

**Letterkenny Plan and Local Transport Plan,
2023-2029**

**Notice of Intention by the Minister for Local
Government and Planning to Issue a Direction to the
Council**

**Chief Executive's Report on the Public Consultation
[per Section 31(8), Planning and Development Act,
2000 (As Amended)]**



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

20th February 2024

1.0 Introduction

1.1 Background

The Letterkenny Plan and Letterkenny Transport Plan 2023-2029 was formally made by the Elected Members of Donegal County Council on 13th November 2023. The Plan took effect from 3rd January 2024 with a plan duration of 6 years until 2029.

As required under Sections 31AO(5) of the Planning and Development Act, 2000 (As Amended) the Planning Authority issued notification of the Plan's adoption to the Office of the Planning Regulator (OPR). The Chief Executive also informed the OPR of the decision of the Authority not to comply with certain recommendations made in the relevant report of the OPR, together with reasons for the decision of the Authority.

On 20th December 2023 the Minister of State for Local Government and Planning issued a 'Notice of Intention to Issue a Direction' to the Planning Authority under Section 31 of the Planning and Development Act, 2000 (As Amended) ('the Act'). The Draft Direction concerns the zoning of six parcels of land in the town, that, in accordance with Section 31(6) of the Act, 'shall not have effect', notwithstanding their inclusion in the Plan as adopted by the Council and pending the issuing of the Minister's Final Direction.

1.2 Public Consultation

In accordance with the requirements of Section 31(7) of the Act, the Planning Authority commenced a period of public consultation on the Minister's Notice of Intention to Issue a Direction' for a period of 2 weeks **between the 12th January and 25th January 2024 inclusive**. Public notices advising of the statutory consultation process were placed in local newspapers, and relevant documents were made available for inspection in local offices and libraries and on the Council's website.

1.3 Legislative Requirements of Report/How the Report is Organised

In accordance with Section 31(8) of the Planning and Development Act, the Chief Executive's report is required to:

- Summarise the views of any person who made submissions or observations to the planning authority;
- Summarise the views of and any recommendations (if any) made by the elected members of the planning authority;
- Summarise the views of and any recommendations (if any) made by the regional assembly;
- Make recommendations in relation to the best manner in which to give effect to the draft direction.

1.3.1 How the Report is Organised

- Section 2.0: Summaries of Submissions (including those of NWRA).
- Section 3.0: Submissions Considered Outside of Scope of Draft Direction.
- Section 4.0: Summaries of Views/Recommendations of Members.
- Section 5.0 Chief Executive's Recommendations
- Appendix A: Copy of the Draft Ministerial Direction.
- Appendix B: List of persons that made submissions.

2.0 Consideration of Submissions

2.1 Overview

In total, sixteen submissions or observations were received during the consultation period:

- thirteen from private parties; and
- three from statutory bodies (the Northern and Western Regional Assembly (NWRA); Uisce Eireann; and the Department of Education).

The NWRA submission refers to all six sites. These comments are summarised in each of the respective sub-sections dealing with each individual Draft Direction element (rather than collectively under one sub-section).

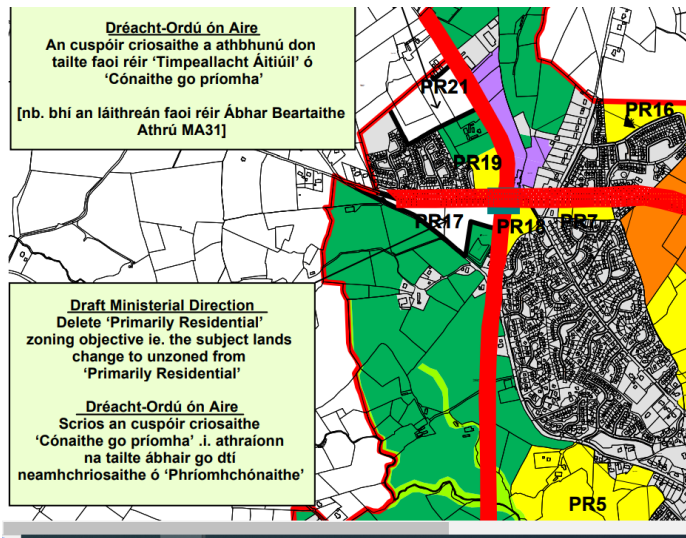
The submissions from Uisce Eireann and the Letterkenny Chamber of Commerce do not refer to individual elements of the Draft Direction but do refer to the general position around housing supply. Given that four of the six items in the Draft Direction are sites for housing, these submissions are considered relevant and therefore are addressed below.

Other than the NWRA's specific comments, five of the six items were the subject of one specific submission, each whilst the Castlebane housing site item was the subject of five specific submissions in addition to that of the NWRA.

Sections 2.2 to 2.8 summarise the submissions pertaining to specific items in the Draft Direction.

Three submissions are considered not relevant to the Draft Direction (the reasons for this conclusion are set out in Section 3 of the report).

2.2 Delete the following zoning objective from the adopted plan, i.e. the subject land is unzoned: PR 17 Glencar Scotch and Killyclug – i.e. the subject lands change to unzoned from Primarily Residential.



Two specific submissions received:

DNCC-C42-3 Kenny Burke on behalf of Sean Gallagher

Mr Gallagher strongly objects for the following reasons:

1. The reasons given in the Draft Direction are not accurate nor adequate. States that whilst the land zoning exceeds what is required for the town as set out in national and regional policy objectives, the targets provided in the RSES are minimum growth targets. The site itself is within the CSO boundary.
2. The Lands are an infill/consolidation site within a neighbourhood centre. This site is immediately south of existing neighbourhood services such as shops, service station, pub and restaurant.
3. The RSES has identified this neighbourhood area as a strategic area for residential development and draws upon international experience on the benefits of compact settlements and the 15 min city. The submission refers and quotes from '*Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities*'.
4. The Draft Direction is predicated upon the Growth Targets stated in the RSES being exceeded but these are stated as 'minimum targets' and therefore the fact that the quantum of land zoned is above the minimum target means that the plan is consistent with the RSES and not contrary to it as stated in the Draft Direction.
5. This site has a valid application with Donegal County Council for Social Housing through Turnkey Acquisition. On the basis of this Turnkey Acquisition application and the much needed social housing in Letterkenny, the planning design drawings/documents are at an advanced stage for submission to Donegal County Council Planning Department.
6. The site had the benefit of planning permission in 2007 which was reviewed and granted an Extension of Duration to 2018, having been considered to accord with the principles of proper planning and sustainable development.

The submission concludes by stating that the OPR and Minister have not understood the context of the Plan as made by the Planning Authority and in making the plan without PR 17 it

would be inconsistent with the RSES and the recently published Guidelines. The environmental assessment has been undertaken by the Planning Authority on the basis that this site is zoned and the support it will have for the neighbourhood is understood to be positive. The rezoning will have potential significant environmental impacts in particular upon Human Health and Material Assets, and they have not been assessed by the Minister.

Housing supply in Letterkenny, including social housing, is a significant constraint to the achievement of the vision and ambition for Letterkenny to grow as a regional centre of scale and as part of the North-West City Region.

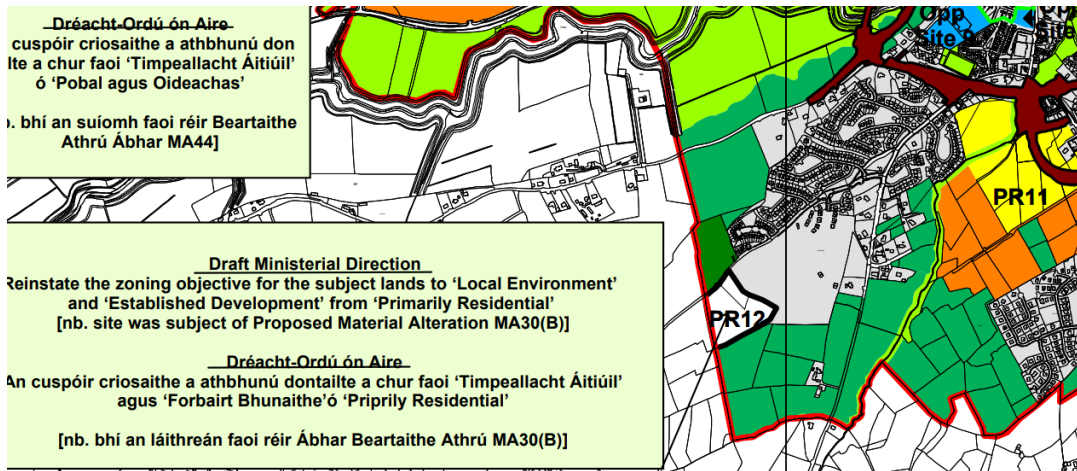
DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Does not support the Draft Direction. Describes the site as being located adjacent to an extensive residential neighbourhood, with several hundred houses to the east. Also notes that there is a neighbourhood shop / filling station, fast food outlet within very close proximity of these lands (200 – 300m walk). This is an established neighbourhood focal point with a number of established services, which renders the site as falling within the definition of consolidation of the overall Killylastin / Killyclug area, and whilst this residential area does lie at the north-western margins of Letterkenny, it has the characteristics of a neighbourhood which is already fixed, with scope for residential expansion.

The Ministers Statement of reason also cites a lack of consistency with the principles of the RSES (People & Places), and RPO 3.1 and 3.2 are applicable in this instance. However, the Regional Growth Centre Strategic Plan for Letterkenny, as set out in Sec. 3.7(b) of the RSES outlines Killylastin (Glencar Scotch) as an area for new residential development, based on the aforementioned neighbourhood model.

Accordingly, the NWRA state that they consider the residential zoning proposed for this site to be appropriate.

2.3 Reinstate the following zoning objectives and associated text to that of the draft plan: MA30(B) PR12 Creeve – i.e. the subject lands revert to Local Environment



Two specific submissions received:

DNCC-C42-14 : Harley Planning Consultants on behalf of GDC (Irl) Ltd.

- GDC considers there to be an error as the subject lands are not outside the CSO boundary and is an example of sequential compact growth and would constitute development in a manner that is consistent with the Letterkenny Plan 2023-2029. The submission questions what they believe to be the OPR's contradictory recommendations.
- Suggests that the Draft Direction on the subject lands is contradictory to one of its earlier comments at the Draft Plan stage. The submission includes a map with the plan boundary and what they believe to be the CSO boundary.
- The submission confirms the availability of services of the subject land and the identification of the Planning Authority that the lands are tier 1 serviced zoned lands.
- The submission goes into detail regarding UE comments on water and wastewater availability in this area of the town. Developer-led infrastructure is more likely to occur on the subject lands as opposed to other lands zoned in the area for Primary Residential.
- States that the lands located on the edge of the plan boundary do not leapfrog other lands are located close to the town centre and adjoin existing residential development.

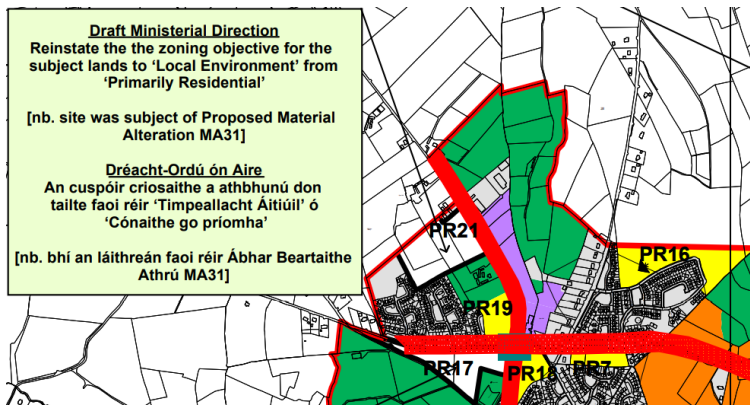
DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Opinion: The subject lands are peripheral, and are located at the southern edge of the town boundary, given the extent of alternative lands closer to the Centre of Letterkenny, given the principles of compact growth, and the extent of the built up footprint of the town already established, the Assembly agree with the removal of these lands from Primarily Residential Zoning.

DNCC-C42- 7: Letterkenny Chamber of Commerce

Land is fully serviced and one of the only active housing developments within the town.

2.4 Reinstatement of the following zoning objectives and associated text to that of the draft plan:(ii) MA31 PR11 Killyclug – i.e. the subject lands revert to Local Environment from Primarily Residential



Two specific submissions received:

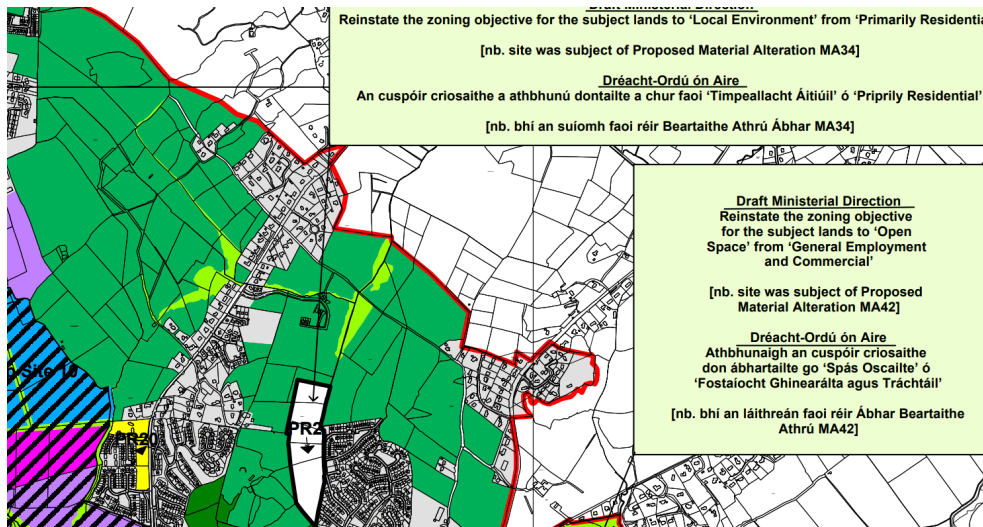
DNCC-C42-8: MH Associates on behalf of Cillanoir Developments Ltd.

- On the basis of the factual information provided, contends that the proposed zoning of 'Local Environment' is inappropriate for this landholding, for reasons relating to the positive planning history, lack of housing provision for MICA affected families, Ukrainian refugees and population increase in the town.
- Permission has previously been granted for an 85 house development.
- All infrastructural and piped services are available adjacent to the landholding and it is located beside a neighbourhood service centre.
- The landowners (Cillanoir Developments Ltd) are currently constructing dwellings (52no.) in Letterkenny for a housing body.
- Houses already built/under construction on adjacent site. (PR15)
- Subject to planning, the site would commence immediately (shovel ready). A Housing Body is in negotiations with the Developer.
- Proposal is considered reasonable and it is requested that the submission is taken into consideration and the lands are zoned as 'Primarily Residential'.
- Part of the site was already zoned as 'Established Development'

DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Opinion: The comments relating to PR 17 are similarly applicable in this case. The Assembly via the RSES has identified this area as a potentially neighbourhood for residential growth, alongside a number of other locations across Letterkenny. This is a part of the overall strategy to grow the Town by 40% by 2040, and provide an additional 3,000 –4,000 houses (RPO 3.7.23) to enable this ambition. There are a number of parcels of land at this location which are Zoned General Employment, and should these lands be developed to provide housing, it is the Assembly's view this would reinforce a neighbourhood which is already established via a number of ancillary services, including a shop, take away outlet, and public house. In conclusion, the Assembly consider Primarily Residential Zoning as appropriate at this location.

2.5 Reinstate the following zoning objectives and associated text to that of the draft plan: MA34 PR2 Castlebane – i.e. the subject lands revert to Local Environment from Primarily Residential



A total of six submissions specifically refer to this item, with all six supporting the Draft Direction.

DNCC-C42-1- Eddie Margey

- Land is zoned local environment and as such should not be developed for residential purposes.
- All planning policy at national, regional, and local level requires town centre out development. There are adequate zoned greenfield and brownfield lands available closer to the centre of town.
- This development would represent further edge-of-centre poor quality suburban sprawl in an area already saturated with such development.
- There are no services to support existing development in this area never mind new development. All journeys for shopping etc must necessarily be car based.
- Further development of this nature in this area will increase the burden already placed on the limited services and infrastructure and increase traffic hazard, the issue of traffic safety on this stretch of road has been raised on numerous occasions with the council.
- This edge of town land should be zoned as is and no more scatter gun bad planning in and around Letterkenny.

DNCC-C42-5: Brendan O Brien

- The current zoning of the land as local environment is in accordance with planning policies at national, regional, and local levels, emphasising town centre development over outlying areas. Rezoning this land for residential use would contradict these policies, especially considering the availability of ample Greenfield and Brownfield lands closer to the town centre.
- The proposed development risks contributing to poor quality suburban sprawl on the outskirts of the town, an area already saturated with such developments. Additionally, the lack of essential services to support existing developments, let alone new ones, raises concerns about the viability and sustainability of residential projects in this location. The absence of nearby amenities would inevitably lead to car-dependent journeys for essential activities like shopping.

- Introducing further residential development in this area would exacerbate the strain on existing services and infrastructure, posing a potential hazard to traffic safety. The ongoing concerns regarding traffic safety have already been raised with the council, underscoring the urgency of addressing these issues before considering additional developments.
- In light of these concerns, the submission strongly advocates for maintaining the current zoning of the edge-of-town land as local environment. This approach aligns with prudent planning principles, ensuring the avoidance of haphazard development and preserving the integrity of the Letterkenny area. Strongly advocates for the proposed rezoning and to prioritise sustainable, centrally located developments that adhere to established planning guidelines.

DNCC-C42- 9 Theresa Reid

- The land is currently zoned 'Local environment' for good reason, proposing residential development is contrary to good planning requirements and adds to urban sprawl in the countryside in the Castlebane and Woodlands areas of Letterkenny – townlands which already suffer from poor planning decisions made in the past.
- There has been far too much residential development in the area, including the building of a number of housing estates in the rural countryside, miles out from Letterkenny Town. Furthermore, the proposed development is not in keeping with existing houses which are detached houses.
- The roads are inadequate, and services are practically non-existent with no public transport, limited street lighting and footpaths etc. Rezoning the area would lead to increased traffic in a rural area which is already a hazard for walkers, cyclists and motorists alike. The council have been made aware of these dangers.
- There are numerous sites closer to Letterkenny which would be more suitable for this type of urban housing development.
- Urges the local councillors to reject the proposal to rezone this land. Local councillors should support the interests of local residents and not those of developers.

DNCC-C42-10: Jean Shug

- States that this not an urban area, it's a country landscape and is currently correctly zoned as Local Environment.
- There is a busy and dangerous road which narrows into a minor country road at Lois Na Greine with absolutely no footpaths or street lighting. Some motorists are speeding above the speed limit of 80k which poses a grave Health and Safety risk.
- Castlebane is far from Letterkenny, there are no shops or play parks in this area necessitating travel by car which is further contributing to our global warming with harmful emissions.
- Donegal County Council should endeavour to ensure that urban type developments are allowed only where services and infrastructure exist to cater for these types of developments, closer to the main town and not in a country area. This development will only add to housing sprawl in unsuitable country areas with no amenities, scant services and poor infrastructure which are totally unsuitable and will lead to many social issues and varying traffic issues going forward.
- Submission highlights these issues with the rezoning of this land at Castlebane from Local Environment to residential would go against all the requirements of good planning.

DNCC-C42-11: Priscella Nascimento

- This is land that is in the countryside, on the outskirts of the town and the land is currently zoned 'Local Environment'. There is ample amount of land that can be developed closer to

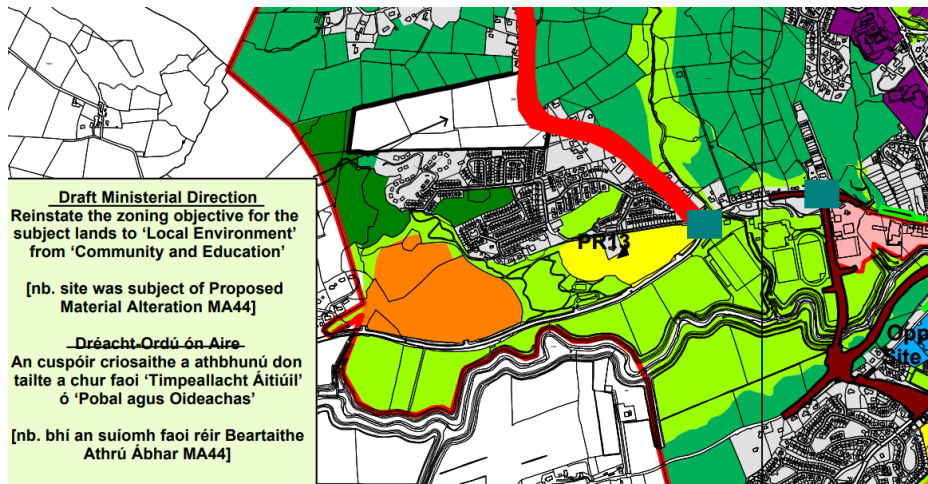
the town centre that would be closer to facilities and be better catered for transport and infrastructure wise.

- Currently Letterkenny is extremely spread out with random developments on roads and in areas that are not fit to service them. Castlebane and Woodlands areas of Letterkenny have very high volumes of one-off housing and a number of estates in the area with little evidence of any town planning in the past. Building in the area has been disjointed with little improvement to any of the infrastructure in the area. There is a poor footpath up the Castlebane Hill, with no cycling lane as well as no playground for children or indeed park for adults to avail of. Rezoning of the land will no doubt lead to significant further future development in the area with no indication of any improved infrastructure for current and future residents in the area.
- The main road is a steep hill has a lot of speeding issues and is difficult to access the existing houses during periods of ice and snow, cars are regularly abandoned on the road during these times. Additional traffic will only add to the safety concerns and possible accidents. There is poor street lighting, with current lighting not going as far as the end of the urban area and with some areas with lighting and other not.
- Housing is already planned for subject lands and the density proposed is at odds with the detached houses in the area. This higher density will change the character of the area and possibly lead to a devaluation of properties in the area.
- Urges the Council and Councillors not to pass the rezoning the land, to think of the current residents in the area, as outlined the lack of facilities and infrastructure in that particular area and try to focus future urbanisation closer to the town centre as per local and national development plans and guidelines.

DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Opinion: The lands in question were not the subject of any comment by the Assembly in its previous submissions. There is a sizeable housing development immediately to the East of the site, however it is the case that proximity to an arterial route as well as proximity to neighbourhood services at this location are remote. It is notable there are 2 significant residential sites to the South, along the main Kilty Road, which are more suitable in terms of access and distance to the Town Centre, and Services. Therefore, the Assembly consider the Draft Ministerial Direction in this regard to be justified.

2.6 Reinstatement of zoning objectives and associated text to that of the draft plan: MA44 Ballymacool – i.e. the subject lands revert to Local Environment from Community and Education



Three specific submissions received:

DNCC-C42-13: Submission from the Department of Education

Refer to their submission on the Proposed Material Alterations in September 2023 in which they advised that that they did not consider the subject lands at Ballymacool appropriate for the provision of a school. The Department thereby requested that DCC consider zoning a more suitable and appropriate area of land for the potential use of future school provision in Letterkenny. Having noted the Draft Direction referring to the land at Ballymacool to revert the zoning on the subject lands from Community and education to Local Environment the Department reaffirms their views in this regard.

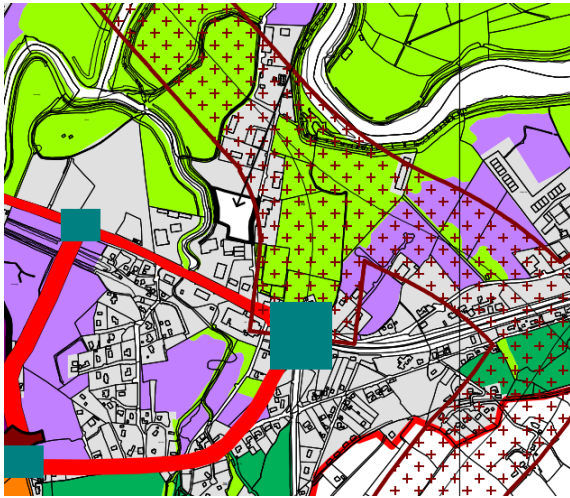
DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Opinion: At the stage of Material Amendments to the LAP and LTP, the Assembly identified the proposed MA 44 (proposed use of lands as an educational campus) as potentially problematic. The Assembly noted in its submission the lands were without adequate access, and given its location, did not contribute to compact growth to the Western edge of Letterkenny. The Assembly also concluded the lands if developed would represent an unnecessary extension beyond the built up footprint of the Town in the Ballymacool / Kirkstown neighbourhood(s). It is the view of the Assembly these concerns remain valid, and the Draft direction to have the lands Zoned as Local Environment is warranted.

DNCC-C42- 7: Letterkenny Chamber of Commerce

Provides opinions on why they consider some of the subject lands in Ballymacool as good examples of edge-of-town housing and thereby the Community and Education zoning would benefit this community.

2.7 Reinststate the following zoning objectives and associated text to that of the draft plan: MA42 Bunnagee – i.e. the subject lands revert to Open Space from General Employment and Commercial



Two specific submissions received:

DNCC-C42-4: MH Associates on behalf of John Crossan & Sons

This submission contains 6 letters from adjoining existing business who support the submission. The letters set out each individual business future development and expansion plans and all of which would hope to remain in their current locations due to the accessibility of the adjoining road network.

A summary of the submission from John Crossan is as follows:

- The positive planning history of the subject lands that permitted the development of commercial/warehousing and light industrial developments.
- Retaining the General Employment zoning would ensure future expansion of the business park and employment growth in this area. This land is ideal for development of this nature providing direct access to national primary routes and avoiding additional traffic in the town.

DNCC-C42-16: Northern and Western Regional Assembly (NWRA)

Opinion: The lands are located on the Eastern bank of the River Swilly, and adjacent to a number of existing employment / commercial uses. The site is currently green field, and whilst it could reasonably be argued the development of the site would represent an infill development (a form of compact growth), it could similarly be argued the location does not represent a sequential approach to employment and commercial development, with a proliferation of such units around the Bunnagee area. Additionally, the lands are identified via the CFRAMS River Flood Extents are Liable to Flooding (Coastal), and it is unclear what mitigation is offered in the justification for the Zoning. It may well be the case this area will require a revised land-use evaluation should the Donegal TEN-T Scheme proceed, with the associated Bonnagee Link likely to significantly alter the setting and access of a number of sites in the vicinity. The Assembly agree the revision of the Zoning at this location to open space is reasoned, particularly in light of the flooding concerns associated with the River Swilly Basin.

2.8 Uisce Éireann and the Letterkenny Chamber of Commerce (General Comments)

DNCC-C42-6: Uisce Éireann

Noted that an area of 147 hectares zoned for housing exceeded the 57ha housing land requirement target set out in Chapter 10 of the Local Area Plan and in a most recent submission at Material Alterations Stage noted that a more focused approach, with fewer zoned sites, would assist in forward planning for future infrastructure needs and support the principle of compact growth. On this basis, the reduction in quantum of residential zoned lands, as outlined in the Draft Direction, is welcomed.

DNCC-C42- 7: Letterkenny Chamber of Commerce

States that they cannot understand the rationale behind the Draft direction from the Minister.

- Chamber have formed a housing committee due to recent concern regarding lack of availability of housing for perspective employees and rise in house prices locally thereby pricing new residents out of the market. Housing has become a major concern to many of the 300 members of Letterkenny Chamber as skills availability, recruitment and retention are the biggest issues flagged in our recent surveys. This issue is affecting all types and sizes of businesses and the 10,000 people employed by members, but most starkly the larger employers who are trying to attract talent from across the world.
- Chamber don't understand why these sites that were deemed suitable for housing in the plan agreed by Council and are within the CSO boundary now have the potential of being removed.
- The Draft Direction is completely contrary to the housing need and ambitions for Letterkenny. The lack of land zoned primarily for housing is limited and this will hamper investment potential. This direction is discouraging housing development at a time when it is most needed and when all parties should be working together to ensure housing targets are met.

3.0 Submissions Considered Outside of Scope of Draft Direction

Three submissions raise issues considered not to be within the scope of the Draft Direction.

DNCC-C42-2: Sasha Johnson	Refers to the lack of planning for mobility-disabled people to get to and move around in the town-centre and other planning areas,
DNCC-C42-12: David Stevenson.	Refers to alleged mapping inaccuracies relating to ATU lands.
DNCC-C42-15: Michael Friel (on behalf of Charles Roarty).	Refers to lands <u>adjacent to</u> a zoning that is the subject of the Draft Direction (site MA34 PR2 Castlebane).

4.0 Summary of Views and Recommendations of Elected Members.

At a special plenary meeting of Donegal County Council on 6th February 2004, the Members in attendance expressed strong opposition to the draft direction. The Members voiced their strong support for the retention of the land uses proposed under the Adopted Plan. A summary of the key reasons, as discussed at the meeting, are set out below:

- 4.1 (a) PR 17 Glencar Scotch and Killyclug – i.e. the subject lands change to un-zoned from Primarily Residential and**
- (b) MA31 PR11 Killyclug – i.e. the subject lands revert to Local Environment from Primarily Residential:**

Members reasoned that the Primarily Residential zoning of these sites should be retained, that they are suitable for residential development and in the context of providing for the Regional growth Centre status of the town and it's function in the county. It was considered that greater regard should be given to the local knowledge of the local representatives in relation to this neighbourhood. The merits of these lands were presented as being adjacent to a local neighbourhood centre providing local amenities, to the availability of existing infrastructure, and to an area where housing development, including local authority housing development, is currently underway. Reference was made to the increase in population in the town in recent times and the need for more housing provision in locations such as these lands.

4.2 MA30(B) PR12 Creeve – i.e. the subject lands revert to Local Environment

Members, while noting the public water infrastructure upgrades required in this area, collectively referred to the suitability of this site for residential development and the retention of the land use zoning as Primarily residential.

4.3 MA34 PR2 Castlebane – i.e. the subject lands revert to Local Environment from Primarily Residential

Members collectively referred to the suitability of this site for residential development and the retention of the residential development zoning. Members specifically cited the availability of existing public services in this area of the town and that they are of the opinion that developers are currently in a position to initiate housing development on these lands.

4.4 MA44 Ballymacool – i.e. the subject lands revert to Local Environment from Community and Education

Members referred to this location and stated that these lands are suitable for community and education provision and in particular childcare facilities given that there is an identified need for these services in the town and due to proximity to residential development, sporting and leisure facilities, and the walkability of the lands to and from the centre of the town.

4.5 MA42 Bunnagee – i.e. the subject lands revert to Open Space from General Employment and Commercial.

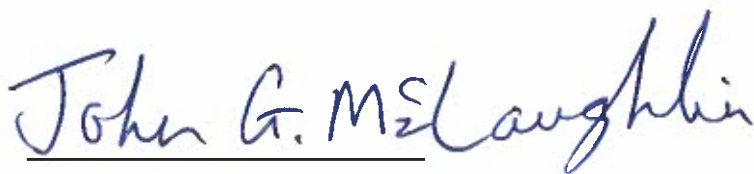
Members voiced concern that the removal of this site from general employment uses restricts existing businesses from further expansion and job creation and concluded that Members would not be in favour of the lands reverting to open space for this reason.

5.0 Opinion of the Chief Executive in relation to the best manner in which to give effect to the draft direction.

Please refer to the undernoted.

Draft Direction Item	Chief Executive's Comment
(a) Delete the following zoning objective from the adopted plan, i.e. the subject land is unzoned: (i) PR 17 Glencar Scotch and Killyclug - i.e. the subject lands change to unzoned from Primarily Residential.	It is respectfully submitted that the Minister may wish to reconsider this proposal in light of the submissions received from the NWRA; the Letterkenny Chamber of Commerce and the private individual.
(b) Reinstate the following zoning objectives and associated text to that of the draft plan: (i) MA30(B) PR12 Creeve - i.e. the subject lands revert to Local Environment	It is respectfully submitted that the Minister may wish to reconsider this proposal in light of the submissions received from the Letterkenny Chamber of Commerce and the private individual.
(b) Reinstate the following zoning objectives and associated text to that of the draft plan: (ii) MA31 PR11 Killyclug - i.e. the subject lands revert to Local Environment from Primarily Residential	It is respectfully submitted that the Minister may wish to reconsider this proposal in light of the submissions received from the NWRA; the Letterkenny Chamber of Commerce and the private individual.
(b) Reinstate the following zoning objectives and associated text to that of the draft plan:	It is considered that the most appropriate course of action is to implement/uphold the Draft Direction, noting that those submissions

Draft Direction Item	Chief Executive's Comment
(iii) MA34 PR2 Castlebane - i.e. the subject lands revert to Local Environment from Primarily Residential	received all express strong planning reasons for doing so.
(b) Reinstate the following zoning objectives and associated text to that of the draft plan: (iv) MA44 Ballymacool - i.e. the subject lands revert to Local Environment from Community and Education	It is considered that the most appropriate course of action is to implement/uphold the Draft Direction, noting the comments of the Department of Education and NWRA and notwithstanding the comments of the Letterkenny Chamber.
(b) Reinstate the following zoning objectives and associated text to that of the draft plan: (v) MA42 Bunnagee - i.e. the subject lands revert to Open Space from General Employment and Commercial	It is considered that the most appropriate course of action is to implement/uphold the Draft Direction, noting the comments of the NWRA and notwithstanding the comments of the private individual.



**John G McLaughlin,
Chief Executive,
Donegal County Council.**

Dated: 20th February 2024

Appendix A: Draft Ministerial Direction.

The Minister of State for Local Government and Planning issued a 'Notice of Intention to Issue a Direction' to the Planning Authority under Section 31 of the Planning and Development Act, 2000 (As Amended) ('the Act'). The Draft Direction concerns the zoning of six parcels of land in the town. These matters, in accordance with Section 31(6) of the Act, 'shall not have effect', notwithstanding their inclusion in the Plan as adopted by the Council and pending the issuing of the Minister's Final Direction.

The Draft direction sets out the following:

- (a) Delete the following zoning objective from the adopted plan, i.e. the subject land is un-zoned:
 - (i) PR 17 Glencar Scotch and Killyclug - i.e. the subject lands change to unzoned from Primarily Residential.
- (b) Reinstate the following zoning objectives and associated text to that of the draft plan:
 - (i) MA30(B) PR12 Creeve - i.e. the subject lands revert to Local Environment
 - (ii) MA31 PR11 Killyclug - i.e. the subject lands revert to Local Environment from Primarily Residential
 - (iii) MA34 PR2 Castlebane - i.e. the subject lands revert to Local Environment from Primarily Residential
 - (iv) MA44 Ballymacool - i.e. the subject lands revert to Local Environment from Community and Education
 - (v) MA42 Bunnagee - i.e. the subject lands revert to Open Space from General Employment and Commercial

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

Appendix B

Names of those who made submissions:

Ref	Name
1	Eddie Margey
2	Sasha Johnson
3	Kenny Burke on behalf of Sean Gallagher
4	MH Associates on behalf of John Crossan
5	Brendan O Brien
6	Uisce Eireann
7	Letterkenny Chamber of Commerce
8	MH Associates on behalf of Cillanoir Developments Ltd.
9	Theresa Reid
10	Jean Shug
11	Priscella Nascimento
12	David Stevenson
13	Department of Education
14	Harley Planning Consultants on behalf of GDC (Ird).
15	Michael Friel on behalf of their client Charles Roarty.
16	Northern and Western Regional Assembly, (NWRA).