

# **Chief Executive's Report**

on the

**Public Consultation**

regarding the

## **Proposed Variation**

to the

**County Donegal Development Plan 2018-2024  
(As Varied)**

**To Delete Letterkenny-Specific Policy Content  
(Variation No. 3)**



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

**Community Development  
& Planning Services,**

**January, 2024**



## 1.0 Introduction/Background

Statutory planning policy for Letterkenny is currently contained in Part C of the ‘County Development Plan, 2018-2024 (As Varied)’ (‘the CDP’). The CDP will remain effective until July 2024. On 13th November, 2023 the Council adopted the ‘Letterkenny Plan and Local Transport Plan, 2023-2029’. The new Plan came into effect on 3rd January, 2024. This impractical scenario of having two conflicting statutory land use plans in place at the same time was anticipated and a solution was designed to minimize the period of overlapping. The solution was to prepare a statutory variation of the CDP to delete Letterkenny-specific content, and to manage this process to allow for its adoption by Members as close as possible to the date of the new Letterkenny Plan coming into effect.

Thus on the 1<sup>st</sup> December 2023, in accordance with the provisions of Section 13 of the Planning and Development Act, 2000 (As Amended) (‘the Act’), the Authority published for consultation a Proposed Variation to the CDP in respect of the removal of the Letterkenny-specific policy content. Of note is that the Proposed Variation did not introduce any new policy.

The public consultation closed on 8<sup>th</sup> January 2024 and this Chief Executive’s Report has now been prepared, pursuant to Section 13(4) of the Act 2000, to:

- List the persons or bodies who made submissions or observations during the public consultation period.
- Provide a summary of:
  - The submissions, recommendations and observations made by the Office of the Planning Regulator,
  - The Submissions and observations made by any other persons.
- Summarize the issues raised and recommendations made by the Regional Assembly.
- Give the response of the Chief Executive to the issues raised and provide recommendations arising.

## 2.0 Summary of the Proposed Variation and Associated Documents

The Proposed Variation consists of the deletion of text from both Parts A and B, and Part C of the CDP. Specifically:

1. There are 4 proposed amendments in Part A and B.
2. There are 8 proposed amendments in Part C.

The full extent of the proposed deletions is set out in Appendix B for ease of reference.

Following Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screenings, the Planning Authority determined that neither an Environmental Report (ER) nor a Natura Impact Report (NIR) were required.

## 3.0 Public Consultation

The public consultation period commenced on 1<sup>st</sup> December 2023 and concluded on 8<sup>th</sup> January 2024. The consultation strategy included:

- Sending notices and copies of the SEA Screening report and AA Screening report to the Minister and other prescribed bodies in accordance with S.13(2) of the Act [refer to Appendix A for list of prescribed bodies].
- Publishing Newspaper Notices in local newspapers in accordance with S.13(2) and S.13(3) of the Act stating: the reasons for the Proposed Variation; the places and times at which it could be inspected; advising that hard copies of the abovementioned documents could be issued on request; inviting written or emailed submissions or observations; and advising that said submissions or observations would be taken into consideration before the making of the Variation.
- Publishing the Proposed Variation, the SEA Screening Report, and the AA Screening Report on the Council's consultation portal [consult.donegal.ie](http://consult.donegal.ie)
- Advertising the public consultation via 4 no. newspaper(s) circulating in the area and the Council's social media pages.

### **Extent of Public Participation**

**Submissions:** A total of 7 no submissions were received comprised of: 7 submissions from statutory agencies. No submissions were received from members of the public.

## **4.0 Overview of Submissions**

### **4.1 Statutory Authorities submissions.**

Seven statutory bodies made submissions:

1. DNCC-C37-1- Uisce Eireann,
2. DNCC-C37-2- The Office of the Planning Regulator (OPR),
3. DNCC-C37-3-The Northern and Western Regional Assembly,
4. DNCC-C37-4- The Health and Safety Authority,
5. DNCC -C37-5- Derry City and Strabane District Council,
6. DNCC -C37-6- Transport Infrastructure Ireland,
7. DNCC -C37-7- The Environmental Protection Agency

### **4.2 Summary of submissions.**

All submissions welcome the making of the Proposed Variation and note that it is necessary to avoid a potential conflict of policy in respect of Letterkenny. The majority of submissions note that the Proposed Variation does not propose any new policy. The OPR acknowledges the timely progression of the Proposed Variation on foot of their submission to the Draft Letterkenny Plan but makes no further recommendations or observations.

Uisce Eireann, Derry City and Strabane District Council, Transport Infrastructure Ireland and the Health and Safety Authority all note the nature of the Proposed Variation and on this basis have no further comments to make.

The EPA make a more detailed, but generic, submission that relates entirely to their role as a regulatory authority in the area of integrating environmental assessments into plans and programmes. The submission makes no specific submission on this Variation.

The Northern and Western Regional Authority note the making of the Proposed Variation and make reference to their submission on the Draft Letterkenny Plan. They

note that the Letterkenny Plan was made without the County Development Plan being brought in line with the NPF and the RSES and suggest that the variation could perhaps have been made more transparent through clarification in proposed amendment 1 at section 1.6 that in fact the Letterkenny Plan had now been adopted.

### **Chief Executive's Response**

The Statutory Authority submissions are acknowledged and the generally positive commentary is noted. The NWRA's suggested clarification re the adoption of the Letterkenny Plan is agreed and can be addressed by adding the text identified in red below to the referenced amendment item:

#### **Amendment Item 1:** (Text to be deleted shown in ~~blue strikethrough~~)


*This CDP is the first consolidated County Development Plan for the entire of County Donegal, (including the former Town Council areas of Letterkenny, Bunrana and Bundoran). It ~~therefore~~ continues the current land use and zoning frameworks in respect of ~~Letterkenny, Bunrana and Bundoran~~ and consolidates their associated written texts. A planned programme to prepare LAP's in respect of Letterkenny, Bunrana and Bundoran which is confirmed through Core Strategy Objective CS-O-15, will provide the appropriate level of assessment and detail to review and further update the planning frameworks in respect of each including ensuring the consideration of the appropriate evidential base. **A new Local Area Plan for Letterkenny, 'the Letterkenny Plan and Local Transport Plan', 2023-2029' was adopted in November, 2023.** The programmed Local Area Plans will address the identified shortfall of 1st phase residential lands in Letterkenny as well as the extent of lands zoned 'Strategic Residential Reserve' as a long term residential land bank (SRR) in each town.*

## **5.0 Recommendation**

It is recommended that Members:

- a. consider the Proposed Variation and this Chief Executive's Report; and
- b. make the Variation in accordance with Section 13(6) of the Planning and Development Act 2000 (As Amended), subject to the minor modification noted at Section 4.0 above.

Members are advised that the Variation, if made, '*shall have effect from the day that the Variation is made in accordance with Section 13(11)*' and that in the case of Letterkenny this would clear the way for the recently adopted Letterkenny Plan and Local Transport Plan to be the sole detailed statutory land use plan for the town (in tandem with the general policies of the County Development Plan).



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**John G. Mc Laughlin**  
Chief Executive  
18<sup>th</sup> January 2024

## **Appendix A: List of Prescribed Bodies consulted in accordance with section 13(2) of the Planning & Development Act, 2000 (As Amended)**

- Minister for Department of Housing, Local Government & Heritage
- An Bord Pleanála
- Minister for Department of Agriculture, Food and the Marine
- Northern & Western Regional Assembly
- Minister for Department of Defence
- Minister for Department of Education and Skills
- Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media
- Dublin Airport Authority
- Fáilte Ireland
- National Transport Authority
- An Chomhairle Éalaíon
- The Office of Public Works
- Electricity Supply Board
- Department of Environment, Climate & Communications
- Health Service Executive West
- Heritage Council
- The Health and Safety Authority
- Transport Infrastructure Ireland
- Inland Fisheries Ireland
- An Taisce
- Minister for Department of Enterprise, Trade & Employment
- Irish Aviation Authority
- Minister for Department of Transport
- Environmental Protection Agency
- Loughs Agency
- Local Community Development Committee
- Irish Water
- EirGrid
- Office of the Planning Regulator
- Derry City & Strabane District Council

## Appendix B: Schedule of Proposed Amendments

**Table 1: Proposed Part A and Part B Amendments**

Ref	Location in Plan	Type of Change	Proposed Amendment
1.	Section 1.6: 'Local Area Plan Programme'	Amend text	<p>This CDP is the first consolidated County Development Plan for the entire of County Donegal, (including the former Town Council areas of Letterkenny, Buncrana and Bundoran). It <del>therefore</del> continues the current land use and zoning frameworks in respect of <del>Letterkenny</del>, Buncrana and Bundoran and consolidates their associated written texts. A planned programme to prepare LAP's in respect of Letterkenny, Buncrana and Bundoran which is confirmed through Core Strategy Objective CS-O-15, will provide the appropriate level of assessment and detail to review and further update the planning frameworks in respect of each including ensuring the consideration of the appropriate evidential base. The programmed Local Area Plans will address the identified shortfall of 1st phase residential lands in Letterkenny as well as the extent of lands zoned 'Strategic Residential Reserve' as a long term residential land bank (SRR) in each town.</p> <p><del>The indicative timescales for the planned programme of LAPs is as follows:</del></p> <ul style="list-style-type: none"> <li><del>✦ Adoption of Local Area Plan in July 2018 in respect of An Clochán Liath, Ballybofey Stranorlar, Ballyshannon, Carndonagh, Donegal Town, Killybegs and also Bridgend.</del></li> <li><del>✦ Preparation of a draft Local Area Plan in respect of Letterkenny (target adoption of Plan Q4, 2023 publication of Draft Plan Q1, 2019).</del></li> <li><del>✦ Preparation of draft Local Area Plans in respect of Bundoran and Buncrana (target commencement 4th quarter 2018).</del></li> </ul>
2.	Section 2A.5: 'The Core Strategy Table'	Amend text	<p>Table 2A.6 provides information on the level of land zoned in this development plan across the settlement structure for the purposes of housing including mixed use. As outlined in the footnotes that accompany the table, the identified shortfall/excess in housing units that can potentially be delivered by the land zoning set out in this Plan are to be addressed through a Local Area Plan (LAP) programme. The LAP programme will deliver appropriate land supply consistent with the population targets and HLR of this Plan.</p> <p><del>through the following sequence:</del></p> <ul style="list-style-type: none"> <li><del>(i) — Adoption of a Local Area Plan in July 2018 in respect of An Clochán Liath, Ballybofey Stranorlar, Ballyshannon, Carndonagh, Donegal Town, Killybegs and also Bridgend.</del></li> <li><del>(ii) — (ii) Preparation of a Draft Local Area Plan in respect of Letterkenny (target publication of Draft Plan in Q1, 2019).</del></li> </ul>

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3.	Section 4.1.3: 'Economic Development Strategy';	Amend Text	<p><b>Availability of Land and Infrastructure</b></p> <p>As the economic driver for the County, the town of Letterkenny is an attractive location for economic development including foreign direct investment. <del>and this is provided for through the zonings and policies contained in this Development Plan. Further lands</del> Lands within the ownership of the Council and other bodies exist at a variety of locations throughout the County that could <del>also</del> potentially provide for employment generating opportunities. It is therefore considered that the supply of land is sufficient to meet demand in the short to medium term but, in recognising potential changing demands for enterprise space, the supply of land in Letterkenny and the Layer 2A Strategic Support Towns will be reviewed as part of the Local Area Plan process for these settlements.</p>																																				
4.	Section 5.1.1: 'Background'	Amend Table 5.1B	<table border="1"> <thead> <tr> <th>PROJECT</th> <th>MAP REFERENCE</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="text-align: center;"><b>TEN-T Priority Route Improvement Project, Donegal</b></td> </tr> <tr> <td>N14 Manorcunningham to Lifford / Strabane / A5 Link</td> <td>Map 5.1.4</td> </tr> <tr> <td>N15/N13 Ballybofey / Stranorlar Urban Region</td> <td>Map 5.1.5</td> </tr> <tr> <td>N56/N13 Letterkenny to Manorcunningham</td> <td>Map 5.1.6</td> </tr> <tr> <td colspan="2" style="text-align: center;"><b>NATIONAL</b></td> </tr> <tr> <td>N15 Lifford to Ballybofey/Stranorlar</td> <td>Map 5.1.7</td> </tr> <tr> <td>N56 Mountcharles to Inver</td> <td>Map 5.1.8</td> </tr> <tr> <td>N56 Inver to Killybegs</td> <td>Map 5.1.10</td> </tr> <tr> <td>N56 An Clochan Liath (Dungloe) to Glenties</td> <td>Map 5.1.9</td> </tr> <tr> <td>N14/N15 to A5 link (or as may be amended or incorporated, with or without amendment or modification, within the TEN-T developments).</td> <td>(Not Mapped)</td> </tr> <tr> <td colspan="2" style="text-align: center;"><b>OTHER</b></td> </tr> <tr> <td>Buncrana Inner and Outer Relief Road</td> <td>Map 5.1.11</td> </tr> <tr> <td>Muff Bypass</td> <td>Map 5.1.12</td> </tr> <tr> <td>Ballybofey Link Road</td> <td>Map 15.2</td> </tr> <tr> <td>Burnfoot Bypass</td> <td>Map 15.25</td> </tr> <tr> <td>Killybegs Outer Relief Road</td> <td>Map 15.6</td> </tr> <tr> <td colspan="2" style="text-align: center;"><b>LETTERKENNY STRATEGIC NETWORK</b></td> </tr> </tbody> </table>	PROJECT	MAP REFERENCE	<b>TEN-T Priority Route Improvement Project, Donegal</b>		N14 Manorcunningham to Lifford / Strabane / A5 Link	Map 5.1.4	N15/N13 Ballybofey / Stranorlar Urban Region	Map 5.1.5	N56/N13 Letterkenny to Manorcunningham	Map 5.1.6	<b>NATIONAL</b>		N15 Lifford to Ballybofey/Stranorlar	Map 5.1.7	N56 Mountcharles to Inver	Map 5.1.8	N56 Inver to Killybegs	Map 5.1.10	N56 An Clochan Liath (Dungloe) to Glenties	Map 5.1.9	N14/N15 to A5 link (or as may be amended or incorporated, with or without amendment or modification, within the TEN-T developments).	(Not Mapped)	<b>OTHER</b>		Buncrana Inner and Outer Relief Road	Map 5.1.11	Muff Bypass	Map 5.1.12	Ballybofey Link Road	Map 15.2	Burnfoot Bypass	Map 15.25	Killybegs Outer Relief Road	Map 15.6	<b>LETTERKENNY STRATEGIC NETWORK</b>	
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			<p>Northern Strategic Relief Corridor Northern Network Project</p> <p>Map 12.1B &amp; 12.3 (Not mapped)</p>
			<p>Western Strategic Relief Corridor Western Network Project</p> <p>Map 12.1B &amp; 12.3 (Not mapped)</p>
			<p>Southern Strategic Relief Corridor Southern Network Project</p> <p>Map 12.1B &amp; 12.3 (Not mapped)</p>
			<p>Eastern Strategic Relief Corridor</p> <p>Map 12.1B &amp; 12.3</p>

**Table 2: Proposed Part C Amendments:**

Delete all Letterkenny-specific content contained in Part C as set out below:			
1	Standalone page immediately inside front cover of Part C	Amend 'Important Note'.	<p><b>Important Notes</b> <b>Note # 1</b> <b>County Donegal Development Plan 2018-2024 (As Varied).</b></p> <p>The County Donegal Development Plan 2018-2024 (as Varied) incorporates the Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal (Variation No. 1) made by the Elected Members of Donegal County Council on the 31st of May 2021. Textual insertions made by said variation are shown in blue whilst textual deletions made by said variation are show in red strikethrough.</p> <p>In addition the following maps form part of the abovementioned variation and are contained within Part C of the Development Plan: <a href="#">Map 12.1B</a>, <a href="#">Map 12.3</a>, Map 15.2, and Map 15.17. These maps are, in effect, amended versions of the original maps published as part of the original County Development Plan in June 2018. In the interests of clarity any amendments to said maps as result of said Variation are not labelled on said maps. However the original versions of the abovementioned maps are available to view on the Council's website at: <a href="https://www.donegalcoco.ie/services/planning/planningpolicy">https://www.donegalcoco.ie/services/planning/planningpolicy</a></p>
2	Table of Contents, page i.	Delete section of Table	Delete all refs. to 'Chapter 12 Letterkenny' from '12.1: Introduction' to '12.11.2: Childcare Strategy Policy Specific To Letterkenny'.
3	List of Figures, p.iii.	Delete ref. to Letterkenny	Delete row referring to Figure 12.1: 'The Areas In Letterkenny Designated Areas for Significant Development'
4	List of Table, p.iv.	Delete refs. to Letterkenny	Delete rows referring to: ~ Table 12.1: The Core Strategy Table In Relation to Letterkenny; and Table 12.2: Zoning objectives in relation to Letterkenny

5	'Introduction', p.1.	Amend text	<p>In turn this section of the Plan (Part C) also aims to give effect to the strategic plan in Part A by:</p> <p>(1) Setting out <b>detailed policy frameworks and associated land use zoning maps for the towns of Letterkenny, Buncrana and Bundoran</b> in Chapters <del>12</del>, 13 and 14 respectively. These towns were previously subject to their own individual Development Plans, and it is envisaged that these policy frameworks and land use zoning maps will in turn be superseded in due course by Local Area Plans.</p>
6	'Chapter 12 Letterkenny', pages 2- 43, + Maps 12.1A, 12.1B, 12.2 and 12.3	Delete text and maps	Delete entire Chapter.
7	'Chapter 15 Settlement Frameworks, Introduction', p.93	Amend text	<p>The Settlement Frameworks are not designed to be exhaustive in the presentation of all the relevant matters that may be considered in the determining of a planning application, as further issues may evolve over time or may be pertinent in certain site-specific cases. Policy frameworks and land zoning maps for the towns of <del>Letterkenny</del>, Buncrana and Bundoran (which supersede the Development Plans for these towns) have been set out in Chapters <del>12</del>, 13 and 14 of this part of the Plan.</p>
8	'Chapter 15 Settlement Frameworks, Land Use Zoning Objectives', p.95	Amend text	<p>The zoning objectives set out in Table 15.2 relate to land zoned in the settlement frameworks and should be read in conjunction with the wider policies contained in Part B of this Development Plan. Relevant land use zoning objectives in respect of <del>Letterkenny</del>, Buncrana and Bundoran are contained in the relevant chapters of this part of the Plan. On zoned lands within the Settlement Frameworks, applications may be granted where the Planning Authority considers that the proposed use or development would comply with the zoning objective of the area and would otherwise comply with the policies of the Plan and would be in accordance with the proper planning and sustainable development of the area.</p>