

Letterkenny Plan and Local Transport Plan 2023-2029



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

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PART A – Land Use Planning Policies

Chapter 1 – Introduction and Context

1.1 Statutory Context

The Letterkenny Plan and Local Transport Plan 2023 – 2029 (hereinafter referred to as 'the Plan') has been prepared in accordance with the requirements of Sections 18-20 of the Planning and Development Act, 2000 (as amended) (the Act). The Plan sets out an overall strategy for the proper planning and sustainable development of Letterkenny in the context of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly area (the RSES) and the Donegal County Development Plan 2018-2024 (As Varied) (the CDP). The Plan has been drafted having regard to Ministerial Guidelines issued pursuant to Section 28 of the Act, and in accordance with EU requirements regarding Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). Arising from these obligations, the Plan is accompanied by supporting documents including a Natura Impact Report (in respect of Appropriate Assessment); an Environmental Report (in respect of Strategic Environmental Assessment); a Strategic Flood Risk Assessment; and an Infrastructural Assessment.

The Letterkenny Plan 2023-2029 replaces Chapter 12, Part C of the CDP, which heretofore contained the detailed planning policy framework for the town of Letterkenny. It is intended that the said section of the CDP will be deleted by way of a Variation to the CDP, which Variation shall be made by Donegal County Council at the same time as the adoption of the new Letterkenny Plan.

Section 19(1)(c) of the Act provides that a Local Area Plan must be reviewed no later than six years after its adoption. The required review will be carried out in compliance with this provision but it should be noted that this Plan has been prepared with a ten-year horizon in mind in order to align with the period covered by the 'Transitional Regional and County Population Projections to 2031' contained in the 'Implementation Roadmap for the National Planning Framework' (Department of Housing, Planning and Local Government, July, 2018).

The Plan is comprised of two parts. Part A contains the plans and policies of a 'conventional' land use plan, whilst a Local Transport Plan is contained in Part B. Together, these two parts constitute the Written Statement of the Plan. The Plan also contains a Zoning Map and other maps. The Written Statement shall take precedence over the Zoning Map and other maps should any discrepancy arise between them.

The Letterkenny Plan must be read in tandem with the CDP, as general policies and standards contained with the CDP are also applicable within the Letterkenny Plan area. All proposals for development that are put forward in accordance with the provisions of this LAP must also comply with relevant objectives and policies of the CDP.

1.2 Public Consultation

The strategic vision for the future development of Letterkenny has been informed by an extensive public consultation exercise, which was undertaken throughout May and June of 2018 and which augmented Donegal County Council's research and analysis as to the main issues affecting the

residents and stakeholders in Letterkenny. The consultation process included a wide range of events in order to enable engagement with the public and with stakeholders and interest groups across varying sectors. The consultation events undertaken by the Planning Authority included:

- 2 workshops with the business community.
- A workshop with the community, social and cultural sector.
- A business gathering facilitated through the Local Enterprise Office (LEO).
- Local consultation meeting with a group of Main Street businesses.
- Local consultation meeting with LYIT Executive Board.
- Local consultation meeting with a grouping of larger employers.
- Local consultation meeting with the Cathedral Quarter Initiative.
- Urban Design project in respect of Letterkenny town centre; prepared by students from Queens University of Belfast, MSc Planning.
- Inviting individual submissions by email or post.
- Promotion of an online questionnaire about the town centre, which in itself resulted in over 500 responses.
- Promotion of an online survey in relation to the Local Transport Plan, again attracting in excess of 500 responses.

The findings from the overall consultation exercise were compiled into a final report and it was noted that there were nine distinct strategic themes that should be used to inform the drafting of the Letterkenny Plan; these themes are set out in Figure 1.1 below.



Fig 1.1 Themes that Emerged from Consultation

The Letterkenny Plan seeks to build on the nine themes identified above and sets out a strategic vision for the town over the period to 2029 and beyond. The policies, objectives and strategies presented herein, like the themes above, are interdependent and will be applied synergistically to guide the development of the town in a cohesive manner.

1.3 Environmental Mitigation and Management

The Plan has incorporated significant environmental mitigation measures in the form of zoning considerations and proactive objectives and policies. These reflect the consideration given to potential environmental impacts throughout the iterative process of plan development, which has guided the formulation and environmental assessment of all policies and objectives. It should also be noted that objectives and policies set out in the CDP, and further contextualised in the Environmental Report and the Natura Impact Report of the CDP, also apply to this Plan. Some 27 of the objectives and policies set out in the CDP specifically include compliance with Article 6 of the Habitats Directive as a condition of implementation. A further 10 objectives or policies impose a constraint of no impact on Natura 2000 sites. In addition to this, wider environmental constraints are referenced throughout many of the objectives and policies of the CDP.

In addition to the specific objectives and policies listed in the Local Area Plan (LAP) and CDP, many others promote environmentally beneficial measures such as retention of natural vegetation, hedgerows and woodland and best practice in flood risk abatement, or consideration of statutory environmental management plans (e.g. River Basin Management Plans and Programmes of Measures, Freshwater Pearl Mussel Sub-Basin Plans, Shellfish Pollution Reduction Programmes, EU Biodiversity Strategy). Together they create an ethos of environmental awareness and appreciation that pervades the CDP and LAP and will contribute significantly to maintaining the conservation status and integrity of the Natura network.

1.4 Climate Change Mitigation and Adaptation

Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. The effects of climate change are already discernible in Ireland and projected impacts include higher intensity rainfall events, more intense storms and storm surges, sea level rise, warmer temperatures and longer periods of low rainfall. In recognition of the need to plan for the effects of climate change, a specific chapter is included herein, detailing how climate change mitigation and adaptation measures will be considered in implementing the Letterkenny Plan.

1.5 Letterkenny Within the Hierarchy of Spatial Planning Policy and the Settlement Structure of the County Development Plan 2018-2024

The Letterkenny Plan sits within a distinct hierarchy of planning policy documents, covering the entire scope of planning policy from a national to a local level. Figure 1.2 below details the policy hierarchy and the position of the Plan in this hierarchy.

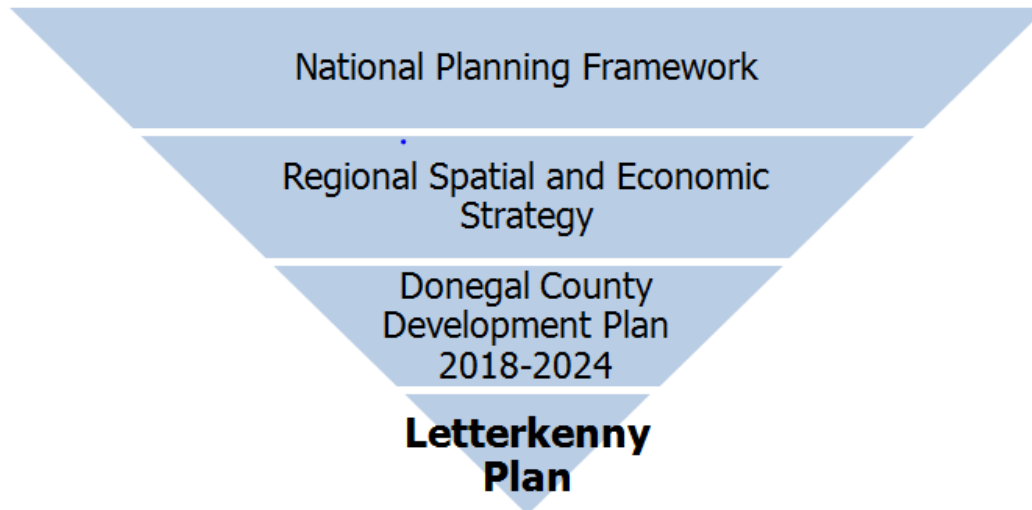


Fig 1.2 The Letterkenny Plan within the Planning Policy Hierarchy

The above-noted planning policy hierarchy earmarks significant growth for Letterkenny and this theme is developed in the Chapters that follow.

1.6 Letterkenny as a Regional Growth Centre

The NWRA's Regional Spatial and Economic Strategy recognises the key role of Letterkenny as part of a 'North-West City Region'; a cross-border network of urban centres focussed on Letterkenny, Derry and Strabane but also encompassing a wider metropolitan area containing many significant settlements. The RSES defines a boundary for the Letterkenny Regional Growth Centre, which is informed by geographical features, environmental considerations and by identifying the main population and employment locations of the settlement that define the Principle Urban Area, together with those areas on the periphery that display high commuting patterns towards Letterkenny. The boundary for the Letterkenny Regional Growth Centre Strategic Plan (RGCSPP) is detailed in Figure 1.3 below. It should be noted that the area covered by the RGCSPP boundary (as set out in the RSES) is more extensive than the area covered by the Letterkenny Plan boundary and that from a planning policy perspective, areas outside of the Letterkenny Plan boundary will be covered by the policy framework contained in the operative County Development Plan.

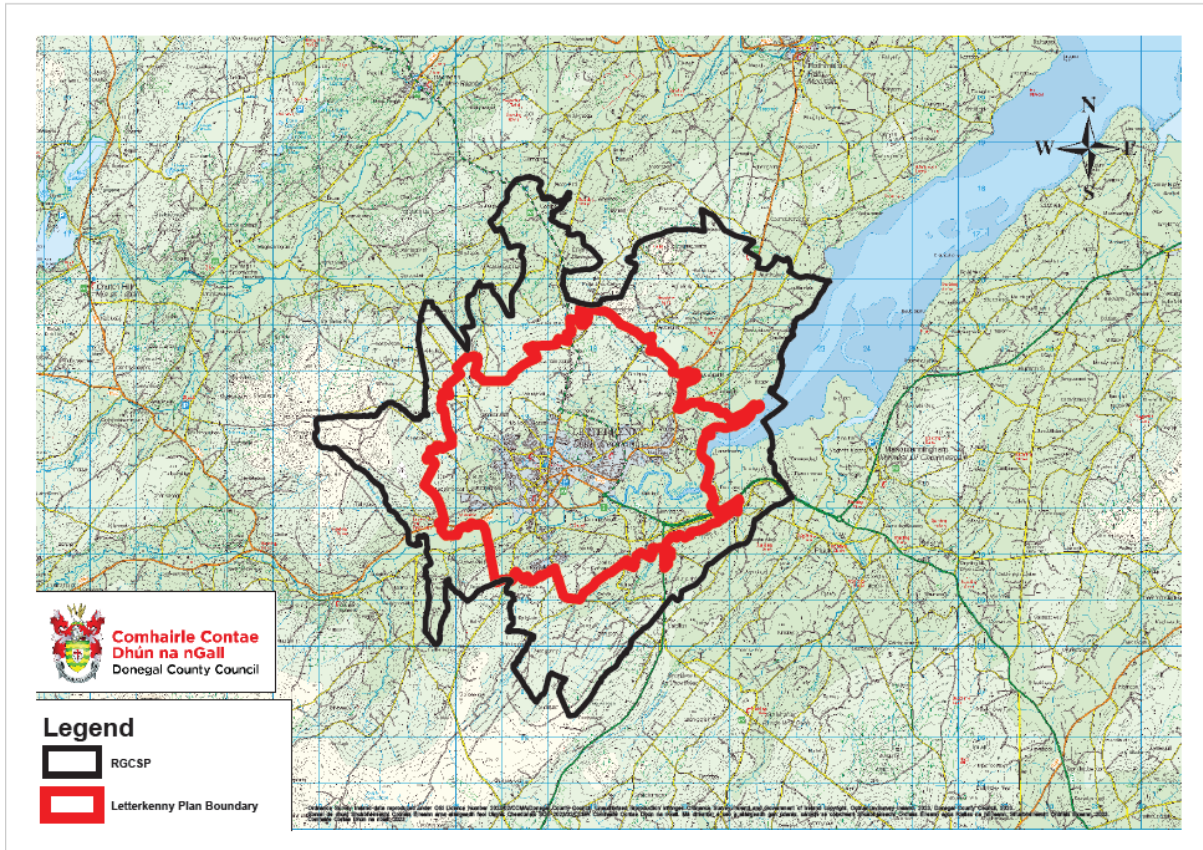


Fig 1.3 Letterkenny Regional Growth Centre Strategic Plan boundary (source: NWRA RSES)

Chapter 2 - Strategic Context and Growth Ambitions



STRATEGIC CONTEXT AND GROWTH AMBITIONS

INTRODUCTION

Letterkenny is the key economic engine of the Donegal economy, and a strategic regional centre for the North-West. Inclusive of its broader function as a key component of the cross-border North-West City Region (the fourth largest urban agglomeration on the island of Ireland) along with Derry City, Strabane and their intervening hinterlands. Whilst Letterkenny had a recorded population of 19,274 persons in Census 2016, this figure is a significant under-representation of the real vibrancy and already-established critical mass of the town as it excludes a major cohort of business and recreational daytime 'visitors' to the town including those visiting out of necessity for employment, education (both full-time and part-time students) and healthcare reasons, as well as numerous other visits to the town for reasons of personal choice including for shopping and leisure purposes. It has been conservatively estimated that the day-time population of the town is closer to double the officially identified resident population levels.

The economic and strategic regional importance of Letterkenny is fully recognised and supported in the prevailing statutory planning policy framework comprised of the National Planning Framework (NPF), the Northern and Western Regional Assembly's Regional Spatial and Economic Strategy (RSES), and the County Donegal Development Plan, 2018-2024 (CDP 2018-2024). Collectively, this policy framework provides strong support for the pursuit of an ambitious growth agenda for the town. In order to properly plan for the town, it is important firstly to understand why, and how, these strategic growth ambitions for Letterkenny have been identified at the national and regional level.

NATIONAL PLANNING FRAMEWORK



REGIONAL PARITY

National policy seeks to manage national growth so that it is more evenly distributed across the three administrative regions identified in the NPF. The twin objectives of this approach are to reduce unsustainable pressures on the Eastern and Midland Regional Assembly area (particularly the Greater Dublin area), whilst at the same time creating a more favourable environment for the two other regional assembly areas (Northern and Western, and Southern) to prosper. Thus 'regional parity' is a specified objective in the NPF whereby the targeted growth of the Northern and Western and Southern Regional Assembly areas combined would at least equate to that projected for the Eastern and Midland Region (NPF para. 2.4 and National Policy Objective 1a refer).

STRONGER URBAN PLACES / LETTERKENNY REGIONAL CENTRE

Both the NPF and the RSES assert that a key policy instrument for delivering the regional parity objective must be the development of strong urban centres (eg. refer Chapter 4 of the NPF - 'Making Stronger Urban Places' and Section 3.4 of the RSES - 'Urban Places of Regional Scale'). Both documents identify weaknesses in the urban structure of the NWRA area relative to the other two regional areas. Notwithstanding, Letterkenny is designated as one of only five 'Regional Centres' throughout the country (the others being Sligo, Athlone, Dundalk and Drogheda).



NORTHWEST CITY REGION

Letterkenny is also identified as part of the linked metropolitan heartbeat of the broader North-West City Region (along with Derry City and Strabane in N. Ireland). Section 8.3 of the NPF states that: 'The development of the North-West City Region, focused on Derry City, Letterkenny and Strabane ... is essential to achieving the potential of the North-West and to maximizing its contribution to regional and all Island economic growth'. This is supported, inter alia, in NPF NPO Objective 45 and RSES RPO 9.1. The population of the City Region and its functional territory is estimated as being of the order of 350,000 people.



LETTERKENNY STRATEGIC GROWTH AMBITIONS

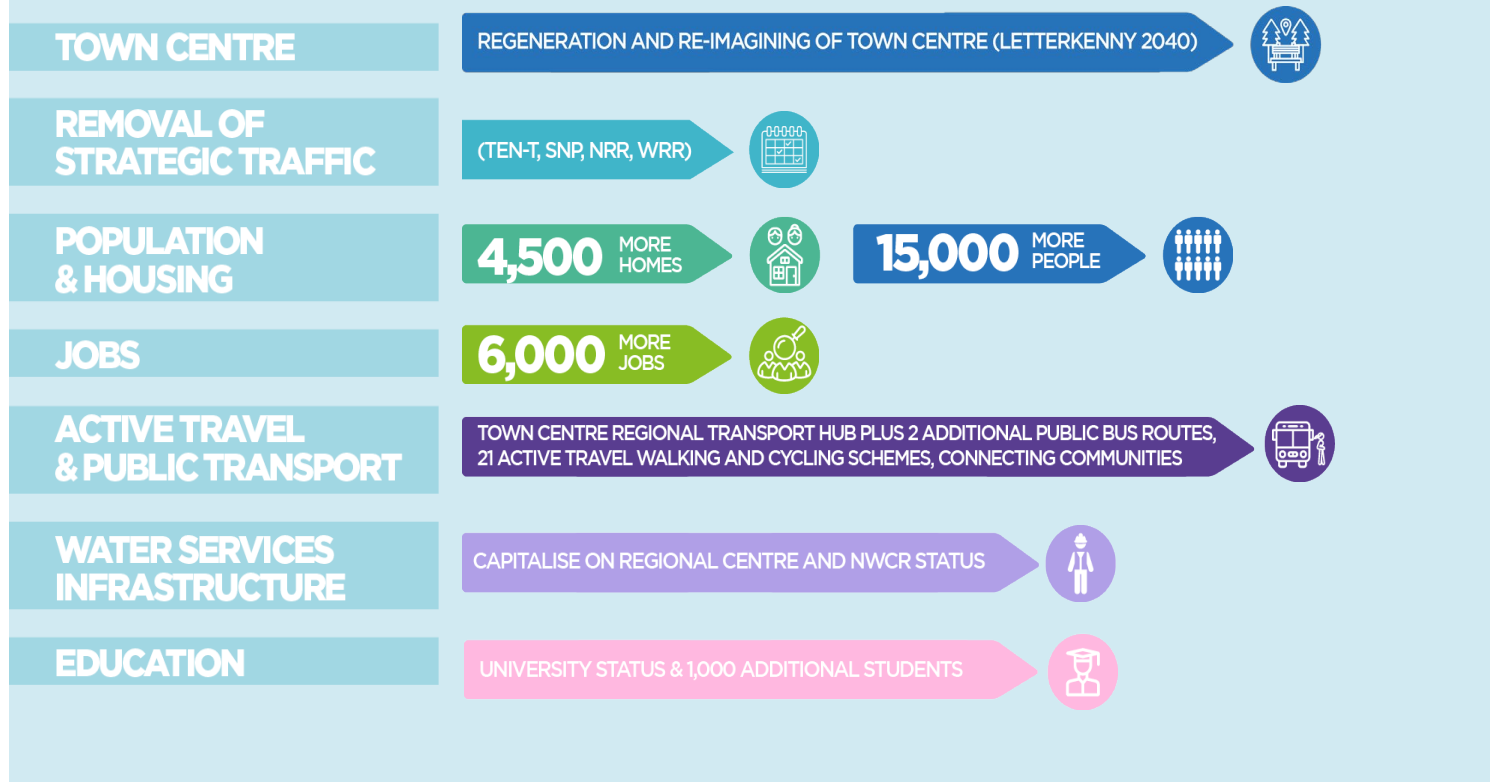
In simplistic, two-dimensional terms, the strategic growth ambitions addressed in this Letterkenny Plan include:

- Increasing the population to a small city-scale of at least 35,000 people towards 2040;
- Providing an additional 5,000-6,000 jobs over the same period;
- Support for the expansion and development of the Atlantic Technological University (Letterkenny Campus).

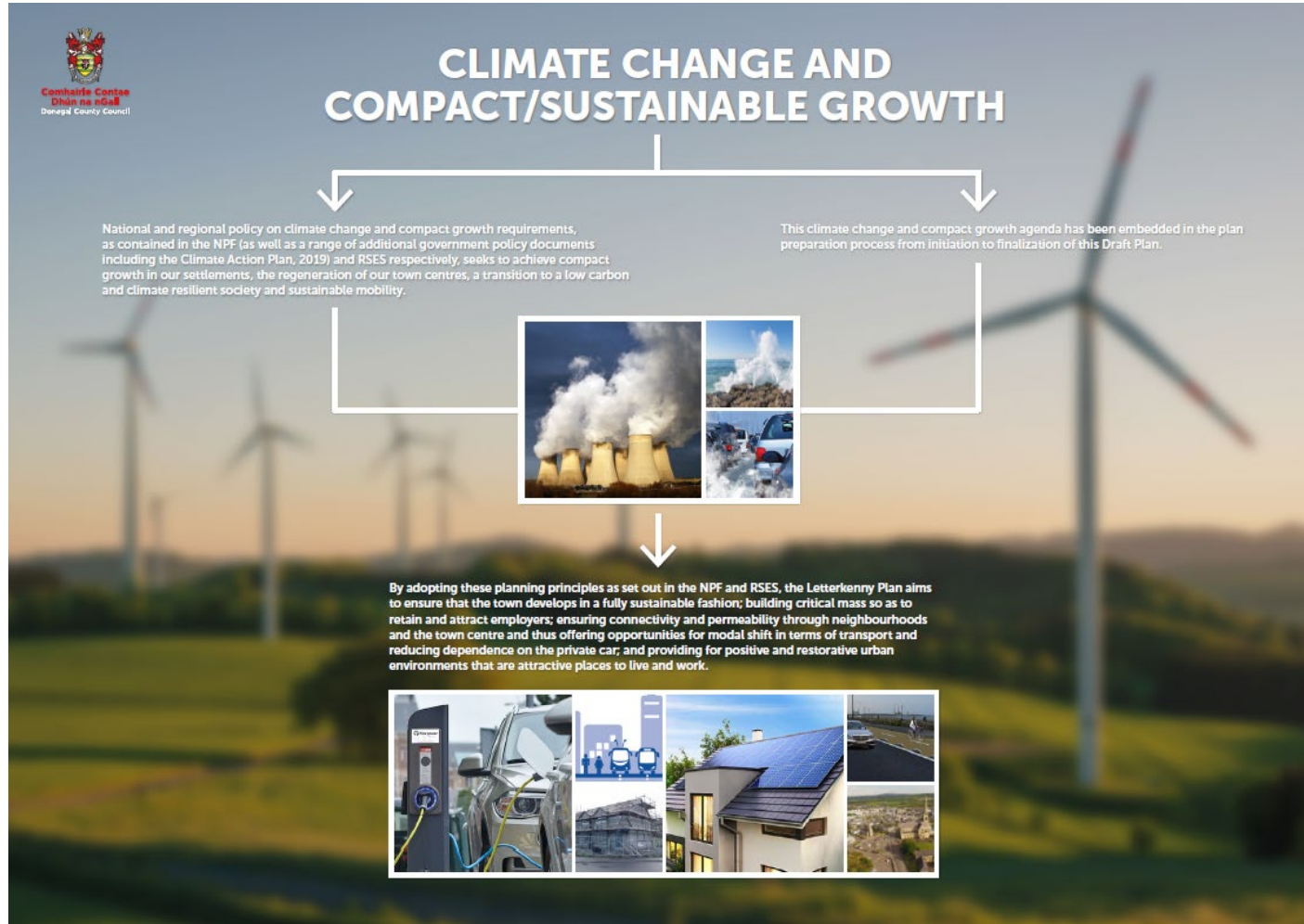


These growth ambitions must be complemented by a parallel drive to make Letterkenny a quality place in which to live, work, visit and do business by building on the existing assets of the town and addressing deficiencies where they exist.

LETTERKENNY PLAN AND LOCAL TRANSPORT PLAN 2022-2031 AMBITIONS



Chapter 3 - Climate Change and Compact/Sustainable Growth



Chapter 4 – Key Structural Issues

The following inter-linked issues have been identified as the key issues that must be recognised and placed at the centre of the new strategy for the growth of the town.

4.1 Strategic Transportation Issues & Sustainable Transportation Ambitions

The urban fabric and functioning of Letterkenny is heavily influenced by the dominance of the motorised vehicle and the infrastructure that perpetuates this dominance, at the expense of other more sustainable modes of transport. This prevailing situation has evolved over time due to, inter alia: a longstanding cultural preference for the car; the priority given to roads-based infrastructure and associated investment; a development pattern that encourages use of the car; and the lack of investment in sustainable modes of transport to provide genuine alternatives. Collectively, the transportation approach is having an ongoing major detrimental impact on the social and economic functioning, and environmental condition, of the town.

This dominance of the motorised vehicle is arguably the most important issue to be addressed in the Letterkenny Plan and Local Transport Plan. There is a critical need to set out a coherent and balanced roadmap that will, over time, transform the town to one that offers meaningful sustainable alternatives to the car, whilst at the same time ensuring that the legacy road network deficiencies are addressed as a key element of the overall approach.

4.2 Development Patterns: Experiences to Date and the Need for Consolidation

Broadly speaking, Letterkenny has to a large extent developed in a non-sequential manner over the past 25 years. In many cases, the developed residential areas are significantly removed from the town centre and other attractors such as large employers and public parks and amenities. The impacts of the intervening respective distances, particularly between residential areas and the town centre, are often made worse by the topography of the town, which is not immediately conducive to walking/cycling, particularly when the obvious routes are served by inadequate facilities.

Life in Letterkenny was once primarily focussed around the Main Street and immediately adjoining areas. However, rising economic fortunes, particularly during the economic boom period of the mid-1990s to the late 2000s, precipitated a significant increase in the demand for housing land in the town and hence residential developments were provided for at numerous locations throughout the considerable 2,671 hectare Development Plan area. During the economic downturn that followed, there was a recognition that not all of the land zoned for residential purposes would in fact be required to facilitate the growth of Letterkenny in the medium term, and thus the Letterkenny and Environs Development Plan 2009-2015 was varied in 2013, resulting in the rezoning of considerable areas of somewhat peripheral land from 'Primarily Residential' to 'Strategic Residential Reserve'.¹ There was also recognition of the discordant development patterns that had emerged in Letterkenny, namely:

- An extensive area of 'new' town centre along the Paddy Harte Loop Road, providing for large floor space requirements - this area continues to be disconnected from the traditional Main Street shopping area;

¹ Refer to Variation of the Letterkenny & Environs Development Plan 2009-2015 which, inter alia, introduced an evidence-based Core Strategy into the Plan, as required by the Planning and Development (Amendment) Act 2010.

- Residential development occurring in a dispersed manner along the radial routes servicing the town; and
- Blocks of undeveloped land between the radial routes into the town.

This pattern of development is still evident today and gives rise to numerous issues including poor connectivity between neighbourhoods and the town centre, a reliance on the private car to move through the town, difficulties in terms of facilitating an effective public transport system and encouraging a transition to more sustainable forms of transport generally.

The above-referenced issues are not limited to Letterkenny as a settlement, but rather are typical of many towns throughout Ireland. In order to address the oftentimes fragmented nature of settlements therefore, the National Planning Framework (NPF) places a new emphasis on 'Compact Growth' (as referenced earlier in this Plan) and indeed cites this ambition as the first 'National Strategic Outcome' that the NPF seeks to deliver. Regional planning policy, as expressed through the Regional Spatial and Economic Strategy (RSES), rehearses this theme and advocates the delivery of a mix of residential accommodation in the town centre as well as the sequential, phased delivery of residential lands in suburban areas. A key opportunity in this regard is the significant area of undeveloped land located immediately to the south of the town centre and River Swilly, at Leck and Scribly. These lands are unserviced at present and the unlocking of these lands presents a key challenge for the Plan and all relevant stakeholders.

4.3 Infrastructural Deficits, Consequences and Challenges

4.3.1 Transportation

Section 4.1 above, entitled 'Strategic Transportation Issues & Sustainable Transportation Ambitions', has already outlined the issue of the dominance of the motorised vehicle, and the already-existing and ongoing impact this has on the functioning and urban fabric of Letterkenny. Section 4.1 also states that there is a critical need to set out a coherent and balanced roadmap that will, over time, transform the town to one that offers meaningful sustainable alternatives to the car, whilst at the same time ensuring that the legacy road network deficiencies are addressed as a key element of the overall approach. The longer-term, ambitious compact growth agenda and resolution of the strategic issues facing the town as identified in the preceding sections will only be achieved if supported by the delivery of a balanced suite of transportation interventions. The statutory processes for these projects are at different stages, and security of funding also varies from secured to unknown. Notwithstanding these uncertainties, this Plan sets out a rational policy framework to drive the desired transportation interventions.

4.3.2 Wastewater Infrastructure

Wastewater Treatment Capacity

There is sufficient wastewater treatment capacity in the short-to-medium term following significant recent investments made by Irish Water in the wastewater treatment plant at Magherenan. Additional capacity will be required in the medium-to-longer term however, to serve the growth ambitions for the town.

Wastewater Network

[North of the river]: recent improvements have provided adequate capacity in the short-to medium term for those areas already served by the network, subject to further extensions required to service specific developments. However, in the medium-to-longer term, a review of the existing network capacity is required.

[South of River/Port Road/Bonagee Area]: These large and strategically important parts of Letterkenny generally are not served by sewerage infrastructure, thereby placing obvious limitations on the potential at these locations. Significant investment is required to address these constraints.

Irish Water has prepared a 'Network Development Plan' (NDP) for Letterkenny. The NDP provides high level, indicative suggestions as to how the town in its entirety might be served from a wastewater network perspective; however, the details contained in the NDP do not constitute a commitment to funding the necessary works and at present Irish Water has no funding capacity to progress wastewater network solutions for the unserved areas of Letterkenny.

4.3.3 Water infrastructure

Drinking Water Capacity

Several significant water supply projects have been undertaken in recent years to increase and secure the water supply to Letterkenny. These include trunk watermain upgrades, a new Water Treatment Plant (WTP) at Goldrum and a new interconnector from Illies WTP to Letterkenny. Donegal County Council estimates that these works provide for capacity in the short-term and that further improvements will be needed to increase the provision of the required volumes of drinking water in the short-to-medium term.

In addition, further significant interventions will be required in the medium-to long term. These required interventions are to be identified through the full 'options assessment stage' of Irish Water's National Water Resources Plan, currently being progressed.

Drinking Water Distribution Network

[North of the river]: Recent improvements provide sufficient distribution and security of supply in the short-to-medium term.

[South of River/Port Road/Bonagee Area]: The area is currently served by a weak network unable to cater for significant development.

Thus, similar to the wastewater network situation, targeted interventions are required in relation to the water distribution network if the growth ambitions for the town are to be fulfilled. These required interventions to the drinking water distribution network will need to be determined as part of a drinking water distribution network development plan.

The ongoing work of Irish Water in relation to the National Water Resources Plan and the (Letterkenny) wastewater Network Development Plan is welcomed. However, it is evident that efforts need to be maintained to ensure that the Regional Centre of Letterkenny is not constrained in its future growth as a result of servicing issues. This Plan therefore clearly articulates the growth ambitions for Letterkenny and highlights those areas where investment in water services infrastructure will be crucial going forward.

4.3.4 Flood Defence Infrastructure

The town of Letterkenny, and particularly the town centre, has developed historically in a low-lying area adjoining the channel and estuary of the River Swilly. Consequently, parts of the town are at risk from fluvial (river) and coastal flooding, and indeed from a combination of both. The extent of the potential flood risk is highlighted in the Strategic Flood Risk Assessment (SFRA) that accompanies the Letterkenny Plan.

The function of the Letterkenny Plan as regards flood risk is to manage development to ensure that Letterkenny can continue to thrive without placing development and residents at undue risk from flooding. The regeneration and ongoing sustainable development of the town centre in particular, is critical to the future success of Letterkenny and indeed the wider region, given the town's role as a designated Regional Centre and its function as the economic engine of County Donegal. The existing situation therefore, whereby a significant portion of the central area remains prone to flood risk, is far from ideal and has significant implications in terms of the consolidation of the central area of Letterkenny and the compact growth of the settlement.

The OPW's CFRAM study has identified that existing development in the town centre could be defended from flood risk using hard defences and a pilot delivery model for the delivery of flood defences in Letterkenny was announced in May 2023, which will transfer the management of data gathering, as a first step in designing a scheme, from consultant engineers to the Council.. Whilst this announcement is certainly welcomed, the design and construction of flood defence infrastructure will take several years and the Council will therefore continue to engage fully with the OPW and other relevant statutory agencies to progress the delivery of all required flood defence infrastructure for Letterkenny.

Detailed policies in relation to flood risk management in the town centre area are set out in Section 9.4.1 For all areas outside of the defined town centre, the planning authority will utilise the policy framework set out under Section 12.3 in addition to the flood risk management policies set out in the operative County Development Plan, which will ensure compliance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities.

4.3.5 Town Centre

Notwithstanding that Letterkenny town centre functions as a regionally-important centre offering a wide range of services and facilities, the centre presents many interdependent urban and place-based challenges that are long-standing, and arise as a result of a combination of factors, including:

- a. an urban design and transport planning legacy approach that favours the car over other modes of transport;
- b. inadequate active travel and public transport connections between the various sub-areas of the centre;
- c. under-utilisation of central real estate due to low-density, poor quality developments thereon;
- d. under-provision of public realm and parks; and
- e. unsatisfactory levels of vacancy and dereliction.

In addition, even in advance of the COVID pandemic, other external challenges were also evident including currency fluctuations, uncertainty over Brexit and a changing environment towards online retail and service trade. Chapter 9 of this Plan, 'Town Centre Strategy', sets out the Councils approach for town centre development going forward, with a focus on addressing the aforementioned challenges through the provision of quality development and application of placemaking principles.

4.3.6 Letterkenny 2040 Regeneration Strategy

Donegal County Council has already recognized the problems set out above. Since 2018, the Council has been progressing an urban regeneration programme comprising a number of measures designed to progress the strong interventions required to transform the town centre under the umbrella of the Letterkenny 2040 Regeneration Project. Chapter 9: 'Town Centre Strategy' addresses the town centre in detail.

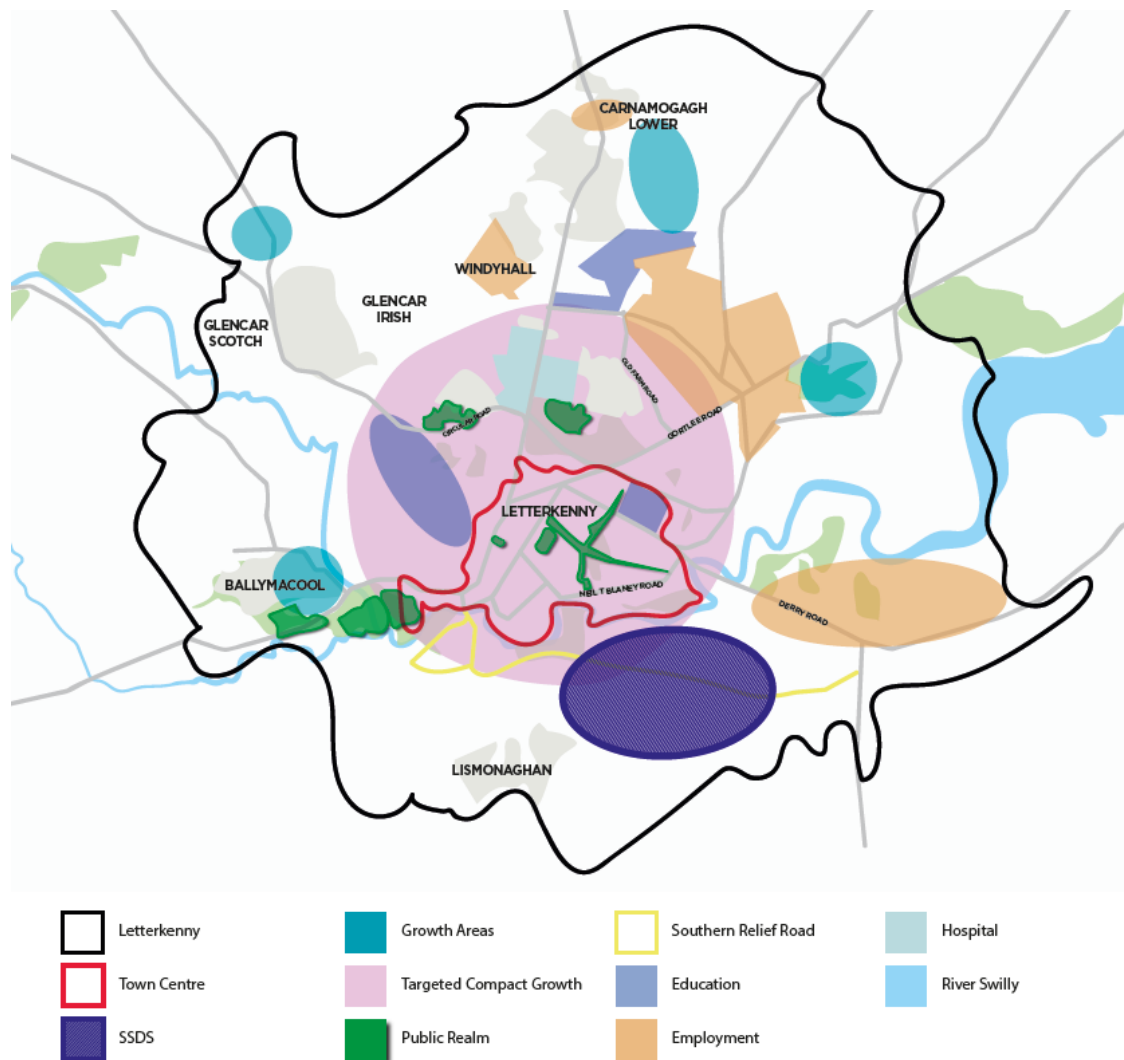
Chapter 5 – Development Strategy and Consolidation

The preceding sections set out the broad policy context in terms of the growth ambitions, compact and sequential growth agenda, and key structural issues within which the Plan must be formulated. This Section sets out how these key national policy messages and underlying local considerations have been applied to the existing built form in Letterkenny in order to arrive at a strategic-level plan that, it is hoped, will facilitate and drive the appropriate growth of the Regional Centre in the short-to-medium term. It is intended that the Plan will also serve as a keynote reference document and roadmap, in accordance with the Plan-Led approach stipulated in national policy, for the various significant strategic infrastructure interventions that will be needed to enable the town to grow in accordance with its Regional Centre status and associated ambitions.

5.1 Compact Letterkenny

Figure 5.1 below identifies the location of the key spatial components of the central business district of Letterkenny. Principal amongst these are: the town centre, inclusive of the Atlantic Technological University (Letterkenny campus); the IDA Business Park and employment areas; the Letterkenny University Hospital (LUH) campus and adjacent Bernard McGlinchey Town Park; and the concentration of schools on the Convent Road and the adjacent Cathedral area. The fringes of this core area are loosely defined by the existing road network comprised of: the Business Park Road/N56 to the north; Ramelton Road/N56 to the east; Neil T. Blaney Road to the south; and Convent Road/Glencar Road to the west.

Figure 5.1 – Key Spatial Components of Development Strategy



It is evident that there is significant remaining development capacity within and on the fringes of the core area as defined above, and that there is a significant opportunity to re-balance the footprint of the town by facilitating development immediately to the south of the river in the Leck/Scribly area. The greatest majority of the housing and economic development requirements for the town can be accommodated within the broad core area thus maximising the use of existing and proposed infrastructure, enabling connectivity and permeability between neighbourhoods and simplifying the delivery of much needed improved public transport. Chapter 10: 'Housing' and Chapter 8: 'Economic Development and Employment' provide more details on relevant targets and how this broad Development Strategy has informed the identification of development opportunities.

Section 4.3.6: 'Letterkenny 2040 Regeneration Strategy' and Chapter 9: 'Town Centre Strategy', address the comprehensive regeneration strategy being progressed by Donegal County Council and stakeholders for the town centre. Implementation of the strategy will be transformative for the town centre and should also act as a catalyst for further compact growth in the wider core area as identified above.

A limited number of other development opportunities are identified outside of the core area. Chapter 10: 'Housing', also sets out the rationale behind these particular zonings, including proximity to neighbourhood services and a strategic opportunity presented by adjacent existing and future IDA and ATU campuses.

Regional Policy Objectives RPO 3.2(b) and 3.7.22 as contained in the Northern and Western Regional Assembly Regional and Spatial Economic Strategy, 2020-2032 set out targets of relevance to the Development Strategy:

RPO 3.2(b): Deliver at least 40% of all new housing targeted in the Regional Growth Centres within the existing built-up footprints.

RPO 3.7.22: To ensure that at least 40% of all newly developed lands (residential, enterprises and employment) are within the existing built-up urban areas of Letterkenny.

Implementation of this Development Strategy would see both targets being significantly exceeded.

Chapter 6 – Strategic Infrastructural Deficits

Section 4.3 'Infrastructural Deficits, Consequences and Challenges', has already identified the key infrastructural deficits facing the town. Although development can be accommodated in the short-to-medium term, subject to further upgrades in terms of treated water capacity, it is clear that the nationally and regionally-supported ambition of growing Letterkenny to a Regional Centre of scale will not be realised if the infrastructural deficits and challenges remain unresolved.

Fig 6.1 below captures the key elements of these deficits in graphic form. A detailed schedule of the elements is contained in Table 6.1 below, together with a comment in relation to how these matters should be progressed.

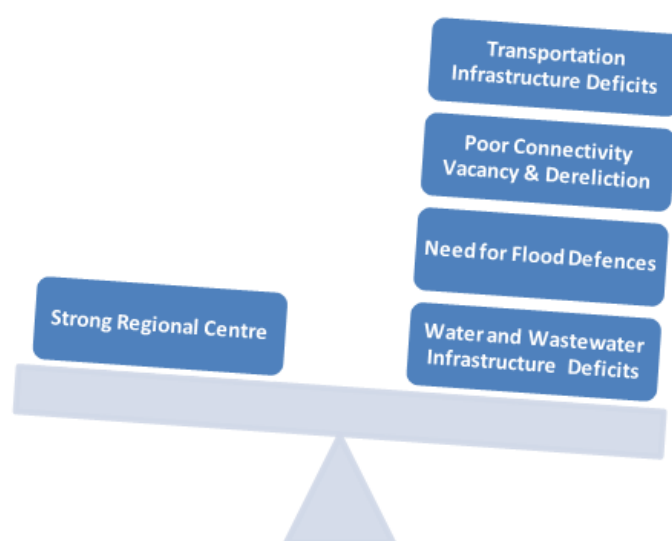


Fig 6.1 Infrastructural Deficits Constraining the Development of Letterkenny as a Regional Centre

Table 6.1 Strategic Infrastructural Deficits

DEFICIT	PROPOSED MEANS OF PROGRESSING SOLUTIONS	LEAD AGENCY & PARTNERS
Strategic Transportation		
Rail Service – Lack of rail service to Letterkenny presents a huge impediment to growth in the town and indeed the region particularly from the perspective of attracting inward investment and visitor numbers to Letterkenny and to the county.	Participation in the All-Ireland Strategic Rail Review.	Department of Transport
Strategic east/north traffic impact on town/town centre on	TEN-T Priority Route Improvement Project, Donegal (Section 2)	Transport Infrastructure

DEFICIT	PROPOSED MEANS OF PROGRESSING SOLUTIONS	LEAD AGENCY & PARTNERS
national road approaches (N14/N56).		Ireland (TII) and DCC
Strategic east-west traffic impact on town/town centre	Southern Network Project	Department of Transport and DCC
Town Centre		
<p>An urban design and transport planning approach that favours the car over other modes of transport;</p> <p>Inadequate active travel and public transport connections between the various sub-areas of the centre;</p> <p>Under-utilisation of central real estate due to low-density, poor quality developments thereon;</p> <p>Under-provision of public realm and parks; and</p> <p>Unsatisfactory levels of vacancy and dereliction.</p>	<p>Comprehensive urban regeneration programme, being progressed by Donegal County Council and stakeholders for the town centre comprising of:</p> <ul style="list-style-type: none"> (i) Preparation of the Letterkenny 2040 Regeneration Strategy (a non-statutory and visionary framework for the regeneration of the town centre) and; (ii) Advancement of a number of key regeneration projects for which funding under the Urban Regeneration and Development Fund has been secured. (iii) Adherence to town centre development policies and strategy. 	DCC, Dept and other stakeholders as appropriate.
Water Services Infrastructure	DCC and Irish Water to prepare a 'business case' for the funding of major investment. The individual items listed below, and further below in the sub-section on the 'Southern Strategic and Sustainable Development Site' to be considered in this context.	Irish Water and DCC.
Projected Wastewater treatment capacity deficiency in medium-to-long term.	Additional Wastewater treatment capacity inclusion in Irish Water's Capital Investment Plan.	Irish Water and DCC
Anticipated deficiencies in wastewater network.	Bespoke engagements with Irish Water for review of existing network in short-term with a view to identified works inclusion in Irish Water's Capital Investment Plan.	Irish Water and DCC.
Port Road/Bonagee Area provision of wastewater network in short-term.	Inclusion in Irish Water's Capital Investment Plan on foot of identification in Network Development Plan.	Irish Water and DCC
Marginal short-term capacity only in drinking water, major challenges in medium-to-long term.	Additional drinking water capacity to be delivered in short-to-medium term, and further significant interventions in medium-to long term to be identified through the full 'options assessment stage' of Irish Water's National Water Resources Plan, currently being progressed in consultation with the Water Services department of Donegal County Council insofar as it deals with Donegal.	Irish Water and DCC

DEFICIT	PROPOSED MEANS OF PROGRESSING SOLUTIONS	LEAD AGENCY & PARTNERS
Flooding		
Parts of town, most notably parts of designated town centre, at risk of flooding.	Escalation of case to a priority investment category in consultation with the Office of Public Works (OPW), and pursue funding thereafter.	OPW and DCC
Sustainable Transport		
Inadequate public transport services and facilities.	Identification and acquisition of preferred site in respect of a Regional Transport Hub.	DCC and DHLGH
	Expansion of town bus services in accordance with NTA-led assessment and plans.	NTA and DCC
Inadequate walking and cycling networks	Establishment of policy basis for improved facilities through the Letterkenny Plan and Local Transport Plan, and implementation thereafter utilising Active Travel funds and similar as they become available and Letterkenny 2040 funding for the town centre.	DCC, NTA and DHLGH
Lack of strategically-located pedestrian river crossings.	Locations of potential new bridges already identified. Funding to be pursued.	DCC and DHLGH
Southern Strategic and Sustainable Development Site		
Undeveloped area located immediately adjacent to town centre due, at least in part, to absence of public services (water and sewer), bridge crossings over River Swilly and deficiencies in local road network.	Advance provision of drinking water and wastewater infrastructure to be pursued with Irish Water.	IW, DCC and DHLGH
	Pursue funding to deliver Southern Network Project road scheme.	DCC and DoT
	Advance provision of bridge crossing to be pursued with DHLGH.	DCC and DHLGH
Glencar		
Glencar and Environs - Provision of community facilities.	Explore funding options and delivery mechanisms.	DCC

The imperative of addressing these shortfalls is addressed in Objective DSC1 below

OBJECTIVE DSC1: To work strategically with other key stakeholders to deliver resolutions to the key infrastructural deficits constraining the growth ambitions for Letterkenny.

Chapter 7: General Development Management Approach and Detailed Policies

Development proposals will be considered in the context of their compliance with zoning objectives as set out in Table 7.1 below, the corresponding zones identified on Map 7.1 entitled 'Land Use Zoning Map', and the zoning matrix contained in Table 7.2 below. The wider policy framework contained in both this Plan and the CDP will also be applied where relevant.

Policy LK-DM-P-1: It is a policy of the Council to support the principle of development proposals that are:

- (a.) Generally consistent with the zoning objectives as set out in Table 7.1 below and the corresponding zones identified on Map 7.1 entitled 'Land Use Zoning Map'; and**
- (b.) Supported in the zoning matrix contained in Table 7.2 below.**

Such proposals will also be considered against the wider policy framework contained in both this Plan and the CDP where relevant, and relevant guidelines.

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 again subject to compliance with the wider policy framework contained in both this Plan and the CDP where relevant, and relevant guidelines.

Policy LK-DM-P-2: In assessing development proposals within Letterkenny, the Council will implement all relevant policy provisions of the operative County Development Plan in addition to the policy framework of the Letterkenny Plan.

Table 7.1 Land Use Zoning Objectives

Zone	Objective
Established Development	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement, including new residential development, subject to all relevant material planning considerations, all the policies of this Plan, relevant national/regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area.
Strategic Community Opportunity	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.
Town Centre	To sustain and strengthen the core of Letterkenny as a regional centre of residential, commercial, retail, cultural and community life and to support active travel and public transport provision.
Primarily Residential	To reserve land primarily for residential development ² .

² Alternative uses may be considered in accordance with the land-use zoning matrix set out in Table 7.2

Zone	Objective
Strategic Residential Reserve	To reserve a quantum of land primarily for residential development as a long term strategic landbank. ³
General Employment and Commercial	To reserve land for commercial, industrial and non-retail purposes ⁴ and car sales
Opportunity Sites	To reserve lands for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area.
Community and Education	To reserve land for community, educational, institutional, cultural, recreational, healthcare and amenity purposes, including ancillary recreational and childcare facilities.
Open Space	To conserve and enhance land for formal and informal open space and amenity purposes, and to make provision for new recreation, leisure and community facilities.
Local Environment	To provide for limited development only ensuring no significant negative impact on the landscape setting or the biodiversity quality of the area.
TEN-T PRIPD/Established Development	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement, including new residential development, and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal subject to all relevant material planning considerations, all the policies of this Plan, relevant national/ regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area.
TEN-T PRIPD/General Employment and Commercial	To reserve land for commercial, industrial and non-retail purposes ⁴ and car sales and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/Open Space	To conserve and enhance lands for formal and informal open space and amenity purposes, to make provision for new recreation, leisure and community facilities and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/Local Environment	To provide for limited development only ensuring no significant negative impact on the landscape setting or biodiversity quality of the area and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/OPP Site 4	To provide for a mix of employment and commercial use, residential use, local neighbourhood-level retail activity and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.

³ Certain uses other than residential may be considered on Strategic Residential Reserve land during this lifetime of this Plan; refer to land-use zoning matrix set out in Table 7.2

⁴ The provision of services ancillary to industry and business including day to day facilities such as childcare facilities and cafes will be acceptable in principle. Proposals for retail uses that are ancillary to a permitted zoned use may be acceptable in principle, subject to the details set out in the land-use zoning matrix and associated footnotes.

Zone	Objective
Southern Strategic and Sustainable Development Site (SSDS)	To provide for a new neighbourhood inclusive of a mix of residential development, neighbourhood level services, schools, community facilities and amenities in a plan-led fashion where infrastructure is provided in a coherent, strategic manner.

Table 7.2 Land Use Zoning Matrix

The Zoning Matrix illustrates a range of land uses together with an indication of their broad acceptability in each of the land use zones.

Notwithstanding an indication of broad acceptability for a particular land-use type within a given zoning, prospective applicants are advised to note that potential vulnerability to flooding will be a material consideration when assessing development proposals and in all cases the Planning Authority will apply the principles and guidance as set out in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities. Further information in relation to flood risk management is set out in Sections 9.4.1 and 12.3 of this Plan. **Please note that the broad acceptability of uses on designated Opportunity Sites is set out in specific policies contained in Chapter 11 of this Plan, whilst the 'Southern Strategic and Sustainable Development Site' is dealt with under Section 10.7**

Y= Acceptable in Principle; O=Open for consideration; N= Not acceptable

Land Use Zoning	Primarily Residential	Town Centre	Established Development	Strategic Residential Reserve	Open Space	General Employment and Commercial	Local Environment	Community and Education	Strategic Community Opportunity
Amusement Arcade/Casinos	N	O ¹	N	N	N	N	N	N	N
Agricultural Buildings	N	N	N	O ²	N	N	O	N	O
Car Park (other than ancillary)	N	O ³	N	N	N	N	N	N	N
Betting Office	N	O ⁴	O ⁴	N	N	N	N	N	N
Cafe	N	O	O	N	N	O	N	N	O
Cemetery	N	N	N	N	N	N	O	Y	N
Cinema	N	O	N	N	N	N	N	N	N
Community/Recreational /Sports	O	O	O	O	O	O	O	Y	Y
Creche/Playschool	O	O	O	N	N	O	N	Y	Y
Cultural Uses/Library	N	O	O	N	N	N	N	Y	Y
Dancehall/Disco	N	O ⁵	N	N	N	N	N	N	N

Land Use Zoning	Primarily Residential	Town Centre	Established Development	Strategic Residential Reserve	Open Space	General Employment and Commercial	Local Environment	Community and Education	Strategic Community Opportunity
Data Centre	N	N	N	N	N	O	N	N	N
Funeral Home	N	O	O	N	N	O	N	O	N
Garage/Car Repair	N	O	O ⁶	N	N	O	N	N	N
Guesthouse / Hotel / Hostel	N	O	O	N	N	N	N	N	N
Hot Food Takeaway	N	O	O ⁷	N	N	N	N	N	N
Industry (light)	N	O	O ⁸	N	N	O	N	N	N
Industry (General)	N	N	N	N	N	O ⁹	N	N	N
Medical Consultancy/Healthcare	N	O	O	N	N	O	N	O	N
Motor Sales	N	N	O	N	N	O	N	N	N
Nursing Home	N	O	O	N	N	N	N	Y	O
Offices	N	O	O ¹⁰	N	N	Y ¹⁰	N	O ¹⁰	O ¹⁰
Park/Playground	O	O	O	N	Y	N	O	Y	O
Petrol Station	N	O	O ¹¹	N	N	O ¹¹	N	N	N
Place of Worship	N	O	O	N	N	O	N	Y	O
Playing Fields	O	O	O	O	O	N	O	O	Y
Pub	N	O	O	N	N	N	N	N	N
Restaurant	N	O	O	N	N	O	N	N	N
Residential	Y	O	O	O ¹²	N	N	O ¹³	N	O ¹⁴
Retail	N	O	O ¹⁵	O ¹⁶	N	O ¹⁷	O ¹⁸	N	N
School/Education	N	O	O	N	N	N	N	Y	Y
Solar Energy Generation (other than exempted dev. or microgeneration ¹⁹)	N	O	O	O ²⁰	N	O	O ²¹	N	O
Tourist Related Facilities	N	O	O	N	N	N	N	N	N

Land Use Zoning	Primarily Residential	Town Centre	Established Development	Strategic Residential Reserve	Open Space	General Employment and Commercial	Local Environment	Community and Education	Strategic Community Opportunity
Warehouse/Store/Depot	N	O	O	N	N	O	N	N	N

Footnotes

- 1 Refer to Policy LK-TC-P-139. Amusement arcades and/or casinos will not be permitted where it is considered that they may have a detrimental impact on the streetscape, established character or residential amenities of an area; nor will they be permitted where the Planning Authority considers that the proposal would give rise to a proliferation of such uses.
- 2 Proposals for agricultural buildings within lands zoned as Strategic Residential Reserve (SRR) must be designed and located so as not to compromise the future residential development potential of the SRR zoned lands.
- 3 In assessing proposals for additional car parking in the town centre, the planning authority will have regard to the provisions of Policy LK-TC-P-08 (Section 9.4.1) of this Plan.
- 4 Betting offices will not be permitted where it is considered that they may have a detrimental impact on the established character or residential amenities of an area.
- 5 Dancehalls/discos will not be permitted where it is considered that they may have a detrimental impact on the established character or residential amenities of an area.
- 6 Garages/car repair will not be permitted where it is considered that they may have a detrimental impact on the established character or residential amenities of an area.
- 7 Hot Food Takeaways will not be permitted where it is considered that they may have a detrimental impact on the established character or residential amenities of an area.
- 8 Light industry will not be permitted where it is considered that the proposal may have a detrimental impact on the established character or residential amenities of an area.
- 9 Developers are advised to have regard to, inter alia, the economic development policies of the County Development Plan 2018-2024, in particular Policy ED-P-14.
- 10 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.
- 11 Developers are advised to have regard to, inter alia, the economic development policies of the County Development Plan 2018-2024, in particular Policy ED-P-14.
- 12 Proposals for multiple (i.e. 2 or more) residential units will not be considered on Strategic Residential Reserve lands. Proposals for single dwellings may be considered where they accord with the Councils housing policies and where they are located and designed so as not to compromise the future residential development potential of the SRR zoned lands.
- 13 Proposals for multiple (i.e. 2 or more) residential units will not be considered on lands zoned as Local Environment. Proposals for single dwellings may be considered where they otherwise accord with, inter alia, the Councils housing policies, conservation policies and policies regarding the appropriate integration of development into the receiving landscape.
- 14 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.

- 15 Developers are advised to note that proposals for retail development in areas zoned Established Development shall be assessed in accordance with the provisions of the Retail Strategy as set out in the County Development Plan.
- 16 Proposals for retail development on lands zoned as Strategic Residential Reserve shall only be considered where they comprise proposals for a farm shop selling goods that are produced on the subject landholding. Other types of retail shall not be permitted at these locations.
- 17 Proposals for retail development on lands zoned as General Employment shall only be considered where the retail element of the proposal is clearly ancillary to the parent/main use of the site, comprises a maximum of 10% of the total floor area of the subject development, and where the goods being sold are a product of that 'main use'. Notwithstanding the foregoing, proposals for retail uses on General Employment lands shall not be permitted if such use would be detrimental to the retail function of the town centre; these matters will be assessed on a case by case basis in accordance with the provisions of the Council's Retail Strategy.
- 18 Proposals for retail development on lands zoned as Local Environment shall only be considered where they comprise proposals for a farm shop selling goods that are produced on the subject landholding. Other types of retail shall not be permitted at these locations.
- 19 Proposals for microgeneration shall be dealt with on a case-by-basis having regard to all relevant policy provisions of this Plan, the CDP and other statutory guidance.
- 20 Proposals for solar energy generation on lands zoned Strategic Residential Reserve may be considered where, inter alia, such proposals are located and designed so as not to compromise the future residential development potential of the SRR zoned lands.
- 21 Proposals for solar energy generation on lands zoned Local Environment may be considered where, inter alia, it can be definitively demonstrated that such proposals would have no significant negative impact on the landscape setting or the biodiversity quality of the area.
22. **With regard to the 'Community and Education' zoning immediately to the north of Ballymacool, this is for the provision of creche/childcare facilities having regard to the scale of existing, and the potential for additional, residential development in the vicinity. The site is not proposed to provide for new primary or secondary school facilities. (The referenced site is the subject of Draft Ministerial Direction to rezone so as not to allow for Community and Education - refer to DCC website for further information)**

Chapter 8 – Economic Development and Employment

The existing critical role of Letterkenny as the key economic engine of Donegal and as a key pillar of the wider North-West economy, and how this critical role has strong support at the national and regional level, is set out in Chapter 2: 'Strategic Context and Growth Ambitions'. Letterkenny already contains a wide range of commercial activities, from the international companies located in the IDA business park, to the service, tourism and retail businesses in the town centre and the industrial uses found in areas such as Bonagee. Letterkenny University Hospital and the Atlantic Technological University are also major employers in the town and indeed the region, alongside their core functions of providing medical and higher education services respectively.

The key employment areas in the town (inclusive of the town centre) are demarcated on Fig 8.1 below.

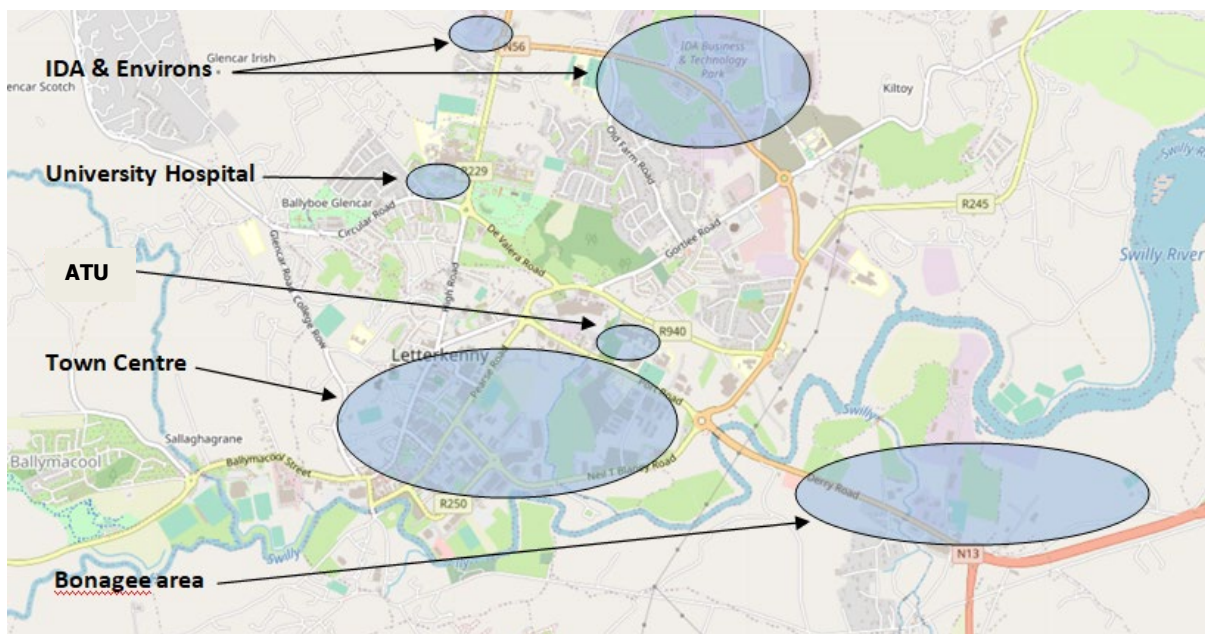


Fig 8.1 Key Employment Areas

National, Regional and County-level policy supports the further economic growth of Letterkenny. For example, the RSES anticipates that job numbers in the town will increase by 5000-6000 by 2040, bringing the overall number of jobs within the town to approximately 17,000. Given Letterkenny's proximity to the border, opportunities may also arise as a result of Brexit. For ICT and knowledge-based industries, the telecoms infrastructure in Letterkenny is excellent, providing resilient connections, a choice of high-speed fibre networks and a range of competitive suppliers.

The role of the Letterkenny Plan is to provide a land-use management framework to enable the assimilation into the town of this growth in an orderly manner. Economic growth will be supported by the full range of place-making initiatives and projects set out in the Plan such as the TEN-T project (and the resulting removal of strategic traffic from the town centre) and improved public transport and active travel measures (with associated improvements in the environment and quality of life for residents). These measures are addressed elsewhere in the Plan. This Chapter addresses issues more directly associated with the economy and employment generation.

8.1 Economic Sectors

8.1.1 Town Centre

Chapter 9: 'Town Centre Strategy', recognises the critical importance of a strong town centre and provides the strategic policy framework to guide its future development. The strategy recognises the need to tackle vacancy and dereliction and provides support for town centre living generally. The strategy also recognises the need to create more successful and attractive linkages throughout the town centre and the need for more high quality public realm, in order to enhance accessibility and visitor experience. Developing the accessibility theme further, the Letterkenny Local Transport Plan (Part B of this Plan) provides policy support for a high quality, multi-modal transport hub in the town centre; a focal point for transport in the town that would provide both for town services (e.g. bus, taxi) and wider regional transport connectivity.

The Letterkenny Plan is timely in light of a growing interest in town-centre locations by many businesses, including those in the ICT and knowledge-based industries. The CoLab Innovation Centre on the ATU campus, for example, has proven itself to be a highly successful centrally-located business space. There is a need to enable the development of additional opportunities of this nature in the town centre in order to foster new business start-ups and attract investment from already-established larger companies in second site locations. Indeed, the process of bringing additional innovation space and employment to the town centre is progressing already with the Council's development of the new Alpha and Beta Business, Enterprise and Innovation Centres on the site of the former ESB yard and adjoining land, located between the Port Road and Pearse Road. These buildings will, amongst other things, provide workspace opportunities for businesses including soft landing spaces for enterprises wishing to establish a base in Letterkenny.

The Council's ambitions for the major enhancement and regeneration of the town centre should further strengthen the attractiveness of the centre to ICT and knowledge-based industries. This is to be welcomed not only in terms of the direct employment that will be created and the increased economic security of the centre derived from diversification of the employment base, but also because of the additional footfall for the traditional town centre retail and services outlets. The Letterkenny Plan therefore supports the development of this sector in the town centre, whilst remaining fully supportive of the more traditional retail and services sector also.

The relevant policy provisions are set out in Chapter 9: Town Centre Strategy.

8.1.2 Atlantic Technological University (ATU)

Donegal County Council acknowledges the importance of the Atlantic Technological University (ATU) as a key economic driver for the town centre, the town in general and indeed the wider region. As well as increasing the attractiveness of the town as a potential investment location by both providing a pool of educated and skilled prospective employees and building the research and innovation capabilities that strengthen the county's economic resilience and competitiveness, the ATU also has a more immediate impact with around 500 staff/innovation centre employees and 3,300 students based at the main campus located within the defined town centre on the Port Road (the success of the Co-Lab facility is recognised above). The contribution of the ATU to the economy and employment offering of the town and indeed wider region is likely to grow, amid continuing collaboration on a cross-border further and higher education cluster with Ulster University, North West Regional College and Donegal ETB (Education & Training Board). Consistent with the Memorandum of Understanding between Donegal County Council and the ATU signed in 2016 and the broader value of the ATU for Letterkenny and the wider region as outlined above, Donegal County Council supports the development ambitions of the ATU and this is reflected in the policy framework below.

8.1.3 Business Parks

The business parks in the town, located principally on either side of the Business Park Road/N56, have been a notable success, resulting in the creation of a major economic hub for the town. At the time of drafting this Plan, these parks were estimated to provide 3000 jobs. It is crucial that the

Letterkenny Plan identifies an adequate land supply for this sector. As with the approach to new residential zonings, the Plan is focussed, where possible, on building on the potential of the commercial areas that already exist, and thereafter on identifying appropriately located new lands.

In preparing the Letterkenny Plan, the Council has consulted extensively with the IDA and has identified not only a need to maintain the existing employment zonings in the Business Park Road area, but also a need for additional lands with the potential to accommodate similar uses to those that currently occupy the existing IDA Business and Technology Park. To this end, the Letterkenny Plan adds to the previously-zoned supply of employment land in the broad Business Park Road area with the following:

- To the west: an additional circa 24 Ha of lands (on lands zoned 'General Employment and Commercial' to the north of Windyhall Road and to the rear of Hegarty's Garage; and on 'Opportunity Site 9' to the south of Windyhall Road);
- To the north: an additional circa 10 hectares (i.e. 50% of overall site) to the north of the IDA Business Park on Opportunity Site 12; and
- To the south: an additional circa 7.2 hectares on Opportunity Site 3.

These locations provide the twin benefits of both being close to the existing Business Park Road campuses (thereby creating opportunities for economies of agglomeration and synergies between businesses), and in most cases also being located immediately adjacent to the national road network, as such allowing for ease of access and providing high profiles for the sites. It is acknowledged that the identified Opportunity Sites may also be developed for other uses in accordance with the relevant zoning objectives and policy applying to them. This is reflected in Table 8.1 below, wherein only 50% of the Opportunity Site area is identified as contributing to the overall supply.



Fig. 8.2 – General Location of lands/plots available on Business Park Rd and environs

In its new strategy 'Driving Recovery and Sustainable Growth', the IDA has committed to delivering Advance Building Solutions in Letterkenny between 2021 and 2024. In addition, Donegal County Council's Economic Development Division is proposing to work with IDA with a view to securing

planning consent for an additional Advance Building Solution to enhance Donegal as an attractive location for investment, allowing the IDA to offer a 'de-risked' site to prospective investors while also conveying a strong collaborative and supportive approach to business.

8.1.4 Industrial Uses

Donegal County Council acknowledges the contribution to the economy of Letterkenny of the many businesses that are more industrial in nature (e.g. light industry, car repairs, warehousing) and less-suited to town-centre locations and business parks. The Bonagee area is a particularly important area in this respect.

Bonagee Industrial Area

A wide range of enterprises are located in the Bonagee area, and the area will continue to play an important role in the commercial life of Letterkenny. Notwithstanding the economic importance of the Bonagee area, a number of factors must be addressed in this Plan, namely that: parts of this area have been identified in the CFRAMS project as being prone to flooding; the area is deficient in terms of servicing, in particular sewerage infrastructure; and the area will also be impacted by the TEN-T roads project.

Chapter 12: 'Climate Adaptation and Mitigation' addresses the potential flooding issues affecting the town in general, including the Bonagee area, having regard to both the Strategic Flood Risk Assessment (SFRA) prepared to inform the Plan and also the 'Planning System and Flood Risk Management Guidelines' (DEHLG, 2009). Based on adherence to the SFRA and the aforementioned Guidelines, the extent of zoned lands that previously allowed for employment uses at Bonagee has had to be significantly reduced.

In terms of the servicing issues at Bonagee, this Plan strongly advocates for a range of strategic servicing issues to be addressed, including the provision of suitable sewerage infrastructure to serve the wider Port Road/Bonagee area (refer Chapter 4: 'Key Structural Issues'; and Chapter 6: 'Strategic Infrastructural Deficits') and the numerous existing businesses that trade there.

Part B: Letterkenny Local Transport Plan, addresses the critical strategic importance of the TEN-T Priority Route Improvement Project, both in terms of the overall County and particularly Section 2 as it affects Letterkenny. In terms of the localised impact on the Bonagee area, the reservation corridor identified on the Zoning Map for this Plan is already adopted Council policy by virtue of the decision of Donegal County Council to make a variation to the Donegal County Development Plan, 2018-2024⁵. This Local Area Plan must be consistent with the County Development Plan.

Additional Industrial Areas

Having regard to the above-noted impacts on the Bonagee area, there is a need to identify new areas of land to complement the offering at Bonagee. In this regard, approximately 8 Ha of additional 'General Employment and Commercial' lands are identified in the Mountain Top area of the town. Further lands have also been identified to the east of previously-zoned lands at Bonagee/Dromore arising from opportunities created by the TEN-T project and associated service roads, given their excellent profile and connectivity to the national road network.

8.2 National Secondary Route N56

National Secondary Route N56 is a key strategic transport corridor, lifeline route and multimodal urban connector in County Donegal; part of which passes through the urban area of Letterkenny. This

⁵ decision of the Council to make a Variation of the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal [Variation No.1] at the Plenary Council meeting of 31st May, 2021 refers

plan seeks first and foremost to preserve the safety, carrying capacity and functioning of the N56 but also recognises that this road is a critical means of access to areas of significant development in Letterkenny, most notably the employment area centred on the N56 Business Park Road. The Plan therefore seeks to ensure that the lands in the vicinity of the N56 can be developed in a sustainable fashion, to the benefit of the Regional Centre and wider County, on the proviso that the strategic functions of the National Road are preserved or indeed improved as development progresses.

The 'Four Lane' section of the N56 Road, from the Dry Arch Roundabout to the Polestar Roundabout is a key strategic transport artery into and out of the town. On weekdays, the average daily traffic before Covid was of the order of 32,000 per day. The Four Lane Road is also an important economic corridor, driven in-part by the exposure of the lands on either side to the aforementioned volumes of traffic. A cohesive policy is required that preserves the vital transportation function of the corridor, whilst also permitting development that does not compromise the aforementioned core function.

Two major projects have also informed policy; firstly, the N56/Four Lane Road Pavement, Active Travel and Safety Improvement Scheme. This scheme commenced in summer 2021, and involves improvements to the 1.4 km of road to provide an urban dual carriageway. The scheme will introduce a reduced speed limit of 60kph, reduces dangerous right turning movements, segregates the current lanes and will include much improved pavement and significant additional cycle and pedestrian facilities inclusive of pedestrian crossings. Separately, signalization is being progressed for the Polestar Roundabout as part of the Letterkenny Traffic Management Project. Another key project to be considered in relation to essential transportation connection is Section 2 of the TEN-T Priority Route Improvement Project, Donegal. This project will provide a second crossing of the Swilly Estuary, thereby diverting a large volume of traffic away from the town centre and the Four Lane road. This link will predominantly serve the Northern half of the town including residential areas, the hospital, Coláiste Ailigh and the IDA centre. This link with the Four Lane road will provide improved accessibility and circulation for all traffic modes through and within the town.

Even after these schemes, and indeed the Southern Network Project, are completed, the Four Lane Road will remain a vital transportation artery for all modes, with each of these routes improving and providing additional alternative critical access to the town to progress and sustain its future proper development and access needs. However, it should be noted that some of these key projects such as the TEN-T and the Southern Network Project are subject to planning, design and approvals. They are not immediate deliverables and will not be operational within the life of this plan. The Four Lane Road will remain the sole lifeline route into the town for the duration of the plan and as such, protecting the Four Lane route and ensuring safety and capacity going forward must remain priorities for Donegal County Council.

Given the nature of the immediate improvements to be provided and the adjacent key urban development lands for the town of Letterkenny, it is proposed that limited and coordinated new access or amended existing access may be considered. Any proposal for a new access or for the intensification of an existing access must clearly demonstrate that it will not affect the capacity, operation or safe function of the road. This road will continue to operate with significant and increasing traffic volumes. While a low urban speed limit is to be imposed as part of the above-noted Four Lane project, all development proposals shall be required to demonstrate an appreciation of the servicing of the wider area rather than focusing on singular sites, as the Planning Authority will be seeking to avoid an ad-hoc proliferation of access points along the Four Lane Road.

8.3 Overall Land Supply for Economic Development and Employment

Arising from the context and growth ambitions as set out above, a range of sites have been identified as being suitable in principle for economic development and employment purposes. The portfolio of such sites may be considered in terms of three zoning designations:

- (i.) General Employment and Commercial;
- (ii.) Opportunity sites; and
- (iii.) Town Centre.

In its zoning considerations, the Council has endeavoured to strike the right balance between, on the one hand incorporating flexibility and not being overly prescriptive in identifying suitable uses, and on the other hand providing clarity for all users of the Plan. The key differentiator, for the most part, between 'General Employment and Commercial' zonings and 'Opportunity sites' is that most of the latter sites are also considered to be potentially suitable for residential development.

'Chapter 11: Opportunity Sites' sets out detailed policies for the Opportunity sites, and Chapter 9 contains the detailed policies for the town centre.

With regard to the sites zoned 'General Employment and Commercial', please refer to the Zoning Map, Zoning Matrix, the Zoning Objectives in 'Chapter 7: General Development Management Approach' and the economic development and employment policies in section 8.5 below. Development proposals otherwise meeting the zoning objective for 'General Employment and Commercial' lands will also be required to be compatible with adjacent uses. In this regard, 'bad neighbour' uses (i.e. uses that would give rise to noise, or emission of air pollutants, or similar) will be a material consideration.

Table 8.1: Zoned Sites Suitable for New Employment-Generating Uses

ZONING/REF (as appropriate)	AREA (Ha)
'General Employment and Commercial' zonings	
IDA Business Park	c. 19
South of N56/Business Park Road	c. 9
North of Windyhall Road	c. 16.5
Behind Hegarty's Garage	c. 5.4
Mountain Top	c. 8
Bonagee Area	c. 5.8
East of TEN-T Road	c. 9.1
South of N56/Four Lane Road	c. 24
Total	c. 96.8
Opportunity Sites – area for employment/commercial use	
OPP 1 Gortlee Hse. (50% of overall site area)	c. 7.25
OPP 2 Gortlee	c. 3.35

OPP 3 Former Unifi (nb – part of site is already occupied)	c. 7.2
OPP 4 Former Creamery	c. 2.2
OPP 5 Behind Mt. Errigal Hotel	c. 2.32
OPP 6 Oldtown Rd.	c. 0.32
OPP 7 Beside Church Of the Irish Martyrs	c. 5.1
OPP 8 Windyhall (50% of overall site area)	c. 7.8
OPP 9 Model Bakery	c. 1.83
OPP 10 Carnamuggagh (50% of overall site area)	c. 9.8
OPP 11 Former Oatfield	c. 1.44
Total	c. 49
Town Centre Sites	
Former ESB site	c.1.1
Former Courthouse	c.0.07

8.4 The Role of Tourism and Hospitality

The tourism and hospitality sector provides quality accommodation, cafes, bars, restaurants, recreational facilities, retail centres, arts/crafts and cultural venues. Such facilities are already a very significant element of the Letterkenny economy, supported by, inter alia, its location on the Wild Atlantic Way (WAW). Letterkenny's attractiveness as a tourism/visitor attraction is expected to grow on foot of the place-making improvements identified throughout this Plan and the Council will continue to support the existing and prospective businesses in the hospitality and tourism sectors.

8.5 Economic Development and Employment – Objectives and Policies

Objective LK-ED-O-1: To build and strengthen Letterkenny as a key centre for economic growth across the sectors and as a university town, commensurate with its Regional Centre status as provided for in the National Planning Framework.

Policy LK-EDE-P-1: It is a policy of the Council to support in principle the appropriate expansion and development of the Atlantic Technological University (Letterkenny Campus).

Policy LK-EDE-P-2: 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.

Chapter 9 – Town Centre Strategy

9.1 Background

Commensurate with its Regional Centre status, Letterkenny town centre is the primary retail and services centre for Donegal. The centre also serves a broader catchment in the context of the North-West City Region. Letterkenny town centre is home to a significant number of commercial and retail operations. The vitality of the centre is also enhanced by strong education, cultural and tourism/hospitality sectors.

Notwithstanding the evident robustness of the centre (also documented in Chapter 8: Economic Development and Employment), significant challenges pervade and in this Plan are considered in terms of three categories:

1. Regeneration Ambitions and challenges in terms of legacy urban design and transportation issues;
2. Other infrastructural deficiencies; and
3. Development Management.

In relation to Categories 1 and 2, Donegal County Council has concluded that a typical regulatory policy framework will be insufficient of itself to deliver on the re-imagining and regeneration ambitions for the town centre. Rather, a range of more direct interventions, both creative and more mainstream infrastructural, are also required. This plan therefore provides high-level policy support for a number of strategic regeneration and public realm interventions that have been identified through the plan-making process, such as –

- The delivery of walking, cycling and parkland infrastructure (LK Green Connect);
- The delivery of a creative hub and urban parkland adjacent to Church Lane, as part of the continued development of the Letterkenny Cathedral Quarter;
- The re-use of the former courthouse;
- The regeneration of the Main Street area (with particular reference to Lower Main St.) and tackling vacancy and dereliction generally;
- The development of a regional transport hub;
- The development of new public realm to complement the existing Market Square;
- Addressing the issue of the dominance of vehicles in the town centre, by supporting proposals that rebalance pedestrian and vehicular space;
- Strengthening the linkages between Main Street and Pearse Road;
- Significant public realm improvements along Port and Pearse Roads, with a view to transforming these key routes into town centre 'boulevards';
- Improvements to public realm and accessibility at Oldtown, the Station roundabout area and the Polestar roundabout area;
- Green and blue infrastructure throughout the plan area, with particular reference to the River Swilly Corridor.
- The need for the use of compulsory purchase powers available to the Council under, inter alia: the Derelict Sites Act, 1990; and the Local Government (Sanitary Services) Act, 1964.

Ultimately, the aim of the Authority is that Letterkenny Town Centre will be transformed from a car-dominated and disconnected centre to one that presents a more attractive and safer environment for all users inclusive of those who wish to live, work, do business in, or visit the town. Section 9.2 identifies a number of key infrastructural deficiencies impacting on the town centre and how they are having a fundamental impact on its performance and attractiveness.

As well as identifying necessary public sector interventions in the town centre, another key aim of the Letterkenny Plan is to harness appropriate private sector investment. A framework is required to manage both sectors and this is set out in Section 9.3: 'Town Centre Development Management'. The section also addresses, inter alia, issues that are typical to most medium-sized town centres e.g.

the most appropriate locations for retail developments, creation of dead frontages, or uses that would not contribute to daytime vitality.

9.2 Infrastructural Deficiencies Affecting the Town Centre

Town centre improvements are not solely dependent on works within the centre; indeed, the environment of the centre could be further improved by a number of other projects that are either located outside of the centre, or that would straddle the town centre and beyond. These potential benefits to the town centre add to the case for their delivery and thus, whilst they are addressed elsewhere in this Plan, they are also briefly discussed below in terms of the beneficial impacts these projects would have on the town centre.

9.2.1 TEN-T Priority Route Improvement Project, Donegal

The TEN-T Priority Route Improvement Project, Donegal (the TEN-T PRIPD) consists of and prioritises three Sections of the TEN-T road network in Donegal for improvement namely:

- Section 1: (N15/N13 Ballybofey/Stranorlar Urban Region);
- Section 2: (N56/N13 Letterkenny to Manorcunningham); and
- Section 3: (N14 Manorcunningham to Lifford/Strabane/A5 Link).

The benefits of the overall TEN-T PRIPD are significant and wide ranging for the County and are addressed in the Local Transport Plan. Specifically in relation to Letterkenny Town Centre, Section 2 of the project will have the added benefit of removing a lot of strategic traffic that currently impacts on the town centre due to the proximity to the centre of the N14/Four Lane Road and the N56/Ramelton Road. As noted earlier in this Plan, Donegal County Council has already adopted the entire extent of the TEN-T corridors by means of a Variation to the Donegal County Development Plan, 2018-2024.

9.2.2 Southern Network Project

The objectives behind the Southern Network Project are addressed in the Local Transport Plan. The benefits to the town centre are similar to those that will accrue from the TEN-T project, in that it would reduce/remove strategic traffic, in this case east-west traffic, away from the town centre, whilst also forming a crucial part of the active travel network envisaged by the Local Transport Plan. Please refer to Part B, Local Transport Plan for relevant policies in relation to the Southern Network Project.

9.2.3 Town Centre Foul Sewer Network

As identified earlier in this Plan, a significant part of the developed town centre is not connected to the public sewer network. The Council will seek to work with Irish Water to have this deficiency addressed as early as possible.

9.3 Town Centre Development Management

9.3.1 Urban Design Issues

A number of core urban design legacy issues have been identified in the town centre and it is considered appropriate that the Development Management policy framework is prepared with that in mind. These core issues are detailed below.

Disconnect between Main St. and New Retail Parks: The rapid growth of the retail core of the town centre during economic boom years has resulted in a disconnect between the Main Street retail area and the more recently developed retail parks. Although in close proximity (approximately only a four minute walk between Main Street and Pearse Road), the physical environment is disjointed and

is difficult and unsafe to negotiate on foot. This adds to the dependency on the car to move between different areas of what is effectively one retail core, and reduces the efficiency and economic performance of the urban core as a whole. This is further exacerbated by a heavily-trafficked Pearse Road, where the car is prioritised and pedestrian crossing points are minimal. As a result, the urban form of the connections between the traditional Main Street and the more recently constructed retail parks performs as a barrier between the two areas.

Decline of Traditional Town Centre: Parts of the traditional town centre are underperforming. In particular, the Lower Main Street area suffers from significant dereliction problems although this issue is also apparent in other parts of the old town centre.

Low Density, Poor Quality Developments on Pearse Road: The Pearse Road area is a central area in the context of the spatial layout of the overall urban core. Such central areas would normally be characterized by high density development patterns. However, the Pearse Road area, and similarly parts of the Port Road area, are dominated by low-intensity uses and low value buildings in terms of construction; notably sheds and showrooms with open storage areas and significant areas of car parking. Given the centrality and profile of this location, higher density developments would be more appropriate in terms of urban design and sustainable development.

Poor Sustainable Mobility: As noted elsewhere in this Plan, the existing urban form of Letterkenny urban core is a car dominated environment where sustainable mobility in terms of public transport, walking and cycling is not readily facilitated. Problems include lack of bus prioritisation at key locations, deficiency in terms of not having an appropriately sized and located transportation hub, limited cycle lane infrastructure, uncoordinated investment in pedestrian linkages and crossing points and lack of pedestrian infrastructure along key links. The consequent over-dominance of the car and poor public transport/active travel usage in the town centre is evidenced and addressed in the Local Transport Plan.

Under-Utilisation of Physical and Environmental Landscape: The potential of the physical and environmental landscape in Letterkenny's urban core remains under-utilised. There are significant vacant, derelict and under-utilised backland and infill lands where the market has not delivered regeneration projects. Environmental resources such as the river have not been integrated into the urban form and indeed development has turned its back on the river corridor, resulting in no public interface with the river habitat. The existing parklands (Ballymacool Town Park, Bernard McGlinchey Town Park and Ballyboe Park) provide high quality recreation, amenity and environmental infrastructure, but are located on the edge of the urban core and have not been complemented by smaller sized 'pocket parks' within the town centre core. Public realm is underperforming throughout the town centre as the competing demands between public space, walkability and the private car remain, with the situation at Market Square being a notable case in point.

More positively, investment aimed at 'greening' Main Street has been made in recent years through planters and seating, but its success is limited due to these competing demands for space along the town centre streets. There is substantial built heritage in Letterkenny that is of value in terms of streetscape and in its detailing, but the value of the town's built heritage has not yet been harnessed to its fullest potential, with the exception of a recent community led project along Church Lane leading to St Eunan's Cathedral (part of the designated Architectural Conservation Area).

9.3.2 Urban Design Policy Framework

The policy framework as outlined below has been specifically framed to enable the disruption of longstanding and disconnected development patterns, and move over time towards creating a more robust sense of place with a co-ordinated place-making approach.

9.3.2.1 Objectives

Objective LK-TC-O-01: To strengthen the urban form of the town centre so as to reinforce the centre as a cohesive, attractive and high quality urban area that is attractive and safe for residents, visitors and investors and is a place where public life can thrive.

Objective LK-TC-O-02: To create a vibrant town centre which is a multi-dimensional, inclusive and inviting place providing a mix of homes, jobs, services, amenities, facilities and experiences.

Objective LK-TC-O-03: To establish the town centre as a gateway for business and enterprise, leading and driving a strong economy in the North West City Region.

Objective LK-TC-O-04: To create sustainable and restorative environments where environmental assets are created and enhanced, and climate change challenges addressed, for the delivery of environmental, physical, social and economic benefits to the town.

Objective LK-TC-O-05: To bring the concept proposals contained in the Letterkenny 2040 Regeneration Strategy through the processes of detailed design, stakeholder engagement and any required statutory approval processes and thereafter to deliver on the collaborative vision of the Strategy.

Objective LK-TC-O-06: To develop an active land management register and database, which shall include mapping of brownfield and other lands, such as vacant, under-utilised or large undeveloped sites, tracking progress on planning applications and identification of barriers to development, with the aim of promoting and co-ordinating development on the lands identified.

Objective LK-TC-O-07: To reduce vacancy and dereliction levels in Letterkenny by 75% over the lifetime of the Local Area Plan via the uptake of public funding mechanisms and schemes and through the encouragement and support of private sector investment.

9.3.2.2 Policies

Policy LK-TC-P-01: It is a policy of the Council to support the ambitions of the Letterkenny 2040 Regeneration Strategy.

Policy LK-TC-P-02: It is a policy of the Council to require that development proposals within the town centre are broadly consistent with, and would not prejudice the delivery of, the Letterkenny 2040 Regeneration Strategy.

Policy LK-TC-P-03: It is a policy of the Council that new development proposals on streets that provide physical connections in the town centre will only be supported where they would not prejudice public safety, public realm, built and cultural heritage, accessibility, character and where they provide for an appropriate mix of uses.

Policy LK-TC-P-04: It is a policy of the Council to support the provision of additional appropriately located and designed residential accommodation in the town centre.

Policy LK-TC-P-05: It is a policy of the Council to support the provision of appropriately located and designed accommodation for financial services, ICT and knowledge-based industries in the town centre inclusive of incubation/start-up units, 'soft-landing spaces', 'second-site' locations, and large-scale indigenous or FDI building space options.

Policy LK-TC-P-06: It is a policy of the Council to support the principle of projects that would contribute to the climate change and biodiversity improvement agendas including, but not restricted to, projects in relation to carbon sinks, green corridors, pollination and sustainable urban drainage initiatives.

Policy LK-TC-P-07: It is a policy of the Council to support in principle the following strategic urban design/public realm interventions in Letterkenny town centre, subject to compliance with all relevant policies and standards contained in this plan and the CDP:

- The delivery of walking, cycling and parkland infrastructure (inclusive of the LK Green Connect project)
- The delivery of a creative hub and urban parkland adjacent to Church Lane, as part of the continued development of the Letterkenny Cathedral Quarter
- The re-use of the former courthouse for appropriate town centre uses
- The regeneration of the Main Street area (with particular reference to Lower Main St.) and tackling vacancy and dereliction generally
- The development of a regional transport hub
- The development of new public realm to complement the existing Market Square
- Proposals that rebalance pedestrian and vehicular space to give greater priority to active travel
- Strengthening the linkages between Main Street and Pearse Road, from both an accessibility and urban design perspective
- Public realm improvements along Port and Pearse Roads, with a view to transforming these key routes into town centre 'boulevards'
- Improvements to public realm and accessibility at Oldtown, the Station roundabout area and the Polestar roundabout area
- The provision of green and blue infrastructure, with particular reference to the River Swilly Corridor.

Policy LK-TC-P-08: It is a policy of the Council to require that development proposals within the town centre area conform to the following design criteria:

- Proposals shall have regard to the Letterkenny Design Guide and the Linkages & Public Space Action Plan, prepared as part of the Letterkenny 2040 Regeneration Strategy.
- Proposals shall provide for distinctive buildings of high architectural quality, which contribute to a distinct sense of place and a quality public realm
- Building lines shall be such that a sense of enclosure is provided to the streetscape (i.e. following established building lines where appropriate or moving the building line closer to the road edge if deemed necessary in order to better define the streetscape)
- Proposals shall promote visual interest through modulation and detailing of architectural elements (e.g. variation in building elevations, variations in roof form, cornices, windows, eaves, frontages and entrances and minor variations in setback).
- Proposals shall provide for minimum 3-storey development along the Pearse Road and 2 Storeys elsewhere in the town centre.
- Proposals shall avoid the use of industrial type cladding on the exterior of buildings.
- Proposals for refurbishment and restoration of vernacular buildings must respect the character of the existing buildings, important views and spaces and historic settlement pattern in terms of scale, height, density, grouping, design and materials.

- **Proposals shall be accompanied by a design statement clearly outlining the rationale behind the concept and chosen design approach**
- **Proposals shall comply with all relevant statutory planning guidelines**

Policy LK-TC-P-09: It is a policy of the Council to:

- **Ensure the retention of traditional shop-fronts as appropriate.**
- **Only approve alterations to existing traditional shop fronts if the proposal is an improvement on what exists. Particular care will be taken over proposals for the installation of blinds, canopies, security grilles and shutters to avoid harm to the visual amenity of the shopping streets; if acceptable in principle they must be designed as an integral part of the shop front design.**
- **Avoid pastiche shop fronts and facades.**
- **Encourage contemporary design resolution where appropriate, avoiding cautious pastiche and given due consideration to the appearance of security lighting and shutters, additional security measures as necessary, signage and advertisements.**

9.4 Additional Development Management Issues

9.4.1 Flood Zones – Town Centre Area

The SFRA that accompanies the Letterkenny Plan has identified that there are two distinct areas of the town centre that fall within Flood Zone A (see Map 9.1 below) –

- (i.) a significant area to the east of the Isle Burn and
- (ii.) a smaller area on the western periphery of the town centre.

Flood Zone B also affects a considerable area, most notably to the east of the Pearse Road (see Map 9.2).

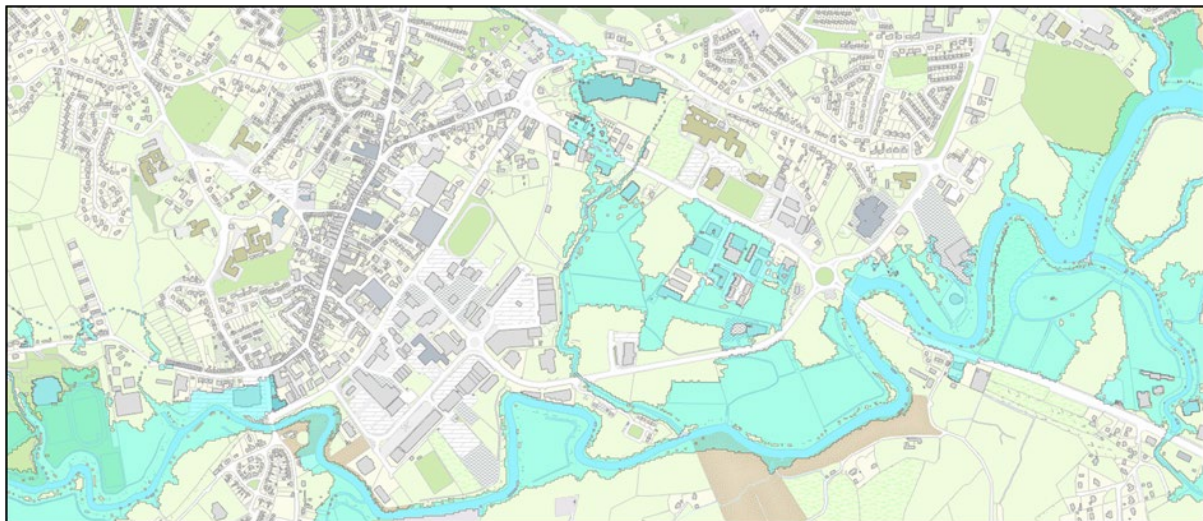
Town Centre Area to the East of the Isle Burn.

The area to the east of the Isle Burn requires special consideration in terms of two policy issues:

1. The principle of appropriate and orderly development outwards from the centre; and
2. the risk of flooding.

Preparatory work and consultation on both this Plan and the Letterkenny 2040 Regeneration Strategy has identified key challenges around the vitality and appearance of the traditional town centre, focussed on Main Street/Lower Main Street and the significant undeveloped or under-developed lands to the west of the Isle Burn in the vicinity of Pearse Road. The significant capacity of these areas in terms of being able to facilitate further development, and the principles of orderly and sustainable development, require that proposals for town centre retail developments should be restricted to west of the Burn, save for ancillary retail floorspace that is otherwise in accordance with the provisions of Policy LK-TC-10.

Having regard to the aforementioned capacity of the area to the west of the Burn, the encouragement of traditional town centre development on undeveloped lands to the east of the Burn cannot be justified in accordance with the requirements of the 'Planning System and Flood Risk Management Guidelines for Planning Authorities'. Policy LK-TC-10 therefore identifies those uses that may be acceptable in principle and includes a recognition of those areas that have already been developed, as well as the opportunities arising from the comprehensive Letterkenny 2040 Regeneration Strategy.



Map 9.1 Flood Zone A within Letterkenny Town Centre (SFRA for Letterkenny, 2022)

Town Centre area West of R250 Pearse Road/Oldtown Road.

A small portion of the town centre area west of the R250 Pearse Road/Oldtown Road also falls within Flood Zone A. Undeveloped lands within the flood zone in this area have been zoned as 'Open Space' in order to address flood risk. Existing developed areas in this part of the town centre have passed a 'justification test' as part of the SFRA for this plan and proposals for development in this location may be subject to limitations pursuant to the findings of relevant justification test (see Section 6.2 of SFRA report).

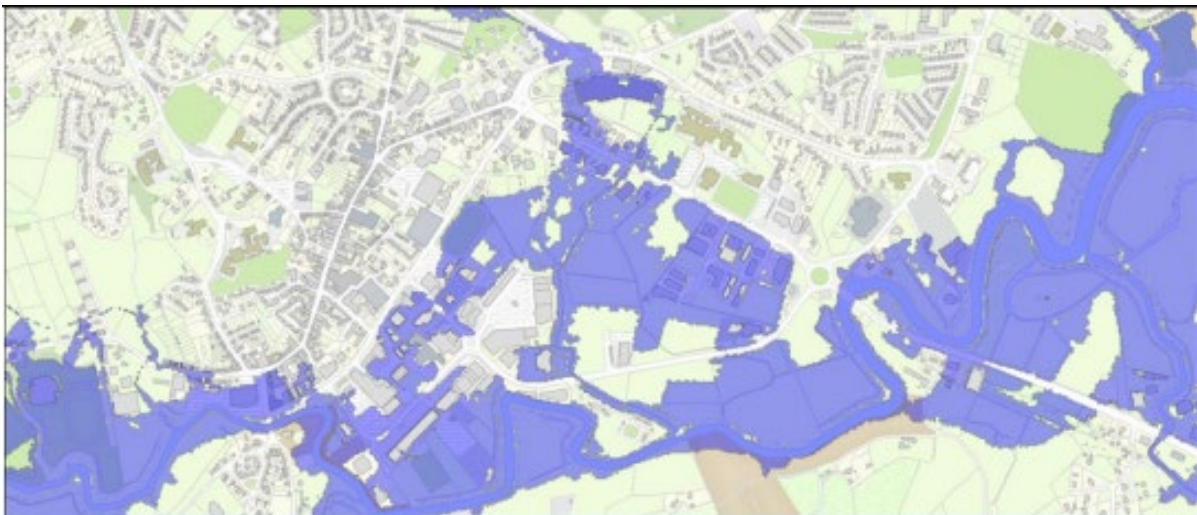
Policy LK-TC-P-10: It is a policy of the Council to only support the principle of the following uses within that part of the designated town centre that lies East of the Isle Burn and south of the Port Road, subject to the findings of a detailed site-specific flood risk assessment as required:

- a. Water-compatible development, as defined in the Planning System and Flood Risk Management Guidelines;**

- b. Expansion of the ATU campus within the limitations set out in Part 3 of the plan-making justification test 2.7 'Justification Test for ATU Site', contained within the Strategic Flood Risk Assessment Report that accompanies the Letterkenny Plan;**
- 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 obstruct important flow paths, do not introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substances 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 subject to the following -**
 - (i) Only water compatible development will be considered within Flood Zone A**
 - (ii) Highly vulnerable development will not be considered within Flood Zone B.**

Comparison and convenience retailing and residential development will not be supported in these areas.

As noted above, the process of delivering a flood defence scheme for Letterkenny has begun, inclusive of the announcement in August, 2023 of a pilot delivery model involving the transfer of the management of data gathering from consultant engineers to the Council. Donegal County Council is committed to reviewing the policy position as set out in Policy LK-TC-P-10 above as and when plans for the flood defence scheme are advanced to a stage where such an informed review would be warranted.



Map 9.2 Flood Zone B within Letterkenny Town Centre (SFRA for Letterkenny, 2022)

Policy LK-TC-P-11: It is a policy of the Council that within Flood Zone B in the town centre, proposed uses that are considered to be highly vulnerable to flooding will only be considered where -

- a. Such uses are to be located at first floor level, above predicted flood levels.**
- b. Appropriate provision has been made for access and egress to and from the site in the event of a flood.**
- c. The proposal has been subject to detailed risk analysis as a part of a site-specific flood risk assessment.**

9.4.2 Parking

The town centre is already very well served in terms of the scale of parking provision with around 5,000 spaces being publicly-available. Indeed there is an over-supply judging by the numbers of unused spaces that can be seen on a day-to-day basis. Given the scale of current supply, and also the objectives around a more pedestrian and cycling friendly town centre driven by this Plan, the traditional policy approach to parking provision requiring defined numbers of spaces is no longer considered appropriate to having a vibrant town centre. Rather, a more balanced approach is required recognising the existing supply and its impact on the functioning and character of the centre, whilst facilitating limited new car-parking in certain circumstances. Such parking should be absorbed into development sites or in the immediate area in an unobtrusive manner where it aligns with the Authority's regeneration and urban design aspirations for the town.

In implementing this policy, alternative parking solutions including financial contributions towards the provision and maintenance of public parking will normally be considered.

Policy LK-TC-P-12: It is a policy of the Council that parking proposals within the designated town centre will only be supported:

- a. for commercial developments in exceptional circumstances, where it would not prejudice the objectives of the Letterkenny Plan;**
- b. for residential and other developments appropriate to the town centre generally, only where such parking can be discretely accommodated within the development, and where the development design satisfies the town centre urban design ambitions of the Council.**

In all other cases, a development contribution will be levied using the framework of the Development Contribution Scheme in force at the time of deciding on any application for planning permission.

9.4.3 Building Heights

Regional Policy Objective 3.7.27 of the RSES supports the preparation of a building heights study to guide the future development of the regional centre, targeting minimum density rates of 50 units per hectare in the town centre and a default rate of 35 units per hectare elsewhere. This plan supports the delivery of such a study in the interests of delivering compact growth allied to a high-quality built environment; a specific action to deliver a building heights study is set out below.

Action LK-A-1: The Planning Authority will undertake a building heights study during the lifetime of this Plan, to guide the future development of the Regional Centre of Letterkenny.

9.5 Retail Development

Chapter 4.2 of the County Development Plan, 2018-2024 (As Varied) (CDP) contains a detailed policy framework for the management of retail development throughout the County. Retail development proposals in Letterkenny will be assessed against the aforesaid CDP policy framework and other relevant policies of this Plan.

9.6 Cumulative Impacts

An over-concentration of certain hospitality and entertainment outlets can have negative impacts, including anti-social behaviour and the creation of 'dead' frontages. In the context of the Authority's efforts to regenerate the town centre, careful management of such uses is required.

Policy LK-TC-P-13: It is a policy of the Council that proposals for amusement arcades, bookmakers, casinos and food take-away units will be considered within the 'Town Centre' zone provided that their development: (a) is not located within or abutting premises consisting of residential accommodation, schools or religious institutions; (b) is not contributing to the over concentration of such uses in a given area causing excessive noise, litter and anti-social hours of operation; and (c) contributes to the enhancement of streetscape and vitality and viability of the area.

Chapter 10 – Housing

10.1 Background

The housing policies contained herein have been drafted with the aim of placing quality at the top of the housing agenda; securing the compact growth and regeneration potential of Letterkenny and providing for residential environments that are attractive and functional. The strategy seeks to provide opportunities for private, social and affordable housing that are proximate to employment services, climate resilient, age friendly, safe and desirable. The housing policies must be read in conjunction with all other relevant policies of the Letterkenny Plan and the County Development Plan.

10.2 Overall Supply and Additional Provision.

10.2.1 Overall Supply

The housing and population targets in the Letterkenny plan are based on the projections contained in the National Planning Framework and the NWRA’s Regional Spatial and Economic Strategy. In this regard, 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 similarly seeks to ‘provide an additional 3,000-4,000 residential units within Letterkenny to facilitate the growth of Letterkenny to a minimum of 27,300 residents by 2040.

The population projections for Letterkenny as set out in the RSES (see table 10.1 below) provide for a growth of 440 persons per annum in Letterkenny between 2016 and 2031, and assuming an occupancy rate of circa 2.6 persons per dwelling unit (as indicated in the results from Census 2022) this would equate to a requirement for approximately 169 dwellings per annum in Letterkenny (for the purpose of calculating housing requirements for the 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 10.1 Projected population growth in Letterkenny (source: NWRA RSES)

Letterkenny 2016	Letterkenny Uplift 2026	Letterkenny Uplift 2031	Letterkenny 2040
Population: 19,300	4,400	2,200	Population: 27,300

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 circa 200 additional dwellings per annum being constructed in the town). However, when we look at housing completions within the Letterkenny CSO boundary since 2016 (see Table 10.2) we can see that in fact only 373 dwellings were completed in the 7- year period 2016-2022 inclusive, rather than the ~1400 projected by the RSES; a shortfall of approximately 1000 units.

In order to meet the growth targets envisaged for the Regional Centre, it is evident that the Letterkenny Plan must provide for the ~200 dwellings per annum projected by the RSES, 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 (NB – 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, arrive at an estimated need for 2300 dwellings in Letterkenny over a 6-year period.

Given the need for the Letterkenny Plan to be consistent with the County Plan, the figure of 2300 units is utilised hereafter for the purposes of calculating the required housing land supply). Table

Table 10.2. Housing Completions in Letterkenny, 2016-2022.

Year	No. of Housing Completions
2016	27
2017	32
2018	52
2019	76
2020	102
2021	46
2022	38
Total	373

RPO 3.7.27 of the RSES stipulates that a default housing density of 35 units per hectare should be considered in Letterkenny, with the exception of areas of high density, where a minimum of 50 units per hectare should be targeted. Assuming a delivery of approximately 300 units within the town centre area over the lifetime of the plan, the density standards set out in the RSES equate to a requirement for approximately 57 hectares of residential land outside the town centre area (i.e. 2000 units at a density of 35 per hectare outside of the town centre area and a further 300 units within the town centre). This basic requirement however, must be further supplemented by additional housing land provision, which is elaborated on in section 10.2.2 below.

10.2.2 Additional Provision of Housing Lands

Section 4.4.3 of the 'Development Plan Guidelines for Planning Authorities' (2022) state that "in providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses) than would equate to meeting precisely the projected housing demand for that settlement", in order to provide a degree of choice in development sites and thereby avoid restricting the supply of new housing development as a result of inactivity on any given site. The completions figures set out in table 10.2 above illustrate the fact that the housing delivery market in Letterkenny has been severely underperforming in recent years. Furthermore, it must be acknowledged that the zoning of a site for residential purposes does not necessarily mean that the site will be brought forward for development. It is therefore essential, in the interests of supporting the growth of the Regional Centre (which in turn will support balanced regional development) that sufficient flexibility is provided in terms of available housing land in Letterkenny. For this reason, the Letterkenny Plan provides for a significant quantum of zoned housing land over and above the basic requirements identified in the Core Strategy of the County Development Plan. This additional provision also takes into consideration other issues that will affect housing demand in Letterkenny over the lifetime of the plan, most notably the significant influx of displaced persons and international protection applicants resident in the Letterkenny area (CSO figures indicate that there have been approximately 1300 arrivals from Ukraine to the Letterkenny-Milford electoral areas since 2022. Furthermore, there were over 1100 International Protection Applicants residing in Donegal in May 2023, many of which are accommodated in the Regional Centre). Whilst the quantum of zoned residential land necessarily exceeds the base provision outlined in the Core Strategy of the County Development Plan, it must be noted that this will not

compromise the compact growth of Letterkenny; indeed, 60% of the zoned residential lands fall within the CSO boundary for the town – far in excess of the 40% requirement set out under RPO 3.7.22 of the RSES.

10.2.3 Housing Location and Land Availability.

In terms of housing location the provision of choice is one of the key themes that emerged during the public consultation exercises undertaken in respect of the Letterkenny Plan. The plan therefore identifies a wide range of housing opportunities with varying characteristics; ranging from town centre lands and infill sites within areas of established development, to sites located on the edge of, or within relatively easy reach of the town centre, thus enabling the consideration of a wide range of housing typologies and densities to cater for the housing needs of all sectors. In all cases, there will be a focus on building communities and ensuring that all necessary physical and social infrastructure is provided in tandem with new housing development. Table 10.2 below sets out details of potential residential lands within the plan area.

Table 10.3 Residential Lands

(Sites identified in yellow rows are the subject of Draft Ministerial Direction to rezone so as not to allow for residential development - refer to DCC website for further information)

Site Ref.	Area (Ha)
Primarily Residential	
PR1	10.75
<i>PR2</i>	<i>6.30</i>
PR3	1.97
PR4	0.79
PR5	14.00
PR6	24.46
PR7	1.14
PR8	0.45
PR9	2.08
PR10	1.23
PR11	9.8
<i>PR12</i>	<i>2.62</i>
PR13	5.2
PR14	0.85
PR15	4.70

PR16	3.90
<i>PR17</i>	<i>3.50</i>
PR18	1.89
PR19	1.74
PR20	1.93
<i>PR21</i>	<i>4.37</i>
Total:	Ha
Opportunity Sites	
OPP1	7.25 (50% of total site area)
OPP2	4.54
OPP3	2.00 (8% of total site area)
OPP4	2.20
OPP5	2.32
OPP6	0.32
OPP7	5.1
OPP8	7.80 (50% of total site area)
OPP9	1.83
OPP10	9.80 (50% of total site area)
OPP11	1.44
Total :	44.60Ha
Total Primarily Residential and Opp. Site housing land:	
Southern Strategic and Sustainable Development Site Total Area	
	34

10.3 Social Housing

Housing Policy Objective 4 of the Governments Housing Plan for Ireland, entitled 'Housing for All', seeks to increase social housing delivery. In line with this policy objective, Donegal County Council will continue to pursue a number of delivery streams to increase social housing provision in the

Letterkenny area, in order to ensure that all sectors of society can have access to a home. The primary means of delivering social housing in Letterkenny to meet this objective include –

- Turnkey Developments;
- Site acquisition;
- Part V;
- Council built developments;
- Buy and Renew Scheme; and
- Schemes delivered by Approved Housing Bodies.

10.4 Objectives (refer also to Objectives in the County Development Plan)

Objective LK-H-O-1: To ensure that an appropriate quantum and mix of housing types, tenures, densities and sizes is provided in suitably located residential areas and in appropriate brownfield/infill areas, in order to meet the needs of the population of Letterkenny, including the provision of private housing, social housing, affordable housing, student housing, traveller accommodation and appropriate residential care solutions designed for older persons and/or persons with disabilities. All housing developments will be subject to compliance with all relevant policies and standards contained in this plan and the CDP.

Objective LK-H-O-2: To secure the provision of all necessary physical and social infrastructure, inclusive of community, educational, health, childcare and recreational facilities, as appropriate, commensurate with the needs of new residential development. All physical and social infrastructure developments will be subject to compliance with all relevant policies and standards contained in this plan and the CDP.

10.5 General Housing Policies (refer also to Policies in the County Development Plan)

Policy LK-H-P-1: It is a policy of the Council to support the principle of multiple residential development (i.e. 2 or more units) on lands where the zoning objective, zoning matrix and/or policy wording pertaining to the subject lands support, or are consistent with, such a use. In determining the appropriate density and form of development on lands zoned as Established Development, the planning authority will have due regard to the site location and context, particularly in light of the compact growth objectives of national planning policy.

Policy LK-H-P-2: It is a policy of the Council to determine appropriate residential densities for housing sites having regard to the provisions of all relevant departmental guidelines, the provisions of Circular Letter: NRUP 02/2021, the specific nature of the development proposed and the site location and context.

Policy LK-H-P-3: It is a policy of the Council to manage the appropriate release of 'Strategic Residential Reserve' lands on the basis of a transparent, evidence-led approach that will involve annual assessment of the uptake of housing land within the Plan area and having regard to the provisions of the land-use zoning matrix. Release of 'Strategic Residential Reserve' lands for the provision of multiple housing development (i.e.

proposals involving 2 or more residential units) shall only occur pursuant to an amendment to the Letterkenny Plan.

Policy LK-H-P-4: It is a policy of the Council to consider limited residential development proposals in areas identified as 'Local Environment' in accordance with the following:

- Proposals for single dwellings within areas zoned 'Local Environment' will only be considered in circumstances where the land in question is in family ownership and where the applicant/s can demonstrate a genuine need to reside on the subject site. Proposals for multiple housing developments (i.e. 2 or more dwellings) within areas zoned 'Local Environment' will not be considered.
- Any proposal for a single dwelling on lands zoned as 'Local Environment' will only be permitted where it can be demonstrated that the proposal:
 - a) Would integrate harmoniously with the local landscape, utilising and retaining key landscape features such as trees and hedgerows and;
 - b) Would not have an adverse impact on the existing character of the area or the residential amenity of adjoining properties.

Policy LK-H-P-5: It is a policy of the Council to consider proposals for single dwellings within areas zoned 'Strategic Residential Reserve.' Proposals for multiple housing developments (i.e. 2 or more dwellings) will not be considered. Proposals for single dwellings will only be permitted on lands identified as 'Strategic Residential Reserve' where it can be clearly demonstrated that:

- The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of comprehensive integrated residential development/s utilising the entire site area;
- The location and layout of the dwelling would not compromise the line of any proposed relief road or the provision of other strategic infrastructure;
- The proposal would not be detrimental to the residential amenity of any neighbouring properties or be injurious to the general character of the surrounding area; and
- The proposal would otherwise comply with all relevant policies and objectives of the Letterkenny Plan and County Development Plan.

Policy LK-H-P-6: It is a policy of the Council to require layouts of residential development to be designed and constructed having regard to best practice in terms of Universal Design, including the guidance for housing development set out in the National Disability Authority publication, 'Building for Everyone: A Universal Design Approach'.

Policy LK-H-P-7: It is a policy of the Council to require that all new multiple housing developments comprising 7 or more units in Letterkenny contain a minimum of 30% residential units that are built to universal design standards, in accordance with the requirements of the National Disability Authority publication 'Building for Everyone: A Universal Design Approach'. Where the total number of units to be constructed is between 2 and 6, it is a policy of the Council to require that a minimum of 1 of those units be built to universal design standards.

Policy LK-H-P-8: It is a policy of the Council to require proposals for residential development to prioritise and facilitate walking, cycling, and public transport and to

include provision for links and connections to existing facilities and public transport nodes in the wider neighbourhood.

10.6 Site Specific Housing Policies

In all cases, developers will be required to provide relevant infrastructural services to support development and create high quality residential environments with a sense of place and connectivity to the wider area. Furthermore, the principles of sustainable, inclusive and environmentally friendly design must be incorporated into development proposals. In addition to the foregoing, the planning authority would also note the following key considerations in respect of certain 'Primarily Residential' sites -

Primarily Residential Site No. 1

Site Area: 10.75 Ha

Key Considerations:

- Permeability through the site, connectivity to existing road and paths in the wider area
- Suitably located and designed open spaces and provision for public transport, walking and cycling.

Primarily Residential Site No. 3:

Site Area: 2 Ha

Key Considerations:

- Increased connectivity through the area.
- Vehicular access shall be provided at the southern end of the site, in order to avoid traffic being diverted through the existing, established housing area to the north.

Primarily Residential Site No. 4:

Site Area: Approximately 0.8 hectares

Key Considerations:

- Developers will be required to ensure that future residents have ease of access to the existing amenity area to the north of the site.

Primarily Residential Site No. 5:

Site Area: 14 hectares

Key Considerations:

- Developers will be required to distribute vehicular traffic accessing and leaving the site by examining the potential for access via the northern, southern and eastern sides of the site.
- Careful attention will need to be paid to surface water management on site, so as to ensure that the risk of pluvial flooding is not increased as a result of the development of these lands.

Primarily Residential Site No. 6:

Site Area: 24.46 Ha

Key Considerations:

- Developers of this site will be required to reserve approximately 1 hectare of 'Primarily Residential Site No. 6' for the provision of a playing pitch and associated facilities.
- The design of any residential scheme will be required to provide for pedestrian and cycle permeability through the site, particularly between Long Lane and Grange Road (L-1174-1) and through to Ballyboe Park.
- Developers will be required to provide multiple points of vehicular access to the site via Dr. McGinley Road (L-2164-1) the Grange Road (L-1174-1) and/or the Northern Network Project (Windyhall Rd).

Primarily Residential Site No. 7: This site of circa 1.1 hectares offers potential for an 'infill' development between the existing housing estates of Windmill View and Stoney Court to the south and east respectively and An Gleann Rua to the north.

Site Area: 1.1 Ha

Key Considerations:

- Existing pedestrian infrastructure along the northern site boundary is presently substandard and accordingly, developers will be required to address this issue to the satisfaction of the planning authority.

Primarily Residential Site No.9 : This site is located on the immediate northern edge of the Town centre with frontage on both High Road and DeValera Road.

Site Area: circa 2 Ha.

Key Considerations:

- An application for development on this site shall require the submission of an appropriately detailed flood risk assessment.
- The Strategic flood risk assessment that informed this Plan identified the need for a buffer around the watercourse that passes through this site and this area has thus been zoned as Open space.
- The protection or diversion of public sewers passing through the site to the satisfaction of the Planning Authority.

Primarily Residential Site No. 10: This site is located in an established residential area, within easy reach of the Oldtown neighbourhood centre and indeed the town centre.

Site Area: 1.23 Ha

Key Considerations:

- Developers will be required to reserve the corridor for the Council's Southern Network Project road scheme.

Primarily Residential Site No. 11: This site is located in an established residential area, within easy reach of the Oldtown neighbourhood centre and indeed the town centre.

Site Area: 9.8 Ha

Key Considerations:

- Developers will be required to reserve the corridor for the Council's Southern Network Project road scheme.
Careful attention will need to be paid to surface water management on site, so as to ensure that the risk of pluvial flooding is not increased as a result of the development of these lands.

Primarily Residential Site No. 14: This small site is located within an established residential area and in close proximity to the ATU. The site offers the opportunity to expand the accommodation offer in the area, whether for private family homes or student accommodation.

Site Area: 0.83 Ha **Key Considerations:**

- Access to the south of the site is constrained by limited road widths and accordingly developers will be required to consider innovative means to enable safe pedestrian access to the site from a southerly direction, in conjunction with the existing established vehicular access.

Primarily Residential Site No. 16: This site is located adjacent to established housing developments at Killylastin/Killyclug, in an area identified by the Regional Spatial and Economic Strategy (RSES) as a location for residential growth.

Site Area: 3.9 Ha

Key Considerations:

- Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Primarily Residential Site No. 17: This site is located adjacent to established housing developments at Killylastin/Killyclug, in an area identified by the Regional Spatial and Economic Strategy (RSES) as a location for residential growth.

Site Area: 2.1 Ha

Key Considerations:

- Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

(This site is the subject of Draft Ministerial Direction to rezone so as not to allow for residential development - refer to DCC website for further information)

Primarily Residential Site No. 18: This site is located adjacent to established housing developments at Killylastin/Killyclug, in an area identified by the Regional Spatial and Economic Strategy (RSES) as a location for residential growth.

Site Area: 1.89 Ha

Key Considerations:

- Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Primarily Residential Site No. 19: This site is located adjacent to established housing developments at Killylastin/Killyclug, in an area identified by the Regional Spatial and Economic Strategy (RSES) as a location for residential growth.

Site Area: 1.75 Ha

Key Considerations:

- Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Site Specific Policies:

Policy LK-H-P-9: In addition to ensuring compliance with all relevant planning policies and technical standards of this Plan and the County Development Plan, it is a policy of the Council to require developers to comply with the following site specific development requirements:

Policy LK-H-P-9a (Primarily Residential Site No. 1):

- (i.)
- (i.) A well lit and secure pedestrian, cycling and wheeling 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; and
- (ii.) In the event that this parcel of land is developed on a phased basis, scheme layouts shall allow for the entirety of the land parcel to be accessed via local road L-1134-1 (i.e. suitable connectivity shall be maintained throughout adjoining layouts to allow vehicular access to the entirety of the site from local road L-1134-1).

Policy LK-H-P-9b (Primarily Residential Site No. 3):

- (i.) Vehicular access to this site shall be provided via the southern end of the site, onto New Line Road.
- (ii.) Site layouts shall ensure that any development provides for increased pedestrian and cycle connectivity between Circular Road and New Line Road.

Policy LK-H-P-9c (Primarily Residential Site No. 4):

- (i.) Developers will be required to provide a pedestrian link to the existing amenity area to the immediate north of the site (unless otherwise agreed with the planning authority), and to ensure that this link is appropriately designed in terms of accessibility, lighting and passive surveillance (i.e. the pedestrian link should be open, well-lit and overlooked by residential units so as to provide a greater degree of security for users).

Policy LK-H-P-9d (Primarily Residential Site No. 5):

- (i.) Developers will be required to provide for the distribution of vehicular traffic associated with the development of this site, by providing for vehicular access to the subject lands from the north (i.e. from the local road bounding the northern side of the site), south (i.e. from Willowbrook/the Elms) and the east (i.e. from College Park), where possible.
- (ii.) Notwithstanding any finalised arrangements in relation to vehicular access, pedestrian and cycle access shall in any event be provided to the site from the north, south and east.

Policy LK-H-P-9e (Primarily Residential Site No. 6):

- (i.) Developers will be required to provide multiple points of vehicular access to the subject lands; via Dr. McGinley Road (L-2164-1), the Grange Road (L-1174-1) and/or the Northern Network Project.
- (ii.) Developers will be required to realign/reconfigure Dr. McGinley Road (L-2164-1) to the satisfaction of the planning authority, in order to provide adequate capacity for additional traffic at this location.
- (iii.) Developers will be required to reserve approximately 1 hectare of the site for the provision of a playing pitch and associated facilities. The location of the lands reserved for the playing pitch shall, inter alia, be such that it would be easily accessible and would benefit from passive supervision from adjacent development.

Policy LK-H-P-9f (Primarily Residential Site No. 7):

- (i.) Developers will be required to provide high quality design proposals that visually address local road L-1152-1 to the north
- (ii.) Developers will be required to remedy deficiencies in the existing pedestrian footpath network bounding the site.

Policy LK-H-P-9h (Primarily Residential Site No. 10):

- (i.) Developers will be required to keep the Southern Network Project road reservation corridor (see land-use zoning map accompanying this plan) free from development. The means of vehicular access to the site shall be designed and configured so as to complement and facilitate the construction of the Southern Network Project.

Policy LK-H-P-9i (Primarily Residential Site No. 11):

- (i.) Developers will be required to keep the Southern Network Project road reservation corridor (see land-use zoning map accompanying this plan) free from development. The means of vehicular access to the remainder of the site shall be designed and configured so as to complement and facilitate the construction of the Southern Network Project.
- (ii.) Developers will be required to carefully consider surface water management on site and incorporate appropriate measures in this regard into the development proposal.

Policy LK-H-P-9j (Primarily Residential Site No. 14):

- (i.) Developers will be required to provide for safe pedestrian access to the site from a southerly direction, in conjunction with the existing established vehicular access.

Policy LK-H-P-9k (Primarily Residential Site No. 16):

- (i.) Developers of this site will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Policy LK-H-P-9l (Primarily Residential Site No. 17):

This site is the subject of Draft Ministerial Direction to rezone so as not to allow for residential development - refer to DCC website for further information.

- (i.) Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Policy LK-H-P-9m (Primarily Residential Site No. 18):

- (i.) Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

Policy LK-H-P-9n (Primarily Residential Site No. 19):

- (i.) Developers will be required to engage with the roads service of the Council in relation to the provision of pedestrian footpaths and the realignment/reconfiguration/resurfacing of key road junctions and road sections in the area as necessary.

10.7 Southern Strategic and Sustainable Development Site

In addition to the housing development opportunities identified on lands zoned as 'Primarily Residential', 'Opportunity Site' and 'Town Centre', the Plan also identifies a key future development area to the south of the River Swilly. Development of this area, hereafter referred to as the Southern Strategic and Sustainable Development Site (SSDS), is currently constrained by the absence of water and sewer networks, a bridge crossing over the immediately adjacent River Swilly and deficiencies in the local road network. Notwithstanding these current constraints, the area is specifically addressed in this Plan because of its location immediately adjacent to the town centre and the sequential growth opportunities that arise. Furthermore, the area has the potential to deliver housing as part of a wider, masterplanned approach that would ensure the integration of neighbourhood level services, schools and community amenities together with opportunities for greatly increased connectivity within the town.

Potential of the SSDS

The SSDS comprises approximately 34 hectares of largely undeveloped land to the south of the River Swilly (see map 10.1). These lands occupy a strategic position on the southern fringe of the town centre and offer a real opportunity to create a high quality, walkable neighbourhood incorporating housing, childcare, schools and neighbourhood level retail and service uses; a neighbourhood that would be fully aligned with the compact growth objectives of the National Planning Framework and that would offer residents the prospect to reside in, and truly interact with, the heart of the town.

Given the prime location of these lands, and the opportunity they present to achieve significant compact growth of the town, it is an objective of the Planning Authority to seek the development of this area. However, significant infrastructural challenges must be overcome if these ambitions are to

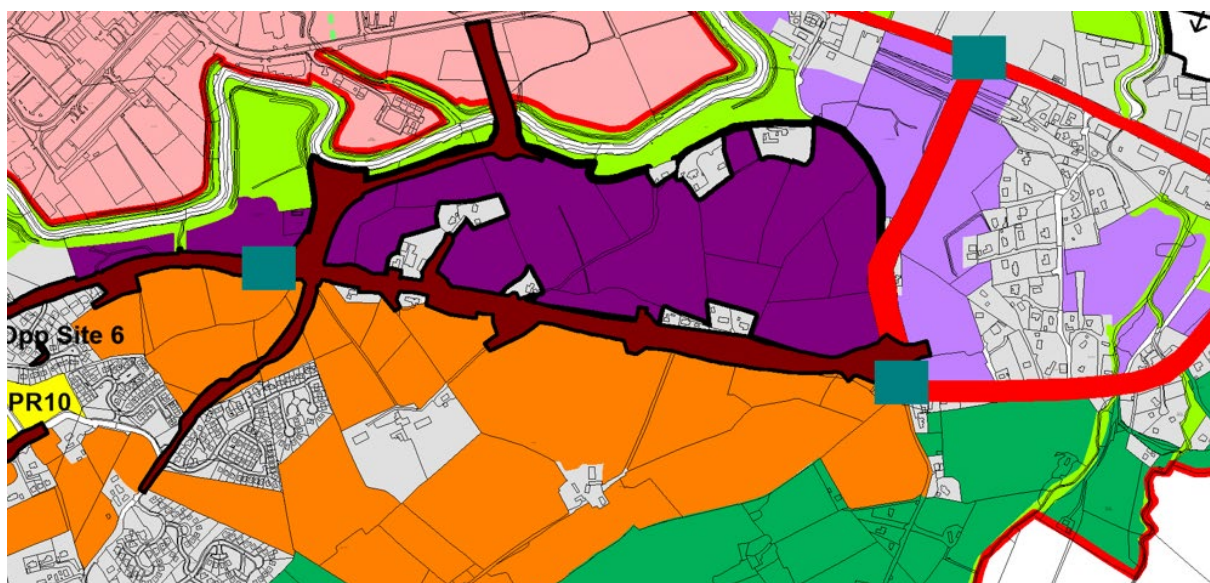
be realised. It is imperative that these infrastructural challenges are addressed on an overall coherent strategic basis and to ensure that individual development sites are not dealt with on a piecemeal or isolated basis.

In terms of access, there are two key issues that must be considered collectively. Firstly, a bridge crossing (both vehicular and pedestrian) over the River Swilly towards the town centre is essential before any significant occupation of lands could be considered. A connection between the required new bridge and Leck Road must also be provided. The route identified on map 10.1 below is the optimum location for such a connection, as identified by the Council during a wider detailed study of the Leck Road area.

The second issue that must be considered is the limitations of local road L-1114 (Leck Road) as it presently exists and the carrying capacity of the Oldtown Bridge. Notwithstanding, a significant proportion of the movements into and out of the planned SSDS are likely to use the aforementioned required new bridge. For this reason, it is considered that development within the SSDS could proceed in advance of the major improvements to the Leck Road envisaged under the Council's Southern Network Project, subject to the new bridge crossing and internal connection to Leck Road being provided, and subject to frontage set-back on the Leck Road as required.

The servicing of this area with sewer and water presents further challenges for all stakeholders. Given the scale of the SSDS, the Council is of the view that the most orderly way to proceed is by way of an agreed overall infrastructure masterplan, with funding and implementation mechanisms clearly identified to the satisfaction of the Planning Authority. The said infrastructure masterplan should address the identified bridge crossing and surface water drainage, as well as foul sewer and water connections. The alternative to the aforementioned is piecemeal infrastructure provision that is likely to result in greater unit costs and longer-term higher maintenance costs for relevant authorities that may also present challenges in terms of effective and robust taking-in-charge of housing infrastructure in the future.

Finally, as already noted in Chapter 6, it is an objective of the Planning Authority (Objective DSC1) to work towards the resolution of infrastructural deficits that affect areas such as the SSDS in consultation with all relevant stakeholders.



Map 10.1 – SSDS and potential link road from town centre

Policy LK-H-P-10: It is a policy of the Council to support significant development proposals within the SSDS only where:

- i. a. A comprehensive infrastructure masterplan has been agreed by the Planning Authority, and funding and implementation mechanisms for the required strategic infrastructure have been clearly identified to the satisfaction of the Planning Authority. The said infrastructure masterplan shall address, inter alia:**
 - **A bridge crossing of the River Swilly and link road to Leck Road,**
 - **Foul sewer connections,**
 - **Water supply connections,**
 - **Surface water drainage inclusive of Sustainable Urban Drainage Systems as required,**
 - **Effective integration of the TEN-T and Southern Network Project road schemes.**
- b. A layout masterplan consistent with the infrastructure masterplan and the masterplanning principles set out in Table 10.3 below has been agreed with the Planning Authority;**
- c. Such proposals adhere to the infrastructure masterplan and layout masterplan referred to above; and**
- d. Detailed arrangements in relation to the provision of the key elements of strategic infrastructure as referred to above have been established to the satisfaction of the Planning Authority.**

The following strategic infrastructure will be required before first occupation of any development:

- **A bridge crossing of the River Swilly and link road to Leck Road,**
 - **Foul sewer connections,**
 - **Water supply connections,**
 - **Surface water drainage inclusive of Sustainable Urban Drainage Systems as required**
- ii. Occupation of development to be provided shall only be permitted where all required strategic infrastructure has been completed to the satisfaction of the Planning Authority.**

The Council is committed to reviewing the Plan in terms of policy for this broad area south of the river, inclusive of the Strategic Residential Reserve lands to the south of Leck Road, as and when development between the River and Leck Road is evidently progressing. The Council will also keep its policy for this area under review in the context of the potential applicability of the ‘Urban Development Zone’ concept being brought forward planning under the Planning and Development Bill, 2022.

Table 10.3 Principles for layout masterplan to guide the development of the SSDS

Vision:	To create a plan-led, diverse urban neighbourhood to the immediate south of Letterkenny town centre; incorporating residential uses, neighbourhood level retail services, schools, community buildings and amenities.
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General Principles – Mixing Uses and Masterplanning	All new development will be expected, where practicable and appropriate to the scale of the proposal, to provide a mix of uses and/or types of dwelling which combines the primary activities of housing and community uses whilst avoiding conflict with other incompatible uses.
Indicative residential density:	35-50 units per hectare (refer also to Policy LK-H-P-2)
Housing types:	<p>Mixed: Apartments, duplexes, terraced town houses, semi-detached units, detached units.</p> <p>Housing around the neighbourhood centre should consist of terraced town houses and/or apartments in a manner consistent with Policy LK-H-P-2.</p>
Indicative building heights:	Up to 3 storeys may be considered. Different configurations may be considered within defined neighbourhood centres.
Landscape and Open Spaces:	<p>Emphasis shall be placed on the quality of design and materials, landscaping, street furniture, signage and the quality of the built environment as a contribution to positive placemaking.</p> <p>Neighbourhood services shall be gathered around a high quality civic space.</p> <p>The layout masterplan shall create streets and spaces that are easy to navigate using key views and buildings as landmarks. The network and orientation of streets shall encourage movement on foot and by bicycle.</p> <p>The layout of all developments shall seek to maximise passive surveillance, security through design and accessibility for all. In this regard, paths shall be well lit and fitted with appropriate street furniture; devoid of potential obstacles; main entrances and areas available for public use shall be clearly visible from adjoining buildings, streets and other areas.</p> <p>The river corridor shall be developed as a public amenity / public open space and provision shall be made for the construction of walkways/greenways/cycleways along the length of the river banks. Clearly legible and aesthetically pleasing routes shall be provided to connect with the river corridor from within the masterplan area.</p> <p>Landscaping shall be designed to promote low carbon neighbourhoods through high quality green (e.g. woodlands, parks, playing fields, natural habitats) and blue (e.g. rivers, ponds) infrastructure.</p> <p>Landscaping shall be designed to provide amenity, promote biodiversity and shall incorporate sustainable urban drainage systems that are planned and built in consideration of future flood risk projections.</p>

	<p>Developments shall be designed to ensure that the primary elevations of any new buildings front onto adjacent open spaces and do not turn their back on or present high boundary treatments to such spaces.</p> <p>Developers shall consider the future management of the landscape, with appropriate measures put in place to ensure future funding of landscape management.</p> <p>Homes shall have access to an area of useable private or semi-private open space as appropriate.</p> <p>Applicants for new major development will be expected to provide public art within the development, having due regard to the importance of involving local artists and local community groups. The provision of any such public art installation shall be subject to local consultation.</p>
Movement and Connectivity:	<p>Proposals shall provide for the development of a network of roads and streets, varying in scale and character, but sharing a similar high quality sustainable and enduring design that is of sufficient quality to contribute positively to the neighbourhood's sense of place.</p> <p>Proposals must provide for the creation of a safe and attractive pedestrian and cycle network with high levels of legibility and permeability, affording direct links to the town centre, local neighbourhood centre and the wider area.</p> <p>Proposals shall be designed to enhance public transport facilities and networks.</p> <p>Traffic speeds shall be managed by providing variation in road corridor width and edge treatments including landscaped margins, rather than via vertical deflection.</p>
Efficiency and adaptability:	<p>Buildings, gardens and public spaces shall be laid out to exploit the best solar orientation.</p> <p>Homes shall be energy efficient and an appropriate proportion shall be designed to allow for ease of adaptation, extension and subdivision where appropriate (e.g. for the creation of an annexe or small office or to allow for the conversion of space in the roof or garage to living accommodation if required).</p> <p>The masterplan should make adequate provision for community recycling facilities. The location of such facilities will be considered at the detailed design stage.</p>
Education:	<p>The masterplan shall make appropriate provision for the reservation of lands for schools, commensurate with the level of residential development proposed and having regard to the capacity of existing schools in the area, in consultation with the Department of Education and prevailing best practice national guidelines.</p>

Flood Risk Management	Development proposals shall be accompanied by a comprehensive Flood Risk Assessment in order to demonstrate that proposed works will not be subject to a flood risk or exacerbate the risk of flooding elsewhere.
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10.8 Developments in Glencar and the Wider Vicinity

As noted in Chapter 14 of this Plan, Glencar is one of the most densely populated parts of Letterkenny, perhaps reflective of its proximity to the town centre and its range of neighbourhood shops and services. Glencar has the potential to become a thriving, edge of centre neighbourhood, fully rooted in the principles of compact growth and offering residents access to a wide range of amenities within a relatively short distance. However, the Glencar area also suffers from significant traffic congestion at peak times and it is crucial that positive intentions regarding the development of the area do not ultimately end up compounding the existing traffic issues. The Council has plans in place to ease traffic congestion in this area, via the development and enhancement of active travel measures and via roads-based initiatives. With regard to the latter, the development of the Northern Relief Road is seen as a key proposal to alleviate traffic congestion and improve circulation on the northern side of Letterkenny. For these reasons, the Council will require the payment of a financial contribution in respect of developments in the Glencar area and wider vicinity that will stand to benefit from the delivery of the Northern Relief Road, thereby ensuring that the necessary road infrastructure is delivered to support additional development on the northern side of the town.

Chapter 11 – Opportunity Sites

The Opportunity Sites identified hereunder present a wide range of development opportunities by reason of their strategic location, scale, nature or current use. The text and associated policies below provide guidance as to the types of development that the Planning Authority would deem appropriate on each site.

Opportunity Site 1: This site, bounded by the Town Park, DeValera, Ramelton and Gortlee Roads, and Whitethorn housing developments, comprises one of the few remaining significant woodlands within the town. The site and the setting of Gortlee House represent a major environmental asset to the town and therefore proposals will be required to demonstrate compatibility with the environmental setting of the site.

Design Guidance for Opportunity Site 1: The concept for developing the site shall demonstrate the following elements:

- That the site is developed as a town park campus, retaining the substantive woodland cover of the site and providing for discrete pockets within which buildings can be introduced into an extended parkland setting.
- That pre-planning consultation be carried out with the Planning Authority.
- That the proposal provides for an extension of the existing town park, linking through to Gortlee Road and providing for the conservation of the existing mature woodland cover with full public access. The substantive areas of new parkland space must be contiguous with and adjacent to the existing town park.
- The setting of Gortlee House is safeguarded when considered both within the confines of the site and from views into the site.
- A high standard of architectural quality shall be achieved throughout, having regard to the nature of the site as an important landmark site. Density within the site will be carefully considered having regard in particular to the heritage value of Gortlee House and the wooded nature of the site.
- Vehicular access to the development shall be achieved via a new access/access improvement on Gortlee Road, subject to engineering and road safety assessment. Proposals to access the site from De Valera Road will only be considered where a clear justification is demonstrated together with evidence of minimal impacts on the town park, and subject to adequate and appropriate engineering and road safety measures both within the site and outside the site.
- Pedestrian and cycle access will be required to link through the development connecting the Town Park, De Valera Road, Gortlee Road and the Whitethorn housing area.
- The public parkland areas shall be served by footway and cycleway access, street lighting and park furniture as required by the Council and provided by the developer.

Policy LK-OPP-1: It is a policy of the Council to support the principle of the following development types on Opportunity Site 1, subject to compliance with all relevant policies and standards contained in this plan and the CDP and subject to adherence to the design guidance for the site:

- Residential (over a maximum of 50% of the total site area),
- Offices,
- Restaurant/Pub/Guesthouse/Hotel use,
- Tourism; and
- Institutional use.

Opportunity Site 2: This site is located along Gortlee Road where there is substantial residential development, the Church of the Irish Martyrs and a range of industrial and employment generating activities to the north of the site. This site presents an opportunity to develop neighbourhood centre uses (e.g. a mix of small local retail units and community services so as to enhance the existing established neighbourhood amenities). The site also offers potential for residential development and office use.

Policy LK-OPP-2: It is a policy of the Council to support the principle of the following development types on Opportunity Site 2, subject to compliance with all relevant policies and standards contained in this plan and the CDP.

- Residential,
- Offices,
- Local neighbourhood level retail activity in accordance with the provisions of the County Development Plan; and
- Commercial use.

Opportunity Site 3: The former UNIFI site is a brownfield site where regeneration is sought through appropriate sustainable uses. Development potential on a portion of the site is constrained somewhat by the existence of a potential flood risk. However, in such areas the site may offer opportunities for development that is deemed less vulnerable to flooding (in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities) subject to the findings of a site specific flood risk assessment, which must accompany all proposals for development on this opportunity site.

Policy LK-OPP-3: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 3, subject to compliance with all relevant policies and standards contained in this plan and the CDP.
 - Employment and commercial use,
 - Car showrooms,
 - Medical related facilities/services,
 - Leisure use,
 - Sports (except sports retail),
 - Wholesale warehousing,
 - Bulky goods retail warehousing; and
 - Residential use (over a maximum area of 2 hectares on the eastern side of the site and only in locations outside of the potential flood risk area, as identified in the Strategic Flood Risk Assessment that informs this Plan).
- (ii.) Require the submission of an appropriately detailed Flood Risk Assessment with all proposals for development on Opportunity Site 3.
- (iii.) Retain and protect the existing belt of mature trees that runs generally from the south-eastern corner of the former Unifi 'plant 2' building to the Kilty Road.

Opportunity Site 4: The former Donegal Creameries site is located proximate to both established residential and employment areas, at a point close to the termination of the TEN-T PRIPD road scheme in Letterkenny.

Policy LK-OPP-4: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 4, subject to compliance with all relevant policies and standards contained in this plan and the CDP and demonstration of compatibility between neighbouring uses.
- Employment and commercial use,
 - Residential; and
 - Local neighbourhood-level retail activity in accordance with the provisions of the County Development Plan.
- (ii.) Require cycle and pedestrian connectivity to adjoining lands to the north and west, unless otherwise agreed with the planning authority.

Opportunity Site 5: This site is located in close proximity to the town centre and the LYIT, in an area that is home to a significant amount of both commercial and residential development. The site offers potential for mixed uses including residential development. Retail uses will not be permitted on this site.

Policy LK-OPP-5: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 5, subject to compliance with all relevant policies and standards contained in this plan and the CDP.
- Residential,
 - Use as a guest house/hostel/hotel/,
 - Nursing home,
 - Community and recreational use,
 - Education and childcare facilities,
 - Office development,
 - Light industry; and
 - Medical/healthcare uses.
- (ii.) Require that vehicular access to the site be provided via the Ballyraine Road to the north of the site and require that development proposals comply with all relevant road safety standards.
- (iii.) Require pedestrian and cycle connectivity through the site in a north south direction (i.e. facilitating pedestrian and cycle connectivity from the N56 to the Ballyraine Road).

Opportunity Site 6: This small site of approximately 0.3 hectares is located adjacent to existing neighbourhood services at Oldtown and presents an opportunity to further consolidate this neighbourhood centre via a mix of uses.

Policy LK-OPP-6: It is a policy of the Council to support the principle of the following development types on Opportunity Site 6, 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,
- Restaurant use,
- Pub use,
- Offices,
- Community use,
- Medical/healthcare; and

- Other uses deemed to be appropriate by the planning authority, having regard to the need to both enhance the service needs of the locality and the need to protect residential amenities.

Opportunity Site 7: This site of approximately 5 hectares is located in close proximity to a good selection of local level services and offers potential for a mix of uses that consolidate this neighbourhood centre.

Policy LK-OPP-7: It is a policy of the Council to –

- (i) Support the principle of the following development types on Opportunity Site 7, subject to compliance with all relevant policies and standards contained in this plan and the CDP.
 - Residential,
 - Commercial use,
 - Offices; and
 - Educational use.
- (ii.) Require pedestrian and cycle permeability through the site in both north-south and east-west directions (i.e. residents must have easy access and connection to existing pedestrian and/or cycle paths to the east, north and south of the site, taking account of the most likely desire lines for pedestrians and cyclists).

Opportunity Site 8: This substantial site of approximately 15 hectares is located in close proximity to a number of major employers and significant community services such as Letterkenny University Hospital, Errigal College and Coláiste Ailigh.

Policy LK-OPP-8: It is a policy of the Council to -

- (i.) Support the principle of the following development types on Opportunity Site 8, subject to compliance with all relevant policies and standards contained in this plan and the CDP.
 - Residential,
 - Commercial and General Employment use that is in keeping with the nature of established development in the nearby IDA Business Park,
 - Community and recreational use,
 - Educational use; and
 - Nursing home use.
- (ii.) Require developers to construct a section of the Northern Network Project along the northern site boundary, to the specification of the planning authority (i.e. developers will be required to complete the Northern Network Project from the Knocknamona roundabout side, westwards to the junction/roundabout that serves the subject lands).
- (iii.) Require pedestrian and cycle connectivity from the site through to Long Lane, and from the south-eastern corner of the site out to the Kilmacrenan Road, unless otherwise agreed with the Planning Authority.

Opportunity Site 9: The former site of the Model Bakery is well located in relation to the town centre and offers opportunities for residential, commercial and educational use. Retail use will not be permitted on this site.

Policy LK-OPP-9: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 9, subject to compliance with all relevant policies and standards contained in this plan and the CDP.
 - Residential,
 - Commercial use; and
 - Educational use.
- (ii.) Require the provision of a pedestrian link to the existing amenity area to the south of the Opportunity Site (unless otherwise agreed with the Planning authority), and to ensure that this link is appropriately designed in terms of accessibility, lighting and passive surveillance (i.e. the pedestrian link should be open, well-lit and should benefit from passive supervision so as to provide a greater degree of security for users).

Opportunity Site 10: This substantial site of approximately 20 hectares offers potential for residential/neighbourhood development and/or development to complement the existing business district in the area / ATU lands to the immediate south.

Policy LK-OPP-10: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 10, 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 10 proceed in accordance with a masterplanned approach which shall be agreed with the Council as part of the planning 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 10 through the lands to the immediate south and on through the IDA business park and,
 - (b.) Provide for pedestrian and cycle connectivity from Opportunity Site 10 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 10 through adjoining lands to the north/northeast, 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 on how all relevant traffic safety policies and standards are to be complied with and
 - (f.) Provide details of collaborations with other landowners in the area as regards the overall development of the masterplan area.

Opportunity Site 11: The former site of the Oatfield factory occupies a prime position at the junction of the De Valera and Ballyraine Roads. Development opportunities on a portion of the site are constrained somewhat by the existence of a potential flood risk and a corridor of 'Open Space'

has thus been allowed for alongside the watercourse that passes through the site, in accordance with the findings of the Strategic Flood Risk Assessment (SFRA) that informs this Plan; however, the majority of the site is outside of the area of concern identified in the SFRA and the previously developed, brownfield nature of the site must also be acknowledged. As such, considerable potential remains for a range of development types, subject to the findings of a site-specific flood risk assessment, which must accompany all proposals for development on this opportunity site.

Policy LK-OPP-11: It is a policy of the Council to –

- (i.) Support the principle of the following development types on Opportunity Site 11, subject to compliance with all relevant policies and standards contained in this Plan and the CDP.
 - Residential
 - Commercial use,
 - Retail (subject to the provisions of the retail strategy of the CDP); and
 - Recreational use.
- (ii.) Require the submission of an appropriately detailed Flood Risk Assessment with all proposals for development on Opportunity Site 11.

Chapter 12 - Climate Adaptation and Mitigation

12.1 Background

Planning has a key role to play in reducing vulnerability to the negative effects of climate change, by promoting compact development, providing for optimum transport and movement solutions, and by ensuring that vulnerable development is not located in inappropriate areas, such as areas of potential flood risk. The opportunities for development within the Letterkenny Plan area have therefore been identified having regard to the need to promote the compact growth of the town and taking account of best available information concerning flood risk. Furthermore, at the project level, the Letterkenny Plan will strive to promote innovative building design and residential layouts that take account of the likely impacts of climate change, thus giving due consideration to energy efficiency, flood resilience, impacts on biodiversity, provision of green and blue infrastructure, re-use of brownfield land and facilitation of public transport; thereby ensuring that the residential and commercial environments of Letterkenny serve as an exemplar in the context of Ireland's transition to a low carbon and climate resilient society.

12.2 Mitigation and Adaptation

Climate change adaptation and mitigation are distinct, but complementary activities. Adaptation refers to the anticipation of the effects of climate change and taking appropriate action to prevent or minimize any adverse effects whilst taking advantage of opportunities that may arise. Adaptation measures in this plan and the CDP 2018-2024 include flood risk management strategies, the promotion of Sustainable Urban Drainage System (SuDS) and the promotion of innovative urban design solutions that respond to the urban environment of Letterkenny.

Mitigation is the process of reducing greenhouse gas emissions to limit the extent to which our climate changes in the future. It involves measures such as improving energy efficiency, switching to more sustainable energy sources and trapping and storing carbon to prevent its release into the atmosphere. Mitigation measures in this Plan include the integration of land-use and transport planning, the promotion of active travel, delivering compact growth and promoting energy efficiency in the design and layout of development.

12.3 Flood Risk Management

As noted in section 4.3.4, considerable areas within the Letterkenny Plan boundary are at risk from coastal and fluvial flooding. Furthermore, the topography of the town is such that the risk of pluvial flooding (overland flow that occurs when the amount of rainfall exceeds the capacity of urban storm water drainage systems or the ground to absorb it) must be carefully considered and managed.

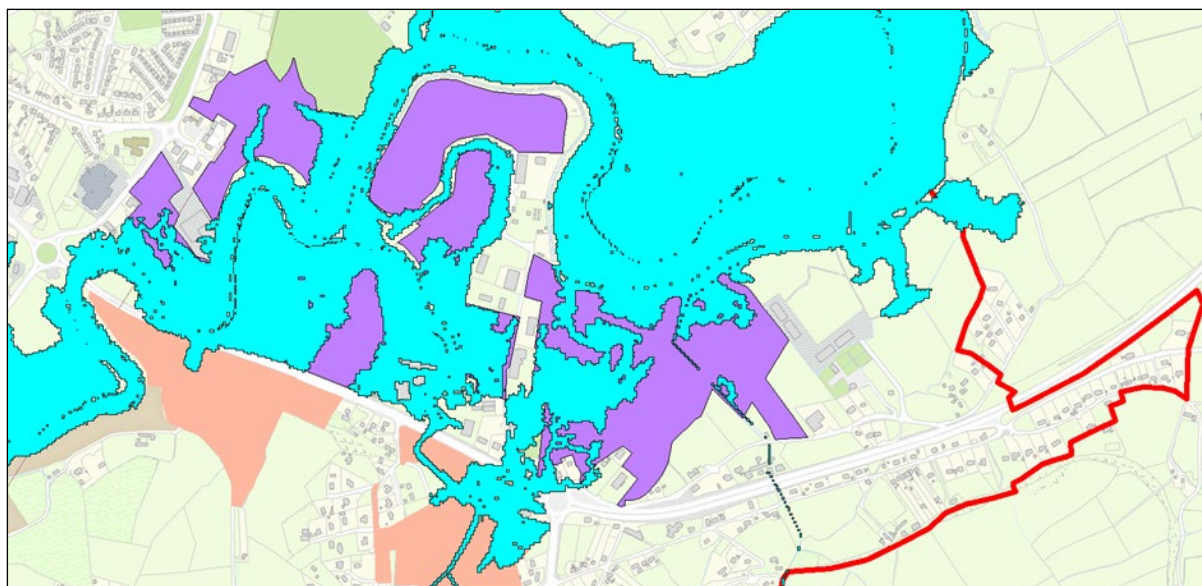
The Strategic Flood Risk Assessment (SFRA) prepared in support of the Letterkenny Plan has highlighted two areas of particular concern as regards flood risk; the town centre area see Section 9.4.1 and the Bonagee area. Furthermore, the SFRA also highlights the fact that areas of existing, established development require careful consideration in the context of flood risk management.

12.3.1 Town Centre Flood Risk and Letterkenny Regeneration Strategy (Letterkenny 2040)
Refer to Chapter 9, Section 9.4.1.

Map 12.1 Flood Zone A within Letterkenny Town Centre (SFRA for Letterkenny, 2022)

12.3.2 Flood Risk in the Bonagee Area

The Bonagee area of Letterkenny is home to numerous commercial enterprises and will continue to function as an important area of economic activity. However, as already noted under Section 8.1.4, the OPW CFRAM study, and indeed the SFRA undertaken in association with this Plan, have identified that this area is particularly prone to the effects of flooding. In accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities, this Plan aims to avoid areas of significant flood risk and hence certain locations that were previously zoned for employment use have been re-zoned as 'open space'. To compensate for the loss of employment lands in the Bonagee and Port Road areas, new areas of 'General Employment and Commercial' land have been provided for in the Mountain Top area and in Bonagee; the latter at locations outside of Flood Zone A. Coupled with the additional supply of commercial and employment lands throughout the town, these zonings ensure that there is adequate provision for economic development and employment generation in the Regional Centre.



Map 12.2 Flood Zone A at Bonagee and the Port Road area (SFRA for Letterkenny, 2022)

12.3.3 Pluvial/Surface Water Flooding

The geography of Letterkenny, whereby the town centre lies alongside the River Swilly at the base of the adjoining valley hillsides, is such that careful consideration must be given to how further development on elevated lands might affect lands at lower elevations, particularly in terms of flooding. In this regard, the planning authority will promote the use of Sustainable Urban Drainage Systems (SuDS) to ensure that new development does not compromise the proper functioning of the urban drainage network. Furthermore, the planning authority will, where appropriate, require developers to provide comprehensive Drainage Impact Assessments (DIA) that detail proposed drainage design for a development (foul and surface water) and that also examine the off-site drainage (ie the efficiency and suitability of the drainage network beyond the proposed development site).

12.3.4 Flood Risk within Areas of Existing Development

There are certain, already-developed parts of Letterkenny that are at risk of flooding. In some of these areas, it is reasonable to expect that there may be proposals for developments of a limited

scale (e.g. small scale infill housing, extensions, or changes of use). Where such development is deemed to be appropriate from a locational, servicing and environmental perspective, the Planning Authority has carried out 'justification tests' as part of the Strategic Flood Risk Assessment (SFRA) report on the Letterkenny Plan, and where the justification test has been passed, those areas remain open in principle for development. The areas of existing development that conflict with flood zones, but where certain development types can be justified, are clearly identified in the SFRA report (see Section 6.2) and prospective applicants are advised to consult said report in this regard. In assessing planning applications within such areas, the Planning Authority will ensure adherence to the principles of the 'Planning System and Flood Risk Management Guidelines' and in this respect will impose limitations on development proposals pursuant to the findings of relevant justification tests (see Appendix B of SFRA report).

12.3.5 Additional Flood Risk Management Policy

The County Development Plan (CDP) contains a comprehensive suite of policies in relation to flood risk management, centred on the guidance and approaches set out in the Department of the Environment, Heritage and Local Government publication 'The Planning System and Flood Risk Management Guidelines for Planning Authorities'. In assessing and managing flood risk within the Letterkenny Plan boundary, the planning authority will utilise both the policy framework set out in this plan and the CDP, thereby providing a solid foundation to ensure compliance with the flood risk management guidelines and effective adaptation to the increasing threat of flood risk on foot of climate change.

12.4 Objectives

Objective CAM-LK-O-1: To ensure Letterkenny transitions to a low carbon, competitive, climate resilient and environmentally sustainable settlement by 2050, via the implementation of the policies and development strategy of this Plan that, inter alia, seek to deliver compact growth, integrated land use and transport, sustainable transport choices, renewable energy production, reduced energy consumption, enhanced ecological biodiversity and climate adaptation measures such as appropriate flood risk management, sustainable urban drainage systems and high quality place-making and design.

Objective CAM-LK-O-2: To work in partnership with Inland Fisheries Ireland and National Parks and Wildlife Service on the construction of any flood alleviation measures.

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).

12.5 Action in Respect of Emerging Climate Change Policy

ACTION: To keep emerging climate change policy and best practice under review and ensure that the Letterkenny Plan remains consistent with future climate change policy formulation.

12.6 Policies

Policy CAM-LK-P-1: It is a policy of the Council to facilitate the provision and roll-out of additional electric charging points at appropriate locations in Letterkenny, in association with relevant agencies and stakeholders.

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-3: It is a policy of the Council to support in principle the development of renewable sources of energy within the plan area and to encourage the integration of micro-renewable energy sources into the design and construction of new developments.

Policy CAM-LK-P-4: It is a policy of the Council to actively promote and encourage high biodiversity value nature-based approaches and green infrastructure solutions within development proposals, as viable mitigation and adaptation measures to reduce greenhouse gas emissions and to increase the adaptive capacity of environments.

Policy CAM-LK-P-5: It is the policy of the Council to support in principle the utilisation and sharing of waste heat in new or extended industrial and commercial developments, where the processes associated with the primary operation onsite generates waste heat.

Policy CAM-LK-P-6: It is a policy of the Council to require, save in exceptional circumstances, that all proposals within public and private developments and within the public realm incorporate the use of SUDs as a nature based approach, to minimise and limit the extent of impermeable hard surfacing and paving and reduce the potential 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 CAM-LK-P-7: It is a policy of the Council to require the provision of energy efficient street lighting in all developments.

Policy CAM-LK-P-8: It is a policy of the Council to require new residential and commercial developments to give due consideration to environmental sustainability and energy efficiency in terms of their siting, orientation, design and construction, and in this regard applications for new residential and commercial development shall be accompanied by a report setting out how these considerations have been integrated into the development proposal.

Chapter 13 – Natural and Built Heritage

13.1 Background

The natural landscape setting enjoyed by Letterkenny, including the backdrop of hills to the north and south and the river corridor comprised of the River Swilly and Swilly Estuary running through the centre of the town, is one of the town's greatest assets, offering immense amenity value in addition to supporting biodiversity and contributing to a sense of place and identity. Kilty Woods Proposed Natural Heritage Area is another asset for the town on its eastern side. Likewise, the significant built and cultural heritage is a reminder of the history of the town and contributes to its streetscapes. This heritage includes the Architectural Conservation Area (ACA) centred on the Cathedral area, twenty structures on the Record of Protected Structures (RPS), twenty structures on the Record of Monuments and Places, two historic graveyards and some seventy-nine properties listed on the National Inventory of Architectural Heritage (refer to Appendix B for details). The natural heritage includes the Lough Swilly Special Protection Area (SPA) and the Lough Swilly Special Area of Conservation (SAC), both of which have an environmental influence on the town.

This Plan seeks to manage the built and natural heritage of Letterkenny whilst allowing for carefully considered interventions where such interventions may be justified. The broad policy framework contained in the County Development Plan 2018-2024 (As Varied) is already an effective suite of policies for the management of development proposals in Letterkenny (refer Chapter 7: 'The Natural and built Heritage'). These policies will be applied as appropriate in the consideration of planning applications that may impact on the heritage of Letterkenny. In addition to this broad framework, Letterkenny-specific policies are included in this Plan that will be material to the consideration of planning applications in the town where relevant.

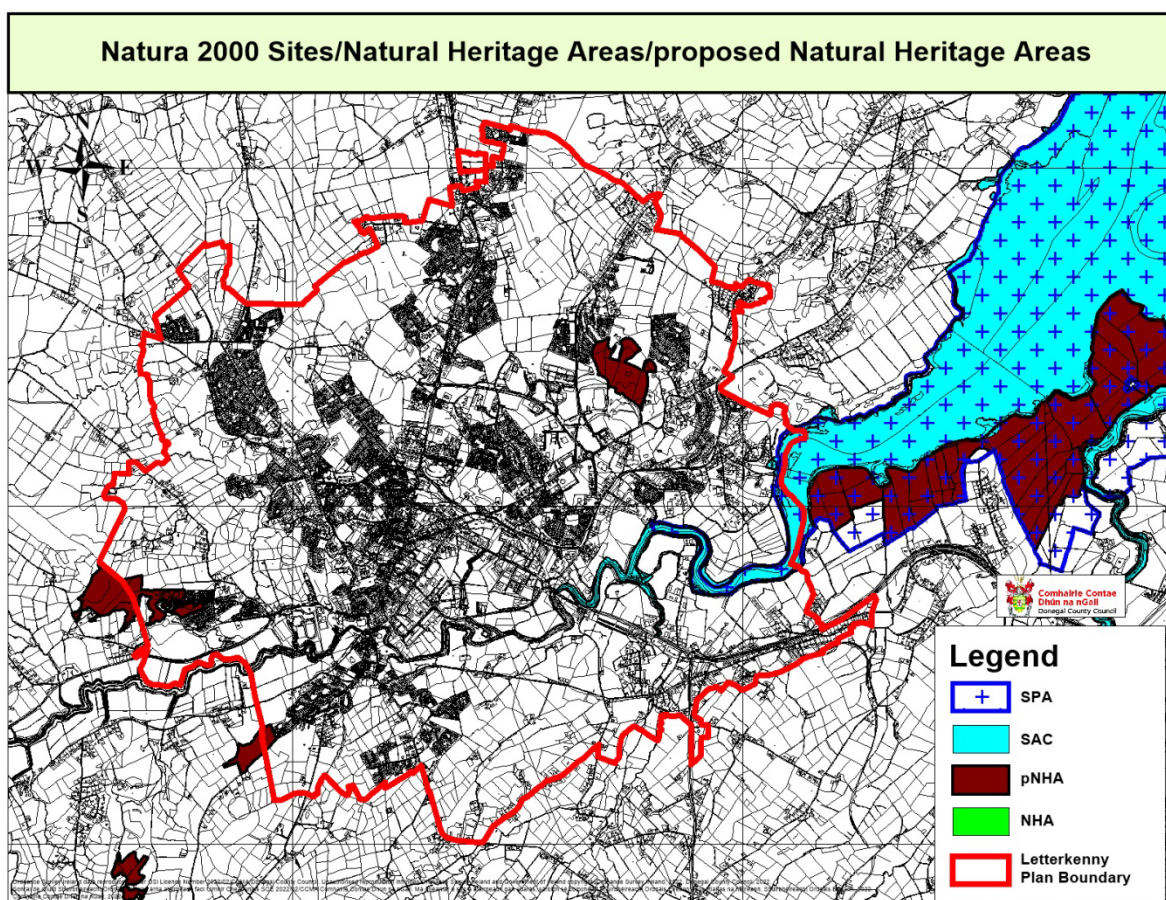
13.2 River Swilly/Swilly Estuary

At the heart of town, but yet somewhat removed from the focus of the built environment, the River Swilly is currently an under-utilised resource. The river offers opportunities, particularly in and around the town centre, for a number of uses including the creation of new amenity space, recreational corridors and flood management areas. Given this potential, and given the Council's vision for, and investment in, the regeneration and re-imagining of the town centre, it is considered reasonable to expect private sector development to also embrace the river as a positive feature. All developments in the vicinity of the river must also ensure protection of the SPA and SAC.

Objective LK-NBH-O-1: To ensure that an Appropriate Assessment, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2010), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest.

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 . 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 and 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.**



Map 13.1 Natura 2000 Sites/Natural Heritage Areas/proposed Natural Heritage Areas

13.3 Letterkenny Cathedral Quarter Architectural Conservation Area (ACA)

The positive and ongoing work in Letterkenny's Cathedral Quarter shines a light on the opportunities that exist through the reinvigoration of our traditional streetscapes and buildings. The special character of the Cathedral Quarter ACA (see Map 13.2) is derived from its rich settlement history,

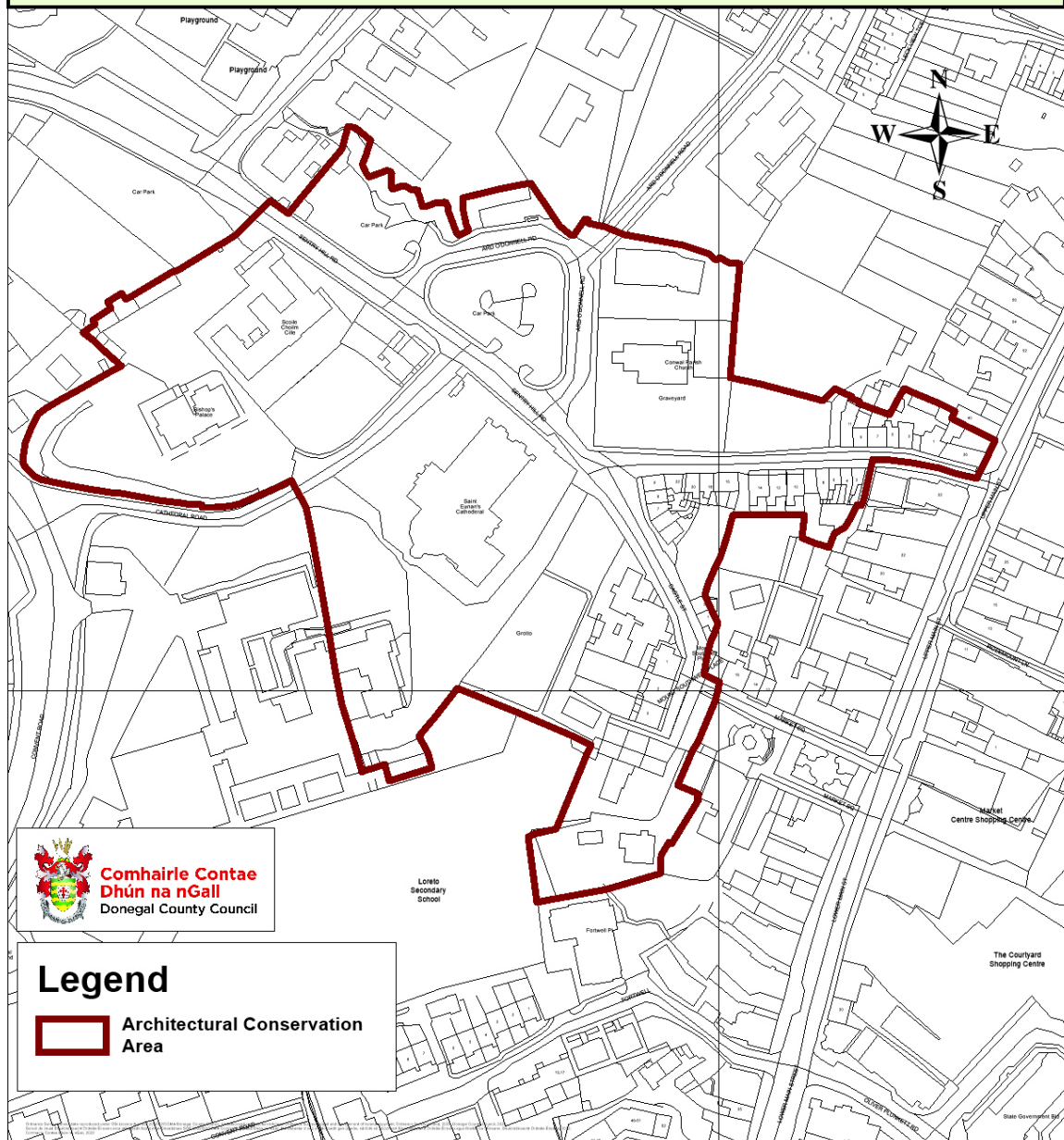
being the original historic core of the town. The ACA contains many architectural resources, from its imposing terraced houses at Mount Southwell and its more modest residential streetscapes, to its concentration of spacious school sites and important detached ecclesiastical landmark buildings, with their notable landscape settings and use of traditional building materials in their architecture. One of the most significant landmarks is St Eunan's Cathedral, with the prominent setting of the Cathedral resulting in fine views and vistas afforded throughout the townscape.

Remnants of vernacular buildings and the layers of other architectural styles add to the special character of the ACA. The retention of outbuildings and stone boundary walls to the rear of the streetscape also heighten the special interest of this area. The use of a traditional palette of materials, inclusive of rubble stone, traditional render, welsh slate, painted timber and iron work, all contribute further to the character of the ACA. Some houses retain features such as sash windows, railings and other boundary treatments that add to the attractiveness of the streetscapes. However, over time some original features and palettes of materials have incrementally been lost from buildings and have been replaced by modern inappropriate materials. In 2019, works were undertaken under the Historic Towns Initiative to reinstate the original palette of materials into Lower Church Lane, which has significantly enhanced the character of this section of the conservation area, reduced vacancy levels on the street and instilled a sense of pride in terms of the connection of local people with the history of their area. In general terms, it is a combination of all of these elements that contribute to the special character of the Cathedral Quarter ACA and the Council will continue to encourage property owners to reinstate original materials and features when modern materials or features fail and need to be replaced.

The Cathedral Quarter has established itself as a cultural destination and area for the arts, community events, local businesses and tourism. It is important that any interventions in terms of the public realm, which has a significant role to play in terms of improving the vibrancy of the area, are of high quality and meet the needs of the residents, businesses and visitors to the area whilst also relating appropriately to the historic character of the ACA.

With regard to the foregoing, Appendix C of this Plan sets out detailed guidance for developments within the ACA and developers are advised to have due regard to this guidance, as well as to Policy LK-NBH-P-3 below when designing proposals. Demolition of existing building stock which contributes to the character of the area will not generally be permitted. New build, whether modern or traditional in style, should be designed to contribute positively to the character of the area and the Council will be seeking to ensure that all development proposals complement and enhance the ACA.

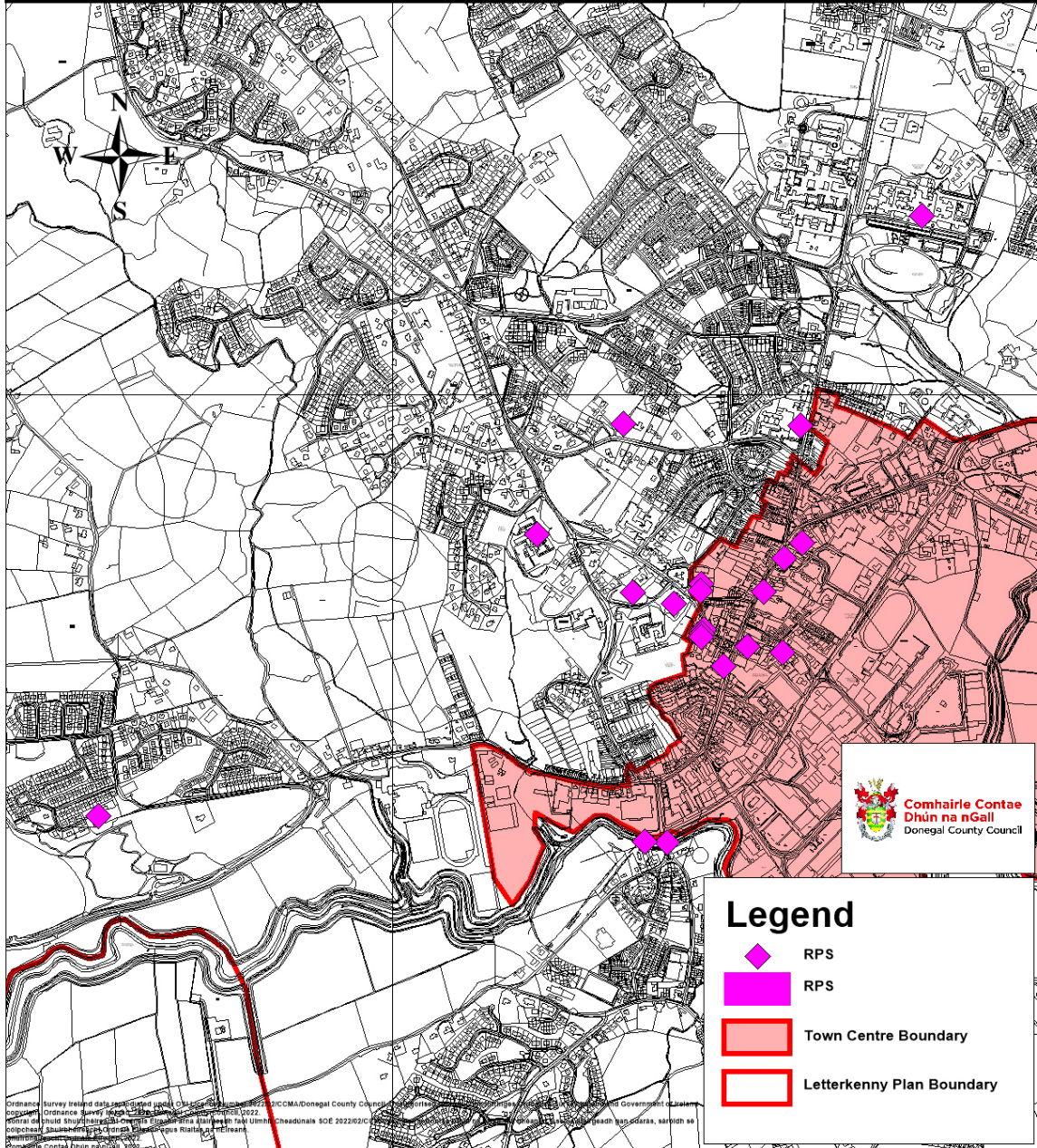
Letterkenny Cathedral Quarter Architectural Conservation Area



Map 13.2 Letterkenny Cathedral Quarter ACA

Map 13.3

Record of Protected Structures



Map 13.3 Location of RPS structures within Letterkenny

Policy LK-NBH-P-2: It is a policy of the Council to protect and enhance the special character of the Letterkenny Cathedral Quarter ACA.

Policy LK-NBH-P-3: It is the policy of the Council to manage the ACA as follows:

- (a) The Council shall ensure that any development in the ACA will be carefully controlled to protect, safeguard and enhance its special character. The special character of the area includes its traditional building stock and material finishes, spaces, streetscape, landscape and setting.**
- (b) Streetscape views within, into and out of the ACA shall be maintained, enhanced and protected, particularly with reference to the character of Cathedral Square, Church Lane, and Castle Street**
- (c) It is the policy of the Council to ensure that any developments, modifications, alterations or extensions affecting a protected structure, adjoining structure or structure within an Architectural Conservation Area, are sited and designed appropriately and are in no way detrimental to the character or setting of the structure or surrounding area.**
- (d) It is the policy of the Council to protect structures recorded on the RPS and features that contribute to the character of the ACA.**
- (e) In consideration of applications for development within the ACA, the following principles will apply:**
 - Proposals will only be permitted where they positively enhance the character of the ACA.**
 - The siting of new buildings will, where appropriate, retain the existing street building line.**
 - The massing and scale of any new building form will respect and positively integrate with neighbouring buildings and the character of the area.**
 - Architectural detailing of historic buildings will be retained and restored.**
 - In respect of developments within an ACA and where, in the opinion of the planning authority, the application of car parking standards otherwise required by this Plan negatively impacts on the character of an ACA, the Council will consider a Financial Contribution in lieu of shortfall in car parking spaces.**

Planning applications for development within the ACA must include sufficient and detailed documentation to inform the proposed development, supported by a written assessment of the proposed development on the character of the area, completed by a suitably qualified individual with experience working with historic buildings. Pre-planning discussions with the planning authority shall be required in advance of making any formal application.

13.4 Long-Established Residential Areas

There are a number of long-established residential areas within and on the edge of the traditional town centre. Notwithstanding the regeneration ambitions for the town centre, it is reasonable to ensure that these communities are protected and not impacted negatively by development activity in and around the town centre.

POLICY LK-NBH-P-4: It is the policy of the Council to protect the architectural, cultural and historic value of residential communities within and on the edge of the town centre that are identified as 'Long Established Residential Areas' on the land-use Zoning Map (Map 7.1).

Chapter 14 – Social, Community and Culture

14.1 Background

It is well recognised that the creation of sustainable places is about more than the delivery of residential units; rather it is the case that a host of ancillary services, facilities and amenities must be provided to ensure that towns and neighbourhoods develop as functional communities. Letterkenny is host to a wide range of social, community, cultural, educational, recreational and public service facilities that serve the town and the wider County, and indeed the far-reaching service role of Letterkenny has recently been consolidated further as a result of its recognition as a Gaeltacht Service Town, given its significant role in providing services to Gaeltacht areas of the County.

14.2 Community Facilities at Glencar

Notwithstanding the extent of services available in Letterkenny, this Plan recognises that some of the most densely populated parts of the town, (and most notably the Glencar area, which contains approximately 3,000 dwellings) are lacking in terms of certain community and recreational facilities. In terms of the sequential development of Letterkenny, areas such as Glencar are considered to be ideal, being located close to the town centre and already having a certain level of neighbourhood services. However, significant levels of additional residential development in Glencar would not be appropriate without ensuring that commensurate levels of community and recreational facilities are delivered in parallel with new homes. Specific actions for the Glencar area in this regard are therefore set out below.

Action GC-A-1

Donegal County Council will explore all options and potential funding and delivery mechanisms, (including but not limited to the use of planning conditions and development contributions) to secure the provision of appropriate community facilities for the Glencar area commensurate with levels of new residential development, subject to compliance with all relevant policies and standards contained in this plan and the CDP. These will include :

- i. The re-imagining of Ballyboe Park, including provision of a children's play-park;
- ii. The provision of a football pitch and associated ancillary area sufficient to meet local league standards;
- iii. The provision of a community building that would accommodate changing rooms for the football pitch and space for community/youth gatherings/events;
- iv.
 - a. Development of a detailed Active Travel (walking and cycling) action plan for the broader Glencar/Long Lane area, with e.g. links down to schools on College Road also incorporated;
 - b. Development of the relevant section of the key active travel link from Glencar to Long Lane to Windyhall;

14.3 Burial Grounds

The Council recognises the need for the appropriate provision of burial facilities to serve the range of community needs within the area. In particular, the Council note the requirement to establish an appropriate location in respect of multi-denominational and non-religious burial services. Deciding on the correct location for such facilities involves detailed assessment on many levels, including amongst other things issues such as land-take/area requirements, potential environmental implications, traffic safety issues and integration with neighbouring land-uses. The land-use zoning map that

accompanies the Letterkenny Plan identifies an area to the east of the existing Leck Graveyard with a 'Community/Education' zoning, thus opening this area up for possible expansion of the existing graveyard if deemed appropriate. Further opportunities for burial grounds may exist outside of the plan boundary and the planning authority will continue to work proactively to identify suitable lands to cater for the burial needs of the expanding Regional Centre.

14.4 Cultural Venues and Public Spaces

Letterkenny is well served by cultural venues, including amongst others the County Library on St. Oliver Plunkett Road, the County Museum on High Road and the Regional Cultural Centre and An Grianan Theatre on Port Road. With regard to the latter three, linkages between the Port and High Roads are to be enhanced and promoted on foot of the 'Re-imagine' project⁶, bringing cohesiveness to the cultural offering in this part of the town and improving the visitor experience.

In terms of public green spaces, Letterkenny offers three very attractive and well maintained parks; namely Ballymacool Park, Bernard McGlinchey Park and Ballyboe Park, the latter of which has potential to better serve the Glencar area as discussed at Section 14.2 above. Research has shown that urban green space, such as parks, playgrounds, and residential greenery, can promote mental and physical health and reduce morbidity and mortality in urban residents by providing places to relax and alleviate stress, stimulate social cohesion, support physical activity, and reduce exposure to air pollutants and noise. As Letterkenny continues to grow therefore, it will be important to protect the existing recreational assets of the town and develop new green spaces for leisure and play, both formal and informal.

In the town centre, a competition was launched in 2020 for concept design proposals to redesign the Market Square for use as a more functional and inviting public space. Illustrations of the winning design proposal can be seen in Fig. 14.1 below. It is envisaged that more definitive design work will be undertaken in the near future and that this will be published for consultation purposes with the aim of securing Part VIII planning consent to deliver a reinvigorated public space for the town. Such works, coupled with the ongoing town centre regeneration process, will ensure that the core of Letterkenny remains attractive as a place for social gathering and events.



Fig 14.1 Winning design concept for Market Square⁷

⁶ An Irish Architecture Foundation project, supported by the Creative Ireland Programme's National Creativity Fund, to promote the physical linkage between the County Museum, An Grianan Theatre and the Regional Cultural Centre.

⁷ Designed by Joseph McCallion, Landscape Architect

14.5 Social Infrastructure

14.5.1 Background

Social Infrastructure refers to services and facilities which are essential for health, wellbeing and the social development of a town. Social infrastructure facilities include for example, schools, public transport, health services, doctors' surgeries and community specific services, as well as areas which can offer active sports and passive recreational activities such as the town parks referenced in Section 14.4

14.5.2 Health and Education

With regard to health services, Letterkenny has a wide range of facilities including Letterkenny University Hospital; child, family and community mental health services; addiction and counselling services; GP clinics and dental practitioners. Likewise, the town is well served in terms of educational institutions, being home to the third level Atlantic Technological University (ATU), four secondary schools and eight primary schools that serve the town's population. Going forward, the Letterkenny Plan identifies opportunities for new school construction should same be required, facilitates the appropriate expansion of the University Hospital through suitable land-use zoning and supports the provision of new healthcare and childcare facilities at appropriate locations throughout the town (the provision of childcare is expanded upon in Section 14.6 below).

14.6 Childcare

Childcare facilities are a critical part of the social infrastructure of successful urban areas; in many cases supporting the maintenance of the workforce, promoting social inclusion and contributing towards the social and educational development of children.

The Letterkenny urban area is served by 20 childcare facilities, providing early learning and care to approximately 1500 children; with a further 800 childcare places provided outside the town area.⁸ Currently all services are at capacity and are operating waiting lists. Given the ambitious growth aspirations for Letterkenny, it is imperative that suitable childcare facilities are provided in tandem with new development, and in this regard the Council will require the provision of new facilities in accordance with the standards set out in the Government's 'Childcare Facilities Guidelines for Planning Authorities' (2001), which set a benchmark provision of one childcare facility per 75 dwelling units, but which also allow for revised thresholds, having due regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. The scale and unit mix of proposed development will also be a consideration in terms of determining requirements for childcare facilities. In implementing planning policy with regard to childcare in Letterkenny, the Council will actively consult with the Donegal County Childcare Committee in order to determine the extent of childcare needs in given areas.

14.7 Universal Design

The urban area of Letterkenny must be developed in a manner that acknowledges the diverse abilities of its residents, workers and those visiting the town. Donegal County Council recognises that people should be able to use buildings and places comfortably and safely, as far as possible without special assistance and that, as a basic principle of good design, places should be accessible, convenient and pleasurable for all to use. Policy LK-H-P-6 of this Plan (Section 10.5) requires that layouts of new residential developments be designed and constructed having regard to best practice in terms of Universal Design, whilst Policy LK-H-P-7 requires that a minimum of 30% of units within new

⁸ Source: Donegal County Childcare Committee, April 2021

residential developments be constructed to universal design standards. Coupled with the implementation of all government guidance and standards in this area, which Donegal County Council is committed to, this Plan and associated strategies will ensure the development of Letterkenny in a sustainable and fully inclusive manner.

14.8 Objectives

Objective LK-SCC-O-1: To deliver all social infrastructure (including, but not limited to, childcare and education facilities, healthcare, social, community and recreational facilities, parks and open spaces) necessary to support the growth of the Regional Centre; both in locations of new development and in existing, long-established areas where the need exists. All infrastructure development will be subject to compliance with all relevant policies and standards contained in this plan and the CDP.

Objective LK-SCC-O-2: To support the development of cultural attractions and venues at appropriate locations in Letterkenny.

14.9 Policies

Policy LK-SCC-P-1: It is a policy of the Council to require the provision of appropriately located and purpose-built early learning and childcare facilities to meet the pro-rata childcare needs of housing development during the plan period, in accordance with the standards set out in Government's 'Childcare Facilities Guidelines for Planning Authorities' or any subsequent iteration of said Guidelines.

Policy LK-SCC-P-2: It is a policy of the Council to support the principle of developing new childcare facilities to serve existing established residential and commercial areas, where there is a demonstrable need for such facilities and subject to compliance with all relevant policy provisions and standards.

Policy LK-SCC-P-3: The Council will support the continued growth and expansion of the Atlantic Technological University campus in the town centre, including the Mission and Vision set out in the University's Strategic Plan and including business development/incubation projects that are associated with the University, subject to compliance with all relevant policies and standards contained in this plan and the CDP and the following:

- (a) That any new development is of a high quality and innovative architectural design that will represent landmark buildings to identify this important site.**
- (b) That any new development located on the Port Road side of the campus will be of an appropriate density, and will provide for a Gateway entrance to the town whilst elsewhere on the site, new development will not impact negatively on residential amenities.**
- (c) That any new development makes provision for permeability, ease of access and provision of appropriate infrastructure that will support walking, cycling and public transport.**
- (d) That any new development will not give rise to unacceptable transport or environmental effects.**
- (e) That proposals to integrate relevant social infrastructure, such as childcare, will be encouraged.**

Policy LK-SCC-P-4: It is the policy of the Council to protect land of recreation and open space value in order to ensure the provision of sufficient lands and amenities for the use and enjoyment of the public.