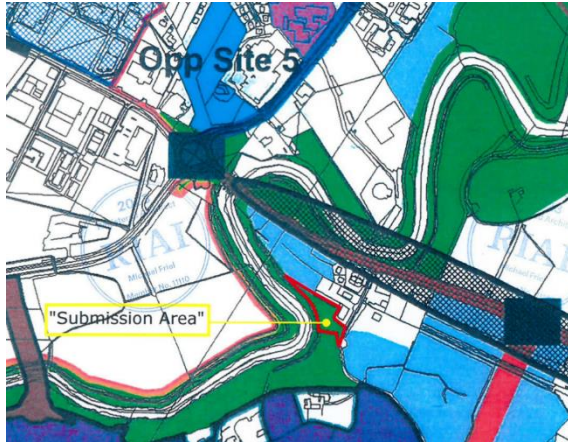
The contents of this submission have been noted and considered. The subject lands are located in a peripheral location relative to the town centre and it is considered that the expansion of commercial development at this location would be contrary to the principles of compact growth and is likely to have adverse impacts on the commercial viability of more centrally located areas. Accordingly, **no changes to the zoning map are recommended on foot of this submission - see Recommendation 4 of Section 6.5 of this report.**

With regard to planning application ref. 22/51785 as referenced in the submission (an application for, inter alia, 2 No. commercial buildings and associated site works) Members are advised that the planning authority issued a decision to refuse permission for said development on 16/02/23, on the basis that the proposal would be premature having regard to the status of the Draft Letterkenny LAP and the 'Local Environment' zoning applied to the subject lands in the Draft. That decision is now subject of an appeal to An Bord Pleanála.

A submission by [Michael Friel on behalf of Desmond Shiels](#) requests that a specific site be rezoned from Open Space to General Employment and Commercial.

Chief Executive’s Response:

The site (see image on left below, lands identified as ‘submission area’) is currently undeveloped. It is identified as being within Flood Zone A; the image below right illustrates the extent of flood zone A in the ‘High End Future Scenario. Development of a General Employment/Commercial at this location, albeit a ‘less vulnerable use’, would be inappropriate having regard to the provisions of the ‘Planning System and Flood Risk Management Guidelines’ and would fail to pass the ‘plan-making justification test’ on the basis, inter alia, that there are suitable alternative lands for the particular use or development type, in areas at lower risk of flooding.



Recommendation: No change to the Draft Land Use Zoning Map - see Recommendation 5 of Section 6.5 of this report.

A submission from [Patrick Dorrian](#) requests the re-zoning of lands at Glencar from Open Space to General Employment and Commercial

Chief Executive’s Response:

This site is zoned as Open Space in the draft LAP and is immediately adjacent to Glencar shopping centre. Detailed drawings accompanying the submission include detailed proposals for the development of this site (prepared in conjunction with council officials) that shall provide for: improved access (including disability access) into the site, improved junction arrangements and improved permeability for walking and cycling, including pathways into and within this site.

Members will note that the disposal of Council lands subject of this submission is a reserved function for the elected Council.

Recommendation: the area delineated on the submission and as outlined orange on the image below, be zoned as ‘General Employment and Commercial’ - see Recommendation 6 of Section 6.5 of this report.



A submission from **MH Associates on behalf of Michael Donaghey** (in respect of his lands at Bonagee and outlined in blue on the map below) requests that the lands in question are zoned for General Employment use or Established development.

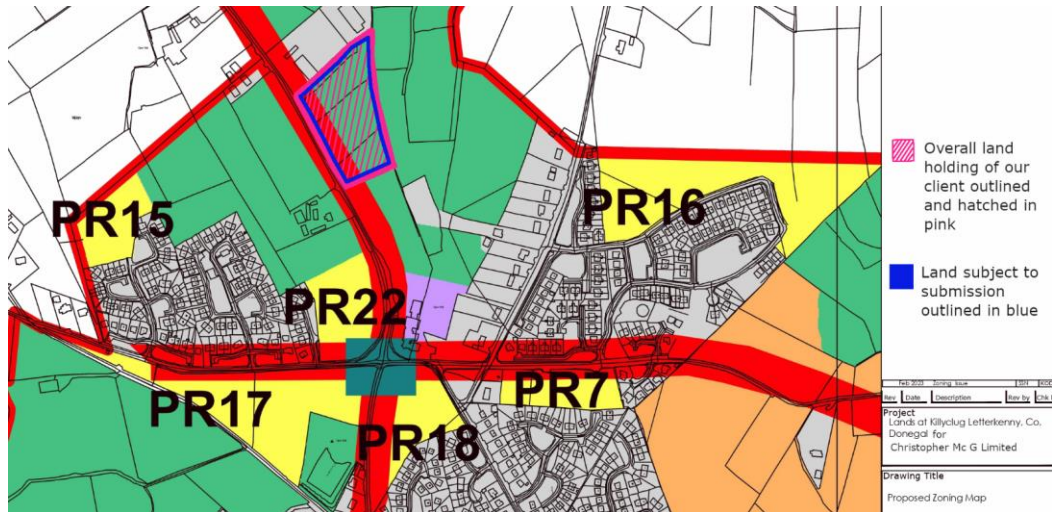


Chief Executive’s Response:

The contents of this submission have been noted and considered. The lands in question are currently at risk of flooding as identified by the Strategic Flood risk assessment prepared as part of the Plan making process and on www.floodmaps.ie

Recommendation: It would not be appropriate to zone these lands as general employment or established development and it is recommended to zone the lands as Open Space - **see Recommendation 7 of Section 6.5 of this report.**

Submission received from **MH Associates on behalf of Christopher Mc G Ltd.** in respect of lands at Killyclug (see map below) requests that these lands continue to be zoned as General Employment and Commercial. Further detail has been provided to justify the proposal for the continuation of the current zoning of these lands, such as consistency with adjoining pattern of development and to await the decision by An Bord Pleanala in respect of the lands.



Chief Executive’s Response:

The current zoning of these lands (under the CDP 2018-2024) provides for commercial development. The site is the subject of a recent refusal of permission by DCC for 5 no. commercial units currently on appeal to An Bord Pleanala. Reason for refusal relates directly to the Draft Local Area Plan and the prematurity of the application pending the plan making process. All of these points are noted and considered.

The subject lands are located at a significant remove from the core area of the town centre where commercial activity is generally directed. Whilst there are some commercial businesses at this location they are generally of a local neighbourhood level. Given the peripherality of existing commercial development at this location and the need to focus future commercial development in a town centre / edge of centre ‘compact’ location, the continuation of this land use zoning would not be considered appropriate.

Recommendation: The recommendation remains to zone these lands as ‘Local Environment’. No changes to the land use zoning map are recommended on foot of this submission - **see Recommendation 8 of Section 6.5 of this report.**

5.6 Transport

5.6(a) Local Transport Plan (LTP)

5.6.1 Overview

Substantive comments were received from the OPR, NTA, NWRA and TII. All the aforementioned statutory bodies generally welcome the preparation of the LTP. Indeed, the NTA commends the preparation of the LTP in conjunction with the LAP as a ‘*best practice approach*’. However, significant issues are also raised in these submissions. In general terms, the concerns are that the NTA’s ‘*Area Based Transport Assessment*’ (ABTA) guidance document was not adequately considered/applied, and therefore the requirements of RPO 6.27 contained in the RSES (supports the preparation of LTPs based on ABTA guidance) was not been complied with. In this context, they refer to the national policy direction of modal shift for the purposes of achieving climate mitigation and observe that the Plan is over-reliant on roads infrastructure, and is not sufficiently robust and comprehensive in terms of the sustainable modes components.

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5.6.2 Active Travel (Walking and Cycling)

In relation to active travel specifically, the Draft LTP addressed walking and cycling as a single mode. The statutory bodies refer to the ABTA guidance and the Department of Transport's 'National Investment Framework for Transport in Ireland (NIFTI) and, in this context, note that walking and cycling should be considered separately (albeit that routes will coincide in many, if not most, cases). Another specific comment of the NTA reflects the general tone of how active travel is addressed in these submissions: '*...the LTP, as presented, does not present a clear outline of the walking and cycling networks for Letterkenny*'.

The submission of the Department of Education includes general support for the development of sustainable links between schools and residential areas. Similarly, the DETB would like to see an expansion of active travel. The submissions of the ATU and Letterkenny Chamber are generally supportive of the proposed active travel ambitions. The ATU specifically references support for the Port Road boulevard proposal and the proposed active travel route along Ballyraine Road/Gortlee Road/Old Farm Road (the ATU's concerns re the absence of an identified active travel crossing point across the N56 Business Park Road is addressed in the Strategic Roads section of this report).

In his submission, Joseph McClafferty makes various suggestions namely: High Road should have a cycleway connecting Main St. and Circular Rd; New Line Rd. should have a cycleway to complement the 'Glenwood, Circular Rd. and Convent Rd. cycleways; cycleway in Southern Network Project; and that more estates should be provided with permeability.

Chief Executive's Response:

It is acknowledged that the ABTA approach was not fully applied during the preparation of the LTP. However, it must be noted that the ABTA methodology is detailed and complex and likely to be of most benefit in the case of much bigger city-scale settlements. For this reason, an approach more tailored to the scale of Letterkenny whilst having regard to the principles of the ABTA approach was formulated and steered by the Planning Service in consultation with Council Senior Engineers and Atkins Consultants. The consistency of this approach with that contained in the ABTA can be seen, for example, in the incorporation of the identification of key origins and destinations as a key pillar of the LTP (refer Map 19.1 and Fig. 19.1 of the Draft Plan) in line with the NTA's emphasis in its submission (p.4) on the importance of the consideration of the '*permeability and accessibility of key destinations, notably the town centre, local retail, schools and recreational amenity.*'

The Planning Service, in consultation with Road Service colleagues, have explored these issues with officials of the NTA subsequent to receive of their submission. The engagements have been very constructive and, it is reasonable to conclude, have allayed the concerns of the NTA with NTA officials commenting that a lot of the work '*is there*' and '*has already been done*' and that perhaps the issue was related to the presentation and interpretation of the LTP. On foot of these engagements, separate and revised walking and cycling maps, and revised public transport have been produced in accordance with the submitted requests. The revised maps incorporate some additional elements identified through the NTA's ATOS (Accessibility to Opportunities and Services) tool. The maps also contain representations of the active travel corridors of strategic roads projects, as opposed to a representation of the entire network project. The inclusion of the entire project corridor inclusive of road space contributed to the misunderstanding of the intent of their identification. Collectively, these amendments present a more comprehensive network in each case. The identified routes include the three routes suggested by Mr. McClafferty. The maps are included in Appendices C and D respectively.

Section 6.6 at the end of the report includes a Recommendation to include these maps in the Plan.

5.6.3 Public Transport (Buses)

The OPR and NTA submissions note two concerns. With regard to Letterkenny, it is suggested that there is an insufficient '*level of detail to give an understanding of how public transport services will operate within and through the town at a local level. Notably, there are no details as to what interventions, if any, may be required to facilitate public transport movement and priority within the town centre and to other key destinations.*' Secondly, the absence of commentary around the NTA's '*Connecting Ireland: Rural Mobility Plan*' is referenced and a clear recommendation given that the role of that Plan should be acknowledged.

Derry City & Strabane District Council suggest that there should be park and ride/share facilities in LK – to intercept car trips between Letterkenny and Derry/Strabane (similar to that proposed for these settlements). The DETB also noted support for park and ride.

Chief Executive's Response:

The concerns of the NTA and OPR are noted and acknowledged. During the process of preparing the Draft LTP there was significant engagement with the NTA on the issue of how the town's existing bus services could be improved. This resulted in the identification of two additional routes. These routes were shown in Map 22.1 in the Draft LTP but it is acknowledged that this diagrammatic-style map does not provide the clarity sought. The absence of details as to what interventions, if any, may be required to facilitate public transport movement and priority within the town centre and to other key destinations is also acknowledged.

Planning Services and Road Service colleagues have again had constructive engagement with officials at the NTA. Arising from these engagements, **Section 6.6 at the end of this Report includes the following recommended alterations to the Draft Plan:**

1. A revised Public Transport Map to clearly identify the existing and possible additional routes, together with the proposed Regional Transport Hub and the TEN-T Park and Share Hub. The proposed map is included in Appendix E.
2. The positive identification of the preferred location of the proposed Regional Transport Hub (RTH), and how it interacts with the existing and proposed bus routes network and the proposed town centre active travel networks.
3. A new policy supporting the principle of physical interventions to improve public transport priority.
4. Support for the development of 'Park & Share/Ride Modal Hubs' that will incentivise the use of buses. The TEN-T project includes such a facility inside of the Plan boundary in the Bonagee area. The Project includes additional sites to be developed under Section 3 between Letterkenny and Lifford, including one at the Manorcunningham Roundabout.
5. Support for the principle of the development of additional hubs in the commuter villages, notably Kilmacrennan, Ramelton, and Newtowncunningham where they would be serviced by regular and efficient 'Connecting Ireland' and 'Local link' public transport services.

The lack of commentary around the NTA's '*Connecting Ireland: Rural Mobility Plan*' and how Letterkenny is pivotal to the Plan in terms of the north-west is acknowledged.

Section 6.6 at the end of the report includes a Recommendation to include such commentary in the Plan.

5.6.4 Public Transport (Railways)

Policy LTP- PT- P-2 in the Draft LTP provides as follows:

'It is a policy of the Council to:

- a. support the provision of a Rail link between Letterkenny and Derry and Letterkenny to Sligo; and to support the reopening of the Western Rail Corridor from Athenry to Sligo, thereby completing the All Ireland rail network;*
- b. not protect the abandoned historic railways corridors within the Letterkenny Plan area boundary for strategic infrastructure provision (such as rail/road/ greenway projects) or for recreational development.'*

Recommendation 12 of the OPR submission requires that the Planning Authority delete Policy LTP-PT-P-2(b) and considers the potential use of the remaining corridor for active travel modes. The recommendation is made partly due to the potential active travel potential of such routes (generally) and is also made with reference to general policy in the County Development Plan that seeks to protect such corridors. The NTA makes a similar statement noting that such a policy is: *'premature pending the full consideration and development of the walking/cycle network for Letterkenny'*. Three private individuals Mr. R. Logue, Mr. J. McClafferty and Mr. J. Doherty also cautioned against the policy. Mr. Logue also suggested that the Plan should identify a railway route into the town.

Chief Executive's Response:

With regard to the issue of preserving historic railways, this policy approach was originally recommended due to the physical realities of how significantly compromised the historic railway lines in Letterkenny are, and therefore the lack of any real effectiveness of such a policy in the particular circumstances of Letterkenny. The referenced compromises were presented to the Letterkenny Members at a previous MD Workshop. **The presentation is attached as Appendix F.**

The OPR's comments re the Development Plan policy are noted. The Draft County Development Plan, 2024-2030 to be submitted to Members before Easter will include a recommended adjustment to the relevant policy in recognition of the particular circumstances of Letterkenny.

With regard to identifying a railway corridor into the town, this is not merited in the absence of a detailed appraisal of such a project.

Having regard to the aforementioned, Section 6.6 at the end of the report includes a Recommendation to retain the subject policy.

5.6.5 Strategic Roads: TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD)

The OPR, TII and NWRA support the delivery of the TEN-T PRIPD given its consistency in terms of regional connectivity with NPF NPO 45 and NPO 56, and RSES RPO 3.7.30.

5.6.6 Strategic Roads: Southern Network Project (SNP)

OPR Recommendation 10 requires *'the deletion of the southern strategic road corridor to the east of the Southern Network Project'* citing concerns that this proposal: *'will encourage car-based development in this area'*. The OPR and the NTA also refer to the SNP in the context of the 'Southern Strategic and Sustainable Development Site' (SSSDS). These comments are similar and captured in the NTA's comment: *'the (SNP) has not been presented in a manner which highlights the potential for a multi-modal focused development of the area.'*

Chief Executive's Response:

The Southern Network Project is being designed as a strategic multi-modal corridor that will have the mutually supportive benefits of:

- forming part of the strategic active travel network for the town in general;
- forming part of the sustainable transport elements of the SSSDS in particular;
- and relieving east-west strategic traffic from the town centre (and thereby helping to enable the ambitious regeneration projects, inclusive of active travel improvements, for the centre).

It is not the intention that this section would facilitate the type of development of concern to the OPR. However, the achievement of a connected multi-modal network will include the connection of the Southern Network Project multi-modal corridor to the national multi-modal network, and demonstrating this need was the reason behind identifying the two indicative links of concern to the OPR in the Draft Plan. It is acknowledged that the relevant reference in the legend to 'Strategic Road Corridor' was unhelpful in this regard. In conclusion, the concerns of the OPR are noted. It is therefore proposed that the two indicative 'Strategic Road Corridor' lines are removed from the Map, and an objective and narrative inserted into the Plan to set out the need for the connection as set out above. For these reasons, it is submitted that the Southern Network Project would be consistent with the 'Principles and Goals' of the *National Sustainable Mobility Policy* (Department of Transport).

For the reasons set out above, Section 6.6 at the end of the report includes a Recommendation to delete the 'southern strategic road corridor' to the east of the Southern Network Project and to insert text broadly as set out immediately above.

5.6.7 Strategic Roads: Northern Network Project (NNP)

OPR Recommendation 10 requires: *'the deletion of the Northern Relief Road ...'* citing concerns that this proposal: *'would facilitate the future development of extensive, peripheral lands (proposed 'Strategic Residential Reserve') inconsistent with the delivery of compact growth and sustainable mobility'*. The NTA expresses a concern that the LTP: *'as presented, does not adequately present how the road proposals, and associated increased road capacity (includes reference to the NNP) have been considered as part of a multi-modal focused solution for the future development of the town.'*

Chief Executive's Response:

The Northern Network Project is being designed as a strategic multi-modal corridor for the purposes of connecting the most densely-populated areas of the town (Glencar/Killylastin/Killyclug and Long Lane) with the highest concentrations of employment in the town (the IDA Business Park and associated employment lands on the N56 Business Park Road and, to a lesser extent, the Letterkenny University Hospital).

The Glencar/Killylastin/Killyclug area contains around 3,000 households and the Long Lane around 1,200 households. The numbers estimated to be employed in the IDA Business Park and environs is of the order of 3,700 and in the LUH of the order of 2,400. The current sustainable connections between the two are completely inadequate consisting currently only of footpaths at the southern ends of the housing areas along the Circular Road and the Kilmacrennan Road (between the Hospital Roundabout and the Knocknamona Roundabout. The route is identified as a key component of each of the proposed Walking, Cycling and Bus Routes Maps respectively submitted with this Report.

The provision of attractive sustainable transport alternatives by means of the NNP would, it is anticipated, remove multiple commuter and other car journeys from the local road network. This would greatly increase the scope to then significantly upgrade the links connecting the residential areas with the five schools located on Glencar Road/College/Convent Road thus building on the benefits of the recently-completed one-way and active travel project at Convent Road etc.

For these reasons, it is submitted that this project would be consistent with the 'Principles and Goals' of the *National Sustainable Mobility Policy* (Department of Transport).

Finally, it is noted that this route is identified in the RSES as a 'Core Project' (Figure 33: 'Letterkenny – Core Projects' refers) and the submission of the NWRA did not reference this issue.

For the reasons as set out above, Section 6.6 at the end of the report includes a Recommendation to retain the Northern Network Project and to insert text broadly as set out immediately above.

5.6.8 Strategic Roads: Western Relief Road (WRR)

OPR Recommendation 10 requires: *'the deletion of the Western Relief Road ...'* citing concerns that this proposal: *'would facilitate the future development of extensive, peripheral lands (proposed 'Strategic Residential Reserve') inconsistent with the delivery of compact growth and sustainable mobility'*. **OPR Recommendation 7** also requires the deletion of the **'associated strategic and development led roads objectives to the west of the settlement'**. The NTA expresses a concern that the LTP: *'as presented, does not adequately present how the road proposals, and associated increased road capacity (includes reference to the NNP) have been considered as part of a multi-modal focused solution for the future development of the town.'*

Chief Executive's Response:

It is accepted that the WRR is a significantly longer-term project. It is also accepted that the Draft Plan as presented is open to interpretation as seeking to unlock extensive peripheral 'Strategic Residential Reserve' (SRR) residential lands to the west of the town in the short-to-medium term although this was not the intention. Having regard to this position, and having regard also to the **OPR's Recommendation 7** (effectively an instruction) to delete the western SRR lands, Section 6.6 of this Report recommends that these lands are deleted. However, given that the long-term transport corridor has been established in policy across several plan iterations, and given the long-term benefits of protecting the corridor from being compromised, on balance it is considered reasonable that the corridor is retained in the Plan but on the basis that the referenced SRR lands are deleted as per the OPR's recommendation.

Finally, it is noted that this route is identified in the RSES as a 'Core Project' (Figure 33: 'Letterkenny – Core Projects' refers) and the submission of the NWRA did not reference this issue.

For the reasons as set out above, Section 6.6 at the end of the report includes a Recommendation to retain the Western Network Project and to insert text broadly as set out immediately above.

5.6.9 Strategic Roads: Use of ILUTS

The OPR, NWRA and NTA question the veracity of the ILUTS traffic modelling tool used to inform the preparation of the Draft LAP and LTP.

Chief Executive's Response:

It is accepted that the reference at Section 15 in the Draft Plan gives the impression that the 2009 ILUTS study was used for modelling purposes. However, Atkins Consultants were contracted in 2020 to undertake a 2017 Present Year Validation of the ILUTS model which included:

- Reviewing developments in Letterkenny between 2009 and 2017;
- Application of traffic growth in Letterkenny between 2009 and 2017;
- Changes and upgrades to the network between 2009 and 2017; and
- Completing a calibration and validation exercise to the Project Appraisal guidance acceptability criteria.

Using this updated base model, three forecast year demand scenarios were developed to reflect a phased implementation of the draft Land Use Plan.

The following interventions were then tested in the forecast models:

- TEN-T
- Southern Network Project; and
- 10% reduction in demand proxy test to represent a shift to sustainable modes.

A review was also undertaken of the 2019 and 2022 TII traffic counters situated on three main corridors into Letterkenny. This analysis indicated that 2022 traffic volumes and temporal profiles have broadly returned to a pre Covid-19 level.

Section 6.6 at the end of the report includes a Recommendation to insert additional non-material narrative into the Plan to elaborate on the updating and use of the ILUTS modelling.

5.6b N56 Letterkenny Urban

General Comments

The OPR, TII, NWRA and NTA express significant concerns around the development management policies for the N56 Lettekenny Urban within the Plan. The referenced policies are inserted below for ease of reference:

Objective LK-ED-O-2: It is an objective of the Council to safeguard the carrying capacity, functioning and safety of urban sections of the N56 National Secondary Route in Letterkenny as a key strategic transport corridor, lifeline route and multimodal urban connector. The Council will ensure that any development seeking direct access or that would result in the intensification of use of existing access points or junctions is designed and assessed to ensure that the capacity, operation and safe function of the N56 are preserved and/or improved. Where applicable, any development will tie in with any established or developed Junction Strategy/Policy for this key route as and where such are set out.

Policy LK-EDE-P-2: It is a policy of the Council to continue to avoid an ad-hoc proliferation of new or intensified existing access points along the N56 Four Lane Road. The Council will consider limited and coordinated new junctions, or the intensification of use of existing junctions, where such proposals are presented and considered as part of an overall plan maximizing serviced areas and minimizing junctions, and where it can be clearly demonstrated that such development:

- a. would not affect the capacity, operation or safe functioning of the road; and**
- b. would not prejudice the servicing of adjacent areas.**

Policy LK-EDE-P-3: It is a policy of the Council to only support the provision of professional services, where the services proposed are provided principally to visiting members of the public, within the defined town centre or within established neighbourhood centres.

The submission of the TII contains the most detailed of these commentaries. It firstly places these concerns in the context of a suite of national policy instruments including:

- ~ NPF National Strategic Outcome (NSO) 2 (to maintain the strategic capacity and safety of the national roads network);
- ~ National Development Plan, Chapter 7: 'Enhanced Regional Accessibility' (sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard);

The TII notes that similar requirements are contained in:

- ~ the 'National Investment Framework for Transport In Ireland' (NIFTI);
- ~ the 'National Sustainable Mobility Policy'; as well as
- ~ the 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

The TII finally refers to the RSES and the support contained therein for national policy relating to roads. Relevant policies include RPOs 6.5, 6.6 and 6.7.

In the context as set out above, the TII notes that: *'Within Letterkenny, the N56 national secondary road is a strategic route that provides important connectivity within Donegal and provides onward connectivity to the N113 and N15 national primary roads, both of which are part of the TEN-T comprehensive network. Additionally, the N56 national road provides access to goods and services for peripheral communities and provides economically important onward connection to national markets, and via ports and airports, to international markets'*.

Taking account of these factors, TII highlights that: 'particular concern arises from access proposals to the N56 which it is considered conflict with NPF National Policy Objective 74, NPF National Strategic Outcome 2 and RSES Regional Policy Objective 6.5.

N56 Business Park Road

In the above-noted context the **OPR Recommendation 11** requires an adjustment of Objective LK-ED-O-2 as below. The TII makes identical recommendations (text to be deleted shown in ~~strikethrough~~; new text in *blue italics*).

Objective LK-ED-O-2: It is an objective of the Council to safeguard the carrying capacity, functioning and safety of urban sections of the N56 National Secondary Route in Letterkenny as a key strategic transport corridor, lifeline route and multimodal urban connector. *Pending the development of an agreed transport solution and access strategy for the N56 Business Park Road, to be incorporated into the Local Area Plan, the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kph applies.* ~~The Council will ensure that any development seeking direct access or that would result in the intensification of use of existing access points or junctions is designed and assessed to ensure that the capacity, operation and safe function of the N56 are preserved and/or improved. Where applicable, any development will tie in with any established or developed Junction Strategy/Policy for this key route as and where such are set out.~~

[Submission of ATU:]

ATU notes its understanding that that Objective LK-ED-O-2 is necessary to protect the function of the N56 National Secondary Route, but caution that it is important to recognise that the character of the road will change as the surrounding area develops in line with the land use zoning objectives. The need to tie in with "any established or developed Junction Strategy/Policy

for this key route as and where such are set out” is also welcomed and ATU points out that they have been working with adjacent landowners to consider a co-ordinated approach to access, connectivity and permeability throughout the area. The ATU makes a number of recommendations as follows:

Recommendation 1: The zoning matrix (Table 7.2) should be amended to confirm that a Park/Playground is acceptable in principle within this zoning.

Recommendation 4: The annotation on the proposed Land Use Zoning map 7.1 is amended: (additional text in *blue italics*) ‘Area subject to requirement for co-ordinated and masterplanned approach to ensure connectivity and permeability throughout adjacent land parcels. *This policy is not intended to hinder the progression of individual planning applications across the individual land use zonings.*’

Recommendation 5: Amend wording of narrative at Section 8.2: ‘National Secondary Route N56’ as follows (additional text in *blue italics*): “...this road is a critical means of access to areas of significant development in Letterkenny, most notably the employment area *and Strategic Community Opportunity* centred on the N56 Business Park Road”.

ATU note that Policy LK-SCC-P-3 (relating to the ATU Port Road Campus) in the Draft Plan reiterates the policy set out in the current CDP (Policy LK-SCC-P-2), however a similar policy relating specifically to the ‘Strategic Community Opportunity’ site at Knocknamona and Carnamuggagh Lower has not been included.

Recommendation 6 of the ATU therefore recommends a similar policy to LK-SCC-P-1 as set out in the County Development Plan, worded as follows:

“Policy LK-SCC-P-[?]: *On lands identified as ‘Strategic Community Opportunity’ on the ‘Land Use Zoning Map’ that accompanies the Local Plan, the Council will seek to achieve an appropriate mix of health and/or educational and/or social and/or community development which may include hospital expansion, educational, research and development, recreational uses, community health, childcare facilities or student accommodation. Proposals for residential development on lands zoned Strategic Community Opportunity shall only be considered where they comprise student accommodation. Proposals for other types of residential development will not be favourably considered. The identification of lands for the provision of additional community related development and expansion, particularly in the areas of education and health is necessary in ensuring long-term supply of land to meet key strategic needs of these essential services. These lands are located close to the existing service provision at the Letterkenny General Hospital campus where linkages with the existing health uses may be appropriate. Also, the lands are located within reasonable walking distance of key transport corridors and therein are accessible to the Town Bus Service providing valuable opportunities for expansion of services provided through the Atlantic Technological University. The Council will support active travel proposals that will enhance access to these lands, including pedestrian access across the N56”.*

In terms of student accommodation on the ‘Strategic Community Opportunity’ lands, it has already been noted earlier in this report that the OPR has recommended that any such accommodation should be located at the southern end of the Strategic Community Opportunity zoning, to better facilitate active travel and compact growth. This is accepted and is reflected in **Recommendation 18, Section 6.2 of this report.**

Submission of IDA

In taking a proactive role with local stakeholders, IDA has participated in a forum with Atlantic Technological University (ATU) and Magim Ltd, to realise the wider potential of the Business Park in Letterkenny, by integrating with future plans for sport, education and homes on the adjoining lands. The ambition is to integrate IDA's existing masterplan with future plans by ATU and Magim Ltd, creating a new sustainable zone to live, work, learn and play. Joint working between the parties culminated in the preparation of a Common Design Principles document (published August 2019), providing a framework for achieving integration between the respective existing and future masterplans. The purpose of the Common Development Principles is to ensure there is a common approach to masterplanning the Carnamuggagh/IDA/ATU lands. It is not intended that Common Development Principles should:

- introduce conditionality that in any way limits or prevents any party from individually and separately progressing development of their respective lands, or
- to introduce any form of phasing or sequencing of development.

The Draft Land Use Zoning Map identifies the lands controlled by ATU, IDA and Magim Ltd lands as being subject to the following requirement:

- ‘Area subject to requirement for a co-ordinated and masterplanned approach to ensure connectivity and permeability throughout adjacent land parcels’.

This proposed requirement reflects the spirit of the engagement there has been between the landowners and their commitment to a shared vision; and is compatible with the Common Development Principles. Accordingly, it is assumed that the proposed Land Use Zoning Map requirement is seeking to future proof accessibility to the lands and, appropriately, is not intending to influence the sequence or phasing of development proposals brought forward by the respective landowners?

Submission of Magim

Magim Ltd welcomes the zoning of Opportunity Site 12 on the Carnamuggagh lands and requests a number of ‘minor amendments’ to Policy LK-OPP-P-12. These suggestions are reproduced below.

Policy LK-OPP-P-12: It is a policy of the Council to –

(i.) Support the principle of the following development types on Opportunity Site 12, subject to compliance with all relevant policies and standards contained in this plan and the CDP.

- Residential,
- Local neighbourhood level retail activity in accordance with the provisions of the County Development Plan,
- Commercial and General Employment use that is in keeping with the nature of established development in the nearby IDA Business Park; and
- Educational use.

(ii.) Require that development on Opportunity Site 12 proceed in accordance with a masterplanned approach which shall be agreed with the Council as part of the planning *application* process. The masterplan shall deal with the area denoted ‘Masterplanned Approach’ on the legend of the land-use zoning map and shall, inter alia, -

- a) Provide for vehicular, pedestrian and cycle connectivity from Opportunity Site 12 through the lands to the immediate south and on through the IDA business park (*subject to agreement with IDA Ireland and ATU*) and,
- b) Provide for pedestrian and cycle connectivity from Opportunity Site 12 through adjoining lands to the east (in order to facilitate connectivity with the Lisnennan Road) and;
- c) Provide for vehicular, pedestrian and cycle connectivity from Opportunity Site 12 through adjoining lands to the north/~~northeast~~*northwest*, with egress onto the N56 in the vicinity of the Mountain Top (unless otherwise agreed with the planning authority).
- d) Provide comprehensive details in relation to the phasing of development,
- e) Provide comprehensive details detailing how all relevant traffic safety policies and standards are to be complied with and
- f) *Maintain a collaborative approach* ~~Provide details of collaborations~~ with other landowners in the area as regards the overall development of the masterplan area.

N56 Four Lane Road

In the above-noted context the **OPR Recommendation 11** requires an adjustment of Policy LK-EDE-P-3 as below. The TII makes identical recommendations (text to be deleted shown in ~~strike through~~; new text in *blue italics*).

Policy LK-EDE-P-2: It is a policy of the Council to continue to avoid ~~an ad-hoc proliferation of~~ *the creation of* new or intensified existing access points along the N56 Four Lane Road. The Council will *prepare an access strategy* to consider limited and coordinated new junctions, or the intensification of use of existing junctions, where such proposals are presented and considered as part of an overall plan maximizing serviced areas and minimizing junctions, and where it can be clearly demonstrated that such development:

- a. would not affect the capacity, operation or safe functioning of the road; and
- b. would not prejudice the servicing of adjacent areas.

Such an access strategy will include consultation with TII and is required to be plan-led and evidenced based for inclusion in the Local Area Plan. Pending the incorporation of an agreed access strategy for the N56 Four Lane Road.

ATU: Policy LK-EDE-P-2 is slightly ambiguous as it refers to the 'N56 Four Lane Road' whilst Objective LK-ED-O-2 relates to the entire urban section of the N56. If it is the intention that policy LK-EDE-P-2 relates specifically to the annotated areas on the Land Use Map (see Figure 4), then the annotation on the Land Use Map should explicitly reference the relevant policy.

Chief Executive's Response:

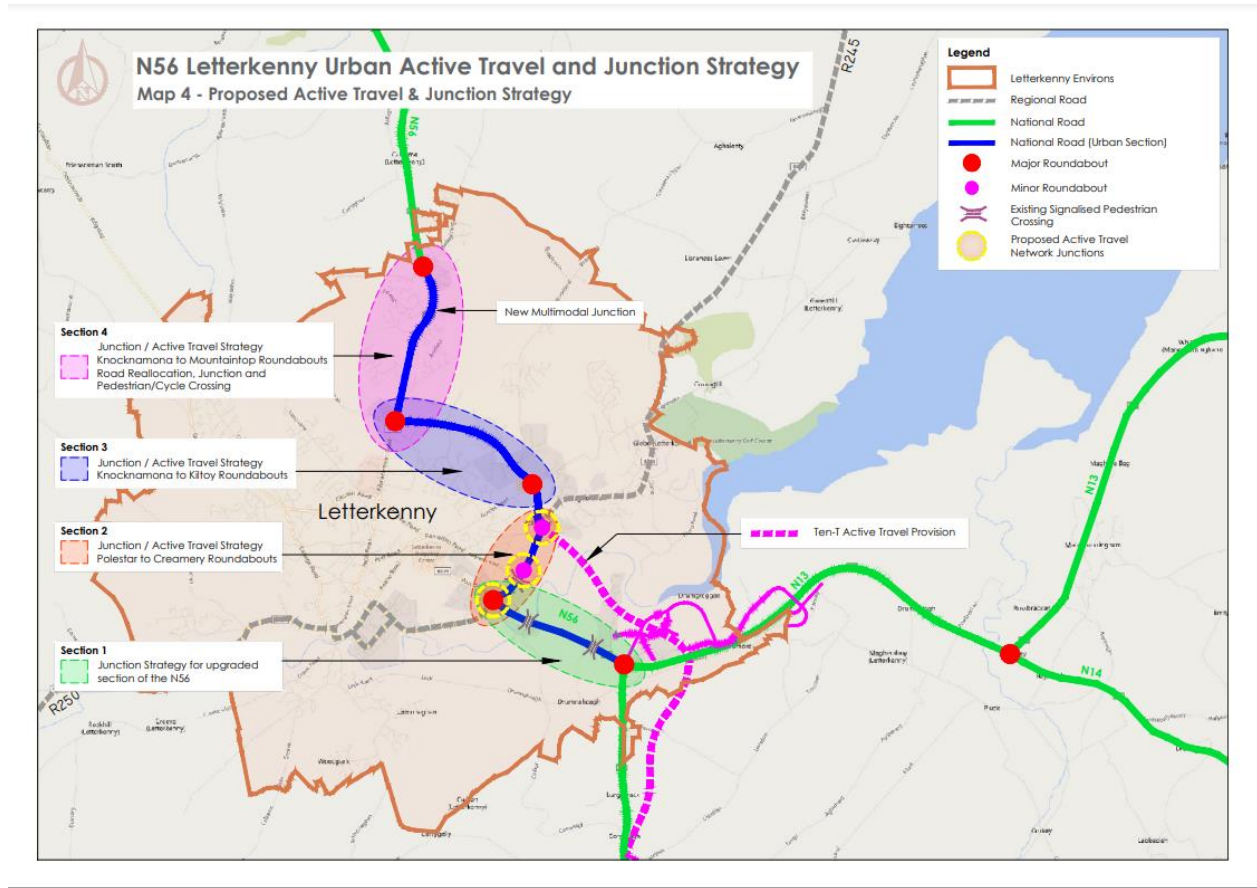
General Comments

The N56 through Letterkenny is a critical multimodal transportation corridor enabling movement of all goods, services and people within and around Letterkenny and is fundamental for compact urban growth, economic development and modal shift within Letterkenny as envisaged under national, regional and local policies. It is the sole primary access to and from Letterkenny for all vital emergency services and the limited network resilience means that any operational issues arising can rapidly result in shutdown and significant disruption to these services and the wider town.

Planning policy in respect to the N56 Letterkenny is to create a safe and attractive Active Travel corridor that facilitates active travel modes along and across the N56 through Letterkenny and to safeguard and maintain the function and operation of the N56 as a Strategic distributor and lifeline route for all transport modes. It is also vital to enable sustainable and appropriate development access. The key policy deliverables with respect to the N56 include provision of new/improved active travel facilities, provision of new crossing facilities, and signalisation and rationalisation of existing junctions. This will enable multimodal connectivity along and permeability across the N56 for all road users and will optimise function and efficiency of the urban N56.

Overall new accesses to the N56 Urban will only be permitted if 'exceptional circumstances' are established in accordance with the Spatial Planning and National Roads Planning Guidelines (DECLG: January, 2012) and County Development Plan Policy. Similarly, any development resulting in intensification of an existing junction(s) must be consistent with the overall strategy for the N56 and for the particular policy for improvement as outlined below.

The existing N56 Letterkenny Urban is a key multimodal transport corridor. For the purposes of planning management and operation, the N56 can be divided into four distinct sections as shown in the figure and as described below.



1. N56 Four Lane Road (Dry Arch Roundabout to Polestar Roundabout)

Upgrades to the existing N56 Four Lane Road are nearing completion. Designed to Design Manual for Urban Roads (Government of Ireland: April, 2013) standards, the upgrades will provide for a speed limit of 60kph, segregation of carriageways, removal of all but two right turning junctions and full Active Travel (pedestrian and cycle) facilities on both sides of the road including two signalised crossings. As a primary connecting route and lifeline transport corridor, new access onto the N56 Four Lane Road must still be tightly controlled and/or restricted. It is proposed that development lands to the south may only be accessed via the existing local road junctions or alternatively by a single improved junction to the N56, replacing the existing poorly aligned Cullion Road and junction. For existing developed and developable lands to the north immediately adjacent to the N56 Four Lane Road, for which no other existing access is available it may be considered appropriate given the new upgraded design to allow a restricted number of new left-in/left-out accesses, subject to appropriate assessment.

Section 6.6 at the end of the report includes a Recommendation to insert additional policy reflecting the above.

2. N56 Polestar Roundabout to Creamery Roundabout

This is a legacy section of the N56. It is subject to a previously approved Part VIII application which includes signalisation and rationalisation of the existing junctions. In addition, it is proposed to provide new and improved Active Travel facilities along and across the N56,

including potential road-space re-allocation where feasible, in conjunction with the signalised junctions.

Section 6.6 at the end of the report includes a Recommendation to insert additional policy reflecting the above.

3. N56 Creamery Roundabout to Knocknamona Roundabout (Business Park Road)

From the Council's perspective, it is proposed to provide new/improved Active Travel facilities along and across the N56. It is also proposed to provide two new Primary signalised junctions and rationalise existing junctions and accesses to enable permeability across the N56 for non-motorised users and to facilitate improved function and efficiency on the N56. This also includes a reduced speed limit to provide consistency along the N56 and to facilitate junction arrangements.

Section 6.6 at the end of the report includes a Recommendation to insert additional policy reflecting the above.

Regarding Recommendation 1 of the ATU, a Park/Playground is acceptable in principle within the zoning.

Regarding Recommendation 4 of the ATU and a similar concern expressed by the IDA, it is confirmed that it is not intended to hinder the progression of individual planning applications across the individual land use zonings.

Regarding Recommendation 5 of the ATU, this is agreed.

Section 6.6 at the end of the report includes a Recommendation to insert additional policy reflecting the above.

Regarding Recommendation 6 of the ATU:

- ~ acceptable uses are adequately specified in the zoning objective contained in Table 7.1;
- ~ the recommended additional narrative highlighted in green above is agreed;

Section 6.6 at the end of the report includes a Recommendation to insert the suggested additional narrative.

~ the active travel issue is addressed in the recommended new policy dealing with the Business Park section of the N56 road.

Regarding the comments of Magim, the key issues here relate to access (both to the national road and internally between the three landowners). The recommendation to insert new policy re the Business Park Road, and the revised walking and cycling maps respectively address these issues for the purposes of the Report.

4. N56 Knocknamona Roundabout to Mountaintop

This is a legacy section of the N56. It is proposed to provide new/improved Active Travel facilities along and across the N56 to improve connectivity and permeability for pedestrians and cyclists. It is also proposed to rationalise existing junctions and accesses by providing new

Primary Junctions to improve safety, connectivity, permeability, function and efficiency of this section of the N56 for all road users.

For the reasons as set out above, Section 6.6 at the end of the report includes a Recommendation to insert a new policy to guide development along the N56 Urban Corridor

5.7 NWRA Recommendations and Observations

The NWRA makes 11 'recommendations' and 14 'observations'.

Chief Executive's Response: Recommendations 1, 3, 8 and 11 are addressed elsewhere in the Report.

Recommendations 4, 6 and 9 require the insertion of additional narrative. This additional narrative is non-material in nature may be submitted to Members later in the process.

Recommendation 2 and 7 refer to the Regional Growth Centre Strategic Plan (RGCSPP) boundary outlined in Section 3.7(b) of the RSES. Recommendation 2 requires that *'the Draft LAP should revise the overall boundary to replicate that of the RSES'*. Recommendation 7 requires the inclusion of: *'commentary and appropriate policy measures, which support the retention of existing agricultural lands between the development envelope and the Regional Growth Centre boundary'*, thus reflecting RPO 3.7.24. Of note is that the 'intervening lands' between the LAP boundary and the RGCSPP boundary are currently covered by the 'Area Under Strong Urban Influence' policy in the County Development Plan and it is likely that this policy would continue in place pending adoption of the emerging County Development Plan, 2024-2030.

The recommendations in Section 6.7 of this report address these issues.

Recommendation 10 requires that the Plan sets out 'a commentary and policy providing for a building heights study as part of an overall strategy to guide future development within the centre of Letterkenny as per RPO 3.7.27 of the RSES'.

The recommendations in Section 6.7 of this report address these issues.

With regard to NWRA 'observations' - many of these observations are presentational matters (e.g. a suggestion to decouple the basic land-use zoning map from other elements of the Plan, including proposed Road Corridors, junction improvements, numbered Opportunity Sites etc. for ease of reference; a suggestion to identify various neighbourhoods in the town etc.) whilst other observations relate to the narrative of the LAP (e.g. suggestion to review Chapters 5 & 9 to afford enhanced recognition and due prominence to the value of the historic core of Letterkenny; suggestion to consider the implications of the MICA / Defective Block crises and the likelihood of significant scale of residential demolition; suggestion to elaborate on the implications of a new Retail Strategy to be delivered through the County Development Plan in 2024etc.). All observations of the NWRA have been noted and shall be considered further in the next phase of the plan-making process, which may result in further recommended alterations to the Draft LAP.

5.8 ATU Town Centre Lands

ATU welcome the LAP and Transport Plan and support integrated land use and transport planning in a strategic manner. ATU agree with the structural issues and infrastructural deficits identified in the LAP but suggest that sports, community and recreational facilities are considered to be a strategic deficit that should also be listed in Table 6.1 of the Plan. ATU welcome the acknowledgement of the University as an important economic driver and note that this is reflected in the Economic Development and Town Centre chapters of the Plan. The submission noted that the ATU has developed detailed masterplans for their sites at the Port Road, and Knocknamona and Carnamuggagh Lower for the development of 'Letterkenny Regional Sports Activity Hub (LRSAH)'.

As regards the town centre area, the ATU submission contains 2 No. recommendations –

1. ATU request that 'developer led road' between the port road and Neil T Blaney road be omitted on the basis that it fails to align with the Letterkenny 2040 Regeneration Plan and fundamental principles set out in the Town Centre Strategy, which is focused on active travel and reduced dependence on the private car. ATU note that they will continue to collaborate on the Green Connect project and further note that the 'developer led road' passes through an area of flood risk and is not compatible with the ambition to create a 'wetland' as described in the Letterkenny 2040 Regeneration Plan.
2. ATU advise that they own land on the south side of Port Road (see map below) which currently provides temporary car parking serving the University and which will be pivotal to ATU's future growth. ATU request that the purple hatch denoting the 'ATU campus' on the land-use zoning map be extended to include the land within ATU ownership on the south side of the Port Road.

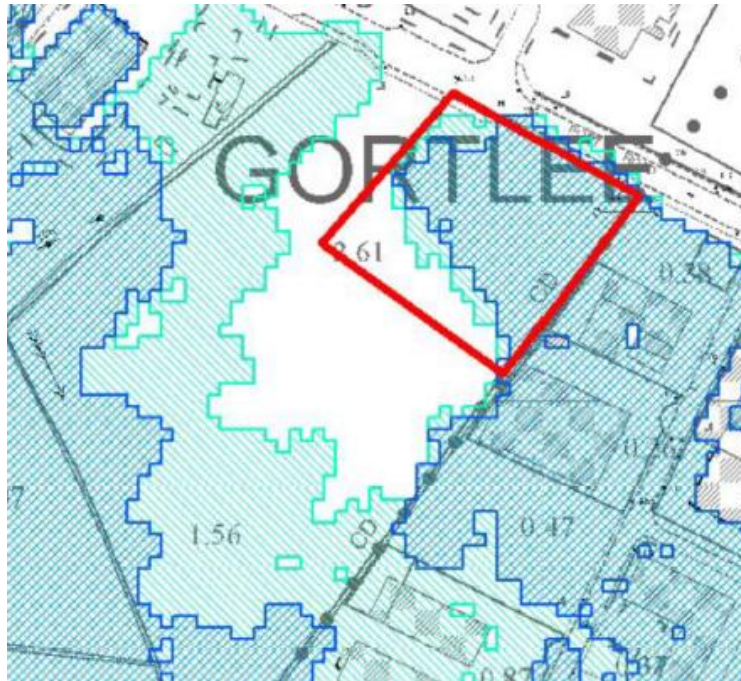


Chief Executive's Response:

The details of the ATU submission have been noted and considered. As regards the indicative developer-led road in the town centre, it is agreed that this would not be consistent with the aims and objectives of the Green Connect project. The existence of a flood risk at this area is also acknowledged. It is therefore recommended that this indicative road line be removed from the land-use zoning map – see **Recommendation 1, Section 6.8 of this report**.

As regards the inclusion of additional lands within the ATU campus designation, I would note that this parcel of land is subject to potential flood risk (see extract from SFRA report below,

which details the extent of flood zones A and B within the subject lands). RPS consulting engineers have undertaken flood modelling which demonstrates that the area outlined in red could be developed without increasing the risk of flooding elsewhere. However, their recommendations in respect of the lands outside of the red line are that 'the land use zoning in the areas within flood zone B should be less vulnerable development and those in flood zone A should be water compatible in accordance with the guidelines'.



Extract from SFRA Report - ATU lands south of Port Road

Members will have already noted the commentary in relation to flood risk contained in Section 5.4 of this report and the subsequent recommendations in relation to the town centre area, which will in principle allow for consideration of the expansion of the ATU campus in the town centre, subject to the findings of a detailed flood risk assessment. However, it is considered that the extension of the 'ATU campus' designation south of the Port Road, in an area of flood risk, may give rise to a presumption that vulnerable development will automatically be accepted at this location, which is simply not the case. In light of these considerations, no changes to the 'ATU campus' designation are recommended - **see Recommendation 2, Section 6.8 of this report.**

5.9 Chamber of Commerce

Letterkenny Chamber of Commerce have lodged a detailed and supportive submission on the Draft Letterkenny Plan and Local Transport Plan and make and identify some important points. The Chamber have detailed their submission under a set number of headings and largely supports the Plans growth and population ambitions and shares the concern over infrastructural deficits in the provision of water sewerage and road access.

The submission goes into further detail and is summarized below under the headings listed throughout the submission.

1. Flood risk

The Chamber worryingly acknowledge that large parts of the Plan area are at risk of flooding that should be taken as an opportunity by the council to lead the way in developing town centre wetlands and to consider alternatives to hard manufactured flood defenses.

2. Infrastructure Deficits (including Town Centre)

The Chamber acknowledges the legacy of under-funding and infrastructure deficit in investment over preceding decades and how it will prevent the town from realizing its potential as a regional centre of scale. They also note this within the Town centre.

3. Strategic Transportation & Sustainable Transport

The Chamber are supportive of the reinstatement of a Rail service in the county and would harbour this as their own longer-term ambition. Acknowledging that the provision of rail would thereby reduce car usage in the town and throughout the region. However, the Chamber supports the delivery of the TenT Priority route as enabling infrastructure to decongest the town centre and to largely improve traffic movement throughout the county. The Chamber endorses the delivery of the TenT as by far the most important project in the medium term for the town. The Chamber acknowledge the need for an effective and efficient public transport service. Public transport alongside sustainable options needs to be available to offer a viable alternative to the public. Efficient public services including bus routes that serve employment and education needs are required to be considered as realistic alternatives. The development of a transport hub would make a public transport plan much more useable for all.

4. Walking Routes.

The Chamber in this point make it known that they support the proposal in the Transport Plan that sets out the introduction of Active travel schemes in the town centre and they detail how they see the overall benefits to the town and into the future.

The Chamber broadly welcomes the introduction of town centre walking routes, recreation and public realm through the first phase of development proposed by way of the LK Green Connect project. The Chamber notes that this project will open up one area to demonstrate how walking and cycling routes could be developed across the town centre, and the more routes that are removed from traffic flow the better and the more they will be utilised.

5. Southern Strategic Development Site.

The Chamber under this heading offer their support for the proposed zoning of this area to the south side of the Swilly and recognise that it would be a significant boost to Letterkenny Town Centre. Partnered with the Southern Relief Route and new river crossings (pedestrian and vehicle) would open up opportunities for development close to the town centre and would enable those living in existing housing developments to access the town centre more easily.

6. Glencar and Community.

The Chamber agrees with the section of the Plan that sets out the future proposals for the Glencar area. The Chamber notes that this is an existing large residential area with little or no facilities and further suggests that the Draft Plan needs to make as much provision in this area to keep the community connected and engaged.

7. Town Centre Strategy & Urban Design Policy Framework

Letterkenny Chamber welcomes the proposed town centre strategy in the plan with regard to linkages, public realm, local transport and agrees are all needed to attract and retain business and to ensure the town centre and particularly the traditional town centre has an opportunity to thrive. The policies in relation to the retention of traditional shop fronts, signage & shutters is

welcomed. The Chamber provides support for the Urban design policy framework which they believe is important in creating a sense of place.

8. Business Parks & Opportunity Sites

The Chamber notes the importance of the existing Business parks/zones and their retention to attract potential business and to create opportunity sites.

The Chamber welcomes the identification of Opportunity sites and the policy of retaining areas of environmental interest and protecting the built heritage and yet recognises the challenges that each one presents.

9. Bonagee & Mountain Top

The Chamber note the organic development of other commercial areas of the town such as Bonagee and Mountain Top. These areas have design and quality issues as well as being un-serviced in wastewater have organically grown over time. While there are issues with design and quality they remain accessible areas for many and are home to many businesses. The chamber wish N56 – Multi modal Urban Connector This is a key transport corridor that helps serve the whole of Letterkenny. It is crucial that this is developed to preserve the safety, capacity and function of the N56. We do need to be mindful however that new development along the 4 Lane stretch does not compromise its core function. . We believe that the regeneration of this stretch of road will make it more attractive as a frontage for business however new businesses will need better quality design and will need to avoid creating ad hoc access points on to the carriageway.

10. Parking

Letterkenny has a large amount of parking available and at affordable rates. The Chamber welcomes the relaxation in the need for the provision of car-parking spaces and notes that it will go some way in helping to change the culture of parking directly outside premises or workplaces. Regard should remain to the provision of car-parking for town centre residential.

11. Housing

The Chamber recognises the need for quality housing units in the town centre but regard must be had to learning from past experiences when providing for town centre housing and especially high density and when providing for a changing population. The Chamber supports town centre living, this creates a more vibrant town centre, helps link communities to the town and makes everything more accessible. The future population, more mindful of energy use and climate change will be encouraged to reduce car ownership. However, this is very much long term.

12. Climate Adaptation & Mitigation

The Chamber commend these policies on climate adaption and mitigation regarding habitat, blue & green infrastructure, electric charging points and adoption of SudS policies in areas where there is flood risk. Throughout the life of this plan climate change targets and mitigations will move into even higher priorities and all developers should have to take them into account.

13. Built & Natural Heritage

The Chamber note the reference to the River Swilly and commends this and acknowledges that in the past not enough regard has been given to the river. Proposals for the town centre and river in developing a walkway and bringing it back into use will create amenity sites and opportunities for walking, cycling and once more providing connections to residential developments and other communities. The Chamber recognise the rich built heritage in Letterkenny. The policies will serve to protect and preserve areas such as The Cathedral Quarter ACA.

14. Social, Community & Culture

Letterkenny is well served culturally, and the development of the Cultural Quarter is welcomed. There are however some areas where there is community and social disconnection. Glencar and Long Lane are noted as being in need of services such as Childcare provision, parks and community amenities close by. These create a focus for families and young people making services accessible in their own neighbourhood with opportunities for much better community cohesion.

15. Transport Policy Framework

The Chamber note the transport issues at large in the town and to create a compact liveable town it needs to have a more coherent, sustainable transport strategy. At present it is car dominated and served by roads based solutions. The planned strategic infrastructure projects are welcomed although note that they may make some difference in diverting traffic and will enable the active travel routes for walking and cycling to become more attractive alternatives.

16. Transport Hub & Public Transport

The Chamber stresses the importance of good public transport within the town and the town centre and the importance of creating a multi modal transport hub that accommodates public and private transport providers. The Chamber acknowledge how the Hub if located correctly can act as a centre for multi modal activity, as a focal meeting hub with coffee shops and some convenience retail opportunities. Town centre living must be within walking cycling distance to the hub with public transport a further option. Reference is made to 'The Transport hub and Letterkenny Green Connect' which will make walking and cycling much more appealing and car based movement less so. The Chamber acknowledge the difficulties in achieving the 15 minute City concept but agree that having policy support for such an initiative in the Plan will mean we will strive to achieve it.

17. Connecting Communities

The Chamber note the importance of the Governments National Initiative 'Connecting Communities' and this important that public transport connects with greenways, residential developments, schools and businesses.

18. Schools

The Chamber acknowledge the work which has been done to date and will continue through Green Schools projects to encourage walking, cycling and scooting. The work already carried out is noted by the Chamber around the main school campus areas which has improved traffic flows and made it safer for students to travel.

19. Bike Scheme

The Chamber endorse the introduction of a public rental bike scheme (electric) within Letterkenny town to encourage alternative travel, reduce emissions and remove the single use car journeys. And encourage Council to protect the lands for current and future routes, commit to schemes planned and commit to removing traffic from the congested town centre.

Chief Executive Comments /Conclusion

It is highly encouraging that Letterkenny Chamber, who are a key and valuable organisation operating within and on behalf of the business interest within the town at present, are so supportive of the Draft Plan and the policies and objectives contained within. All the comments made by the Chamber are noted and taken into account and whilst there are no recommendations to be made on foot of this submission again it is noteworthy that the plan addresses areas of interest, significant areas of importance and emerging concerns for the future development of the town.

Recommendation

No recommendations are being made on foot of this submission.

5.10 Other Statutory Bodies

The Health and Safety Authority (HSA)

The HSA have no observations on the draft LAP and LTP.

Irish Aviation Authority (IAA)

Recommend that Council consult with the HSE Aero-Medical and Special Operations Section, Health Service Executive and University Hospital to ensure there are no adverse impacts on the safety of helicopter operations at Letterkenny Hospital.

Chief Executive's Response: Copies of the Draft LAP were forwarded to the relevant agencies.

Environmental Protection Agency (EPA)

The submission is generic in nature and no specific observations are made.

Electricity Supply Board (ESB)

Submission welcomes the aim and content of the draft LAP, supporting the ambition of the Town Centre Strategy (chapter 9) and recognises the importance of a strong town centre, highlighting their support for the provision of additional innovation space and employment in the town centre, and in particular the redevelopment of the former ESB site and adjoining lands. The provision of policy CAM-LK-P-1 is welcomed, that will facilitate the development of additional EV charging points within the Plan area, contributing to national targets included in the government's Climate Action Plan.

Department of Transport

Submission refers to updated policy developments relevant to accessible, integrated and sustainable public transport, that should be referenced in the plan:

- National Disability Inclusion Strategy (NDIS) 2017-2022
- United Nations Convention on the Rights of Persons with Disabilities (UNCPRD)
- DMURS Interim Advice Note - Covid-19 Pandemic Response

Submission states that a universal design approach should be taken to the built environment, and a 'whole journey approach' taken to ensure fully accessible public transport for people with disabilities.

Chief Executive's Response: A universal design approach has been considered in all aspects of the LAP, inclusive of the Local Transport Plan. Specifically, LTP-AT-P-2 requires that new developments be designed to DMURS standards including those for vulnerable users and those with reduced mobility.

NIEA Dept. of Agriculture, Environment and Rural Affairs (DAERA)

Natural Environment Division advised at scoping stage that a statement on impacts to NI should be included in the SEA. SEA states that plan is likely to have a negative impact on biodiversity but no specific reference to NI.

Chief Executive's Report - Public Consultation on the Draft Letterkenny Plan and Local Transport Plan 2023-2029

Submission notes that plan is within 15 km of the river Foyle SAC, and is adjacent to river Finn SAC. NIS states there is no hydrological connectivity between the Plan and these 2 Natura 2000 sites, however, despite this these Natura 2000 sites should have been considered as part of the Environmental Assessment.

The Water Management Unit of NIEA - submitted that the LAP should consider any transboundary impacts on the aquatic environment in relation to water quality and WFD.



Chief Executive’s Response: Section 1.4 of the SEA (Scoping) includes a response to the NIEA submission that the Environmental Report shall include all identified transboundary environmental effects. 2 Natura 2000 sites in Northern Ireland were identified within 15km of the Plan Boundary (River Finn SAC (002301) and river Foyle SAC). The WFD Sub-catchment basin for Letterkenny flows towards Lough Swilly and there is therefore no connectivity with the drainage from the Letterkenny Plan area into Northern Irelands river basins.



Section 3, figure 3.1 of the Natura Impact Report (NIR) accompanying the Draft LAP identifies European sites within the likely zone of impact of the plan and within 15km of the plan boundary, including (River Finn SAC (002301) and river Foyle SAC). The NIR objectively concluded that “the plan individually or in combination with other plans, programmes or projects, will not adversely affect the integrity of any European site” (inclusive of transboundary areas).

5.11 Miscellaneous

The table below sets out details of various miscellaneous items that have been raised in the submission.

Ref.	Author	Summary of Submission	Consideration and Recommendation
1	Maria Himler	Submission objects to lands on the Draft Land Use Zoning Map that are zoned as ‘open space’, on the basis that same are currently residential.	<p>This site has an existing residential use.</p> <p>Dwellings immediately to the north of this site on the opposite side of the road are zoned Established Development.</p> <p>It is identified as wholly within Zone B settlement high confidence flood. (for reference, Image 1.2 below illustrates the extent of areas identified as High and Medium future flooding scenarios (CFRAM)).</p> <p>Recommendation: the area identified in image 1.1 below be re-zoned as ‘established development’ - see Recommendation 1, Section 6.9 of this report.</p>

			<p><i>Image 1.1</i></p>  <p><i>Image 1.2 High and Medium future flooding scenarios</i></p> 
2	Philip Robinson	Submission requests that the northern boundary of the plan be extended to include 2 existing dwellings and greenfield sites within.	<p>These lands are at a location on the northern edge of the town boundary in an area of rural character, with access directly onto a county road that also serves several one-off dwellings and a commercial warehouse.</p> <p>Existing dwellings along this road are contained within the Plan boundary and zoned as Established Development. In this context it is appropriate to incorporate the existing dwellings within the Plan boundary and zone as Established Development.</p> <p>Recommendation: the areas delineated in orange on image 2.1 below, be included within the Plan boundary and zoned as 'Established Development' - see Recommendation 2, Section 6.9 of this report.</p>

			 <p><i>Image 2.1</i></p>
3	David Stevenson	Submission queries the inclusion of specific site within area zoned as ATU campus.	<p>This subject lands are currently used for warehouse type commercial development (see map below, lands outlined in yellow) and is not part of the ATU campus.</p>  <p>Recommendation: It is recommended that the lands outlined in yellow be rezoned as Established Development.</p> <p>see Recommendation 3, Section 6.9 of this report.</p>
4	Eoin Gildea on behalf of Martin Shiels	Submission requests the rezoning of lands at Carrygally to Primarily Residential.	<p>The site sits just within the southern plan boundary in an area of rural character.</p> <p>The site is over 2km away from the town centre and nearest local services, at variance with compact sequential growth.</p> <p>Recommendation: No change to the Draft Land Use Zoning Map see</p>

			Recommendation 4, Section 6.9 of this report.
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6.0 Recommendations

6.1 Recommendations in relation to Climate Action

1. Update the LAP to make reference to the Climate Action Plan 2023 in lieu of the Climate Action Plan 2021. **This is considered to be a non-material alteration.**

6.2 Recommendations in relation to Population Projections and Housing Land Supply

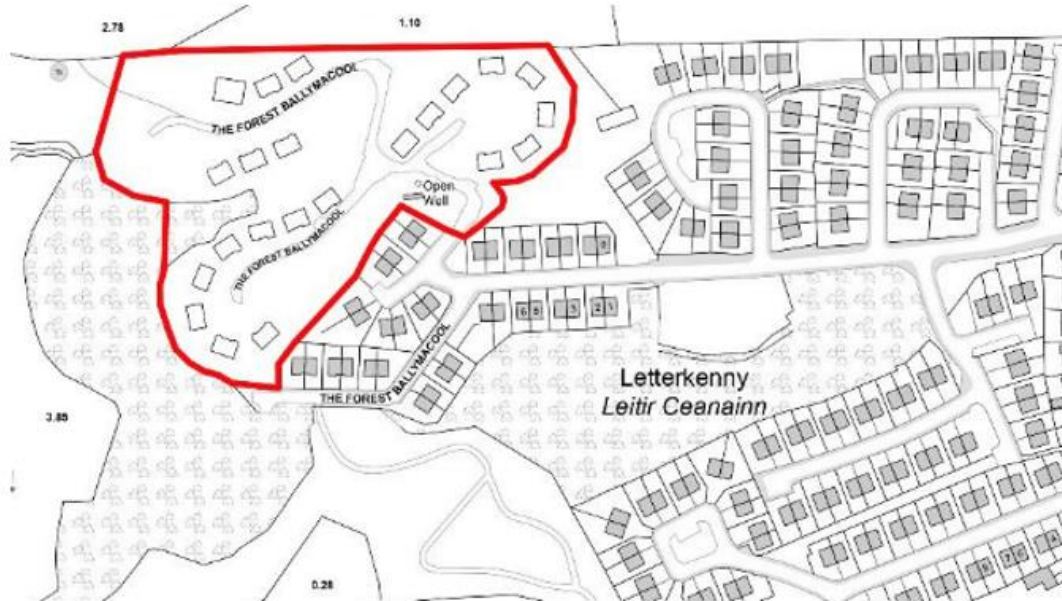
1. Revise the projected population growth figures for Letterkenny to align with the provisions of the NPF and RSES, thereby projecting a population growth of 5720 persons over the 2016 baseline by the year 2029 (as opposed to the projection for an increase of 9881 persons by 2031, as initially set out in the Draft). **This is considered to be a material alteration.**
2. Revise the projected housing figures for Letterkenny set out under Chapter 10 of the Draft LAP taking into account (i.) the provisions of the NPF and RSES, (ii.) the need to provide for future growth in Letterkenny and (iii.) the need to account for recent undersupply in the housing market, thereby providing for the development of approximately 2300 dwellings in Letterkenny out to 2029. **This is considered to be a material alteration.**
3. Revise the housing land requirements set out in Chapter 10 of the Draft LAP to provide for a minimum requirement of 57Ha of housing land (as opposed to the requirement of 119.7Ha to 2031, as initially set out in the Draft). **This is considered to be a material alteration.**
4. Revise the narrative, tables, figures and site numbers contained in the Draft LAP to align with the revised population and housing projections set out in Recommendations 1-3 above. **This is considered to be a material alteration.**
5. Change the zoning of Sites PR15, PR16, PR17, PR18 and PR22 from 'Primarily Residential' to 'Strategic Residential Reserve'. **This is considered to be a material alteration.**
6. Retain the 'Primarily Residential' zoning on Sites PR1 and PR13, **contrary to the recommendations of the Office of the Planning Regulator.**
7. Change the zoning of Opportunity Site 1 from 'Opportunity Site' to 'Primarily Residential'. **This is considered to be a material alteration.**

8. Change the zoning of Opportunity Site 7 from 'Opportunity Site' to 'Primarily Residential'. **This is considered to be a material alteration.**
9. Change the zoning of Opportunity Site 11 from 'Opportunity Site' to 'Primarily Residential'. **This is considered to be a material alteration.**
10. Change the zoning of Opportunity Site 12 from 'Opportunity Site' and 'masterplanned approach' to 'Strategic Residential Reserve'. **This is considered to be a material alteration.**
11. Omit consideration of residential use on Opportunity Site 3. **This is considered to be a material alteration.**
12. Change the zoning of Sites PR9, PR10 and PR11 from 'Primarily Residential' to 'Strategic Residential Reserve'. **This is considered to be a material alteration.**
13. Change the zoning of the 'Strategic Residential Reserve' lands that abut the indicative strategic road corridor on the western side of Letterkenny, from 'Strategic Residential Reserve' to 'Local Environment'. **This is considered to be a material alteration.**
14. Change the zoning of the 'Southern Strategic and Sustainable Development Site' (SSDS) lands to the south of the Leck Road, from 'SSDS' to 'Strategic Residential Reserve'. **This is considered to be a material alteration.**
15. Amend Policy LK-H-P-9a(ii.) to read as follows (new text in blue, deleted text in ~~strike through~~): A well lit and secure pedestrian, **cycling and wheeling** ~~only~~ link shall be provided to the south of the site, to link with the existing footpath running along the northern edge of Regional Road R245. **This is considered to be a material alteration.**
16. Rezone the existing buildings/development to the south of No. 27 Ballymacool Wood (as outlined in red on the image below) from 'Open Space' to 'Established Development'. **This is considered to be a material alteration.**



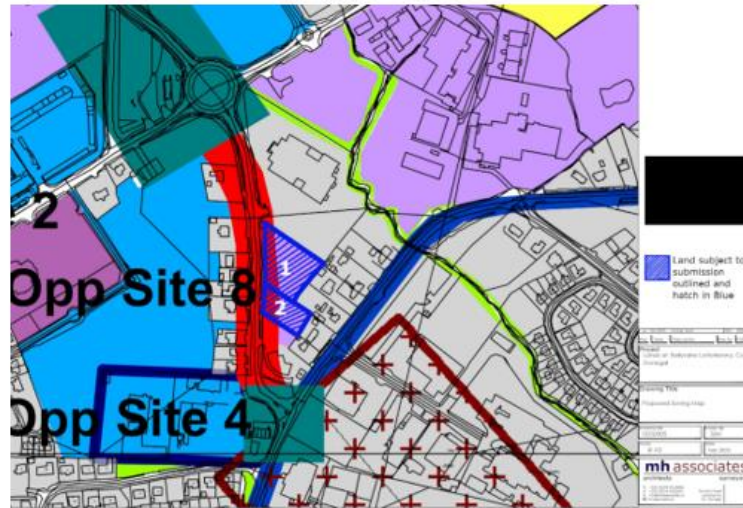
17. Zone the entirety of the area outlined in red on Figure 12 below as 'Established Development' (thereby providing for an additional circa 0.2Ha of 'Established Development' land at this location, over and above that initially identified in the Draft LAP). **This is considered to be a material alteration.**

Fig. 12 - Lands subject of second submission by Kenny Burke on behalf of Donal Gallagher, requesting that all lands outlined red be zoned as Established Development

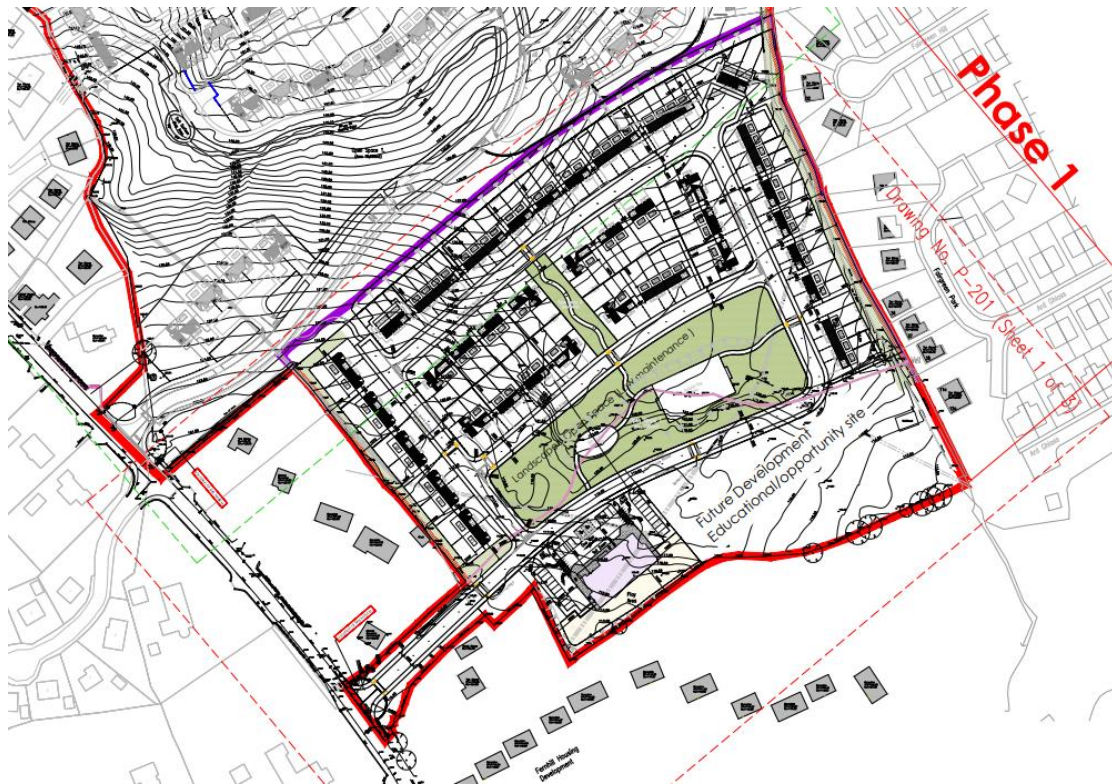


18. Amend footnote 14 that accompanies the land-use zoning matrix set out in Table 7.2 of the Draft LAP as follows (new text in blue) - 'Proposals for residential development on lands zoned Strategic Community Opportunity shall only be considered where they comprise student accommodation. **Such accommodation must be located generally at the southern end of the Strategic Community Opportunity zoning so as to better facilitate active travel.** Proposals for other types of residential development will not be favourably considered on lands zoned Strategic Community Opportunity. **This is considered to be a material alteration.**
19. Amend footnote 10 that accompanies the land-use zoning matrix set out in Table 7.2 of the Draft LAP as follows (new text in blue) - 'Developers are advised to note that professional services, where the services proposed are provided principally to visiting members of the public, will be directed to the defined town centre or to established neighbourhood centres, in accordance with the provisions of Policy LK-EDE-P-3 of this Plan. **Within the Strategic Community Opportunity zoning, office use shall be limited to offices that are ancillary to the primary uses acceptable in principle within this land use zone, namely School / Education, Playing fields, Cultural Uses / Library, Creche / Playschool and Community / Recreational / Sports.** **This is considered to be a material alteration.**
20. Change the zoning of lands outlined in blue (and numbered as plots 1 & 2) in Fig. 3 below from 'General Employment and Commercial' to 'Established Development'. **This is considered to be a material alteration.**

Fig. 3 - Lands subject of submission from DNRP Ltd. & Lexus Projects Ltd.



21. Increase the zoned area of 'Primarily Residential' site PR6 to include the entirety of the area denoted as 'Phase 1' on the site layout plan below. **This is considered to be a material alteration.**



22. It is recommended that no changes to the plan boundary are made on foot of submission ref. 6 (Kathleen Gallagher).
23. Retain the 'Local Environment' zoning on lands subject of submission ref. 27 (MH Associates on behalf of John O Donnell and the O Donnell family).
24. Retain the 'Local Environment' zoning on lands subject of submission ref. 34 (Kenny Burke on behalf of Paul Mc Gettigan)
25. Retain the 'Local Environment' zoning on lands subject of submission ref. 3 (Jim Harley on behalf of GDC).
26. Retain the 'Local Environment' zoning on lands subject of submission ref. 43 (Joe Bonner on behalf of Cillanoir Development Ltd.)
27. Retain the part Strategic Residential Reserve/part Established Development zoning on lands subject of submission ref. 33 (MH Associates on behalf of the Borland family).
28. Retain the Strategic Residential Reserve zoning on lands subject of submission ref. 51 (EG Consulting Engineers).
29. Retain the 'Local Environment' zoning on lands subject of submission ref. 39 (Joe Bonner on behalf of Rosemount Homes).
30. Retain the 'Local Environment' zoning on lands subject of submission ref. 62 (Joe Bonner on behalf of PJ McDermott).
31. Retain the 'Local Environment' zoning on lands subject of submission ref. 62 (Turley on behalf of Magim).

6.3 Recommendations in relation to the Town Centre / Regeneration

1. Amend the legend of the land use zoning map to read 'LK Green Connect' in lieu of 'Indicative Active travel route'. **This is considered to be a material alteration.**

6.4 Recommendations in relation to Flooding and Surface Water Management

1. Insert the following policy into the Town Centre Strategy section of the Draft LAP and amend the accompanying narrative in that section accordingly –

Policy LK-TC-P-xx: It is a policy of the Council to only support the principle of the following uses within that part of the designated town centre that lies East of the Isle Burn and south of the Port Road, subject to the findings of a detailed site-specific flood risk assessment as required:

- a. Water-compatible development, as defined in the Planning System and Flood Risk Management Guidelines;
- b. Expansion of the ATU campus;

- c. Redevelopment/extension of existing commercial units in the area of Port Road/Joe Bonner Link Road where such developments are contained within the existing site, do not give rise to any material net increase in surface water discharge and satisfy the Authority's urban design ambitions for the centre as set out in the Letterkenny 2040 Regeneration Strategy Masterplan;
 - d. Sustainable urban drainage systems and nature-based solutions for the management of rainwater and surface water runoff; or
 - e. Development that accords with the Letterkenny 2040 Regeneration Strategy.
- Comparison and convenience retailing and residential development will not be supported in these areas. **This is considered to be a material alteration.**
2. Review the Strategic Flood Risk Assessment (SFRA) report in consultation with RPS Consulting Engineers and prepare additional 'plan-making justification tests' as necessary in accordance with the provisions of the 'Planning System and Flood Risk Management Guidelines for Planning Authorities'. **This review may result in further material alterations to the Draft LAP, the details of which will be presented to Members prior to publication.**
 3. (i.) Amend the following policies to take account of OPR and OPW commentary in relation to surface water management (new text in blue, deleted text in ~~strikethrough~~):

Policy CAM-LK-P-2: It is a policy of the council to increase native tree coverage and pollinator friendly planting in Letterkenny by requiring the planting of suitable native trees and hedgerows and flowers as part of development proposals, at appropriate locations along public roads, residential streets, parks and other areas of open space, in order to enhance local biodiversity, visual amenity and **sustainable nature-based** surface water management **and drainage approaches**.

Policy CAM-LK-P-6: Policy CAM-LK-P-6: It is a policy of the Council, ~~to require, save in exceptional circumstances, the use of SUDS that all proposals~~ within public and private developments and within the public realm **incorporate** the use of SUDS **as part of a nature-based approach** to minimise and limit the extent of **impermeable** hard surfacing and paving and reduce the potential ~~impact~~ effects of flooding **in accordance with 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (2022)'**.

Policy LK-NBH-P-1: It is a policy of the council to:

- a. Support the principle of the creation of new amenity spaces, amenity corridors and natural biodiversity and wetlands systems adjacent to the River Swilly Corridor ~~subject to detailed considerations and~~. **Such proposals shall include detailed consideration of the importance of, and the integration of, nature-based solutions for surface water management, in accordance with 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (2022)'**, and **be** in line with relevant environmental designations, policies and standards contained in this plan and the CDP; and
- b. Generally require developments adjacent to the River Swilly to 'address' the river by means of incorporating new amenity spaces, amenity corridors, natural biodiversity and

wetlands systems and publicly accessible active frontages, save in exceptional circumstances.

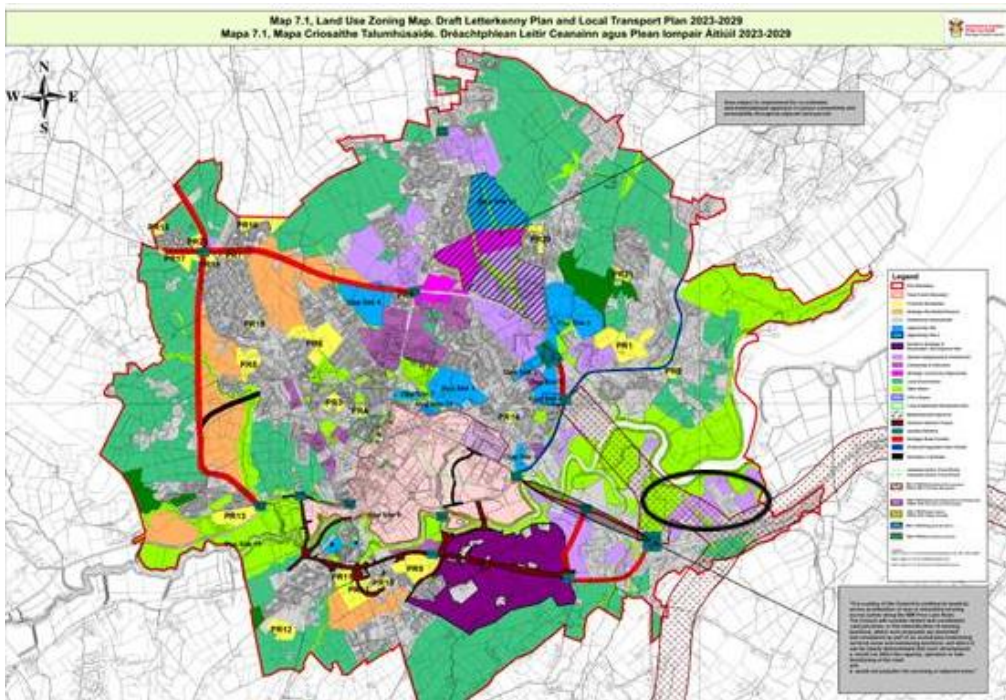
(ii.) Insert the following new Objective into Section 12.4 of the Draft LAP -

CAM-LK-O-3: It is an objective of the council to ensure that flood risk management measures in Letterkenny consider and provide for effective climate change adaptation, as set out in the OPW Flood Risk Management Climate Change Sectoral Adaptation Plan (OPW 2019).

The foregoing policy alterations/new objective are considered to constitute material alterations.

6.5 Recommendations in relation to Commercial Submissions on Lands Outside Town Centre

1. Change the 'General Employment and Commercial' land use zoning as contained in the ellipse on the map below from general employment to 'Open Space'. **This is considered to be a material alteration.**



2. Rezone the area outlined in red on Fig. 25 below, from 'Established Development' to 'General Employment and Commercial'. **This is considered to be a material alteration.**



Fig. 25 Eamon & Drew Blaney

3. Retain the 'Open Space' zoning on lands subject of submission ref. 22 (MH Associates on behalf of John Crossan & Sons (Letterkenny Ltd).
4. Retain the 'Local Environment' zoning on lands subject of submission ref. 42 (Joe Bonner on behalf of Cillanoir Development Ltd.).
5. Retain the 'Open Space' zoning on lands subject of submission ref. 29 (Michael Friel on behalf of Desmond Shiels).
6. Change the zoning of the lands subject of submission ref. 44 (Patrick Dorrian) from Open Space to General Employment and Commercial.
7. Retain the Open Space zoning on lands subject of submission Ref. 24 (MH Associates on behalf of Michael Donaghey).
8. Retain the Open Space zoning on lands subject of submission Ref. 46 (MH Associates on behalf of Christopher McG Ltd).

6.6 Recommendations in relation to the Local Transport Plan

Active Travel

1. Delete Map 19.2: 'Active Travel Indicative Proposals Overview' and replace with Map 19.2A: 'Proposed Walking Network'; and Map 19.2B: 'Proposed Cycling Network' as contained in Appendix C and Appendix D respectively.

2. Delete Table 19.1: Compilation of Identified Active Travel Schemes and replace with new Table 19.1A: Proposed Walking Schemes.

Proposed New Table 19.1A

Table: 19.1A	
Scheme No. on map	Location
S.1*	High Road - Improvements to network.
S.2*	Glencar Road - improvements to the network.
S.3*	Windy Hall Road - improvements to the network.
S.4*	Circular Road - improvements to the network.
S.5*	Kilmacrenan Road/Devalera/Gortlee - improvements to the network.
S.6*	Ballyraine Road/Gortlee Rd/Old Farm Road - improvements to the network.
S.7*	Ballymacool & Oldtown.
S.8*	Convent Road (from Circular Road to junction with Ballymacool terrace.
S.9*	Port Road – Improvement and enhancement to town centre Boulevards.
S.10*	Pearse Road - Improvement and enhancement to town centre Boulevards.
S.11*	Neil T Blaney Road - Improvement and Enhancement to town centre Boulevards.
S.12*	Long Lane to Kilmacrenan Road via Errigail College – permeability linkages
S.13*	Long Lane – Windyhall/ Errigail College - permeability linkages
S.14*	Long Lane through to Fairgreen Park, 'Paddy Kellys farm' and onto Glencar - permeability linkages
S.15*	Knocknamona Roundabout to Hospital Roundabout – improvements to the network.
S.16*	Link from former Oatfield site through to High Road - permeability linkages.
S.17*	Link from Ramelton Road through LYIT to Port Road - permeability linkages.
S.18*	Link through open land from Tesco shopping centre through to Devalera Road - permeability linkages.
S.19 (derived from ATOS tool).	Gael Scoil Adhamháin, Glencar - permeability linkages.

S.20*	Link from Glenwood Park and onto New Line Road - permeability linkages.
S.21*	Lisnenan in SW direction linking through Employment lands to the Business Park Road.
S.22	Permeability Linking Beinn Aoibheann Housing development into IDA to east.
S.23	2 no. signalized pedestrian on demand crossings on Business Park Road
Town Centre Interventions, Linkages and Proposals: Schemes listed 24-31 are all illustrated on Map Below.	
S.24	Letterkenny Green Connect, (Phase 1 complete April 2023).
S.25	Multi Modal Transport Hub and public transport corridor.
S.26	Linkages and permeability schemes across the Town centre (1-22 contained within Linkages and Public Space Action Plan).
S.27	Burtonport- Letterkenny Strategic Greenway.
S.28	Multi-Modal infrastructure along the Southern network scheme. Currently at Phase 2 of TII's PMG. Including pedestrian bridge crossing from Oldtown neighbourhood to Town Centre.
S.29	Multi Modal infrastructure on 4 lane carriageway including 'Park and Share modal Hub(s)'.
S.30	River Swilly walkway.
S.31	Urban Wetland Park.

Public Transport

1. Delete Map 22.1: 'Indicative Additional Bus Routes' and insert replacement Map 22.1 (refer Appendix E) to include:

- a. the positive identification of the preferred location of the proposed Regional Transport Hub (RTH), and how it interacts with the existing and proposed bus routes network and the proposed town centre active travel networks.
- b. the positive identification of a potential dedicated bus corridor from the Dry Arch Roundabout to the Regional Transport Hub;

2. Insert policy support for the development of 'Park & Share/Ride Modal Hubs' that will incentivise the use of buses. The TEN-T project includes such a facility inside of the Plan boundary in the Bonagee area. The Project includes additional sites to be developed under Section 3 between Letterkenny and Lifford, including one at the Manorcunningham Roundabout.

Policy LK-T-P-?: To support the development of park and share/ride hubs.

3. Insert policy support for public transport interventions as below:

Policy LK-T-P-?: To support physical interventions that enable the expansion of Letterkenny's public transport services.

4. Insert narrative support for the principle of the development of additional hubs in the commuter villages, notably Kilmacrennan, Ramelton, and Newtowncunningham where they would be serviced by regular and efficient 'Connecting Ireland' and 'Local link' public transport services; and to insert policy support in the emerging Draft County Development Plan.

5. Insert commentary around the NTA's '*Connecting Ireland: Rural Mobility Plan*'.

6. Retain Policy LTP-PT-P-2(b) to: '*not protect the abandoned historic railways corridors within the Letterkenny Plan area boundary for strategic infrastructure provision (such as rail/road/greenway projects) or for recreational development.*'

Southern Network Project

Delete the two indicative 'Strategic Road Corridor' lines identified on the Draft Zoning Map (and other diagrams as required) to the east of the Southern Network Project, and insert an objective and (associated narrative) as follows:

LK-O-T-? To connect the Southern Network (Multi-Modal) Project on its eastern side with the national multi-modal network to the north/east via a further multi-modal section. (non-material narrative to be submitted later in process)

Northern Network Project

Retain the Northern Network Project (formerly Northern Relief Road) and insert non-material narrative setting out rationale for doing so (non-material narrative to be submitted later in process).

Western Network Project

1. Retain the Western Network Project (formerly Western Relief Road) and insert non-material narrative setting out rationale for doing so (non-material narrative to be submitted later in process).
2. Amend 'Strategic Residential Reserve'-zoned lands in vicinity of Western Network Project to 'Local Environment'.

ILUTS Modelling

1. Insert revised narrative at Section 15.4 as follows (text to be deleted shown in ~~strikethrough~~; new text in blue):

~~Letterkenny Integrated Land Use and Transportation Study: 2009 (ILUTS). In 2008 Donegal County Council commissioned the preparation of the 'Letterkenny Integrated Land Use and Transportation Study' (ILUTS) to identify detailed transportation and land use proposals for the future sustainable growth of the town. The Study includes preferred transportation strategies for 'sustainable modes' and 'roads based' options based on transportation model development. A review was conducted in 2019 to ensure the strategies and recommendations made remain valid. This review concluded that this was the case. However given that 2 of the 3 forecast years contained within the ILUTS have since passed, it was concluded at the outset of the preparatory stage of the LTP that a more detailed review should be conducted when the Draft Plan was approved.~~

Consultants were contracted in 2019 to undertake traffic modelling for the Plan. The 2009 ILUTS model was used as a base starting point, and 2017 Present Year Validations of the ILUTS model were progressed including:

- Reviewing developments in Letterkenny between 2009 and 2017;
- Application of traffic growth in Letterkenny between 2009 and 2017;
- Changes and upgrades to the network between 2009 and 2017 (and subsequently the new Kilty junction arrangements); and
- Completing a calibration and validation exercise to the Project Appraisal guidance acceptability criteria.

Using this updated base model, three forecast year demand scenarios were developed to reflect a phased implementation of the draft Land Use Plan.

The following interventions were then tested in the forecast models:

- TEN-T
- Southern Network Project; and
- 10% reduction in demand proxy test to represent a shift to sustainable modes.

A review was also undertaken of the 2019 and 2022 TII traffic counters situated on three main corridors into Letterkenny. This analysis indicated that 2022 traffic volumes and temporal profiles had broadly returned to a pre Covid-19 level.

N56 Letterkenny Urban

Four Lane Section

1. Insert new narrative and Policy (text to be deleted shown in ~~strikethrough~~; new text in *blue italics*):

Upgrades to the existing N56 Four Lane Road are nearing completion. Designed to Design Manual for Urban Roads (Government of Ireland: April, 2013) standards, the upgrades will provide for a speed limit of 60kph, full segregation of carriageways, removal of all but two right turning junctions and full Active Travel (pedestrian and cycle) facilities on both sides of the road including two signalised crossings. As a Primary corridor, new access onto the N56 Four Lane Road must still be restricted. It is proposed that development lands to the south served by the Southern Strategic Network project may be accessed by a single improved junction to the N56, replacing the existing Cullion Road junction. For existing lands to the north immediately adjacent to the N56 Four Lane Road, it may be considered appropriate given the new upgraded design to allow a restricted number of new left-in/left-out accesses, subject to appropriate assessment.

Policy LK-EDE-P-2: ~~It is a policy of the Council to continue to avoid an ad-hoc proliferation of new or intensified existing access points along the N56 Four Lane Road. The Council will to consider limited and coordinated new junctions, or the intensification of use of existing junctions, where such proposals are presented and considered as part of an overall plan maximizing serviced areas and minimizing junctions, and where it can be clearly demonstrated that such development:~~

- ~~a. would not affect the capacity, operation or safe functioning of the road; and~~
- ~~b. would not prejudice the servicing of adjacent areas.~~

Policy LK-T-P-?: Development of lands to the south of the N56 Four Lane Road may only be accessed via the existing local road junctions or alternatively by a single improved junction to the N56, replacing the existing poorly aligned Cullion Road and junction. For existing developed and developable lands to the north and adjacent to the N56 Four Lane Road and for which no other existing access is available, these may be accessed by a restricted number of new left-in/left-out accesses, subject to the safety and carrying capacity of the National Road being maintained.

Creamery Roundabout to Knocknamona Roundabout (Business Park Road)

1. Insert new Policy (text to be deleted shown in ~~strikethrough~~; new text in *blue italics*):

Objective LK-ED-O-2: ~~It is an objective of the Council to safeguard the carrying capacity, functioning and safety of urban sections of the N56 National Secondary Route in Letterkenny as a key strategic transport corridor, lifeline route and multimodal urban connector. The Council will ensure that any development seeking direct access or that would result in the intensification of use of existing access points or junctions is designed and assessed to ensure that the capacity, operation and safe function of the N56 are preserved and/or improved. Where applicable, any development will tie in with any established or developed Junction Strategy/Policy for this key route as and where such are set out.~~

Policy LK-ED-P-?: Development proposals requiring access to the N56 Business Park Road shall only be permitted where such proposals are consistent with the Council's strategy to:

- a. provide new/improved Active Travel facilities along and across the N56;*

- b. *provide two new Primary signalised junctions and rationalise existing junctions and accesses to enable permeability across the N56 for non-motorised users and to facilitate improved function and efficiency on the N56; and*
- c. *implement a reduced speed limit to provide consistency along the N56 and to facilitate junction arrangements.*

2. Amend wording of narrative at Section 8.2: 'National Secondary Route N56' as follows (additional text in *blue italics*): "...this road is a critical means of access to areas of significant development in Letterkenny, most notably the employment area *and Strategic Community Opportunity* centred on the N56 Business Park Road".
3. Insert additional narrative at Section 8.12 (new text in blue):

'The identification of lands for the provision of additional community related development and expansion, particularly in the areas of education and health is necessary in ensuring long-term supply of land to meet key strategic needs of these essential services. These lands are located close to the existing service provision at the Letterkenny General Hospital campus where linkages with the existing health uses may be appropriate. Also, the lands are located within reasonable walking distance of key transport corridors and therein are accessible to the Town Bus Service providing valuable opportunities for expansion of services provided through the Atlantic Technological University

Polestar Roundabout to Creamery Roundabout

Insert new Policy:

Policy LK-T-P-?: To signalise and rationalise the existing junctions and to provide new and improved Active Travel facilities along and across the N56, including potential road-space re-allocation where feasible, in conjunction with the signalised junctions.

N56 Knocknamona Roundabout to Mountaintop

Insert new Policy:

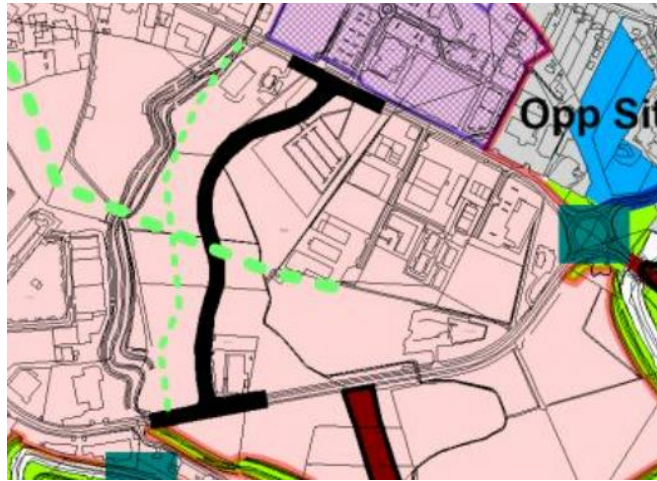
Policy LK-T-P-?: to provide new/improved Active Travel facilities along and across the N56 to improve connectivity and permeability for pedestrians and cyclists. It is also proposed to rationalise existing junctions and accesses by providing new Primary Junctions to improve safety, connectivity, permeability, function and efficiency of this section of the N56 for all road users.

6.7 Recommendations in relation to NWRA Observations

1. Insert the Regional Growth Centre Strategic Plan boundary into the Draft LAP.
2. Insert 'Action': The Planning Authority will undertake a building heights study under the umbrella of the Letterkenny 2040 Regeneration Strategy.

6.8 Recommendations in relation to ATU Town Centre Lands

1. Delete the indicative 'developer led road' (shown in thick black outline on map below) from the town centre area of the land-use zoning map. **This is considered to be a material alteration.**



2. Retain the 'ATU campus' designation as originally published in the Draft LAP, without modification.

6.9 Recommendations in relation to Miscellaneous submissions

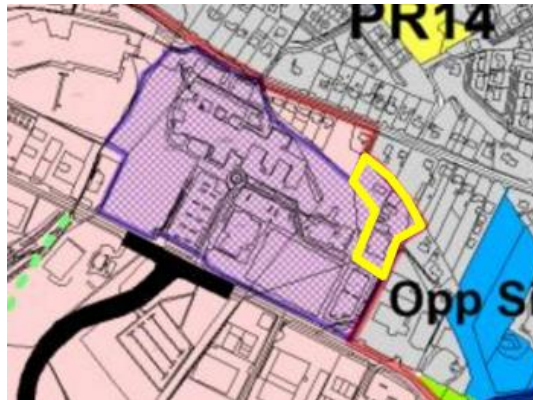
1. Change the zoning of the lands subject of submission ref. 14 (Maria Himler) as outlined in red below, from Open Space to Established Development.



2. Include the areas delineated in orange on the image below (subject of submission ref. 11 – Philip Robinson) within the Draft LAP boundary and zone said lands as 'Established Development'.



3. Change the zoning of the lands outlined in yellow below (subject of submission ref. 30 – David, Anne and Jean Stevenson), from 'Town Centre' and 'ATU Campus' to 'Established Development'.



4. Retain the 'Local Environment' zoning on lands subject of submission ref. 40 (EG Consulting on behalf of Martin Shiels).

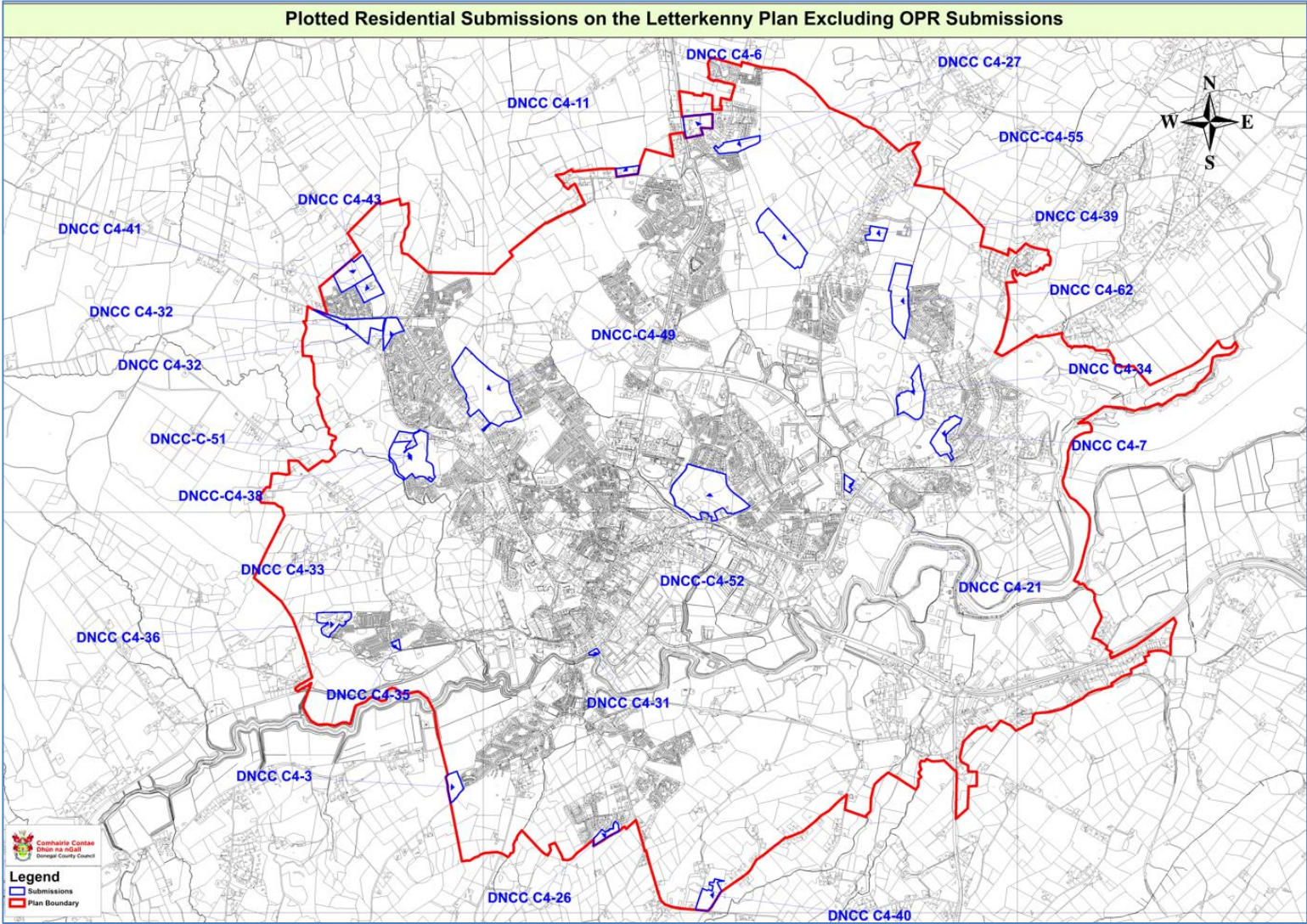
Appendix A – List of Persons or Bodies that made Submissions

Submissions received during public consultation period on Draft Letterkenny Plan.	
DNCC-C4-1	Health and Safety Authority
DNCC-C4-2	Irish Aviation Authority
DNCC-C4-3	GCD (IRL) Ltd c/o Jim Harley
DNCC-C4-4	Environmental protection Agency
DNCC-C4-5	Richard Logue
DNCC-C4-6	Kathleen Gallagher
DNCC-C4-7	Victoria Properties Trading Ltd C/o Jim Harley
DNCC-C4-8	Joseph McCafferty
DNCC-C4-9	Donegal County Council, Road Design Department.
DNCC-C4-10	Peter Adlard
DNCC-C4-11	Philip Robinson
DNCC-C4-12	Office of Public Works
DNCC-C4-13	Derry City & Strabane District Council
DNCC-C4-14	Maria Himler
DNCC-C4-15	James Mc Fadden
DNCC-C4-16	Jim Doherty
DNCC-C4-17	Letterkenny Chamber
DNCC-C4-18	ESB
DNCC-C4-19	OPR
DNCC-C4-20	Eamon & Drew Blaney
DNCC-C4-21	MH Associates on behalf of DNRP & Lexus Projects Ltd.
DNCC-C4-22	MH Associates on behalf of John Crossan & Sons (Letterkenny Ltd)
DNCC-C4-23	Transport Infrastructure Ireland

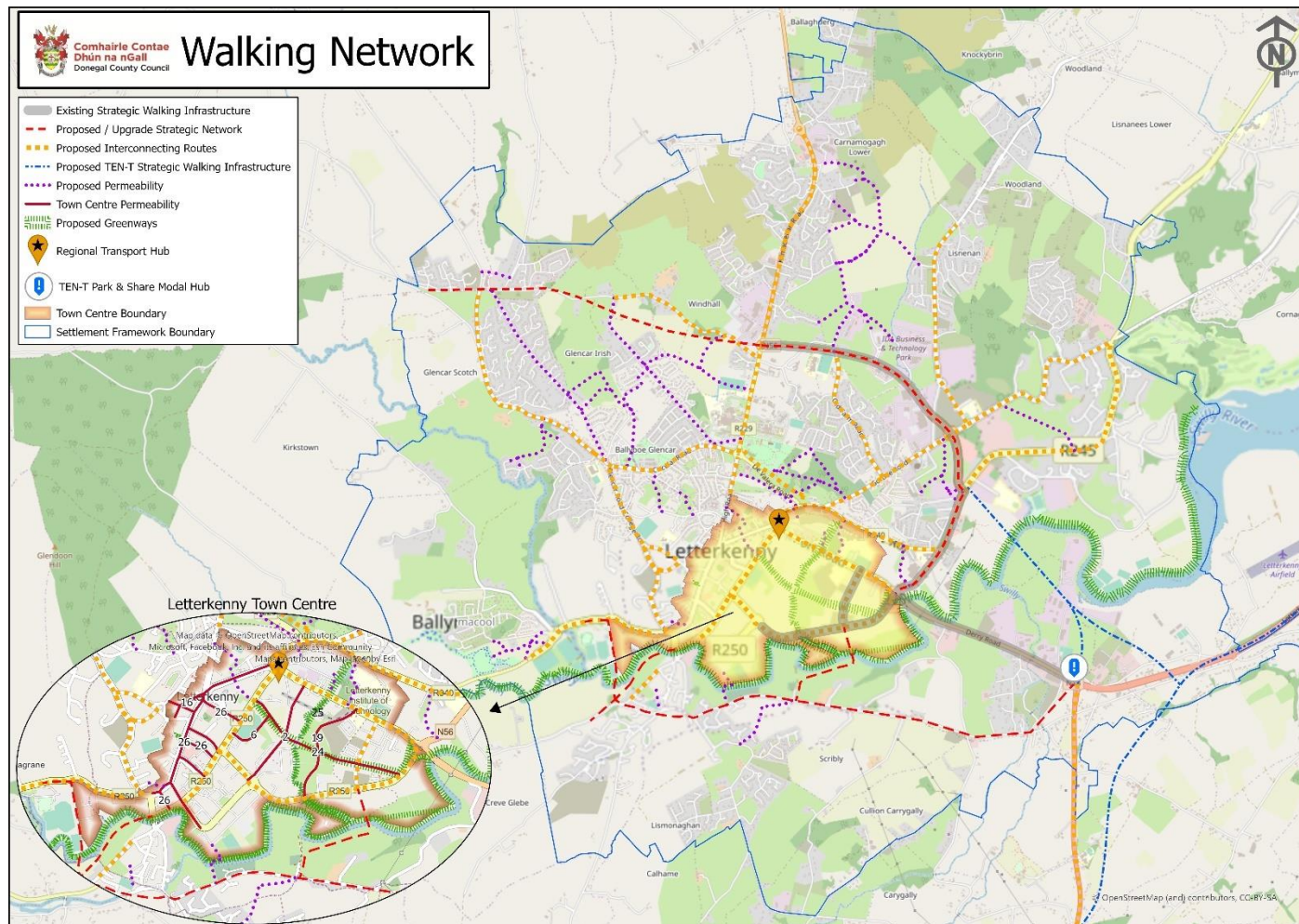
DNCC-C4-24	MH Associates on behalf of Michael Donaghey
DNCC-C4-25	PJ Callaghan
DNCC-C4-26	John Mc Callion
DNCC-C4-27	MH Associates on behalf of John O Donnell and the O Donnell family.
DNCC-C4-28	Department of Transport
DNCC-C4-29	Michael Friel on behalf of Desmond Shiels
DNCC-C4-30	David, Anne and Jean Stevenson
DNCC-C4-31	Kenny Burke on behalf of Connor Mc Gettigan
DNCC-C4-32	Kenny Burke on behalf of Sean Gallagher
DNCC-C4-33	MH Associates on behalf of the Borland family.
DNCC-C4-34	Kenny Burke on behalf of Paul Mc Gettigan
DNCC-C4-35	Kenny Burke on behalf of Donal Gallagher
DNCC-C4-36	Kenny Burke on behalf of Donal Gallagher
DNCC-C4-37	DAERA
DNCC-C4-38	Turley on behalf of Apex Housing Association (Ireland Ltd)
DNCC-C4-39	Joe Bonner on behalf of Letterkenny Rosemount Homes Ltd.
DNCC-C4-40	EG Consulting Engineers Ltd on behalf of Martin Shiels
DNCC-C4-41	MH Associates on behalf of Christopher McG LTD (Residential).
DNCC-C4-42	Joe Bonner on behalf of Cillanoir Development LTD (Commercial).
DNCC-C4-43	Joe Bonner on behalf of Cillanoir Development Ltd (Housing)
DNCC-C4-44	Patrick Dorrian Glencar shopping Centre Ltd
DNCC-C4-45	National Transport Authority
DNCC-C4-46	MH Associates on behalf of Christopher Mc G Ltd (Commercial)
DNCC-C4-47	void
DNCC-C4-48	Department of Education
DNCC-C4-49	Joe Bonner on behalf of PJ Mc Dermott (Glencar)
DNCC-C4-50	Department of Housing, Local Government and Heritage.
DNCC-C4-51	EG Consulting Engineers Ltd.

DNCC-C4-52	Turley on behalf of the Robinson Family
DNCC-C4-53	Irish Water
DNCC-C4-54	Turley on behalf of Hurley Property ICAV, for and on behalf of its sub fund National Property Fund.
DNCC-C4-55	Turley on behalf of Magim Ltd
DNCC-C4-56	Department of the Environment Climate and Communications.
DNCC-C4-57	Northern and Western regional Assembly
DNCC-C4-58	The Sweeney family
DNCC-C4-59	Turley on behalf of IDA Ireland.
DNCC-C4-60	Donegal ETB
DNCC-C4-61	Atlantic technological University
DNCC-C4-62	Joe Bonner on behalf of PJ Mc Dermott (Castlebane).

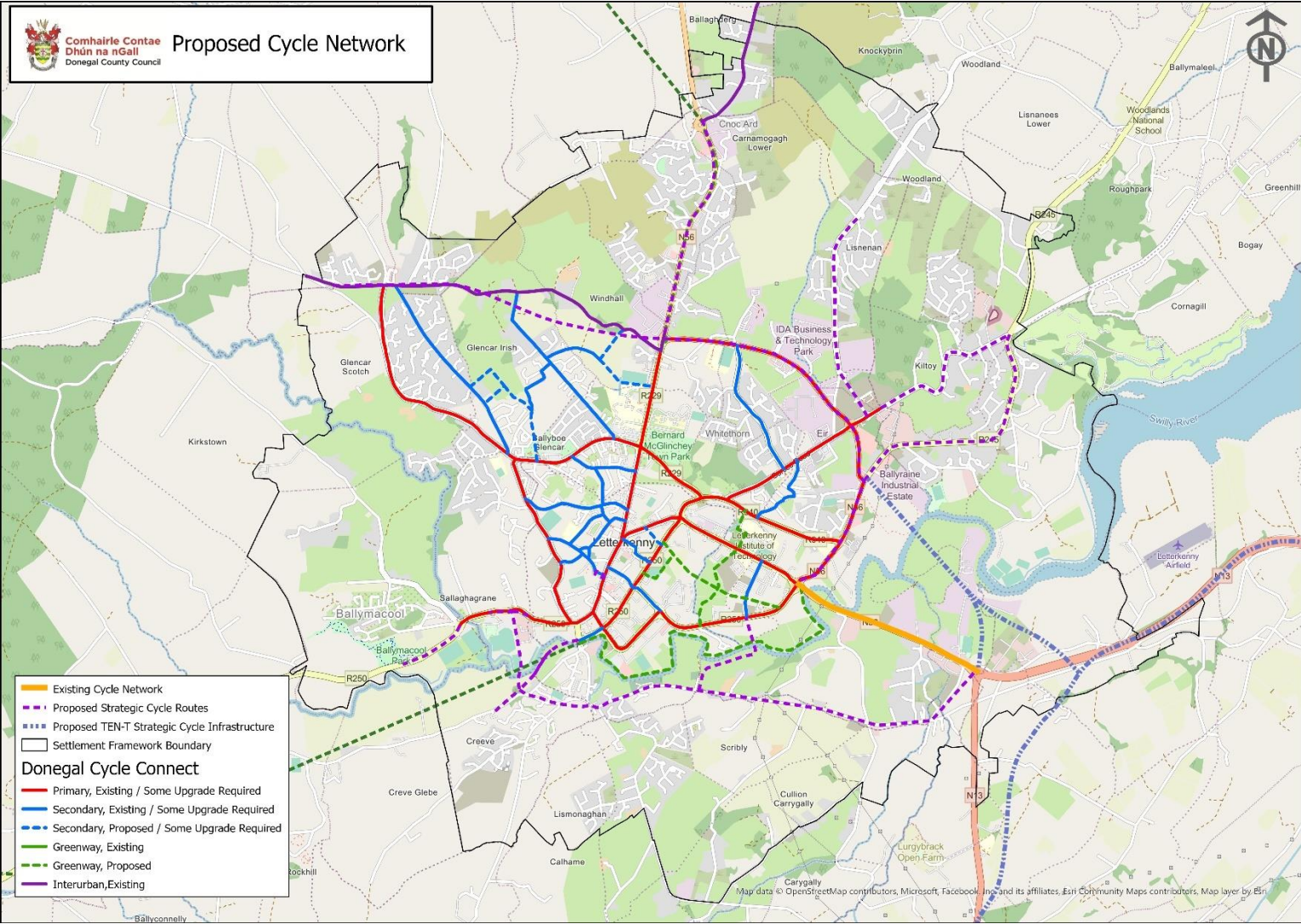
Appendix B – Location of lands subject of ‘residential’ submissions (excluding OPR)



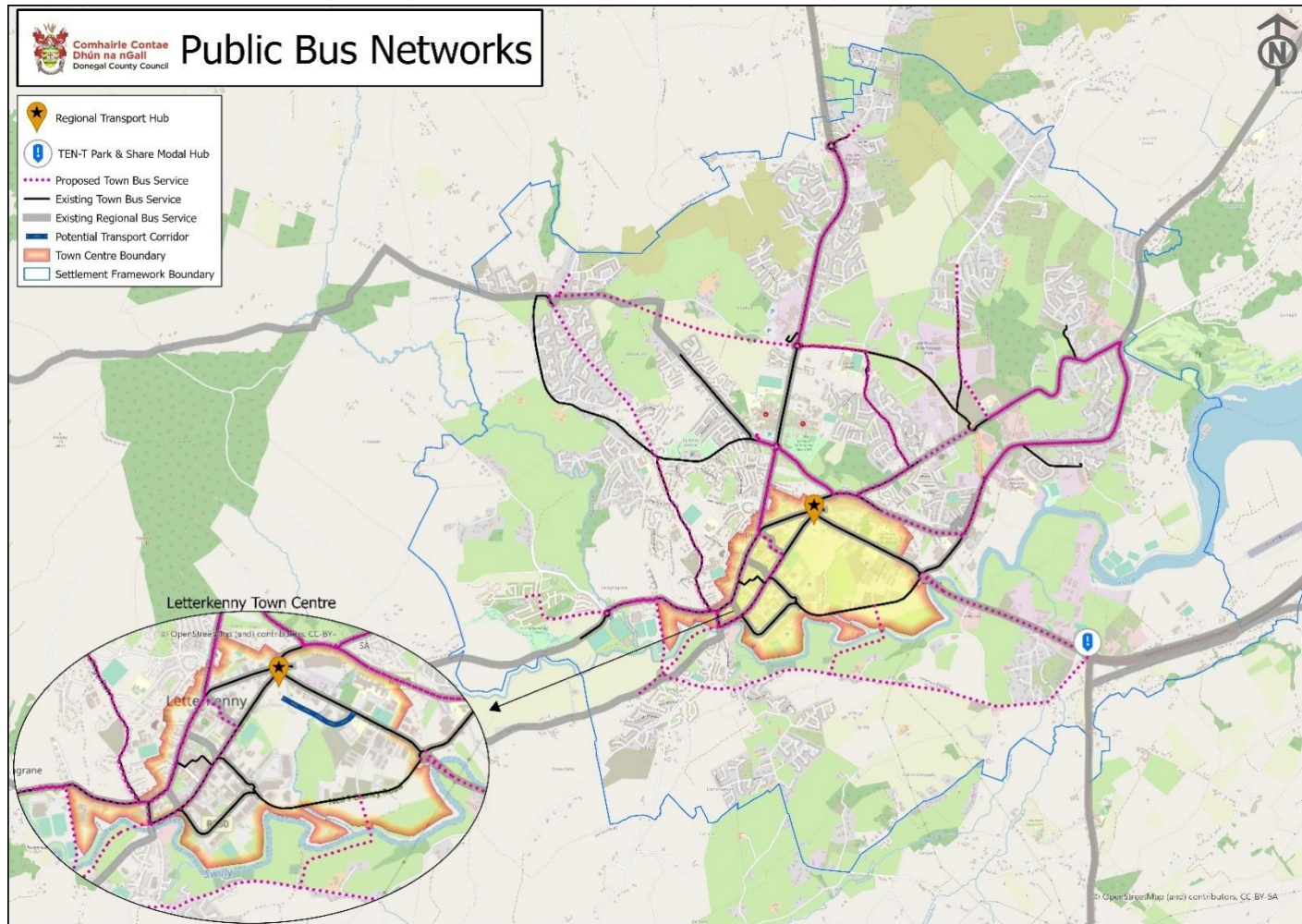
Appendix C – Map 19.2A Active Travel Walking Map



Appendix D – Map 19.2B Proposed Cycling Network



Appendix E – Map 22.1 Public Transport Network



Appendix F – Presentation on Historic Railway Corridors

Analysis of the Integrity of the Historic Letterkenny to Derry (Londonderry and Lough Swilly 1883-1953) and Letterkenny to Strabane (Strabane and Letterkenny 1909-1960) Railway Lines in the Vicinity of Letterkenny

Blue = uncompromised section, Red = compromised by buildings, roads, car parks, yards, gardens etc.

