



Chief Executive's Report

on the

Submissions Received

during the

Public Consultation

on the

Draft County Donegal

Development Plan

2024-2030

January 2024

Community Development and
Planning Services Directorate



Comhairle Contae
Dhún na nGall
Donegal County Council

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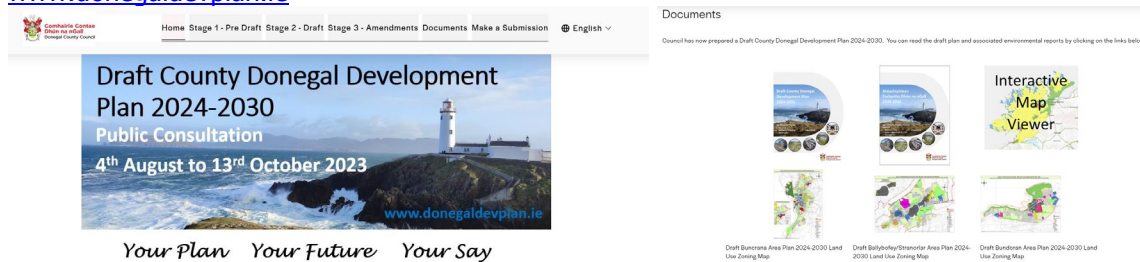
Section 1: Introduction

1.1 Background to the Report and Public Consultation on the Draft Plan

Between the 4th of August and 13th October, 2023 the Council published the Draft County Donegal Development Plan 2024-2030 incorporating Town Plans for Ballybofey/Stranorlar, Bunrana and Bundoran and the associated Environmental Report, Natura Impact Report, Strategic Flood Risk Assessment Report, and Strategic Water Status Impact Assessment Report for public consultation in accordance with Section 12 of the Planning and Development Act 2000(as amended).

The Council engaged in a wide range of public consultation on the Draft Plan including:

- Publishing a statutory notice in newspapers advising of where the plan could be inspected and inviting written submissions on the Draft Plan and above environmental reports via, email, and post in accordance with S.12(b) of the above Act.
- Publishing the Draft Plan and above reports on the Council's dedicated development plan website www.donegaldevplan.ie



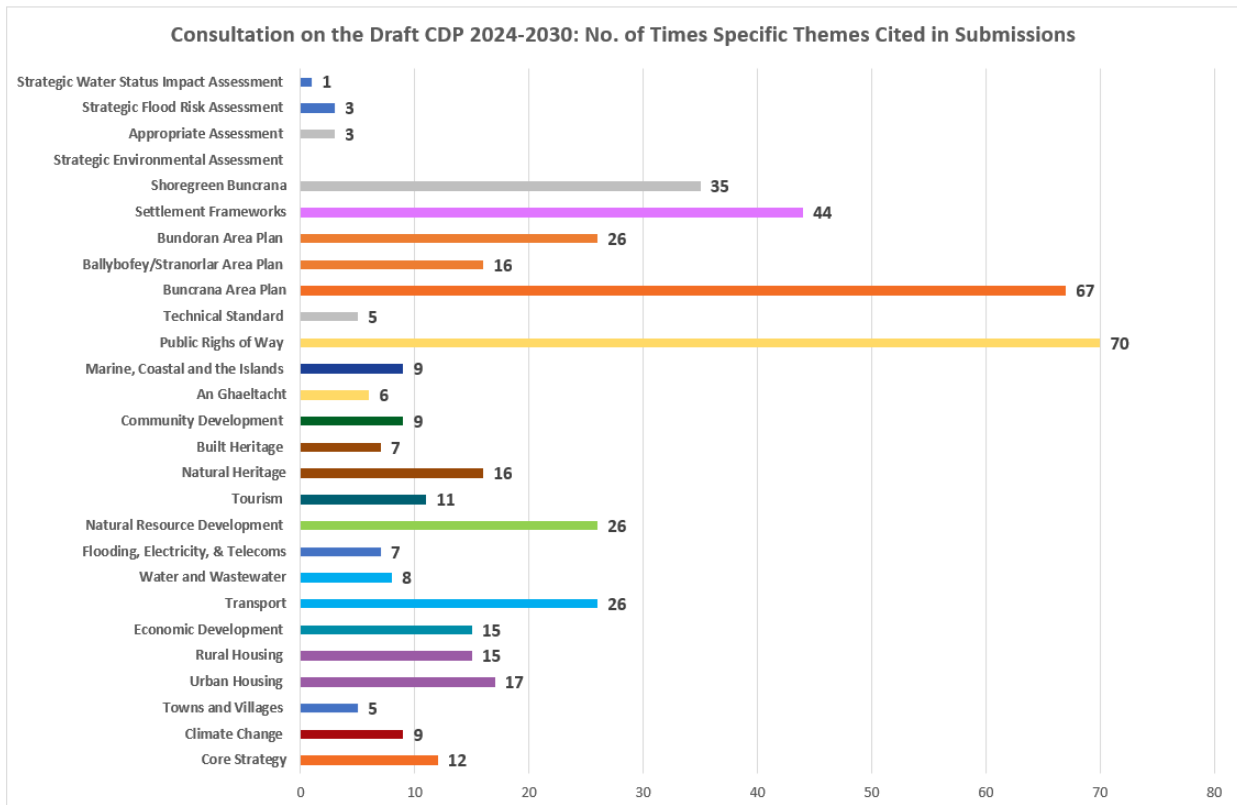
- Making physical copies of the plan available at the Council's Offices and in public libraries.
- Forwarding copies of the Draft Plan and above associated report to inter alia the Minister for Housing, the Office of the Planning Regulator, An Bord Pleanala, the Northern and Western Regional Assembly and other prescribed authorities.
- Advertising the publication of the Draft Plan via the Council's social media pages.
- Holding Drop in Public Consultation Events to allow interested parties to view and discuss the contents of the Draft Plan at the following locations/times. These drop-in events were also advertised in the press, radio and on social media.

Location:	Date/Time:	Venue:
Lifford	Monday 4 th September	The Old Court House,
Letterkenny	Tuesday 5 th September	Letterkenny Public Service Centre,
Carndonagh	Wednesday 6 th September	Carndonagh Public Service Centre,
Ballybofey/Stranorlar	Thursday 7 th September	The Base Enterprise Centre,
Gaoth Dobhair/Gweedore	Monday 11 th September	Ionad Naomh Phadraig
Donegal Town	Tuesday 12 th September	Donegal Town, Public Service Centre
Milford	Wednesday 13 th September	Milford Public Service Centre
Bunrana	Thursday 14 th September	Inishowen Gateway Hotel
Bundoran	Monday 18 th September	Bundoran Community Centre,
Dungloe	Tuesday 19 th September	Dungloe Public Service Centre,
Glenties	Wednesday 20 th September	Highlands Hotel,

- Holding student information and feedback sessions with the following schools following an invitation to all secondary schools in the county. These included a presentation by the forward planning team and a group-based feedback session where students provided feedback on landscape, climate change, wind energy, and sustainable mobility issues. The issues raised by the students are summarised and responded to in the relevant sections of this report. The feedback from the students on these issues was highly insightful, very well informed, and constructive. The Council expresses its thanks to the students and schools involved and is delighted that Donegal’s future rests in such capable hands.
 - St Eunan’s College, Letterkenny.
 - St Columba’s Collage, Stranorlar.
 - Crana College, Buncrana.
 - Rosses Community School, An Clochán Liath.
 - Coláiste Ailigh, Leitir Ceanainn.
 - Deelee College, Raphoe.



During the public consultation a total of 281 written submissions were received on a wide range of development plan issues. The graph below provides a broad overview of the number of times various issues were cited in submissions and highlights the most prevalent issues. A list of the persons/bodies who made submissions together with their reference is contained in Appendix B of this report. The Council would like to thank all those who took the time to make written submissions on the Draft Plan. These submissions can be viewed at: <https://consult.donegal.ie/en/node/419/submissions>.



1.2 Purpose And Content of The Chief Executive’s Report

The Chief Executive (CE) of the Council is required to prepare a report on the submissions and observations received during the public consultation period in respect of the Draft County Donegal Development Plan 2024-2030 in accordance with Section 12(4)(a) of the Planning and Development Act 2000 (as amended).

In summary the Chief Executive’s (CE) report is required [Section 12(4)(b), (ba) and (bc)] of the Act refers) to:

- List the persons or bodies who made submissions or observations.
- Summarise the issues raised by the persons or bodies in their submissions or observations.
- Provide a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator.
- Provide a summary of the issues raised and recommendations made by the Regional Assembly.
- Give the response of the Chief Executive in relation to the issues raised, taking account of any directions of the members of the authority, the proper planning and sustainable development of the area, the statutory obligations of the local authority and any relevant policies or objectives of the Government or of any Minister of the Government.

This CE report will be published on www.donegaldevplan.ie as soon as practicable following its submission to the Elected Members in accordance with Section 12(4)(aa) of the above Act.

The Elected Members of the Planning Authority are required to consider the Draft Plan and the CE Report within 12 weeks of its submission in accordance with Section 12(5)(a) and (b) of said Act prior to accepting or amending the Draft Plan by resolution.

1.3 Format of Report

In the interests of legibility and functionality this report groups the issues raised and the Chief Executive’s responses/recommendations to them into sections corresponding to the respective chapters in the Draft Plan in the order they appear in the Draft Plan (as recommended in the Publication Development Plans: Guidelines for Planning Authorities (DoHLGH June 2022)). Consequently, the issues raised in a particular submission may be summarised and responded to within several sections.

The recommendations, submissions and observations made by the Office of the Planning Regulator with respect to specific issues are also summarised and responded to at the start of the corresponding sections of this report (e.g. Core Strategy, Housing etc)

Appendix B of this report contains a complete list of all persons/bodies who made submissions. Furthermore, a list of all persons and bodies who made submissions in relation to particular issues (e.g. housing, public rights of way etc) is also listed at the start of each respective section.

The Report addresses, inter alia, key issues raised by Members in previous sessions. These issues include:

- rural housing (refer Section 6.3);
- small businesses in the rural area and on the edge of settlements (refer Section 7.2); and
- national road access policy (refer Section 8.1).

1.4 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is a process to process for the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme. A SEA of a Draft Development Plan is a mandatory requirement pursuant to Article 13C of the Planning and Development Regulations 2001(as amended). Accordingly, an Environmental Report which inter alia identifies, describes, and evaluates the likely significant effects

on the environment of implementing the Draft Plan was prepared and published for public consultation along with the Draft Development Plan 2024-2030.

1.5 Appropriate Assessment

An Appropriate Assessment (AA) is an assessment of the potential adverse effects of a plan or project (in combination with other plans or projects) on Special Areas of Conservation and Special Protection Areas. These sites are protected by National and European Law. The obligation to undertake Appropriate Assessment derives from the EU Habitats and Bird Directive and involves number of sequential steps and tests including screening, scoping and the preparation of a Natura Impact Report. A Natura Impact Report of the Draft Plan was prepared by AECOM Ireland Limited. This report informed the preparation of, and was published alongside, the Draft Plan.

1.6 Stage 2 Strategic Flood Risk Assessment

A Stage 2 Strategic Flood Risk Assessment (SFRA) of the Draft Plan was prepared by Roughan O'Donovan Consulting Engineers in accordance the publication *The Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG 2009)*. This report informed the preparation of, and was published alongside, the Draft Plan.

1.7 Strategic Water Status Impact Assessment

Strategic Water Status Impact Assessment (SWSIA) assesses whether a plan will cause deterioration of the status of any water body or jeopardise it attaining or maintaining at least good status in compliance with the objectives of the Water Framework Directive (WFD). A SWSIA Report of the Draft Plan was prepared by Ove Arup & Partners Ireland Limited in accordance with the Draft *Guidance for the Incorporation of the Water Framework Directive into the Planning System*. This report informed the preparation of, and was published alongside, the Draft Plan.

1.8 Other Issues Arising

It should be noted that a number of issues have been identified through consultations between different sections of the Council, outside of being raised through any of the public submissions, or submissions received from the Prescribed Bodies/Environmental Authorities. These issues are also addressed in the relevant sections of this report as and where necessary.

1.9 Next Steps

The Elected Members of the Planning Authority are now required to consider the Draft Plan and the CE Report within 12 weeks of its submission in accordance with Section 12(5)(a) and (b) of the Planning and Development Act 2000(as amended).

To facilitate this consideration a **Plenary Workshop** has been scheduled for **Thursday 11th January 2024** and a **Special plenary meeting** has been scheduled for **Tuesday 6th February 2024**. At the said meeting it is hoped that the members may be in position to agree any Proposed Material Alterations (PMAs) to the Draft Plan.

In turn this will enable the Planning Authority to:

- Determine whether Strategic Environment Assessment (SEA) or Appropriate Assessment (AA) are required in respect of these Proposed Material Alterations.
- Prepare, as necessary, a revised Environmental Report, Natura Impact Report, Strategic Flood Risk Assessment Report and Strategic Water Status Impact Status Assessment Report on any such Proposed Material Alterations and to submit said revised reports to the Members for their consideration prior to the Members resolving approving to publish the Proposed Material Alterations.

A **Special Plenary Meeting** has been scheduled for **Wednesday 21st February 2024** to facilitate the consideration of the above revised environmental reports on any Proposed Material Alterations and to allow members to amend the Draft Plan by resolution in accordance with Section 12(6) of the Act.

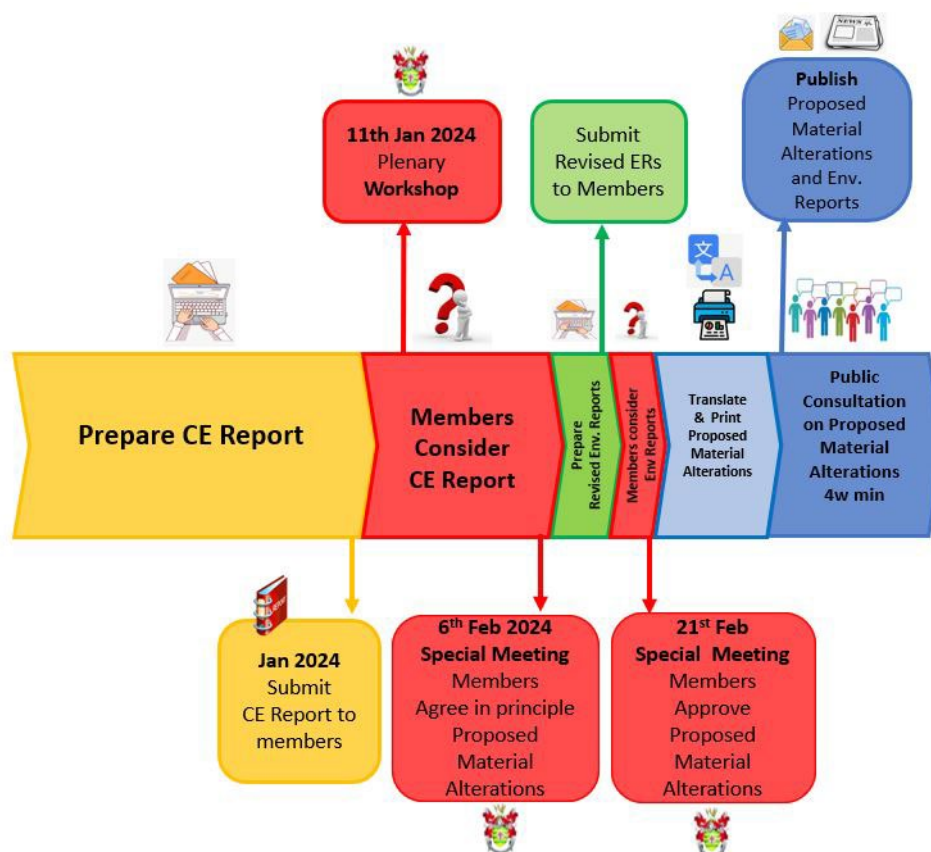
The Planning Authority would then be required to publish the Proposed Material Alterations and the associated abovementioned revised reports and any SEA/AA determinations for public consultation for a minimum of 4 weeks and to send notice and copies of the PMAs to the Minister, the Office of the Planning Regulator, the Board and the Prescribed bodies in accordance with Section 12(7) of the Act.

Furthermore where a planning authority, after considering a submission, observation or recommendation from the Office of the Planning Regulator or the Regional Assembly, decides not to comply with said recommendations it is required to inform the OPR and/or the Assembly as soon as practicable by notice in writing and the notice shall contain reasons for the decision in accordance with Section 12(5)(aa) of said Act.

Following any public consultation on the Proposed Material Alterations a further CE Report will be prepared and submitted to the Members on any submissions or observations received during said consultation.


Finally, Members are referred to Section 12(11) of the Act wherein it is provided that:

'In making the development plan, the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.'



1.10 Recommendation of the Chief Executive

- a. Pursuant to Section 12(6) of the Planning & Development Act, 2000 (As Amended), it is recommended that the Members **amend** the Draft County Donegal Development Plan 2024-2030 in accordance with the specific Chief Executive's Recommendations contained within the various sections of this report (including those considered to be Material Alterations of the Draft Plan).
- b. Authorise the Executive to proceed with the consequent environmental assessment requirements as set out above.



John G. McLaughlin
Chief Executive
Donegal County Council

Section 2: Vision and Ambition

NWRA DCDP-262
Advises that the vision 'would benefit from setting out how DCC intends to amplify/deliver upon the stated vision, and what mechanisms are in place, or will be put in train to foster enhanced economic/educational/local government activity (through action plans or other levers).'
<p>Chief Executive's Response:</p> <p>Agreed.</p>
<p>Chief Executive's Recommendation 2.1:</p> <p>1) Insert additional narrative in Sections 2.1 and 2.2 setting out how the Council intends to deliver on the stated vision, envisaged mechanisms etc. (existing text in black; new text in blue)</p> <p>The ambition of Donegal County Council is to grow the population of the County to upwards of 200,000 people by 2040. This ambition is framed in the context of the recognition in the NPF and the RSES of the critical role the north-west of the island of Ireland has to play in achieving balanced regional growth. Central to this ambition is a commitment to work towards the delivery of a climate resilient, healthy, culturally inclusive, connected, innovative and economically vibrant place that ensures an excellent quality of life for all of Donegal's citizens. Two overarching <u>key</u> strategies are identified as being key drivers of such growth.</p> <p>2) The emerging strategic issues which provide a context for the concept of a cross-border spatial strategy in terms of a vibrant, innovative, green and creative region. The overarching strategic issues emerging are:</p> <ul style="list-style-type: none"> • The need to develop a collaborative, place-based strategy with a shared vision, that is based on principle of place making, smart growth & healthy places; • Potential for climate adaptation solutions to act as instigators for positive change; • Ensuring a strong focus on economic development and regional planning - identity, place and potential; • Establishing the City Region as a polycentric model promoting sustainable growth; • Agreeing a meaningful joint strategy with an emphasis on mobilising assets through a regional perspective on growth and competitiveness - centred on outcomes; and • Setting out a whole of City-Region stock take of assets. <p>These strategic issues are the basis for setting out the pointers, principles and recommendations relevant to any future metropolitan spatial strategy where it can prove a worthwhile example of territorial cooperation to further build functionality across spatial borders. In this context the Strategic Issues focus on:</p> <p>(i) The Settlement Structure – The urban structures recognises the settlements that require consolidation and where account is taken of the functionality, assets and needs of the rural hinterlands. Rural development considerations are integral to this strategic approach. The implications for the NWCR include placing a focus on Urban-Rural structures to ensure that all settlements contribute to the overall sustainable development of the City Region. The structure of the proposed metropolitan area is border-blind and inter-jurisdictional approaches are required to address the issues faced by the NWCR. Central to this is the aim to provide a co-decision making context with citizens and other stakeholders to enable the planning services to be visionary and proactive.</p> <p>(ii) The Economy – As one of the three pillars of regional growth guiding the collaborative activities of the North West Strategic Growth Partnership (NWSGP), the spatial strategy seeks to support a vision and the principles on which the region's economy needs to be supported. A wholly integrated approach to economic planning which gives expression to</p>

the best practice principles of place making and strong regions, while also going beyond a policy template which stops at the border, is required for the NWCR to tackle the negative impacts of its historical infrastructure baseline deficit, and deliver a just transition which addresses the acute economic and social inequalities experienced in the region's economy. Existing cross border collaborative working and networking arrangements between key council staff and stakeholders already focuses across a range of sectors, including economic development, spatial planning, climate action, transport, education, health and tourism. In recognising the importance of existing collaborations, it will be essential that there is connectivity between these strands of work through a spatially-led approach to deliver the effective and sustainable development of the City Region. The paucity of comparable datasets for both jurisdictions is a barrier to evidence-based economic planning, and spatial planning more generally and consequently is a key issue for the development of the spatial strategy.

- (iii) **Mobility & Accessibility** - Mobility is a key determinant of economic prosperity, environmental quality, quality of life and the level of community interaction that can take place. Within the existing NW structures there is a shared commitment to continue to strengthen external transport linkages at the regional scale and central to this is recognition that future transport networks must reflect the polycentric nature of the region's settlement pattern and increase connectivity among the cities, towns and villages and that inter-jurisdictional collaboration is required to deliver services and a meaningful modal shift in transport. Diversifying the modal choice is integral to regional competitiveness and to ensuring that transport planning is linked to housing, employment, education, health and leisure provision.
- (iv) **Environment** – Climate change will impact on land-use and on demands on natural resources into the future. Achieving climate neutrality and green transformation requires place-based leadership, drawing on the potential of spatial strategy-making processes to act as instigators of change rather than simply regulators of development. A key consideration for the spatial strategy is the preparation of a common framework for spatial and environmental planning setting a context for a joint landscape character assessment, flood risk management, adaptive design approaches to development, increase awareness of the potential of the sea as a source of renewable energy, and sustainable governance of maritime resources in the context of new legislation.
- (v.) **Community Wellbeing** – There is an identified role for local authorities in determining and influencing the health outcomes of local communities. This underpins the clear relationship between approaches to effective community wellbeing and spatial planning through activated relationships, working processes and models of implementation and accountability. The COVID-19 pandemic has emphasised for everyone the relevance of spatial planning and population health outcomes. The pandemic created space for innovation in policy and service delivery that responded to health needs and emphasised the interdependencies between economic, social and physical/environmental factors in the North West.

Ultimately there is a need for a just transition in spatial planning terms that reflect the extent to which a cross border spatial planning framework takes account of, activates and mobilises the necessary joined-up working required to ensure an effective and sustainable future .

(These are considered to be non-material.)

Failte Ireland DCDP-189

Recommends an additional objective given the economic importance of tourism for the County.

Chief Executive's Response:

Agreed.

Chief Executive's Recommendation 2.2:

Insert additional Key Strategic Objective in Section 2.4:

'S-O-8-To retain, promote, and drive Donegal's position as a premier domestic and international tourism destination, with a focus on developing green and sustainable tourism'.

(This is considered to be a material alteration.)

Section 3: Core Strategy

Office of the Planning Regulator

The OPR makes 9 recommendations in relation to the Core Strategy. This section of the Report addresses 4 of the recommendations ie. OPR recommendation reference nos. 1, 2, 4, and 8. Recommendations 3, 5, 6, 7 and 9 all specifically address one or more of Buncrana, Ballybodey/Stranorlar and/or Bundoran and are therefore addressed in the Sections 17-20 of this Report dealing with those towns.

OPR DCDP-211 (re Letterkenny)
<p>OPR Rec 1 requires a greater focus in the Core Strategy on the status, function and role of Letterkenny:</p> <p>the planning authority is required to amend the proposed written statement to:</p> <ul style="list-style-type: none"> i) include a standalone chapter or substantial section addressing the future planning of the Letterkenny Regional Growth Area as a distinct spatial planning unit, including having regard to its role within the wider North West Metropolitan City Region, and to draw together the relevant development issues and policy responses relating to the Regional Growth Centre area; and ii) give appropriate prominence to the Regional Growth Centre in other parts of the draft Plan, including the economic development strategy and present it clearly in relevant maps, such as the core strategy and settlement strategy maps.
<p>Chief Executive's Response:</p> <p>Donegal County Council has long recognised the role and importance of Letterkenny to the growth and development of the entire County and the wider Northwest Region. Donegal has worked closely with Derry/Strabane to develop and improve the Northwest City Region as a combined place with Letterkenny at its core on the Donegal side. The Draft Plan already addresses the key regional growth centre role of Letterkenny including, inter alia, at: Section 2.2 'North-West City Region; Section 3.3.1 'Letterkenny Regional Growth Centre'; Core Strategy Objective CS-O-1; and Economic Development Objective ED-O-1. Notwithstanding this, a standalone section will be added in the Plan.</p>
<p>Chief Executive's Recommendation 3.1:</p> <p>Insert new narrative to strengthen the coverage of Letterkenny and its status as a Regional Growth Centre.</p> <p>(This is considered to be non-material and will be submitted to Members at a future meeting).</p>

OPR DCDP-211 (Re re-distribution of Core Strategy Growth Targets)

OPR Rec 2 requires a re-distribution of the Core Strategy's projected population and housing growth targets. The Office does so by firstly acknowledging that:

- the total county population projections for the plan period are consistent with the population prescribed for the county in the NWRA RSES and the Implementation Roadmap for the NPF (2018);
- this Authority's determination of the housing supply target is in accordance with the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020); and
- the components of the Core Strategy Settlement Hierarchy are accepted.

The Office, however, is not satisfied regarding the scale of the projected population and housing growth allocations to the different layers. More specifically, it is not satisfied with:

- a. The allocation to Letterkenny in the context of its designation as a Regional Growth Centre in the NPF and RSES (and thus the national and regional strategy of seeking to '*build up stronger regions with centres of scale that are more accessible and competitive*');
- b. The allocation to 'middle tier settlements'. The office cites that '*there is potential for middle tier settlements with services capacity to accommodate a greater level of growth, generally. In addition, the growth allocation to the largest settlements of Buncrana, in particular, and Ballybofey/Stranorlar, should reflect their scale and role consistent with NPO 18b and NPO 33.*'
- c. The allocation of 25% of growth to the open countryside, citing that: '*it is not necessary in order to arrest decline and encourage growth of the open countryside; rather, it will undermine the growth of the network of rural villages and towns that provide essential services to support rural areas across the county.*' The Office continues by advising that: '*The provision of additional extensive one-off housing on unserviced lands is in conflict with NPO 52, which seeks to ensure that development occurs within environmental limits, and with NPO 54, which seeks to reduce our carbon footprint, in addition to the requirement under section 10(2)(n) of the Act to promote sustainable settlement and transport strategies for urban and rural areas to reduce greenhouse gas (GHG) emissions. In this regard the Strategic Environmental Assessment (SEA) Environmental Report has identified likely negative effects on biodiversity, flora and fauna, water, air, climate factors and on the landscape from housing in structurally weak areas facilitated under policy RH-P-3.*'

In the above context, OPR Recommendation 2 requires as follows:

the planning authority is required to revise the allocation of housing supply target distribution for the county across the settlement hierarchy to:

- (i) increase the housing target for Letterkenny commensurate with its designated regional role;
- (ii) increase the housing target for Buncrana and Ballybofey / Stranorlar, commensurate with their relative scale;
- (iii) increase the housing target for the County Growth Drivers / Self-Sustaining Growth Towns and Service Towns, proportionate to their size;
- (iv) increase the housing target for the Rural Areas (Settlements);

subject to infrastructural capacity availability; and

- (v) decrease the housing target for the Open Countryside commensurate with the increased allocation to the other settlements and amend objective CS-O-3 accordingly.

Chief Executive's Response:

Letterkenny

Proposed Material Alteration 1 ('the PMA') in respect of the Draft Letterkenny Plan and Local Transport Plan, 2023-2029 addressed in detail the issue of the identification of a population and housing growth target for Letterkenny to align with the NPF and RSES. Thus, it provided for:

- a population growth of 5720 persons over the 2016 baseline by 2029 (the equivalent figure in the Draft Plan was 9881 persons by 2031);
- a revised housing supply target of approximately 2300 units by 2029 taking into account the provisions of the NPF and RSES; the need to provide for future growth in Letterkenny; and the need to account for recent under-supply.
- a revised housing land supply of a minimum of 57 hectares.

The full text of the PMA is attached to this Report as Appendix A. Of note is that in its submission on the Letterkenny Plan PMA's, the OPR advised that it was generally satisfied that PMA1 responds to the requirements of the relevant recommendation in its submission on that Plan and that the housing target and associated population yield would be consistent with the RSES.

As the Core Strategy table for Letterkenny in the Draft Plan is consistent with population and housing projections for the town as contained in the adopted Letterkenny Plan, the recommendation below does not include any proposed amendments for Letterkenny.

County Growth Drivers, Service Towns, Rural Settlements and Open Countryside

The Core Strategy currently distributes the targeted growth across the different layers of the settlement hierarchy as follows:

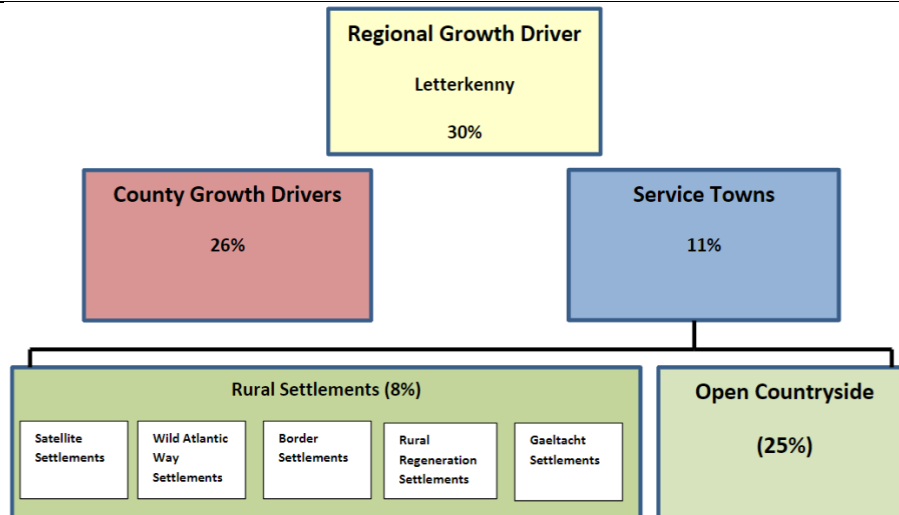


Figure 3.2 – Distribution of Projected Population Growth

The OPR has recommended a reduction in the allocation to the Open Countryside, and an increase to the County Growth Drivers and Service Towns. While it is difficult to define precise percentages at this level, a reasonable approach may be to reduce the Open Countryside allocation by 5% and re-distribute this to County Growth Drivers (3%) and Service Towns (2%).

In terms of the County Growth Drivers the OPR specifically references Buncrana and Ballyshannon. Equally splitting the additional 3% across these two towns would see the allocation of an additional 115 units to each (3% of 7678 total units County-wide = 230.34). At a density of 35 units/hectare, this would result in the requirement for an additional 3.29 hectares for each town.

The 7 settlements included in the Services Towns layer are identified in the table below, together with their respective recorded populations in the 2022 Census:

Ballyshannon	2246
Bunbeg/Derrybeg	1543
Bundoran	2599
Carndonagh	2768
Lifford	1613
Milford	1037
Raphoe	1089

Having regard to the scales of Ballyshannon, Bundoran and Carndonagh relative to the others, a reasonable approach would be to allocate the proposed additional 2% across these three settlements. Equally splitting the additional 2% across these three towns would see the allocation of an additional 52 units to each (2% of 7678 total units County-wide = 153). At a density of 25 units/hectare (as suggested/recommended by the OPR), this would result in the requirement for an additional 2.08 hectares for each town.

Chief Executive's Recommendation 3.2:

- 1) Not to amend the Core Strategy in respect of Letterkenny having regard to the detailed housing target work prepared for Letterkenny as part of the Letterkenny Plan and Local Transport Plan process and the demonstration therein of alignment with RSES targets, which work was developed in tandem with the emerging Core Strategy for the Draft CDP, and to the OPR's general satisfaction with that work.
- 2) To re-distribute the Core Strategy targeted population and housing growth projections as follows:
 - (i.) allocate an additional 3% to the County Growth Drivers layer, and further allocate this equally between Buncrana and Ballybofey/Stranorlar (this would result in an additional 115 units/3.29 hectares for each town.
 - (ii.) allocate an additional 2% to the Service Towns layer, and further allocate this equally between Ballyshannon, Bundoran and Carndonagh (this would result in an additional 52 units/2.08 hectares for each town.
 - (iii.) Reduce the allocation for the Open Countryside from 25% to 20%.
 - (iv.) Revise all narrative, associated tables and images accordingly.

(This is a considered to be a material alteration).

OPR DCDP-211 (Re more detail around rural settlements and open countryside; and density assumptions for smaller settlement)

The OPR's rec. 4 is in three parts (the third part is addressed in the next sub-section of this Report).

- (i) to include details in the core strategy table of baseline Census population, percentage share of baseline census population and percentage share of housing target separately for (i) Rural (Settlements) and (ii) for the open countryside outside Rural (Settlements);
- (ii) by reducing the density assumptions applied in the core strategy table in determining zoned land required for the County Growth Towns / Self-Sustaining Growth Towns, excluding Buncrana, Ballybofey / Stranorlar, and to Service Towns to better reflect the density range recommended in the

Sustainable Residential Development guidelines. A mid-point in the recommended range would be appropriate; and

In terms of Part (i.), the OPR advises that: *'It is important that the planning of rural areas, including small rural settlements and the open countryside, are informed by the same level of detailed analysis and consideration as is applied for urban areas area. This will enable the planning authority to better understand the trends and pressures affecting rural areas in order to address same by appropriate policy choices.'* In this context, the OPR advises that: *'Having regard to the standardised core strategy methodology under the DHLGH's Development Plans Guidelines (Appendix A, s.1.3.3, in particular, refers), in accordance with NPO 71, the additional required details include baseline census population, percentage share of baseline population, population target for the end of the plan period and percentage share of housing target.'*

Regarding Part (ii.), the OPR refers to *'the recommended residential density range of between 15-35 units per hectare for small towns and villages of between 400-5000 population in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns &*

Villages (2009), (and thus that) a lower gross density would be appropriate for the smaller County Growth Drivers / Self-Sustaining Growth Towns, and for the Service Towns.'

Chief Executive's Response:

Both Parts (i.) and (ii.) of the OPR's recommendation is accepted and are addressed in the recommendation below.

Chief Executive's Recommendation 3.3:

Amend Table 3.5 Core Strategy as follows:

- a. By amending/adding further detail to the last 2 rows dealing with Rural Areas (Settlements) and Open Countryside as below:

- (i.) Omit the existing content (reproduced immediately below):

Rural Areas (Settlements): (~8%) ~610 units
Open Countryside: (25%) ~1920 units

- (ii.) Insert the following content:

Population and Housing					
Rural Area (Settlements)					
	Census 2022 Population	Census 2022 (% of overall County)	Population Target 2030	Housing Target (Units)	Housing Target (%)
	27,875	16.7	Census 2022 + 1586	610	8
Rural Areas (Open Countryside)					
	86,023	51.5	Census 2022 + 4095	1535	20%

- b. By amending the 'Target Residential Density' column from 35 units per hectare to 25 units per hectare for Killybegs, An Clochan Liath, Carndonagh, and Ballyshannon.

(This is considered to be a material alteration)

OPR DCDP-211 (re Bunbeg/Derrybeg; Milford, Raphoe and Lifford)

Recommendation 8 provides that:

the planning authority is required to consider including residential land use zoning objectives, or other appropriate mechanisms, to direct the sustainable development of residential development in the towns of Bunbeg-Derrybeg, Milford, Lifford and Raphoe.

Also, OPR rec. 4(iii.) requires the inclusion of Raphoe, Bunbeg-Derrybeg and Milford on the Core Strategy Diagrammatic Map. The OPR advises that although it: 'notes the core strategy diagrammatic map (map.3.2) in the draft Plan ... is clear and easy to distinguish due to its good design ... the map does not include the(se) Service Towns.

Chief Executive's Response:

Policy for guiding the development of towns in a sequential manner outwards from the core area is already provided for all towns in Core Strategy Policy CS-P-2. Notwithstanding, the OPR has

advised that, given the inclusion in the Core Strategy table of the referenced settlements together with the fact that there are no plans to prepare zoning plans for them, it would be prudent to include specific policy underlining the requirement to adhere to the sequential development approach. This is agreed.

The addition of Raphoe, Bunbeg-Derrybeg and Milford to the Core Strategy diagrammatic map is also agreed (nb. these settlements are already on the map but not identified with a label).

Chief Executive's Recommendation 3.4:

- 1) Insert additional policy in the Settlement Frameworks Chapter:

Policy SF-P-xx: To guide development of all settlement frameworks including Lifford, Raphoe, Bunbeg-Derrybeg and Milford in a sequential manner, outwards from the core area in order to maximise the utility of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap-frogging' to more edge-of-centre and edge-of-town areas and to make better use of under-utilised land. This policy shall not apply to small-scale business enterprises (excluding retail development) of circa 1 to 5 employees.

(This is considered to be a material alteration.)

- 2) To add a label to the Core Strategy Diagrammatic Map for Raphoe, Bunbeg-Derrybeg and Milford.

(This is considered to be non-material.)

NWRA DCDP-262

Advises that not apportioning housing units below the 'Service Towns' layer (ie. not breaking down the overall number of units for the 'Rural Settlements' layer to each settlement) 'could prove problematic in monitoring the Plan.'

Chief Executive's Response:

It is reasonable that the Services Towns layer is considered in the round, rather than on a settlement-by-settlement basis. This is because the reality is that development activity in many of these settlements will be modest due to many factors including market conditions and, in some cases, infrastructural capacity issues.

Chief Executive's Recommendation 3.5:

Not to make any amendments.

UISCE EIREANN DCDP-138**Wastewater**

UE provides detailed commentary on Letterkenny, the County Growth Drivers and Service Towns as follows:

	UE Primary Comment	UE Additional Comment
Letterkenny	Envisaged 'adequate spare capacity'.	Refers to the 'excess of zoned lands for Letterkenny, and note that if all of these lands were fully developed, strategic network reinforcements as well as treatment plant upgrades may be required in some settlements. A more focussed approach with a reduced quantum of residential zoned lands would assist in forward planning for future infrastructure needs and support compact growth.
Buncrana	Spare capacity for majority of targeted population increase. Project underway to provide additional capacity. Envisaged will be completed during lifetime of Plan and will provide sufficient spare capacity.	(as for Letterkenny)
Ballybofey/Stranorlar	WWTP recently upgraded. Envisaged 'adequate spare capacity'.	(as for Letterkenny)
Donegal Town	Envisaged 'adequate spare capacity'.	
Killybegs	Envisaged 'adequate spare capacity'.	
An Clochan Liath	Envisaged 'adequate spare capacity'.	
Lifford	Envisaged 'adequate spare capacity'.	
Carndonagh	Potential spare capacity. Connection applications to be assessed on individual basis.	
Ballyshannon	Envisaged 'adequate spare capacity'.	
Bundoran	Envisaged 'adequate spare capacity'.	(as for Letterkenny)
Raphoe	No capacity at present. However, project underway to provide additional capacity. Envisaged will be completed during lifetime of Plan and will provide sufficient spare capacity.	

Bunbeg/Derrybeg	Working to deliver an innovative project to provide a sewage collection and treatment system. However, completion 'expected to be beyond the lifetime of the Plan'.	
Milford	Ramelton-Milford-Rathmullan WWTP project at construction and will include sufficient spare capacity.	

UE also note that the majority of Rural Settlements are served by public wastewater treatment infrastructure and have capacity available, refer to the capacity register for further detail. However, there are a number of settlements included with no UÉ wastewater infrastructure (Bruckless, Frosses, Baile na Finne, Loch an Iúir, Greencastle, Quigleys Point and Portsalon) and others that are served by UÉ but with no spare capacity at present or project planned (An Charraig, Creeslough, Na Dúnaibh and Castlefin).

Finally, UE advises of the following wwtp projects:

WWTP projects in Carrigans, Lifford and Killea were recently completed. In addition, there are a significant number of WWTP projects ongoing in County Donegal which include provision for growth.

- Stage 1-WWTP projects in Muff, Gweedore (Bunbeg-Doirebeg) and Raphoe are currently at Strategic Assessment stage.
- Stage 2-Design has commenced for WWTP projects in Ballyliffin, Dunfanaghy/ Portnablagh.
- Stage 3-Buncrana, Merville, Falcarragh, Ballintra, Carrigart, Kilmacrennan and Pettigo.
- Stage 4-Rathmullan-Milford-Ramelton, Kilcar, Kerrykeel, Burtonport and Coolatee are at construction stage.

Water Infrastructure

UE submitted a table providing an overview on the ability of its water resource zones to service the key settlements identified in the Core Strategy. A summary of the key points identified in the table is included below:

Letterkenny & Inishowen East & Eddie Fullerton Pollan Dam	Letterkenny	Potential Spare Capacity -LoS improvement required
	Milford	Potential Spare Capacity -LoS improvement required
Buncrana	Buncrana	Capacity Available
Donegal (River Eske)	Donegal	Potential Spare Capacity -LoS improvement required
Killybegs	Killybegs	Capacity Available
INISHOWEN WEST & Carndonagh & Culdaff	Carndonagh	Potential Spare Capacity -LoS improvement required
Ballyshannon & Bundoran	Ballyshannon	Capacity Available
	Bundoran	Capacity Available
Lough Mourne	Ballybofey-Stranorlar	Potential Spare Capacity -LoS improvement required
	Lifford	Potential Spare Capacity -LoS improvement required
	Raphoe	Potential Spare Capacity -LoS improvement required
Rosses	An Bun Beag-Doirí Beag	Potential Spare Capacity -LoS improvement required
	An Clochán Liath	Potential Spare Capacity -LoS improvement required

UE also notes recent extensive works in Letterkenny (eg. Illies WWTP minor improvement nearing completion; potential new sources at Ballymacool being investigated; and a project to further augment supply from Illies WTP to Letterkenny to provide for growth is at detailed design stage.

Works also ongoing at a number of other supplies across the county to improve the level of service e.g. upgrade works at Owenteskna Water Supply Scheme, Crollly WTP, Lough Mourne, Milford, FanadEast, Glentiesand Culdaff WTPs. Works to supplement supply at Pettigo, Lough Mourne, Ballyshannon, Ballymacool and Carndonagh are being progressed via our Groundwater Programme. Feasibility Studies are underway to verify the preferred approaches identified in the North-West Regional Water Resources Plan for Lough Mourne/Ballyshannon /Bundoran WRZs, as well as Rosses WRZ.

Finally, UE also advises that, with DCC, are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities.

Chief Executive's Response:

Notwithstanding that the County continues to face significant challenges in terms of water infrastructure, the generally positive comments of UE in relation to the capacities of the key settlements identified in the Core Strategy serve to ratify the settlement hierarchy contained in the Draft Plan.

Chief Executive's Recommendation 3.6:

Not to make any amendments.

Section 4: Climate Change

OPR DCDP-211

The comments of the OPR are generally positive. Observation 3 advises in respect of three issues:

Observation 3 - Climate action

The planning authority is advised to:

- (i) highlight key climate change policy / objective responses throughout the Plan, such as through use of an indicator symbol as employed in the South Dublin County Development Plan 2022-2028;
- (ii) include the evidence-base (sieve analysis) for wind energy map 9.2.1 as an appendix to the Plan; and
- (iii) consider the inclusion of clear policies and objectives on requirements for blue / green infrastructure, treatment of riparian corridors, and requirements for nature based solutions, including reference to *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).

Chief Executive's Response:

Item (ii.) is addressed in Chapter 9: 'Natural Resource Development'.

The advisories on Items (i.) and (iii.) are agreed and are addressed in the recommendation below.

Chief Executive's Recommendation 4.1:

(i.) Highlight key climate change policy/objectives using an indicator symbol.

(This is considered to be non-material and can be incorporated into the adopted Plan.)

(ii.) Insert new narrative and Policies re blue/green infrastructure immediately before Section 4.3 'Objectives, Chap. 4 – 'Climate Change':

Green and Blue Infrastructure

Green and Blue Infrastructure describes the network of natural and semi-natural spaces and corridors in a given area. These include open spaces such as parks and gardens, but also allotments, woodlands, fields, hedges, lakes, ponds, playgrounds, coastal habitats, footpaths, cycle routes and water courses. It is referred to as 'infrastructure' as it is considered to be as important as other types of infrastructure such as roads, schools and hospitals. Successful green and blue infrastructure planning is also recognised as a natural solution and alternative to 'grey' infrastructure (utilities, transport infrastructure, flood control) that is environmentally friendly and less expensive.

CA-P-1 To integrate Green Infrastructure into new developments, where feasible, to contribute to the County's green infrastructure network by its extension and enhancement and to provide for the environmental resilience of new development.

CA-P-2 To avoid the fragmentation of green spaces in site design and to link green spaces/ greening elements to existing adjacent green infrastructure / the public realm where feasible.

(This is considered to be a material alteration.)

The OPR also comments here on wind energy policy and flood risk management. These comments are addressed in Chapters 8.4: 'Flood Risk Management'; 9: 'Natural Resource Development'; 18: Buncrana; 19: Ballybofey/Stranorlar; 20: Bundoran; and 20: Settlement Frameworks'.

NWRA DCDP-262

Whilst not containing any relevant recommendations, the NWRA report does:

- a. note that the Chapter 'does not clearly articulate a Climate Action policy for County Donegal, although it does refer to cross-cutting measures which are set out elsewhere in the Plan, such as Sustainable Mobility and compact growth';
- b. make suggestions regarding how the commentary of the Chapter could be strengthened, including reference to the pursuit of the Compact Growth strategic outcome outlined in the NPF & RSES, and recent significant additions to Government Policy, including the Climate Action Plan; a revision which reflects 'the very significant contribution' already being made in County Donegal in the area of Renewable Energy; and
- c. notes that identification of a Decarbonising Zone for the County is not referenced.

Chief Executive's Response:

Regarding point. 'a', the structure of the Plan in terms of setting out the relevant climate action policy approach in 'sectoral' chapters is considered reasonable.

With regard to strengthening commentary, amended wording will be included, particularly in light of the recent publication on 9th November, of the Council's Draft Climate Action Plan, 2024-2029 ('the DCAP'). The DCAP includes proposals for two Decarbonising Zones and these can be addressed in this commentary.

Chief Executive's Recommendation 4.2:

Insert the following text into Chapter 4, Section 4.1 Introduction:

The recently published Draft Local Authority Climate Action Plan (LACAP) 2024 to 2029 sets out how Donegal County Council (DCC) will be responsible for enhancing climate resilience, increasing energy efficiency, and reducing greenhouse gas emissions, across its own assets, services, and infrastructure, for which it is fully accountable, whilst also demonstrating a broader role of influencing, advocating, and facilitating other sectors, to meet their own climate targets and ambitions. This is necessary to ensure that the environmental, social, and economic benefits that come with climate action, can be fully realised. The County Development Plan shall be read in conjunction with the Draft Climate Action Plan and seek to actively translate national climate policy to local circumstances, assist in the delivery of the climate neutrality objective at local and community levels, and identify and deliver on Decarbonising Zones within the local authority area.

(This is considered to be non-material.)

DCDP-25 Defending Environmental Wealth

Suggests that development including any form of demolition must submit a demolition report to set out the rationale for the demolition having regard to the embodied carbon of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.

Chief Executive's Response:

The suggestion will be addressed in the proposed policy below.

Chief Executive's Recommendation 4.3:**Insert new section at the end of Chapter 16 Technical Standards:**

Demolition of structures: Any proposals to demolish a building or structure should be accompanied by a report prepared by a suitably competent person that sets out the rationale for the proposed demolition having regard to the embodied carbon of the existing structures, the additional use of resources, materials and energy arising from any proposed new construction relative to the potential reuse of the existing structure.

(This is considered to be a material alteration.)

DCDP-85 Ron Ferguson

This very detailed submission questions the legitimacy of the international policy approach to, and general acceptance of, the existence and dangers of global warming. It challenges theories around the global warming agenda being propagated by vested interests for the purpose of profiteering at the expense of ordinary people. The writer applies these concerns to Ireland and gives practical examples of how this agenda is, and will be, damaging to people in Ireland. These examples include environmental impacts of degrading wind turbines, impacts of offshore windfarms on the safety of our coastal maritime routes, reduction of the cattle herd, and the agricultural opportunity costs of emerging re-wetting policies.

The general content of the submission concludes by asking does the CDP have a corrective role against the climate change agenda.

(nb. the submission goes on to make detailed points in relation to wind energy (does the CDP have a role in the creation of improved supervision and monitoring of windfarms to ensure environmental safety standards are maximised?); with ideal windspeeds, Donegal would be an ideal location for data centres; and more ambitious berthing facilities at Rathmullan. These are addressed in Chapters 9.2 (Wind Energy); 8.3 (Telecoms); and 14 (Marine Resource, Coastal Management, and the Island) respectively.

Chief Executive's Response:

The Planning Authority is obliged to adhere to national policy. National policy, as expressed in numerous national policy documents, is aligned with the established climate change agenda. Therefore, it has to be concluded that the County Development Plan does not have 'a corrective role' against the climate change agenda. No recommendations are made on this issue.

Section 5: Towns and Villages

(OPR Recommendation 16(i)(h) requires a review, from a flood risk perspective, of the regeneration priority areas in the following settlement frameworks:

This is addressed in Section 21 of this report.)

OPR DCDP-211
NWRA DCDP-262
<p>OPR Recommendation 10(i.) requires the Authority to 'set out a clear strategy to tackle the high level of derelict and/or vacant buildings in Bunrana, Ballybofey/Stranorlar and Bundoran.</p> <p>Refers to the identification a list of smaller settlements and their important community function, and the commitment in the Draft to the initiation of a programme, in consultation with all relevant stakeholders including local communities, to examine opportunities for appropriate strategic interventions (on pages 32-33 in the Draft Plan). Observes that this is a 'laudable ambition consistent with RSES RPO 3.13 and it could be enhanced through the inclusion of a timeframe for the delivery of a report/programme'.</p>
<p>Chief Executive's Response:</p> <p>Accepted. It is considered that such a strategy would benefit not just the three specified towns but on an all-County basis. A commitment to developing such a strategy is set out in the recommended additional narrative below.</p>
<p>Chief Executive's Recommendation 5.1:</p> <p>Insert additional narrative in Chapter 5 as follows:</p> <p>"Building on the success of its Urban and Rural regeneration work programme to date, the Councils Regeneration & Development Team together with the Town Regeneration Officer and Vacant Homes Officer will develop a co-ordinated Countywide Strategy for the regeneration and renewal of the County's Towns & Villages which will:</p> <ul style="list-style-type: none"> (i) Set out a new work programme for the Team within the Plan period with the overall aim of attracting investment from the range of funding programmes available together with effective use of statutory measures to: develop high quality Urban and Rural settlements which contribute to regeneration and renewal, compact growth, provision of viable housing options, opportunities for economic development, address vacancy and dereliction; and which empowers local communities as key partners and stakeholders in the process through the consultation, delivery and implementation stages. (ii) Align with the Strategic Vision, Ambition and Core Strategy of this Plan and set out a phased approach to implementation following the Settlement Hierarchy of Growth Centre, Growth Divers, Service Towns and Rural Settlements set out in Chapter 3. (iii) Integrate existing Regeneration Strategies, Action Plans and Town Centre First Plans into the wider Strategy and work programme. (iv) Continue to develop agreed, endorsed and priority projects within the work programme towards eligibility for project development and capital works funding under future calls of the Urban and Rural Regeneration and Development Funds. (v) Work to establish Town Teams, develop Town Centre First Plans and implement Town Centre First projects under the Town Centre First Policy Approach for Irish Towns and supporting funding programmes. (vi) Set realistic targets and identify specific implementation actions for the reduction of vacancy and dereliction within core town centre environments, including (a) progressing the abovementioned measures (i) – (v); and (b) proactively engaging with

- property and home owners on the range of supports available together with effective use of statutory measures under the Croi Conaithe Towns Initiative, CPO Activation Fund and Derelict Sites Act, 1990 etc. to bring properties back into use.
- (vii) Include a programme for performance monitoring and evaluation. "

(This is considered to be non-material.)

NTA DCDP-239

Includes a recommendation to insert an additional objective to reflect the requirement to incorporate (sustainable) transport objectives and projects into regeneration schemes.

Chief Executive's Response:

Agreed.

Chief Executive's Recommendation 5.3:

Insert additional policy in Section 5.2:

'To ensure that the Plan's transport objectives (including those in LAP's and LTP's) for active travel projects and public transport infrastructure are considered and incorporated into regeneration projects as required.

(This is considered to be non-material.)

Section 6: Housing

Section 6.1 Housing Strategy

NWRA DCDP-262
Redress Focus Group DCDP-254
<p>The NWRA recommends that the Plan and its Core Strategy/Housing Strategy be amended to account for 'the current and future wide-ranging implications' of the Defective Block / Mica Crises in County Donegal, including the potential reconstruction of 5,800 houses. The revision should reflect upon the need for temporary/modular accommodation and the impact the crises will have upon the construction sector in terms of short-term and medium-term overall housing output, including the effects this may have on the targets for urban centres set out with Sec. 3.4 of the RSES.</p> <p>The Redress Group criticises the lack of coverage of the defective concrete blocks issue and requests the inclusion of relevant policies 'to deal with the many issues that have to be overcome'. Also requests a review of the Plan in terms of temporary accommodation and the use of modular accommodation in meeting such needs.</p>
<p>Chief Executive's Response:</p> <p>The comments of the Redress Group are acknowledged. Whilst progress on dealing with the issue has been slower than any of the stakeholders would have wanted, Donegal County Council is fully committed to fulfilling its role under the Enhanced Defective Concrete Blocks Scheme. In this context, I would make two comments in relation to the implications of the crisis for the Development Plan.</p> <p>Firstly, it is not anticipated that the crisis will generate the need for any significant additional housing units over and above 'regular' demand as most affected units will either be replaced on a like-for-like basis or remediated through partial reconstruction.</p> <p>There are separate provisions under the enhanced defective concrete blocks grant scheme in relation to funding for homeowners in respect of sourcing alternative accommodation, as well as storage costs. Should the need for multiple temporary accommodation units arise, the Planning approach will be to deal with the issue as an emergency in which case maximum flexibility will be applied in the consideration of such proposals whilst continuing to observe basic good practices in terms of suitability of location and so on. In respect of tenants of social houses, the Council has already been making, and will continue to make, necessary arrangements where tenants are required to move out of their accommodation.</p>
<p>Chief Executive's Recommendation 6.1.1:</p> <p>Insert the following text as a new section 6.1.20 in Chapter 6:</p> <p>The commencement of the legislation relating to the Remediation of Dwellings Damaged by the Use of Defective Concrete Blocks (2022) seeks to enable the remediation options available for homeowners. Related to those mechanisms providing for the remediation of homes, there are associated matters for planning authorities to consider in providing a means for homeowners to ensure that their homes are consistent with their original planning permission and specific advice has been developed to guide homeowners on issues relating to their property (https://www.donegalcoco.ie/media/donegalcountyc/mica/Defective%20Concrete%20Blocks%20Planning%20Services%20Advice%20Note%20-%20November%202023%20Update.pdf) .</p> <p>This advice is provided to:</p> <ul style="list-style-type: none"> (i) ensure a consistent approach to the planning advice given to homeowners, (ii) ensure that robust opinions in relation to potential non-material changes are provided, and

- (iii) ensure that the regularisation of non-compliant aspects of a previously permitted dwelling is undertaken in a timely fashion.

The provisions of S28 of the 2022 Act specifically apply in that works associated with an approved remediation option are exempted development and that it facilitates the assessment of non-material modifications to a permitted dwelling under the Planning and Development Act.

Where applications for the demolition and rebuilding of a home are submitted by a homeowner (separate to the provisions of S28 of the 2022 Act) these will be assessed as a replacement dwelling having regard to current policy. The commitment of the council is to ensure that properties affected by defective concrete blocks are identified and managed as significant applications and they will be managed in a way that ensures as early a decision as possible after the mandatory 5-week public consultation period.

The Council is committed to continuing to guide and advise affected property owners on planning matters within the scope of the Defective Concrete Blocks legislation.

(This is considered to be non-material.)

OPR DCDP-211

Under Recommendation 11, the OPR refers to the requirements of the Planning Authority under S.10(2)(i) of the Act to include objectives for the provision of accommodation for Travellers, and the use of particular areas for that purpose.

Chief Executive's Response:

The inclusion of the objective referred to by the OPR is indeed a mandatory objective and this is referenced in the recommendation below. Specifically regarding the use of particular areas the following comments are relevant. The preparation of the new Traveller Accommodation Programme (TAP) will be commencing before the end of 2023. The current programme expires on 30th June 2024 and the incoming programme will likely cover the period 2024 – 2029. There is a comprehensive consultation process including an assessment of need of Travellers in the County and submissions invitations from the public, local representative groups, adjoining housing authorities, HSE, DTP, Voluntary bodies, community and interest groups etc. to inform the preparation of the programme. This will ultimately inform in terms of Traveller accommodation need and delivery in the County over the period of the incoming programme. The significant vast majority of Travellers in Donegal are opting for standard social housing. The Council has delivered one-off small-scale Traveller-specific projects and accommodation proposals on Traveller-specific sites as well as refurbishment and upgrade of existing Traveller-specific sites but as it stands (in advance of the preparation process for the TAP), there is no demand for Traveller-specific sites in the County. There are several proposals for SI's as part of Traveller accommodation delivery but these are traditional SI's on local authority lands that require rebuilds.

Chief Executive's Recommendation 6.1.2:

- a. Insert additional objective in Section 6.1:

'To provide accommodation for travellers, and to identify and use particular areas for this accommodation as and when such a need is identified in consultation with relevant stakeholder.

(This is considered to be a material alteration.)

- b. Not to identify specific sites, for the reasons set out above.

(This is considered to be non-material.)

Land Development Agency (LDA) DCDP-104

Advises that can support the delivery of social and affordable housing. Homes etc. It is suggested that a specific objective should be included to support the LDA in bringing forward land(s) for the delivery of affordable housing.

Chief Executive's Response:

The role of the LDA particularly in the delivery of affordable and cost-rental housing provision in Ireland is acknowledged as a key element of the Government's Housing For All strategy. Whist County Donegal does not currently have an affordable programme the Council could support the LDA in bringing forward proposals should the affordable programme be extended to include Donegal in the future.

Chief Executive's Recommendation 6.1.3:

No amendments required.

Kenneth Harper DCDP-4

Essentially suggesting that DCC should be providing more apartments.

Chief Executive's Response:

The Council's housing delivery programme is informed by the approved Social Housing waiting list which will see the delivery of more 1 and 2 bed properties including apartments. The programme for meeting smaller unit demand is illustrated by the following data:

- Letterkenny/Milford MD – 76% approved for 1&2 bed properties.
- Inishowen MD – 64% approved for 1&2 bed properties.
- Glenties MD – 75% approved for 1&2 bed properties.
- Lifford/Stranorlar MD – 75% approved for 1&2 bed properties.
- Donegal MD – 73% approved for 1&2 bed properties.

Chief Executive's Recommendation 6.1.4:

No amendments required.

Faite Ireland DCDP-189

Advises that there is a challenge for counties like Donegal whereby population levels fluctuate on a seasonal basis and seasonal workers are competing with tourists for accommodation. This is a specific housing demand that needs to be addressed in the Development Plan

Chief Executive's Response:

Given the acknowledged temporary nature of such accommodation requirements, this matter is considered to be outwith the scope of the development plan.

Chief Executive's Recommendation 6.1.5:

No amendments required.

Section 6.2 Urban Housing

Internal Review
<p>The current CDP contains the following policy:</p> <p>UB-P-17: It is a policy of the Council to consider proposals for urban residential development that seek to resolve existing unfinished residential development, including through appropriate reconfiguration of developments, and such proposals shall be considered outside the population targets set by the core strategy.</p> <p>The Draft CDP does not include an equivalent policy.</p>
<p>Chief Executive’s Response:</p> <p>The subject policy was omitted unintentionally at drafting stage. Whilst the legacy of unfinished estates is being addressed in a systematic manner, the issue remains a challenge for the Authority. Therefore, it is considered that the subject policy should be included in the new Development Plan to allow consideration of such proposals as and when they come forward.</p>
<p>Chief Executive’s Recommendation 6.2.1:</p> <p>To insert the equivalent of Policy UB-P-17 as contained in the CDP 2018-2024.</p> <p>(This is considered to be a material alteration)</p>

Section 6.3 Rural Housing

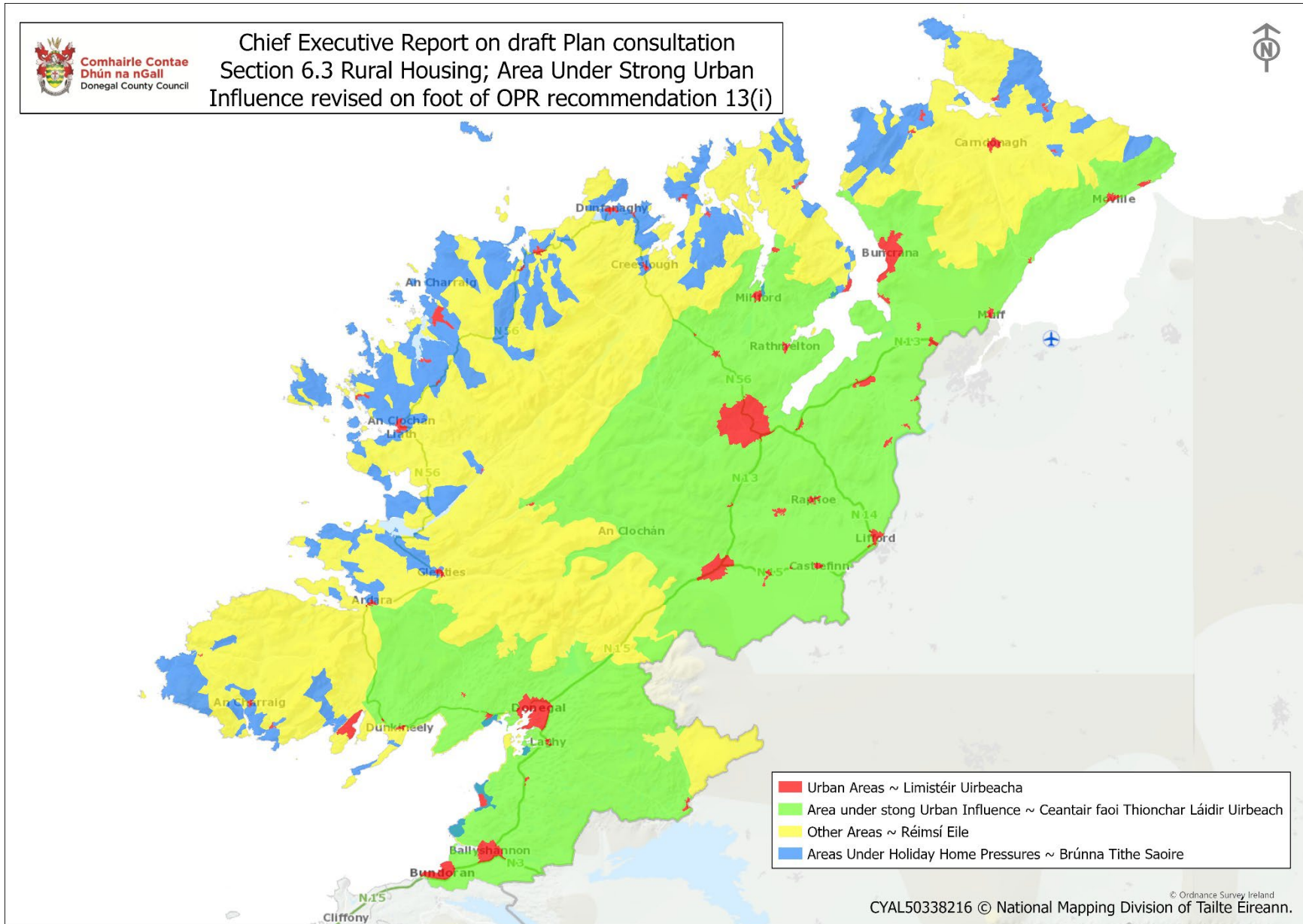
Designated 'Areas Under Strong Urban Influence' and 'Areas Under Strong Holiday Home Influence'

OPR DCDP-211
NWRA DCDP-262
<p>1) OPR recommendation 13(i.) and NWRA recommendation (iii.) make similar recommendations regarding the rationale for identifying 'Areas Under Strong Urban Influence' (AUSUI) on Map 6.3.3: Rural Area Types'. The OPR recommendation is inserted below:</p> <p style="background-color: #e0f0ff;">the planning authority is required to amend:</p> <p style="background-color: #e0f0ff;">(i) map 6.3.1 Rural Area Types, including the defined 'areas under strong urban influence' based on the evidence of commuter distance to Letterkenny, Derry/Londonderry and the other main centres, having regard to the average commuter journey time for the county;</p> <p>2) OPR recommendation 13(ii.) addresses Policy RH-P-1 (re one-off housing in AUSUI areas, and Policy RH-P-2 (re one-off housing in Areas Under Strong Holiday Home Influence):</p> <p style="background-color: #e0f0ff;">(ii) Policy RH-P-1 and Policy RH-P-2 to omit consideration of family ties to the rural area and to include consideration of '<i>demonstrable economic or social need to live in a rural area</i>' and of '<i>the viability of smaller towns and rural settlement</i>'; and</p>
<p>Chief Executive's Response:</p> <p>Item (i) requires the planning authority to define those 'Areas under Strong Urban Influence' through the use of evidence based on commuting distances as indicated by available CSO data. The requirement will notably alter the extent of the area under strong urban influence and will be a material amendment to the draft plan.</p> <p>Item (ii) requires that draft policies RH-P-1 and RH-P-2 omit references to family ties from these policies and include provisions that focus on the demonstration of economic or social need to live in a rural area and the viability of smaller towns and rural settlements. The Regulator cites the National Policy Objective (NPO19) as the national context for requiring alterations to these draft policies to render them consistent with the National Planning Framework. The text of policies RH-P-1 and RH-P-2 will be amended to accord with the requirements detailed by the OPR.</p>
<p>Chief Executive's Recommendation 6.3.1:</p> <p>a. Prepare new mapping of 'Areas Under Strong Urban Influence' for inclusion in a revised Map 6.3.1. (See map below).</p> <p>b. Amend policies RH-P-1 and RH-P-2 as set out below. (<i>new text in blue</i>)</p> <p>Policy RH-P-1: To consider proposals for new one-off rural housing within 'Areas Under Strong Urban Influence' from <i>prospective applicants that can provide evidence of a demonstrable economic or social need to live in these areas</i>. The foregoing is subject to compliance with other relevant policies of this plan, including Policy RH-P-9.</p>

This policy shall not apply where an individual has already had the benefit of a permission for a dwelling on another site unless exceptional circumstances can be demonstrated. An exceptional circumstance would include, but would not be limited to, situations where the applicant has sold a previously permitted, constructed, and occupied dwelling, to an individual who fulfils the bonafides requirements of that permission. New holiday homes will not be permitted in these areas.

Policy RH-P-2: To consider proposals for new one-off rural housing within 'Areas Under Strong Holiday Home Influence' from prospective applicants that can provide evidence of a demonstrable economic or social need to live in these areas. The foregoing is subject to compliance with other relevant policies of this plan, including Policies RH-P-9. This policy shall not apply where an individual has already had the benefit of a permission for a dwelling on another site, unless exceptional circumstances can be demonstrated. An exceptional circumstance would include, but would not be limited to, situations where the applicant has sold a previously permitted, constructed and occupied dwelling, to an individual who fulfils the bonafides requirements of that permission. New holiday homes will not be permitted in these areas.

(These are considered to be material alterations.)



Areas Designated 'Other Rural Areas'

OPR DCDP-211
OPR recommendation 13(iii.) addresses Policy RH-P-3 re one-off housing in 'Other Rural Areas': <div style="background-color: #e0f2f1; padding: 5px;"> <p>iii) Policy RH-P-3 and GEN-H-2 to include consideration of <i>'the viability of smaller towns and rural settlement'</i>.</p> </div>
<p>Chief Executive's Response:</p> <p>Agreed, having regard to the rationale set out by the OPR in referring to the inclusion of this element in National Policy Objective NPO 19.</p>
<p>Chief Executive's Recommendation 6.3.2:</p> <p>Amend Policy RH-P-3 (new text in blue):</p> <p>'To consider proposals for new one-off housing within other rural areas from any prospective applicants with a demonstrated rural need for a dwelling house, subject to consideration of the viability of smaller towns and rural settlements, and compliance with all other relevant policies of this Plan including Policy RH-P-9. New holiday homes will not be permitted in these areas.'</p> <p>(This is considered to be a material alteration.)</p>

Target for New Rural Housing On Brownfield Sites

NWRA DCDP-262
Recommendation (iv.) requires that the plan be amended to include a policy objective to give effect to RPO 3.3 in the RSES: <div style="background-color: #bbdefb; padding: 5px; border: 1px solid #90caf9;"> <p>RPO 3.3</p> <p>Deliver at least 20% of all new housing in rural areas on brownfield sites.</p> </div>
<p>Chief Executive's Response:</p> <p>Having regard to the general obligations of the Authority to adhere to comply with the contents of the RSES, the recommendation below is to include this policy and this is agreed. (NB. the RSES noted that this might be achieved by amending Objective RH-O-5).</p>
<p>Chief Executive's Recommendation 6.3.3:</p> <p>Amend Policy RH-O-5 (new text in blue):</p> <p>To facilitate the positive re-use of existing vacant rural housing stock in the County and to deliver at least 20% of all new housing in rural areas on brownfield sites to seek to prevent further deterioration and dereliction.</p> <p>(This is considered to be a material alteration.)</p>

Proposed Clachan, Cloghore

DCDP-133 Rockfield Community Co-op Ltd
DCDP-146 Cloghore Area Residents' Group
DCDP-212 N & S Cullen
DCDP-215 Cllr. B. Sweeey
<p>The Cloghore area is a rural border community located approximately 5.5Km from Ballyshannon town adjacent to the bank of the River Erne. There are many residential properties in the area, as well as Rockfield National School and Rockfield Community Hall. The area is not in an area as being under Strong Urban Influence, and there are no known holiday homes in the vicinity.</p> <p>Cloghore has been identified as a Rural Area within Tier 5 of the settlement hierarchy, as set out in the in section 3.3 of the plan and given its proximity to the border and Beleek there is limited scope to recognise this as a distinct settlement as opposed to a rural area adjacent to the border town.</p>
<p>Chief Executive's Response:</p> <p>No amendment to the plan is proposed on the basis of the physical proximity/links to Beleek and to all the development immediately to the south that is in NI.</p>
<p>Chief Executive's Recommendation 6.3.4:</p> <p>No change recommended.</p>

Section 7: Economic Development

7.1 General Content

NWRA DCDP-262

The NWRA submission makes several suggestions on how the Chapter could be strengthened. These suggestions include providing a stronger focus on:

- **North West City Region:** The growth potential and direction of travel of Donegal within the context of the NWRC could be improved;
- **Digital Hubs and Co-Working spaces:** Donegal has made significant progress on the provision of facilities across the County, and whilst this is articulated at Chap. 7.1 & 7.4.5, the Hubs should be detailed and mapped to provided additional spatial clarity.
- **Key Enabling Infrastructure:** As well as Housing, the future economic success and development of Donegal is contingent to a significant extent upon the provision of key infrastructure. The legacy of underinvestment over decades has been identified as an issue of strategic concern in terms of its competitiveness, and impact on inward investment and economic growth. The recent results of the EU Competitiveness Index show the Region fairing very poorly in a National and European Context, and this is reinforced in Donegal, which remains without rail and has not benefitted from necessary significant investment in transport infrastructure projects of scale.

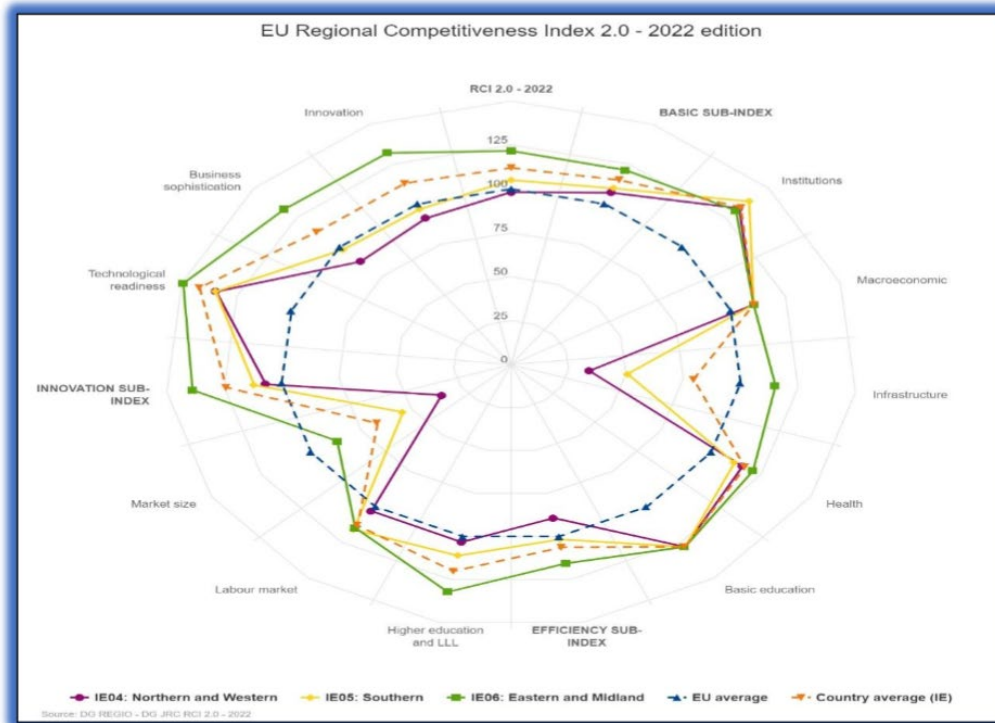


Fig.1: Index scores of the NUTS 2 Regions of Ireland in the European Commission's 2022 "Regional Competitiveness Index", (Blue line = EU27 average)

Identifies various 'critically enabling projects' as crucial and advises that these should be highlighted more prominently within Chapter 7:

- The TEN-T Scheme Route Improvement;

- The conclusion of the delivery of the National Broadband Plan;
 - The continued expansion of the ATU;
 - The pursuit of an expanded and diversified role for Killybegs Port;
 - Enhancement of National Grid capacity to enable Marine Renewable Technology development in the future;
 - The progression of a Rail Service for County Donegal;
 - Significant enhancement of Public Transport provision, including a Transport Hub in Letterkenny.
- **Key Towns/Interventions:** The particularly weak position of Buncrana, as the County's second largest settlement (Resident Workers to population Ratio of 0.854) should be noted and there would be benefit in the plan reflecting any specific objectives / series of interventions that can be put in place for the specific Key Towns as part of the longer-term strategy to improve the performance of those underperforming Towns.
 - **Bio-Economy sector:** There would be benefit in referencing this sector, where there are Regional Policy Objectives in Chapter 4 of the RSES, which attempt to bring effect to the ongoing work at National Level. There is currently no reference directly or indirectly to this element of rural economic activity with the Draft Plan.
 - **Marine and Blue Economy/Killybegs and Greencastle:** Noted that the plan acknowledges the importance of the Marine and Blue economy within Chapter 7. However, the plan could articulate more clearly how it is delivering upon Regional Policy Objectives 4.3.1 -4.3.5 of the RSES, with particular reference to Killybegs and Greencastle, which are noted as being of regional significance in the RSES. It could also reflect upon the support given in the RSES to examining the feasibility for pursuing the designation of Killybegs Port as an EU TEN-T Comprehensive Port. These issues should also be articulated/cross referenced in a consistent manner with those within Chapter 14.

Chief Executive's Response:

The comments of the NWRA are very constructive and, whilst all of these issues with the exception of the bio-economy are already given strong coverage in different parts of the Plan, it is agreed that the Economic Development Chapter could be strengthened as suggested. It is considered that most of these issues may be addressed by way of additional non-material narrative. The **Key Towns/Interventions** comments are considered particularly relevant for Buncrana and Ballybofey/Stranorlar and these are addressed in Sections 18 and 19 respectively.

With regard to the **Bio-Economy sector** (defined as using renewable biological resources from land and sea, like crops, forests, fish, animals and micro-organisms to produce food, materials and energy) it is agreed that the Plan should address this emerging policy issue, particularly given the policy coverage contained in the RSES in RPOs 4.20, 4.27-4.29 inclusive.

Chief Executive's Recommendation 7.1:

Insert additional narrative:

- a) As one of the three pillars of regional growth guiding the collaborative activities of the North West Strategic Growth Partnership (NWSGP), the spatial strategy seeks to support a vision and the principles on which the region's economy needs to be supported. A wholly integrated approach to economic planning which gives expression to the best practice principles of place making and strong regions, while also going beyond a policy template which stops at the border, is what will be required for the NWCR to tackle the negative impacts of its historical infrastructure baseline deficit and deliver a just transition which addresses the acute economic

and social inequalities experienced in the region's economy. Existing cross border collaborative working and networking arrangements between key council staff already focuses across a range of sectors, including economic development and spatial planning. In recognising the importance of existing collaborations, it will be essential that there is connectivity between these strands of work in the context of the development and implementation of a spatially led approach to deliver the effective and sustainable development of the City Region.

- b) Narrative setting out the importance of for the economy of the North West City Region; Digital Hubs and Co-Working spaces; Key Enabling Infrastructure;; and the Marine and Blue Economy/Killybegs and Greencastle.

(This is considered to be non-material and will be submitted to Members at a future Plenary meeting.)

- c) Insert additional narrative and policy:

The Bioeconomy

'The RSES defines the bioeconomy as 'those parts of the economy that use renewable biological resources from land and sea to produce food, feed and bio-based materials and energy. This includes crops, forestry, fisheries aquaculture, animals and their residues and by-products from processing industrial feedstock resources such as municipal solid waste and wastewater or novel products such as micro-organisms.' The RSES provides support for this sector in several RPOs.

Policy ED-P-xx:

To support:

- a. The potential the principle of the creation of appropriately scaled local multi-feedstock bio-refining hubs and bio-clusters; and
- b. The future-proofing of infrastructure planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio-renewable energy for the sustainable production of bio-based plants.

(This is considered to be a material alteration).

7.2 Business in the Rural Area

OPR DCDP-211

NWRA DCDP-264

The OPR and the NWRA note concerns regarding the support for businesses in the rural area. The OPR refers to Section 10(2)(n) of the P&D Act and the requirement therein for objectives to promote sustainable settlement and transport strategies in rural areas. In particular, the OPR references **Policy ED-P-8** noting that it '*allows major industry/enterprise to be considered in the countryside, albeit in exceptional circumstances*'; and Policy ED-P-11 '*allowing unspecified commercial development to be considered on the periphery of settlements where it would be incompatible with, and detrimental to, the centres*'. The OPR concludes by observing that: '*The proposed policy approach will encourage significant development outside town boundaries and does not therefore accord with the requirement for objectives to promote sustainable settlement and transport strategies. It is also inconsistent with NPO 11 to encourage more people and generate more jobs and activity within existing cities, towns and villages; and RPO 3.13 to support the role employment and service provision role of smaller and medium sized towns. The Office notes that the SEA Environmental Report highlighted potential negative effects arising from these policies, specifically in terms of air and climatic factors.*

OPR Recommendation 14(ii.) requires the Authority to omit relevant policies ED-P-8 and ED-P-11.

Chief Executive's Response:

It is acknowledged that these recommendations relate to issues that were considered in great detail by Members during the preparatory phase of the Draft Plan and, prior to that, through the Small Businesses Implementation working group. The policy was drafted following further consideration by the Executive. Notwithstanding the concerns of the OPR, it is considered that this broad policy approach does have merit in the context of the Donegal spatial 'landscape', even in the rapidly-evolving national and regional climate change and compact growth agenda. That said, the concerns of the OPR are noted and a revised wording is recommended below in an attempt to address these concerns.

With regard to Policy ED-P-8, the OPR has set out the national policy context in which he has made his recommendation, and it is for these reasons that the recommendation is made below. In responding to the requirement of the OPR, there is a need for an acceptance within Council that an agile response to any viable regionally significant enterprise that might arise on lands outside of settlements would necessitate a variation process to be initiated.

Chief Executive's Recommendation 7.2:

1) To omit Policy ED-P-8 (text to be deleted shown in strikethrough)

~~It is a policy of the Council to consider exceptional proposals for a major industry/enterprise in the countryside which makes a significant Regional contribution to the economy of the County where it is demonstrated that the proposal, due to its site specific requirements or size, requires to be located outside the confines of a settlement. An application for a development proposed under this policy must be accompanied by:~~

- ~~a.evidence to support the case for the potential Regional economic benefit to the economy of the County; and~~
- ~~b.detailed information on the search conducted to secure a suitable site within the boundary of a settlement.~~

~~The provisions of Policy ED-P-10 will also be taken into account and a Travel Plan must be prepared to address the issue of accessibility by various modes of transport. Developer led infrastructural improvements will be conditioned in appropriate cases. Development proposals will be assessed in the light of all relevant material planning considerations, relevant policies of the County Development Plan and other regional and national guidance/policy, relevant environmental designations including demonstration of compliance with Article 6 of the Habitats Directive.~~

2) To omit Policy ED-P-11 and insert revised Policy (text to be deleted shown in strikethrough, new text in blue)

~~To consider commercial developments on the periphery of settlements where such uses would be incompatible with and detrimental to the centres of such settlements by virtue of:~~

- ~~a.the extent of land required for the effective functioning of such an enterprise; and/or~~
- ~~b.the nature of the enterprise, particularly in the context of potentially incompatible or 'bad neighbour' uses.~~

~~All such proposals shall also be considered against other relevant policies of the Plan including, inter alia, traffic and pedestrian safety and public health.~~

~~Convenience and comparison retailing will not be supported in such cases, and proposals shall be considered against the Retail Planning Guidelines and Policy RS-P-3 (sequential test) and RS-P-4 (retail impact assessment) where retailing is proposed. Exceptions to the general presumption against retail development may be used in the case of all developments where the sale of vehicles is the predominant use.~~

Policy ED-P-xx:

To consider commercial developments, excluding traditional High Street uses that would generate regular customer trips (eg. retail, consumer services , café/restraurant, public house etc.), on the periphery of settlements where:

- a. such uses would be incompatible with, and detrimental to, the centres of such settlements by virtue of their inherent 'bad neighbour' characteristics, inclusive of the generation of industrial-scale vehicle trips that would be detrimental to the amenities of the centre; and/or
- b. the extent of land required for the effective functioning of such an enterprise in the centres would be prohibitive.

All such proposals shall also be considered against other relevant policies of the Plan including, inter alia, traffic and pedestrian safety and public health.

Convenience and comparison retailing will not be supported in such cases, and proposals shall be considered against the Retail Planning Guidelines and Policy RS-P-3 (sequential test) and RS-P-4 (retail impact assessment) where retailing is proposed. Exceptions to the general presumption against retail development may be considered in the case of developments where the sale of vehicles is the predominant use.

(This is considered to be a material alteration).

7.3 Office and Light Industrial Developments; and Industrial Buildings and/or Industrial Processes, and Warehouse/Storage Within Settlements (Location Of)

OPR DCDP-211

Policies ED-P-1 deals with proposals for office and light industrial developments within settlements. Part (a) of the Policy is to direct office and light industrial developments to town centre sites, edge of centres locations, or appropriately zoned lands in Letterkenny, Growth Driver Settlements and Service Towns; while Part (b.) allows for consideration of such proposals on lands currently used for such purposes. The Office has no issue with these sub-sections of the Policy.

The Office does, however, express concern over the inclusion of sub-section(c). Sub-section (c) provides that it will be the policy of the Authority:

'To determine such proposals on other lands within settlements on their own merits having regard to the scale and character of the settlement, environmental considerations including the merits of the proposal in terms of sustainable travel outcomes, the availability of necessary infrastructure, compliance with Policy ED-P-10, and compatibility with the locality.'

The Office advises that: *'Notwithstanding the safeguards included in these policies, the Office considers these policies would undermine the land use zoning objectives in the draft Plan.'*

Policy ED-P-2 deals with proposals for industrial buildings and/or industrial processes, and warehouse/storage within settlements. Part (a) of the policy is to direct such development to appropriately zoned lands, or lands currently used for such purposes in Letterkenny, Growth Driver Settlements and Service Towns. The Office has no issue with this sub-section of the Policy.

The Office does, however, express concern over the inclusion of sub-section(b). Sub-section (b) provides that it will be the policy of the Authority:

'To determine such proposals on other lands within settlements on their own merits having regard to the scale and character of the settlement, environmental considerations including the merits of the proposal in terms of sustainable travel outcomes, the availability of necessary infrastructure, compliance with Policy ED-P-10, and compatibility with the locality.'

Similar to its assessment of Policy ED-P-1, the Office advises that: '*Notwithstanding the safeguards included in these policies, the Office considers these policies would undermine the land use zoning objectives in the draft Plan.*'

Recommendation 14(ii)(a.) and (b.) of the OPR submission requires the omission of the referenced Policy ED-P-1(c) and ED-P-2(b).

Chief Executive's Response:

It is again acknowledged that these recommendations relate to issues that were considered in great detail by Members during the preparatory phase of the Draft Plan. Notwithstanding, the OPR has set out the national policy context in which he has made his recommendation, and it is for these reasons that the recommendation is made below.

Chief Executive's Recommendation 7.3:

1a.) To omit Policy ED-P-1(c) (~~text to be deleted in strikethrough~~)

- a. To direct office and light industrial developments to town centre sites, edge of centres locations, or appropriately zoned lands in Letterkenny, Growth Driver Settlements and Service Towns.
- b. To consider such proposals on lands currently used for such purposes.
- ~~c. To determine such proposals on other lands within settlements on their own merits having regard to the scale and character of the settlement, environmental considerations including the merits of the proposal in terms of sustainable travel outcomes, the availability of necessary infrastructure, compliance with Policy ED-P-10, and compatibility with the locality.~~

1b) To omit Policy ED-P-2(b): (~~text to be deleted in strikethrough~~)

- a. To direct development involving industrial buildings and/or industrial processes, and warehouse/storage use to appropriately zoned lands, or lands currently used for such purposes in Letterkenny, Growth Driver Settlements and Service Towns.
- ~~b. Determine such proposals on other lands within settlements on their own merits having regard to the scale and character of the settlement, environmental considerations including the merits of the proposal in terms of sustainable travel outcomes, the availability of necessary infrastructure, compliance with Policy ED-P-10, and compatibility with the locality.~~

(This is considered to be a material alteration).

BASICC DCDP-127

Express concerns re the 'sheer number of settlements proposed in the Draft Plan' and that 'these appear excessive and unsustainable'. Also suggest that a reconsideration be given to those settlements that don't meet the CSO population criteria so that investment can be allocated in the order of the settlement hierarchy and appropriate investment targeted to those towns and villages, where there is clear evidence that population trends indicate growth.

Chief Executive's Response:

The range of settlements identified in the hierarchy is a reflection of the geographical scale and diversity of the County. The settlement hierarchy contained in the Core Strategy is designed to recognise that there are differing levels of investments and interventions required.

Chief Executive's Recommendation 7.4:

No amendments required.

Failte Ireland DCDP-189

Notes that there are some references to Tourism in Chapter 7 but that: *'given its economic contribution to the Donegal economy that a greater consideration of it could be included in Chapter 7 and cross referenced to policies in an expanded Chapter 10'.*

Chief Executive's Response:

It is agreed that this importance of the tourism sector from an economic development perspective could be given stronger reference in the Economic Development chapter.

Chief Executive's Recommendation 7.5:

To insert additional narrative to strengthen the economic contribution of the tourism sector in Donegal.

(This is considered to be non-material and will be submitted to Members at a future Plenary meeting.)

Keep Ireland Open DCDP-231

This lengthy and detailed submission makes a multitude of policy proposals regarding the economic policies in the draft Plan and these are noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan seek to sustainably develop this key policy sector in the county

Chief Executive's Recommendation 7.6:

No change recommended.

Section 8: Infrastructure

Section 8.1 Transport

TEN-T: Donegal Priority Route Improvement Project (TEN-T PRIPD)

This is addressed in Section 11: Natural and Built Heritage due to most of the issues raised in relation to the TEN-T project refer to relevant natural and built heritage policy.

National Road Access/Policy T-P-12

OPR DCDP-211
TII DCDP-148
NTA DCDP-239
DHLGH DCDP-183
UE DCDP-138
<p>Sub-Sections (b) and (c)</p> <p>Collectively, these agencies express strong concerns over the wording of these sub-sections. For example, the OPR advises that:</p> <p>The Office notes that proposed Policy T-P-12 (b) and (c) seek to permit access to national roads for developments of national and regional strategic importance and for proposals for one off rural housing (section 8.1.3.1 also refers). This does not have regard to the provisions of sections 2.5 and 2.6 of the <i>Spatial Planning and National Roads Guidelines for Planning Authorities (2012)</i> (National Roads Guidelines). This is also inconsistent with NPO 74 and RPO 6.5, and is contrary to the national strategic outcome for enhanced regional accessibility, including maintaining the strategic capacity of the national road network. It also conflicts with proposed Objective T-O-10 of the draft Plan to safeguard the capacity and safety of national roads in accordance with the National Roads Guidelines. It will therefore be necessary to omit parts (b) and (c) of Policy T-P-12.</p> <p>For the same reasons, TII makes similar comments:</p> <p>'TII considers that the proposals included in Policy T-P-12 and the supporting text of Section 8.1.3.1 of the Draft Plan conflict directly with the provisions of official policy included in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).'</p> <p>In addition, TII advises that:</p> <p>'The latter is a concern as Donegal County Council has successfully overseen significant Exchequer investment in the route in order to improve safety levels for all road users and safeguard the routes strategic economic and 'lifeline' function. A critical measure associated with this expenditure has been to reduce the number of existing direct accesses to the improved sections of national road to increase road user safety. Developing a policy approach to allow access to such improved routes,</p>

albeit in exceptional circumstances, appears anomalous to the safety improvements made as well as undermining the significant State investment in improving the safety of the route that the Council has overseen.'

Sub-Sections (a)

The OPR specifically references sub-section (a) and comments that:

It is also considered necessary to amend Part (a) of Policy T-P-12 to clarify the position in relation to exceptional circumstances where development access to national roads may be considered.

OPR/TII Recommendations

The OPR recommends as follows. TII makes precisely the same recommendation:

the planning authority is required to:

- (i) omit Policy T-P-12 (b) and (c) and associated text in section 8.1.3.1;
- (ii) amend Policy T-P-12(a) as follows (deletions in red, additions in green):

*It is a policy of the Council not to permit developments requiring new accesses, or which would result in the **adverse** intensification of existing access points onto:*

i. National Roads where the speed limit is greater than 60 kph; or

ii. The section of the R238 Bridgend-Buncrana Regional Road where the speed limit is greater than 60 kph.

*Notwithstanding the foregoing, in exceptional circumstances, developments of national and regional strategic importance where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed may be considered, subject to such developments being **plan-led and** provided for through the Local Area Plan or Development Plan making process, including in consultation with the TII.*

Uisce Eireann Submission

The UE submission includes a request for a derogation from the standard national road access policy to facilitate projects that would require such access.

Chief Executive's Response:

It is acknowledged that this is a challenging issue for Council. It was for this reason that the internal National Road Access Implementation Group was set up as a vehicle to explore what flexibilities

might be achievable. The work of the Group concluded with the Executive recommending the identification of two stretches of the N56 that could be submitted to TII for consideration for derogation from national policy on the basis of the average annualised daily traffic counts being less than 3,000. Whilst this process was never fully closed out with TII, in any event Members resolved to include the more wide-ranging policy as contained in the Draft Plan and that is now the subject of such strong opposition from the agencies as referenced above.

It should be noted that dealing with the issue of the national policy preventing new access on to national roads outside of urban speed limits cannot and should not be left to the making of the CDP. Council has had a number of meetings on this topic including special meetings with our Oireachtas Members. It is recommended that that separate process should continue.

The recommendation below is made having regard to the rationale of the OPR and TII in terms of the significance of the divergence from national policy as currently drafted.

Regarding the request of UE, this matter was discussed with TII. TII advises that national policy should apply. Given that this approach would provide for consistency of application of the national policy approach, UE's request should not be agreed and therefore no recommendation is made in this regard.

Chief Executive's Recommendation 8.1.1:

To amend Policy T-P-12 as per the recommendations of the OPR.

(This is considered to be a material alteration)

Strategic Objective To Reflect Critical Strategic Importance of The National Road Network

TII DCDP-148

On the basis that 'the strategic national road network is critical to supporting and enhancing regional economic growth and providing regional accessibility to international gateways, would welcome an additional objective to reflect this criticality.

Chief Executive's Response:

The request is considered appropriate, and this is reflected in the recommendation below.

Chief Executive's Recommendation 8.1.2:

Insert additional Key Strategic Objective in Section 2.4:

'S-O-xx: To maintain the strategic function, capacity and safety of the national roads network, and to ensure that the existing extensive transport networks, discrete sections of which have been enhanced are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

(This is considered to be a material alteration.)

Update Of TEN-T and Other National Road Projects

An internal review of the Draft Plan's coverage of the TEN-T and other national roads projects has identified areas in which the policy framework could be strengthened. The recommendation below addresses these issues.

Chief Executive's Recommendation 8.1.3:

1) Amend Objective T-O-11 (new text in blue)

To deliver improvements to the Trans European Transport Network (TEN-T), (as required by EU Regulation (EU) No.1 58315/2013 "Guidelines for the development of the Trans European Transport Network as part of the core and comprehensive transport network of Ireland. In this regard it is a specific objective of the Council to:

- 1.a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).
- 1.b) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 8.1.4, 8.1.5, and 8.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.
2. Progress and ultimately carry out/implement the N13 Bridgend to County Boundary Route Improvement TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).
- 3) Reserve the preferred option corridors (to be determined) for the purposes of the project and the ancillary facilities to service same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.
- 4) Progress and ultimately carry out/implement further improvements to the TEN-T Comprehensive Network, Donegal, such as the N13 Stranorlar to Letterkenny and N13 Manorcuningham to Bridgend as one of critical strategic importance to Donegal, subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted). Reserve the preferred option corridors (to be determined) for the purposes of the projects and the ancillary facilities to service same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.

(This is considered to be a material alteration.)

2) Amend Policy T-P-10 (new text in blue)

It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network (Map 8.1.1 refers) within Donegal in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:

- a. Progress and implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals and the terms and conditions of any such approvals (if granted).
- b. Reserve the preferred route corridors and the ancillary facilities of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 8.1.4, 8.1.5, and 8.1.6 and not to permit other development within those corridors where such development may prejudice the implementation of the project.
- c. Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within lands zoned:
 - i. TEN-T PRIPD/Established Development
 - ii. TEN-T PRIPD/Amenity.
- d. Progress and ultimately implement the N13 Bridgend to County Boundary TEN-T Priority Route Improvement Project as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).
- e. Progress and ultimately carry out/implement further improvements to the TEN-T Comprehensive Network, Donegal, such as the N13 Stranorlar to Letterkenny and N13 Manorcunningham to Bridgend as one of critical strategic importance to Donegal, subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted). Reserve the preferred option corridors (to be determined) for the purposes of the projects and the ancillary facilities to service same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.

(This is considered to be a material alteration.)

3) Amend Table 8.1B: Transportation Improvement Projects (table in Draft Plan inserted below for ease of reference)

- a) Under 'Other TEN-T Projects' add:
 - N13 Stranorlar to Lifford; and
 - N13 Manorcunningham to Bridgend

b) Under 'National':

- after 'N15 Lifford to Ballybofey/Stranorlar' add '... 'and other sections of the N15 including Corcam Bends.'; and
- after 'N56 Mountcharles to Inver' add ... 'and other sections of the N56 including N56 Doonwell to Drumbrick and N56 Gortahork to Falcarragh.'

Table 8.1B: Key Transportation Improvement Projects.

PROJECT	MAP REFERENCE
TEN-T PRIORITY ROUTE IMPROVEMENT PROJECT, DONEGAL	
N14 Manorcunningham to Lifford / Strabane / A5 Link.	Map 8.1.4
N15/N13 Ballybofey / Stranorlar Urban Region	Map 8.1.5
N56/N13 Letterkenny to Manorcunningham	Map 8.1.6
Other TEN-T Projects	
N13 Bridgend to County Boundary route improvement Project	NOT MAPPED
NATIONAL	
N15 Lifford to Ballybofey/Stranorlar	Map 8.1.7
N56 Mountcharles to Inver	Map 8.1.8
N56 An Clochan Liath (Dungloe) to Glenties	Map 8.1.9
N56 Inver to Killybegs	Map 8.1.10
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

(This is considered to be non-material.)

Electricity Transmission Networks Along National Road (Policy E-P-6 refers)

TII DCDP-148

DECC DCDP-265

ESB DCDP-141

In essence, there is a difference of opinion between TII and ESB regarding whether power lines/grid connections should be accommodated along national road corridors. TII seek to resist such development unless all other options have been exhausted. Indeed, the inclusion of this comment in TII's pre-draft submission is the reason that such policy was included in the Draft Plan in the first place. In contrast, the ESB expresses concern as the policy would 'potentially restrict the consideration of all options before the details and specific circumstances of individual projects have been considered and therefore may prevent implementation of the optimum solution.

The DECC submission provides clarity on the matter from DECC's viewpoint. Thus, DECC advises that:

The Department notes that policy E-P-6 conflicts with government policy as set out in CAP 2023, which states

'Enable the use of the public road and potentially the rail networks for routing of new public and private electricity circuits'¹

The Local Authority is requested to update Policy E-P-6 to reflect government policy to utilise the road network for electricity infrastructure (CAP 2023, section 12.3.1). The Department also recommends the following proposed alternative wording for consideration:

'It is a policy of the Council that when designing, planning, and consenting for new electricity grid infrastructure, opportunities to use the existing roads and rail network for such development shall be considered and supported where possible.

Chief Executive's Response:

The clarification provided by the DECC is reflected in the recommendation below. Nb. Policy WE-P-8 is a duplicate of Policy E-P-6. Therefore, the recommendation also addresses that policy.

Chief Executive's Recommendation 8.1.4:

1a) Delete existing Policy E-P-6:

~~It is a policy of the Council that proposals for grid connections shall be considered along the national road network only after other potential alternative routes have been reasonably eliminated for reasons of environmental sensitivities.~~

1b) Delete existing Policy WE-P-8:

~~To require that proposals for grid connections shall be considered along the national road network only after other potential alternative routes have been reasonably eliminated for reasons of environmental sensitivities.~~

and

1b) Insert new Policy E-P-xx:

It is a policy of the Council that when designing, planning, and consenting for new electricity grid infrastructure, opportunities to use the existing roads and rail network for such development will be considered in accordance with the protocols that have been recently developed between ESB/Eirgrid, TII, DECC/DOT and Local Authorities.

(This is considered to be a material alteration.)

National Roads and Filling Stations

TII DCDP-148
'Would welcome' a new policy to reference the explicit presumption against large out-of-town retail centres located adjacent or close to existing, new or planned national roads reflecting policy outlined in the Retail Planning Guidelines, 2012.
<p>Chief Executive's Response:</p> <p>Given the national policy reference, this request is considered appropriate, and this is reflected in the recommendation below.</p>
<p>Chief Executive's Recommendation 8.1.5:</p> <p>Insert additional policy in Section 7.4:</p> <p>T-P-xx: Large out-of-town retail centres shall generally not be supported where they would be located adjacent or close to existing, new or planned national roads.</p> <p>(This is considered to be a material alteration.)</p>

Bypasses/Relief Roads

OPR DCDP-211
NTA DCDP-239
<p>Both submissions question the appropriateness of the non-national road bypasses/relief roads identified in the Plan (ie. those for the Bunrana Inner and Outer Relief Road; Muff Bypass, Ballybofey Link Road; Burnfoot Bypass; Killybegs Outer Relief Road in the context of national climate change-related policy. In this regard the OPR advises as follows:</p> <p>'However, the draft Plan still retains a strong focus on road-based activity and proposed road schemes, such as relief roads and bypasses in Bunrana, Muff, Ballybofey-Stranorlar, Burnfoot and Killybegs. This approach is at odds with the current transport policy under the NSMP, with the Climate Action Plan, and with the four transport investment priorities under the National Investment Framework for Transport in Ireland(2021),in response to climate change targets under the Climate Action and Low Carbon Development Act 2015, as amended. It is also inconsistent with the mandatory objectives for the promotion of sustainable settlement and transport strategies. It will therefore be necessary for the planning authority to reconsider the inclusion of these road schemes.'</p> <p>As a result, the OPR makes the following recommendation:</p> <p>(iii) omit the proposed relief roads and bypasses for the towns of Bunrana, Muff, Ballybofey, Burnfoot and Killybegs, unless they can be justified having regard to the current national transport and climate action policy context, on an appropriate evidence-basis;</p>

Chief Executive's Response:

The core objectives of current national policy have compact growth and development together with sustainable travel alternatives at the forefront. The proposed bypasses/relief roads are central to achieving these objectives by removing strategic traffic from the town centre. This will allow these towns to sustainably grow and develop, while also improving their ambience, vibrancy and placemaking. Removal of strategic traffic 'reclaims' this road space for use in a more sustainable way, enabling and encouraging a greater uptake to lower carbon alternatives such as public transport, walking and cycling while also enhancing public transport efficiency and reliability. The absence of rail to and within Co. Donegal significantly reduces the sustainable alternatives for the transport of people and goods. Even with the recently published Draft All Island Strategic Rail Review, the projection for rail within the County is long-term (circa 2050), and is subject to environmental, funding and other planning considerations. However, proposed rail provision, as currently set out within the Draft AISRR will not serve any of the settlements noted. In fact, the Review recommends that this 'gap' is filled by a 'high frequency integrated public bus service'. This therefore must be supported by a fit for purpose, uncongested road based public transport network. Co. Donegal has suffered a lack of investment in transport infrastructure across many decades. It is therefore not appropriate to align the infrastructure requirements of Co. Donegal to other regions throughout Ireland where extensive development has taken place. Such a situation is recognised in the National Investment Framework for Transport Ireland (2021) which states:

'In some cases, it will not be possible to meet infrastructure needs via the higher tiers of the (intervention) Hierarchies. For example, significant investment in new and expanded public transport is needed to enable sustainable urban mobility, while targeted bypasses and completing missing links can bring substantial network benefits and make sustainable mobility more viable. More generally, investment will be priorities-led and needs-based, and where Investment Priorities cannot be addressed by maintaining or optimising existing infrastructure, appropriate improved and new infrastructure will continue to be part of future investment plans.'

These considerations can be further illustrated by an examination of the following 'case studies'.

Muff Bypass: Muff is a small town, straddling the border with Northern Ireland. This small town is currently a key gateway from the Inishowen Peninsula (Co. Donegal) to Derry City. Derry City forms part of the North West City Region comprising Derry-Letterkenny-Strabane. It is the fourth largest agglomeration on the island of Ireland, with a population catchment of 350,000 residents within the surrounding environs (including the village of Muff). The Inishowen Peninsula is the largest peninsula in Ireland, serving a population of 40,000 people. Derry City, being the largest urban centre, is a core employment centre for this part of Donegal. Muff also serves as a core road-based connection between Foyle Port in Derry and Greencastle harbour (north Donegal). As such, the existing cross-border crossing between Muff (Ireland) and Derry City (NI) is the one of the busiest cross-border routes in the county, with an AADT of XXXX. Such volumes are in line with the National Primary networks throughout the county. These volumes are not sustainable, and the small village of Muff is well beyond capacity, significantly impacting the village centre environment. A road-based bypass is the only viable solution to remove strategic, cross-border and industry related traffic from this small village so that this space can become safe, vibrant and attractive.

Chief Executive's Recommendation 8.1.6:

No change recommended on foot of the above.

Sustainable Modes

NTA DCDP-239
Makes three specific recommendations to either amend existing or insert new objectives/policies.
<p>Chief Executive’s Response:</p> <p>Given the national policy agenda of encouraging an increase in sustainable modes usage, these requests are considered appropriate, and this is reflected in the recommendation below.</p>
<p>Chief Executive’s Recommendation 8.1.7:</p> <p>1) Amend Objective T-O-2 (new text in blue)</p> <p>T-O-2 To secure the development of strategic, coherent and high-quality walking and cycling networks that are integrated with public transport and connected with cultural, recreational, commercial, educational and employment destinations and attractions consistent with the National Outdoor Recreation Strategy, 2023-2027, the Donegal Outdoor Recreation Strategy, and the Donegal networks as identified in the Cycle Connects: Ireland’s Cycle Network Plan and as developed through the Local Transport Plan process.</p> <p>(This is considered to be non-material.)</p> <p>2) Insert new policy:</p> <p>T-P-xx: To require new developments, as appropriate, include a street network (including links through open spaces) based on the concept of Filtered Permeability, whereby a permeable and legible urban environment is created for pedestrians, cyclists, and where applicable public transport vehicles, optimising movement for these modes while managing movement by private car to prevent through traffic.</p> <p>(This is considered to be a material alteration.)</p> <p>3) Amend Policy T-P-2 (new text in blue):</p> <p>T-P-2 To apply the principles of the National Transport Authority’s (NTA) ‘Area Based Transport Assessment’ guidance, in consultation with the NTA, in the preparation of Local Transport Plans to accompany Local Area Plans as well as detailed Urban Plans. The ABTA approach will also be applied to Settlement Framework-type plans where relevant.</p> <p>(This is considered to be non-material.)</p>

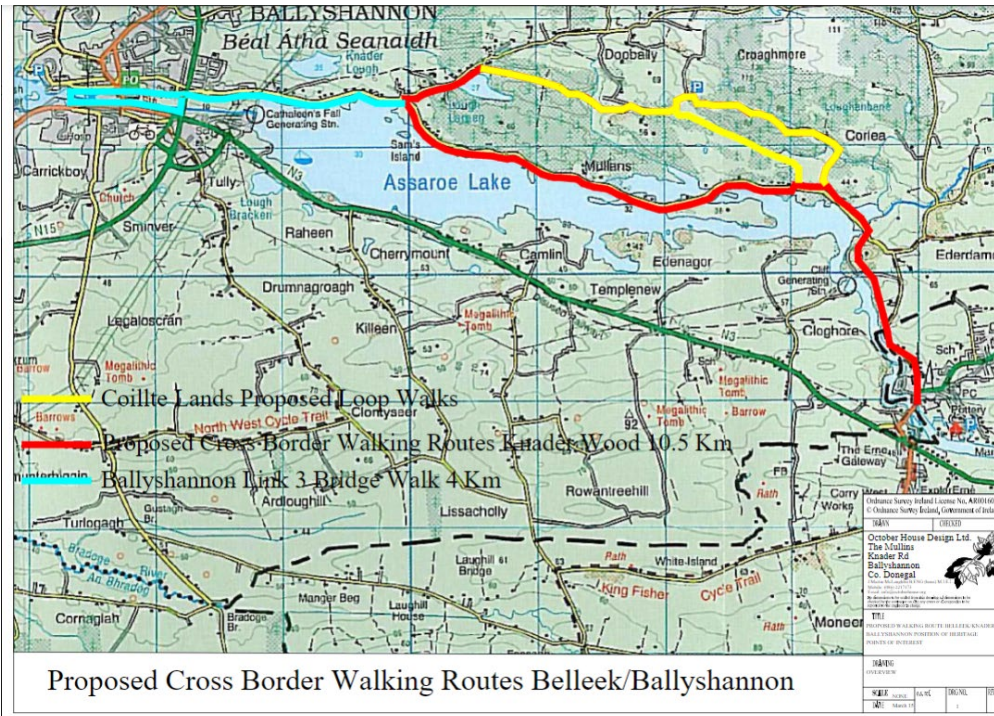
Greenways/Strategic Active Travel Projects

Erne Enterprise DCDP-106
Cllr. B. Sweeney DCDP-215
Rob Casey DCDP-10
Erne Atlantic Way Community Group DCDP-43
Libby Duffy DCDP-45
Valerie McNulty, Erne Atlantic Way Community Group DCDP-47

Maura Gallagher, Erne Atlantic Way Community Group DCDP-50

Miriam Ryan DCDP-230

Erne Enterprise makes the case for the identification in the Plan of a regionally important walking trail between Ballyshannon & Belleek' and express concern that omission from the Plan would prejudice the securing of funding for it. Refers to its involvement, in conjunction with Donegal County Council & Fermanagh and Omagh District Councils, in the commission of a feasibility study. Further advises that the two Councils 'are currently meant to be addressing issues regarding the identification of a source of funding for the project', and their understanding that an ongoing Shared Island Consultation is considering the development of the project with a route roughly based on a submitted map' – see below.



Note that the project had been mentioned under the previous development plan and would view the omission of the project from being specifically mentioned in the new plan would as a backwards step and a hinderance to a project.

Request that the development of the walking trail be added to the Strategic Greenways Section of the plan but also note that there is scope for major infrastructural projects comprising of walkways that will not technically fall under the strict Greenway standards and the terminology used to describe that section could be broadened slightly.

Cllr. B. Sweeney's submission effectively makes the same point.

Chief Executive's Response:

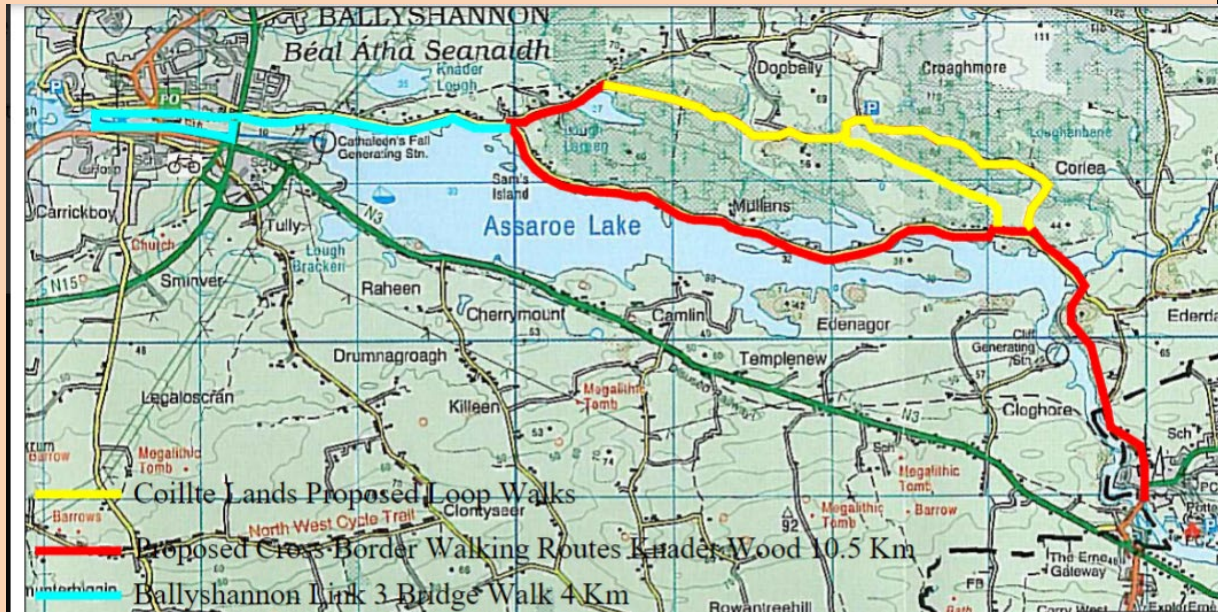
Whilst the delivery of such projects presents significant challenges in terms of resources and funding, the potential significance of the Ballyshannon to Belleek project is acknowledged and this is reflected in the recommendation below.

Chief Executive's Recommendation 8.1.8:

Insert new Section:

8.1.4.2 Strategic Cross-Border Active Travel Opportunity

Donegal County Council & Fermanagh and Omagh District Council and Erne Enterprise have identified an active travel/tourism route linking Ballyshannon with Belleek as a route of potential regional significance. The broad areas of the routes are identified on the map below:



This Plan supports the principle of such a development.

Policy T-P-xx: To support the principle of the development of an active travel link between linking Ballyshannon and Belleek.

(This is considered to be a material alteration.)

Miscellaneous Policy requests of TII.

Objective/Policy	Proposed Amendment	Rationale
<p>T-P-15: 'To implement the recommendations in the Design Manual for Urban Roads and Streets (DMURS), (Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government) in relation to urban streets and roads in the 50/60 kph zone.'</p>	<p>The incorporation of reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'.</p>	<p>In the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads, complementary to DMURS principles.</p>

Chief Executive's Response: Agreed.

Chief Executive's Recommendation 8.1.9:

Add the referenced amendment.

(This is considered to be non-material.)

ISSUE	Rationale
<p>Would welcome consideration by the Council of the inclusion of a new Objective included in the Development Plan outlining that; <i>'The capacity and efficiency of the national road network drainage regimes in County Donegal will be safeguarded for national road drainage purposes'</i></p>	<p>National road surface water drainage regimes are constructed with the objective of disposing of national road surface water, it is important that capacity in the drainage regime is retained to address this function.</p>
<p>Chief Executive's Response: Agreed.</p>	
<p>Chief Executive's Recommendation 8.1.10:</p> <p>Insert new objective: <i>'To safeguard the capacity and efficiency of the national road network drainage system for national road drainage purposes'</i></p> <p>(This is considered to be a material alteration.)</p>	

ISSUE	Rationale
<p>Would welcome consideration by the Council that applications for Solar Farm developments should be accompanied by glint and glare assessments.</p>	<p>In TII's experience, the dispersed nature of renewable energy resources generally has the potential to result in interactions, to varying degrees, with the strategic national road network that require careful consideration and management. In accordance with the NPF NSO 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the NDP, the National Investment Framework for Transport in Ireland, and also the Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.</p>
<p>Chief Executive's Response: Agreed.</p>	
<p>Chief Executive's Recommendation 8.1.11: Amend existing Policy E-P-2 (new text in blue):</p> <p>It is a policy of the Council:</p> <ol style="list-style-type: none"> to facilitate the appropriate development of renewable energy and energystorage projects arising from a variety of sources, including hydro power, oceanenergy, hydrogen, bioenergy, biomass, solar, wind, district heating systems and geo-thermal and the storage of water as a renewable kinetic energy resource, in accordance with all relevant material considerations and the proper planning and sustainable development of the area; not to support the process of Hydraulic Fracturing (or fracking); <i>applications for Solar Farm developments should be accompanied by glint and glare assessments.</i> <p>(This is considered to be non-material.)</p>	

ISSUE

The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) relating to development proposals with implications for the national road network.

Chief Executive's Response: Agreed.

Chief Executive's Recommendation 8.1.12:**1.** Insert new Policy (new text in blue):

For developments affecting the national road network it is a policy of the Council to require the provision of Traffic and Transport Assessments in accordance with the requirements of the 'TII Traffic & Transport Assessment Guidelines (2014)' (refer to 'Requirement for Safety Audit', Chapter 16, 'Technical Standards').

2. Insert the following in 'Requirement for Safety Audit', Chapter 16, 'Technical Standards'

For developments affecting the national road network, a Traffic and Transport Assessment will be required in accordance with the requirements of the 'TII Traffic & Transport Assessment Guidelines (2014)' as set out below:

Table 2.2 Advisory Thresholds for Traffic and Transport Assessment Where National Roads are Affected

Vehicle Movements	100 trips in / out combined in the peak hours for the proposed development	
	Development traffic exceeds 10% of turning movements at junctions with and on National Roads.	
	Development traffic exceeds 5% of turning movements at junctions with National Roads if location has potential to become congested or sensitive.	
Size	Retail	1,000m ² Gross Floor Area.
	Leisure facilities including hotels, conference centres and cinemas.	1,000m ² Gross Floor Area.
	Business	2,500m ² Gross Floor Area.
	Industry	5,000m ² Gross Floor Area.
	Distribution and warehousing	10,000m ² Gross Floor Area.
	Hospitals and education facilities	2,500m ² Gross Floor Area.
	Stadia	1,500 person capacity.
	Community Facilities including places of worship, community centres.	1,000m ² Gross Floor Area.
	Housing	50 dwellings within urban areas with a population less than 30,000. 100 dwellings within urban areas with a population equal to or greater than 30,000.
Parking Provided	100 on-site parking spaces.	

Table 2.3 Sub-threshold Criteria for Traffic and Transport Assessment

Vehicle Movements	The character and total number of trips in / out combined per day are such that as to cause concern.
Location	The site is not consistent with national guidance or local plan policy or accessibility criteria contained in the Development Plan.
Other Considerations	The development is part of incremental development that will have significant transport implications.
	The development may generate traffic at peak times in a heavily trafficked/ congested area or near a junction with a main traffic route.
	The development may generate traffic, particularly heavy vehicles in a residential area.
	There are concerns over the development's potential effects on road safety.
	The development is in a tourist area with potential to cause congestion.
	The planning authority considers that the proposal will result in a material change in trips patterns or raises other significant transport implications.

(This is considered to be a material alteration.)

ISSUE

All references related to the NRA should be updated to TII.

The NRA DMRB has been superseded and all relevant design standards for national roads are now included in TII Publications. All references related to the NRA DMRB should be updated to TII Publications.

Chief Executive's Response: Agreed.

Chief Executive's Recommendation 8.1.13:

Insert non-material amendments per TII request.

ISSUE

Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. TII has also issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). It is noted that neither document appears to be referenced or reflected in the policies and provisions of the Draft Plan.

TII requests the incorporation of the provisions of the TII Policy and the DoECLG Guidelines into the new Development Plan.

Chief Executive's Response: Agreed.

Chief Executive's Recommendation 8.1.14:

1. Insert new Policy (new text in blue):

It is a policy of the Council to control the proliferation of non-road traffic signage on and adjacent to national roads in accordance with Section 3.8 of the DoECLG 'Spatial Planning

and National Roads Guidelines' and TII's 'Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011)'.

(This is considered to be a material alteration.)

ISSUE

Government policy (policy not specified) requires that development proposals identify and implement noise mitigation measures, where warranted, for noise sensitive development proposed in the vicinity of existing or proposed national roads. Not reflected in the Draft Plan.

TII considers that this issue should be referenced.

Chief Executive's Response: Agreed.

Chief Executive's Recommendation 8.1.15:

1. Insert new Policy (new text in blue):

It is a policy of the Council to require that development proposals in the vicinity of existing or proposed national roads shall include the identification of noise mitigation measures, where warranted. Such required measures shall be implemented by the developer.

(This is considered to be a material alteration.)

Section 8.2 Water and Wastewater Infrastructure

Uisce Éireann (UE) DCDP-138

The submission contains substantive commentary in relation to the Core Strategy and the Town Plans for Buncrana, Ballybofey/Stranorlar and Bundoran. These are addressed in the relevant sections of this Report. UE also requests derogations from national road access policy. This is addressed in Section 8.1 of this Report.

Section 2 of the submission makes a range of comments/observations that are largely non-material in nature (eg. requesting updated narrative re Irish Water becoming known as Uisce Éireann and assuming full responsibility for the delivery of all public water services in Donegal in September, 2022; updated factual information re the status of various projects etc.).

Two more material matters are also raised in Section 2.

Firstly, UE refers to various policies providing conditional support for wastewater treatment systems. UE advises that: *Uisce Éireann will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.*; and that: *The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.*

Secondly, UE refers to Policy WE-P-3(j.) and seeks an amendment to it.

Chief Executive's Response:

The non-material matters are noted, as are UE's comments regarding wastewater treatment plants.

With regards to the requested policy amendment, this is agreed and addressed in the recommendation below.

Chief Executive's Recommendation 8.2.1:

Insert amendment to Policy WE-P-3(j.) (existing text in black; **new text in blue**)

WE-P-3:

To ensure that the assessment of wind energy development proposals will have regard to the following:

- a. sensitivities of the county's landscapes;
- b. visual impact on protected views, prospects, designated landscapes, as well as local visual impacts;
- c. impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes;
- d. local environmental impacts, including those on residential properties, such as noise, shadow flicker and over-dominance;
- e. visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network;
- f. scale, size and layout of the project and any cumulative effects due to other projects;
- g. the impact of the proposed development on protected bird and mammal species;
- h. the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines (or as may be amended).
- i. 'The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)'; and
- j. the protection of drinking water sources **and public water services infrastructure.**

(This is considered to be a material alteration.)

Irish Farmers Association Aquaculture submission DCDP-186**Submission Summary**

In relation to Wastewater related issues said submission states that the EU Water Framework Directive requires the designation of shellfish waters which must comply with physical, chemical, and microbiological requirements, and are subject to pollution reductions programmes. It opines that mismanagement has compromised water quality in shellfish producing bays across the county and adequate funding must be made available to ensure tertiary WWTP treatment in shellfish bays.

States that Shellfish are filter feeders, all planning officers should be familiar with the importance of water quality in relation to aquaculture when examining developments close to shellfish bays and water sampling should be considered as a planning condition requirement

Chief Executive Response

The improvement of water quality in WFD designated Shellfish Water is an important priority for the plan. This priority is articulated through objective WW-O-1 of the plan which aims to maintain, improve and enhance the quality of surface and ground waters in accordance with inter alia EU Water Framework Directive (WFD). In turn this objective is given effect through inter alia: policy WW-P-1 which supports the provision of new, and the upgrading of existing, water and wastewater infrastructure in collaboration with Uisce Eireann, WW-P-2 which ensures that new developments do not... hinder the achievement of the WFD, WW-P-4 which requires confirmation from Uisce Eireann that the wastewater system in the area has treatment capacity to serve the development and WW-P-5/6 which require compliance with EPA Code of Practices in relation to the provision of individual effluent treatment systems. Otherwise, the monitoring of effluent treatment systems or effluent discharge licences is regulated by environmental legislation and thus lies outside the scope of the planning system.

Having regard to the above, no amendments recommended.

Section 8.3 Telecoms

Department of the Environment, Climate and Communications DCDP-265

Requests inclusion of reference to the Government's 'Harnessing Digital-The Digital Ireland Framework' *'to drive and enable the digital transition across the Irish economy and society.'*

Also requests inclusion of reference to National Strategic Objective 6 of the NDP:

NSO 6 - High Quality International Connectivity

- Completion of new parallel runway for Dublin Airport
- Completion of investments at Dublin Port, the Port of Cork and Shannon Foynes Port
- Dublin Port MP2 Project – two new berths



(nb. whilst the NSO does not reference telecoms connectivity, the issue is addressed in the relevant detailed chapter, Chapter 11.)

Finally, also suggests that national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland's national and international connectivity outlined in the above-noted documents could be supported by the Authority via specific reference to these in the Development Plan. Concludes by advising that 'a direct callout of supporting 5G rollout would be welcome from a DECC perspective.

Chief Executive's Response:

Whilst the Draft Plan chapter does reference the National Broadband Plan, it is agreed that the chapter does not fully align with national policy. The recommendation below addresses these inconsistencies.

Chief Executive's Recommendation 8.3.1:

- 1) Amend Section 8.3.1 header and insert new text immediately before existing text: (~~text to be deleted in strikethrough~~; **new text in blue**)

8.3.1 ~~The National Broadband Plan~~ National Policy Perspective

National policy is clearly identified in: National Strategic Outcome 6 of the National Development Plan (NDP) and subsequent narrative in the associated Chapter 11 of the NDP; and the Government's 'Harnessing Digital-The Digital Ireland Framework' the purpose of which is described by the Department of the Environment, Climate and Communications as being 'to drive and enable the digital transition across the Irish economy and society.'

- 2) Amend Objective TC-O-1 (**new text in blue**)

To facilitate the development and delivery of a sustainable telecommunications network across the County through a range of telecommunication systems including **those arising out of: National Strategic Outcome 6 of the National Development Plan (NDP); the Government's 'Harnessing Digital-The Digital Ireland Framework'; and the National Broadband Plan, the National subvention plan to deliver High Speed Broadband to every rural household outside the commercially served areas as defined on the National Broadband Plan Map, subject to having due regard to natural and built heritage and to environmental considerations.**

(This is considered to be a material alteration.)

Keep Ireland Open DCDP-231

This lengthy submission makes a multitude of policy proposals regarding telecommunications infrastructure and these are noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan, are robust and seek to sustainably develop this key infrastructural sector in the county

Chief Executive's Recommendation: 8.3:2

No change recommended.

Section 8.4 Flood Risk and Surface Water Management

OPR DCDP-211

OPW DCDP-128

OPR 'welcomes the preparation' of the Strategic Flood Risk Assessment (SFRA) in accordance with national policy and Guidelines. Notwithstanding, the OPR and the OPW identify issues requiring further consideration for the Buncrana, Ballybofey/Stranorlar and Bundoran town plans, and the settlement frameworks. These issues are addressed as follows:

Specifically Identified Sites

Site specific issues identified by the OPR and OPW are addressed as follows:

- OPR recommendation 16(i.)(a)-(g) in respect of specific sites in the Buncrana, Ballybofey/Stranorlar and Bundoran Town Plans is addressed in Sections 18, 19 and 20 respectively of this Report; and
- OPR recommendation 16(i.)(h) in respect of 'opportunity sites' within settlement frameworks is addressed in the Settlement Frameworks section.

Existing Developed Areas

The following are addressed in this section of the Report:

- OPR recommendation 16(iii.) re 'existing developed areas' and overlaying flood zone maps with the land use zoning maps, and the OPW recommendation in respect of zonings not within or adjoining the urban cores of Buncrana, Ballybofey/Stranorlar and Bundoran; and
- OPR recommendation 16((iii) re overlaying flood zone maps with settlement framework maps.

Existing Developed Areas

The OPR advises as follows:

For existing development, when avoidance or substitution is not possible and all criteria cannot be satisfied, a policy should be included to limit development to minor extensions only in accordance with section 5.28 of the Flood Guidelines and limit new development accordingly.

The OPW effectively raises the same issue when they identify significant areas of 'Established Development' and 'Rural/Agricultural' zoned lands impacted by Flood Risk A and Flood Risk B.

OPR recommendation 16(ii.) refers to section 5.28 of the Flood Guidelines and the provision therein that for existing developed areas, when avoidance or substitution is not possible and all criteria cannot be satisfied, a policy should be included to limit development to minor extensions only in accordance with and limit new development accordingly.

Buncrana, Ballybofey/Stranorlar and Bundoran Zoning Maps

As requested by the OPR, the flood risk maps have been overlaid onto the zoning maps. These maps are attached to this Report. It can be seen that there are significant areas of flood risk areas overlapping with both 'Established Development' and 'Rural/Agricultural' zones.

Settlement Frameworks

The SFRA has identified a flood risk for many of our settlements. In most cases these areas are small in scale and/or on the periphery of the settlement. The flood zones overlaid on settlement

frameworks can be viewed at the following link: [Settlement Frameworks with High-End Future Flooding Scenario Analysis \(arcgis.com\)](https://arcgis.com)

Given this evidence for the Town Plan and Settlement Frameworks, it is acknowledged that the Draft Plan is inconsistent with national guidelines. The Guidelines provide that within such areas, only applications for minor developments, such as small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises should be considered. This is on the basis that they are unlikely to raise significant flooding issues, unless they obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substances. This is addressed in the recommendation below.

Chief Executive's Recommendation 8.4.1:

Re 'Established Development' Areas

- 1) Amend the Buncrana, Ballybofey/Stranorlar and Bundoran Town Plan zoning maps by disaggregating the 'Established Development' zones into 'Established Development 1' (ie. those without identified flood risk) and 'Established Development 2' (ie. those with identified flood risk);
- 2) Amend Table 17.1 'Land Use Zoning Objectives' by:
 - a. disaggregating the 'Established Development' entry into 'Established Development 1' (ie. those without identified flood risk) and 'Established Development 2' (ie. those with identified flood risk) as follows (existing text in black; **new text in blue**):

Established Development 1	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.
Established Development 2	To conserve and enhance the quality and character of the area, to protect residential amenity and only support applications for minor developments, such as small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises.

- 3) Insert new policy in Chapter 8.4: 'Flooding', together with supporting narrative:

Policy F-P-xx:

- a. Within areas zoned as 'Established Development 2', minor development only (eg. small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises) will be supported where it can be demonstrated that they will not obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substance).
- b. Such applications shall be accompanied by a commensurate assessment of the risks of flooding to demonstrate that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. Such proposals

shall follow best practice in the management of health and safety for users and residents of the proposal.

Rural/Agricultural Areas

- 1) Amend the Buncrana, Ballybofey/Stranorlar and Bundoran Town Plan zoning maps by disaggregating the 'Rura/Agricultural' zones into 'Rural/Agricultural 1' (ie. those without identified flood risk) and 'Rural/Agricultural 2' (ie. those with identified flood risk).
- 2) Amend Table 17.1 'Land Use Zoning Objectives' by:
 - a. disaggregating the 'Rura/Agricultural' entry into 'Rural/Agricultural 1' (ie. those without identified flood risk) and 'Rural/Agricultural 2' (ie. those with identified flood risk) as follows (existing text in black; new text in blue):

Rural/Agricultural 1	Protect and improve rural amenity and provide for the development of agriculture.
Rural/Agricultural 2	Protect and improve rural amenity and only support applications for minor agricultural, residential and commercial developments, such as small extensions to existing buildings.

- 3) Insert new policy in Chapter 8.4: 'Flooding', together with supporting narrative:

Policy F-P-xx:

- a. Within areas zoned as 'Rural Agricultural 2', minor developments only (eg. small extensions to existing agricultural, residential or commercial buildings) will be supported where it can be demonstrated that they will not obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substance).
- b. Such applications shall be accompanied by a commensurate assessment of the risks of flooding to demonstrate that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. Such proposals shall follow best practice in the management of health and safety for users and residents of the proposal.

(This is considered to be a material alteration.)

Management of Sewer Networks

Some of our sewer collection networks are under pressure because of the legacy of rain/surface water being allowed to drain to them. This practice is no longer sustainable and is addressed in the recommendation below.

Chief Executive's Recommendation 8.4.2:

Insert additional policy at existing Policy F-P-2 (new text in blue):

- a) To require the use of Sustainable Urban Drainage Systems (SUDs) including flood attenuation areas, wetlands, the controlled release of surface waters and use of open spaces and semi-permeable hard surfaces for urban development proposals.
- b) Support the removal of existing stormwater discharging to combined (foul and storm) sewers using nature-based solutions.
- c) Not to support the discharge of additional surface water to combined sewers.

(This is considered to be a material alteration.)

Section 8.5 Electricity Transmission and Gas Networks

ESB DCDP-141

ESB 'broadly supports the vision included in Draft CDP, and mitigating the impacts of, and adapting to, climate change is one of the key challenges identified in the document'.

Advises that: 'Among the most critical measures in the Government's Climate Action Plan is that 80% of electricity will be generated by a mix of 5 GW offshore wind, 8 GW onshore wind and 1.5 -2.5 GW from solar PV. Energy storage systems and landside developments for offshore wind and an enhanced electricity Transmission and Distribution Grid are essential to achieving these targets. It represents a significant change for the electricity industry and ESB is committed to doing its part in supporting and delivering on the Government's energy policy.'

In this context, ESB welcomes Strategic Objective 2 and Policy E-P-1 in Chapter 9: Natural Resources. Finally, the ESB also notes Objective ETN-O-1 in the subject Chapter. The refe

S-O-4

To support the development and implementation of a sustainable economic model for County Donegal embracing growth in areas such as innovation, research and development, rural diversification, tourism initiatives, energy advances and the promotion of sustainable start up enterprises as an integral component of accelerating socio-economic growth throughout the County and in a Regional, Cross Border and National context.

E-P-1

It is policy of the Council to facilitate the development of grid reinforcements including grid connections and transboundary energy network (electricity and gas) into and through the County, within the Region, and to support the development of cross border grid connections, subject to other objectives and policies of this Plan.

ETN-O-1

To secure the upgrade of the electricity distribution network serving the County to a minimum 220kv distribution network.

Nb. The ESB also expresses concerns regarding Policies E-P5 and E-P-6 in Chapter 9 Renewable Energy. These comments are addressed in Section 9 of this Report.

Chief Executive's Response:

The ESB's comments are noted and no amendments are recommended.

DECC DCDP-265

ESB DCDP-141

The Dept. comments on Objective ETN-O-1. Advise of concerns that it may be overly restrictive in the sense that it could be interpreted as supporting only grid upgrades of a minimum of 220kv with the result that 'lesser' network upgrades such as the 110kv network would not be supported. Propose alternative wording.

ESB notes ETN-O-1.

Chief Executive's Response:

The intent of the wording of ETN-O-1 is not to restrict the provision or upgrade of 110kv transmission networks. The recommendation below provides clarity on this matter.

Chief Executive's Recommendation 8.4.3:

Amend Objective ETN-O-1 as below (~~text to be deleted in strikethrough~~) (new text in blue)

To secure the ~~upgrade~~ **strengthening** of the electricity ~~distribution~~ **grid to include the provision of network serving the County to a minimum 220kv distribution** **transmission networks to enable the harnessing and distribution of energy.**

(This is considered to be a material alteration.)

ESB DCDP-141

Refers to its ownership and operation of three hydro-electric power stations in County Donegal, two on the river Erne (Cathleen's Fall and Cliff) and one on the river Clady (Clady) with a combined generating capacity of 69 MW, and that they constitute a long established, sustainable source of energy for the county and the national network. Advise that the ongoing need for curtilage management and the restriction of lands uses, which might affect the ability to consolidate and/or expand operations at these locations is essential as they are of strategic national importance in terms of electricity supply and are an integral part of our fight against climate change and reducing greenhouse gas emissions.

Chief Executive's Response:

In the context of the national and regional climate change policy agenda, the comments are noted and agreed. This is reflected in the recommendation below.

Chief Executive's Recommendation 8.4.4:**Insert new narrative and Policy as below:**

There are three strategically important hydro-electric installations in County Donegal, two on the river Erne (Cathleen's Fall and Cliff) and one on the river Clady (Clady) with a combined generating capacity of 69 MW. These facilities constitute a long-established, sustainable source of energy for the county and the national network. As such there is an ongoing need for curtilage management and the restriction of incompatible lands uses, which might affect the ability to consolidate and/or expand operations at these locations. This approach is essential given that they are of strategic national importance in terms of electricity supply and are an integral part of the climate change and reduction of greenhouse gas emissions agenda.

Policy ETN-P-1: To protect the three hydro-electric power stations in County Donegal, two on the river Erne (Cathleen's Fall and Cliff) and one on the river Clady (Clady) by restricting incompatible lands uses which might affect the ability of these facilities to consolidate and/or expand operations at these locations.

(This is considered a material alteration.)

Keep Ireland Open DCDP-231

This lengthy submission makes a multitude of policy proposals regarding electricity infrastructure and these are noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan seek to sustainably develop this key infrastructural sector in the county

Chief Executive's Recommendation 8.4.5:

No change recommended.

Section 9: Natural Resource Development

Section 9.1 Renewable Energy

DCDP-12 Defending Environmental Wealth
DCDP-25 Defending Environmental Wealth
DCDP-62 Gineadoir Gaoithe Teoranta
DCDP-63 Mulmosog Wind Ltd
DCDP-74 Fermanagh & Omagh District Council
DCDP-82 Rights of Nature
DCDP-85 Ronald Ferguson
DCDP-103 Gas Networks Ireland
DCDP-108 Edward Gallagher
DCDP-112 Energia Renewables
DCDP-135 Joseph Brennan
DCDP-138 Uisce Eireann
DCDP-140 Northwest Energy Park
DCDP-141 Electricity Supply Board
DCDP-144 Cloghercor Wind Farm Ltd.
DCDP-148 Transport Infrastructure Ireland
DCDP-149 Planree Ltd.
DCDP-190 Wind Energy Ireland
DCDP-224 FuturEnergy Ireland
DCDP-231 Roger Garland
DCDP-240 SSE plc
DCDP-244 Loughs Agency
DCDP-252 Renewable Energy Systems Limited
DCDP-261 TRE Energy Holdings Ltd
DCDP-262 Northern and Western Regional Assembly
DCDP-265 Department of the Environment, Climate and Communications

9.1.1 Overview

26 submissions referenced renewable energy in its wider sense, however the majority (19) solely relate to, or partially relate to, wind energy developments. Of these, 9 submissions from the wind energy industry contain site specific windfarm proposals. These are illustrated in Map 9.1 and addressed individually below.

Key themes emerging from the submissions are identifiable as:

- Misalignment of policy in general, and Wind Energy Map 9.2.1 in particular, with European EU Regulation 2022/2577¹ and national carbon targets;
- Augmentation/repowering/extending the life of existing windfarms;
- Site specific submissions.

¹ .Council Regulation (EU) 2022/2577 of 22 December 2022 laying down a framework to accelerate the deployment of renewable energy.

- Alternative renewables, including solar, bio energy, biomethane, off-shore wind energy and hydrogen energy were the focus of 4 submissions and referenced in many others.

Other issues identified in the submissions include:

- Support for off-shore wind development;
- Recognise the positive contribution renewable energy can make to the economy;
- Consider necessary supporting development (incl. infrastructure) necessary to support the development of renewable energy;
- Potential impact on visual amenity from wind energy development;
- Potential impact on the natural environment from wind energy development; and
- End-of-life decommissioning and potential impact on biodiversity.

Section 9.1.2 Alignment with European EU Regulation 2022/2577 and National Carbon Targets

Criticism of Policy Approach

Six observations queried the alignment of renewable energy policy with international and national carbon targets, including 5 specific references to the Plan's alignment with 'REPowerEU' and EU Council Regulation (EU) 2022/2577. Specifically, these referenced the section of the Regulations relating to overriding public interest and that windfarm developments could be considered as strategic in nature and constitute a reason of overriding public interest in the context of the Appropriate Assessment process and the requirements of the EU Habitats Directive relating to protection of Natura 2000 sites. Essentially that protection of Natura sites could be overcome in the context of windfarm development. Others highlight the requirement to align with the following National Policy documents; Climate Action Plan 2023, Climate Action and Low Carbon Development Act, DHPCLG S28 Guidelines 2017 and Project Ireland 2040, including the alignment of draft policies with Sections 10 and 15 of the Planning and Development Act.

The submission from the Department of the Environment, Climate and Communications (DECC) raises key concerns over the misalignment of objectives and policies in the plan with the wind energy designations indicated on Map 9.2.1. Reflected in submissions from the energy industries, general dissatisfaction is expressed at the methodology used to construct Map 9.2.1, and specifically the layers of data used in the sieve mapping analysis process. Some industry submissions mention the layering of spatial maps that result in designations at a micro level relating to potential sites for windfarm developments.

In addition to general comments and observations on scenic amenity designations, there are 3 site specific queries by the renewable industries relating to such designations alongside requests to re-evaluate the designations of higher scenic landscapes to lower and the lowest scenic landscape.

DECC state the need for provision of an "unprecedented amount of national electricity grid infrastructure at both Transmission and Distribution levels", a concern mirrored in the submission from the ESB and from one of the industry providers, that suggest the county needs a minimum 220kv line and should consider 400kv, the minimum needed for offshore projects. NWRA acknowledge that the county has facilitated an extensive number of windfarms and additional windfarms may require grid reinforcement and strengthening.

DECC, ESB, and five industry submissions set out the requirement of the DHPCLG 28 Guidelines to acknowledge and document renewable energy policy and indicate how the implementation of the CDP will contribute to realising wind energy resources in MW, requesting that the wind energy strategy incorporate existing and proposed energy outputs to quantify the energy potential of the county.

Support for Approach

The OPR both recognise and commend the positive approach and steps the council are taking towards the facilitation of renewable energies in the Plan, and in particular that *"Map 9.2.1 which identifies locations suitable for wind farm development, will greatly assist in the implementation of renewable energy projects in a planned manner"*.

DECC give general support for the objectives and policies on renewable energy and welcome objective, E-O-2 to secure the maximum potential from wind energy resources in the county, and WE-P-4 relating to auto-producers supporting the sustainable development of a diverse and secure renewable energy supply.

ESB supports policies E-P-1 to facilitate development of grid reinforcements and E-P-2(a), to facilitate appropriate development of renewable energy and energy storage projects as well as WE-P-1(c) that provides for the augmentation, upgrade and improvements to certain existing and permitted windfarms.

Chief Executives Response:**General Policy Approach**

Firstly, it should be noted that the policy approach contained in the Draft Plan is very much in line with the 'consolidated' approach in the CDP 2018-2024 Variation In Respect of A Wind Energy Policy Framework (as amended by Ministerial Direction). The Direction was received in December 2022. Having regard to the support contained in the OPR's submission on the Draft Plan, it can be concluded that the policy approach as contained in the Draft Plan is grounded in sound planning principles.

With regard to Council Regulation (EU) 2022/2577, a recently published report from the Commission to the Council on the review of Council Regulation (EU) 2022/2577 (published 28th November 2023) is very relevant. This report discusses Feedback from the Member States on Article 3 of the Regulations. On consideration and analysis of Council Regulation (EU) 2022/2577, it is evident that this is targeted at policy change and provision at a national level. Furthermore, a new Renewable Energy (EU) Directive 2, published in October 2023 sets out both amended and additional procedures for Member States at a national level to meet renewable energy targets. The Regulation includes a temporary framework to accelerate renewable development following the war in Ukraine with the aim to secure an independent energy supply for Europe, that can be met by harnessing renewable energies. This framework must be put in place at a member state level and until such times as a National Plan is made to deliver the requirement of EU Regulation 2022/2577³ and revised EU Renewable Energy Directive, the Local Authority is not in a position to implement the measures contained therein.

The potential impact on the County's unique and distinctive landscapes arising from development is a core consideration when assessing proposals, including windfarms. The most sublime landscape in the County are designated as 'Especially High Scenic Amenity' (EHSA's). EHSA's are defined as areas of *"...sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development"*. It is considered that the identification of such areas as being 'Not Normally Permitted' for wind energy developments remains a sound basis for the management of these areas and thus it is not agreed that these designations should be redrawn arbitrarily.

² Directive (EU) 2023/2413 of the European Parliament and of the council of 18th October 2023 amending Directive (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources and repealing Council Directive 2015/652

³ Council Regulation (EU) 2022/2577 of 22 December 2022 laying down a framework to accelerate the deployment of renewable energy.

The need to provide details on the sieve mapping methodology used to construct wind energy Map 9.2.1 is acknowledged and it is agreed that this should be included in the Plan to both to provide clarity in the plan making process and show the various spatially mapped constraints.

The importance of the need to facilitate and support high quality supporting grid infrastructure and grid development upon which the industry is dependant, is agreed (this is addressed in Section 8.5 'Electricity Transmission and Gas Networks').

In the aforementioned Variation, it was concluded that in the absence of detailed technical guidance, it is not possible to make calculations regarding potential future output with any degree of accuracy for a number of reasons, and therefore that to extrapolate such data would serve no purpose at this juncture. This conclusion was not addressed in the Ministerial Direction.

Chief Executive's Recommendation 9.1.1:

- a) Not to amend the Plan on foot of the 'REPowerEU' and EU Council Regulation (EU) 2022/2577' and mapping contentions of the wind energy industry sector and the Department of the Environment, Climate and Communications'.
- b) Include "Sieve Mapping Methodology for Map 9.2.1" as an Appendix to the Plan. The recommended content is inserted at Appendix C of this Report.

(This is considered to be a material alteration.)

Section 9.1.3 Augmentation, Repowering and Extending The Life of Existing Windfarms.

Six industry providers (submission numbers 62, 63, 112,144, 240,265 and 244) express concerns over the perceived lack of a policy framework to facilitate the augmentation, repowering and/or extension of life of existing windfarms. This concern is also reflected in the DECC submission who encourage the inclusion of a specific objective "*...to promote the repowering and extension of the lifetime of existing wind power installations...*" in the Plan.

Chief Executives Response:

Policy WE-P-1 (c)(ii) in the Draft Plan provides very strong and explicit supporting for augmentation projects of the nature referenced in the submissions. This policy was intended to provide support for such projects in all three designated areas ('Not Normally Permissible'; 'Open to Consideration'; and 'Acceptable in Principle'). There is perhaps a misunderstanding that the placing of this policy under the header 'Not Normally Permissible', and the absence of a reference to such projects under the 'Acceptable in Principle' and 'Open to Consideration' sub-headers, intended that such augmentation projects would not normally be supported. However, precisely the opposite was intended. 'Acceptable in Principle' and 'Open to Consideration' sub-headers both refer to 'wind energy developments'. This was intended to refer both to new projects and augmentation projects. The inclusion of Policy WE-P-1c (ii.) was intended to underline support for augmentation projects even in 'Not Normally Permissible' areas, notwithstanding that new projects would not be supported.

The recommendation below seeks to provide clarity.

Chief Executive Recommendation 9.1.2

- 1) Delete Policy WE-P-1c(ii) (text to be deleted shown in ~~strikethrough~~):
That the principle of the acceptability or otherwise of proposed wind farm developments shall be generally determined in accordance with the three areas identified in Map 9.2.1 'Wind Energy' and as detailed below:

a. Acceptable in Principle

Wind energy development shall be generally acceptable in these areas

b. Open to Consideration

Wind energy development shall be generally open to consideration in these areas.

c. Not Normally Permissible.

i. Windfarm development proposals on previously undeveloped sites, inclusive of sites with a lapsed un-implemented permission (and where substantive works have not been undertaken) will not normally be permissible.

ii. ~~The augmentation, upgrade and improvements of: existing windfarms; windfarm developments under construction; developments where permission has lapsed but substantial works have been completed, or on sites with an extant planning permission will be open to consideration where such proposals shall be generally confined to the planning unit of the existing development, or where a modestly-proportioned projection (relative to the established unit) beyond the established footprint can be demonstrated to be essential and unavoidable for the augmentation project in terms of operational efficiencies, and can demonstrate beyond reasonable doubt that all environmental issues can be adequately mitigated~~

2) Insert new policy:

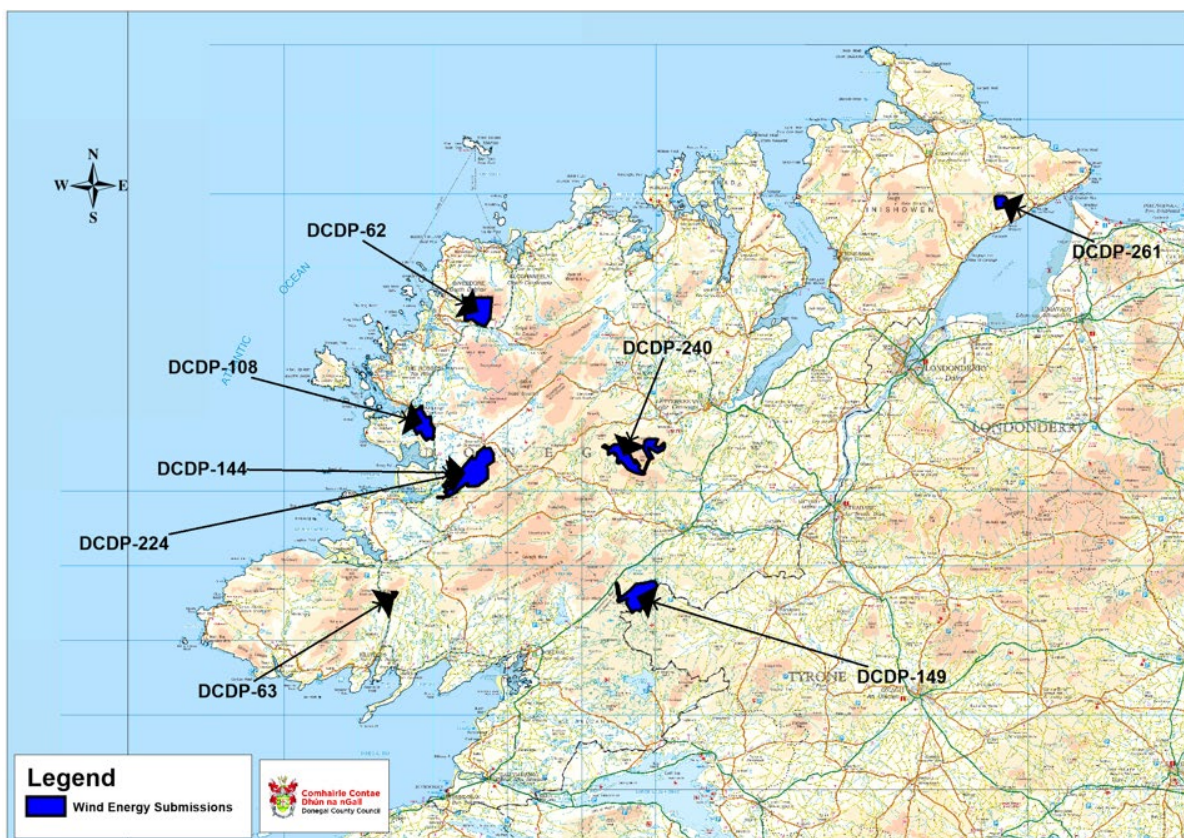
[WE-P-2: That the augmentation, upgrade and improvements of: existing windfarms; windfarm developments under construction; developments where permission has lapsed but substantial works have been completed, or on sites with extant planning permission will be open to consideration where such proposals shall generally be confined to the planning unit of the existing development, or where a modestly-proportioned projection \(relative to the established unit\) beyond the established footprint can be demonstrated to be essential and unavoidable for the augmentation project in terms of operational efficiencies, and can demonstrate beyond reasonable doubt that all environmental issues can be adequately mitigated.](#)

(This is considered to be a material alteration).

Section 9.1.4 Site Specific Submissions

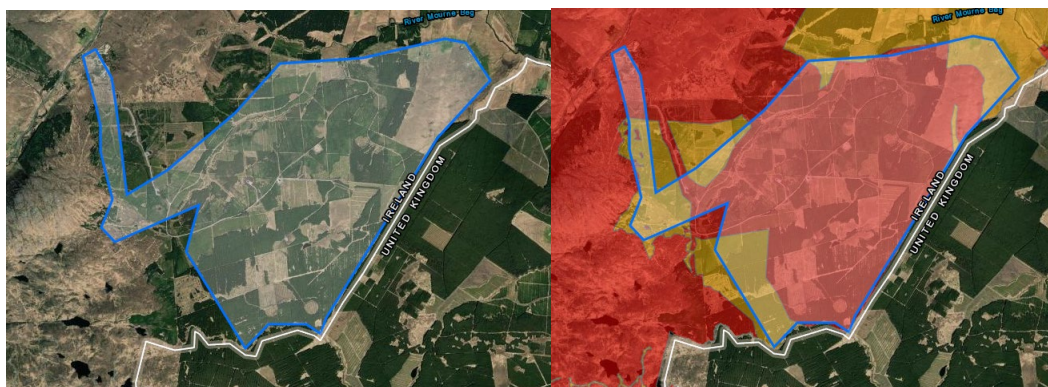
The Map below shows the location of specific sites raised across 8 submissions. These are considered individually below. The sites can be inspected in closer detail at the following link:

[Draft Wind Energy Mapping inclusive of submissions \(2024 - 2030\) \(arcgis.com\)](#)



PLANREE DCDP-149

Site Location and extract from Map 9.2.1



Proposal

Meenbog windfarm site should be changed from 'Not Normally Permissible' to 'Open to Consideration' in Map 9.2.1. Should allow the applicants to prove their suitability at a more local scale through AA and EIA.

Chief Executive's Response:

The recent planning policy history is instructive for this site. In the CDP 2018-2024 Variation In Respect of a Wind Energy Policy Framework the Meenbog site was included in the 'Not Normally

Permissible' designation. The associated Introduction document noted that this was: *owing to the exceptional landslide event that occurred here in November, 2020 and on the basis of the precautionary approach.*

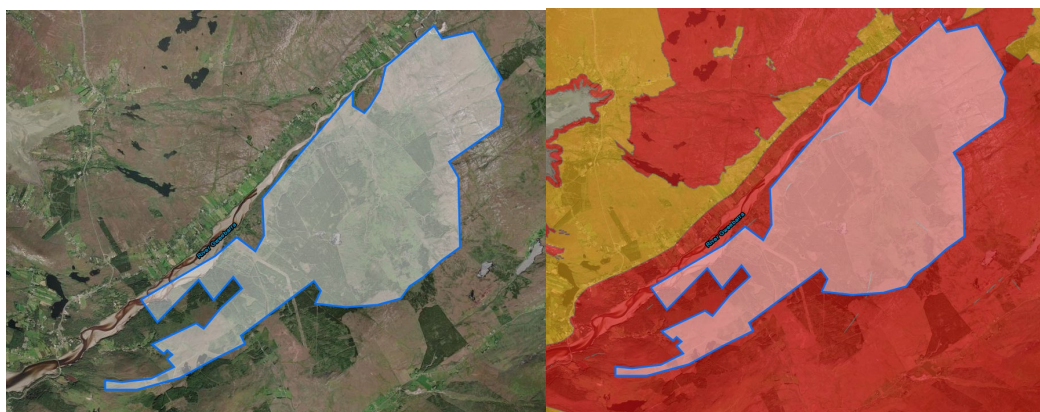
The recommendation below is made having regard to the recentness of the completion of the Variation process inclusive of Ministerial Direction, the need to respect the integrity of that process, and the consistency of the Draft Plan with the outcome of the Variation process in terms of how it addresses the Meenbog area. It is made also having regard to the opportunity to consider augmentation at this site in accordance with the revised augmentation policy as set out in Section 9.1.3 above.

Chief Executive's Recommendation 9.1.3:

Not to amend the Plan.

FUTURE ENERGY IRELAND (WEI) DCDP-224; and TOBIN CONSULTANTS DCDP-144

Site Location and extract from Map 9.2.1



Proposal

Gweebarra River Valley and FWPM catchments must not be included as constraints in the Sieve Mapping analysis.

Re-establish the positive zoning designation for the proposed Cloghercor windfarm reflecting site characteristics.

Provide evidence base for sieve analysis in Map 9.2.1.

Designate site as having Moderate Scenic Amenity.

Chief Executive's Response:

The recent planning policy history is instructive for this site. In the original draft Proposed Variation In Respect of a Wind Energy Policy Framework considered by Members, the Gweebarra River Valley was included in the 'Open to Consideration' area on the basis that that broad area was designated as 'Moderate Scenic Amenity' in Map 7.1.1: 'Scenic Amenity' (ie. the least valuable of three landscape designations in the County) and that the sieve mapping analysis did not evidence any other major considerations pertaining to this area. Subsequently, the Elected Members decided by resolution to incorporate the 'Gweebarra River Valley' into the 'Not Normally Permissible' designation. Those members of the public that made submissions at the time were generally in support of the published Map 8.2.1, as was the strong majority of Members of the Council. The Gweebarra Conservation Group stated that the river was a Natura 2000 site with its source in Glenveagh National Park, and that the entire valley and wilderness must be preserved for

environmental and tourism reasons. The two industry submissions at the time made the following observations in support of the area being placed back into 'Open to Consideration': that it is ambiguous why sensitive and visually vulnerable parts of the County, including the Gweebarra Estuary and coastline are within areas Open to Consideration, whilst the site of the Gweebarra River is proposed to be within areas designated as 'Not Normally Permissible'. They also suggested there was no scientific basis for this proposed policy, and that excluding this area from consideration for wind energy development should only take place where there is a supporting statement and scientific basis from an appropriate expert. The recommendation made at the time was to place the lands in the 'Open to Consideration' designation, consistent with that of the Executive when submitting the original draft Proposed Variation, and consistent with the established policy of the Council in relation to scenic amenity designation. However, Members resolved to include the area in the 'Not Normally Permissible' designation.

Notwithstanding all of the above, the Final Ministerial Direction in respect of the Variation must also be considered. The Draft Direction included the deletion of the following policy contained in the Draft Variation:

'Policy E-P-23: It is a policy of the Council that wind farm developments:

(i.) Must not be located within ... include the Gweebarra River Basin;'

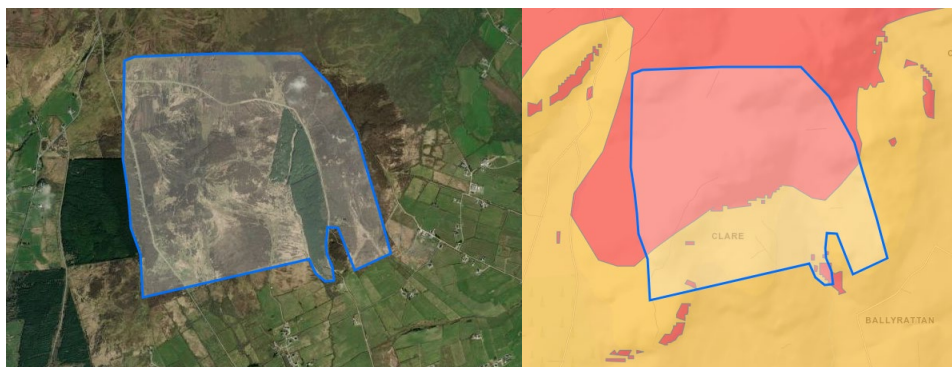
The recommendation below is made having regard to the recentness of the completion of the Variation process inclusive of Ministerial Direction, the need to respect the integrity of that process, and the consistency of the Draft Plan with the outcome of the Variation process in terms of how it addresses the Gweebarra area.

Chief Executive's Recommendation 9.1.4:

Not to amend the Plan.

DCDP-261 Canavan Associates on behalf of TRE Energy Holdings

Site Location and extract from Map 9.2.1



Proposal

Redesignation of lands at Clare from 'Especially High Scenic Amenity Designation' (EHSA) in lands within the identified site to 'High Scenic Amenity' (HAS) on the basis that the area has already been compromised by manmade features.

Remove High Peat Slip Risk pockets from 'Not Normally Permissible' layer and allow site specific assessment and analysis.

Change the designation of lands within the identified site from 'Not Normally Permissible' to 'Open to Consideration'.

Opinion of the Chief Executive:

The case made by the agent in terms of the already compromised nature of the area and thus that it should be removed from the EHSA designation (thereby allowing for the area to be changed to the 'Open to Consideration' designation is noted. However, it is considered that insufficient evidence has been submitted to substantiate this contention. That said, the Draft Plan already indicates that such issues can be considered at detailed application stage:

'Within each of the wind energy area designations on Map 9.2.1, and along the interface between the designations, there may be small areas that do not fully meet the intent of the designation. Such anomalies shall be considered individually and in the context of all other objectives and policies contained within this Plan, should an application for development be submitted in these. The onus shall be on the applicant to make the case that the site does not meet the characteristics of the designation within which it is, but ultimately it shall be a matter for the Planning Authority to adjudicate on such matters.'

It is considered that these matters could be evaluated to some degree at pre-planning stage.

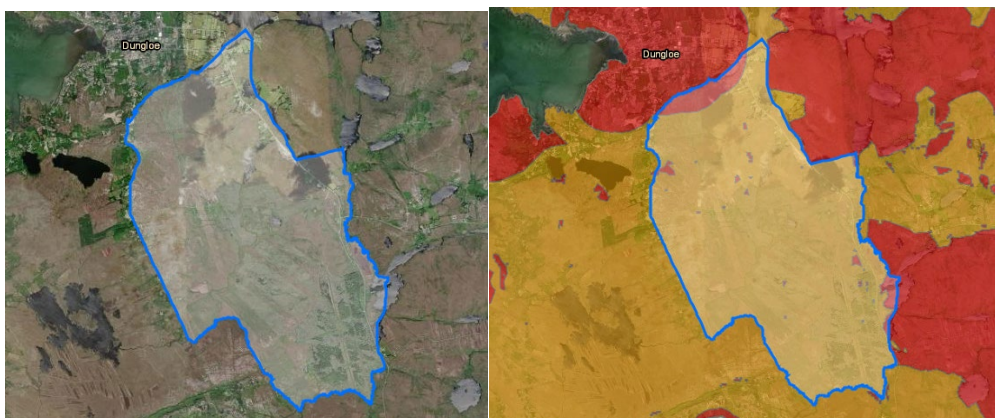
The High Peat Slide evidence is extracted from a reputable national source and it is not proposed to alter this approach. Again, any evidence at detailed project level seeking to counteract the national evidence could be considered on its own merits in consultation with relevant statutory bodies.

Chief Executive's Recommendation 9.1.5:

Not to amend the Plan.

Edward Gallagher DCDP 108

Site Location: Croagnashallog-Meenlecknalore Mountain



Proposal

Requests that *'the Croanashallog-Meenlecknalore Mountain be kept under consideration for a windfarm. Should there be any changes to the designation of this area, we request to be informed.'*

Chief Executive's Response:

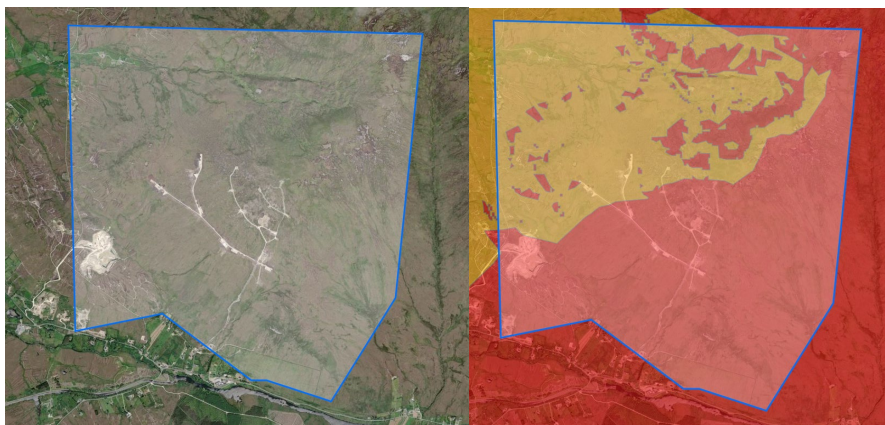
Comments noted. The broad area referenced in the submission is designated as 'Open to Consideration'.

Chief Executive's Recommendation 9.1.6:

Not to amend the Plan.

Harley Newman Planning Consultants DCDP-62

Site Location: Existing windfarm of 13 turbines at Cronalaght, Gweedore.

**Proposal**

Key request is for the existing windfarm to be designated as 'Acceptable in Principle' reflecting the structures already on-site. Also requests that the areas surrounding the existing windfarm be designated as 'Open to Consideration' to provide a more positive policy framework for the consideration of augmentation projects.

Chief Executive's Response:

Section 9.1.3 recommends a revised policy approach for augmentation sites. Having regard to the fluid nature of development proposals where, for example, sites with permission but undeveloped could lapse or new sites could be granted after the Plan is adopted, the map could become outdated particularly as we move towards a ten-year Plan lifetime. Therefore, it is considered that the revised policy approach as set out in Section 9.1.3 is an appropriate way to deal with such proposals.

Chief Executive's Recommendation 9.1.7:

Not to amend the Plan.

DCDP-63 Harley Newman Planning Consultants (On behalf of Mulmosog Wind Ltd.)

Site Location: Lands at Mulmosog/Altnagapple, Ardara

**Proposal**

Request that 'Not Normally Permissible' designation on Map 9.2.1 be changed to 'Open to Consideration'. This request is based mainly around landscape issues and sets out the case as to why the landscape has already been compromised by other windfarms already constructed in the vicinity.

Opinion of the Chief Executive

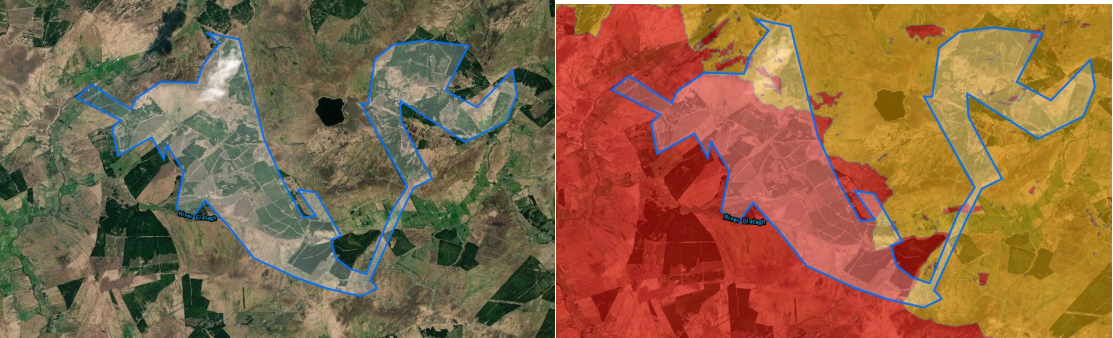
The mapping and designation of these lands have been informed by 7 different mapping layers (see below). Layers 6 (High Landslide Susceptibility) and 7 (Freshwater Pearl Mussel Catchment), are consistently applied across the County to the 'Not Normally Permissible' designation.

1. HAS
2. Peat Bogs
3. High status objective water catchment area
4. Geological Heritage Sites
5. ROI SPA buffer
6. High landslide susceptibility
7. FWPM catchment.

On the basis that the wind energy Map 9.2.1 has been constructed in a consistent, evidenced based manner in accordance with the Wind Energy Development Guidelines 2006, no change is recommended.

Recommendation 9.1.8:

Not to amend the Plan.

SSE DCDP-240
<p>Site Location and extract from Map 9.2.1</p> 
<p>Proposal</p> <p>Redesignate lands at existing Meentycat Windfarm from with 'Not Normally Permissible' to 'Acceptable in Principle. Also concerned re the approach to augmentation opportunities.</p>
<p>Opinion of the Chief Executive:</p> <p>The 'Not Normally Permissible' designation was informed by the following layers of data:</p> <ul style="list-style-type: none"> - High Landslide susceptibility - EHSA - SAC (partial) - FWPM Catchment <p>Section 9.1.3 contains a recommended revised policy approach to augmentation projects, which change would enable consideration of augmentation projects in this area. Otherwise, on the basis that the wind energy Map 9.2.1 has been constructed through the consistent application of evidence in accordance with the Wind Energy Development Guidelines 2006, no further amendments are recommended.</p>
<p>Recommendation 9.1.9.</p> <p>Not to amend the Plan.</p>

9.1.5 Miscellaneous

ESB DCDP-141
<p>Makes a number of specific suggestions for enhancement of the policy framework for renewables.</p>
<p>Chief Executive's Response:</p> <p>These are generally agreed with the exception of a proposal to support for natural gas, given the Council's policy position in relation to fracking. This is reflected in the recommendation below.</p>
<p>Chief Executive's Recommendation 9.1.10:</p> <p>1) Insert new Policy E-P-6: It is the policy of the council to support utility scale solar installation of a scale and design that would assimilate into the landscape, subject to other objectives and policies of this plan.</p>

- 2) **Insert new Policy E-P-7: It is a policy of the council to Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which supports energy efficiency and reusable energy systems, subject to other objectives and policies of this plan.**
- 3) **Insert new Objective E-O-6: To support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment and subject to other objectives and policies of this plan.**
- 4) **Insert new Objective E-O-7: To recognise that natural gas, particularly renewable and indigenous gas with the exception of fracking proposals, will continue to have a role to play in the transition to a low carbon economy.**

(These are considered to be material alterations.)

Department of the Environment, Climate and Communications DCDP-265

Key issues raised are in relation to: (1.) the reference to 'a minimum of 220kv electricity lines as contained in both Objective E-O-1 and ETN-O-1; and (2.) the use of existing roads for the provision of electricity lines.

(These issues are addressed in Section 8.5 and 8.1 of this Report respectively.)

Section 9.2 Extractive Industries

Department of the Environment, Climate and Communications (DECC) - DCDP-262

The Section headed 'Geoscience Policy' on p.20 advises that 'A clearer distinction in Section 9.2 should be drawn between aggregates and minerals, as in some of the text these are conflated.'

Chief Executive's Response:

Agreed. The revised text as recommended by the Department is included in the recommendation below.

Chief Executive's Recommendation 9.2.1:

Amend para. 9.2.1 as below (existing text in black; **new text in blue**; ~~text to be deleted in strikethrough~~)

Aggregates are a significant and necessary natural resource for the continued economic development of Donegal including job creation and are essential materials for construction industry. The Plan needs to make provision for the sustainable and appropriate extraction of ~~minerals~~ **aggregates** including clays, gravels, sands, stone, and aggregates subject to compliance with pertaining legislation and guidelines. Specifically, factors that must be considered in order to minimise the impact of any extractions include, but are not limited to noise, vibration, dust, water quality, the North-west River Basin Management Plan, natural and cultural heritage, landscape, and waste materials.

Aggregate is the collective name for natural rock and gravel deposits and mapping of Aggregate Potential in Ireland is prepared by the Geological Society Ireland and is widely available online. This mapping can assist in the identification of locations of certain ~~minerals~~ **aggregates** throughout the county but is not to be construed as locations where extraction would be appropriate in the round.

The Minerals Development Act 2017 governs the exploration for, and development- **extraction** of all minerals ~~other than stone, gravel, sand or clay and that may include small, non-commercial quantities of minerals.~~

The Department of the Environment, Climate and Communications is responsible for the issuing of Prospecting Licences to undertake mineral exploration in Ireland, these licences are normally renewed every 6 years permitting prospecting only and not extraction. At present there are four **prospecting** licences within the county. The DECC is also responsible for the issuing of mining lease or licences, these ~~and prospecting~~ licences also require planning permission and an Integrated Pollution Control licence (from the EPA) before extraction can proceed. Proposals for extractive industries are encouraged to have regard to the Donegal Climate Adaptation Strategy, 2019-2024.

(This is considered to be non-material.)

NWRA DCDP-262

Suggests that the policy framework 'would appear to lack certain detail'. There are ongoing issues with aggregate supply in County Donegal, with a decreasing number of suppliers within the County, this is not acknowledged within the Draft Plan. The Quarry Guidelines for Planning Authorities (2004) outline that areas of aggregate potential are identified and that these should be mapped, and this is potentially an area the Council could consider. The Defective Block / MICA crises will necessitate such supply matters are resolved for the lifetime of this Plan and beyond.

Chief Executive's Response:

The Council are reviewing the scope of aggregate potential within the county as part of an ongoing commitment to the sector. This work includes the regularisation of quarry sites across the county and the identification of the scope for the expansion of the aggregate potential in the county. As a land use the plan provides for the principle of the sustainable development of new and existing sources of aggregate. The broader context of the defective concrete blocks issue and its impact on multiple sectors is addressed through the council's wider response to the remediation scheme, including the advice provided on the practical issues facing homeowners.

Chief Executive's Recommendation 9.2.2:

Not to amend the Plan.

Defending Environmental Wealth DCDP-12

Advises that: 'On behalf of the Inishowen anti-mining group make the following submission under Natural Resources and under the Objective EX-0-1. The use of the following chemicals as a processing agent shall not be permitted as part of any proposed processing operation located above or adjacent to surface or ground waters, or which could potentially impact such waters regardless of their location - mercury, cyanide, or cyanide compounds, breakdown products of cyanide, or sulfuric acid. These present an unreasonable risk of environmental harm due to the toxicity of such chemicals and their demonstrated potential to cause damage to the environment.

Chief Executive's Response:

As a potential consideration associated with new planning applications for the quarrying industry, the processes and operations involved are examined through the submission of detailed environmental reports and technical documents associated with proposed developments and the expert advice of appropriate national agencies and prescribed bodies shall be sought to inform any subsequent decision. Matters that are governed by separate regulators will remain within the domain of such organisations to manage and ensure compliance.

In this context, the provision and scope of objective EX-O-1 remains as a solid foundation within which any such proposals can be considered and assessed.

Chief Executive's Recommendation 9.2.3:

Not to amend the Plan.

Keep Ireland Open DCDP-231

This lengthy and complex submission makes a multitude of policy proposals regarding the the extractive industry sector and geology and these are observations noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan seek to sustainably guide the sector in the county. The key strategic context addressing the planning requirements for the sector are comprehensively set out within the draft Plan (section 9.2 refers).

Chief Executive's Recommendation 9.2.4:

Not to amend the Plan.

Section 10: Tourism

Failte Ireland

At the outset, FI advises that it is 'seeking to enhance the partnership approach between DCC and FI and ensure that the expertise of both organisations is shared. Generally, FI considers that while the Draft 'has references to tourism and its many challenges and sectors ... the tourism Chapter as currently drafted is not robust enough to ensure the integration of tourism policy and land use plans.' It is therefore seeking 'to enhance the policy coverage ... to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region.'

In this context, FI makes various constructive suggestions re how the contents of the Draft could be enhanced. (nb. FI also comments on issues pertaining to Chapters 2, 6, 7 and 13; these are addressed in the corresponding sections of this Report.) FI suggests that the Tourism chapter could benefit from the inclusion of (a total of thirteen) sub-sections. For most of these (including, inter alia: 'Arts, Crafts and Food Tourism'; 'Rural Tourism'; 'Activity Tourism' and Greenways and Blueways Tourism' the submission does not elaborate any further, and it is considered that the general policies contained in the Draft Plan (Tourism chapter, and Transportation chapter in the case of Greenways) will be sufficient to manage proposals of this nature. The FI submission does elaborate on several themes and it is agreed that these issues could be given a greater focus in the Plan.

Wild Atlantic Way

As the most significant tourism attractor in Donegal, it is considered that it should be outlined in a dedicated subsection. The section should be greater aligned with the Failte Ireland Wild Atlantic Way Regional Tourism Development Strategy 2023-2027.

In addition to the request for a dedicated section, FI also makes specific request for the inclusion of objectives to:

- (DCC to) work in collaboration with FI to ensure the continued maintenance of 39 Discovery Points in Donegal and access routes for all users, with a particular focus on the 3 signature Discovery Points.
- support the preparation and implementation of the WAW Regional Tourism Development Strategy 2023-2027, to support the continued collaboration with FI and tourism stakeholders to ensure successful implementation and delivery of regional tourism plans.

Chief Executive's Response:

As acknowledged by FI, the WAW is already addressed in the Draft Plan. DCC's mission is to promote the Donegal brand and showcase the entire county as a first-choice visitor holiday experience where excellence and value are paramount. As part of this approach, Donegal will take its place as a primary destination on the Wild Atlantic Way in Ireland, offering an extremely attractive total visitor experience unique to Donegal.

From this perspective, it is considered that the structure of the chapter as contained in the Draft Plan is appropriate. Notwithstanding, specifically regarding the objectives requested by Failte Ireland, Policy TOU-P-1 in the Draft Plan addresses the WAW. The recommendation below is to amend this existing policy to incorporate the requests of FI.

Chief Executive's Recommendation 10.1:

1) Amend Policy TOU-P-1 (existing text in black; **new text in blue**)

TOU-P-1:

- a. **To support the implementation of the WAW Regional Tourism Development Strategy 2023-2027;**

- b. To facilitate the development of signature/strategic tourism experiences/attractions which are consistent with the brand identity of the Wild Atlantic Way and other similar initiatives, and are generally in accordance with the policies of this Plan; and
- c. To work in collaboration with Failte Ireland to ensure the continued maintenance of the 39 Discovery Points, inclusive of the 3 signature Discovery Points, in Donegal and access routes for all users;

(This is considered to be non-material.)

Sustainable Tourism

FI advises: *'Given that the tourism offering is based in part on the natural and built heritage, it is crucial that the quality, character and distinctiveness of these assets are protected.'* For these reasons, recommends including a policy 'which supports Donegal as a sustainable tourism destination.'

Chief Executive's Response:

The need to strike the right balance between the tourism objective and protecting the heritage assets of the County is already recognised in Objective TOU-O-1:

TOU-O-1

To facilitate the sustainable development of Donegal's tourism product as a key economic driver of, and social catalyst for the County, whilst protecting and enhancing the County's landscape, natural heritage, built heritage, and communities from inappropriate development that would detract from the tourism product.

The Natural Heritage and Built Heritage sections contained in Chapter 11 of the Plan provide additional protections.

Chief Executive's Recommendation 10.2:

Not to amend the Plan.

Tourism Accommodation

FI requests *'a more positive narrative which strongly advocate for and support (tourism accommodation) provision in the County.'* Similarly, *'while Policies TOU-P-6 to 8 refer to accommodation provision the Draft Plan doesn't contain a standalone overarching policy which supports the provision of visitor accommodation of all types eg. the development plan should explicitly facilitate tourism accommodation in principle (subject to the usual development management considerations).'*

DCCP 233 John and Rory Shevlin raised the issue that TOU-P-6 and the associated table prohibits static mobile homes developments in rural areas and otherwise suggests that developments up to 30 touring caravans/campervans should be facilitated in such areas.

Chief Executive's Response:

It is not agreed that the suggested broad policy approach is appropriate. The advent of the campervan, glamping and other forms of 'non-mainstream' accommodation, and particularly the demands for such uses in sensitive parts of the County, requires a more clearly defined policy approach. The detailed Policy TOU-P-6 as contained in the Draft Plan was drafted to provide such clarity and it is considered that this approach should be maintained.

Chief Executive's Recommendation 10.3:**Not to amend the Plan.****Festivals and Events**

FI notes that: '*Festivals are key motivators for local, domestic and international consumers, as they increase both dwell time and economic impact. Festivals also play a significant role in animating destinations, and whilst smaller festivals may not be the single reason why visitors travel to a location, they can be a significant contributor to their enjoyment of their holiday experience as they create vibrancy and 'something to do' as part of their stay. Festivals in Donegal play a key role in particular with the county benefiting from funding through the Regional Festival Fund and also having 4 nationally funded festivals.*'

In this context, FI request the inclusion of a new objective to support the aforementioned.

Chief Executive's Response:

It is agreed that the Draft Plan is deficient regarding this issue. This is reflected in the recommendation that follows.

Chief Executive's Recommendation 10.4:

Insert a new sub-section on Festivals and Events:

Festivals are key motivators for local, domestic and international consumers, as they increase both dwell time and economic impact. Festivals also play a significant role in animating destinations, and whilst smaller festivals may not be the single reason why visitors travel to a location, they can be a significant contributor to their enjoyment of their holiday experience as they create vibrancy and 'something to do' as part of their stay. Festivals in Donegal play a key role in particular with the county benefiting from funding through the Regional Festival Fund and also having four nationally-funded festivals.

Insert new **Policy TOU-P-xx**: Support and promote existing festivals and sporting events to increase the cultural, heritage and lifestyle profile of the county, and, where appropriate, promote and facilitate the development of new festivals and events, subject to compliance with other relevant provisions of this Plan.

(This is considered to be a material alteration.)

Destination Experience Development Plans

FI advises: The key to unlocking the growth potential of an area is the development of experiences that will motivate potential visitors to firstly visit there and secondly to dwell in the area. These new experiences are less concerned with visitors passively seeing or doing things; they encourage visitors to immerse themselves actively in the locale, interacting with people, engaging the senses, and learning the history and stories of the places. Fáilte Ireland's response to this challenge has been the creation of a framework to develop and deliver Destination and Experience Development Plans along with strengthening Destination towns. This approach identifies the key assets of an area and provides a framework to present the experiences and stories of that area in a way that visitors can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area. There is a total of 16 no. DEDPs in the Wild Atlantic Way region with a number of plans either in progress or at the plan implementation stage. It is noted within the Wild

Atlantic Way Tourism Development Strategy 2023-2027 that DEDPs will be implemented for the Inishowen Peninsula, West Donegal & the Islands and for South Donegal.

FI thus requests an objective acknowledging and supporting existing and future DEDPs, and supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these plans.

Chief Executive's Response:

Agreed.

Chief Executive's Recommendation 10.5:

Insert a new sub-section on 'Destination and Experience Development Plans':

Faillte Ireland advises that the key to unlocking the growth potential of an area is the development of experiences that will motivate potential visitors to firstly visit there and secondly to dwell in the area. These new experiences are less concerned with visitors passively seeing or doing things; they encourage visitors to immerse themselves actively in the locale, interacting with people, engaging the senses, and learning the history and stories of the places. Fáilte Ireland's response to this challenge has been the creation of a framework to develop and deliver 'Destination and Experience Development Plans' along with strengthening Destination towns. This approach identifies the key assets of an area and provides a framework to present the experiences and stories of that area in a way that visitors can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area. There is a total of 16 no. DEDPs in the Wild Atlantic Way region with a number of plans either in progress or at the plan implementation stage. The Wild Atlantic Way Tourism Development Strategy 2023-2027 notes that DEDPs will be implemented for the Inishowen Peninsula, West Donegal & the Islands and for South Donegal.

Insert new **Policy TOU-P-xx**: To support Failte Ireland in the development of 'Destination and Experience Development Plans' for the Inishowen Peninsula, West Donegal & the Islands and for South Donegal.

(This is considered to be a material alteration.)

Signature & Strategic Tourism Projects

NWRA DCDP-262

Cllr. B. Sweeney DCDP-215

FI requests the inclusion of specific objectives to provide support for the delivery of key projects at Fort Dunree, Glenveagh National Park, and Malin Head.

Similarly, the NWRA notes that, whilst not listed in key projects Table 10.1, An Grianan of Aileach and Errigal are in the top five most visited sites in Donegal.

Cllr. B. Sweeney highlights the omission from Failte Ireland figures of "Castle Adventure Open Farm". It had 40,000 visitors in 2022 and has been expertly operated as a major tourist attraction for many years. The facility has been involved with many marketing programmes, promotions and the Holiday Expo in the RDS with DCC. They host many events during the year and contribute to other tourism providers (food/accommodation/other) in the region and certainly deserve to be noted among the top attractions in the County.

Separate from the comments contained in these submissions, a review of the policy context associated with signature tourism projects that have been identified within the plan (e.g. as identified in Table 10.1 Key Tourism Attractions in County Donegal) and where the recorded visitor numbers identify these projects as regionally significant and strategic visitor attractions, has necessitated a revision to the text in policies TOU-P-1 and TOU-P-8 to ensure that the sustainable development and improvement of these signature attractions is not incumbered.

Chief Executive's Response:

Policy TOU-P-1 already provides support in general terms for the development of signature/strategic tourism experiences/attractions. The recommendation below includes proposing a slight amendment of this policy to specifically refer to projects listed in Table 10.1, and to include additional acknowledged key attractions of Fort Dunree, An Grianan of Aileach and Errigal in the table.

The comments of the submission are noted. Table 10.1 is formulated by Fáilte Ireland on the basis of visitor numbers for Donegal in 2021. This table is a snapshot of the attractions and is not definitive of the key tourism attractions that are on offer in the County.

In terms of ensuring that the sustainable development and improvement of signature attractions is not incumbered, revised text for policies TOU-P-1 and TOU-P-8 is set out below.

Chief Executive's Recommendation 10.6:

Amend Policy TOU-P-1 (existing text in black; **new text in blue**)

TOU-P-1: To facilitate the development of signature/strategic tourism experiences/attractions which are consistent with the brand identity of the Wild Atlantic Way and other similar initiatives **and attractions, for example as identified in Table 10.1,** and are generally in accordance with the policies of this Plan.

Amend Table 10.1 to **include Fort Dunree, An Grianan of Aileach and Errigal.**

(This is considered to be non-material)

Amend Policy TOU-P-8 (existing text in black; **new text in blue**; ~~text to be deleted in strikethrough~~)

TOU-P-8: That all development proposals for the creation of new, or the extension of existing Tourist Developments (including Resource Related/Activity based Tourism Product Developments, Campervan/Motorhomes and Touring Caravan Stopover Sites, Hotels, Guest Houses, Tourism Hostels, Holiday Resorts, Mobile Homes/Static Caravan Parks Camping Sites, and other Tourist Related Developments) shall comply with the following criteria:

- a. The location, siting and design of the development (including associated infrastructure and landscaping arrangements) is of a high quality, integrates successfully with, and does not, either individually or in combination with existing and permitted developments, have an adverse impact on; the scenic quality, visual amenity, rural character, streetscape, vernacular character or built environment of the area.
- b. ~~The development is not located within~~ **That there are no significant impacts on** designated habitats such as Natura 2000 sites and designated Nature Reserves.
- c. The development does not negatively affect sensitive natural environments.
- d. The development is significantly set back from, and adequately screened from, coastlines, shorelines and riverbanks.
- e. The development will not detract from the visual setting of the coastline or be visually obtrusive from key points along the coastline.
- f. Appropriate boundary treatment, landscaping and means of enclosure are provided and any areas of outside storage proposed are adequately screened from public view;
- g. The development will not significantly impact on existing residential amenities.

- h. There is an adequate means of water supply.
- i. There is existing capacity in the public wastewater infrastructure for developments within urban areas or suitable on-site effluent treatment facilities to EPA standards can be provided in rural areas.
- j. The development will not cause a traffic hazard, and the existing road network can safely handle any extra vehicular traffic generated by the proposed development.
- k. Adequate parking provision, access and manoeuvring arrangements (including for touring coaches and motorhomes), and servicing areas are provided in accordance with road safety standards, and the technical standards and policies of this Plan.
- l. The layout of the development provides for a high level of, and prioritises, pedestrian permeability and access.
- m. The development does not create a noise nuisance and will not cause any significant environmental emissions.
- n. The development will not have an adverse impact on the built, scenic, or natural heritage of the area including structures on the RPS/NIAH and designated habitats such as Natura 2000 sites and designated Nature Reserves.
- o. The development is not located in an area at flood risk and/or will not cause or exacerbate flooding.
- p. The development will not compromise the water quality of water bodies within River Basin Districts designated under the Water Framework Directive or hinder the programme of measures contained within any associated River Basin Management Plan.

(This is considered to be non-material.)

Water Sports Activity Facilities

FI requests specific support for the Tullan Strand Centre for Water Sports Activities, Bundoran and Downings Sports Activity Facility, with both benefitting from funding under FI's Platforms for Growth programme.

Chief Executive's Response:

The water sports sector is already recognised in the Draft Plan narrative (bottom p.175) and in Policy TOU-P-5. However, there is merit in giving special recognition to these projects in the context of the Chapter's policy framework.

Chief Executive's Recommendation 10.7:

Amend Draft Plan narrative (existing text in black; **new text in blue**):

Interest and participation in outdoor recreational activities has surged in popularity particularly in a post Covid-19 environment where the value of the great outdoors has become a key defining reason for people to choose Donegal as a holiday destination, and the county's natural assets (coastline; rivers and lakes; cliffs and waterfalls; and hills, valleys and mountain ranges) are characterised by a growing number of self-guided and organised recreational activities. Failte Ireland's **Tullan Strand Centre for Water Sports Activities, Bundoran and Downings Sports Activity Facility projects funded under its Platforms for Growth programme are examples of the interest in this sector.** The Outdoor Recreation Strategy for Donegal provides a roadmap to inform the sustainable development and management of outdoor recreation over the next 5 years, whilst still preserving the ecological and culturally rich land and waterscape that is unique to Donegal, and upon which outdoor recreation depends.

(This is considered to be non-material.)

P. Lewis DCDP-14

Refers to lack of motorhome parking sites. Campsites are prohibitively expensive, don't offer short stays, can suffer from antisocial behaviour, are too far to walk from and are closed out of season which is most of the year.

They have these facilities all over Europe and beyond it just seems the UK and Ireland(although catching up) is a bit behind. Foreign Motorhome owners are quite surprised at the lack of simple Aire facilities they are used to at home. Motorhomes have small fridges so we eat out and like to shop locally independent outlets frequently.

Chief Executive's Response:

The potential of this sector in the County was recognised in the Council-commissioned KPMG Future Analytics study in 2021. This assessment examined the state of the tourism sub-sector comprising Caravan, Camper Van and Camping (CCC) in County Donegal and set out key recommendations for the future development of this important strand of the county's tourism infrastructure. This key recommendation of this study is reflected in the Draft Plan Policy **TOU-P-06** which supports the development of proposals for standalone tourism-related accommodation development in both urban and rural areas (excluding ESHA areas) subject to compliance with the specific requirements set identified in terms of location and provision of and access to the necessary infrastructural requirements.

Chief Executive's Recommendation 10.8:

Not to amend the Plan.

Keep Ireland Open DCDP-231

This lengthy and complex submission makes a multitude of policy proposals regarding the tourism sector and these are noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan seek to sustainably develop the tourism sector in the county.

Chief Executive's Recommendation 10.9:

Not to amend the Plan.

Section 11: Natural and Built Heritage Section

List of Submissions Received Related to Chapter 11 Natural and Built Heritage

Ref	Submitter Name/Organisation	Summary of Topics Raised Related to this Chapter
DCDP-211	Office of the Planning Regulator (OPR)	RPS, TEN-T PRIPD
DCDP-183	Department of Housing Local Government and Heritage	Amendment to and Proposed New Biodiversity Policies and Archaeology
DCDP-67	Mark Carlin	Scenic Amenity Designations
DCDP-72	Friends of Dunree	Dunree Fort
DCDP-74	Fermanagh & Omagh District Council	Biodiversity and Landscape
DCDP-85	Ronald Ferguson	Rewetting
DCDP-104	Land Development Agency	Reuse of Built Heritage
DCDP-129	John Mulcahy	Shellfish
DCDP-135	Joseph Brennan	Protection of Cró na mBroanáin Red Grouse Sanctuary
DCDP-145	Inishowen Development Partnership (IDP)	EcoCarn Biodiversity Action Plan.
DCDP-190	Wind Energy Ireland	Wind Energy, Natura 2000 sites, Biodiversity Net Gain
DCDP-223	John and Rory Shevlin	Scenic Amenity Re-designation Request Dundoan Lower Downings
DCDP-224	Future Energy Ireland	Landscape and Biodiversity
DCDP-231	Roger Garland	General (See Categories)
DCDP-240	SSE plc	Landscape and Biodiversity
DCDP-255	Dominic McGroddy	Scenic Amenity Designation Dundoan Lower
DCDP-261	TRE Energy Holdings Ltd	Scenic Amenity Designation, Wind Energy Designation Clare Redcastle
DCDP-262	Northern and Western Regional Assembly	Landscape Protection
DCDP-277	St Eunan's College, Letterkenny	Landscape
DCDP-278	St Columbas's College, Stranorlar	Landscape
DCDP-279	Rosses Community School, An Clochan Liath	Landscape
DCDP-280	Colaiste Ailigh, Leitir Ceanainn	Landscape
DCDP-284	Crana College, Bunrana	Landscape

Submission Summary and Chief Executive Response/Recommendation

DCDP-211 Office of the Planning Regulator
<p>Submission Summary</p> <p>Section 9.2 Record of Protected Structures of said submission welcomes positive policies in relation Architectural Heritage Areas and Archaeological Heritage. However, it states that no Record of Protected Structures has been included as part of the draft plan and states that it necessary to include this as a material amendment.</p> <p>Section 9.3 Natural and Built Heritage, Biodiversity, and the Environment of the OPR submission expresses concern over the exclusion applied to provision of strategic infrastructure in respect of protection policies for Nature 2000 sites. Biodiversity, environmental amenities, protected structures and archaeological sites. States that in particular the exclusion appears to provide that strategic infrastructure projects including the TEN-T project do not have to comply with the policies for the protection of architectural features, landscapes and coastlines, protected species, qualifying interests and all biodiversity features of interests. States that these limitations conflicts with</p>

Section 10(2)(c), (ca) and (f) of the Act and are inconsistent with NPO 52, RPO 5.5 RPO, 5.7 and RPO 5.14.

The associated **OPR Recommendation 19** requires the PA to amend the following policies to omit exemption for Strategic Infrastructure Projects including the TEN-T Project: BIO-P-2, BIO-P-3, L-P-3, AH-P-3, AH-P-7, AH-P-8, AH-P-9, AYH-P-2 and AYH-P-3

Chief Executive Response

It is agreed that the RPS should be included in full in the Plan. The requirements of Section 51(1) of the Act are noted: *'...every development plan shall include a record of protected structures ...'* are noted and it is agreed that it should be included in full in the plan as a material amendment.

The **TEN-T Priority Improvement Project Donegal (PRIPD)** is of critical strategic importance for Donegal including in terms of regional connectivity, road safety, reducing traffic congestion and freeing up road space for sustainable travel modes in urban areas, and quality of life.

The TEN-T PRIPD is being planned and designed in full cognisance and adherence to EU and National requirements in respect to Environmental legislation and policies for the protection of architectural features, landscapes and coastlines, protected species, qualifying interests and all biodiversity features of interests. In no way does the Donegal CDP seek to prioritise the TEN-T PRIPD or other strategic infrastructure projects over these statutory requirements.

However, having taken into consideration submissions from the OPR and the Department and following fresh legal advice, these TEN-T PRIPD/SID policy provisions have been reviewed. On foot of said review it is considered the said provisions can be amended in a manner which:

- a) Makes it clear that the council is not seeking to override, or indicating an intention to ignore or breach legislative protections for biodiversity, architecture, archaeology etc.
- b) Where such natural/built heritage features do not have legislative protection, to clarify that the Council will implement said objective/policy only in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects/the TEN-T PRIPD.

The consequential recommended amendments to these objectives/policies are set out in Recommendation 11.1 below. Note: This also includes amendments to other similarly worded policies not cited by the OPR.

In addition, the recommendation below also contains amendments to said policies which are recommended on foot of the Department of Housing, Local Government and Heritage submission.

Chief Executive Recommendation 11.1

Insert the Planning Authority’s Record of Protected Structures into the Plan as Part C of the Plan.

Amend the following policies as set out below (existing text in black; **new text in blue**; ~~text to be deleted in strikethrough~~)

T-P-8	<p>Save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, and the Buncrana Inner relief Road it is a policy of the Council to p Protect established/historic railway corridors throughout the County, primarily for strategic infrastructure provision (such as rail/road/greenway projects), and secondly for recreational development. such as roads (including those sections required for the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, and the Buncrana Inner relief Road) greenways, and rail projects and secondly for recreational development. Along these corridors other uses shall not be considered. Where these corridors have already been compromised by development, adjacent lands which could provide opportunities to bypass existing obstacles and reconnect these routes shall be protected for this purpose. However, in all instances, the over-riding objective shall be the provision of strategic</p>
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	<p>infrastructure. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of such Strategic Infrastructure Projects.</p>
BIO-P-2	<p>Ensure that all developments seek to conserve/protect the qualifying interests of Ramsar Sites, Nature Reserves, Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), and any species protected under the Wildlife Act save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions. Otherwise, where no statutory or regulatory provisions apply this policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of such projects.</p>
BIO-P-3	<p>Save to the extent necessary to provide for strategic infrastructure projects including the TEN-T Priority Route Improvement Project, Donegal, it is the policy of the Council to:</p> <ol style="list-style-type: none"> Protect, where justified, features of local biodiversity value (e.g. hedgerows/field boundaries, trees, woodlands, wetlands, water bodies, riverbanks and peatlands) which make a significant contribution to the biodiversity, ecological connectivity, and associated visual amenity and/or rural character of the area. Require, where justified, that developments otherwise maximise the retention of and suitably integrate such features. In this regard proposals for the removal of existing roadside hedgerows/field boundaries for new developments in rural areas will only be permitted in so far as is necessary to safeguard public safety and any remaining portion of those features identified above not so required shall be retained. Require that development proposals provide biodiversity enhancement measures (e.g. native tree and hedgerow planting, and nature-based water management solutions). Require that large-scale developments result in no net biodiversity loss, and include a site-specific comprehensive Biodiversity Management Plan (BMP), as part of any planning proposal. <p>This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner relief Road and Greenways.</p>
L-P-3	<p>To safeguard the scenic context, cultural landscape significance, recreational/tourism amenities, and environmental amenities of the County’s coastline from inappropriate development, save for strategic infrastructure provision of overriding regional or national public interest. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner relief Road and Greenways.</p>
AH-P-3	<ol style="list-style-type: none"> Protect all structures or parts of structures on the RPS to include protection of the curtilage, attendant grounds; and, Require that development proposals directly affecting structures on the RPS are appropriate in terms of architectural treatment, character, scale, and form to the existing protected structure and not detrimental to the special character and integrity of the protected structure and its setting. <p>save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner relief Road and</p>

	Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions.
AH-P-7	Require that development of structures on the NIAH including the curtilage, attendant grounds and setting of the structure are appropriate in terms of architectural treatment, character, scale, and form, and is not detrimental to the special character and integrity of the structure and its setting, save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal- the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.
AH-P-8	Ensure high quality architectural design of all new development relating to or which may impact on NIAH structures (and their setting) save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.
AH-P-9	Seek to protect, conserve and preserve vernacular structures and enhance the established character, forms, material features, and settings of vernacular buildings that are considered to be intrinsic elements of the character of a place, save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways., including: <ul style="list-style-type: none"> a. Vernacular and traditional style farmhouse buildings including Clachans and local authority labourer’s cottages. b. Vernacular buildings, groupings of buildings on Donegal’s Islands. c. Historic thatch structures as a key component of the built heritage of the county. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.
AYH-P-1	Save to the extent necessary to allow for the provision of strategic infrastructure projects including in particular the TEN-T Priority Route Improvement Project, Donegal: <ul style="list-style-type: none"> a. conserve and protect all forms of archaeological heritage including: <ul style="list-style-type: none"> i. National Monuments, ii. Structures on the Record of Historic Monuments (RHM), iii. the Record of Monuments and Places (RMP) iv. Sites and Monument Record (SMR), v. Historic Graveyards and environs, vi. Historic Towns, vii. Historic battlefield sites, viii. Unrecorded archaeology ix. Industrial and post-medieval archaeology; x. Underwater archaeology and xi. The settings of such heritage in accordance with the publication Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999); and b. Conserve and Protect Zones of Archaeological Protection located in Urban areas of Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullan and St. Johnston as identified in the Record of Monuments and Places including requiring the carrying out of archaeological assessment prior to the granting of permission and the imposition of archaeological monitoring planning conditions.

	The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provisions apply in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.
AYH-P-2	Save to the extent necessary to allow for the provision of strategic infrastructure projects including in particular the TEN-T Priority Route Improvement Project, Donegal, p Protect existing access to, and facilitate appropriate new public access, informational and visitor infrastructure for, archaeological heritage (including signage, parking, pedestrian access, commemorative memorials, and interpretative facilities) where such development would not be detrimental to the character or setting of said heritage where statutory consent has been obtained from the National Monuments Service and where the development would not otherwise negatively impact on traffic safety, local residential amenities, natural environment or the visual or scenic amenities of the area. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways
AYH-P-3	Save to the extent necessary to allow for the provision of strategic infrastructure projects including in particular the TEN-T Priority Route Improvement Project, Donegal, e Ensure that development proposals affecting archaeological heritage sites shall: <ol style="list-style-type: none"> Sensitively incorporate archaeological heritage Preserved In Situ in a manner which is compatible with the protection and proper management of such heritage and its setting including adequate safeguards from damage/vandalism and for public safety and suitable informational signage. Be accompanied by a long-term management plan that incorporates appropriate protections for the heritage site. Provide appropriate informational signage regarding any archaeological heritage which has been identified and Preserved by Record during the course of construction to an agreed standard with Donegal County Council and the National Monuments Service. The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provision applies in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.
(All of the above are considered to be material alterations.)	

DCDP-183 Department of Housing Local Government and Heritage

Biodiversity

Submission Summary

In summary the Department makes specific recommendations in relation to the following categories:

1) **Amending existing policies:**

- Removal of TEN-T Provisions in Biodiversity Policies.
- BIO-P-1: Additional text regarding protection of animal and plant species and landscape features.

- BIO-P-3: Removing 'Where justified' and inclusion of site-specific Biodiversity management plan.
 - BIO-P-4: Requirement for invasive species-specific control programme.
 - BIO-P-5: Inclusion of requirement for native pollinator friendly planting etc.
- 2) Inserting new policies/objectives regarding new biodiversity protections:**
- New policy to protect Donegal's dark sky/avoid adverse light pollution.
 - New policy to ensure that the location/design and new tourism and recreational active infrastructure proposals do not have a significant adverse impact on biodiversity.
 - Manage road verges to enhance biodiversity in accordance with the All Ireland Pollinator Plan.
- 3) Inserting new policies/objectives reiterating statutory requirements and setting out planning practice issues:**
- Specific requirement to carry out AA, SEA, EIA and EcIA for any downstream plans and projects.
 - Implement Biodiversity Action Plan 2017-2021 and National Peatlands Strategy.
 - Referencing Natura Impact Report Mitigation Measures in planning conditions.
 - Requiring submission of Ecological Impact Assessment (EcIA) where there are potential impacts to habitats or species.
 - Require wildlife survey of buildings planned for restoration or demolition.
 - Monitoring biodiversity loss and enhancement as a result of any development proposal.
 - Ensure all downstream plans and projects will be required to undertake AA, SEA, EIA, and EcIA.
 - Implement Tree Preservation Orders.
- 4) Inserting new policies/objectives committing to carrying out certain biodiversity strategies/studies and other actions.**
- Preparation of Donegal Biodiversity Action Plan and appointment of a Biodiversity Officer.
 - Prepare a Countywide Swift Survey.
 - Create a database of Local Biodiversity Areas and ecological networks.
 - Develop a Green Infrastructure (Ecological Corridors) Strategy.
- 5) Inserting new policies/objectives regarding presentational Issues:**
- Listing and displaying all heritage sites including pNHAs
- 6) Non-material amendments of existing policy.

Chief Executive's Response

The above categories are responded to below:

1) Amending Existing Policies:

The issues regarding the TEN-T PRIPD specific policy provisions are responded to in the response and associated recommendation for the DCDP-211 Office of the Planning Regulator submission above. The amendments to Policies BIO-P-1, BIO-P-3, BIO-P-4, and BIO-P-5 are generally agreed and recommended amendments are set in the CE Recommendation below.

2) Inserting New Policies Regarding New Biodiversity Protections:

It is considered that: a policy should be added regarding adverse levels of light pollution, a policy should be added regarding the location and design of new tourism and recreational/active infrastructure, and BIO-P-5 should be amended regarding managing road verges to enhance biodiversity in accordance with All Ireland Pollinator Plan, as recommended below.

3) Inserting new policies/objectives reiterating statutory requirements and setting out planning practice issues:

It is agreed a policy should be added regarding implementing any extant National Biodiversity Action Plan and Peatlands Strategy. The planning authority is already required to adhere to all statutory requirements (e.g. AA, SEA, EIA) and it is considered that these requirements do not require repetition in policy. Otherwise, it is considered that requiring the preparation of specific studies (e.g. EcIA, Wildlife Surveys etc), listing NIR mitigation measures in planning conditions etc, are matters of normal planning practice and do require the addition of specific policy provisions to implement same. Finally, as the making of Tree Preservation Orders is

already provided for in the Planning Act it also does not require an additional specific policy provision.

- 4) **Inserting new policies/objectives** committing to carrying out certain biodiversity **strategies/studies and other actions.**

A Biodiversity Officer has recently been appointed by the Council. It is otherwise considered that the carrying of certain Biodiversity related strategies and studies are not specifically a land use/development planning policy issue.

- 5) **Inserting new policies/objectives** regarding **presentational Issues:**

In the interests of conciseness, and the fact that ecological designations are already mapped and listed in either the Environmental Report of the CDP 2024 and/or at other readily accessible locations (e.g. the Council's planning application mapviewer and on www.npws.ie) it is not considered necessary to list or map such designations within the plan.

Chief Executive's Recommendation 11.2

Make the following amendments to the Draft CDP 2024:

Amend the Following Policies as follows (existing text in black; **new text in blue**; ~~text to be deleted in strikethrough~~)

(Note: These amendments are in addition to any other amendments to these policies otherwise recommended in this CE Report)

BIO-P-1

- b. Provide for the **strict** protection of animal and plant species listed in Annex IV of the EU Habitats Directive.
- c. ~~Manage~~ **Protect and enhance** features of the landscape (such as rivers, riverbanks, field boundaries, ponds and small woods) which are of major importance for wild fauna and flora and the ecological coherence of the Natura 2000 network.

(This is considered to be a material alteration.)

BIO-P-3

- a) Protect, ~~where justified~~, features of local biodiversity value (e.g. hedgerows/field boundaries, trees, woodlands, wetlands, water bodies, riverbanks and peatlands) which make a significant contribution to the biodiversity, ecological connectivity, and associated visual amenity and/or rural character of the area.
- b) Require, ~~where justified~~, that developments otherwise maximise the retention of and suitably integrate such features. In this regard proposals for the removal of existing roadside hedgerows/field boundaries for new developments in rural areas will only be permitted in so far as is necessary to safeguard public safety and any remaining portion of those features identified above not so required shall be retained.
- c) Require that development proposals provide biodiversity enhancement measures (e.g. native tree and hedgerow planting, and nature-based water management solutions).
- d) Require that large-scale developments result in no net biodiversity loss; **and include a site-specific comprehensive Biodiversity Management Plan (BMP), as part of any planning proposal.**

This is considered to be non-material.

BIO-P-4

Ensure that any development proposals do not lead to the introduction or spread of invasive species. Where invasive species are present, development proposals ~~may~~ **will** be required to be submit an appropriate control and management programme **for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).**

This is considered to be non-material.

BIO-P-5

- a) Ensure that new developments do not have a significant adverse impact on pollinator habitat and species, including protecting rare pollinators ~~listed under the Wildlife Act~~ and maximizing the retention of ~~pollinator-friendly~~ habitats and providing biodiversity enhancement within new-development proposals where feasible.
- b) Require native pollinator-friendly planting and management regimes as part of planting/landscaping schemes for new public development, including green infrastructure, large scale residential and transport development.
- c) Manage road verges to enhance biodiversity in accordance with the All-Ireland Pollinator Plan.

This is considered to be non-material.

Insert the following New Objective/Policy**BIO-O-2**

To implement the objectives of any extant National Biodiversity Action Plan and National Peatlands Strategy in all aspects of the sustainable development of the county.

BIO-P-X

To avoid adverse levels of artificial level of light pollution in Donegal including by requiring, where appropriate, the use of warmer spectrum (<2200k), lower overall brightness, low, diffuse, fully cowed and smart lighting and the avoidance of lighting in dark areas around water, native vegetation, and used by bats, birds and nocturnal animals.

(These are considered to be material alterations.)

Amend the 3rd paragraph of Section 11.1.1 as detailed below:

Donegal has a wide range of biodiversity assets including habitats and species in protected Natura 2000 sites, Ramsar Wetlands Sites, Nature Reserves, Natural Heritage Areas, proposed Natural Heritage Areas, extensive blanket bog covering significant parts of the county, and within woodlands, hedgerows, within urban areas and aquatic environments in the wider environment.

This is considered to be a non-material.

Archaeology**Submission Summary**

Notes that archaeological, built and underwater heritage is a unique and special resource which needs to be protected whilst continuing to facilitate practical developmental requirements and states this can be done by implementing related policies. Notes the legal protection for archaeology.

Expresses concern in relation to the TEN-T Provisions in AYH-P-1,2 & 3 and recommends their removal.

Also notes that the AYH-P-1 requires the carrying out of archaeological assessment prior to granting and the implementation of archaeological monitoring planning conditions and recommends this is updated as follows and highlights OPR guidance in this respect.

'... requiring the carrying out of an archaeological assessment prior to the granting of permission and the undertaking of additional archaeological mitigation where required (e.g. more extensive testing, excavation or licensed archaeological monitoring) to inform the planning application or, if appropriate, the imposition of similar archaeological mitigation (more extensive testing, excavation or licensed archaeological monitoring) as conditions of planning.'

Chief Executive’s Response:

It is agreed that archaeological, built and underwater heritage is a unique and special resource, and it is considered that the archaeological policies of the plan provide for its protection and whilst continuing to facilitate practical developmental requirements.

The issue of the TEN-T Provisions within policies AYH-P-1,2 & 3 is responded to the response and associated recommendation to the OPR submission detailed above.

Otherwise the above amendment to AYH-P-1 regarding archaeological mitigation is considered reasonable and provides useful clarification with regard to the measures which may be taken by the planning authority to protect zones of Archaeological Protection.

Chief Executive’s Recommendation 11.3:

Amend Policy AYH-P-1 b. as follows. (existing text in black; ~~text to be deleted in strikethrough~~, new text in blue)

- b. Conserve and Protect Zones of Archaeological Protection located in Urban areas of Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullan and St. Johnston as identified in the Record of Monuments and Places including ~~requiring the carrying out of archaeological assessment prior to the granting of permission and the imposition of archaeological monitoring planning conditions~~ **requiring the carrying out of an archaeological assessment prior to the granting of permission and the undertaking of additional archaeological mitigation where required (e.g. more extensive testing, excavation or licensed archaeological monitoring) to inform the planning application or, if appropriate, the imposition of similar archaeological mitigation (more extensive testing, excavation or licensed archaeological monitoring) as conditions of planning.'**

(This is considered to be a material alteration.)

DCDP-67 Mark Carlin

Submission Summary

Queries whether EHSA, HAS and MSA areas take precedence over other rural areas.

Chief Executive Response

All rural housing applications will be considered having regard all relevant policies and objectives of the CDP 2024-2030 including any relevant landscape protection policies. However, there are no blanket prohibitions for rural housing developments in any scenic amenity designations within the plan and thus such developments will be open to consideration in all such designations.

DCDP-72 Friends of Dunree

Submission Summary

This submission identifies a number specific suggestions in relation to the Fort namely: no entrance fee, refurbishment of the old billets, provision of road train to access the Top Fort, the refurbishment of the black stone engines and 3 generators, the establishment of a marine centre, reducing the amount of concrete proposed for the top fort, ensuring minimal disruption to the ecosystem during development, maintenance of in situ client working at the fort the and upgrading of the roads leading to the fort.

Chief Executive Response

The above suggestions are noted and acknowledged. As a strategic land use planning document, the plan sets out a vision for the overall proper planning and sustainable development and in this regard does not set out specific requirements for individual heritage/tourism sites. Nevertheless, the importance of Dunree Fort is highlighted in Section 14.10 and 18.6.1 of the plan, Policy TOU-P-1 facilitates the development of signature/strategic tourism experience attractions such as Dunree

Fort and built heritage policies AH-P-3 and AH-P-7 would provide for the appropriate development of the RPS/NIAH assets within the Fort.

DCDP-72 Fermanagh and Omagh District Council

Submission Summary

States that the plan identifies the threats to biodiversity, habitats and species, and welcomes the desire to protect the natural environment which is stated will have positive implications on both sides of the border. The submission, notes BIO-P-3 (Protection of features of local biodiversity value), supports Policy BIO-P-5 (Pollinator habitats and species), and welcomes BIO-O-1 (Preserve and enhance the biodiversity of the county). Additionally, it supports DCC's approach to protect, manage and conserve Donegal's landscape. It also supports the approach to the historic environment and the promotion of the reuse of existing built heritage.

Chief Executive Response

The support from Fermanagh and Omagh District Council for the Biodiversity, Landscape and Built Heritage policies/provisions of the Draft CDP 2024 is acknowledged and welcomed including the recognition of the positive cross border implications of same.

DCDP-74 Ronald Ferguson

Submission Summary

The broad issues raised by this submission have been summarized in the Climate Change themed response.

Chief Executive Response

The broad issues raised by this submission have been responded to in the Climate Change themed response.

DCDP-104 Land Development Agency

Submission Summary

States that the adaptive reuse of buildings extends buildings life, avoids demolition waste, encourages energy reuse and provides socio-economic benefits. Expresses concern about challenges in reusing protected and heritage buildings due to funding, recognises that Local Authorities play a pivotal role in administering funding streams at local level. States it would welcome policies which support the LDA in collaboration with the Council on an integrated approach, initiatives and funding streams to enable bring back into use of heritage buildings.

Chief Executive Response

Section 11.3.1 of the Draft Plan emphasises the importance of reusing our existing built heritage in achieving carbon neutrality, climate resilience and a circular economy. The Council has a proven track of reusing/regenerating our existing built heritage stock in collaboration with relevant stakeholders and through a variety of funding streams. However, it is considered that AH-O-2 could be amended to emphasise this collaborative integrated approach.

Chief Executive's Recommendation 11.4

Amend Objective AH-O-2 as follows (existing text in black; new text in blue)

Promote the sustainable and sensitive re-use of the existing built heritage as a positive response to climate change, and promote the circular economy and climate mitigation and adaptation through proper maintenance, repair and appropriate retrofitting, adaptive re-use and regeneration employing best conservation practice. **This objective will be pursued on a collaborative and integrated basis in partnership with all relevant stakeholders and through all available funding mechanisms.**

(This is considered to be a material alteration.)

DCDP-129 John Mulcahy**Submission Summary**

States that the EU shellfish Directive was designed to protect the aquatic habitat of bivalve and gastropod molluscs and notes there are 12 shellfish waters in Donegal. States that Pacific Oysters have the potential to display native species and modify habitats. Expresses concern that Giga are overwhelming the habitat in Lough Swilly. States that the Department of Agriculture Food and the Marine are continuing to entertain licences to cultivate Giga, this is irresponsible and against the preferences of local residents, and Giga Oyster trestles are unsightly and dangerous. Notes that the Council has an obligation to protect Shellfish Waters. Contends that licence proposals have been made between Inch Island and Newtowncunningham Quay shore pier, Linsfort Beach, Ballyness Bay, and Trawbreaga Bay with minimal consultation. States that Development Plan should act to restore water quality and remove invasive species.

Chief Executive Response

The above comments in relation to Giga Oyster production is noted. The functional area of the remit of the County Donegal Development Plan 2024-2030 extends to the landward side of the High Tide Mark. In future Designated Marine Area Plans may be prepared covering the nearshore area. However, the Department of Agriculture, Food and the Marine (DAFM) remains the licencing authority for Aquaculture. Otherwise, Section 8.2 of the plan highlights the importance of improving water quality and sets out a range of development management policies in this regard.

DCDP-135 Joseph Brennan**Submission Summary**

Expresses dismay that policy NH-P-20 of the CDP 2018 to ensure the Protection of Cró na mBroanáin Red Grouse Sanctuary has been omitted in the Draft CDP. The 2007 Red Grouse National Survey pinpointed that this was one the remaining strongholds for the Red Grouse. The Irish Red Grouse is now recognised as a distinct sub species.

Chief Executive Response

The above omission of policy NH-P-20 (contained in the CDP 2018) to specifically protect the Cró na mBroanáin Red Grouse Sanctuary is noted and acknowledged. In view of the overall decline of Red Grouse cited in previous studies and the listing of the species in the Red List Birds of Conservation Concern in Ireland, Annex II and III of the EU Birds Directive, and specific policy protection afforded to said sanctuary in the CDP 2018 it is agreed that protection for said sanctuary should also be provided for in the CDP 2024-2030. Accordingly, it is considered that Policy BIO-P-2 should be amended as set out below.

Chief Executive's Recommendation 11.5**Amend Policy BIO-P-2 as set out below.** (existing text in black; new text in blue)

Ensure that all developments seek to conserve/protect the qualifying interests of Ramsar Sites, Nature Reserves, Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), [the Cró na mBroanáin Red Grouse Sanctuary](#) and any species protected under the Wildlife Act save to the extent necessary to provide for strategic infrastructure projects including the TEN-T Priority Route Improvement Project, Donegal.

(This is considered to be non-material.)

DCDP-145 Inishowen Development Partnership**Submission Summary**

This submission expresses support for natural built heritage and contains the EcoCarn Biodiversity Action Plan. This Action plan contains biodiversity audits of 6 sites (Carndonagh Woods, Moss Road, Barrack Hill, Carndonagh GAA pitch and Donagh and Glennagannon Rivers), sets out a range

of site specific actions for said sites (e.g. co-operation with landowners, signage, fencing, installation of bird and bat boxes, planting water quality testing, tacking and monitoring invasive species) and set out 5 general actions (i.e. invasive species management, filling hedgerow gaps, wetland and pond creation, no now periods, and sensitive development of trails and paths).

Chief Executive Response

The support for natural and built heritage is noted and acknowledged. The EcoCarn network is to be commended on the preparation of such a comprehensive and detailed Action Plan. This Plan will be an invaluable resource as the Authority goes through the process of preparing a new Local Area Plan for Carndonagh, which process is programmed to commence in Spring, 2024.

DCDP-190 Wind Energy Ireland

This submission raises landscape and biodiversity related issues which have been responded to in Natural Resource Development Section of this report.

DCDP-223 John and Rory Shevlin

Submission Summary

Requests that the subject lands be re-designated from Especially High Scenic Amenity (EHSA) to High Scenic Amenity (HSA) (See map below)

Submission from Canavan Associates notes that the landholding was excluded from the EHSA designation in the CDP 2018. States that the submission is made on behalf of 2 brother who have depended on and established previous caravan accommodation tourism ventures. Details that the site is at low elevation, 9.7ha, bounded by the L-10322, is gently rising to the southern boundary and is close to the coastal edge which is also a SAC. Notes that the site has existing roads and related infrastructure, there are several other caravan parks in the vicinity, has numerous one-off holiday homes and developments. State that the site lies outside any Natura 2000 site and Crockglass Hill restricts the view of the site from the Wild Atlantic Way.

It expresses an opinion that the redesignation of the lands as EHSA within the CDP 2018 was a mistake and the EHSA designation would be restrictive for any tourism development. Notes that definition of EHSA within the CDP 2018. States that the site is within the Rosguill Gaeltacht Landscape Character Assessment area which describes the area as *a diametric landscape consisting of mountains, plains, dunes and agricultural lands encompassed by a long and varying coastal edge*. Notes the content of the CDP SEA. Contends that the LCA and the scenic amenity maps are not transparent and do not synchronise, the LCA is not a site specific capacity assessment, and there is no clear landscape sensitivity/capacity analysis which justifies the EHSA designation. Opines that the that the high concentration of holiday homes detract from landscape quality and value and that the area is no longer a high quality landscape. State that the site already is a development site with hardstands and tracks, has a low profile and is hidden in views from the south and south west. States that the Natura 2000 sites, which can be synonymous indicators of natural and high value landscapes, potentially worthy of EHSA designation lie outside same.

The submission contends that the EHSA designation and associated CDP policies prohibits most development, including tourism and is effectively land sterilization. Reiterates that the owners have been involved in caravan and related accommodation provision for several decades and the Draft CDP supports Farm diversification in principle, and caravans are of seasonal occupancy. Further argues that the proposed rezoning would align with the plan's tourism and economic development policies.

Associated submission form Joe Bonner Planning Consultant notes that Downings and Melmore head are very popular tourist destinations, contain several large caravan parks, previous planning policies permitted holiday homes to a point which the EHSA landscape designation is not an accurate reflection of the Melmore Head and Downings area. States that in the CDP 2012-2018 the

Shevlin's land was excluded from the EHSA area. Requests that the scenic designation on the Shevlin's landholding be changed from EHSA to HSA as part of the landholding is brownfield land that has been development over a period of several decades and is not a natural landscape.

Chief Executive Response

These subject lands are located in the Rosguill Peninsula and adjoin the road to the popular tourism destination of Tra Na Rossan Beach which are adjacent to the Wild Atlantic Way/Atlantic Drive. The lands are located within a wider open and exposed coastal landscape of beaches, hills, dunes and headlands, which is widely regarded for its scenic quality. The lands consist of semi sloping natural grassland and shallow blanket bog and an unauthorised Mobile Home Park (and other roads and hard cored area).

EHSA Areas are defined in the plan as:

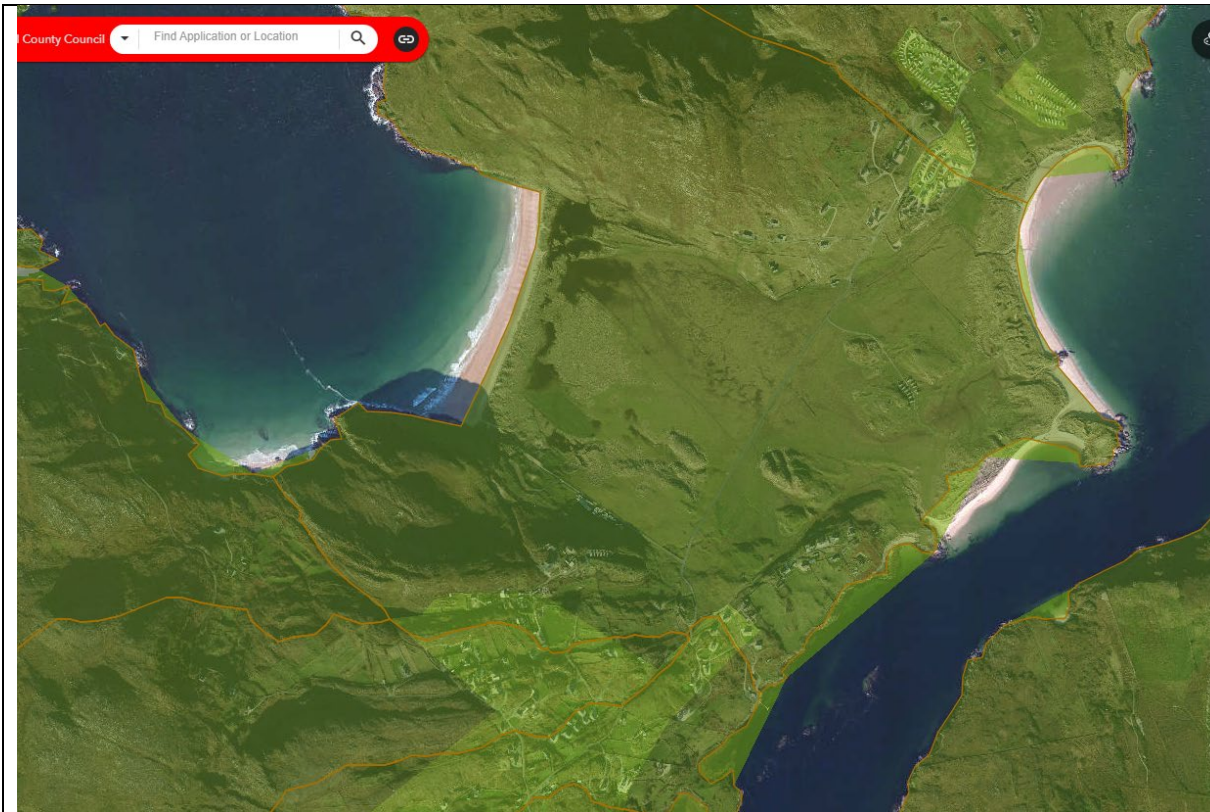
Sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.

HSA Areas as are defined in the plan as

Landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and form a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan.

In the first instance it is considered that the presence of the unauthorised development on the site should be disregarded from any assessment of the scenic landscape designation. The redesignation of the lands from EHSA to HSA in the CDP 2018 was not recommended by the Council's Executive. The inference that the non-designation of the site as a Natura 2000 site means the site is not synonymous with high value landscape is rejected as such designations are based on ecological, not landscape, considerations. In addition, the question of what developments may be acceptable within EHSA areas under the plan is considered separate from whether the lands should otherwise be designated as EHSA.

As indicated above the overall scenic quality of the Rosguill area is highlighted by its designation as part of the Wild Atlantic Way tourism route, the number of seasonal visitors and the popularity of the adjacent Tra Na Rossan Beach. An examination of the scenic amenity mapping and underlying aerial photography to the Council indicates that the Rosguill peninsula is divided into distinct areas containing cluster of housing and mobile home development which are designated as HSA, and largely undeveloped open and exposed, hillsides, headlands and coastal plains which are designed as EHSA. The subject lands are located on a largely undeveloped (save for on site unauthorised developments) open and exposed hillside adjoining the coastal plain to the east of Tra Na Rossan beach which displays a natural character and has limited capacity to assimilate physical development. It is visually distinct and separate from the cluster of dwellings on higher ground to the southeast. It is considered that these landscape components are intrinsic elements of, and give rise to, the high quality landscape reflected in this EHSA designation. Consequently, it is considered that the area in which the subject lands are located matches the character of the wider EHSA landscape in this area and therefore should remained designated as an EHSA area.



Furthermore, it is considered that the degradation of the landscape quality in certain parts of the Rosguill peninsula by clusters of mobile homes and holiday homes in HSA areas strengthens the need to retain the existing landscape designation in the adjoining more scenic EHSA areas largely unaffected by authorised development. In this regard it is considered that facilitating tourism development on the subject lands would fundamentally undermine the landscape assets on which Donegal's tourism product depends.

Chief Executive's Recommendation 11.6

It is not recommended that the subject lands are redesignated from Especially High Scenic Amenity (EHSA) to High Scenic Amenity (HSA).

DCDP-224 Futur Energy Ireland

This submission raises landscape and biodiversity related issues which have been responded to in Natural Resource Development Section of this report.

DCDP-231 Roger Garland

Submission Summary

This lengthy and complex submission makes a multitude of proposals regarding natural and built heritage as summarised below.

Archaeological Heritage

- States that the plan fails to comply with/take account the Planning Act, other development plans, Heritage Act 1995, Heritage Ireland 2030.
- Does not support the preamble to the archaeology policies.
- Suggests policies regarding signage and access to archaeology, best practice for archaeological excavations, preservation in situ of archaeology, community archaeology initiatives, archaeological assessments etc.

- States that the plan should be framed around the publication: Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999);
- Suggest policies regarding, protecting unrecorded monuments, protecting battlefield sites, zones of archaeological potential, Recorded Monuments, Historic Monuments, National Monuments, setting of monuments, etc.
- Suggests that a map of Recorded Monuments should be included.

Biodiversity.

Suggests objectives/policies to:

- Work with relevant agencies regarding cutaway bogs.
- Support/implement the National Peatlands Strategy.
- Restore raised and blanket bogs.
- Conserve peatlands areas, particularly those subject to ecological designations.
- Integrate natural buffers as part of Greenway development.
- Implement the Donegal Heritage Plan.
- Preserve open/unfenced areas.
- Protect wetlands, NHAs, and Ramsar Sites.
- Protect Natura 2000 sites and implement the Habitats Directive.

Chief Executive Response

It is considered that the existing Draft Plan and the recommended amendments contained herein provide a robust, concise, and workable framework for the protection of Donegal’s natural, built, and archaeological heritage. In this regard it is specially noted that:

- The archaeology policies protect a wide range of such heritage including National Monuments, Recorded Monuments, Battlefield sites, unrecorded archaeology in accordance with the publication Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999).
- The biodiversity policies protect a comprehensive range of such heritage including SACs, SPAs, NHAs, Ramsar Sites, Wetlands, features of local biodiversity value etc in accordance with all relevant statutory requirements.

DCDP-240 SSE PLC

This submission raises landscape and biodiversity related issues which have been responded to in Natural Resource Development Section of this report.

DCDP-255 Dominic McGroddy

Submission Summary:

Requests redesignation of 2 pockets of his lands from Especially High Scenic Amenity (EHSA) to High Scenic Amenity (HSA):



North of the County Road at Dundoan Lower

Contents a decision was taken to impose a blanket designation on the entire headland of Melmore as EHSA. States that certain pockets containing caravan parks have been downgraded. Notes that the subject lands meet the criteria of HSA, consist of grazing lands, low wall steads and stone ditches and are located at the foothills of the Melmore Head Hills. Further states that Melmore Caravan Park is located on both side of the county road and there are 8 houses to the north and south of the lands. Opines that the reclassification would not compromise the overall designation, and the character of the lands would remain without any threat.

Portion of Lands Shaded in Black South of the County Road at Dundoan Lower

States that the lands are grazed at present, some of the lower lands do not have any significant biodiversity value, and are intermittently grazed by cattle and sheep. Notes there is a cluster of roadside development, with a mobile home park, several dwellings, and a cattle pen. Opines that the lands do not constitute the definition of EHSA but are more accurately described as HSA, and the development in the immediate area show that a blanket classification of the area as EHSA is not balanced or reflective of the development pattern as Dundoan Lower.

Chief Executive Response

The subject lands are located within an open and exposed coastal landscape of hills, coastal plains, dunes/beaches, headlands as well as scattered houses and mobile home developments within the Rosguill peninsula which is still widely regarded for its scenic quality. The area to the north of the county road is locally elevated, moderately sloping, open and visually exposed. It consists of semi-improved grasslands, with low ditches and wallsteads. The area to the south of the road is open and exposed and consists of a slightly sloping semi-improved grassland on the upper part and the sand based coastal plain on the lower part.

The definitions for EHSA and HSA areas are detailed in the response to DCDP 223 above. EHSA area are inter alia defined as being 'sublime natural landscapes' 'synonymous with the identity' of Donegal and having 'extremely limited capacity to assimilate additional development'.

An examination of the scenic amenity mapping and underlying aerial photography available on the Council's mapping system clearly indicates that that the Rosguill peninsula is divided into distinct areas containing cluster of housing and mobile home development which are designated as HSA, and largely undeveloped open and exposed, hillsides, headlands and coastal plains which are designed as EHSA.



The subject lands, in consisting of open, exposed, and undeveloped, hillside and coastal plains, are clearly visually distinct and separate from the adjoining pockets of more intensive mobile home development along the local road to the north which are designated as HSA. Furthermore, said landscape components of the subject site are considered intrinsic elements of, and give rise to, the sublime quality of the host EHSA landscape. Consequently, it is considered that the area in which

the subject lands are located matches the character of the wider EHSA landscape in this area and therefore should remained designated as an EHSA area.

Chief Executive’s Recommendation 11.7

It is not recommended that the subject lands are redesignated from Especially High Scenic Amenity (EHSA) to High Scenic Amenity (HSA).

DCDP-261 TRE Energy Holdings Ltd

This submission raises landscape related issues which have been responded to in Natural Resource Development Section of this report.

DCDP-262 Northern and Western Regional Assembly

Submission Summary

Notes that the approach to landscape protection is generally reflective of the current CDP 2018 and the 2016 LCA remains a useful tool in support planning policy and landscape classification. Further states that that 23% of the landmass is designated EHSA and generally the value and character of the maintains, uplands and coastal headlands are well protected in terms of policies and objectives.

In relation to built heritage notes the ongoing work on adding 2000 NIAH building to the RPS and this will be done within the plan’s lifetime.

Chief Executive Response

The broad support to landscape protection in the plan is noted and welcomed.

Submissions From Secondary School Students at:

- St Eunan’s College, Letterkenny – DCDP-277 refers.
- St Columba’s Collage, Stranorlar - DCDP-278 refers.
- Rosses Community School - DCDP-279 refers.
- Colaiste Ailigh, Leitir Ceanainn - DCDP-280 refers.
- Deelee College, Raphoe - DCDP-281 refers.
- Crana College, Buncrana – DCDP-284 refers.

Submission Summary

As part of the Public Consultation on the Draft CDP all Secondary Schools in Donegal were invited to participate on a presentation and feedback session on the Draft CDP of which the above schools responded. This session included a Group based feedback exercise including a specific Question “What areas of Donegal’s Landscape do you think need to be Protected by the Plan” to which the students were asked to provide their feedback on large maps of Donegal.

Collectively, the feedback provided by the students emphasises need to protect such areas as:

- Mountainous areas such as the Derryveagh Mountains, Bluestack Mountains, and Slieve Sneacht.
- Coastal areas including key beaches around our coastline.
- Key Discovery Points along the Wild Atlantic Way such as Sliabh Liag, Fanad Head and Malin Head.
- Parts of the West Donegal Gaeltacht.
- Other assorted areas such as the Fand Peninsula, the Finn Valley, Cark Mountain, Lough Derg etc

Chief Executive Response.

The feedback from students on this important question is acknowledged and greatly welcomed. The Draft CDP 2024 designates Moderately High Scenic Amenity, High Scenic Amenity and Especially High Scenic Amenity areas in Donegal. Specifically the Draft Plan designates some of our most sublime mountainous and coastal landscapes including the Derryveagh and Bluestack Mountains, Sliabh Liag and our Islands as Especially High Scenic Amenity. In turn Policies L-P-1, L-

P-2 and L-P-3 safeguard and protect areas of Especially High Scenic Amenity, Moderate and High Scenic Amenity and Donegal’s coastline respectively. Consequently, if said policies are fully implemented, it is considered that the vast majority of the landscapes identified by the students will be protected by the plan.

Internal Review

An internal Executive review of the Built and Natural Heritage chapter identified areas where policy could be refined and strengthened. These are addressed below.

(Existing text in black; new text in blue; text to be deleted in strikethrough).

Issue	Policy Suggestions
<p>There is currently no protection or policy in relation to historic building stock (e.g. traditional building built before 1960’s including buildings which are prevalent within the streetscape of our towns and villages) within the Draft CDP</p>	<p>Insert the following text into 11.3.5</p> <p><i>The historic building stock in County Donegal can be defined as traditional buildings built with solid stone walls and other natural materials such as wood, slate and lime . These buildings uniquely reflect the social and cultural history of the area to which they belong and make a major contribution to the character of our countryside, villages and towns. In order to prevent further loss or destruction of this important heritage asset, there is a presumption against the demolition of traditional buildings which appear on historic maps (i.e. 1st , 2nd and 3rd edition Ordnance Survey). The Plan supports the appropriate re-use and sympathetic extension to these structures within the County to meet sustainability goals and to respect their important heritage value.</i></p> <p>(This is considered to be non-material.)</p> <p>Amend Objective AH-O-1 as follows: Conserve, manage, protect and enhance the architectural heritage of Donegal namely Protected Structures, Architectural Conservation Areas, NIAH structures, designed landscapes and historic gardens, vernacular, historic building stock industrial and maritime built heritage, character and setting of such structures.</p> <p>(This is considered to be non-material.)</p>
<p>Policy AH-P-7 currently sets out planning requirements for developments affecting NIAH but does not explicitly state that such structures should be protected.</p>	<p>Amend Policy AH-P-7 as follows: Protect NIAH structures by requiring Require that development of structures on the NIAH including the curtilage, attendant grounds and setting of the structure are appropriate in terms of architectural treatment, character, scale, and form, and is not detrimental to the special character and integrity of the structure and its setting, save to the extent necessary to provide for strategic infrastructure projects including the TEN-T Priority Route Improvement Project,</p>

Issue	Policy Suggestions
	<p>Donegal.</p> <p>(This is considered to be non-material.)</p>
<p>Section 11.3.5 of the Draft Plan describes and provides certain policy protections to vernacular buildings but does not do the same for the similarly important Historic Traditional Building Stock.</p>	<p>Amend the Heading for Section 11.3.5 As Follows. 11.3.5 Vernacular Architecture and Historic Traditional Building Stock</p> <p>Insert the following text before the 5th Paragraph of Section 11.3.5 Donegal traditional building stock includes all solid wall buildings that are constructed using natural permeable natural materials such as stone and lime mortars.</p> <p>Amend Policy AH-P-9 Seek to protect, conserve and preserve vernacular structures, historic building stock and enhance the established character, forms, material features, and settings of vernacular buildings and historic building stock that are considered to be intrinsic elements of the character of a place, save to the extent necessary to provide for strategic infrastructure projects including the TEN-T Priority Route Improvement Project, Donegal, including:</p> <ol style="list-style-type: none"> a. Vernacular and traditional style farmhouse buildings including Clachans and local authority labourer’s cottages. b. Vernacular buildings, groupings of buildings on Donegal’s Islands. c. Historic thatch structures as a key component of the built heritage of the county. d. Historic Building Stock such as traditionally stone built buildings. <p>(This is considered to be non-material.)</p> <p>Amend Policy AH-P-10 Seek to ensure that conversions or extensions to vernacular buildings/traditional historic building stock and the provision of new adjoining buildings shall be of a scale and form that complements the existing building and ensures that the distinctiveness and character of the vernacular form is retained and respected.</p> <p>(This is considered to be non-material.)</p>
<p>Need to ensure that energy efficiency upgrades/retrofitting is undertaken in a manner which is sensitive to built heritage.</p>	<p>Insert New Policy AH-P-3</p> <ul style="list-style-type: none"> • Promote the maintenance and appropriate re-use of the existing buildings stock of buildings with architectural merit as a more

Issue	Policy Suggestions
	<p>sustainable option to their demolition and replacement'</p> <ul style="list-style-type: none"> • Ensure that measures to upgrade the energy efficiency of protected structures and traditionally built historic structures are sensitive to traditional construction methods, employ best practice and use appropriate materials and methods that will not have a detrimental impact on the material, functioning or character of the building. <p>(This is considered to be a material alteration.)</p>
<p>There is significant built heritage including both buildings and non structural elements within our town and villages which merit protection. However, there are currently no policies to reflect this in the town and village chapter.</p>	<p>Insert new Policy TV-P-7 Protect and enhance the unique physical character of historic town and village centres including other non-structural elements of our towns and village that contribute to their unique character and identify such as historic walls and street furniture.</p> <p>(This is considered to be a material alteration.)</p>
<p>There is currently no mention/emphasis on heritage led regeneration in the town and village chapter.</p>	<p>Insert new Policy TV-P-8</p> <ul style="list-style-type: none"> • Promote heritage -led regeneration in the County's towns and villages • Require that adaptative re-use of older buildings and historic centre heritage-led regeneration adheres to best conservation practice and principles. • There will be a presumption against the demolition of older buildings considered to be intrinsic elements of the character of a place where restoration or adaption is a feasible option. <p>(This is considered to be a material alteration.)</p>
<p>At present there are Failte Ireland projects etc that come through planning system are not sufficiently sensitive to the heritage asset. This policy seeks to strike an appropriate balance between enhancing the tourism product whilst not materially harming the intrinsic heritage asset on which it depends.</p>	<p>Insert New Policy TOU-P-7 To support and protect the built heritage assets that are the focus for tourism development to promote heritage led economic growth and regeneration whilst not adversely detracting from the built heritage assets or their setting. Any proposals shall respect features of the special architectural and historic character by appropriate design, materials, scale, and setting.</p> <p>(This is considered to be a material alteration.)</p>

Issue	Policy Suggestions
<p>The rural housing section concentrates on new build. Expand policy RH-P-7 to take re-use/rehabilitation of existing traditional housing stock</p>	<p>Amend RH-P-7 Refurbishment/Extension of Existing Vernacular Traditional Building Stock To consider proposals for the refurbishment of derelict vernacular traditional buildings (refer to definitions below) within rural areas, for use as either a permanent dwelling or as a holiday home, subject to (inter alia) the following criteria being satisfied:</p> <ol style="list-style-type: none"> a. The proposed development will provide for the retention of the majority of the existing building. b. Proposals for extensions shall in general, not exceed 150m² or 50% of the size of the original building respect the character and appearance of the traditional building. The design, size, height and finishes of the proposed refurbishment/ extension must respect the architectural character of the original building type unless otherwise agreed with the Planning Draft County Donegal Development Plan 2024-2030 Chapter 6 Housing Authority, and the finished building must otherwise be of a scale and form such that the development integrates effectively into the host landscape. c. Compliance with the terms of Policy RH-P-9 below. <p>(This is considered to be non-material.)</p>
<p>Chief Executive’s Response The comments and suggested policy/objective amendments in relation to traditional historic building stock, protection of NIAH structures, ensuring retrofits are sensitive to built heritage, protecting built heritage in our towns and villages, heritage led regeneration, protecting built heritage in tourism developments, and greater flexibility in relation to the extension of traditional building stock are considered reasonable and are therefore agreed</p>	
<p>Chief Executive’s Recommendation 11.8</p> <p>Amend/Insert the abovementioned policies/objectives as detailed above.</p> <p>Note these specific amendments are in addition to any other recommended amendments to these policies/objectives.</p>	
<p>Policy Issues and Suggestions Arising from Consultations with the Cultural Division.</p>	
<p>Summary of Issues Raised The Council’s Cultural Division made wide ranging suggesting regarding the Biodiversity Section of the Plan including, in summary:</p> <ul style="list-style-type: none"> • Change title to: ‘Natural Built and Archaeological Heritage’. • Include the Record of Protected Structures • Removing the TEN-T PRIPD Provisions in policies. 	

- Remove the phrase 'where appropriate'.
- Insert policy to support the Implementation of the Donegal Heritage Plan 2023-2030.
- Include Policy to protect the special built character and functions of the County's Heritage towns.
- Insert Policy to requiring surveys, drawings of RPS structures to be demolished etc.
- Insert Policy to correct incorrect information on planning applications for built heritage.
- Insert Policy that Council will use its powers to prevent deterioration of RPS and NIAH structures.
- Insert Policy to reduce rates for businesses operating in a RPS structure.
- Insert Policy to protect all remaining thatched structures.
- Amend Policies AH-P-4, AH-P-9 to strengthen same.
- Insert policy to identify and recognise the importance of historic and signature landscapes.
- Insert policy that traditional materials and high-quality workmanships are applied to the repair of heritage features.
- Amend T-P-8 historic railway corridor to include heritage protection.
- Insert policy regarding historic shop fronts.
- List historic graveyards in the CDP.
- Amend AYH-P-4 to list number of graveyards and remove the word appropriate.
- Adding references to online resources.
- Insert policy regarding community led archaeology initiatives.
- Insert policy regarding identifying archaeology at risk from Climate Change.
- Insert policy re referring PART VIII applications to the National Monuments Service and NPWS
- Insert Policy regarding protecting certain Pilgrim Paths.
- Insert policy regarding archaeological assessment and monitoring.
- Insert Policy to protect historic burial places and their settings.
- Insert policy to protect and preserve industrial and post medieval archaeology.
- Strengthen BIO-O-1
- BIO-P-1 Insert wording re Compliance with Flora Protection Order
- BIO-P-3 a. Amend policy to add text re biodiversity/ecosystems services.
- BIO-P-3 Add text re additional of new ecological corridors.
- BIO-P-3 c. Insert **Require and** at the start of the policy.
- BIO-P-3 d. Insert additional wording re No Net Biodiversity Loss.
- BIO-P-5 Insert text regarding actions to support the All Ireland Pollinator Plan.
- Insert Policy Regarding referencing EIA, SEAs, and AA and other ecological assessments to independent assessors.
- Inert Policy regarding the protection of wetland sites.
- Insert Policy regarding protection of Cró Na mBraonain Habitats and Grouse Sanctuary.
- Other non-material textual corrections.

Chief Executive Response

This CE Report agrees with recommends the inclusion of the Record of Protected Structures into the plan, the suggested amendments to BIO-P-1 b., BIO-P-3 a. and c. as detailed below, the proposed amendment to the Chapter's Title and policy protection for the Cró Na mBraonain Grouse Sanctuary.

Otherwise, it is considered that, subject to the amendments recommended in this report, the existing policy base within the Chapter provides a concise and appropriately robust policy framework for the protection of the Natural, Built and Archaeological Heritage. In this regard it is considered that the draft plan already provides adequate protections in relation to shopfronts, historic graveyard, historic thatched structures, industrial and post medieval archaeology and wetlands. Furthermore, policies to protect pilgrim paths or historic landscapes would be ineffective in the absence to detailed mapping to identifying same.

It is not considered necessary to add policies regarding detailed application requirements, referrals, planning conditions or the use of the planning authority's existing statutory powers as these are essentially planning practice rather than policy issues. The list of Historic Graveyards is available on the Council's website. Finally, whilst the reduction of rate for businesses operating in a RPS

structures may be desirable from a heritage perspective it is essentially not a land use/planning policy issue.

Chief Executive's Recommendation 11.9

Make the following amendments to the plan (existing text in black; new text in blue; text to be deleted in strikethrough).

Insert the following new policy:

AH-P-4

Preserve, protect and enhance the special built character and functions of the 'Heritage Towns' of Ardara, Ballyshannon, Merville, Ramelton and Raphoe.

Amend Policy BIO-P-1 b. as below.

Provide for the protection of animal and plant species listed in Annex IV of the EU Habitats Directive and the Flora Protection Order.

(These are considered to be material alterations.)

Amend Policy BIO-P-3 as below.

- a) Protect, ~~where justified,~~ features of local biodiversity value (e.g. hedgerows/field boundaries, trees, woodlands, wetlands, water bodies, riverbanks and peatlands) which make a significant contribution to the biodiversity, **biodiversity/ecosystem services**, ecological connectivity, and associated visual amenity and/or rural character of the area.
- b) Require, ~~where justified,~~ that developments otherwise maximise the retention of and suitably integrate such features **and provide new ecological corridors where appropriate** In this regard proposals for the removal of existing roadside hedgerows/field boundaries for new developments in rural areas will only be permitted in so far as is necessary to safeguard public safety and any remaining portion of those features identified above not so required shall be retained.

(These are considered to be non-material.)

Note these specific amendments are in addition to any other recommended amendments to these policies/objectives.

Make the following Non Material Amendments:

- Amend title of the Chapter to 'Natural Built and Archaeological Heritage'
- Insert Record of Protected Structures into the plan (See OPR submission response).
- Insert word *NGO* in Section 11.1.1
- Correct Title of Section 11.4.2 to Sites **and Monuments Record**
- Section 11.4.2 1st Bullet point: replace architectural with **archaeological**

Section 12: Community Development

Dept. of Education DCDP-264		
<p>School Capacity Overview</p> <p>The submission provides an overview on how the Department projects school roll needs. In this context, it then summarises the position in relation to the key settlements identified in the Core Strategy as follows:</p>		
	Primary	Post-Primary
Letterkenny	Potential future requirement for the provision of additional primary school places if population projections being met etc.	Potential extra requirement could be met by planned expansion of existing facilities, notably at St. Eunan's College and Errigal College.
Buncrana	Potential extra requirement could be met by expansion of existing facilities.	Projected modest increase in enrolment projected and could be accommodated by planned new three-school campus.
	The Department also notes the zoning in the Town Plan of the Community Infrastructure site on Causeway Road ' <i>identified a result of collaborative work between the Dept. and DCC leading to acquisition in 2021.</i> '	
Ballybofey/Stranorlar	Potential extra requirement could be met by expansion of existing facilities.	Potential extra requirement could be met by planned expansion of existing facilities.
	<p>The Department also notes the recent completion of the new St. Mary's NS at Millbrae; recent addition of new extensions at Sessiagh O'Neill NS and Robertson NS (and the zoning of lands to the north-east of the school to accommodate this).</p> <p>As well as the modern Finn Valley College, work is also ongoing for a major project at St. Columba's College, Drumboe Avenue.</p> <p>Welcomes policy re Opportunity Site 2 to allow consideration of educational use.</p>	
Donegal Town	Potential extra requirement could be met by expansion of existing facilities.	Are plans to expand existing school, and this should cater for any potential increase.
Killybegs	No anticipated requirement for additional capacity.	Potential extra requirement could be met by expansion of existing facilities, if required.
An Cloachan Liath	Potential extra requirement could be met by expansion of existing facilities.	No anticipated requirement for additional facilities.
Lifford	Potential extra requirement could be met by expansion of existing facilities.	No facility.

Carndonagh	No anticipated requirement for additional capacity.	No anticipated requirement for additional capacity.
Ballyshannon	No anticipated requirement for additional capacity.	No anticipated requirement for additional capacity.
Bundoran	May be a requirement for additional places.	Potential extra requirement could be met by expansion of existing facilities, if required.
Raphoe	No anticipated requirement for additional capacity.	Note that schools here can accommodate students from Lifford. Potential extra requirement could be met by expansion of existing facilities, if required.
Bunbeg/Derrybeg	No anticipated requirement for additional capacity.	No anticipated requirement for additional capacity.
Milford	No anticipated requirement for additional capacity.	No anticipated requirement for additional capacity.

Policy Issues

The Dept. notes and supports a number of objectives and policies. In addition, it makes specific requests in relation to the following:

- The inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools (as these will be critical in meeting school accommodation requirements);
- Support for urban design schools in established areas would be welcome. In particular, measures to facilitate reduced requirements for on-street parking and set-down and to support access to off-site public amenities and facilities is essential to achieving the delivery of schools in the carbon neutral model promoted in the NPF;
- Requests that the capacity of existing schools and any planned schools be considered as 'supporting infrastructure and facilities' and given high priority in DCC's assessment of the suitability of specific land for residential development.

Chief Executive's Response:

In terms of the general school capacity position, the strong alignment of the Core Strategy with the advised school capacity, and the assistance of the Department in achieving this alignment, is acknowledged.

With regard to the specific requests of the Dept:

Re the Bundoran Primary School land buffer, it is acknowledged that the school is zoned as 'Established Development' rather than 'Community Infrastructure'. This is an error and is addressed in the recommendation below.

Re the inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools, it is difficult to conceive of how this could be achieved on a 'blanket basis' as the circumstances of each site will be different and third party rights must also be protected. The Authority will of course work with the Dept. on specific cases as and when the need arises as was demonstrated with the referenced co-operation on the Buncrana three schools campus.

Re request for support for 'urban design schools' in established areas (in particular, measures to facilitate reduced requirements for on-street parking and set-down), Objective CC-O-1 and Policies CC-P-1 and CC-P-2 in the Draft Plan address these matters. Having reviewed these policies, and having regard to the expressed wish of the Department in the context of the climate change and active travel policy, it is agreed that the policy framework could and should be adjusted. This is recommended below.

Re the requests that the capacity of existing schools and any planned schools be considered as 'supporting infrastructure and facilities' and given high priority in DCC's assessment of the suitability of specific land for residential development. Having reviewed relevant policies, it is agreed that the policy framework could and should be adjusted. This is recommended below.

Chief Executive's Recommendation 12.1:

- 1) Amend the Bundoran Land Use Zoning Map to change the curtilage of St. McCartans's National School from 'Established Development' to 'Community Infrastructure'.

(This is considered to be non-material.)

- 2) Amend Policy CC-P-2 (new text in blue)

Require that social, community cultural development proposals generally comply with the policies and technical standards of this plan and the following specific development management criteria:

- a. Are compatible with adjacent existing or approved land uses.
- b. Do not have a significant impact on adjacent residential amenities.
- c. Provide adequate effluent treatment in compliance with the wastewater treatment policies of this plan.
- d. Do not cause a traffic hazard and ensure the existing road network can safely handle any extra vehicular traffic generated by the proposed development.
- e. Provide adequate parking provision, access arrangements, manoeuvring and servicing areas in line with technical standards and policies of this plan. **Specifically in relation to schools and similar education facilities, incorporate measures that de-prioritise set-down/drop-off arrangements.**
- f. Prioritises, and provides for a high level of, pedestrian and cycling permeability and access.g
- g. Do not create a noise nuisance and or cause significant environmental emissions.
- h. The location siting and design of the development is of a high quality, successfully integrates with the host environment including the landscape and/or built environment of the area and does not negatively impact on the visual and scenic amenities of the area.
- i. Provides appropriate boundary treatment and screening of storage areas from public view.
- j. Does not have a negative impact on the built or natural heritage of the area and complies with the built and natural policies of the plan.
- k. Complies with the floodrisk management guidelines and the associated flood risk policies of this plan.
- l. Have suitable soil depth and water table (in the case of burial grounds/graveyards).

(This is considered to be non-material.)

- 3a.) Amend Policy UB-P-1 (new text in blue)

It is a policy of the Council that the provision of multiple housing developments (defined as 2 or more units and excluding holiday homes) will generally be acceptable in principle within those towns/settlements identified in the Core Strategy/Settlement Structure, subject in all cases to the principles of quality placemaking, compact growth and the sequential development of settlements

from the centre out, the availability of [supporting infrastructure and facilities \(including school provision\)](#), sustainable wastewater treatment solutions and relevant zoning objectives. The scale of any such development shall be in line with the provisions of the Core Strategy, shall have regard to the circumstances of the specific settlement and shall be in accordance with all relevant objectives and policies of this Plan.

(This is considered to be non-material.)

3b.) Amend Policy UB-P-4 ([new text in blue](#))

To ensure that new residential development is carried out in serviced areas or those areas where the provision of required planned infrastructure (e.g. roads, footpaths, wastewater, water supply social and community infrastructure etc. [including school provision](#)) is imminent.

(This is considered to be non-material.)

Dept. of Transport DCDP-79

Key issue refers to National Disability access practices and strategies. In particular, advises as follows: (Chapter 6: Housing, Reference UB P7, page 65), Chapter 8: Infrastructure, Chapter 12: Community Development, section 12.7 'Aged and Disabled Friendly Communities, page 218)', should include material on UNCRPD, Universal Design, Whole Journey Approach, and to make specific reference to the 'Design Manual for Urban Roads and Streets interim note'.

Chief Executive's Response:

This advice is acknowledged. The Department's references include Section 12.7 'Aged and Disabled Friendly Communities in the Plan. Policy CC-P-8 therein addresses disability access issues on a general basis. It is considered that amendment of this policy should address the request of the Department.

Chief Executive's Recommendation 12 2:

Amend Policy CC-P-8 as follows ([new text in blue](#))

'Ensure that the siting and design of development proposals (including housing, retail, commercial, community, public realm/urban environment and public amenity spaces) comply with best practice in universal design including in particular the guidance set out in Building For Everyone A Universal Design Approach Booklet 9 Planning and Policy (National Disability Authority) including the associated parking standards set out in section 9.4.14 therein and otherwise provides for lifetime adaptability.' [The application of other best practice documents including United Nations Convention on the Rights of People With Disabilities, Universal Design, Whole Journey Approach, and the 'Design Manual for Urban Roads and Streets Interim Note will be applied as considered appropriate.](#)

(This is considered to be non-material.)

Section 13: An Ghaeltacht

Similar submissions were received from Pobal Eascarrach (submission ref DCDP-56) and Coiste Pleanála Teanga na Gaeltachta Láir (submission ref DCDP-57), Cllr Mac Giolla Easbuig (submission no. DCDP-282), Rannóg na Gaeilge (submission ref DCDP-285). The submissions are in the form of presentation slides that appear to have been prepared for the national policy level. That said, the documentation does contain content that requires consideration in this Report. This content is in the form of four requirements, and these are set out below:

1. 'That an independent language impact assessment would be needed in the case of every proposed house, except a house for person who is a native of that Gaeltacht electoral division, and every other type of proposed development in a Gaeltacht area.'
2. 'That the person seeking planning permission have an appropriate standard of Irish'
3. 'That there be restrictions on housing estates and on holiday homes.'
4. 'That social houses be provided for Gaeltacht communities.'

Chief Executive's Response:

Re Pt. 1, Draft Plan Policy GAE-P-2(a) sets out the proposals for the proportion of units to be occupied by Irish speakers in a permitted multiple development. Having regard to the identified need to protect and strengthen the language and heritage of An Gaeltacht it is proposed to amend this policy to require a minimum of 66% of new multiple housing developments to be occupied by Irish speakers and that a language clause will be applied for a duration of 15 years from the date of first occupancy of the unit.

Draft Plan Policy GAE-P-2(b.) currently requires language impact assessments for multiple residential developments within Gaeltacht areas of 10 or more dwellings in all cases, and in proposals of less than 10 units where there is potential for a significant impact on the Irish language in the area. This approach is consistent with the appropriate, and mandatory, requirements of Section 10(2)(m) of the Planning and Development Act and is considered reasonable. The rural housing policies of the Plan requiring demonstration of social or economic need for one-off houses will also provide an additional layer of support for the language.

Re Pt.2 Current arrangements in relation to the determination of the standard of Irish of applicants/occupiers of approved dwellings will remain in place and will be reviewed upon adoption of the County Plan to update practice and procedures This is considered to be a reasonable and appropriate approach.

Re Pt. 3, refer to the response to Pt. 1 above. Re holiday homes, other policies in the Draft Plan do not support one-off holiday homes in the rural area, including An Gaeltacht (refer Policies RH-P-1, RH-P-2 and RH-P-3). Multiple holiday homes within settlements are supported only where they would not exceed 20% of the existing and permitted housing stock. This is proposed as a reasonable and appropriate approach.

Re Pt.4, Donegal County Council are actively engaged in the provision of social housing across the County including the Gaeltacht areas where the policies of Chapter 13 of the Draft Plan are applicable.

Chief Executive's Recommendation 13.1:

Amend Policy GAE-P-2(a) to read: (existing text in black; new text in blue; ~~text to be deleted in strikethrough~~)

Impose a language condition on any planning permission for multiple residential development of 2 more dwellings in the Gaeltacht requiring that the proportion of units to be occupied by Irish speakers equates to the proportion of Irish speakers within the subject DED (based on the latest available census data) subject to a minimum of ~~20%~~ 66% rounded up to the nearest whole

number of units where necessary. A language condition shall be applied to all applicable units for a duration of 15 years from the date of the first occupancy of the unit.

(This is considered to be a material alteration.)

The Failte Ireland (submission ref DCDP-189) recommends amendments to Policy GAE-P-4 as below (proposed new text in red):

Support the principle of the following Irish language-related developments:

- a. educational, cultural and community developments including the provision of new, and the expansion of existing, Gaelsoileanna and Naíonraí, and youth and social infrastructure;*
- b. strategic tourism projects supported by Udaras Na Gaeltachta;*
- c. economic/enterprise development proposals including those in existing and new Údarás Na Gaeltachta business parks and sites, the completion of the strategic network, remote working infrastructure and projects associated with the Gaeltacht Glás programme;*
- d. the provision of enhanced transport, water and wastewater infrastructure; and*
- e. urban regeneration and placemaking projects in Gaeltacht towns, villages and Islands.*
- f. Promote and encourage the increased use of Irish in the accommodation, restaurant, retail, attractions and activity sectors.*
- g. Collaborate with Fáilte Ireland and Tourism Ireland to sustainably support and promote our Gaeltacht areas as key Irish Language Tourism destinations.*

Chief Executive's Response:

Bullet 'g' is agreed although it is considered that this is best expressed in the form of an 'Action' as opposed to policy. Regarding bullet 'f' however, it is considered that these matters are already addressed in bullet 'c'.

Chief Executive's Recommendation 13.2:

Insert additional text after Policy GAE-P-6:

'In addition to the above-noted policy framework, Donegal County Council is also committed to collaborating with Failte Ireland and Tourism Ireland to sustainably support and promote our Gaeltacht areas as key Irish Language Tourism destinations.'

(This is considered to be non-material.)

Section 14: Marine Resource, Coastal Management, and the Islands

Marine Coastal and the Islands

List of Submissions Received Related to Chapter 14 Marine Resource, Coastal Management and the Islands.

Ref	Submitter Name/Organisation	Summary of Topic Raised Related to This Chapter
DCDP-77	Causeway Coast and Glens Borough Council	Greencastle
DCDP-99	Burtonport Harbour Committee	Floating Breakwater
DCDP-138	Uisce Eireann	Wastewater Treatment Capacity in Coastal/Wild Atlantic Way Settlements
DCDP-145	Inishowen Development Partnership (IDP)	Greencastle BIM Facility
DCDP-185	Foyle Port	Foyle Port and Proposed Greencastle Cruise Berth Facility
DCDP-186	Irish Farmers Association	Aquaculture
DCDP-231	Roger Garland	General (See Categories)
DCDP-262	Northern and Western Regional Assembly	Killybegs and Greencastle Ports
DCDP-264	Department of Education	Education Facilities for the Islands

Submission Summary and Chief Executive Response/Recommendation

Causeway Coast and Glens Borough Council DCDP-77

Submission Summary

This submission states that it shares Lough Foyle and Magilligan to Greencastle ferry service with DCC, that Greencastle remains an important harbour and the Greencastle Breakwater projects will provide additional safety benefits for the fishing fleet. It also cites MRCM-P-3 in supporting the Greencastle's role in fishing, fleet activity and ancillary marine services. It notes that Foyle port has proposed additional cruise berth facilities at Greencastle and this project has the potential enhance it as a cruise destination. The submission also cites MRCM-P-7(c) and (d) in relation to supporting the Greencastle-Magilligan Ferry Service and the development of Greencastle as a Cruise Destination.

Chief Executive Response

The submission's implicit support for the Greencastle Breakwater Project and Policies MRCM-P-3 (Safeguarding and Enhancing the Role of Greencastle as a fishing, fleet activity and seafood processing centre) and MRCM-P-7 (Supporting the Greencastle and Magilligan Ferry Services and the development of Greencastle as a regional cruise designation) are acknowledged and welcomed.

Burtonport Harbour Committee DCDP-99

Submission Summary

This submission proposes a floating breakwater to help shelter the Burtonport Harbour from North, North West, and South West gales, argues that such a facility will double the size of the harbour, provide safe berthage and boost the local economy and requests its inclusion in the County Development Plan.

Chief Executive Response

The merits of a **Floating Breakwater at Burtonport Harbour** to provide improved shelter, expand the functional area and berthage facilities of the harbour and boost the local economy is acknowledged. It is considered that the provision of such a facility in Burtonport is implicitly supported by Policy MRCM-P-3 of the existing Draft CDP which supports *the provision of additional harbour infrastructure* at inter alia Burtonport.

Chief Executive's Recommendation 14.1:

No Change Recommended.

Uisce Éireann DCDP-138**Submission Summary**

This submission suggests amendments to *Figure 14.1 Spare Wastewater Treatment Capacity in and Water Capacity in Coastal/Wild Atlantic Way Settlements* to reflect projects which are underway to address capacity constraints, highlight settlements where there is no existing UÉ WW infrastructure, provide an explanatory note re the Culdaff WWTP and that said table is subject to change.

Chief Executive Response



On foot of the **Uisce Éireann DCDP-138** comments regarding *Figure 14.1 Spare Wastewater Treatment Capacity in and Water Capacity in Coastal/Wild Atlantic Way Settlements* and further consultations with said organisation it considered that the following amendments be made to said table as set out in the recommendation below.

Chief Executive Recommendation 14.2

Amend Figure 15.1 as set out below.

Figure 15.1: Spare Wastewater Treatment Capacity and Water Capacity in Coastal/Wild Atlantic Way Settlements

	Spare Wastewater Treatment Capacity, & WWTP Upgrade Progress	Water Capacity
Donegal MD		
Cill Chartaigh (Kilcar)		
An Charraig (Carrick)		
Glenties MD		
An Fál Carrach (Falcarragh)	Stage 3	
Cresslough		
Ardara		
Dunfanaghy	Stage 2	
Glenties		WTP Upgrade in short-term
Portnablagh	Stage 2	N/A
Letterkenny MD		
Na Dúnaibh		
Portsalon	No UÉ WW Assets	N/A
Rathmullan	Stage 4	
Inishowen MD		
Ballyliffin	Stage 2	
Greencastle	No UÉ WW Assets	
Malin		
Moville	Stage 3	
Clonmany		

Culdaff	*See Note below	Works ongoing to improve LoS
Legend		
Wastewater Capacity		Spare capacity Potential Capacity available to Urban Wastewater Standard only
Water Capacity		No spare capacity Capacity available Potential Capacity available
Note:		
<ul style="list-style-type: none"> • The above table provides an indication of available capacity and is based on a national standardized review of available information in June 2023 and is subject to change. • The UÉ Culdaff WWTP currently only serves the village core and has limited spare capacity. Private WWTPs outside the village core and are not accounted for in the UÉ capacity register and UÉ WWTP would be required to be upgraded if these private WWTPs were to connect to same. 		
(This is considered to be non material.)		

Inishowen Development Partnership submission DCDP-145
Submission Summary
This submission highlights the need to include Greencastle BIM training facility within the Marine Cluster Proposal.
Chief Executive Response
For clarity, the Marine Cluster relates to a cluster of Blue Economy enterprises at Killybegs which has been highlighted in the plan rather than a specific development proposal. However Section 14.5 of the plan specifically cites the importance of the Greencastle as a fishing harbour including the presence of the BIM National Fishery College.

Foyle Port Submission DCDP-185
Submission Summary
This submission notes that Foyle Port’s jurisdiction extends across the entirety of Lough Foyle including Greencastle. Foyle Port is the largest bulk cargo port serving the NW, and has significant tourism and leisure assets. States that the Port’s strategic objectives include maintaining/improving strategic infrastructure links and expanding cruise berth capacity and opines that the Draft CDP must ensure a co-ordinated policy approach across the NW Region.
The submission notes that the national and regional planning context is clearly supportive of further development of port facilities at Greencastle and Foyle Port can play a central role in the development of a marine resource innovation park at Greencastle.
It welcomes the recognition of Greencastle as an important harbour which contributes to the marine industry in Section 14.5.
It welcomes the clear support for additional cruise ship berthing facilities in Greencastle in Section 14.10 and states that there has been direct engagement with DCC regarding a feasibility study re cruise ship berthing facilities at Greencastle and a joint approach is being undertaken where Foyle Port will work closely with DCC on the feasibility study, which will commence in the near future.

Accordingly, it suggests the following amendment to Section 14.10 (existing text in black; new text in blue; text to be deleted in strikethrough-)

"In addition, the Council will support the provision of cruise ship berthing facilities at Greencastle, subject to an appropriate feasibility studies, study prepared in conjunction with Donegal County Council. the Council will support the provision of cruise ship berthing facilities at Greencastle.

It welcomes the recognition in Section 14.11 that Greencastle is a significant marine leisure and tourism asset and the socio-economic and tourism importance of the Greencastle-Magilligan Car ferry service.

It appreciates the clear and unambiguous support for the continued growth of Foyle port facilities, the provision of improved infrastructural links to the port and the provision of enhanced cruise ship berthing facilities at Greencastle in Section 14.12 . However it states that given a joint approach will be taken on a feasibility study it suggests the following amendment:

"In this context the Council supports the continued growth of the Foyle Port's facilities, the provision of improved infrastructural links to the port, and, subject to appropriate feasibility study, the provision of enhanced cruise ship berthing facilities at Greencastle." subject to an appropriate feasibility study prepared in conjunction with Donegal County Council."

It supports and welcomes the inclusion of Policy MRCM-P-3 in relation safeguarding and enhancing the role of Killybegs, Greencastle and Burtonport as centres of fishing, fleet activity and seafood processing. It also supports the inclusion of MRCM-P-7 providing for the development of Greencastle as a regional cruise ship destination.

Chief Executive Response

Foyle Port's support for the plan's recognition of Greencastle Port's importance as fisheries harbour, marine industries centre and local economic catalyst (Section 14.5) and the provision of cruise ship berthing facilities subject to appropriate feasibility studies (Section 14.10) is acknowledged and welcomed.

In relation to the proposed amendments to Section 14.10 and 14.12 it is considered that the existing wording which supports the provision of cruise ship berthing facilities at Greencastle subject to appropriate feasibility studies is sufficient and it is not necessary to identify who will carry out said studies.

However, it is agreed that Section 14.12 is amended to widen the scope of the Council's support for the development of Greencastle Harbour (See Recommendation Below).

Chief Executive's Recommendation 14.3:

Amend Section 14.12 as follows (new text in blue)

In this context the Council supports the continued growth of the Foyle Port's facilities, the provision of improved infrastructural links to the port, and, subject to appropriate feasibility study, the provision of enhanced cruise ship berthing facilities at Greencastle- and the continued development at Greencastle Harbour to meet the future needs of the marine industry.

(This is considered to be non material.)

Irish Farmers Association Aquaculture submission DCDP-186

Submission Summary

The submission notes that IFA Aquaculture represent stakeholders from farm fish, shellfish, seaweeds and other novel species which may be cultured around the coastline of Ireland.

In relation to Chapter 14 Marine specific issues notes that Section 14.6 recognizes the importance of the Aquaculture Industry and cites the facilitation of onshore Aquaculture related developments in MRCM-P-5.

Opines that whilst Offshore Renewable Energy is important in achieving Ireland’s energy and climate targets and ORE could help to deliver positive, local social and environmental benefits. However, it states that stakeholder engagement will be vital, ORE development should be plan led rather than being developer/project led, and the aquaculture industry must be represented in stakeholder engagement groups related to DMAPs.

Chief Executive Response

The IFA’s recognition of the plan’s support for Aquaculture in Section 14.6 and the facilitation of onshore aquaculture facilities in MRCM-P-5 is acknowledged and welcomed.

The Planning Authority agrees that stakeholder engagement in Offshore Renewable Energy (ORE) will be vital and that ORE development should be plan led. In this regard the functional remit of the CDP 2024-2030 currently only extends to onshore development. In future it is likely that Designated Maritime Area Plans will be prepared to regulate development in the nearshore and offshore areas under the Maritime Area Planning Act 2021 and Section 23 of said Act sets out Public Participation procedures in relation to same.

DCDP-231 Keep Ireland Open

Submission Summary

This lengthy and complex submission makes a multitude of policy proposals regarding marine and coastal issues including inter alia: deleting references to the Wild Atlantic Way and Cruise ship Tourism, promoting coastal access, implementing the National Marine Planning Framework, Coastal Zone Management, coastal erosion/protection, coastal walks, beaches, marine recreation, protecting visual amenities, and the protection of marine coastal/ecology and dunes etc.

Chief Executive Response

It is considered that the Draft Plan provides a robust, concise, and workable framework for the sustainable development of Donegal’s marine resource and coastal areas. For example:

- MRCM-P-1: Requires developments to be consistent with the National Marine Planning Framework.
- MRCM-P-2: Supports and facilitates new amenity and recreational infrastructure in our coastal settlements.
- MRCM-P-8: Facilitates improved coastal/beach infrastructure and supports the implementation of the existing beach and maritime craft byelaws.
- MRCM-P-9: Facilitates coastal erosion works where strategically justified.
- MRCM-P10: Requires that new marine and coastal developments do not have a significant adverse impact on the visual and scenic amenities of the coastline, sensitive coastal environments, and geomorphological processes.
- L-P-3: Safeguards the scenic context of the Donegal’s coastline from inappropriate development.

NWRA Submission DCDP-262

Submission Summary

Page 7 and Observation (X) of this submission states the plan should more clearly articulate how it is delivering upon RPOs 4.3.1 - 4.3.5 of the RSES, with reference to Killybegs and Greencastle, which are noted as being of Regional Significance in the RSES. It states that the plan should reflect on RSES’s support for examining the feasibility of designating Killybegs Port as an EU TEN-T

Comprehensive Port. It further states these issues should be articulated/cross reference in a consistent manner with Chapter 14.

Page 11 notes that Chapter 14 sets out the significance of Killybegs and Greencastle with a number of policies reflecting the ambition to take advantage of Floating Offshore Wind and these are consistent with RPOs 4.31 and 4.34.

Observation (xxi) requests that Chapter 14 be reviewed to consider incorporating any applicable findings related to the NWRAs publication on Designated Marine Area Plans (DMAPs).

Chief Executive Response

In summary:

- **RPO 4.31** of the RSES aims to protect, upgrade and expand our key Fisheries Ports of Killybegs, Greencastle and ensure adequate continued investment in facilities.
- **RPO 4.32** aims to expand our regional assets in the Blue Economy including in Marine research and innovation, gas and oil deposits, and seafood innovation.
- **RPO 4.33** aims to facilitate Marine Renewable Projects off the West and North West Coast of Ireland.
- **RPO 4.34** seeks to enable development of Marine Resource Innovation Parks including at Greencastle and Killybegs.
- **RPO 4.35** supports the ongoing upgrade and repair of the regions harbours and ports and ensure the sustainable development of this infrastructure to enable aquaculture and seafood industry expansion.

The Draft CDP already recognises, supports, and facilitates the delivery of these RPO's in the following manner:

- Section 14.5 Fishing, Seafood and the Blue Economy of plan recognises Killybegs as a port of Regional Significance, a nationally important blue economy hub, notes recent funding to provide a 120m quay extension, and that increasing fishing vessel length may necessitate additional harbour expansion. In addition, Section 14.7 Offshore Renewable Energy of the plan already notes that Killybegs is ideally placed to provide for and benefit from the ORE sector, supports the ancillary use of the use of the existing fisheries harbour centre facilities for the ORE sector, the provision of additional harbour infrastructure to accommodate ORE requirements and the designation of Killybegs Port as Part of the TEN-T comprehensive network.
- Section 14.5 of the plan already notes that Greencastle remains an important fisheries harbour and states that the completion of the Breakwater Project will provide additional shelter and associated safety benefits for the fishing fleet. In addition, it is also recommended that Section 14.12 is amended to widen the scope of the Council's support for the development of Greencastle Harbour (see Recommendation 14.2 above).
- MRCM-P-3 provides for the safeguarding, enhancement of the roles of Killybegs, Greencastle and Burtonport as centres of fishing, fleet activity, seafood processing, and/or ancillary marine services and education including including *where necessary the provision of additional harbour infrastructure*.
- MRCM-P-4 supports the development of Killybegs as a centre for Offshore Renewable Energy and as marine logistics hub for onshore wind energy including... storage infrastructure, its designation as a Comprehensive TEN-T network port.
- MRCM-P-5 facilitates onshore aquaculture related developments including services, marine access, storage and processing related developments.

In addition, the Seven Strategic Towns Local Area Plan 2018-2024 land use zoning map for Killybegs zones a significant area for Port/Harbour related activities and for Economic Development which effectively underpins said policies. This LAP will be reviewed during the lifetime of the plan.

However, in order further support the delivery of said RPO's it is considered that the plan be amended in accordance with Recommendation 14.3 below.

The recommendations contained in the NWRAs publication on Designated Marine Area Plans (DMAPs) relate to practical steps to progress Marine Spatial Planning in the Northern and Western Region including: establishing an MSP advisory group, forming marine/coastal partnerships, incorporating strategic vision on land sea interactions in the next RSES, analyzing/mapping of existing uses in the nearshore and ecologically sensitive marine areas, reviewing existing areas, preparing an issues paper, and formulating a draft DMAP. As such it is considered that said publication is relevant to the preparation of future DMAP rather than any containing planning policy/zoning issues which should be contained within this Development Plan. In this regard future DMAPs will provide the relevant detailed spatial/planning policy framework for the nearshore and offshore areas.

Chief Executive’s Recommendation 14.4:

Amend Section 14.7 of the Plan as follows (text to be deleted in strikethrough, new text in blue.)

~~The importance of seeking TEN-T Comprehensive Network Status for Killybegs is specifically highlighted in the NWRA RSES (p.216 refers) and Chapter 8.1: ‘Transport’ in this Plan.~~

The significance of Killybegs port in providing international connectivity is highlighted in Chapter 8.1: ‘Transport’. In addition, the feasibility of seeking TEN-T Comprehensive Network Status for Killybegs is specifically highlighted in the NWRA RSES (p.216 refers). In this regard the Council will pursue the upgrading of the N56 National route to the port (as outlined in Table 8.1A of this plan), facilitate the provision of additional harbour facilities at the port (as provided for by MRCM-P-3 and 4), constructively engage with all relevant stakeholders, and support the carrying out of any relevant feasibility studies.

Amend MRCM-P-3 of the plan as follows (existing text in black; new text in blue.)

To safeguard and enhance the roles of Killybegs, Greencastle, and Burtonport, as centres of fishing, fleet activity, seafood processing and/or ancillary marine services and education including, where necessary the provision of additional harbour infrastructure, and facilitate the diversification of such locations into new areas of appropriate investment and employment opportunities, including marine related economic activity: **including supporting the development of Marine Resource Innovation Park(s).**

(This is considered to be non material.)

Department of Education DCDP-264

Submission Summary

This submission broadly supports Policy MRCM-P-6 in relation to inter alia supporting and maintaining education facilities for Donegal’s Islands

Chief Executive Response

Said support for Policy MRCM-P-6 in relation to supporting and maintaining inter alia education facilities for Donegal’s Islands is acknowledged and welcomed.

Section 15: Public Rights of Way

OPR DCDP-211	
List of Submissions Received Related to Chapter 15 Public Rights of Way	
DCDP-11	Nicolas North
DCDP-13	Anne Bowden
DCDP-17	David and Susan Crowe
DCDP-18	Hugh Frazer
DCDP-19	Sheila Sharpe
DCDP-20	John Northridge
DCDP-22	Richard McClelland
DCDP-23	Seamus Boyle
DCDP-26	Lisa McGeough Campbell
DCDP-28	Deiree Mules
DCDP-29	Dr W.D. Moore
DCDP-30	Barry Lynch
DCDP-33	Peter Watson
DCDP-34	Tony Kitterick
DCDP-35	Evelyn Kitterick
DCDP-36	Marie Molloy
DCDP-37	Mary Anna Wright
DCDP-38	Michael Kearney
DCDP-39	Anne Bowden
DCDP-40	Anne Bowden
DCDP-41	Therese Ellard
DCDP-42	Grainne Wilson
DCDP-48	Una Brown
DCDP-51	Mary Carr
DCDP-52	Luke Cape
DCDP-55	Dr Brian Good
DCDP-58	Margaret O Neill
DCDP-66	Randal Hayes
DCDP-75	Dr Fiona Harding
DCDP-78	Fiona Hurley
DCDP-80	Alan Watson
DCDP-81	Donna Watson
DCDP-160	Michele Clements
DCDP-164	Mairi Maguire
DCDP-166	Tommy Boyle
DCDP-167	Anne Hillard Murphy
DCDP-168	Ann Ryan
DCDP-169	Aaron Bennett
DCDP-171	Manus Brennan
DCDP-175	Joe Ryder

DCDP-177	Edel Moore
DCDP-180	Sharron Maria O Donnell
DCDP-181	Kevin Doherty
DCDP-182	Kate Morgan
DCDP-188	Anne Blanchard
DCDP-192	Diane Mc Corkell
DCDP-197	Alice Ring
DCDP-199	Juliana Brown
DCDP-202	Shamus Kelly
DCDP-207	Mary O Donnell
DCDP-211	Office of the Planning Regulator (OPR)
DCDP-213	Grace O Donnell
DCDP-216	Zoe McCloskey
DCDP-217	Janice Steele
DCDP-219	Tom O Donnell
DCDP-231	Roger Garland
DCDP-232	Fiona McKeown
DCDP-234	Anne Marie Woods
DCDP-242	Deva Evans
DCDP-247	Beth Evans
DCDP-250	Professor Alun and Mrs Kate Evans
DCDP-256	Declan Brennan
DCDP-263	Brian Carr
DCDP-266	Juliana Brown
DCDP-267	Sinead Moore
DCDP-268	Martin Moore
DCDP-269	Mary Moore
DCDP-270	Ken Moore
DCDP-271	Very Rev Fr. John Moore PP

It was noted in the Draft Plan that the Authority was reviewing data with a view to presenting detailed information as a Material Alteration. The OPR reminds the Authority of its obligations in this regard under Section 10(2)(o) of the Act.

Some 70 submissions from the public referenced the Castlegoland case specifically and urged the Authority to include this route as a Public Right of Way. It should also be noted that submissions from owners of land over which this route traverses also contradicted the understanding of the claims of the members of the public.

Chief Executive's Response:

With regards to the Authority's above-noted obligations, the first step in the process is to serve notice on owners and occupiers in accordance with Section 14(1) and (2). Such notices were served between October 6th 2023 and November 17th 2023 on the owners affected by 36 routes, which routes were extracted from the list contained in the current CDP 2018-2024, reviewed with Area Engineers and finalised on foot of this review. It is acknowledged that there may be other routes not addressed in this process but the prioritisation of the coastal routes was considered to be a justifiable priority at this time.

A total of 28 written submissions/observations were received from landowners within this 6-week period. A number of recurring issues were raised in these submissions:

1. Not a Public Right of Way: 9 no. submission all raised concern that routes identified in the notice(s) were not a public right of way but infact private roads that may be habitually used by the public. Some of these submissions went into detail as to the nature of the route, how it is used by the public and what the owner has carried out in terms of maintenance. One of these submissions stated that the access was a permissive ROW closed during winter months to prevent flooding of the public road and open during the summer months.
2. Insurance/ Public Liability: 4.no submissions raised the matter of the need for public liability insurance and questioned who would be responsible for carrying such insurance. 3 of these submissions also stated that there would be the matter of maintenance and upkeep of the ROW to such a standard to ensure safety for use by the public.
3. PROW for pedestrian access only: 3 no. submissions noted that, whilst they had no objection to being notified about the public right of way, they wanted to make the observation that the ROW was for pedestrian access and use only and not for vehicular access whatsoever.
4. Inaccurate mapping: 2 no. submissions observed that the maps attached to the notice(s) were inaccurate and not in accordance with their records.
5. Miscellaneous: Any other submissions not falling within any of the headings above relate to observations raising other matters such as; all affected parties not notified, the need for regulated parking, toilets, height restricted barriers, environmental concerns, beach degradation and litter.

The issues raised in the above-noted owners'/occupiers' submissions are noted. Notwithstanding, having regard to the Authority's statutory obligations as set out above, the recommendation set out below is to continue with the process and thereby allow a full public consultation on all of the identified routes.

Chief Executive's Recommendation 15.1:

To publish all 36 identified routes as Proposed Material Alterations.

(These are considered to be material alterations.)

Keep Ireland Open DCDP-231

This lengthy submission makes a multitude of policy proposals regarding public rights of way and these are noted.

Chief Executive's Response:

It is submitted that the draft policy proposals relating to this sector, in conjunction with the range of other objectives and policies elsewhere in the draft Plan seek to sustainably make provision for public rights of way in the county. A review of the public rights of way is to be the subject of further public consultation in the process of the making of the development plan

Chief Executive's Recommendation 15.2:

No change recommended at this stage in the process.

INISHOWEN MUNICIPAL DISTRICT

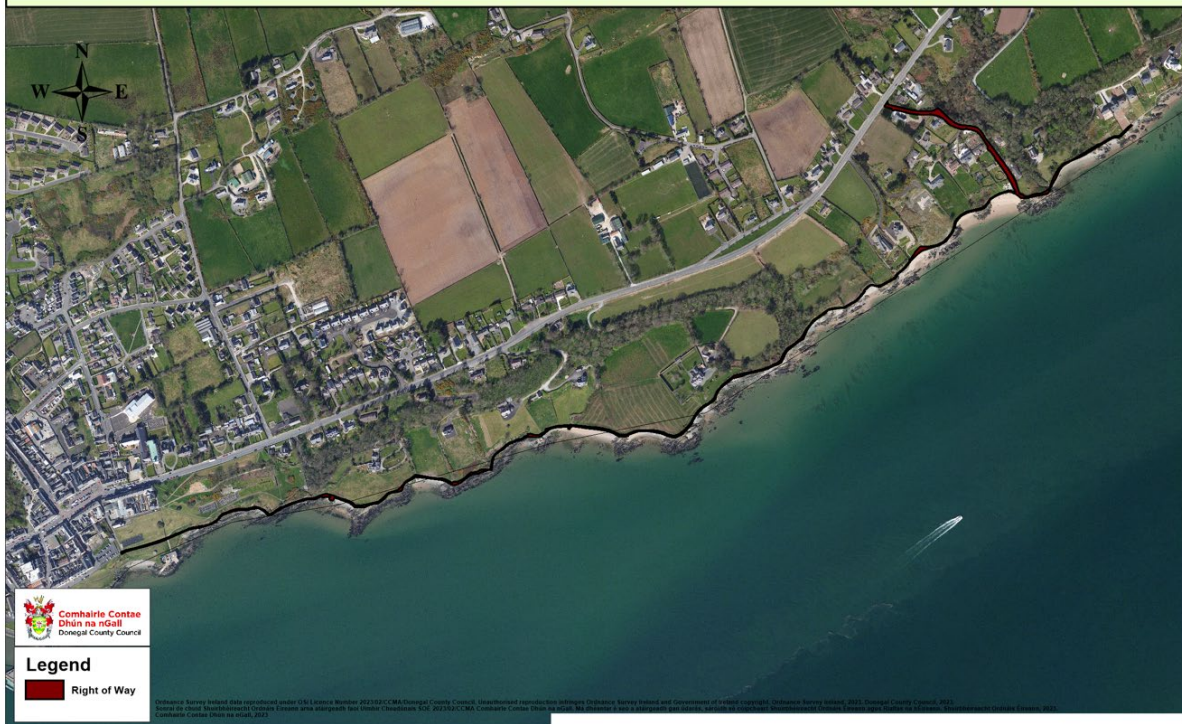
1. Ballynarry Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 1 - Ballynarry Beach



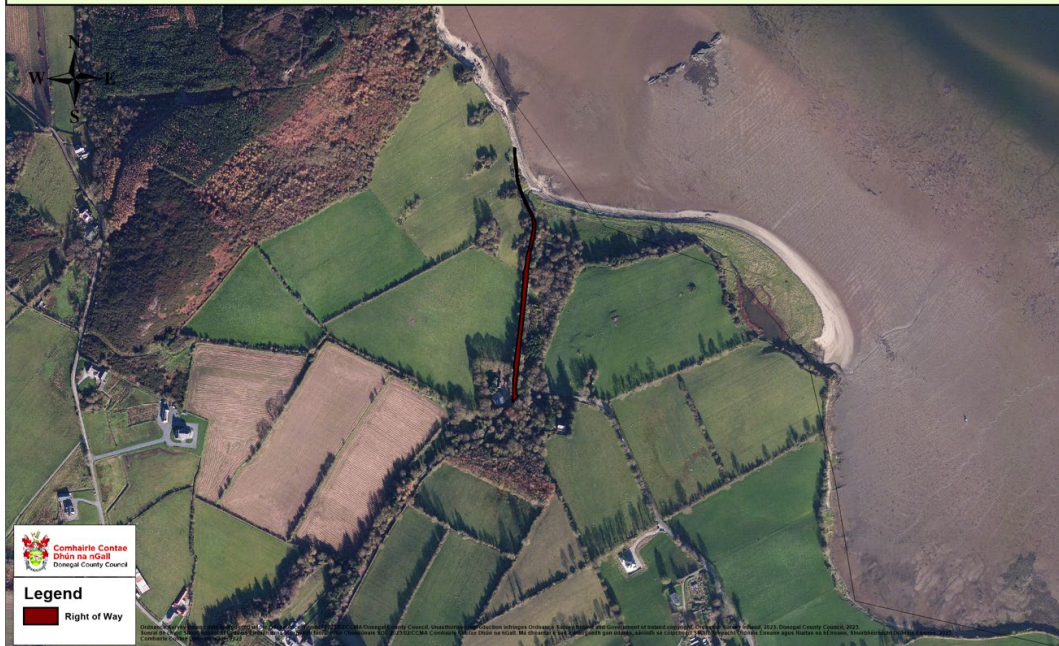
4. Glenburnie Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 4 - Glenburnie Beach



5. Leckon Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 5 - Leckon Beach



6. Leenan Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 6 - Leenan Beach



7. Sweet Nellies Bay

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 7 - Sweet Nellies Bay



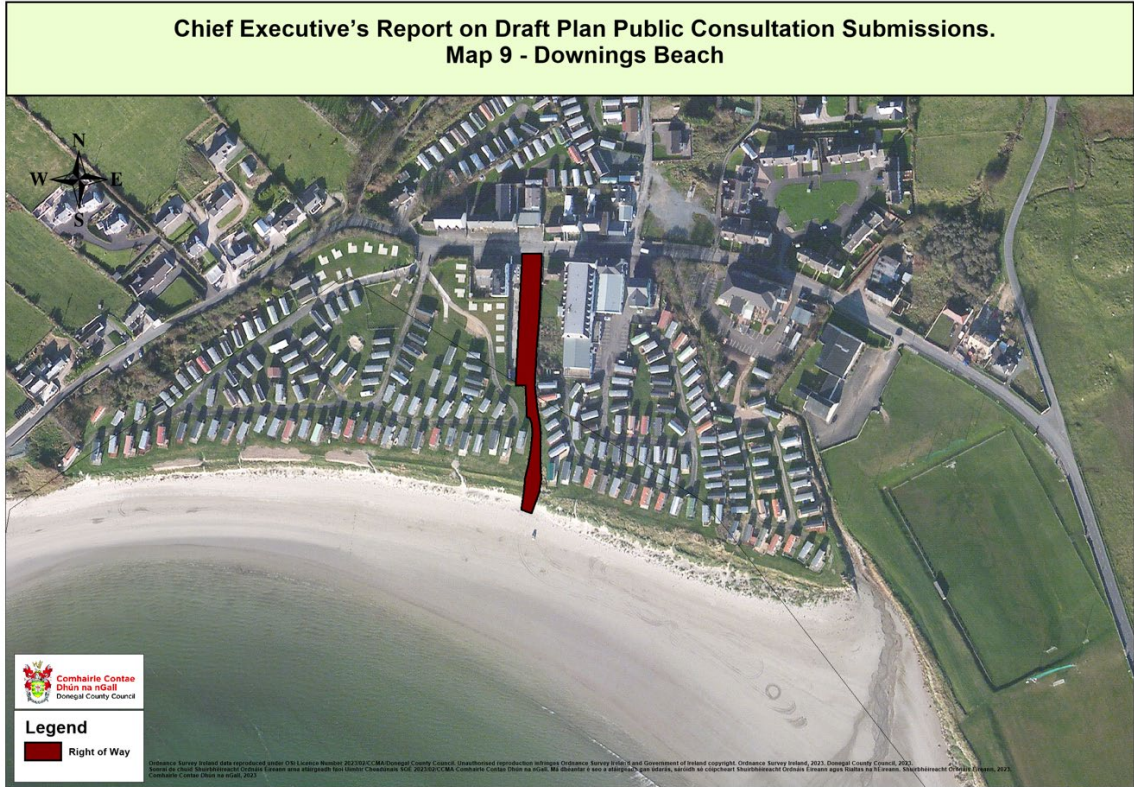
8. Tullagh Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 8 - Tullagh Beach



LETTERKENNY MUNICIPAL DISTRICT

9.Downings Beach



10. Centre of Ballyhiernan Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 10 - Centre of Ballyhiernan Beach



11. East of Ballyhiernan Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 11- East of Ballyhiernan Beach



12. West Side of Ballyhiernan Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 12 - West Side of Ballyhiernan Beach



13. North End of Kinnegar Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 13 - North End of Kinnegar Beach

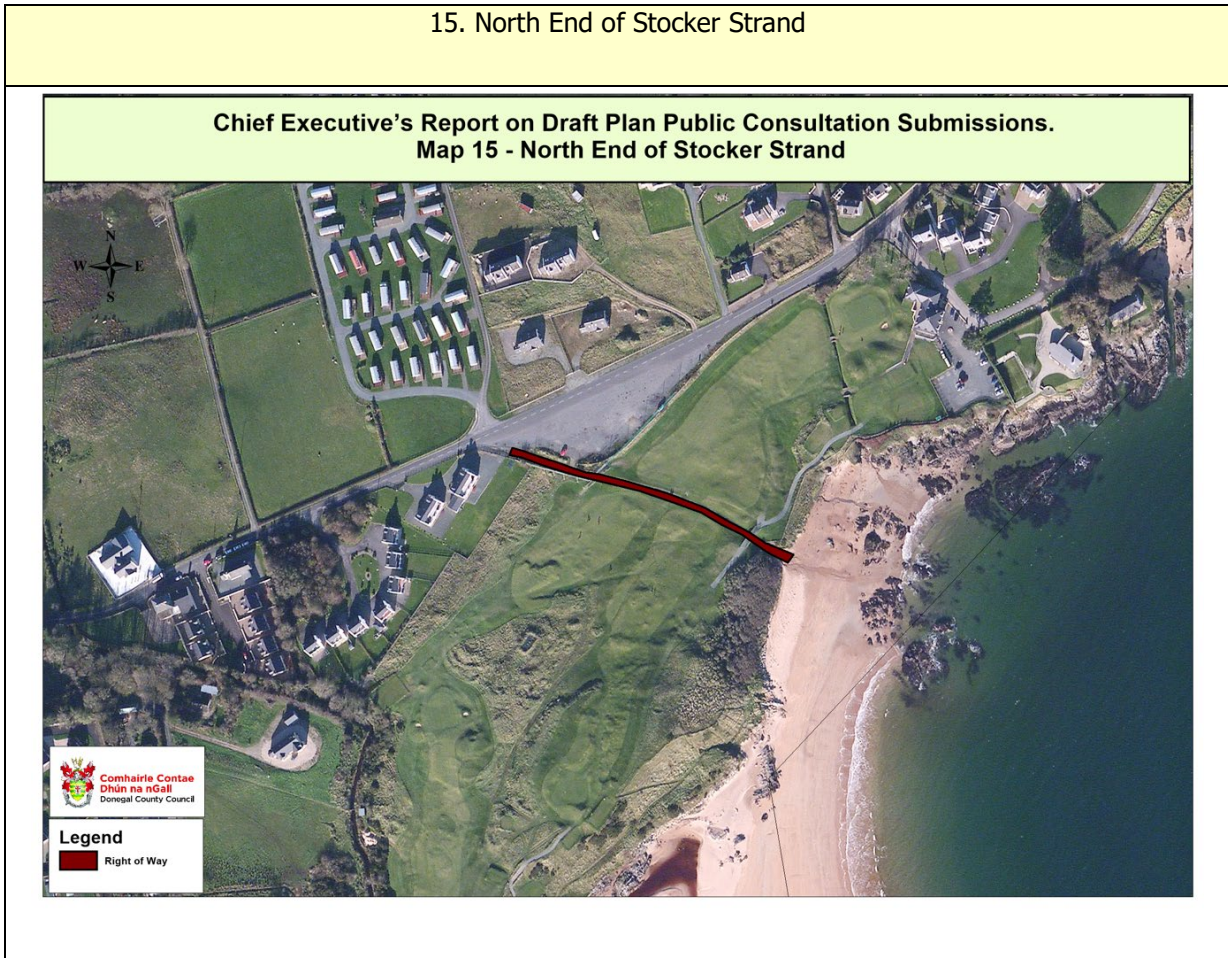


14. South End of Kinnegar Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 14 - South End of Kinnegar Beach



15. North End of Stocker Strand



16. South End of Stocker Strand

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 16 - South End of Stocker Strand



17. Trafaghboy Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 17 - Trafaghboy Beach



18. Tramore Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 18 - Tramore Beach



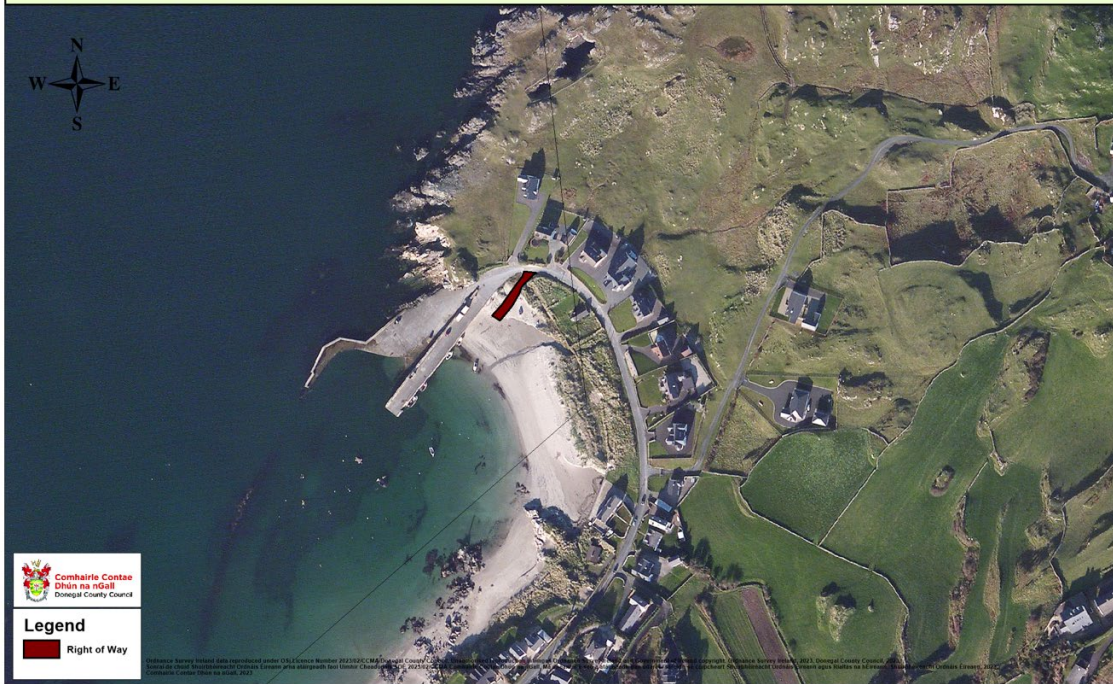
GLENTIES MUNICIPAL DISTRICT

19. Arlands Beach



20. Breaghy Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 20 - Breaghy Beach



21. Castlegoland

Map shows ref 20- needs to be changed to 21

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 20 - Castlegoland Beach



22. Dooley Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 22 - Dooley Beach



23. Dooley Magheraroarty

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 23 - Dooley Magheraroarty



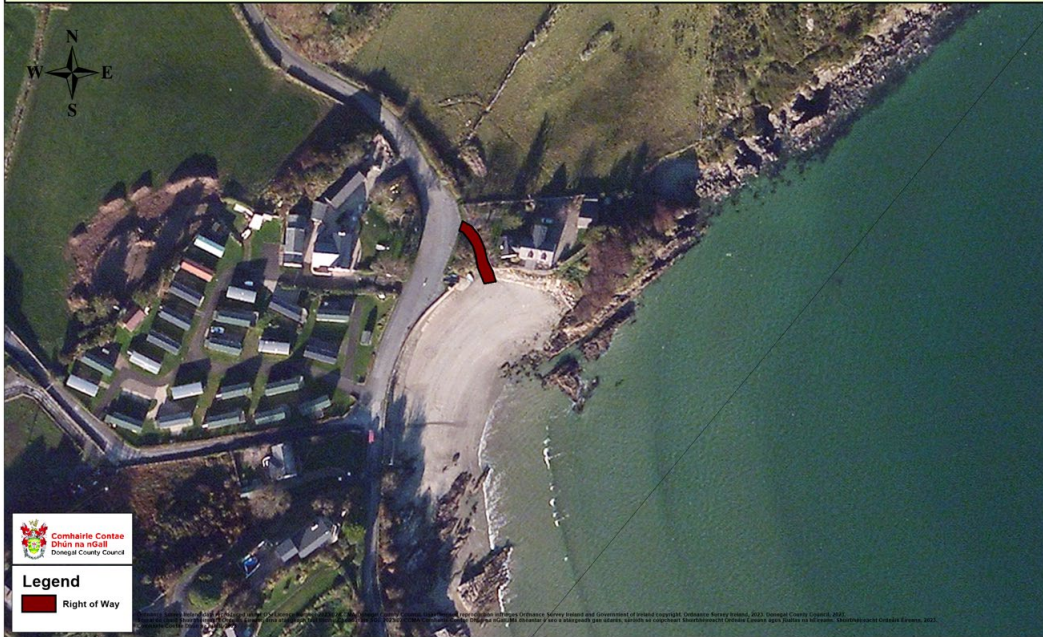
24. Dunfanaghy Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 24 - Dunfanaghy Beach



25. Marble Hill Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 25 - Marble Hill Beach



26. Maghera Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 26 - Maghera Beach



27. Magheraclogher Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 27 - Magheraclogher Beach



28. Mullaghderg Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 28 - Mullaghderg Beach



29. South of Braade West Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 29 - South of Braade West Beach



30. Tradearg Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 30 - Tradearg Beach



31. West Pier Bunbeg

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 31 - West Pier Bunbeg



DONEGAL MUNICIPAL DISTRICT

32. Fintragh Beach



33. Malinbeg Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 33 - Malinbeg Beach



34. South End of Rosstownlough Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 34 - South End of Rosstownlough Beach



35. South End of Glencolmkillie Beach

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 35 - South End of Glencolmkillie Beach



36. Tullan Strand

Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 36 - Tullan Strand Beach



Section 16: Technical Standards

An Post DCDP-24

Operates a number of post offices and delivery service units across the County and throughout the State. Due to the age of some of these facilities as well as the requirement to efficiently modernise postal facilities as a result of recent trends in the postal services market, the Company, over the coming years, will seek to enhance facilities at existing and new locations. In light of the Core Strategy growth ambitions, submission is made to set out An Post's current and future requirements to adequately serve expanding catchment areas and to request a supportive policy framework for the future provision of postal infrastructure.

Flexible Zoning Objectives: Request inclusion of provisions for An Post postal facilities (An Post Customer and An Post e-Commerce) as 'Permissible in Principle' or 'Open for Consideration' land uses across all zoning objectives in the CDP and Town Plans. In this regard, the inclusion of policy objectives and appropriate zoning designations for existing logistics/enterprise/commercial sites within Town Centres will ensure that a holistic approach to planning and development for the County Settlements is achieved.

Specific Land Use Classification: Also request inclusion of a specific land use classification for postal facilities:

- *Postal Facilities: A building which facilitates mail services that can include the processing, sortation and distribution of mail.*

Supportive Policies: Request inclusion of appropriate policies to support An Post's ambition to enhance postal facilities in the County:

- *"To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County."*
- *"To facilitate the provision of postal infrastructure at suitable locations in the County."*
- *"To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement."*

Deliveries & Access: Regarding accessibility, it is important that the specific requirements regarding access and deliveries to postal facilities, including post boxes and collection points, which are located in town centre areas are recognised. Access is typically required to premises on a 24-hour basis, although early morning deliveries and late evening collections are of particular importance to ensure mail can be delivered onward to catchment areas in a timely manner. In this regard, it is imperative that, in order to protect the smooth operation of the existing postal service in the County, any restrictions on the times of deliveries/collections to/from An Post facilities as well as customer access are protected at all collection points including retail offices, Delivery Service Units and post boxes as this could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State.

Also request that DCC would engage with An Post should any future area plan propose to amend delivery hours in town centre locations. Further to the above, it is important that a sufficient level of vehicular access is maintained, and that sufficient loading bay space is provided to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility. Request that during the preparation of any future public realm and movement strategies, DCC consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.

Car Parking: An Post requires use of c. 3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country. Due to the increasing number of

larger parcels being processed, it is considered likely that this requirement will increase over time and as such, An Post facilities may require greater levels of parking spaces, including electric vehicle charging points, as a steady transition is made to the use of environmentally sustainable vehicles. It is important to note, however, that car parking spaces are not only required for An Post delivery vehicles but also for vehicles used by staff that typically travel to An Post facilities by private car and customers collecting mail items.

Older facilities have been adapting to the increased volumes of mails and parcels and changing operational requirements. In this regard, older facilities face challenges regarding additional space and car parking requirements. In addition, as shifts typically start early in the morning, at times when public transport is not in operation, staff generally travel by private car. As such, these facilities generally require areas of car parking for staff, as well parking storage areas for the delivery vehicles used to transport mail. Moreover, as An Post transition to the use of environmentally sustainable vehicles, appropriate parking facilities are required to support same, with one EV parking station required per vehicle. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service. In this regard, any relevant parking standards in the new CDP should only apply to visitor and staff parking associated with An Post postal facilities, while the storage of all other vehicles used for the operation of the Irish postal service should not be included within parking standards. It is, therefore, requested that DCC provide flexibility with car parking standards. Also important to note that postal facilities may require a greater quantum of car parking areas going forward as postal trends continue to evolve, making it imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.

Chief Executive's Response:

Flexible Zoning Objectives: Having regard to the range and diversity of zoning objectives normally contained in town plans, including for example 'Open Space and Recreation', 'High Amenity', 'Tourism' and 'Rural/Agricultural', it is considered that the requested broad approach would not be appropriate. However, the nature of the referenced use is supported in principle in various appropriate zonings including 'Town Centre', 'Regeneration', 'Opportunity Sites (unless specific otherwise)', and 'Business/Enterprise'.

Specific Land Use Classification: Given the different types of postal facilities, as referenced by An Post, it is not considered appropriate to provide one such classification. The sector, in all its different functions, is covered by several general classifications including, in particular: 'Industry (light)'; 'Offices'; and 'Warehouse/Store/Depot'.

Supportive Policies: It is considered that the suite of policies contained in Chapter 7: 'Economic Development' generally strikes an appropriate balance between the national compact and sequential growth objectives on the one hand, and the economic development ambitions of the County on the other hand. The very specific policy requests of An Post are not considered appropriate in this context.

Deliveries & Access: The specific requirements regarding access and deliveries to postal facilities, including post boxes and collection points located in town centre areas are noted, as is the request that during the preparation of any future public realm and movement strategies, DCC consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.

Car Parking: The potentially varied requirements of An Post for parking facilities at its depots/offices etc. are noted. The policies of the Plan, together with national standards, are considered to be sufficiently flexible to enable effective consideration of such proposals.

Chief Executive's Recommendation 16.1:

No amendments recommended.

Mark Carlin: DCDP-67

3) Table 16.3, page.256 of the Draft CDP related to vision lines. An example within this table shows a requirement for 160m vision line on road with speed limits at 85Kph !

- I'm unsure as to why 85Kph when I've never seen a speed limit sign with same written on it !
- 160m is almost 525 feet - there appears to be not to many Public / Main Road junctions providing this sort of distance for vision lines, however the authority deem it necessary that single access (and indeed established access lanes) provide c.160m vision lines.
- Are 160m vision line a requirement Nationwide, or does this just apply to Co. Donegal ? Please give other County names if required there also?
- I refer to the attached RSA Document, and refer to page 121 therein, where it states that during 'wet-road' conditions Stopping Distance is 81m where the speed limit is at 80kph. Again, why is it a requirement in Co. Donegal to provide for c.160m when the RSA recommend 81m ?
- While I understand that the recommendation from the RSA is given on the bases that the car in front would be slowing down, would not be the same as a car leaving an access point, but the car leaving the access point would be speeding up ! Can you please advise as to why the extent of vision line requirements within Table 16.3, and as to whom / where did the advice come from to apply such measurements ?

Chief Executive's Response:

The standards identified in the Technical Standards section are as per national standards and are thus appropriate, subject to the comments in Section 8.1: Transportation re all references related to the NRA DMRB being updated to TII Publications.

Chief Executive's Recommendation 16.2:

No amendments recommended.

M. Timony: DCDP-115

Raises a specific query re Donegal Town parking.

Chief Executive's Response: This issue will be most appropriately addressed in the Local Area Plan for Donegal Town, work on which is due to commence Spring, 2024.

National Transport Authority: DCDP-239

Recommends the incorporation of design standards for: cycle parking; and for facilities (eg. showering) in new commercial developments to encourage sustainable modes of travel.

Chief Executive's Response:

Parking standards are already provided in Table 16.6. This Table is headed: 'Car Parking Standards' and, on foot of the NTA comment, this table would be more appropriately titled: 'Car Parking and Cycle Parking Standards'.

Section 18: Buncrana Area Plan

This section is illustrated by three maps attached at the end of the section:

- Map identifying Potential Housing Sites, with Chief Executive's Recommendation indicated.
- Map identifying Urban Zones, Rural/Agricultural Zones and Established Development Zones disaggregated by 'With Flood Risk' and 'Without Flood Risk'.
- Map identifying all site-specific submissions received in respect of Buncrana.

18.1 Housing and Core Strategy

Section 3: 'Core Strategy' of this Report sets out the recommended revised Core Strategy housing land allocation for Buncrana, which revisions were prepared on foot of OPR recommendation 2. For Buncrana, the requirement is 681 units or 19.4 hectares (on basis of 35 units per hectare).

OPR recommendation 3 then requires the Planning Authority to:

- (i) review and revise the core strategy and its determination of the area of land required to be zoned to accommodate primarily new residential development (New Residential (Phase 1)), by taking account in its detailed analysis and calculations of the potential housing yield of lands proposed to be zoned for a mixtures of residential and other uses, including:
 - (a) Urban Core;
 - (b) Established Development;
 - (c) Opportunity Site; and
 - (d) Settlement Consolidation Sites.
- (ii) revise the land use zoning maps by reducing the area of New Residential (Phase 1) to reflect the revised core strategy and omit New Residential (Phase 2) lands for Buncrana, Ballybofey / Stranorlar and Bundoran.

To comply with this requirement the following analysis was undertaken:

- i.) a review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the Urban Core, Established Development and brownfield Opportunity sites;
- ii.) identification of vacant and derelict properties not captured in i).

A detailed breakdown of this analysis is provided at the end of this section of the report. The analysis identifies a potential yield from brownfield sites of the order of 176 units. Thus, the portion of the housing supply target required to be met by, and associated housing land allocation for, greenfield lands (@ 35 units per hectare) for Buncrana may be summarised as follows:

Revised Housing Target	681 Units
Minus potential yield from brownfield sites	176 Units
Adjusted Required Housing Target	505 Units

Housing Land Allocation (Greenfield) @ 35 units per Ha	14.4 Ha
Chief Executive's Recommendation 18.1:	
To adjust the Core Strategy table in line with the conclusions above, and to proceed to assess residential land supply options in this context.	
(This is considered to be a Material Alteration)	

18.1.1 Housing Supply Options Review

In accordance with the NPF, the Development Plan Guidelines and the Planning and Development Act 2000, the Planning Authority is effectively restricted to zoning a certain quantum of residential sites in compact, serviced, accessible locations based on the relevant Core Strategy housing supply targets and associated zoned housing land requirement for that settlement.

Recommendation 18.1 above provides for a nett target of 505 units/14.4 hectares for Buncrana based on a density of 35 units per hectare.

In addition, to provide a degree of choice and avoid restricting supply through inactivity on particular landholdings, Section 4.4.3 of the Development Plan Guidelines effectively facilitates an additional provision of residential lands over and above the Core Strategy target subject to, inter alia, a maximum of 20-25% of the required quantum of zoned land and the lands being serviceable and sequential. Given the significant undersupply/inactivity on existing residential zonings during the last decade and indications during public consultation that landowners are reluctant to release sites for development, it is therefore considered appropriate to also facilitate such additional provision of zoned housing lands in the quantum of another **126 units** (ie. 25% of the gross requirement of 505 units); **126 units @ 35/hectare** = an additional requirement for **3.6 hectares** over and above the nett Core Strategy housing land allocation set out above.

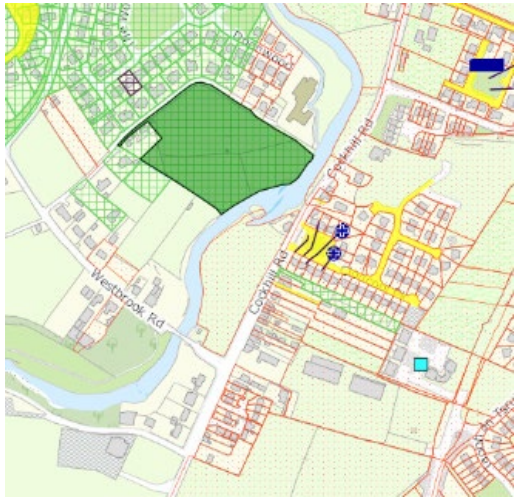
The finalised target therefore is 176 units; 631 @ 35/hectare = 18.02 hectares.

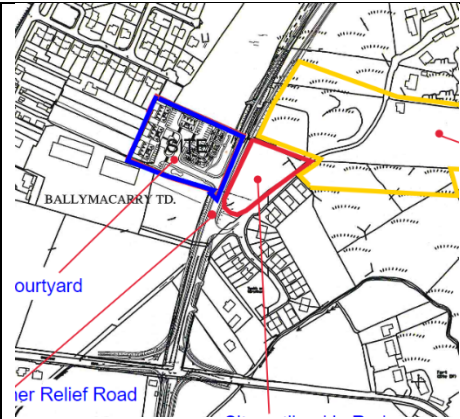
Furthermore, it is a policy and objective of Section 4.4.1 of the Development Plan Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. It is therefore also considered appropriate to retain serviced and developable land zoned for residential purposes which were previously identified in the County Development Plan, 2018-2024.

The recommendations that follow in relation to residential land supply have been made in the above-noted context.

18.1.2 Optimal Sites To Meet Land Supply Target (Plus 25%)

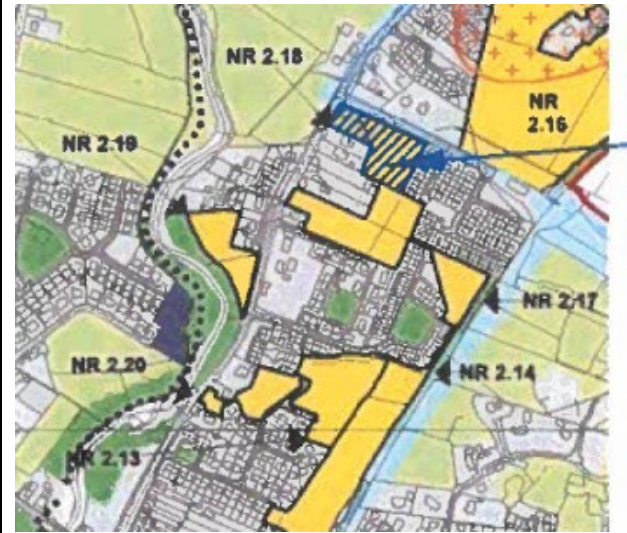
The top-ranked sites required to meet the Core Strategy plus 25% target are identified in descending order of rank in the table below. The table also notes where the OPR has recommended against zoning the site and, as appropriate, a rationale for not agreeing with the recommendation.

Draft Plan Site Ref & Submission ref:	Yield (@ 35 per hec)	OPR REC. TO OMIT?	Chief Executive’s Response to OPR Recommendation
NR 1.1	(2.2ha) 77	No	
NR 1.3	(.92ha) 32	No	
NR 1.4	(1.86ha) 65	No.	
NR 1.5	(1.03ha) 35	No	
NR 1.6	(3.551ha) 120	No	
NR 1.7	(1.57ha) 54	No.	
NR 1.9	(1.32ha) 46	No	
NR 1.10	(.58ha) 20	No	
Submission ref: DCDP 92 (Tullyarvan).	(1.0 ha) 35		
			
NR 2.13	(1.03ha) 35	Yes	CE recommendation is to rezone these 6 no. parcels of land from NR phase 2 to NR Phase 1. The lands are preferably located and proximate to other phase 1 lands and established residential areas with all existing services available.
NR 2.14	(1.08ha) 35	Yes	
NR 2.15/ Submission ref: DCDP 97	(.3)ha 9	Yes	



Section 4.4.1 of the Development Plan Guidelines provides that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. All seven sites listed above are serviced and can be developed for housing during the life of the Plan. The recommendation below is made having regard to the aforementioned.

NR 2.17	(.48ha) 16	Yes
NR 2.18/ Submission ref: DCDP 273 (second item).	(1.86ha) 65	Yes



NR 2.19	(.6ha) 21	Yes
NR 2.20	(.45ha) 15	Yes
DCDP-273 (third item)	???	



Notes:

- (i.) 'NR' labels refer to site refs. in the Draft Plan;
- (ii.) 'DCDP' labels are for submissions made on the Draft Plan

Chief Executive's Recommendation 18.2:

- a) To zone the sites identified in the table above as New Residential Phase 1; and**
- b) To publish those sites that would constitute a material change to the Draft Plan as Proposed Material Alterations.**
- c) Insert the following policy in respect of Site Subm. Ref. DCDP-92:**

BC-H-P-1.(6).a. Developers will be required to engage with the Roads service of the Council in the relation to the provision of pedestrian footpaths and the realignment/reconfiguration of the junction with the Westbrook Road, including the achievement of the necessary vision lines.

c. Design to provide for future pedestrian and cyclist permeability through lands to the south-west of the site connecting onto the Westbrook Road.

d. Surface water management details shall be required to ensure that the risk of pluvial flooding is not increased as a result of the development.

(These are considered to be material alterations).

18.1.3 Recommendations Against Residential Zoning

Several sites are not recommended for residential zoning. These sites were either:

- a. sites not zoned in the Draft Plan but on which submissions proposing zoning for residential use were received;
- b. sites that were zoned in the Draft Plan but are now the subject of OPR requirements to omit them; or

- c. one further site is recommended by the Executive to be rezoned from New Residential to 'Strategic Residential Reserve'.

The sites are identified on Map 18.1 and in the tables below. The rationale contained in submissions requesting the zoning of sites are also noted.

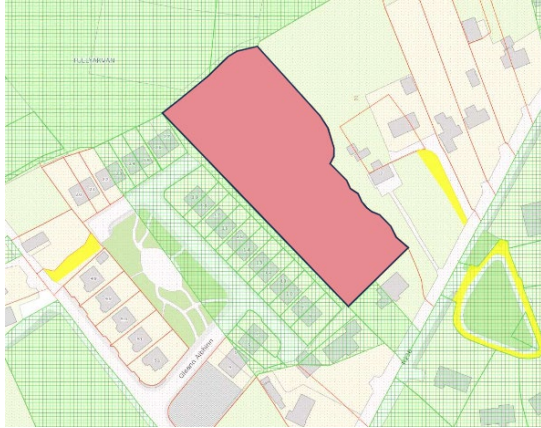
These sites are not supported based on: (i.) higher scoring alternative sites (the infrastructure assessment is attached at the end of this section of the report) identified to meet the Core Strategy requirement as referred to above; and (ii.) in some instances, site-specific issues – responses to these specific issues are also set out below .

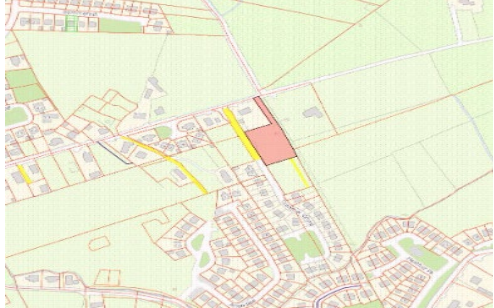
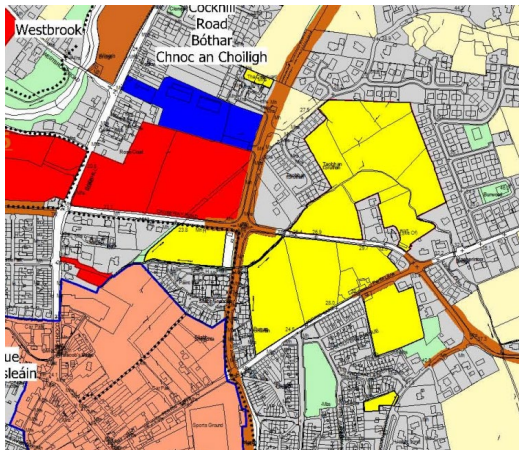
18.1.3.1 OPR Recommendation 5(i.)(a.)

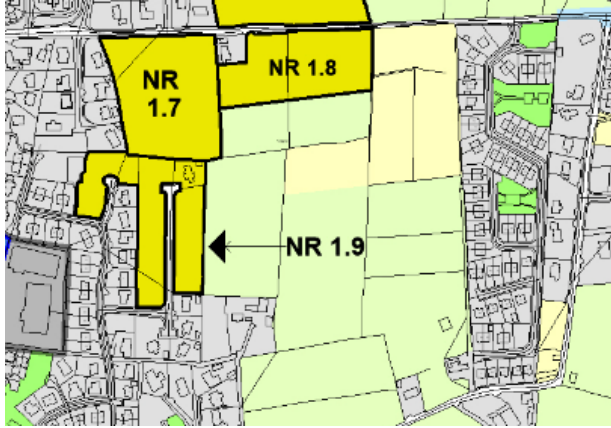
<p>OPR recommendation 5(i.) requires the Planning Authority to omit the sites identified as:</p> <ul style="list-style-type: none"> (a.) NR 1.11 and NR 1.12; and (b.) 2.13, 2.14, 2.15, 2.16, 2.17, 2.18, 2.19, 2.20. <p>The OPR makes this recommendation on the basis of the peripherality of the sites, and therefore the inconsistency of zoning such sites with the national climate change and compact growth policy agenda.</p> <p>(Sites 2.13, 2.14, 2.15, 2.17, 2.18, 2.19, 2.20 are addressed in Section 18.1.2.)</p>
<p>Chief Executive’s Response:</p> <p>The Executive did not propose sites NR 1.11 and NR 1.12 for the same reasons as those set out in the OPR recommendation. The OPR’s rationale for site NR 2.16 is also acknowledged and agreed, having regard to the availability of a sufficient supply of more favourably-located sites as identified at Section 18.1.2.</p>
<p>Chief Executive’s Recommendation 18.3a:</p> <ul style="list-style-type: none"> (i.) To rezone sites NR 1.11 and 1.12 from 'New Residential Phase 1' to 'Rural Area' (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below. (ii.) To rezone site NR 2.16 from 'New Residential Phase 1' to 'Rural/Agricultural'. <p>(These are considered to be material alterations.)</p>

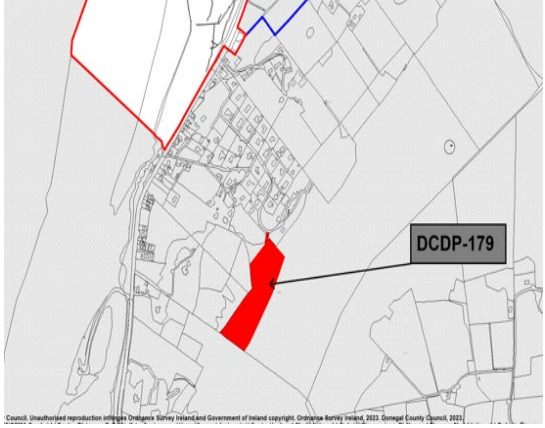
18.1.3.2 Sites Proposed In Submissions

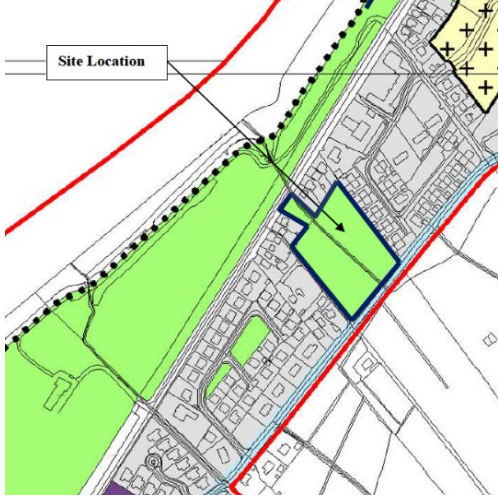
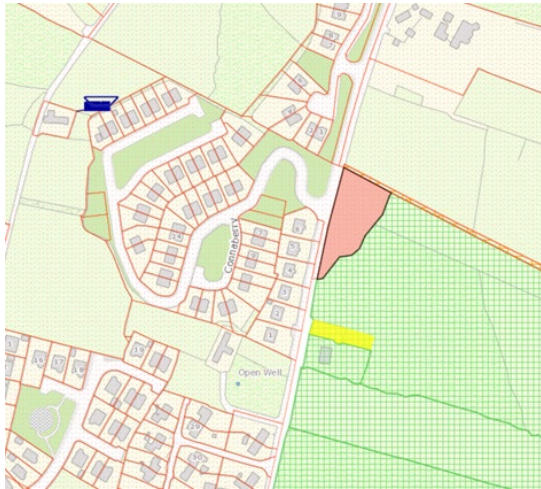
Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive’s Response
<p>Paul Mc Callion and Matthew Rudden. DCDP:6</p> <p>The lands are currently zoned as 'Residential (Phase 1)' therefore it is unfair to change this when the land is directly beside an existing housing estate which was always intended to be extended into these lands. Secondly, as ur clients purchased these lands with the intentions of development</p>	<p>The referenced adjacent '<i>lands to the north-west have indeed been re-zoned to New residential, Phase 1</i>' is noted. Of note here is that the OPR requires the Authority to omit this site to the north-west (identified in Draft Plan as NR 1.12). As noted above, the Executive did not</p>

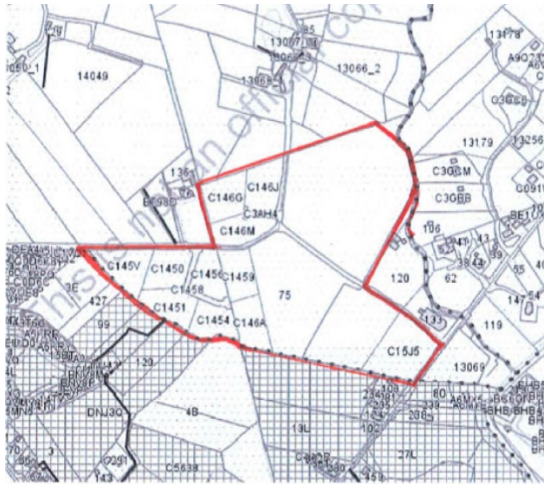
<p>Subm. Ref. No./Name; Rationale</p>	<p>Site Specific Issue and Chief Executive’s Response</p>
<p>them in conjunction with the lands mentioned above, they were waiting on the new development plan to be issued in the hope that the lands to the North-West would be re-zoned as ‘Residential (Phase 1)’ and the overall lands could be developed together. The lands to the North-West have indeed been re-zoned to ‘New Residential (Phase 1)’ under the new development plan but now our clients’ lands have been proposed to be re-zoned to ‘Rural/Agricultural’. As stated above this severely damages the development of these combined lands for multiple residential units.</p> 	<p>propose the inclusion of Sites NR 1.11 and NR 1.12 and therefore the OPR’s recommendation is agreed in this Report.</p>
<p>DCDP- 9: Submission from Michael Galbraith Architects on behalf of their client Sean Hegarty, Magherinture, Buncrana.</p> <p>The area is characterised by housing estates, namely Pairc Na hAluine, Cranmer Grove, Burwood, Summerhill, Allendale, and The Hawthorns, with a number of one of dwellings in the immediate area. The site in question is currently serviced, excavated and road make up in place and is ready for development, should planning permission be obtained.</p> <p>The current zoning of this land results in the land use of the site only being suitable for a one-off dwelling, which is not cost effective for our client as they purchased the site at a very high premium during the boom. Due to this factor our client wishes to develop the site for multiple residential units to make best use of a key site within the boundaries of Buncrana in a more cost-effective way. We consider the current zoning to be unreasonable for two reasons. Firstly, the lands are already serviced and ready for development to complete the overall development. Secondly, the land has a positive granted planning history for 12 no. apartments and 2 no. townhouses under planning reference: 07/71119, which expired on 17th March 2018. Due to the economic downturn constructing these units were not feasible at the time, but our client is ready to develop</p>	<p>The footpath network is not in place to ensure safe access to the town by either walking or cycling.</p>

Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive's Response
<p>if the land can be re-zoned as 'Residential (Phase 1)' within the proposed Donegal Development Plan 2024-2030.</p> 	
<p>DCDP 90: Michael Galbraith Architects on behalf of their client Anita & Jamie Friel. Lands located at Ballymacarry, Buncrana.</p> <p>There is an ongoing interest from our client to create much needed housing on this urban town site which already has frontage on to the main road and is surrounded by many other housing developments. Refers to previous positive engagement with Planning Authority at pre-planning stage. The land in this folio already has an existing railway cottage on it and the remaining site area is close to nearby services and housing estates. A need for housing development should be required in this particular area of Buncrana Town Centre. It was always our client's intention to develop this site...</p> 	<p>The Strategic Flood Risk Assessment prepared in support of the Draft Plan shows these lands being at risk of flooding, and thereby not suitable for highly vulnerable residential development.</p> <p>(nb. site is the site identified in white at south-west corner of roundabout)</p>
<p>DCDP-113: John Mc Cay Architect on behalf of his client Tommy Burns. Lands located at Ardravan</p> <p>This submission is on behalf of the landowner and relates to lands the subject of proposed site NR 1.8 in the Draft plan. This site is proposed as New residential phase 1, and currently</p>	<p>Whilst this site was supported in the Draft Plan, a detailed review has identified pedestrian safety issues arising from the absence of a footpath on this side of the public road. There are potential difficulties in achieving a safe footpath connection towards the centre due to the intervening</p>

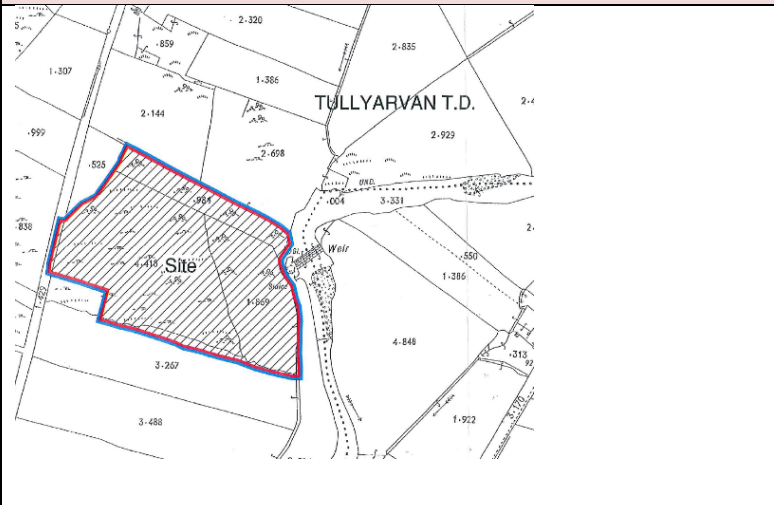
<p>Subm. Ref. No./Name; Rationale</p>	<p>Site Specific Issue and Chief Executive’s Response</p>
<p>zoned as Agriculture in the County development plan 2018-2024.</p> <p>These lands are currently in agricultural use and adjoin adjacent agricultural lands.</p> <p>The landowner in their submission seeks for these lands to be retained as being zoned for agriculture.</p> 	<p>private dwelling located immediately to the west and the third party ownership of site NR 1.7.</p>
<p>DCDP-179 : Submission received from BMA Planning on behalf of Development & Construction Ltd. Lands located at Lisfannon Heights, Fahan.</p> <p>The lands, with an area of c.3ha, are located immediately contiguous to the existing housing development known as Lisfannon Heights which includes a wide variety of detached house types (c. 40-50no.) on large plots dating from the 1970’s onwards.</p> <p>Site Feasibility studies undertaken for the landowners by McMullin Associates Architects show how the site can accommodate c. 6 detached houses in a pattern and density that is similar to the Gollan Hill development. The proposals make provision for a natural woodland area with paths and seating areas to provide a n amenity for the community and to act as a screening device for the development. from the lower ground.</p>	<p>As well as the site’s peripherality, a public sewer connection is not available. Uisce Eireann, working in partnership with DCC, plans to deliver the Buncrana Sewerage Scheme to include upgrades to the sewer network in order to address flooding, overflow and capacity deficiencies. This may in time provide public sewerage to the rural area between Buncrana and Fahan. However, at the present time this infrastructure is not in place.</p>

Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive's Response
 <p><small>Copyright. Unauthorised reproduction of Rights Ordnance Survey Ireland and Government of Ireland copyright. Ordnance Survey Ireland, 2013. Donegal County Council, 2021.</small></p>	
<p>DCDP-227 : North-West Modern Design on behalf of their client Kate Doherty.</p> <p>Lands located at Ludden, Buncrana.</p> <p>Site Synopsis:</p> <ul style="list-style-type: none"> • The site is located on the outskirts of Buncrana. • The site is within the control points on the current plan. • The site is serviced by the regional road L-1741-1. • The main sewer is located in close proximity to the site. • The Mains water is located along the frontage of the site. • Street lighting is located along the main road. • The site is zoned in current development plan as <i>residential reserve</i>. • <i>Applicant is requesting the lands be zoned as "new residential Phase1"</i> <p>Advantages :</p> <ul style="list-style-type: none"> • The proposed site is surrounded by established development and would lend its self to an infill development. • The proposed outer relief road runs past the site which will provide ease of access to same when complete. • The golf course has is proposed to be "<i>open space and recreation</i>" and this makes sense, to zone the parcel of lands the same is confusing the applicant. • There are parcels of land located along the R-238-8 which will not be granted access onto same and therefore are unable to be developed that could be zoned as "<i>open space and recreation</i>". This parcel of lands have access onto a Local road. • Buncrana are lacking in housing and this parcel of land would easily accommodate a development with little impact to the surrounding area. 	<p>The Strategic Flood Risk Assessment prepared in support of the Draft Plan shows these lands being at risk of flooding, and thereby not suitable for 'highly vulnerable' residential development.</p>

<p>Subm. Ref. No./Name; Rationale</p>	<p>Site Specific Issue and Chief Executive's Response</p>
 <p>A map showing a residential area with a red line indicating a boundary or road. A blue highlighted parcel is located in the northern periphery of the town. A label 'Site Location' with an arrow points to the blue parcel.</p>	
<p>DCDP-245: Submission received from MG Architects on behalf of their client.</p> <p>The submission seeks rezoning of lands from Agriculture/Rural to residential phase 1. The site is located on the northern periphery of the town.</p>  <p>A map showing a residential area with a blue highlighted parcel. The map includes labels for 'COMMUNITY' and 'Open Well'.</p>	<p>The site is currently zoned as Rural/Agriculture which provides for an individual housing need under limited circumstances. The parcel of land is in an area which is physically removed from the urban core and the amenities and services therein. Active travel is not available and so any development would be solely dependent on the private car. For this reason, the site scored poorly in the infrastructure assessment in addition to the availability of wastewater sewer only within the lifetime of the plan.</p>
<p>DCDP 226 and DCDP-241: Harkin Developments Ltd; and</p> <p>Lands located at Cashel Na Cor, Buncrana. Housing shortage.</p>	<p>The issue of emergency accommodation for MICA-affected owners is addressed elsewhere in this Report with the conclusion that such needs can be dealt with under emergency legislation as and when the need arises.</p> <p>The proximity to the Cashel-na-Cor Resource Centre is also noted but does not overcome the</p>

Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive's Response
<ul style="list-style-type: none"> The housing development above Casel-na-Cor has been confirmed with Mica and will have to be demolished over the next few years. This parcel of lands could provide possible temporary housing to facilitate the rehousing of the homeowners while this work is completed, be it with modular temporary accommodation (up to 120 units) or permanent structure (80 houses). The rehousing of Mica homeowners is an urgent matter and the demand is expected to last for the next 20 years plus until all homes are fixed. The applicant will propose to extend the main sewer to the site and in turn will cater for the existing and proposed developments along the main road. There are 3 possible sewer connections i) immediately across the road ii) to the west of the site towards Tullyarvan iii) further along R238 back towards Cockhill. Street lighting is available in the area and there is justification for a footpath to be installed from Cockhill Bridge out as far as Cashel-na-Cor to facilitate safe pedestrian access for the young adults who attend the Resource Centre and residents who use mobility scooters. The applicant will propose to work in conjunction with DCC and landowners to secure same. Residential development of the land at Cashel-na-Cor could include the widening of the road going through the land connecting the R238 to the Dunree Road. This would give residents in the area an alternative route into Buncrana town and reduce the traffic congestion at Westbrook Bridge and the additional tourist traffic expected following the opening of the new Dunree Visitor Attraction. <p>Cashel na Cor resource centre is located on adjoining land to the immediate north-east which provides day care for adults with special needs.</p> 	<p>fundamental issue of the peripherality of the site.</p>
<p>Finlay Lynch DCDP-222</p> <p><u>Rationale for Change of Zoning</u></p> <p>In our opinion the site as shown on attached maps has the benefit of public services, is adjacent to other multiple residential developed lands and had the benefit of a previous planning permission.</p>	<p>n/a</p>

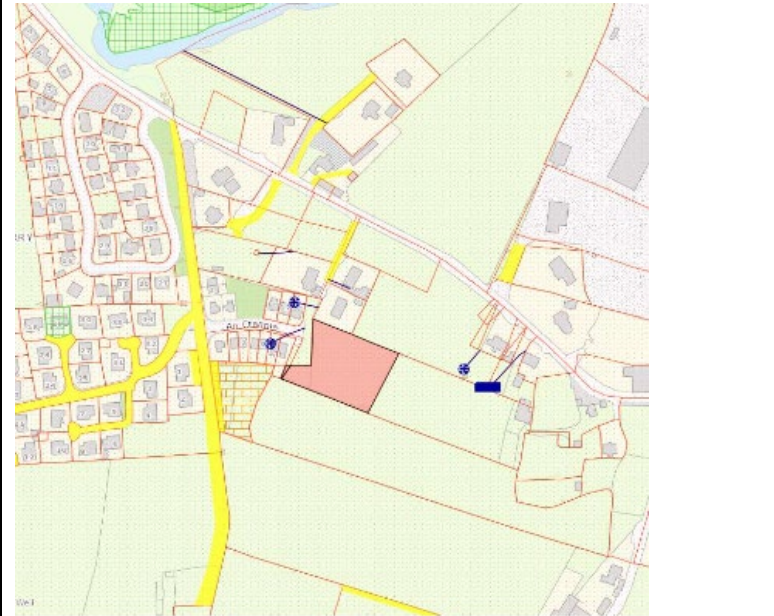
Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive's Response
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Ronald Mc Groy DCDP-7

The site in question is currently serviced, excavated and road make up in place and is ready for development, should planning permission be obtained.

There are intervening lands of similar scale located closer to main road and therefore within the boundary.



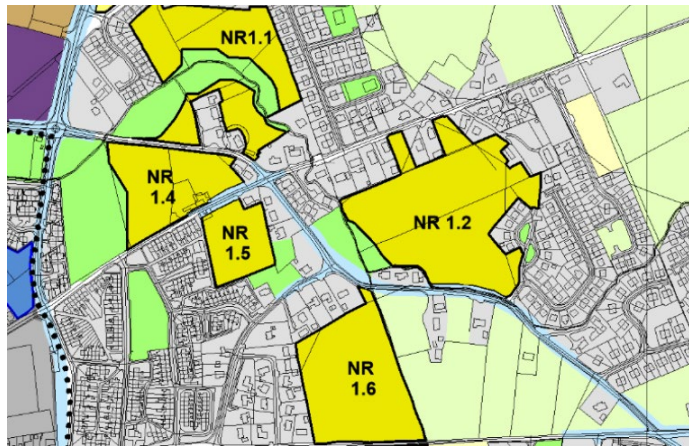
The current zoning of this land results in the land use of the site only being suitable for a one-off dwelling, which is not cost effective for our client as they purchased the site at a very high premium during the boom. Due to this factor our client wishes to develop the site for multiple residential units to make best use of a key site within the boundaries of Buncrana in a more cost-effective way. The lands are already serviced and ready for development to complete the overall development. It was always our clients wish to construct a 'Phase 2' option to the overall site at An Crannla but due to the economic downturn constructing additional units were not

Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive’s Response
<p>feasible at the time, but our client is ready to develop if the land can be re-zoned as ‘New Residential (Phase 1)’. Our client has already got planning permission for 2 no. semi-detached dwellings on lands between the existing housing development and the proposed site. Works are currently progressing on site, with deposits already paid for both dwellings by two interested parties. This proves our clients commitment to completing Phase 2 of the development, if re-zoning of the lands can be considered.</p>	
<p>Andrew Moore DCDP- 275: Lands located at Ludden</p> <p>Site Synopsis:</p> <p>The site is located on the outskirts of Buncrana (shown above outlined in red). It is serviced by the L-1741-1. The site was zoned in the previous development plan as <i>agricultural/rural</i> and is proposed to be zoned as <i>agricultural/rural</i> in the new development plan.</p> <ul style="list-style-type: none"> • The site is serviced by a main sewer and mains water. • The outer relief road is proposing to pass the site <p>The site was zoned for residential in recent plans and the applicant is proposing to have this parcel of lands rezoned as “new residential (phase 1)”</p> 	
<p>Chief Executive’s Recommendation 18.3b:</p> <ol style="list-style-type: none"> 1) To rezone the site subject of submission ref. no. DCDP-6 from ‘Rural/Agricultural’ to ‘Rural Area’ (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below. 2) To retain the ‘Strategic Residential Reserve’ zoning on the site subject of submission ref. no. DCDP-9. 3) To rezone the site subject of submission ref. no. DCDP-90 from ‘white lands’ to ‘Open Space and Recreation’. 4) To rezone site NR 1.8 and subject of submission ref. no. DCDP-113 from ‘New Residential Phase 1’ to ‘Strategic Residential Reserve’. 5) That the site subject of submission ref. no. DCDP-179 remains outside of the settlement boundary. 6) To retain the zoning of the site subject of submission ref. no. DCDP-227 as ‘Open Space and Recreation’. 7) To rezone the site subject of submission ref. no. DCDP-245 from ‘Rural/Agricultural’ to ‘Rural Area’ (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below. 8) That the site subject of submission ref. no. DCDP-226 and DCDP-241 remains outside of the settlement boundary. 	

Subm. Ref. No./Name; Rationale	Site Specific Issue and Chief Executive's Response
<p>9) To rezone the site subject of submission ref. no. DCDP-222 from 'Rural/Agricultural' to 'Rural Area' (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below.</p> <p>10) To rezone the site subject of submission ref. no. DCDP-7 from 'Rural/Agricultural' to 'Rural Area' (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below.</p> <p>11) To rezone the site subject of submission ref. no. DCDP-275 from 'Rural/Agricultural' to 'Rural Area' (ie. outside of settlement boundary) in accordance with the revised settlement boundary recommended at Recommendation 18.5 below.</p>	
<p>(Items 1, 3, 4, 7, 9, 10 and 11 are considered to be material alterations.)</p>	

18.1.3.3 Executive Recommendation To Rezone Draft Plan Site Ref. NR 1.2

The Executive's overall review of the residential land supply identified significant gaps in the footpath network needed to connect the site at Ardavan (identified in the Draft Plan as NR 1.2) with the existing network on the Hillcrest Road. Having regard to the availability of other serviced and more serviceable sites sufficient to meet the land requirement, it is considered that this site should not be zoned for residential development in this Plan. It is considered prudent to retain the site as 'Strategic Residential Reserve'.



Chief Executive's Recommendation 18.3c:

To rezone Draft Plan site ref NR 1.2 from 'New Residential Phase 1' to 'Strategic Residential Reserve'.

(This is considered to be a material alteration.)

18.1.4 Cockhill Neighbourhood Centre

OPR DCDP-211

In the narrative of its submission, the OPR comments as follows:

'The Office also has concerns over the inclusion of a neighbourhood centre to the north east of Buncrana at Straboe. While the Office accepts that it is necessary to provide local services that people can access by active modes, the draft Plan contains insufficient details and safeguards to ensure that the centre would be consistent with the requirement for objectives to promote sustainable settlement and transport strategies. The written statement is silent on the nature and scale of the neighbourhood centre and the range of services it would provide. The location indicated on the land use zoning map is also very extensive.'

The OPR then includes the following 'Observation':

Observation 2 - Neighbourhood centre

The planning authority is advised to put in place clear objectives or policies to guide and appropriately limit the nature, scale and location of the proposed neighbourhood centre for Straboe, Buncrana, and to more clearly define an appropriate location for the centre, having regard to the mandatory objectives under section 10(2)(n) of the Planning and Development Act 2000, as amended.

Chief Executive's Response:

The concerns of the OPR in terms of 'details and safeguards to ensure that the centre would be consistent with the requirement for objectives to promote sustainable settlement and transport strategies' are accepted. Given the scale and nature of development in Cockhill including the school, church, local shop and extensive residential development, it is still considered that the inclusion in the Plan of the neighbourhood centre concept is appropriate, subject to the addition of a policy setting out that only neighbourhood-scale development will be considered.

Chief Executive's Recommendation 18.4:

Retain the identification of the Cockhill Neighbourhood Centre in the Plan, subject to the addition of the following:

- a) Amend Policy GEN-ED-1, Chapter 17 as below (existing text in black; **new text in blue**):

Only support the provision of professional services, where the services proposed are provided principally to visiting members of the public, within land zoned as 'Urban Core' **and the Cockhill Neighbourhood Centre, Buncrana**. (Professional services includes dentists, solicitors, beauty therapists/hairdressers, physiotherapists)

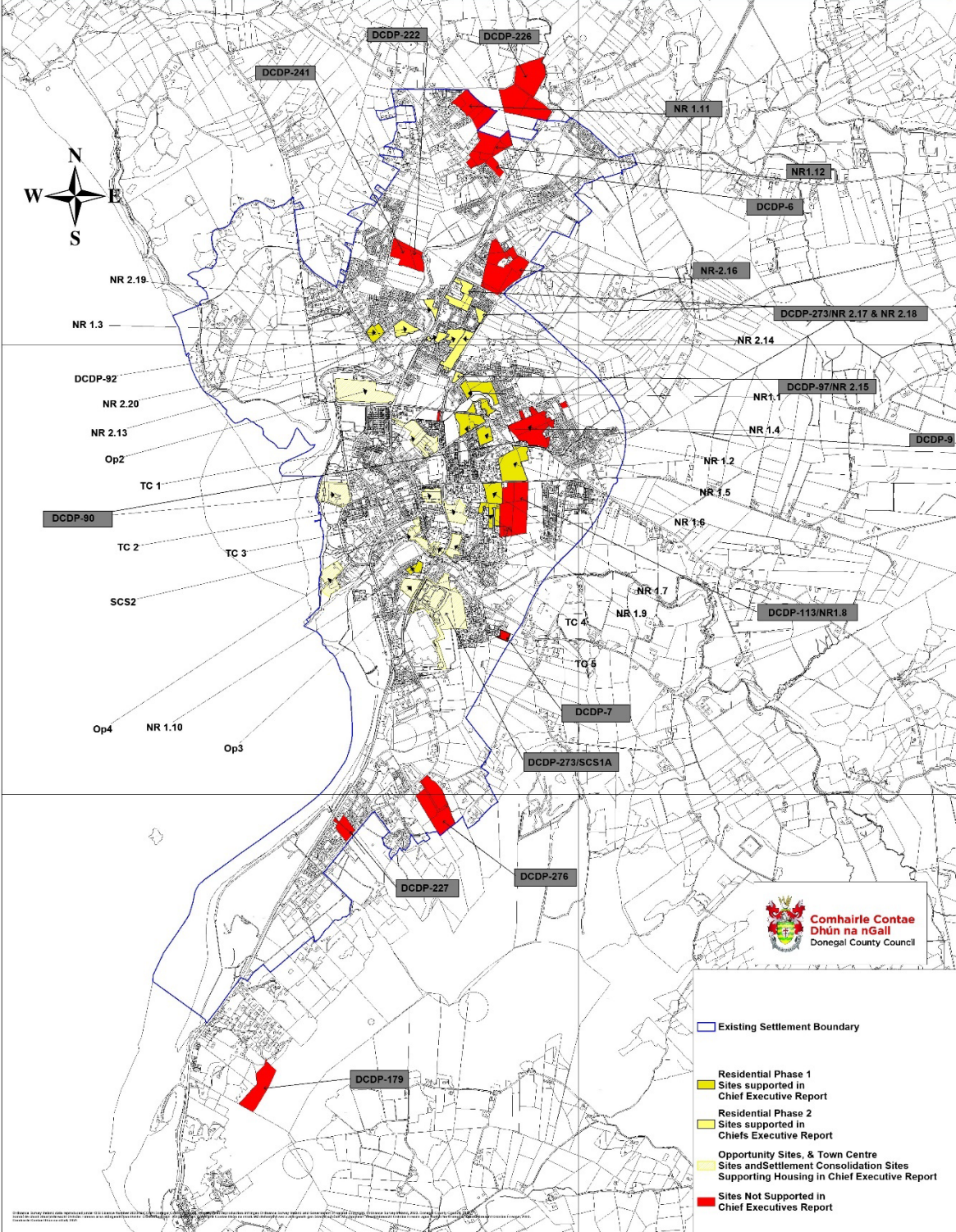
- b) Insert additional narrative in Chapter 18, Buncrana Area Plan:

Cockhill Neighbourhood Centre

The Cockhill area is an established community containing significant areas of housing, St. Mary's Chapel, St. Oran's National School, a filling station and shop, beauty studio and Crana College. Having regard to the scale of development and the distance from the town centre, the principle of further small-scale neighbourhood development is considered acceptable. (please refer to Policy GEN-ED-1, Chapter 17).

(This is considered to be non-material.)

**Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 18.1 (Buncrana): Identification of Potential Housing Sites, With Chief Executive's Recommendation Indicated;**



Settlement Capacity Audit

OPR recommendation 9(i.) requires that the Authority:

(i) provide a settlement capacity audit, as necessary, to establish the evidence-base and the status of all lands proposed to be zoned under the Plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, that is:

- (a) road and footpath access including public lighting;
- (b) foul sewer drainage;
- (c) surface water drainage;
- (d) water supply and/or additional service capacity;

including a written analysis to determine lands that are serviced (tier 1) and lands that are serviceable zoned land during the plan period (tier 2), including a costing estimate for the delivery of same;

The audit for Buncrana is provided below.

SETTLEMENT CAPACITY AUDIT.					
Previous Site ref. and Proposed Zoning ref:	Rd, footpath & public lighting.	Foul sewer.	Surface water sewer.	Water supply.	Written Analysis re tier 1 & tier 2.
NR 1.1	Y	Y	Y	Y	All services available. Site is Tier 1 and zoned as NR Phase 1.
NR 1.3	Y	Y	Y	Y	All services available. Site is Tier 1 and zoned as NR Phase 1.
NR 1.4	Y	Y	Y	Y	All services available. Site is Tier 1 and zoned as NR Phase 1.
NR 1.5	Y	Y	Y	Y	Potential to provide footpath along site frontage as part of any development of the site. Site is Tier 1 and zoned as NR Phase 1.
NR 1.6	N	Y	Y	Y	All services available. Footpath connection at south-west corner of site achievable utilising setbacks of the two existing dwellings.
NR 1.7	Y	Y	Y	Y	All services available.
NR 1.9	Y	Y	Y	Y	All services available.
NR 1.10	Y	Y	Y	Y	All services available.

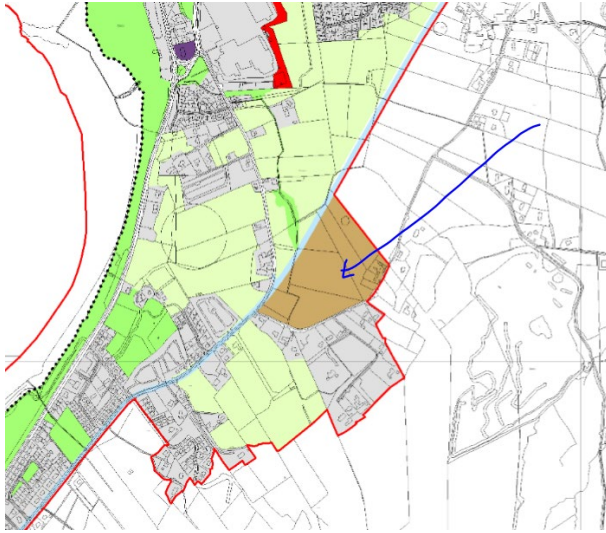
SETTLEMENT CAPACITY AUDIT.					
Previous Site ref. and Proposed Zoning ref:	Rd, footpath & public lighting.	Foul sewer.	Surface water sewer.	Water supply.	Written Analysis re tier 1 & tier 2.
DCDP-92	Y	Y	Y	Y	All services available. Bridge upgrade programme during life of Plan.
NR 2.13	Y	Y	Y	Y	All services available.
NR 2.14	Y	Y	Y	Y	All services available.
NR 2.15/DCDP-97	Y	Y	Y	Y	All services available.
NR 2.17	Y	Y	Y	Y	All services available.
NR 2.18	Y	Y	Y	Y	All services available.
NR 2.19	Y	Y	Y	Y	All services available.
NR 2.20/DCDP-273	Y	Y	Y	Y	All services available.

Part 9(ii.) of the OPR recommendation also requires the Authority to amend the land use zoning objectives for the town to ensure that lands that are neither serviced nor serviceable during the life of the Plan are not zoned for development. Members are advised that the recommendations above would provide for compliance with this requirement.

18.5 Zoned Employment Lands

OPR DCDP-211**Lance Feaver DCDP- 152**

OPR Recommendation 14 requires the Authority to omit the green field site located to the southeast of Buncrana towards Ludden.



Lance Feaver suggests that the that the Draft Plan does not appear to have any zones and related objectives and policies specific to industrial and business activities and this should be separated out (e.g. Business Zone, General Industrial Zone and Heavy Industrial Zone) and there is a shortfall in industrial zoning.

Chief Executive Response:

Lands zoned within the town core as opportunity sites, SDS and brownfield town centre sites already offer a suitable urban core and edge of urban core location for a certain category of employment generating business and enterprise uses that can be sited alongside other land uses and make good neighbours. In accordance with need as established by the Council's Economic Development Directorate the following evidence-based justification can be provided:

1. Buncrana would benefit from strategic serviced land initiatives to promote economic development and job creation. In the event of future serviced land initiatives, Buncrana would benefit from this site being within this initiative subject to future funding opportunities being pursued.
2. Ensure an identification of suitable such land banks for acquisition if necessary, using local authority statutory powers.
3. Enable cross-sectional master planning of such sites to maximize the most appropriate blended use to include enterprise zones.
4. Invest in the utility and access infrastructure to have developable ready landbanks/sites for the master-planned purposes.
5. In Buncrana, where businesses, particularly indigenous businesses in both the light industrial, engineering and business/financial services sectors, are seeking serviced sites to enable them to grow and scale their businesses particularly in light of the challenges, and indeed opportunities, emerging from Brexit and given Buncrana and Inishowen's close proximity to Derry.

With regard to the comments of Mr. Feaver, the Draft Area Plan is considered to be robust and proportionate in terms of the identified opportunities for business/enterprises development. These include: 'Opportunity Sites'; Settlement Consolidation Sites; and 'Business and Enterprise' sites.

Chief Executive's Recommendation 18.5:

No change recommended.

18.6 Active Travel

National Transport Authority DCDP 239

Recommends that the plan seeks to prepare a detailed local transport plan for Buncrana during the lifetime of the plan in accordance with the ABTA.

Chief Executive Response:

Agreed.

Chief Executive's Recommendation 18.6:

Insert the following objective:

BC-AT-O-xx: To prepare a detailed Local Transport Plan for Buncrana during the lifetime of the plan in accordance with the NTAs/TIIs Area Based Transport Assessment manual.

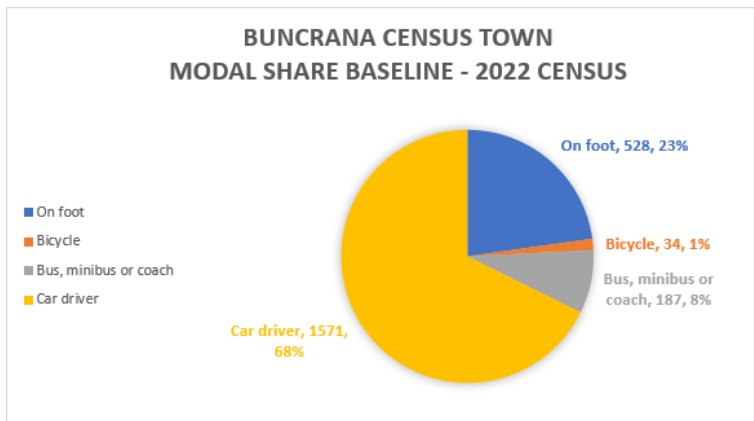
(This is considered to be non-material.)

OPR DCDP- 211

Recommendation 6 requires the inclusion of individual modal share targets for Buncrana over current baseline levels.

Chief Executive Response:

The current baseline data indicates pedestrian and bus transport modes share of 23% and 8% respectively, (CSO 2022).



An increase in this modal share by active/sustainable travel modes will not only require the implementation of the transport/sustainable mobility projects detailed in the plan but also additional local public transport services and other measures to encourage sustainable mobility. The Local Transport Plan is the most appropriate mechanism to carry out adequate evidence-based research into this issue and to identify the extent of such services and any additional measures necessary to increase modal share. As such it is considered premature to indicate a modal share target for Buncrana prior to the preparation of said detailed transport plan.




Chief Executive’s Recommendation 18.7:

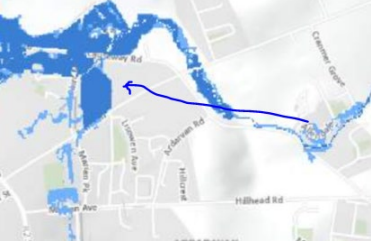


Insert the modal share diagram as referenced above.



(This is considered to be non-material.)

18.11 Surface Water and Flooding

The recommendations of the OPW in respect of established development areas are addressed in Section 18.4.

OPR DCDP- 211	
<p>Recommendation 16(i.) requires a review of various sites from a flood risk perspective and, where they do not pass the justification test, rezoning in accordance with Flood Risk Guidelines. (the 'BA' references below are taken from the Strategic Flood Risk Assessment [SFRA] prepared for the Draft Plan.)</p>	
Chief Executive Response:	
<p>BA-NRES-002 NR 2.19</p> 	<p>This flood risk area was identified in the SFRA and the boundary adjusted accordingly, with the Flood Risk Area to the west of the site zoned as 'Open Space and Recreation'.</p>
<p>BA-CI-003: 'Community Infrastructure' zoning off Causeway Road;</p> 	<p>The flood risk at this site was considered by the Department of Education during the process of acquiring the site. The Department was satisfied that the school campus could be achieved. Notwithstanding, Draft Plan Policy BC-ED-P-1 provides further safeguards:</p> <p>It is a policy of the Council to require that:</p> <ul style="list-style-type: none"> a. Any development vulnerable to flooding on the Community Infrastructure site along the Causeway Road must be located outside of the flood zones as identified in the Strategic Flood risk Assessment prepared to inform this Plan. b. Provision is made for emergency vehicle access to the site, outside of the flood zones.
<p>BA-NRES-006: NR 1.1</p> 	<p>This flood risk area was identified in the SFRA and the boundary adjusted accordingly with the intervening Flood Risk Area zoned as 'Open Space and Recreation'. Draft Plan Policy BC-H-P-1(a) provides further safeguards:</p> <p>(1.) (a.) Require that proposals for the development of Sites NR1.1 and NR 1.2 are accompanied by a site-specific flood risk assessment, unless otherwise agreed with the Planning Authority;</p>
<p>BA-NRES-009 (NR 1.4)</p>	<p>This flood risk area was identified in the SFRA and the boundary adjusted accordingly with the Flood Risk Area to the west zoned as 'Open Space and Recreation'.</p>

	
<p>BA-NRES-016 (NR 1.2)</p> 	<p>This flood risk area was identified in the SFRA and the boundary adjusted accordingly with the Flood Risk Area zoned as 'Open Space and Recreation'.</p> <p>Draft Plan Policy BC-H-P-1(a) provides further safeguards:</p> <p>(1.) (a.) Require that proposals for the development of Sites NR1.1 and NR 1.2 are accompanied by a site-specific flood risk assessment, unless otherwise agreed with the Planning Authority;</p> <p>Nb. Section 18.1.3.3 contains a recommendation to rezone this site as 'Strategic Residential Reserve'.</p>
<p>BA-OPS-001 (Opp. Site 4, Swilly Road),</p> 	<p>Having regard to the elevated nature of the site and most of the site being located outside of the flood risk area, no change is recommended in terms of zoning. The site-specific policy for this zoning is Policy BC-OPP-4 (p.287) and it would be prudent to amend the policy to include a requirement that any proposal for the development of the site must be accompanied by a site-specific flood risk assessment:</p> <p>[Existing text in black; new text in blue]</p> <p>BC-OPP-P-4: Support residential, leisure, tourism, or marine uses. Proposals shall be required to:</p> <ul style="list-style-type: none"> a) ensure any development does not materially detract from any aspect to/from the shorefront and/or from any of the approach roads into/out of the town; b) ensure any development reflects and respects the characteristics of the site as one of the most important and prominent sites within the town; and c) respect neighbouring building heights and orientation. d) include permeability to and from the site for active travel. <p>Any application for development must be accompanied by an appropriately detailed site-specific flood risk assessment.</p>
<p>BA-OPS-003 (Opp Site 2)</p>	<p>Small pockets of Flood Risk B identified. With most of the site being located outside of the flood risk area, no change is recommended in terms of zoning. The site-specific policy for this zoning is Policy BC-OPP-2 (p.297) and it would be prudent to amend the policy to include a requirement that any proposal</p>

	<p>for the development of the site must be accompanied by a site-specific flood risk assessment:</p> <p>[Existing text in black; new text in blue]</p> <p>BC-OPP-P-2: Support light industry, residential, employment or economic development uses. Proposals shall be required to:</p> <ul style="list-style-type: none"> a) respect and harness the context and setting of the Buncrana Castle Protected Structure and wider local context; and b) retain and integrate existing mature trees within the site. <p>Any application for development must be accompanied by an appropriately detailed site-specific flood risk assessment.</p>
<p>BA-SRR-003 (Strategic Residential Reserve Lands, Gransha Road)</p> 	<p>This flood risk area was identified in the SFRA and the boundary adjusted accordingly with the Flood Risk Area zoned as 'Open Space and Recreation'.</p>
<p>Chief Executive's Recommendation 18.8:</p> <p>Insert edits to Policies BC-OPP-P-4 and BC-OPP-P-2 as set out above.</p> <p>(These are considered to be non-material.)</p>	

18.5 Urban Regeneration and Town Centre

OPR Recommendation 10 is addressed in Section 5 of this Report.

18.6 Recreation, Community and Heritage

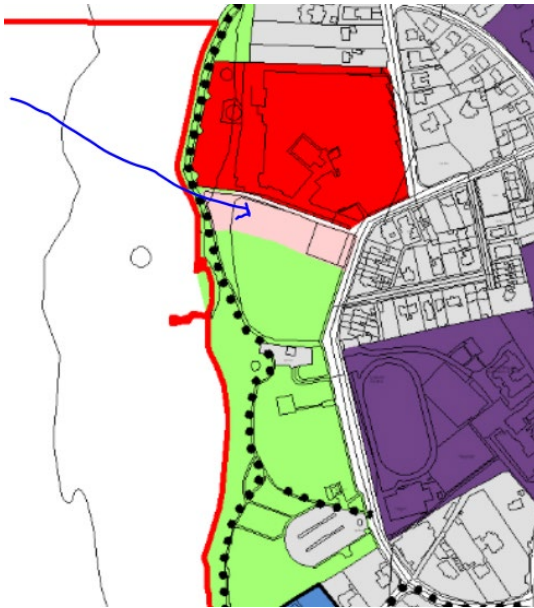
18.6.1 Proposed 'Tourist Facility' Zoning at Shorefront

All of the following submissions were made specifically and exclusively in relation to this proposed zoning:

Submission ref:	Name:
DCDP-107	Pauric O Flaherty
DCDP-109	Abi Storey
DCDP-110	Marius Narmontas
DCDP-114	M Healy
DCDP-116	Jennifer McLaughlin
DCDP-117	Jennifer McLaughlin
DCDP-121	Emmet Doherty
DCDP-122	Cathal Grimes
DCDP-123	Martin McLaughlin
DCDP-136	Hillary Fletcher
DCDP-137	Michael McGlinchey
DCDP-150	J Hegarty
DCDP-151	Brian Kavanagh
DCDP-153	Derek Murphy
DCDP-154	James McLaughlin
DCDP-155	Sarah O Gara
DCDP-156	Simon Latham
DCDP-157	Stephanie Porter
DCDP-158	Kate Mc Colgan
DCDP-159	Brendan Porter
DCDP-161	Patricia Grant
DCDP-162	Rosemary McArt
DCDP-163	Rosemary McArt
DCDP-165	Concerned Local Residents (numerous signatures)
DCDP-170	Mary Mc Kinney
DCDP-172	Rosemary Quinn
DCDP-173	Gerard McGinley
DCDP-174	Gloria McGinley
DCDP-176	Caroline Cunliffe
DCDP-187	Patricia McCallum
DCDP-195	Alice Gallinagh
DCDP-200	Finnbarr Murphy
DCDP-201	Oisin Murphy
DCDP-203	Fidelma Mc Laughlin
DCDP-204	Emile de Nijs
DCDP-214	N Turner

Submission Summaries:

Refer to the Draft Plan 'Tourist Facility Zoning' of land at the Shoregreen and compare this with the current CDP 2018-2024 zoning of 'Open Space and Recreation'.



All express concern at the proposed rezoning and the potential removal of the current use of the site. State that the tennis courts currently on the site are an asset greatly valued by both locals and visitors and their loss to the locality would be immeasurable. The submissions all seek the retention of the current zoning/use. Whilst most of the submissions are brief and make the simple request not to proceed with the zoning, the following details are also raised in others:

1. *The Importance of the Shore Front as Green Open Amenity Space for Buncrana. The Shore Front and in particular the Shore Green is a key amenity in Buncrana. The visual and recreational availability of them play a central role in maintaining Buncrana's character and position as a important scenic destination not only within Inishowen but indeed the broader landscape of Donegal.*
2. *The subject site is directly opposite a historic well preserved Victorian residential Shore Front terrace whose importance to the character of the town is confirmed by their inclusion in both the National Inventory of Architectural Heritage and Buncrana's proposed Architectural Conservation Area (ACA). This Victorian terrace is the only element of Buncrana's historic shore road included in the proposed Architectural Conservation Area and the placement of these potential new tourist facilities in front of same will undoubtedly dilute the character of the area and negatively impact upon this important part of the towns heritage. Indeed, as is the case with Moville's Architectural Conservation Area, Buncrana's Shore Green should be incorporated into the ACA in order that the character of this key asset in the town is carefully protected for future generations.*
3. *The site already includes existing recreational amenities that are extremely well used by local residents and visitors to the town. The first of these is the tennis courts, which are used on a daily basis throughout the year and indeed act as a important draw to the Shore Front. Similarly, the green space behind the tennis courts, which incorporates a wildflower meadow with cut pathways, is used extensively by individuals from the adjacent playground. The provision of such outdoor activities and unprogrammed spaces, which do not impact on the visual characteristics of the Shore Front are in line with the current Open Space & Recreation designation afforded to the Shore Front and the placement of any permanent structures be it touristic or otherwise would detract from same. It is important in this context to note that the Shore Front is a key public green space in the town, which*

as part of a finite stock of such spaces in Buncrana, should be protected from development at all costs.

4. *The shore green is part of the green amenity of the town which is very successfully managed and maintained by the Council for diversity of flora and fauna. Alongside this it acts as backdrop for the beach and Lough Swill beyond. The environmental importance of these sites for wildlife and tourism are recognised by the Council as evidenced by ongoing schemes to improve them including the Empowering Buncrana plan and the current upgrading of wastewater facilities in the town to improve water quality on the shore green beach. Given the climate crisis and current collapse of biodiversity, potentially reducing the amount of green open space in the town seems ill considered.*
5. *The Shore Front is served by a wide range of existing car parking facilities which principally exist towards the Southern end of the shore greens directly opposite the athletics track and swimming pool. The location of this parking has clearly been considered to take account of the aforementioned ACA, the local residents and visibility at the corner where Aileach Road meets Church Street. In looking to redesignate this zone the plan makes no consideration for the fact that this site is the most removed location from existing parking on the Shore Front. The idea of placing even more ancillary parking on the shore green than already exists to serve this new location is unjustifiable and the creation of another road access at this already busy location seems ill considered.*
6. *Understands that there is a covenant on the Shore Front site that prohibits the building of any permanent structures without the express agreement from local residents. This rezoning would pave the way for the contravention of this protective covenant.*
7. *The proposed rezoning would mean that in addition to the areas open for consideration under its current zoning of "Open & Recreation Space" other uses or developments would be considered including; Cultural Use/ Library, Restaurant and Tourist Related Facilities. Notwithstanding aforementioned numerous reasons cited for such developments being wholly unjustifiable in the proposed location on the Shore Front it should be noted that there are currently two large brownfield sites at both the North and South of the shore green which could accommodate such used in a much more sustainable manner without negatively impacting on the Shore Front.*
8. *The Shore Front plays a key part in the Repowering Buncrana project which seeks to enhance the existing townscape and create connections between the main street and the shore green. With this very much in mind it is important that the Council consider how redesignation of this zone at the bottom of Church Street would affect this connection very directly. One only needs to refer to the existing view looking down Church Street towards the Shore Front to see how the current unimpeded view of the shore green, the lough and Fanad peninsula would be lost and with it a very direct connection from the main street's commercial centre to the Shore Front. It is critical that the view from Church Street towards the lough is preserved and this long vista is kept free of any building or other entity which would impede and interrupt the spectacular sea view.*

Chief Executive's Response :

Zoning

The subject site (highlighted in yellow in the image below) forms part of the wider 'shore green' public area. The key issues of concern would appear to be based on the site's role in forming an integral part of the broad amenities of the wider shore green area, and the current active recreational (tennis courts) and passive (green space behind the tennis courts) recreational value of the site. These concerns would appear to be based on the fact that the proposed zoning would allow, in principle, for the consideration of buildings for 'Community/Recreation/Sports'; 'Cultural Uses/Library'; 'Restaurant'; and 'Tourist Related Facilities', and that such buildings would have a

significant detrimental impact on the broader shore green amenity, as well as result in the removal of the popular tennis courts. The issue of the covenant is considered to outside of the scope of planning.



This zoning proposal in the Draft Plan was not supported by the Executive. It is agreed that the subject area is an integral part of the shore green environment and experience, and it is also agreed that the zoning in the Draft Plan, if retained in the adopted Plan, would support the principle of development of a nature that could result in a material change to the area. The Draft Plan in Chapter 18, Section 18.2 includes a specific policy setting out the nature and range of development proposals open to consideration on lands zoned as 'Open Space and Recreation'. These objectives and policies ensure the local amenity value of these lands are protected and that any development would not significantly impact on the visual amenities, character and environmental quality of the area. It is considered that this zoning should be extended to cover the subject area as per previous plans.

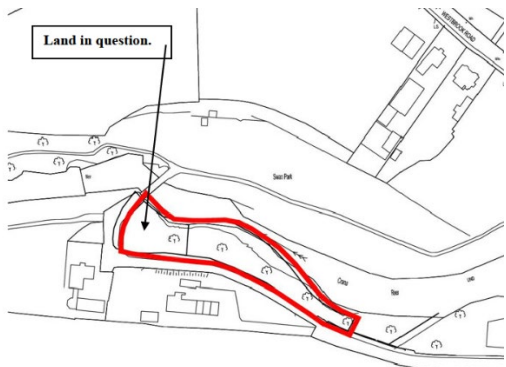
Chief Executive’s Recommendation 18.9:

Rezone the subject site from 'Tourist Facility' to 'Open Space and Recreation'.

(This is considered to be a material alteration)

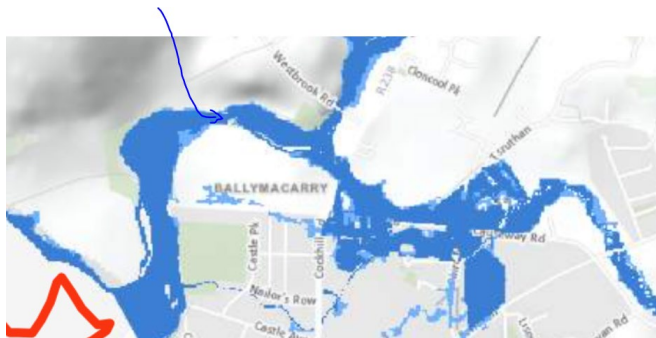
Denis Doherty DCDP-147 (Lands at Ballymacarry, Buncrana)

Seeks rezoning of lands from 'Open Space and Recreation' to 'Mixed Use'. Proposes to erect 'a small coffee shop outlet'. Lands are immediately adjacent to Swans Park. Traffic to and from the site is mainly pedestrian.



Chief Executive's Response:

The lands were zoned as 'Open Space and Recreation' in the Draft Plan as they were identified in the Strategic Flood Risk Assessment as being within Flood Zone A (mainly) with a small sliver also within Flood Zone B.



The current zoning is in accordance with best practice as set out in the Flood Risk Guidelines, and the requested rezoning would be contrary to the Guidelines.

Chief Executive's Recommendation:

No change recommended.

18.7 Opportunity Sites

Submission ref. no. DCDP-272 addresses Settlement Consolidation Site SCS1A. The submission proposes a residential zoning and is therefore addressed in Section 18.1.2 wherein the proposal is supported.

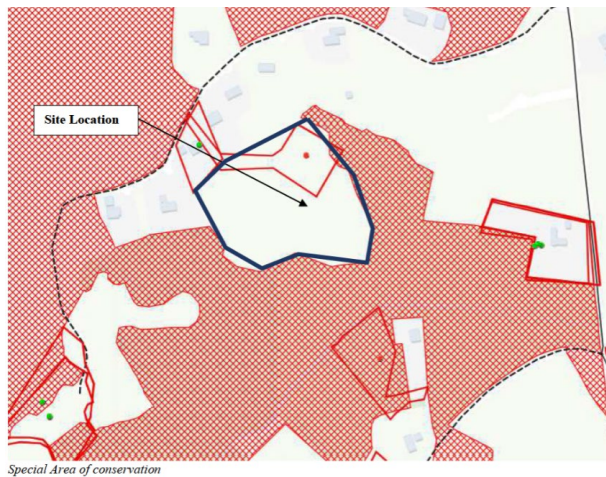
18.8 Miscellaneous Issues

Paddy Gallanagh DCDP- 225: Lands at Ballynarry

Rezoning of lands from 'Coastal Protection Area' to 'Rural/Agriculture'. Key points made in support of proposal are:

1. Family needs for housing; and
2. Whilst Special Area of Conservation (SAC) is immediately adjacent, the subject lands are outside the designated area.

(image from submission):



Chief Executive's Response: By resolution of Members, the subject lands are already zoned in the Draft Plan as 'Rural/Agricultural'. This zoning would allow for limited consideration of one-off housing in accordance with Draft Plan Policy GEN-H-2:

It is the policy of the Council to facilitate an appropriate provision of one-off housing in 'Rural/Agricultural' areas where the applicant can demonstrate that they need a new house at this location and can provide evidence that they, or their parents, have resided in those areas for a period of at least 7 years. All proposals shall be subject to all relevant material considerations, relevant policies of the Plan, other regional and national guidance and relevant Environmental Designations.

In the current CDP 2018-2024 and previous plans the subject lands are, and were, zoned as 'Coastal Protection Area' due to their scenic, coastal, visually vulnerable rural location and the habitat protection of the SAC. The associated policy in the current CDP is inserted below:

BC-NH-P-2: *It is the policy of the Council to conserve and protect the lands identified as 'Coastal Protection Area' on Map 13.1A: 'Buncrana Land Use Zoning Map', that accompanies this part of the Plan, with the exception of appropriate agricultural or recreational development. Proposals for agricultural or recreational development within the identified area will be considered having regard to all material planning considerations, all other relevant policies of the Plan, national/regional guidelines and having regard to all environmental and conservation designations.*

It can be seen that the current policy does not provide for one-off housing and, having regard to the characteristics and sensitivities of the site as outline above, it is considered that this approach is the more appropriate of the two in the public interest.

This is reflected in the recommendation below.

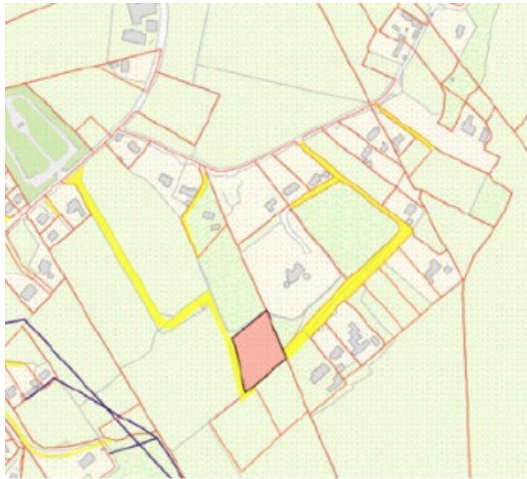
Chief Executive’s Recommendation 18.10:

To amend zoning of lands from ‘Rural/Agricultural’ to ‘Coastal Protection Area’.

(This is considered to be a material alteration.)

MG Architects - Client Lands At Ludden DCDP- 246

Requests that the lands identified on map below are excluded from within the Plan boundary.



Justification included with submission:

Our client does not live directly adjoining the land, therefore can not develop the site for a one-off dwelling. If the land is excluded from the town boundary, our client or their immediate family do comply with Section 47 rural policy and would be available to build a one-off house on their land if the site can be excluded from the Plan Boundary.

Chief Executive’s Response: Recommendation 18.5 recommends a new settlement boundary. The subject lands would be in the rural area as per the request, if the recommendation is agreed.

This is reflected in the recommendation below.

Chief Executive’s Recommendation 18.11:

Not to amend Plan.

Shay Mc Callion DCDP- 273

Seeks a change in zoning for a parcel of land from rural/agriculture to established development.

Justification included with the submission:



Submission Request:
Area Marked Blue Hatch to be changed from Rural / Agriculture to Established Development.
Rationale:
This Area has already a dwelling built on the site with Planning Permission for another leaving all this land as an established development area.

F

Chief Executive’s Response: The site is located adjacent to the Railway Road and fronting onto R248 on the southern approach to the town. The area is characterised by detached low density dispersed residential dwellings.



The site is zoned in the Draft Plan as ‘Rural/Agriculture’ which provides for an individual housing need in limited circumstances. Having regard to: the limited scale of the site; to the site being partly developed already with a dwelling, detached garage and shared access road; to the existing development on all sides of the site; and to previous permissions granted for another dwelling (refs. 21/52169; and 22/51348), it is considered appropriate to rezone these lands as ‘Established Development’.

This is reflected in the recommendation below.

Chief Executive’s Recommendation 18.12:

Amend zoning from Rural/Agricultural to Established Development.

(This is considered to be a material alteration.)

**Harley Planning Consultants Ltd. DCDP-65
Declan Heaney DCDP- 274 - Lands at Ludden**

Relates to land use zoning objective and policy for Rural/Agriculture land use zoning. The submission sets out concerns relating to the interpretation of the policy, consistency in the approach and possible anomalies arising.

The submission states that the wording of ‘have resided in those areas for a period of at least 7 years’ is where the confusion over where ‘those areas’ specifically refer to.

The submission recommends removing this policy and replacing with the 'Local environment' land use zoning as per the Letterkenny local area plan.

Chief Executive’s Response

It is considered that the objective of the policy in seeking to facilitate genuine farming family needs on family lands in the immediate hinterlands of Buncrana remains appropriate, given the pressures that would otherwise arise from the many residential developments located all around the settlement, with many of these being at significant distances from the urban core.

Chief Executive’s Recommendation 18.13:

Not to amend the Plan.

DCDP 138 Uisce Eireann

Section 2 of the submission notes that Transport and Utilities Infrastructure is referenced as a zoning on Table 17.1 but does not form part of the zoning tables in 18.1, 19.1 and 20.1.

Chief Executive Response

The reason the Transport and Utilities Infrastructure Zoning does not form part of the Zoning Matrix in Table 19.1 is that there is no such zoning within the Buncrana Land Use Zoning map. Nevertheless, in the interests of clarity it is considered appropriate to insert a row for water services infrastructure into the Zoning Matrix in Table 18.1 as recommended below.

Chief Executive’s Recommendation 18.14:

Insert the following row and associated footnote into Table 18.1 – Land Use Zoning Matrix for Buncrana.

Land Use	‘ Urban Core’	New Residential (Phase 1)	New Residential (Phase 2)	‘ Established Development’	Opportunity Site	Business/Enterprise	Community Infrastructure	Open Space and Recreation	‘ Rural/Agricultural’
Water/Wastewater Services	0	0	0	0	0	0	0	0 ²¹	0

Footnote 21:

Proposals for large scale water services infrastructure on lands zoned Open Space and Recreation (e.g. municipal wastewater/water treatment plant infrastructure, sewage pumping stations etc.) will not normally be acceptable within said zoning. Development applications for small scale water services infrastructure (e.g. individual wastewater treatment systems, watermains and sewers) will be open to consideration within said zoning if not otherwise exempted development. All development proposals will be subject to the requirements of the Flood Risk Management guidelines.

(This is considered to be a material alteration

Analysis Prepared In Respect of OPR Recommendation 3

To comply with this requirement the following analysis was undertaken:

- i.) a review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the Urban Core, Established Development and brownfield Opportunity sites;
- ii.) identification of vacant and derelict properties not captured in i).

The results of this analysis re Pt. i.) are set out below:

	Urban Core	Est. Dev. Areas	Opportunity Sites	Settlement Consolidation Sites	Total (over 6 yr period)
Residential Planning Applications (no. of units)	28	38	58	109	141 ⁴
Pre-planning enquiries (no. of units)		2	-	-	
V & D	34	114	58	2	35 ⁵
TOTAL yield from Urban Core, Established development, Brownfield Opportunity Sites and Vacant and Derelict Property opportunities.					176

Notes

1. The subtotals for planning applications and preplanning enquiries in the Urban Core and Est Development over the period 2013-2013 (10years) were weighted by 0.6 to generate the likely yield for these categories over the 6-year lifetime of the CDP 2024-2024.
2. The subtotal for Vacant and Derelict property refurbishment opportunities was weighted by 0.25 as a 25% yield from these properties is considered to be a realistic target.
3. Sites where more than one form of activity was recorded (eg. a site with both a pre-planning enquiry and a planning application) were counted only once.

Therefore the total projected housing yield from brownfield is calculated to be of the order of **176** units.

4

5

Section 19: Ballybofey/Stranorlar Area Plan

- Map identifying Potential Housing Sites, with Chief Executive’s Recommendation indicated. Recommended Revision of Settlement Boundary.
- Map identifying Urban Zones, Rural/Agricultural Zones and Established Development Zones disaggregated by ‘With Flood Risk’ and ‘Without Flood Risk’.
- Map identifying all site-specific submissions received in respect of Ballybofey/Stranorlar.

19.1 Housing and Core Strategy

Section 3 ‘Core Strategy’ of the Report sets out the recommended raised Core Strategy Housing Supply Target for Ballybofey/Stranorlar, which were prepared on foot of OPR Recommendation 3. This increases the Ballybofey/Stranorlar housing supply target to **681** units.

OPR Recommendation 3 then requires the Planning Authority to:

- (i) review and revise the core strategy and its determination of the area of land required to be zoned to accommodate primarily new residential development (New Residential (Phase 1)), by taking account in its detailed analysis and calculations of the potential housing yield of lands proposed to be zoned for a mixtures of residential and other uses, including:
- (a) Urban Core;
 - (b) Established Development;
 - (c) Opportunity Site; and
 - (d) Settlement Consolidation Sites.
- (ii) revise the land use zoning maps by reducing the area of New Residential (Phase 1) to reflect the revised core strategy and omit New Residential (Phase 2) lands for Buncrana, Ballybofey / Stranorlar and Bundoran.

To comply with this requirement the following analysis was undertaken:

- i.) A review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the ‘Urban Core’, ‘Established Development’ and brownfield Opportunity sites;
- ii.) Identification of vacant and derelict properties not captured in i).

A detailed breakdown of this analysis is provided in Appendix 19.2 at the end of this section of the report. The analysis identifies a potential yield from brownfield sites of the order of **85** units over the 6-year lifetime of the plan (2024-2030).

Thus, the portion of the housing supply target required to be met by, and associated housing land requirement for, greenfield lands (@ 35 unit per ha) for Ballybofey/Stranorlar may be summarised as follows:

Revised Housing Supply Target	681 Units
Minus potential yield from brownfield sites	-85 Units
Portion of Housing Supply Target required for greenfield lands.	596 Units

Housing land requirement for greenfield lands @ 35 units per Ha	17 Ha
Chief Executive's Recommendation 19.1:	
To adjust the Core Strategy table in line with the conclusions above, and to proceed to assess residential land supply options in this context.	
(This is considered to be a material alteration.)	

19.1.1 Housing land requirement Options Review

In accordance with the NPF, the Development Plan Guidelines and the Planning and Development Act 2000, the Planning Authority is effectively restricted to zoning a certain quantum of residential sites in compact, serviced, accessible locations based on the relevant Core Strategy housing supply targets and associated zoned housing land requirement for that settlement. Recommendation **19.1** above provides the portion of the housing target and associated housing land requirement required for greenfield lands is **596 units/17 hectares** based on a density of **35 units per hectare**.

In addition, to provide a degree of choice and avoid restricting supply through inactivity on particular landholdings, **Section 4.4.3** of the Development Plan Guidelines effectively facilitates an additional provision of residential lands over and above the Core Strategy target subject to, inter alia, a maximum of 20-25% of the required quantum of zoned land and the lands being serviceable and sequential. Given the significant undersupply/inactivity on existing residential zonings during the last decade and indications during public consultation that landowners are reluctant to release sites for development, it is therefore considered appropriate to also facilitate such **additional provision of 4.25 hectares** of zoned housing lands (**i.e. 25%**) over and above the nett Core Strategy housing land requirement set out above, **bringing the total housing land requirement to 21.26ha or 744 units** (at 35units per ha).

Furthermore, it a policy and objective of **Section 4.4.1** of the Development Plan Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. It is therefore also considered appropriate to retain serviced and developable land zoned for residential purposes which were previously identified in the County Development Plan, 2018-2024.

The recommendations that follow in relation to residential land supply have been made in the above-noted context.

19.1.2 Optimal Sites to Meet Housing land requirement (Plus 25%)

The **top-ranked sites (both New Residential Phase 1 and Opportunity Sites facilitating residential development) required to meet the Core Strategy plus 25% target (i.e. 21.26ha)** are identified in descending order of rank in the table below. In this regard only a certain percentage of individual Opportunity Sites were identified as being required to meet said Core Strategy Housing land requirement based on their specific characteristics namely: Opp Site 1: 30%, Opp Site 2: 50%, Opp Site 4: 40%, Opp Site 5: 60%. The table also notes where the OPR has recommended against zoning the site and, as appropriate, a rationale for not agreeing with the recommendation.

SITE	Potential Housing Yield	OPR REC. TO OMIT?	Chief Executive's Response To OPR Recommendation
NR 1.1	7	No	
NR 1.2	13	No	
NR 1.3	14	No	
NR 1.4	53	No	
NR 1.5	43	No	
NR 1.6	47	No	
Opp Site 4	14	No	
Opp Site 5	13	No	
Opp Site 2	190	No	
NR 1.7	135	Yes	NR 1.7 was ranked the 10 th most optimal site to meet the revised housing land requirement. In this regard the site is only a 10minute walk to Ballybofey town centre. Furthermore, whilst a pedestrian crossing may be needed to the opposite side of the road all other services (roads, footpaths, public lighting and surface drainage) are available to the site. It is also located between 2 existing residential estates.
NR 1.8	170	No	
NR 1.9	19	No	
Opp Site 1	185	No	

Notes:

- (i) 'NR' labels refer to site refs. in the Draft Plan;

Chief Executive's Recommendation 19.2:

To retain the sites identified in the table above as New Residential Phase 1 and Opportunity Sites.

(Note: This does not give rise to any material or non-material alteration.)

19.1.3 Serviced Sites Zoned in Seven Strategic Towns LAP 2018-2024

As noted above, Section 4.4.1 of the Development Plan Guidelines provides that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. Relevant sites in Ballybofey/Stranorlar are identified in the table below. The table also notes where the OPR has recommended (**Recommendation 6(i.) and (ii) refers**) against zoning the site and, as appropriate, a rationale for not agreeing with the recommendation.

SITE	OPR REC. TO OMIT?	Chief Executive's Response To OPR Recommendation
NR 1.10	No	Section 4.4.1 of the Development Plan Guidelines provides that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. All the sites are zoned either Primarily Residential or Opportunity Sites (which provide for residential development) in the current CDP2018-2024, are
NR 1.11	No	
NR 2.1	Yes	
NR 1.12	Yes	
NR 2.2	Yes	

		<p>serviceable and can be developed for housing during the life of the Plan. The recommendation below is made having regard to the aforementioned.</p> <p>Specifically, NR 1.11 and NR 1.12 are located in a sequential location 7min/8 min walk from Stranorlar Town Centre, are serviced by roads, public lighting, watermains and sewer, have been the subject of recent planning applications for residential development and are otherwise serviceable subject to the provision of additional sections of footpath on the Letterkenny Road.</p>
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Chief Executive's Recommendation 19.3:

Retain

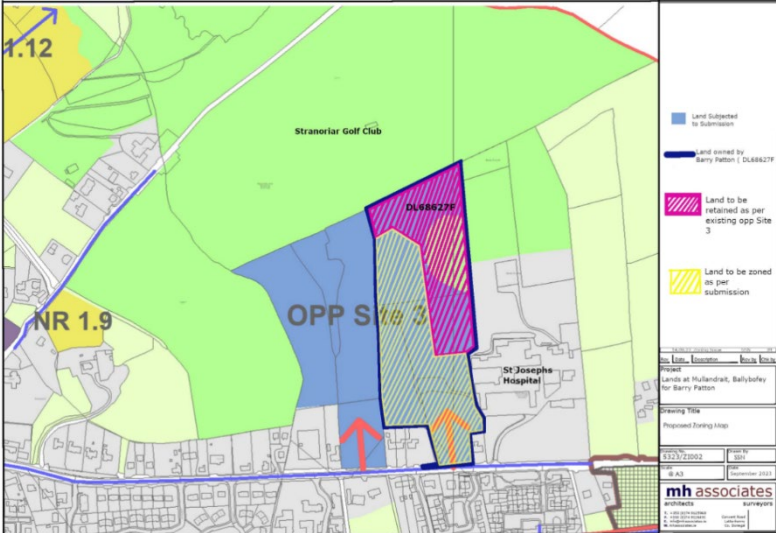
- NR 1.10, NR 1.11, and NR 1.12 as New Residential Phase 1 and
- NR 2.1 and NR 2.2 as New Residential Phase 2.

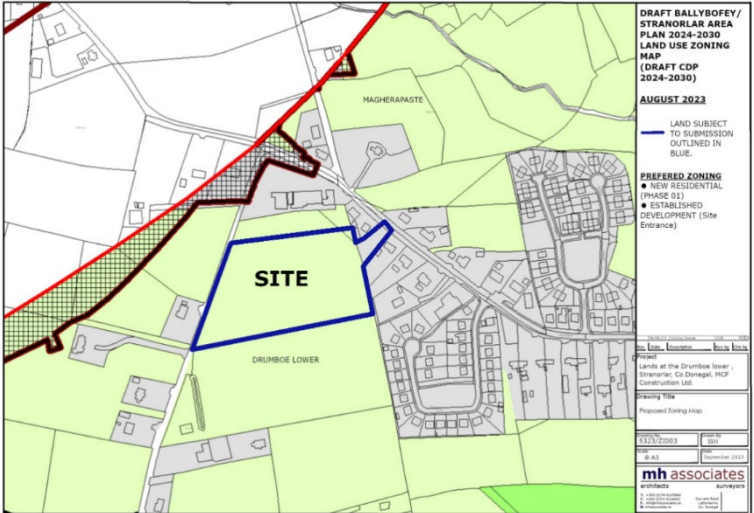
(See Map in Appendix 19.1)

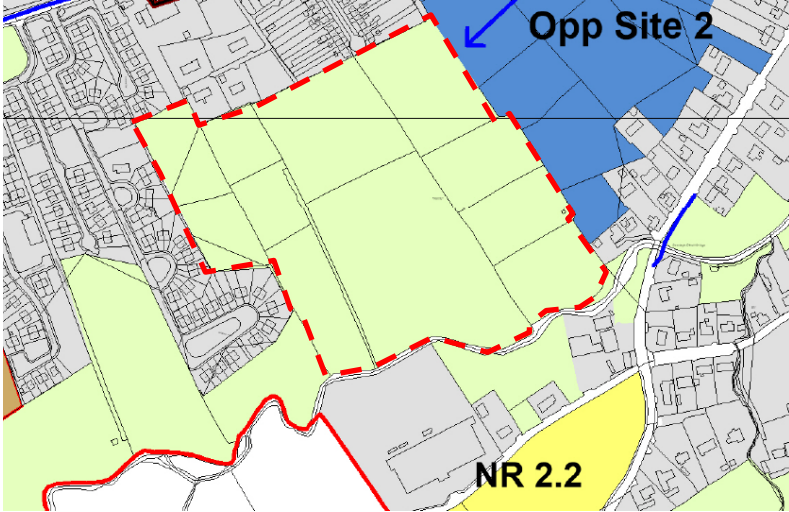
(Note: This does not give rise to any material or non-material alterations.)

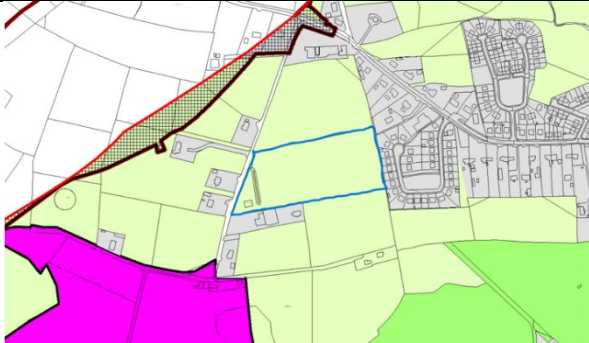
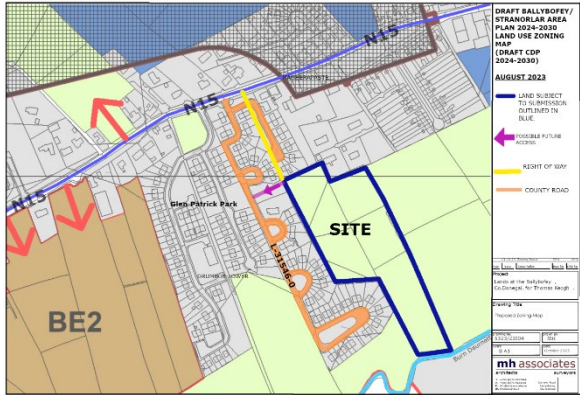
19.1.4 Recommendations Against Residential Zoning Arising from Other Submissions

Several sites are not recommended for residential zoning. These are identified in the map in Appendix 19.1 and in the table below, together with the submitted supporting rationale for the requested zoning. These sites are not supported based on: (i.) higher scoring alternative sites (the scoring matrix is attached as Appendix 19.3 at the end of this section of the report) identified to meet the Core Strategy requirement as referred to above; and (ii.) in some instances, site-specific issues – responses to these specific issues are also set out below where appropriate.

Submission Ref, Name, and Site Area	Rationale	Site Specific Issue and Chief Executive’s Response
<p>DCDP-31 Barry Patton, Mullindrait Stranorlar</p>	<p>This submission seeks the rezoning of part (yellow hatched area on map) of Opp. Site 3 to New Residential Phase 1 (see Map below). The submission states that public watermains, sewer, footpath and direct access to the N15 (within 60kph limit) are available and notes that inter alia that a mixed use developments including multiple residential development, shop, health centre, creche, petrol were previously granted on the site between 2006-2009. Contends that the proposal will continue to allow for the expansion of the Golf Club and St Joseph’s Hospital.</p> 	<p>Opp Site 3 was identified in the Seven Strategic Towns Local Area Plan 2018-2024 and the Draft Plan to facilitate the future expansion of St Joseph’s Hospital and the Ballybofey/Stranorlar Golf Club.</p> <p>It is <u>not</u> agreed that the subject lands be rezoned as ‘New Residential Phase 1’ based on:</p> <ul style="list-style-type: none"> • The availability of more centrally located sites to fulfil the Core Strategy housing land requirement and additional housing provision. <p>In addition, it is considered that Opp Site 3 should be rezoned as ‘Rural/Agricultural’ on the basis that:</p> <ul style="list-style-type: none"> • The HSE have confirmed in writing that it no longer requires Opp Site 3 for the future expansion of St Joseph Hospital. • It is otherwise not justifiable to zone the land <u>solely</u> for the expansion of the Ballybofey/Stranorlar Golf Club from a land use planning perspective within an urban plan area. However, the proposed rezoning to ‘Rural/Agricultural’ would still enable the Golf Club to acquire and utilise the lands for the Golf Course if it so wished. • It is otherwise not recommended to zone the site for residential purposes or any other urban use. <p>However, further to requests by the Golf Club and the HSE, it is considered that:</p> <ul style="list-style-type: none"> • A 10m buffer zone should be added to along the entirety of the existing Golf Course boundary to protect any future development on the adjoining lands in the land use zoning map. (Note: This is provided for in the Current Seven Strategic Towns Local Area Plan 2018-2024). • A policy should be inserted that any future development to the west of St Joseph’s Hospital provides adequate protections for the

Submission Ref, Name, and Site Area	Rationale	Site Specific Issue and Chief Executive’s Response
		residential amenities of the hospital including detailed landscaping/planting proposals as necessary.
<p>DCDP 87 MCF Construction Limited, Drumboe Stranorlar</p>	<p>This submission seeks the rezoning of lands currently zoned predominately as ‘Rural/Agricultural’ to New Residential Phase 1(see map extract below) noting that the site entrance is currently zoned ‘Established Development’.</p> 	<p>It is <u>not</u> agreed that this site be rezoned as New Residential Phase 1 based on:</p> <ul style="list-style-type: none"> • The peripherality of the site relative to more centrally located sites. • The associated greater walking distance (13minute approx.) to Stranorlar Town Centre than other more compact/centrally located sites. • The need for a 102m (approx.) footpath extension. <p>Note: This submission was assessed based on the site being accessed via a Gap Site on the L-2784-3 as proposed in the submission.</p>
<p>DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)</p>	<p>States that the land to the west of Opp Site 2 is a sustainable and suitable site for housing and seeks inclusion of same.</p>	<p>It is <u>not</u> agreed that these lands be rezoned for housing based on:</p> <ul style="list-style-type: none"> • The availability of more centrally located sites to fulfil the Core Strategy housing land requirement and additional housing provision. • The necessity for either 3rd party land acquisition to facilitate road access via the Ard McCarron estate or the prior development of/provision of road access through the adjoining Opp Site 2. • The non-sequential nature of this site in the absence of the development of Opp Site 2.

Submission Ref, Name, and Site Area	Rationale	Site Specific Issue and Chief Executive’s Response
	 <p>Approximate area referred to BASICC submission to the west of Opp Site 2 shown in map above.</p>	
<p>DCDP 132 Lorna Barron, Drumboe Lower</p>	<p>This submission seeks the rezoning of lands from ‘Rural/Agricultural’ to New Residential Phase 2 (See map Extract below). It contends the current zoning is restrictive and prohibitive, the site was a former football training grounds, is ideally suited for alternative development purposes, adjoins a multiple residential development which is serviced by footpath and public mains, is adjacent to Drumboe woods and ideally suited for Low Density residential development.</p>	<p>It is <u>not</u> agreed that these lands be rezoned as ‘New Residential Phase 2’ based on:</p> <ul style="list-style-type: none"> • Its peripheral location relative to more centrally located sites. • The associated greater walking distance (18 minute approx.) to Stranorlar Town Centre than other more compact/centrally located sites. • The need for a 363m sewer extension. • The need to widen the adjoining narrow local road. • The requirement for a 561m footpath extension. • The necessity for a 452m public lighting extension.

Submission Ref, Name, and Site Area	Rationale	Site Specific Issue and Chief Executive’s Response
		<p>Note: A watermain and sewer are available in the adjoining Multiple Residential Development. However, access to same are effectively blocked by the existing Cul-de-sac arrangement of said development. In addition, vehicular and footpath access to the site would need to be provided by the Local road to the west rather than the Drumboe Road.</p>
<p>DCDP-229 Thomas Keogh</p>	<p>This submission specifically requests the rezoning of a site to the east of the Sessiagh View Housing estate from 'Rural/Agricultural' to New Residential (Phase 1). It states that the site is serviced by roads (via the L-31546), public water mains, sewer, stormwater, street lighting, and wish to see social/affordable housing built on the land and said use would reflect the established use of the adjoining lands.</p> 	<p>It is <u>not</u> agreed that these lands be rezoned as 'New Residential Phase 1' based on:</p> <ul style="list-style-type: none"> • The availability of more centrally located sites to fulfil the Core Strategy housing land requirement and additional housing provision. • The associated greater walking distance (14 minute approx.) to Ballybofey Town Centre than other more compact/centrally located sites. • The absence of existing road access and the need to provide access through an existing open/green space for Glen Patrick Housing Estate (permitted under 99/2524) which would result in the loss of a substantial part of said open/green space. • The non-sequential nature of this site in the absence of the development of Opp Site 2. • The need for a footpath and public lighting extension of 37m (approx.) through said open/green space.

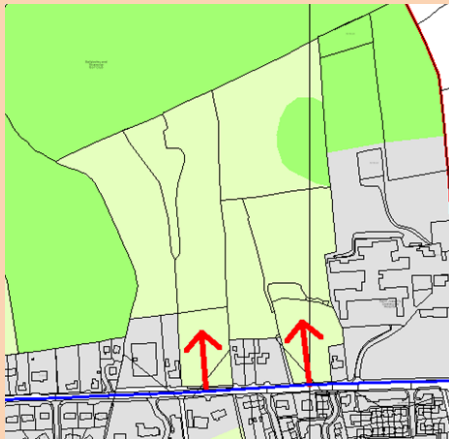
Chief Executive’s Recommendation 19.4.1

Not to zone the sites identified in the table above for Residential use.

(This does not give rise to any material or non-material alterations)

Chief Executive’s Recommendation 19.4.2

- Rezone Opp Site 3 as 'Rural/Agricultural' in the land use zoning map as shown below



- Delete Policy BS-OPP-P-3.
- Insert the following policy.

BS-RCNH-P-9	Ensure that any future development to the west of St Joseph’s Hospital provides adequate protections for the residential amenities of the hospital including detailed landscaping/planting proposals as necessary.
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- Insert a 10m buffer zone along the entirety of the boundary of the Ballybofey/ Stranorlar Golf Course in the land use zoning map and insert the following associated policy.

BS-RCNH-P-10	Not to permit any development within a 10m safety buffer of the boundary of the Ballybofey/Stranorlar Golf Club.
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(These are considered to be material alterations.)

19.1.5 Settlement Capacity Audit

OPR recommendation 9(i.) requires that the Authority to:

(i) provide a settlement capacity audit, as necessary, to establish the evidence-base and the status of all lands proposed to be zoned under the Plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, that is:

- (a) road and footpath access including public lighting;
- (b) foul sewer drainage;
- (c) surface water drainage;
- (d) water supply and/or additional service capacity;

including a written analysis to determine lands that are serviced (tier 1) and lands that are serviceable zoned land during the plan period (tier 2), including a costing estimate for the delivery of same;

The audit for all sites proposed to be zoned for residential purposes Ballybofey/Stranorlar is provided below. Note: This is a simplified version of a more detailed Settlement Capacity audit which was prepared in relation to all potential residential sites to facilitate the identification of proposed residential sites in the Draft CDP 2024. The more detailed audit was not inserted into the Ballybofey/Stranorlar Area Plan in the interests of keeping the plan as concise as possible.

Settlement Capacity Audit for Ballybofey/Stranorlar

Zoning Reference	Roads	Footpath	Public Lighting	Surface Water	Foul Sewer	Water Supply	Written Analysis Regarding Tier 1 & Tier 2.
NR 1.1	Y	Y	Y	Y	Y	Y	All services available. Tier 1
NR 1.2	Y	Y	Y	Y	Y	Y	All services available. Tier 1
NR 1.3	Y	Y	Y	Y	Y	Y	All services available. Tier 1
NR 1.4	Y	Y*	Y	Y	Y	Y	All services available. *Footpath required along site frontage. Tier 1
NR 1.5	Y	Y*	Y	Y	Y	Y	All services available to edge of site. *Footpath required along site frontage and on opposite side of Chapel Lane. Tier 1
NR 1.6	Y	Y	Y	Y	Y	Y	All services available. Tier 1
Opp Site 4	Y	Y	Y	Y	Y	Y	All services available. Tier 1
Opp Site 5	Y	Y*	Y	Y	Y	Y	All services available. *Footpath required along site frontage. Tier 1
Opp Site 2	Y	Y	Y	Y	Y	Y	All services available Tier 1

Zoning Reference	Roads	Footpath	Public Lighting	Surface Water	Foul Sewer	Water Supply	Written Analysis Regarding Tier 1 & Tier 2.
NR 1.7	Y	Y*	Y	Y	Y	Y	*Pedestrian crossing may be needed. All other services available. Tier 1
NR 1.8	Y	Y	Y	Y	N	N	50m watermain extension required. Sewer extension likely required from approximate location of adjoining health centre. All other services available. Tier 2
NR 1.9	Y	N	N	N	Y	Y	50m footpath and public lighting extension required. SW gullies required All other services available. Tier 2
Opp Site 1	Y	Y	Y	Y	Y	Y	All Services available. Tier 1
NR 1.10	Y	Y*	Y	Y	Y	Y	*Pedestrian crossing required. Otherwise, all services available. Tier 1
NR 1.11	Y	N	Y	N	Y	Y	Footpath available on opposite side of road. 154m sections of footpath required on same side of road. SW gullies required. All other services available. Tier 2
NR 2.1	Y	N	Y	N	Y	Y	67m footpath extension needed on lower Dunwiley Road. No SW gullies. All other services available. Tier 2
NR 1.12	Y	N	Y	N	Y	Y	Footpath available on opposite side of road. 380m sections of footpath extension required on same side of road. No SW gullies. All other services available. Tier 2
NR 2.2	Y	N	Y	Y	N	Y	90M footpath extension needed. 103m sewer extension needed. All other services available.

OPR Recommendation 9 (ii.) also requires the Authority to amend the land use zoning objectives for the town to ensure that lands that are neither serviced nor serviceable during the life of the Plan are not zoned for development. Members are advised that the recommendations above would provide for compliance with this requirement.

19.1.6 Other Housing Related Submissions

DCDP 137 Michael McGlinchey, Admيران**Submission Summary**

- Notes that the greatest area of concentration for New Residential Development is focused on the townland of Admيران and notes there is the possibility of a significant number of new homes on sites NR 1.11 and NR 1.12.
- Notes there is no footpath on this side of the road, no cycle lane, no bus stop and no traffic calming on the N13 Letterkenny Road.
- Expresses concern at the increase in housing units for Ballybofey/Stranorlar from 12 per ha in the 2018-2024 plan to 35 per ha in the Draft CDP 2024.
- Makes the following specific submission to improve the Area Plan.
 - Footpath from McClays Corner to 60kmh sign and welcomes the identification of same in the plan.
 - Cycle lane from McClays Corner to 60kmh sign.
 - Traffic Calming measures on the N13 to a standard equivalent to the N15.
 - Designed bus stop on the N13.
 - A Playground to serve existing development and Sites NR 1.8, NR 1.11 and NR 1.12 noting that Open Space within
 - A lower density of residential units outside of Urban Areas noting that the proposed housing density is 35 per ha is too high.

Chief Executive Response

NR 1.11 and NR 1.12 were previously zoned in the Seven Strategic Towns Local Area Plan 2018-2024 and Section 4.4.1 of the Development Plan Guidelines requires that all existing serviceable and developable sites should be retained.

Whilst it is noted that sections of footpath would have to be provided to facilitate residential development on the NR 1.11 and NR 1.12 they are otherwise serviced by existing watermains and sewer, are a 7min and 8min walk from Stranorlar Town Centre and a 13min and 14min walk from St Mary's primary schools respectively. They are otherwise developable in terms of National Road Access policy, topography, physical arrangement, flooding, environmental amenities, and built/archaeological heritage.

Otherwise, the Transport Mobility Strategy support the provision of active travel infrastructure (which may include both a footpath and cyclepath) on the Letterkenny Road.

Point 7 of Table 19 Transport/Sustainable Mobility Strategy for Ballybofey/Stranorlar already prioritises the need for active travel infrastructure including providing new sections of footpath on the Letterkenny Road. However, it is not always possible to specify the exact active travel measures which might be provided at certain locations in the plan and in this regard and there is no existing project/funding for such facilities at this location. However, any new active travel facilities at this location may include a pedestrian crossing which would also serve as traffic calming and this area is included in a list severance of active travel facilities in urban areas forwarded to the TII. Consequently, it is considered that the abovementioned existing general references to active travel facilities at this location are considered appropriate.

In relation to the identification of lands for a playground, the Council has recently purchased the Martyrs field in Drumboe for recreational purposes, this will be priority site for the development additional recreational amenities in the Twins towns, and there are therefore no plans to acquire further lands for play areas in this area.

In relation to housing density, Ballybofey/Stranorlar is the 3rd largest urban area in the County is identified as a County Growth Driver in the Core Strategy of the Draft CDP and it is reasonable to classify Sites NR 1.8, NR 1.11 and NR 1.12 as outer suburban/Greenfield sites. The Sustainable Residential Development in Urban Areas (DoEHLG 2009) supports the provision of residential net

densities of 35-50 dwellings per ha on outer suburban greenfield sites in larger towns and villages. Furthermore, the application of this gross density to determine the quantity of zoned land required for Ballybofey/Stranorlar is supported in Section 2.3 of the OPR submission. Consequently, the application of a density of 35 dwellings per ha for Ballybofey is acceptable and indeed at the minimum point of said density range.

19.1.7 Recommendation from the Council's Executive.

Issue Identified

The Draft Ballybofey/Stranorlar Area plan boundary contains a significant quantum of land zoned 'Rural/Agricultural' zoning which lies outside the built up urban footprint of the twin towns, which is not required to be zoned for any other purpose (e.g. business/enterprise, residential etc) and which essentially constitutes part of the rural area.

Chief Executive Response

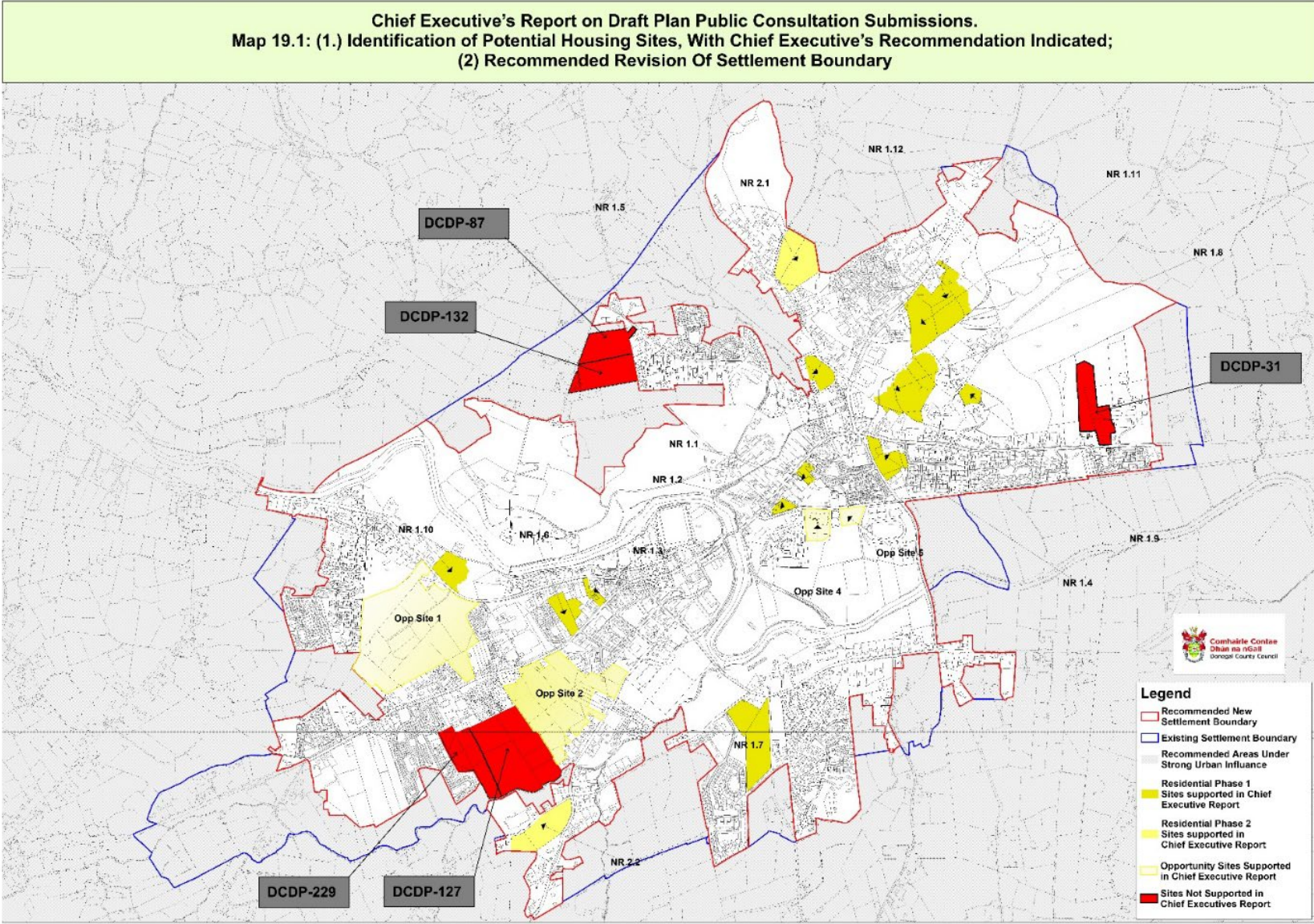
Based on the above it is considered that the Ballybofey/Stranorlar Area Plan Boundary be amended to exclude peripheral 'Rural/Agricultural' Zonings lying outside the built up urban footprint of the twin towns.

Chief Executive's Recommendation 19.5:

Amend the Ballybofey/Stranorlar Area Plan Boundary to exclude peripheral 'Rural/Agricultural' Zonings as detailed in the map in Appendix 19.1 and copied overleaf.

(This is considered to be a material alteration.)

Appendix 19.1 Map Showing Residential Sites Recommended, Residential Sites Not Recommended, and Proposed Amended Plan Boundary



19.2 Economic Development and Employment

Economic Development and Employment Issues Raised in Submissions

DCDP 211 Office of the Planning Regulator

Section 5 Economic Development and Employment states that site BE 1 to the southwest of Ballybofey/Stranorlar conflicts with Objective ED-O-2 and states that it is not appropriately located as it is in a peripheral location which does not have regard to the sequential approach and is inconsistent with achieving compact growth. It also notes that site is poorly serviced.

The associated **OPR Recommendation 6** requires the PA to omit Site BE 1

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Questions the rationale for Site BE 1 and states that they would like to see these uses closer to the town (e.g. beside Opp Site 2).

Chief Executive Response

It is agreed that site BE 1 is in a peripheral, non-sequential/compact and car dependent and poorly serviced location and should therefore be omitted and rezoned as 'Rural/Agricultural'.

Chief Executive's Recommendation 19.6:

Rezone 'Business Enterprise' zoning BE 1 as 'Rural/Agricultural'.

(This is considered to be a material alteration.)

19.3 Transportation/Sustainable Mobility

Transport/Sustainable Mobility Issues Raised in Submissions

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Seeks the identification of a linkage providing for the improvement/extension of the footpath from Dreenan to the existing Tennis Courts and Ballybofey Utd Soccer Pitch.

Seeks clarification on the strategy for future vehicular connectivity between from Donegal Road to Glenfinn Road in light of the recent acquisition of Dr Mulrine's House.

States that Opp Site 5 is identified as an overflow park in the Transport and Mobility Strategy but also identified as a Development Site on Page 338 for multiple residential, sports/recreational or community facilities' and seeks clarification regarding same.

DCDP 211 Office of the Planning Regulator

Section 6 Sustainable Transport and Accessibility of the OPR Submission welcomes the identification of key transportation improvement projects and sustainable mobility priorities for Buncrana, Ballybofey/Stranorlar and Bundoran. However, the associated **OPR Recommendation No. 6** requires the inclusion of individual modal share targets for these towns over current baseline levels.

However, it states that the draft plan still retains a strong focus on road based activities such as relief roads in Ballybofey/Stranorlar and state this approach is at odds with current transport policy, the Climate Action Plan and under the National Investment Framework for Transport in Ireland 2021 and climate targets and states it will be necessary for the Planning Authority to reconsider same.

The associated **OPR Recommendation No. 15** requires the PA to omit the proposed relief roads and bypasses for inter alia *Ballybofey/Stranorlar* unless they can be justified having regard to current national transport and climate action policy context on an appropriate evidence basis.

DCDP 239 National Transport Authority (NTA)

Notes the plan contains several roads proposals including the *Ballybofey Link Road*, and requests that the inclusion of roads projects is re-examined in this context of National Transport Policy including enabling a switch to sustainable modes with active travel and public transport at the top of modal hierarchy.

Notes BS-T-O-3, to prepare a Local Transport Plan for Ballybofey/Stranorlar, and states that whilst it is best practice to prepare a LTP alongside a LAP, it welcomes that a LTP will be prepared during the lifetime of the plan.

DCDP 278 St Columba's College, Stranorlar

The students of St Columba's College, Stranorlar participated in a presentation and feedback session on the Draft CDP including a group-based feedback exercise which asked the students "What should the plan do to encourage Walking Cycling and Public Transport in Ballybofey/Stranorlar?" to which the students provided feedback on a map of the Twin towns. Collectively this feedback generally emphasised the need to provide for the following additional active travel/public transport infrastructure:

- A link between the Glenfinn Road and the Donegal Road
- A link between the Old Railway track and Glenfinn Road.
- A link between Stranorlar Main Street and St Columba's College.
- A link between Ashling Court and Blue Cedars.
- East west links from the Millbrae, across the flood plain and onward toward Ballybofey Town Centre to the south of Railway Road.
- A bridge from Ballybofey Town Centre to Drumboe Woods.
- A link between Lawnsdale and the Beeches.
- A link between Lawnsdale and the local road to Sessiagh O Neill.
- Riverside walks.
- A link/cyclepath along the old railway line towards Glenfinn.
- A link along the old railway line towards Castlefinn
- A train service to Castlefinn.
- Footpaths in the southern rural hinterland of Ballybofey.
- A Link between the Trusk Road and Donegal Road.
- Footpath and cyclepaths along the N15 to the West of Ballybofey.
- A direct Link between the Beeches estate and the Finn Valley Centre.
- A footpath along the N13 Letterkenny Road.
- Public transport along the main N15/N13 axis
- A link along the Golf Course Road.
- Cycleways and walkways along the key arterial routes into Ballybofey/Stranorlar.

Chief Executive's Response

In relation to the issue of re-examining the *Ballybofey Link Road* in light of national transport policy cited in the NTA submission and the OPR Recommendation 15 to omit *Relief Roads* unless they can be justified having regard to national transport/climate policy, it is assumed that this refers to the Western Link Road Project.

In this regard Sustainable mobility is a key priority for the Ballybofey/Stranorlar Area Plan and the plan identifies and support a range of projects/measures designed to reduce travel demand, promote active travel and facilitate a modal shift to more active travel modes. These include: locating new residential zonings at compact accessible locations within walking distance of services, active travel improvements such as shared footpath/cyclepaths on Millbrae, new pedestrian/cycling infrastructure over the Burn Darnett at Sessiagh, footpath completions on the Dunlwey Road and Letterkenny Road and pedestrian improvements on Glenfinn Street.

In particular pedestrian improvements on Glenfinn Street are inherently dependent on the provision of a new multi modal link at between Glenfinn Road and Donegal Road which will: reduce/remove vehicular traffic at said highly congested town centre location, enable the reallocation of road space to pedestrian and cyclists, enhance the liveability/viability of residential and commercial units on the street (which currently has high levels of vacancy and dereliction) and alleviate traffic congestion by providing a more suitable alternative vehicular link.

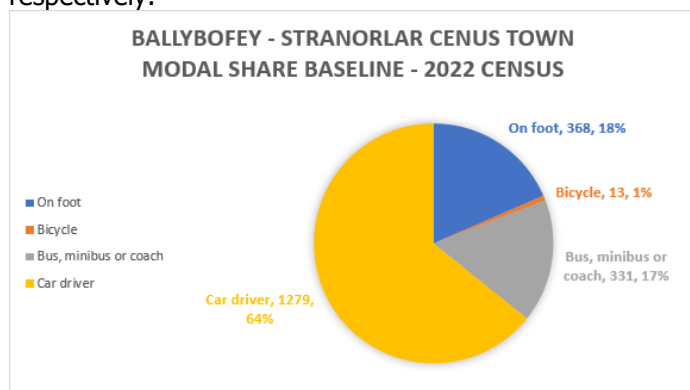
As such the implementation of the Western Link Road project is critical for the promotion of active and sustainable travel, urban regeneration, as well as improving traffic flow and easing traffic congestion and provision for same should be retained in the Draft Plan. Please also refer to the Chief Executive Response to this issue in the Transport Section of this report.

In relation to request for clarity regarding the provision of said Link Road in BASICC's submission. The associated Transport/Sustainable Mobility Map highlights the route of the existing Part VIII approval for a link to the east of the Mulrines manufacturing facility. However, an Options selection process is still currently underway to identify the most optimal solution for this issue. In this regard a number of options for a link are being examined and this selection process will also take into account the most up to date situation with regard to land ownership/land acquisition.

The Dr Mulrine's house site on Donegal Road and the adjoining lands to the north are zoned as NR 1.3 in the Draft Plan. It is considered that this site represents a significant opportunity not only to provide town centre housing but also offer future potential to deliver a transport link between the Donegal Road and the Glenfinn Road. Consequently, it is considered that:

- A transport link should be shown extending through the site from the Donegal Road to the Glenfinn Road, through NR 1.3 in the land use zoning map and the Transport/Sustainable Mobility Map.
- Policy BS-H-P-2 b. should be amended to require or facilitate a vehicular link through this site if the site is selected as the preferred link between Donegal Road and Glenfinn Road (in addition to the existing requirements for a pedestrian and cycling permeability links).
- Point 18 of Table 19.4 should be amended as detailed in said Recommendation below.

In relation to the **provision of individual modal share targets** for Ballybofey/Stranorlar the current baseline data for the twin towns indicates that pedestrian and bus transport modes enjoy a healthy share of the overall transport modes utilised in the Twin Towns at 18% and 17% respectively.



An increase in this modal share by active/sustainable travel modes will not only require the implementation of the transport/sustainable mobility projects detailed in the plan but also additional local public transport services and other measures to encourage sustainable mobility. The Local Transport Plan (provided for in BS-T-O-3 of the plan) is the most appropriate mechanism to carry out adequate evidence-based research into this issue and to identify the extent of such services and any additional measures necessary to increase modal share. As such it is considered premature to indicate a modal share target for Ballybofey/Stranorlar prior to the preparation of said detailed transport plan.

The provision of **improved facilities for pedestrians and other road users on Judge's Road/L-2964** would have benefits in terms of enhanced pedestrian safety and connectivity towards local sporting amenities such as the **Tennis Courts and Ballybofey Utd Soccer Pitch**. However, as Judge's Road/L-2964 is narrow with numerous 3rd party residential frontages it is not possible to specify at the plan stage what specific improvements may be feasible along same. Nevertheless, in view of said benefits it is agreed that a specific point should be added to Table 19.1 Transport/Sustainability Mobility Strategy and a link along said road should be added to both the Transport/Sustainable Mobility Map and the Land Use Zoning Map, regarding same. See Recommendation 19.4.4 below.

Point 24 in the Transport/Sustainable Mobility map is intended to identify a general, rather than definitive, location for the future provision of additional/overflow parking to cater for events at the Finn Valley Centre. In this regard Policy BS-OPP-P-5 is flexible in whether Opp Site 5 can deliver residential development, sports/recreational or community facilities (which includes Overflow parking for the Finn Valley Centre) on said site.

In relation the submission from the **students of St Columba's College, Stranorlar** it is important to state that facilitating a significant increase in sustainable mobility through enhanced active travel infrastructure and public transport services is a key objective of the all the area Plans contained within the CDP 2024 (GEN-T-O-1 refers). However financial resources are a constraining factor for any plan, and it is therefore important to prioritise those projects which have the greatest need. Consequently, it is not possible to prioritise some of more ambitious proposals detailed above in the Area Plan (e.g. links the in the wider hinterland of Ballybofey/Stranorlar).

Other proposals (e.g. links between Stranorlar Main Street and St Columba's College, Aishling Court and Blue Cedars, Lawnsdale and the local road to Sessiagh O'Neill) would unfortunately be constrained by the physical layout of existing development in said areas.

However, it is important to point out that The Transport/Sustainable Mobility Strategy in the Area Plan (Table 19.3 and associated map refers) provides for a wide range of additional active travel infrastructure for Ballybofey/Stranorlar including:

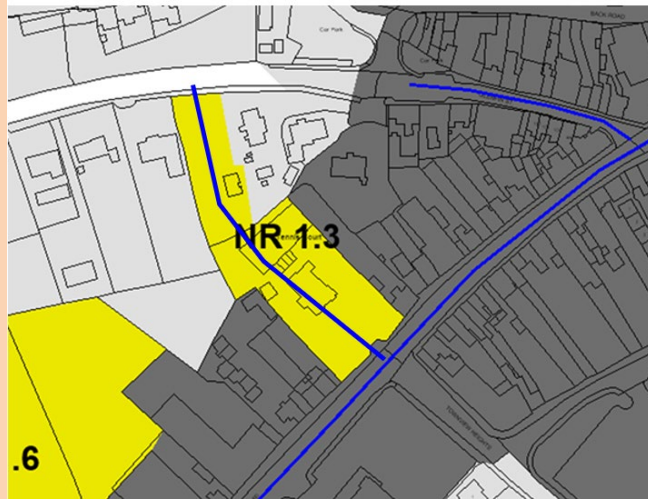
- Active Travel Infrastructure along the N13 Letterkenny Road (Point 7 refers).
- Active travel infrastructure/greenways along the old railway lines toward Castlefinn, Donegal Town and Glenfinn, which would also provide connectivity between the Lawnsdale and Beeches Estates and between said estates and Stranorlar Town Centre (Points 10, 11 and associated Map refers).
- Improved links along the Navenney Road and Millbrae (Point 12 refers).
- A link between the Glenfinn Road and the Old Railway Line to Glenfinn (See Map)
- A bridge from Ballybofey Town Centre to Drumboe Woods (Point 14 refers).
- A footpath extension along the Golf Course Road (Point 16 refers).
- General active travel improvements along the N15 axis (Point 17 refers).
- A link between the Glenfinn Road and Donegal Road (Point 18 refers).
- A developer led link between the Trusk Road and the Donegal Road (Point 20 refers).

Otherwise:

- Policy BS RCNH-P-4 supports the provision of riverside walks.
- Policy BS-T-O-3 provides for the preparation of a detailed Local Transport Plan for Ballybofey/Stranorlar which it is considered be the appropriate mechanism to analyse the need for specific local transport services.
- Policy T-P-8 of the plan protects historic railway corridors for strategic infrastructure provision and Objective T-O-7 of the plan seeks to secure the provision of a rail link between Letterkenny and Sligo.

Chief Executive’s Recommendation 19.7.1

Insert a transport link from the Glenfinn Road to the Donegal Road through NR 1.3 in both the land use zoning map and the Transport/Sustainable Mobility Map as shown below.



Amend Policy BS-H-P-2 b. as follows (new text in blue)

- a. Ensure that any residential development of NR 1.3 provides for: high quality, safe, attractive direct and continuous pedestrian and cycling permeability links between the Glenfinn Road and the Donegal Road; **and otherwise require, or facilitate the provision of, a vehicular link through the site between said roads if the site is selected as the preferred link between Donegal Road and Glenfinn Road.**

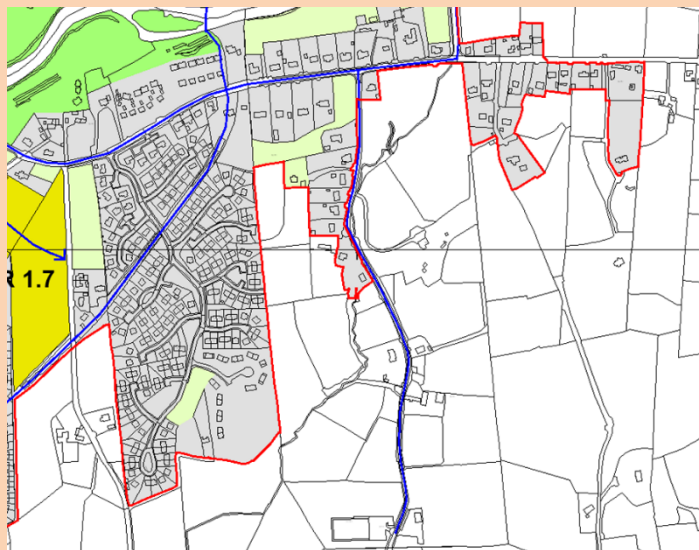
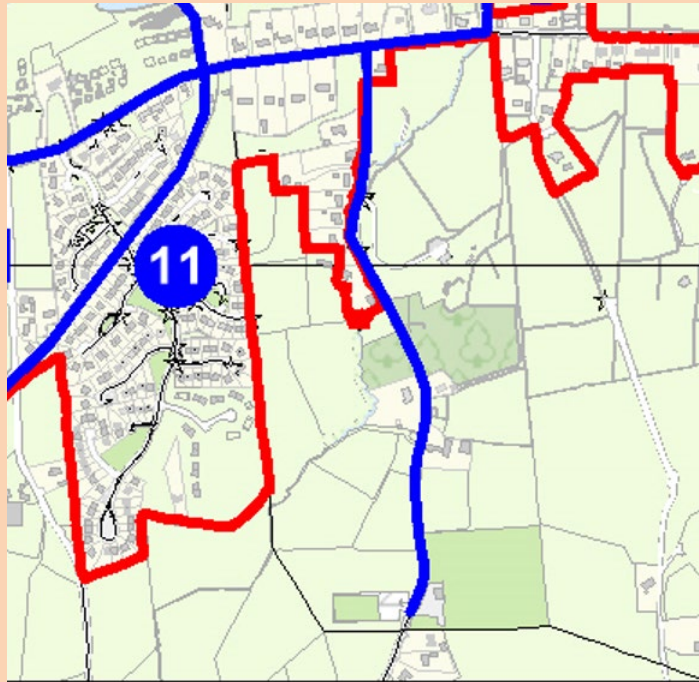
Amend Point 18 of Table 19.3 Transport/Sustainable Mobility Strategy for Ballybofey/Stranorlar as detailed below. (existing text in black; new text in blue; text to be deleted in strikethrough)

<p>18. Glenfinn Street And Donegal Road</p>	<ul style="list-style-type: none"> • Pedestrian improvements on Glenfinn Street. • New enabling link between Glenfinn Street and Donegal Road <p>Note: The existing approved Mulrine’s link has been mapped however An Options Selection Process to identify the most optimal solution is currently in progress. In any event both the approved link alongside the Mulrine’s Factory and the Dr Mulrine’s House site/adjoining lands represent key opportunities to create said link and have been mapped.</p>	<ul style="list-style-type: none"> • Enhanced/safer pedestrian and cycling connectivity between Glenfinn road area and the town centre. • Improved overall connectivity between the Glenfinn Road and Donegal Road areas.
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(These are considered to be material alterations.)

Chief Executive’s Recommendation 19.7.2

Amend the Transport Sustainable Mobility Map and the land use zoning map as detailed below to illustrate the provision of improved facilities on Judge’s Road/L-2964.



(This is considered to be non-material).

19.4 Flooding

Flooding Issues Raised in Submissions

DCDP 211 Office of the Planning Regulator

Section 8 Flood Risk Management concludes that as flood zones have not been overlaid on land use zoning maps it is difficult to conclude that the PA has taken adequate account of flood risk and requests the PA do same.

States that land use zonings for undeveloped lands which have not satisfied all criteria of the plan making justification test in Flood Zone A should be zoned for water compatible use and in Flood Zone B should be zoned water compatible or substituted for an appropriate land use.

The associated **OPR Recommendation 16** request the PA to:

- Review NR 2.2, NR 1.8, NR 1.10 and NR 1.12, Opp Site 4, Opp Site 5 and BE 2.
- Overlay the flood zone maps with the land use zoning maps.

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Notes that Site NR2.2 (At Sessiagh View) appears to have some flood risk constraints.

Chief Executive Response

Please also see Section 8 of this Report with regarding to other flooding issues raised by the OPR.

It is agreed that the High End Future Scenario (HEFS) Flood Zone A and B layers should be added to the Ballybofey/Stranorlar land use zoning map (See Section 8 of this report).

The SFRA for the Draft CDP 2024 contained a justification test which examined all zonings within areas of elevated flood risk in Ballybofey/Stranorlar. Said justification test found that, except for a portion of BE 2 (BS-BE-002), all other zonings passed the justification test.

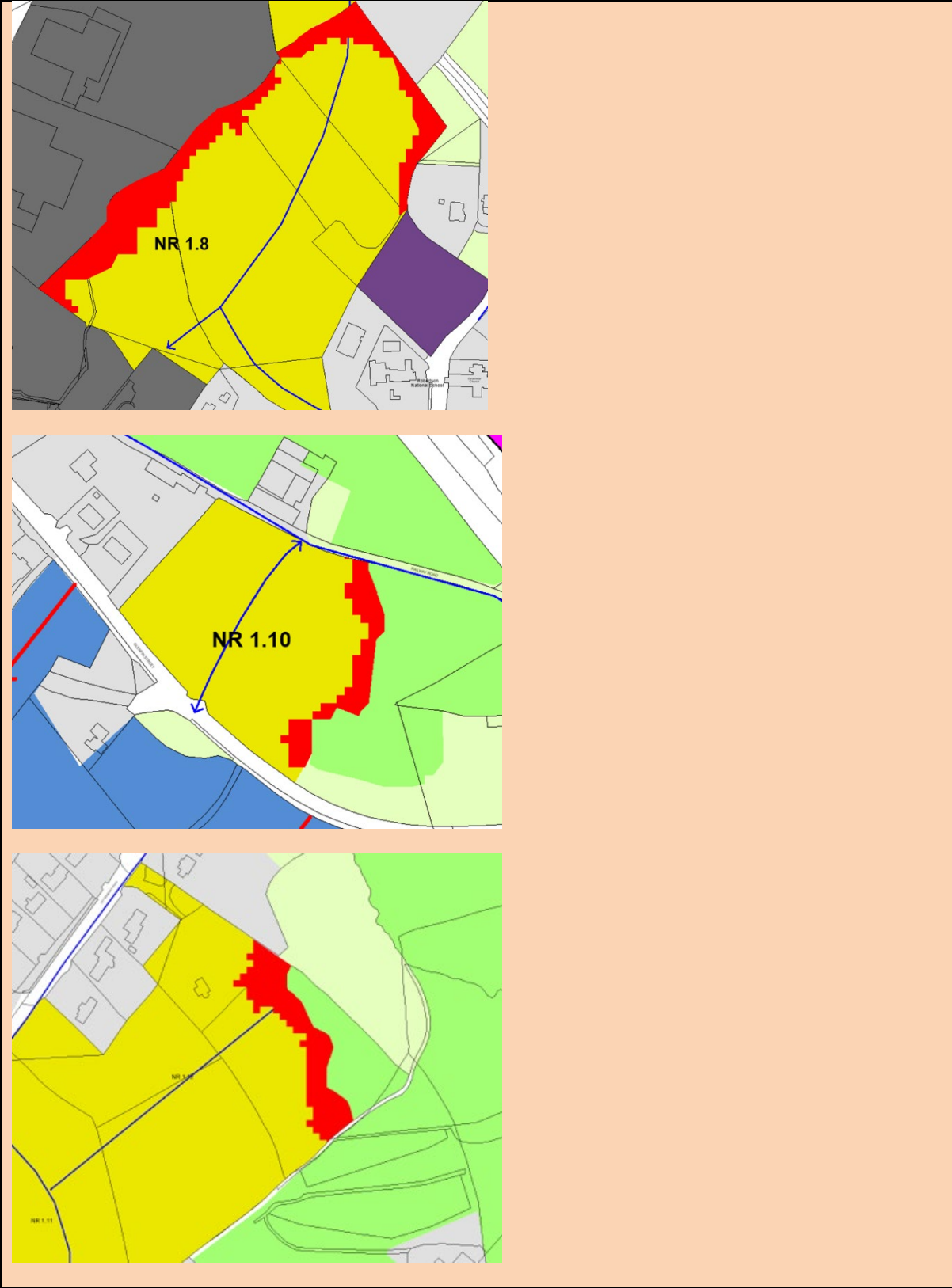
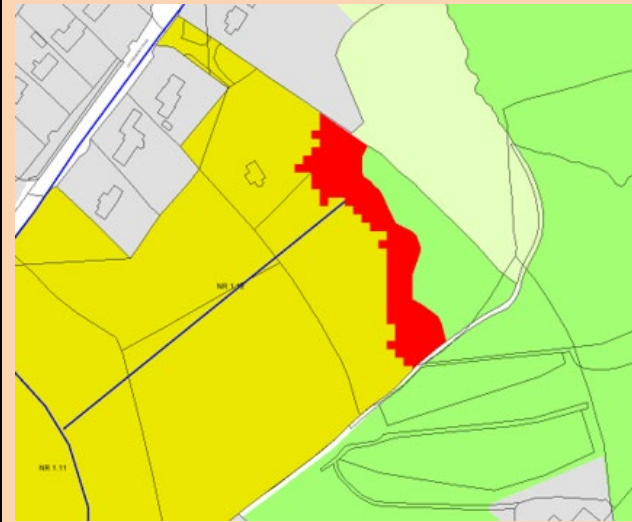
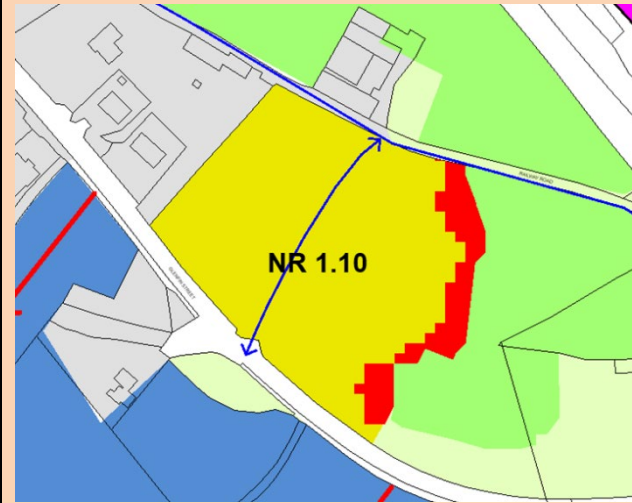
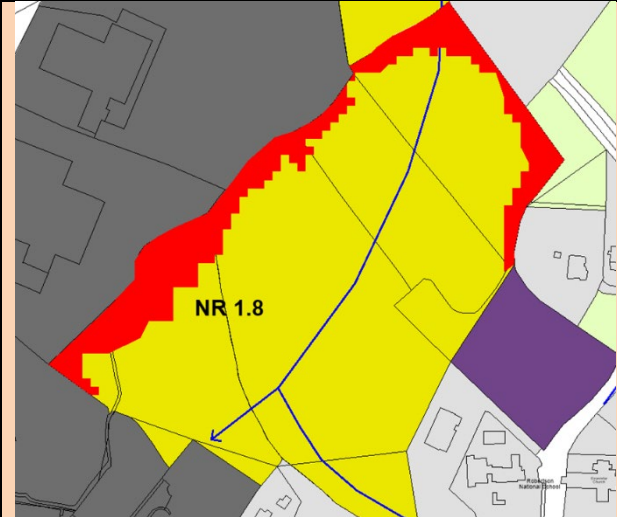
NR 2.2, NR 1.8, NR 1.10 and NR 1.12, Opp Site 4, Opp Site 5 and BE 2. were reviewed in the context of the High End Future Scenario (HEFS) Flood Zones A and B. NR 1.8 was additionally reviewed. In this regard:

- **NR 2.2:** A portion of said sites lies within the HEFS Flood Zone A and B. This issue was previously dealt within via Policy BS-H-P-1(g) which requires the provision of a detailed site-specific flood risk assessment and does not otherwise facilitate any residential development within areas identified as High End Future Scenario Flood Zone A and B.
- which requires a Site Specific Flood Risk assessment, precludes residential development in said portions of the site and ensures development does not exacerbate flood risk elsewhere.
- **NR 1.11:** None of the site lies within the HEFS Flood Zone A and B.
- **NR 1.10:** A very small portion of the eastern periphery of the site is located within the HEFS Flood Zone B and it is proposed to rezone said portion Open Space and Recreation.
- **NR 1.12:** A small portion on the eastern periphery of the site is within the HEFS Flood Zone B and it is proposed to rezone said portion Open Space and Recreation.
- **Opp Site 4:** Practically all of the site lies outside the HEFS Flood Zone A and B.
- **Opp Site 5:** All of the site lies outside the HEFS Flood Zone A and B
- **BE 2:** Practically all of the site lies outside the HEFS Flood Zone A.
- **NR 1.8:** A small portion of the north western and north eastern periphery of the site lies within either Flood Zone A and B. It is proposed to rezone said portions Open Space and Recreation.

Chief Executive's Recommendation 19.8:

- Rezone the small portions of site NR 1.8, NR 1.10 and NR 1.11 marked in red on the map below as Open Space and Recreation.

(This is considered to be non-material.)



19.5 Urban Regeneration and Town Centre

Urban Regeneration and Town Centre Issues Raised in Submissions

DCDP-67 Office of the Planning Regulator

Section 2.6 Urban Regeneration notes the requirement in the Planning Act for objectives for the renewal of areas in need of regeneration, welcomes the appointment of a town Centre First and Vacant Homes Officers, and the regeneration policies and objectives in the plan.

However, the OPR:

- Expresses concern that the accommodation of retail uses within Opportunity Sites within Ballybofey/Stranorlar will further undermine the 'Urban Core' and request clear and sufficient safeguards for the development of Opp Site 1 and 2.
- Queries the extent of the 'Urban Core', states it encompasses sites which are not town centre in character, and this risks the commercial becoming very diluted in character and incapable of building up an economy of scale.
- Acknowledges that a Regeneration Strategy and Action plan has been endorsed by the Council, but whilst given effect by BS-TC-O-3 this is non statutory plan, and is not appended to the plan. Opines this does not meet the required standard for public consultation under the act, the implications of the action plan for the town are not evidence from the published draft plan and this similarly arises for the Drumboe Castle and Environs Masterplan Area. States the PA should consider how to resolve same including omitting policies and objectives giving effect to such documents or including these documents as appendices.

The associated **OPR Recommendation 10** requires the PA to:

- (i) Set out a clear strategy to tackle the high level of derelict and/or vacant buildings in Ballybofey Stranorlar including:
 - a) Focused positive objectives and policies to encourage, facilitate and support the bring back into the use and the regeneration of vacant and/or derelict buildings, though the identification of all relevant areas in need of regeneration.
 - b) Active land measures to be provided by the planning authority to facilitate the and support the regeneration of vacant and/or derelict buildings including identifying the necessary supporting infrastructure and public realm works to be delivered by the PA including funding references.
 - c) Enforcement measures and mechanism to be employed by the PA to encourage landowners not to leave their premises vacant become derelict.
 - d) Targets for the reduction in the number of Vacant and/or derelict buildings.
 - e) Monitoring proposals.
- (ii) Consider reducing the 'Urban Core' land use zoning objective to more clearly support town centre type development within the intended core commercial retail/services area or introduce some type of mechanism to provide a focused approach to town centre type development.

The associated **OPR Recommendation 11** requires the PA to: set out clear and sufficient safeguard for Opp Site 1 and Opp Site 2, to ensure that their development will not further undermine the town centre / 'Urban Core', having regard to the functions of the town centre / 'Urban Core'.

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Welcomes objectives and policies which seek to ensure that the viability and vitality of the twin towns is strengthened and protected. Confirms their support for objectives and policies which support the growth of the town, tackle vacancy and dereliction and direct appropriate town centre uses within the 'Urban Core'. Further states that a vibrant and viable 'Urban Core' can only be achieved if a more controlled/managed town centre is achieved and criticises the related Policy ED-P-5 (home based business in rural areas).

Welcomes the references to, and inclusion of, various Regeneration Strategy and Action Plan projects in the Draft Plan and states this will support future funding or private led development of same.

Supports the identified of than 'Urban Core' but questions whether the Base, the Twin Towns, Childcare Facility and Ard McCool Play Park should be included in the 'Urban Core' Boundary.

Chief Executive Response

In relation to **Opp Sites 1 and 2** it is noted that the twins town lacks a significant supply of bulky non convenience retail provision, the existing town centre is generally unsuitable for bulky retail in view of its tight urban grain, traffic congestion and lack of brown field site in non flood risk locations. Given these specific local conditions it is considered justifiable that bulky retail is Open to Consideration within Opp Sites 1 and 2 as detailed in Section 19.4 Zoning Matrix of plan. Otherwise, all other forms of retail development would be subject to the retail sequential test, wherein the town centre, is the preferred location or new retail development. Furthermore, there is no explicit provision for retail development in any of the Opportunity Site specific policies. Accordingly, it is considered that, Opp Site 1 and 2 provide for uses which are either unsuitable (e.g. light engineering, warehousing) and/or cannot be readily accommodated (e.g. bulky retailing) within the 'Urban Core'. and would therefore not undermine the functions of, the town centre/'Urban Core'. Notwithstanding the above it is considered that the bullet points detailed in Recommendation 19.3 below are added to Policies BS-OPP—P1 and 2 to ensure clarity in this regard and further protect the functionality/vibrancy of the town centre.

The OPR's comment in relation to the **extent of the 'Urban Core'** is noted. The town centre of Ballybofey/Stranorlar has always displayed an elongated and dispersed character with retail units, restaurants, offices etc occurring at various points along the N15. In addition, the 'Urban Core' of Ballybofey/Stranorlar has long contained a significant number of residential units and such units are considered an integral part of its town centre environment and essential in promoting urban living. However, in view of the overall need to build a consolidated, identifiable and vibrant town centres for Ballybofey and Stranorlar and the need to concentrate in the first instance on the reuse/refurbishment of existing town centre residential and commercial stock it is agreed that the extent of the 'Urban Core' should be reviewed in the plan. Said review has identified some areas that fundamentally do not display a town centre character or are not part of the long standing fabric of the town centre and should therefore be rezoned from 'Urban Core' to 'Established Development'. The proposed revised 'Urban Core' zoning is detailed in Recommendation 19.3 below. In this regard BASICC's proposal that the Base, the Twin Towns Childcare Facility and Ard McCool Play Park should be included in the 'Urban Core' Boundary is not agreed with.

BASICC's support for the objectives and policies to support the growth of the town and tackle **vacancy and dereliction** is noted and welcomed. The Area Plan highlights a wide range of Urban Regeneration issues including vacancy and dereliction. Policy TC-G-P-1 in Chapter 17 (which applies to all area plans) *'positively facilitates sensitive proposals for the refurbishment and reuse of vacant and derelict building including proposals for the amalgamation and extension of existing properties'*. The SEED Project aims to deliver 3 key urban regeneration interventions including a civic space, reuse/extension of the vacant Ritz Cinema as flexible enterprise space, and a enhanced pedestrian link and is fully supported by BS-TC-O-2 of the plan. In relation to the control/management of the town centre Note 13 of the Zoning Matrix requires that professional services which provide services principally to the visiting public will be directed to defined 'Urban Core'.

BASICC's support for, the plan's provisions related to the **Regeneration Strategy and Action Plan** are noted and acknowledged. Said document was prepared in advance of the area plan following public and stakeholder consultation and identifies several key urban regeneration interventions (e.g. refurbishment of vacant housing units at the Diner Buildings). However, said interventions are still conceptual in nature, will require further detailed feasibility studies, detailed design refinement and further public consultation. Consequently BS-TC- O-3 BS-TC-P-1 correctly

seeks to implement/facilitate projects which would achieve/accord with the placemaking objectives and principles set out the action plan without being definitive what such proposals should be. The Drumboe Woods and Environs Feasibility Study was prepared following public consultation specifically proposes entrance gates and enhanced connection to the woods within the town centre. Any such proposal would also be subject to detailed design refinements, and further public consultation.

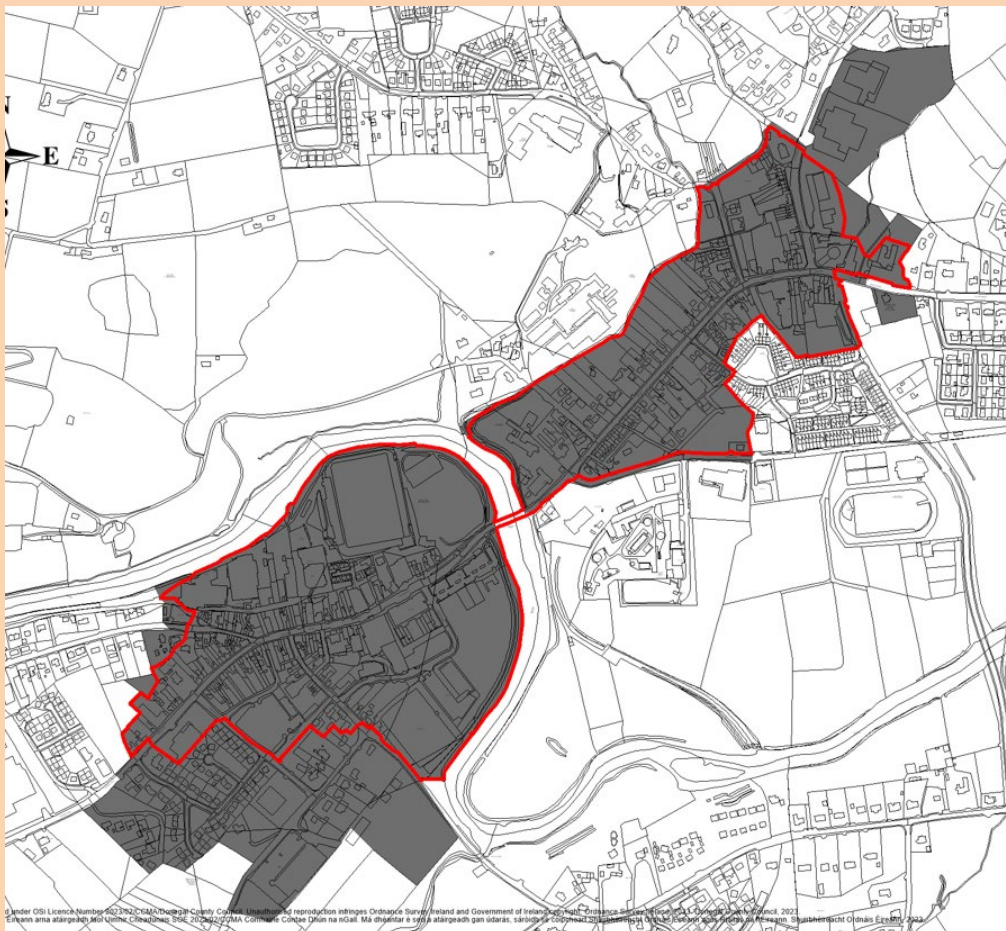
In addition, Point 10, Section 1.7 of the Development Plan Guidelines emphasis that the plan should be 'as concise as possible'. Consequently, as said Regeneration Strategy and Drumboe Woods Study are 48 and 84 pages respectively it is considered that said studies should not be physically appended to the Plan but hyperlinks to said studies should be added (See Recommendation 19.3 below).

Notwithstanding the above **in response to OPR Recommendation 10 the PA has prepared a detailed Vacancy and Dereliction Strategy which is proposed to be inserted into Chapter 5 (See Recommendation 5.1 of this Report).**

Chief Executive's Recommendation 19.8:

- Reduce the 'Urban Core' zoning the land use map to the area defined by the red line as shown in the map below and zone the remainder as 'Established Development'

(This is considered to be a material alteration).



- Insert the following Bullet Point in Policy BS-OPP-P-1:
 - Do not prejudice the achievement of TS-TC-O-1 to sustain and enhance the town centre's role as the retail, hospitality, tourism and cultural hub of the Finn Valley.

(This is considered to be non-material.)

- Insert the following Bullet Point in Policy BS-OPP-P-2
 - Do not prejudice the achievement of TS-TC-O-1 to sustain and enhance the town centre's role as the retail, hospitality, tourism and cultural hub of the Finn Valley.

(This is considered to be non-material.)

- Insert hyperlinks to the Ballybofey/Stranorlar Regeneration and Action Plan.

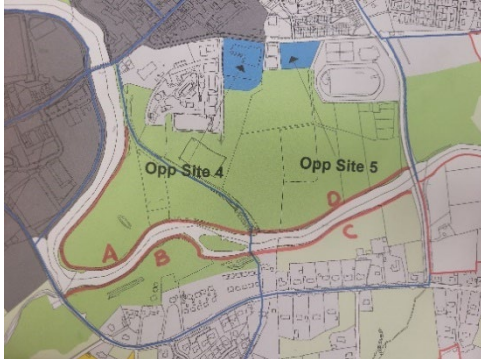
(This is considered to be material.)

19.6 Recreation, Community and Heritage

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Submission Summary

- Supports the strength of Draft Policy BS-RCNH-P-2 which seeks to facilitate development proposal in the Drumboe Castle and Environs Masterplan area and supports inclusion of associated planning criteria.
- Seeks the zoning of the Urban Park (i.e. the Pentland Park Concept specifically for recreation and Open space, notes the potential of same, states that BASICC wish to explore the viability of the park through future funding schemes and supports BS-RCNH-P-3 in this regard.
- Seeks additional Recreational Paths along the river banks marked in dark red and refers to a map of showing such paths (See below).



- Seeks the identification of a linkage providing for the improvement/extension of the footpath from Dreenan to the existing Tennis Courts and Ballybofey Utd Soccer Pitch.
- Requests that new Training Pitches at Cappry and MacCumhails should be clearly marked on the map and zoned for such use.
- States that site NR1.12 would benefit from a footpath/recreational link and along the northern edge and this may be developed as a walkway route to, from and around Lough Allan.

Chief Executive Response

On the basis that the provision of a **centrally located urban public park** on the disused site to the east of the Ballybofey Shopping arcade is already positively supported in Policy BS-RCNH-P-3 and is also part of the long-standing fabric of the town centre it is not considered necessary/appropriate to re zone same as 'Open Space and Recreation'.

The Transport/Sustainable Mobility Map identifies future project/links which can facilitate future transport interventions in Ballybofey/Stranorlar. Separately it is considered that **Riverside Recreational walks** have the potential to enhance the quality of life and support healthy living in the twin towns. In this regard it is noted that the Natura Impact Report of the Draft CDP 2024 found that the policy to provide Riverside Walks BS-RCNH-P-4 was *in compliance with Article 6 of the Habitats Directive which requires that any developments associated with this policy will not result in adverse effects on European sites*. It is also considered that the provision of a recreational links between the N15 and NR 1.12 and Lough Alaán, and around said lake, would

have significant quality of life benefits and provide a useful recreational amenity. Consequently, it is considered that:

- RCNH-P-4 be amended to refer to the walks identified in the Ballybofey/Stranorlar Regeneration Strategy and Action Plan and to support lakeside as well as riverside recreational walks.
- Policy BS-H-P-2 be amended to provide a requirement for the provision of a future link from NR 1.12 to Lough Alaán
- The landuse zoning map be amended to show indicative riverside walks along the River Finn and along Lough Alaán and a future link from NR1.12 to Lough Alaán and from the N15 to Lough Alaán.

The training pitch at Cappy lies outside the plan boundary. On the basis that **MacCumhail's training pitch** is part of the long-standing fabric of the town centre it is not considered necessary/appropriate to re zone same as 'Open Space and Recreation'.

Chief Executive's Recommendation 19.9

Amend Policy BS-RCNH-4 as follows: (existing text in black; new text in blue)

Support and facilitate the development of high quality, age and disabled friendly and environmentally sensitive riverside recreational/lakeside walks (including those identified within the Ballybofey/Stranorlar Regeneration Strategy and Action Plan) which maximise the retention of existing environmental features subject to the requirements of the EU Habitats Directive.

(This is considered to be non material.)

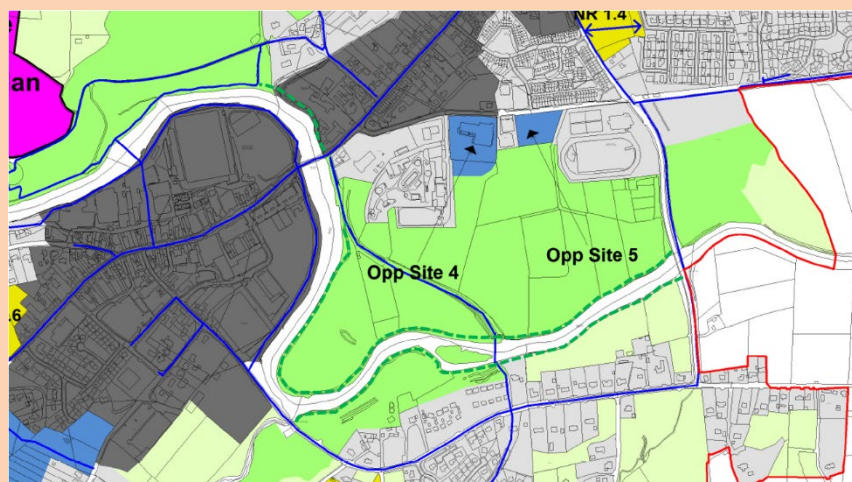
Amend BS-H-P-12 as follows: (existing text in black; new text in blue; text to be deleted in strikethrough)

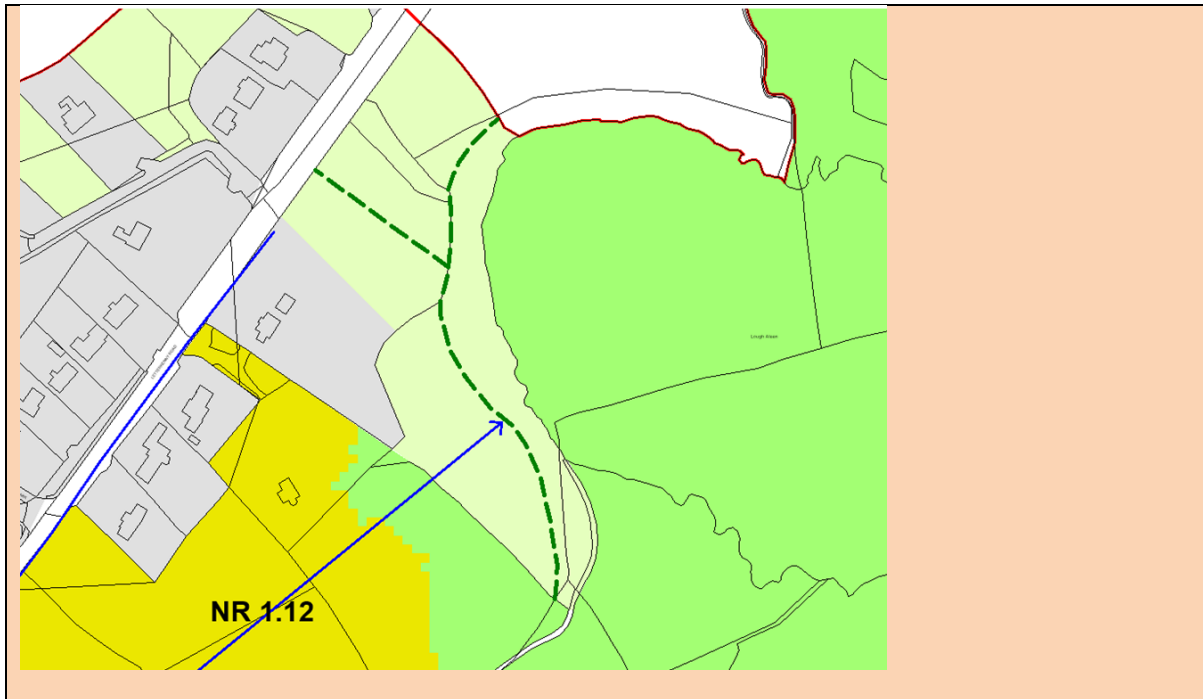
- Ensure that the development of sites NR 1.8, NR 1.11, NR1.12 and provides:
 - Provides high quality, safe, attractive direct and continuous pedestrian and cycling permeability links to ~~both~~ the N13/Letterkenny Road, ~~and~~ the local road leading to Ballybofey/Stranorlar Golf Club and Lough Alaán.

(This is considered to be non-material).

Amend the land use zoning map as detailed below to show indicative routes for Riverside/Lake Side Walks (marked in dark green) and a future link from NR1.12 to Lough Alaán and from the N13 to Lough Alaán (as detailed below)

(This is considered to be non-material).





DCDP 264 Department of Education

Submission Summary

This submission Specifically notes that draft plan projects a population increase for Ballybofey/Stranorlar to 6409 by 2030, and there are currently 3 mainstream primary schools and 2 post primary schools in the Twin Towns. It states that at primary and secondary level there is a potential increased requirement for school places of a level that could be met by the expansion of existing facilities.

Chief Executive Response

The above comment that potential increased requirements for schools placed could be met by the expansion of existing facilities is specifically noted. In this regard in recent years new schools have been constructed for St Mary's school and Finn Valley College and a new extension of St Columba's College was permitted under 22/50598. Furthermore, engagement with local primary and secondary schools as part of the preparation of the Draft Plan indicate that, save for the additional lands zoned in the Draft Plan for the expansion of Robertson National School, no additional lands are otherwise required for the expansion of existing education facilities in the twin towns.

19.7 Opportunity Sites

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Submission Summary

Seeks the requirement for the provision of an Outline Masterplan Strategy for the Proposed Opportunity Sites and New Residential Sites, to avoid piecemeal development, facilitate connectivity and permeability between adjoining developments and demonstrate how each individual land parcel ties into an outline strategy.

Chief Executive Response

The request regarding the provision of an Outline Masterplan Strategy for Opportunity Sites and New Residential sites is noted. An indicative masterplan for Opp. Site 1 is included in the plan.

Furthermore BS-H-P-1 and the linkages shown within/between New Residential sites in the land use zoning map already require the provision of direct and continuous pedestrian and cycling permeability between said sites and adjoining lands. However practical difficulties arise if an individual applicant/developer is required to provide a master plan for other areas of a residential or opportunity site which they do not have ownership or control over, and previous planning experience indicates that such developer led masterplans are therefore highly speculative. As such it is considered that the existing site-specific requirements in the plan to ensure appropriate permeability/connectivity within new residential sites and to adjoining lands are sufficient.

DCDP 148 Transport Infrastructure Ireland

Submission Summary

Section 6.1 of the submission welcomes the support for the TEN-T PRIPD in the Area Plan. It notes that; the plan is accompanied by a Land Use Zoning Map which indicates the TEN-T Corridor, said corridor overlies Opp Site 1, and highlights the protections of the associated BS-OPP-P-1 vis-à-vis the TEN-T link road. It welcomes the safeguards provided by the TEN-T but in the interests of clarity recommends that any Multimodal access should be appropriately plan led and where national roads are impacted include consultation with the TII and be in accordance with the provisions of the DoECLG Spatial Planning and National Road Guidelines.

Chief Executive Response

- The TII support for the TEN-T PRIPD specific safeguards and provisions in the Area plan are noted and acknowledged.
- It is agreed that the proposed 'multimodal access' across and to Opp Site 1 should be plan led and where national roads are impacted should include consultation with TII and be in accordance with said guidelines.
- Accordingly, it is considered that Policy BS-OPP-P-1 should be amended as set in the recommendation below.

Chief Executive's Recommendation 19.10:

Amend bullet point 1 of BS-OPP-P-1 as follows: (existing text in black; **new text in blue**; ~~text to be deleted in strikethrough~~)

- Do not prejudice the delivery, strategic functionality, road safety, and carrying capacity of, the Section 1 TEN-T PRIPD link road. In this regard any multimodal access enabling permeability across and to this Opp Site 1 shall be: **plan led**, via a single strategic access point **onto said link road**, ~~the location and design of which shall be subject to the~~ **located and designed in** strict agreement of Donegal County Council **and in consultation with TII and also be in accordance the *Spatial Planning and National Roads Guidelines* (DoECLG 2012) where national roads are impacted.**

(This is considered to be non material.)

19.8 Miscellaneous Issues

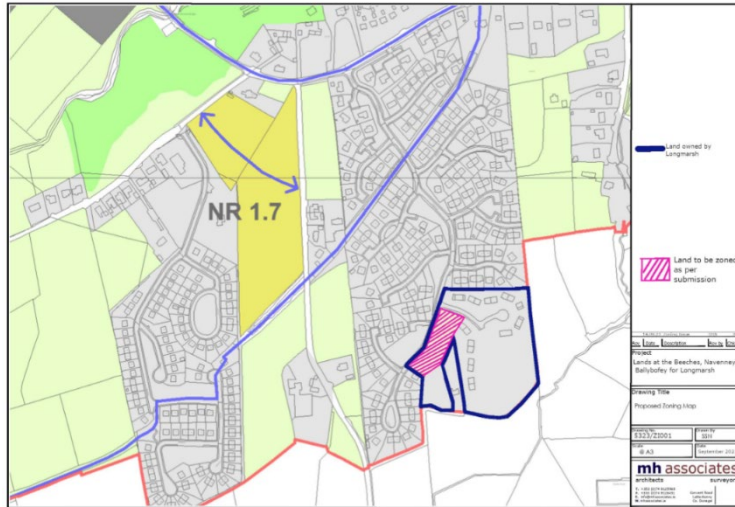
DCDP-32 Longmarsh Developments Ltd, The Beeches, Navenney, Ballybofey

Submission Summary

This submission seeks the rezoning of lands currently zoned as 'Rural/Agricultural' to 'Established Development'/Residential Phase 1. It notes that public water mains, sewer, stormwater, street lighting, service and road footpath are available. It also highlights the following planning history on the overall site:

- 99/2722 Permission 130 Dwellings – Granted

- 03/8310 Permission 71 Dwellings – Granted
- 07/60737 Permission Childcare Facility – Granted
- 09/60176 Extension of Duration for 03/8310 – Granted
- 12/50460 Extension of Duration for 03/8310 – Granted
- 18/51989 Completion of 7 Partially completed dwellings – Granted



Chief Executive Response

This site consists of a small infill area within the southern part of the Beeches residential estate. It was identified as an area of open space in the site layout plan for 03/8310. However, said Open space was ancillary in nature, was never developed as an open space and there is an existing area of useable, passively supervised and maintained area open space directly adjoining the site. The Beeches estate has a low overall development density which would not be significantly impacted by any residential development on the subject site. The site is serviced by watermains and sewers within the Beeches Estate and is approximately a 15min walk or a 4min cycle from the Ballybofey Town Centre. The site does not lie within Flood Zone A or B and there are no natural/built heritage designations or features on the site. There has been an acute shortage of new residential construction in Ballybofey/Stranorlar in recent years.

Consequently, it is considered that the site constitutes a serviced, developable, brownfield infill site within an area of Established Residential Development and therefore **it is agreed that the site should be rezoned as 'Established Development'** which would allow the consideration of infill residential development.

Chief Executive's Recommendation 19.11:

Rezone the subject area from 'Rural/Agricultural' to 'Established Development'.

(This is considered to be a material alteration.)

DCDP 127 Ballybofey and Stranorlar Integrated Community Company CLG (BASICC)

Submission Summary

Requests that the Baseline map be updated to include the footprint of all current buildings, for example St Mary's School.

Seeks the reduction of the settlement boundary so that it terminates at Aishling Court.

Suggests that lands located to the east of Lawnsdale be considered for housing as an extension to this existing residential community.

Queries whether NR1.1 should also include the nearby Former Fire Station building.

Questions whether the vacant Greenfield site opposite the Mart Building on Railway Road should be specifically identified for town centre housing.

Chief Executive Response

The request that the baseline map be updated to include all existing buildings is noted. However, the PA is reliant on the mapping supplied by Ordnance Survey Ireland/Tailte Éireann in this regard, which may not show certain buildings.

On the basis that, it is otherwise recommended to omit Site BE 1, it is National Strategic Outcome of the National Planning Framework to achieve compact growth it is considered that the Plan Boundary should be reduced to the west of Aishling Court (see recommendation in relation to overall Plan Boundary reduction below).

The lands to the east of Lawnsdale are already zoned for residential development as site NR 1.7 in the Draft Plan.

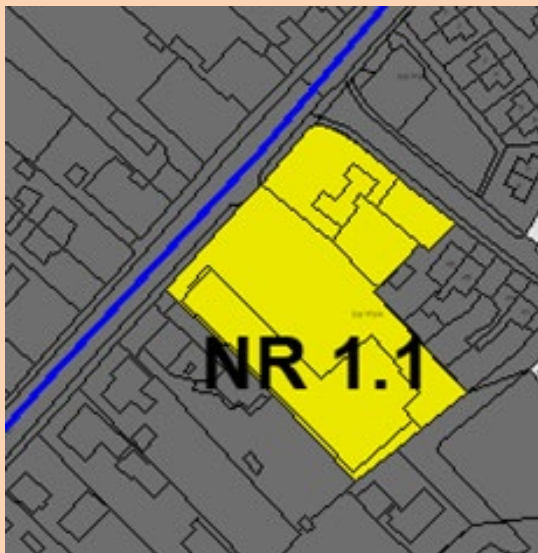
NR 1.1 was identified to facilitate the regeneration/refurbishment of the empty residential units on the Diner site as identified in the Regeneration Strategy and Action Plan. However on the basis that the site of the adjoining Old Fire Station Building is proposed as a Social Housing development it is considered that NR 1.1 should be extended to also encompass said building.

The infill vacant site opposite the Mart Building on Railway Road is identified as 'Urban Core' within the land use Zoning map in Draft CDP (and the revised 'Urban Core' as proposed within this CE Report) and would therefore be Open to Consideration in principle for new housing provision.

Chief Executive's Recommendation 19.12:

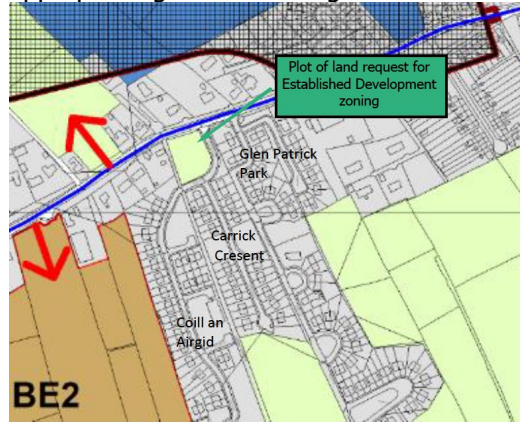
Increase the extent of residential site NR 1.1 to include the lands shown in yellow on the map below.

(This is considered to be a material alteration.)



DCDP 228 Dermot Gildea, Donegal Road, Ballybofey**Submission Summary**

This submission specifically requests the rezoning of this small site at Donegal Road Ballybofey from 'Rural/Agricultural' to 'Established Development' and opines that the proposed zoning is not appropriate given its strategic location and the supporting services.

**Chief Executive Response**

This small flat infill site is located within an area of Established Residential development including the Carrick Crescent, and Coill an Airgid housing estates and adjoining one-off residential dwellings along the N15 Donegal Road. As such the site can essentially be considered an ancillary part of said 'Established Development'. It is also noted that the site is well serviced by the adjoining N15, footpaths, a 100m watermain on the adjoining estate road and a 225mm sewer and is 13min walk and 4min cycle from Ballybofey Town Centre, is not within Flood Zone A or B and there are no natural/built heritage designations or features on the site. A planning search also indicates that the subject site was not permitted as an open/green area for any of the adjoining multiple residential developments.

Consequently, it is considered that the site constitutes a serviced, developable, infill site within an area of Established Residential Development and therefore it is agreed that the site should be rezoned as 'Established Development' which would allow the consideration of infill residential development.

Chief Executive's Recommendation 19.13:

Rezone the subject lands from 'Rural/Agricultural' to 'Established Development'.

(This is considered to be a material alteration.)

DCDP 138 Uisce Eireann**Submission Summary**

This submission specifically notes that both NR 1.2 and Opp. Site 4 are in close proximity to the Ballybofey/Stranorlar WWTP and that Policy WW-P-10(b) shall apply.

In addition, Section 2 Additional Comments and Suggestions of the submission notes that Transport and Utilities Infrastructure is referenced as a zoning on Table 17.1 but does not form part of the zoning tables in 18.1, 19.1 and 20.1.

CE Response

WW-P-10(b) inter alia requires a setback of 100m between any existing wastewater treatment facilities and sensitive development (e.g. residential development). In this regard it is noted the existing facilities at the BS WWTP are approximately 92m and 57m from NR 1.2 and Opp Site 4

respectively. Achieving compliance with said policy on NR 1.2 would only require a minimal setback of any residential development from the southern boundary of said site. Achieving compliance with said policy on Opp Site 4 would require any residential to be located within the Northern and Eastern parts of the site. To ensure compliance with this policy, protect future residential amenity in said sites and in the interests of clarify it is recommended that BS-H-P-2 and BS-OPP-P-4 be amended as below.

The reason the Transport and Utilities Infrastructure Zoning does not form part of the Zoning Matrix in Table 19.1 is that there is no such zoning within the Ballybofey/Stranorlar Land Use Zoning map. In this regard the TEN-T PRIPD project has its own specific zonings on said map. Nevertheless, in the interests of clarity it is considered appropriate to insert a row for water services infrastructure into the Zoning Matrix in Table 19.1 as recommended below.

Chief Executive’s Recommendation 19.14:

Amend policies BS-H-P-2 and BS-OPP-P-4 as detailed below (new text in blue)

BS-H-P-2	h) Ensure that any residential development on Site NR1.2 is setback at minimum of 100m from the Ballybofey/Stranorlar Wastewater Treatment Plant.
BS-OPP-P-4	a) Facilitate proposals for the re-development of the existing mart site including multiple residential development or business/enterprise (including light engineering/manufacturing, logistics/warehousing, service-based enterprises but excluding bulky retail) on Opportunity Site 4. b) Ensure that any residential development on Opp Site 4 is setback at minimum of 100m from the Ballybofey/Stranorlar Wastewater Treatment Plant.

(This is considered to be a material alteration.)

Insert the following row and associated footnote into Table 19.1 – Land Use Zoning Matrix for Ballybofey/Stranorlar

Land Use	‘ Urban Core’	New Residential (Phase 1)	New Residential (Phase 2)	‘ Established Development’	Opportunity Site	Business/Enterprise	Community Infrastructure	Open Space and Recreation	‘ Rural/Agricultural’
Water/Wastewater Services	0	0	0	0	0	0	0	0 ²¹	0

Footnote 21:

Proposals for large scale water services infrastructure on lands zoned Open Space and Recreation (e.g. municipal wastewater/water treatment plant infrastructure, sewage pumping stations etc.) will not normally be acceptable within said zoning. Development applications for small scale water services infrastructure (e.g. individual wastewater treatment systems, watermains and sewers) will be open to consideration within said zoning if not otherwise exempted development. All development proposals will be subject to the requirements of the Flood Risk Management guidelines.

(This is considered to be a material alteration.)

DCDP-152 Lance Feaver**Submission Summary**

States that the Area Plans do not appear to have industrial and business activity zonings and specific objectives and policies these uses should be separated out (e.g. Business Zone, General Industrial Zone and Heavy Industrial Zone) and there is also a shortfall in industrial zoning.

States that there does not appear to be enough land zoned New Residential to account for land bank and to achieve targets. It also opines serviceable pockets within 'Urban Core' areas should be zoned residential and a Future Urban Zone should be included. It also considers that a Lower Density Residential Zone and more defined Residential Zoning types should be provided.

Seeks more defined residential zoning types in allow intensification of within particular areas of a town and points to examples in New Zealand.

In relation to the Ballybofey/Stranorlar zoning matrix queries:

- Queries why Hot Food Takeaways is not a Y in the 'Urban Core'.
- Questions the use of the term Not Acceptable in the Legend.
- Queries why Tourism Developments only have a 'Y' within the 'Urban Core'.
- States that that more flexibility should be provided for Creches Playschools and School Education and this should be an 'O' in every zone save Industrial.

Chief Executive Response

The Draft Ballybofey/Stranorlar Area Plan identifies several sites for business/enterprises uses including industrial uses (e.g. Opp Sites 1,2, 4 and 5 and BE 2), which, even with the recommended omission of site BE 1, amounts to 40.47ha. However, consultations with both stakeholders and the Council's Economic Development Unit at both Pre-Draft and Draft stage do not indicate a strong preference for any one type of business/enterprise use, or indeed any demand for heavy industrial uses, and thus the flexibility provided in said zonings to facilitate a range of business enterprise uses is considered appropriate.

This CE Report proposes that the housing supply target be increase to 681 unit and the related greenfield housing land requirement be increased to 21ha based on Recommendations 2 and 3 of the OPR submission. The area plan therefore provides a significant quantum of residential zonings both within the 'Urban Core' and on greenfield sites at serviceable, compact and sequential locations and it is therefore considered that a future urban zone is currently not required.

The application of a gross density of 35 units per ha to determine the quantity of zoned land required for Ballybofey/Stranorlar is supported in Section 2.3 of the OPR submission of the Draft Plan. Otherwise, the residential density appropriate to a particular site will be assessed at a project level having regard to the relevant to Departmental Density Guidelines. In this regard in larger towns and villages such as Ballybofey/Stranorlar the current *Sustainable Residential Development in Urban Areas* (DoEHLG 2009) supports the provision of residential net densities of 35-50 dwellings per ha on outer suburban greenfield sites and generally higher densities in city or town centres.

Regarding the zoning matrix.

- Hot Food Takeaways, whilst providing an important hospitality functionality nevertheless may have impacts on adjoining residential amenities in terms of noise, smells, parking etc. The criteria for the assessment of Take Aways in the 'Urban Core' is assessed in the associated TC-G-P-4. Consequently it is considered appropriate that they remain 'O' rather than 'Y' for 'Urban Core' in the zoning matrix.
- The purpose of the zoning matrix/land use zoning map is locate specific development types in appropriate locations. As such where certain uses are not suitable it is considered appropriate to clearly indicate same with a 'N'.

- Creches/Playschools are Open to Consideration in a wide range of land uses including New Residential Phase 1, 'Established Development', Opportunity Sites and Community Infrastructure which provide a wide range of locational flexibility in appropriate locations.
- Schools/Education are also Acceptable or Open to Consideration in a wide range of land uses including 'Urban Core', 'Established Development', Opportunity sites, and Community Infrastructure.

DCDP 237 Maureen McNulty

Submission Summary

This submission specifically requests that land in the Stranorlar townland that is subject to flooding is and designated Special Area of Conservation, should be removed in line with existing EU, Government and Council policies.

Chief Executive Response

The Ballybofey/Stranorlar Area Plan has been formulated in full cognisance of High End Future Scenario Flood Risk areas, the Flood Risk Management Guidelines, and the River Finn Special Area of Conservation.

The Area Plan was developed in tandem with a Strategic Flood Risk Assessment which identified such flood risk areas and, in accordance with said guidelines, the land use zoning framework does not provide for both Highly Vulnerable Development (e.g. residential development, schools and essential infrastructure) in either Flood Zone A or B and does not provide for Less Vulnerable Development (e.g. retail, commercial) in Flood Zone A save where such development can be strategically justified. In addition, on foot of a fresh review of extent of certain zonings in the context of the High End Future Scenario (HEFS) Flood Zones A and B this report recommends that small portions of site NR 1.10 and NR 1.11 are rezoned as Open Space and Recreation.

Furthermore, the land use zoning framework also does not facilitate any significant development within the River Finn Special Area of Conservation. In addition, all development proposals within the plan area which likely to have a significant effect on said SAC will be subject to Appropriate Assessment in accordance with Policy BIO-P-1 of the plan and the Habitats Directive.

Appendix 19.2 Analysis Prepared in Respect of OPR Recommendation 3

To comply with this requirement the following analysis was undertaken:

- i.) A review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the 'Urban Core', 'Established Development' and Brownfield Opportunity sites;
- ii.) Identification of vacant and derelict properties not captured in i).

The results of this analysis re Pt. i.) are set out below:

Potential Housing Yield Arising From 'Urban Core', 'Established Development', Brownfield Opportunity, and Vacant and Dereliction Refurbishment Opportunities

	Planning Applications 2013-2023	Preplanning 2013-2023	Subtotal	Total After Weighting Applied (To Nearest Whole Unit)
'Urban Core'	6	19	25	15¹
Est. Dev. Area	41	31	72	43¹
Brownfield Opportunity Sites			0	0²
Vacant and Derelict Property Refurbishment Opportunities			107	27³
Grand Total 'Urban Core', 'Established Development', Brownfield Opportunity Sites and Vacant and Derelict Property Refurbishment Opportunities				85

Notes

4. The subtotals for planning applications and preplanning enquiries in the 'Urban Core' and Est Development over the period 2013-2013 (10years) were weighted by 0.6 to generate the likely yield for these categories over the 6-year lifetime of the CDP 2024-2024.
5. No Brownfield Opportunity sites are identified in Ballybofey – Stranorlar. Opp Site 4 (Potential redevelopment opportunity) is accounted for in portion of Housing target required for greenfield lands.
6. The subtotal for Vacant and Derelict property refurbishment opportunities was weighted by 0.25 as a 25% yield from these properties is considered to be a realistic target.
7. Sites where more than one form of activity was recorded (eg. a site with both a pre-planning enquiry and a planning application) were counted only once.

Therefore the total projected housing yield from brownfield is calculated to be of the order of **85** units.

Appendix 19.3 Simplified Scoring Matrix for All Potential Residential Sites

rank	Site Analysis Ref.	Zoning Reference in Draft CDP 2024	Flooding	Natura 2000	National Roads Policy	TEN-T PRIPD Alignment	Compact Score Weighted	Water Score	Wastewater Score	Road, Footpath, Public Lighting Surface Water Drainage Score	Tiered Approach T1=Serviced, T2=Serviceable, NS=Unserviceable	Active Travel Score	Topography	Physical Arrangement	Compatibility with Surrounding Land Uses	Impact on Visual and Environmental Amenities	Architectural and Archaeological Heritage	Total with Compact Weighting
1	RG D2	NR 1.1	✓	✓	✓	✓	30	10	10	10	T1	10	5	5	5	5	5	95
1	RW1	NR 1.2	✓	✓	✓	✓	30	10	10	10	T1	10	5	5	5	5	5	95
3	DT1	NR 1.3	✓	✓	✓	✓	30	10	10	10	T1	10	5	3	5	5	5	93
3	MB1	NR 1.4	✓	✓	✓	✓	30	10	10	10	T1	10	4	5	5	4	5	93
5	DW1	NR 1.5	✓	✓	✓	✓	30	10	10	9	T1	10	4	5	5	4	5	92
5	DT2	NR 1.6	✓	✓	✓	✓	30	10	10	10	T1	8	5	4	5	5	5	92
7	RG D4	Opp Site 4	✓	✓	✓	✓	27	10	10	10	T1	10	5	5	4	5	5	91
7		Opp Site 5	✓	✓	✓	✓	27	10	10	9	T1	10	5	5	5	5	5	91
9	DT3	Opp Site 2	✓	✓	✓	✓	27	10	10	10	T1	8	5	5	5	5	5	90
10	SV1	NR 1.7	✓	✓	✓	✓	27	10	10	9	T1	8	5	5	5	5	5	89

rank	Site Analysis Ref.	Zoning Reference in Draft CDP 2024	Flooding	Natura 2000	National Roads Policy	TEN-T PRIPD Alignment	Compact Score Weighted	Water Score	Wastewater Score	Road, Footpath, Public Lighting Surface Water Drainage Score	Tiered Approach T1=Serviced, T2=Serviceable, NS=Unserviceable	Active Travel Score	Topography	Physical Arrangement	Compatibility with Surrounding Land Uses	Impact on Visual and Environmental Amenities	Architectural and Archaeological Heritage	Total with Compact Weighting
11	LK1	NR 1.8	✓	✓	✓	✓	30	9	8	9	T2	10	3	5	4	4	5	87
12	GC1	NR 1.9	✓	✓	✓	✓	27	10	10	6	T2	8	5	5	5	5	5	86
13	GF1	Opp Site 1	✓	✓	✓	✓	27	10	10	10	T1	5	4	5	5	5	5	86
14	DT4 DCDP 127 BASICC		✓	✓	✓	✓	24	10	10	10	T1	5	5	5	5	5	5	84
14	LD1 DCDP 31 Barry Patton	Opp Site 3	✓	✓	✓	✓	21	10	10	10	T1	8	5	5	5	5	5	84
16	GF2	NR 1.10	✓	✓	✓	✓	24	10	10	9	T1	5	5	5	5	5	5	83
17	GC2		✓	✓	✓	✓	27	10	10	2	US	8	5	5	5	5	5	82
18	KG2		✓	✓	✓	✓	24	10	10	10	T1	2	5	5	5	5	5	81
19	LK2	NR 1.11	✓	✓	✓	✓	27	10	10	6	T2	2	5	5	5	5	5	80
20	SV2		✓	✓	✓	✓	24	10	10	4	T2	5	5	5	5	5	5	78

rank	Site Analysis Ref.	Zoning Reference in Draft CDP 2024	Flooding	Natura 2000	National Roads Policy	TEN-T PRIPD Alignment	Compact Score Weighted	Water Score	Wastewater Score	Road, Footpath, Public Lighting Surface Water Drainage Score	Tiered Approach T1=Serviced, T2=Serviceable, NS=Unserviceable	Active Travel Score	Topography	Physical Arrangement	Compatibility with Surrounding Land Uses	Impact on Visual and Environmental Amenities	Architectural and Archaeological Heritage	Total with Compact Weighting
21	GF3		✓	✓	✓	✓	21	10	10	9	T1	2	5	4	5	5	5	76
22	DW2	NR 2.1	✓	✓	✓	✓	21	10	10	7	T2	2	5	5	5	5	5	75
22	DT4 DCDP-229 Thomas Keogh		✓	✓	✓	✓	21	10	10	4	US	5	5	5	5	5	5	75
24	LK3	NR 1.12	✓	✓	✓	✓	24	10	8	6	T2	2	5	4	5	5	5	74
25	T1	NR 2.2	✓	✓	✓	✓	21	10	4	8	T2	5	4	5	5	5	5	72
25	DB2 DCDP-87 MCF Construction		✓	✓	✓	✓	21	10	10	6	T2	0	5	5	5	5	5	72
27	DT5		✓	✓	✓	✓	18	10	6	10	T2	2	5	4	5	5	5	70
28	DB1		✓	✓	✓	✓	18	10	10	5	US	2	5	4	5	5	5	69
29	KG3		✓	✓	✓	✓	21	10	0	10	US	2	5	5	5	5	5	68
30	KG4		✓	✓	✓	✓	18	10	0	8	US	2	5	5	5	5	5	63

rank	Site Analysis Ref.	Zoning Reference in Draft CDP 2024	Flooding	Natura 2000	National Roads Policy	TEN-T PRIPD Alignment	Compact Score Weighted	Water Score	Wastewater Score	Road, Footpath, Public Lighting Surface Water Drainage Score	Tiered Approach T1=Serviced, T2=Serviceable, NS=Unserviceable	Active Travel Score	Topography	Physical Arrangement	Compatibility with Surrounding Land Uses	Impact on Visual and Environmental Amenities	Architectural and Archaeological Heritage	Total with Compact Weighting
31	DB2 DCDP 132 Lorna Barron		✓	✓	✓	✓	21	10	2	2	US	0	5	5	5	5	5	60
32	RG D5		✗	✓	✓	✓												0
32	RG D3 SMS		✗	✓	✓	✓												0
32	RG D6		✗	✓	✓	✓												0
32	LD2		✓	✓	✗	✓												0

Section 20: Bundoran Area Plan

- Map identifying Potential Housing Sites, with Chief Executive's Recommendation indicated. Recommended Revision of Settlement Boundary.
- Map identifying Urban Zones, Rural/Agricultural Zones and Established Development Zones disaggregated by 'With Flood Risk' and 'Without Flood Risk'.
- Map identifying all site-specific submissions received in respect of Bundoran.

20.1 Housing and Core Strategy

Section 3: 'Core Strategy' of this Report sets out the recommended revised Core Strategy housing land allocation for Bundoran, which revisions were prepared on foot of OPR Recommendation 2. For Bundoran, the requirement is 172 units, or 5.64 hectares (on basis of 25 units per hectare).

OPR recommendation 3 then requires the Planning Authority to:

- (i) review and revise the core strategy and its determination of the area of land required to be zoned to accommodate primarily new residential development (New Residential (Phase 1)), by taking account in its detailed analysis and calculations of the potential housing yield of lands proposed to be zoned for a mixtures of residential and other uses, including:
 - (a) Urban Core;
 - (b) Established Development;
 - (c) Opportunity Site; and
 - (d) Settlement Consolidation Sites.
- (ii) revise the land use zoning maps by reducing the area of New Residential (Phase 1) to reflect the revised core strategy and omit New Residential (Phase 2) lands for Bunrana, Ballybofey / Stranorlar and Bundoran.

To comply with this requirement the following analysis was undertaken:

- i.) a review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the Urban Core, Established Development and brownfield Opportunity sites;
- ii.) identification of vacant and derelict properties not captured in i).

A detailed breakdown of this analysis is provided at the end of this section of the report. The analysis identifies a potential yield from brownfield sites of the order of **31** units over the 6-year lifetime of the plan (2024-2030).

Thus, the portion of the housing supply target required to be met by, and associated housing land allocation for, greenfield lands (@ 25 unit per ha) for Bundoran may be summarised as follows:

Revised Housing Target	172 Units
Minus potential yield from brownfield sites	-31 Units
Portion of Housing Target for greenfield lands	141 Units
Housing Land Allocation @ 25 units per Ha	5.64 Ha
Chief Executive's Recommendation 20.1:	
To adjust the Core Strategy table in line with the conclusions above, and to proceed to assess residential land supply options in this context.	
(This is considered to be a material alteration)	

20.1.1 Housing Supply Options Review

In accordance with the NPF, the Development Plan Guidelines and the Planning and Development Act 2000, the Planning Authority is effectively restricted to zoning a certain quantum of residential sites in compact, serviced, accessible locations based on the relevant Core Strategy housing supply targets and associated zoned housing land requirement for that settlement. Recommendation **20.1** above provides for a nett target of 141 units/5.64 hectares for Bundoran based on a density of 25 units per hectare.

In addition, to provide a degree of choice and avoid restricting supply through inactivity on particular landholdings, Section 4.4.3 of the Development Plan Guidelines effectively facilitates an additional provision of residential lands over and above the Core Strategy target subject to, inter alia, a maximum of 20-25% of the required quantum of zoned land and the lands being serviceable and sequential. Given the significant undersupply/inactivity on existing residential zonings during the last decade and indications during public consultation that landowners are reluctant to release sites for development, it is therefore considered appropriate to also facilitate such additional provision of zoned housing lands in the quantum of another 35 units (ie. 25% of the nett requirement of 141 units); 35 units @ 25/hectare = an additional requirement for 1.40 hectares over and above the nett Core Strategy housing land allocation set out above.

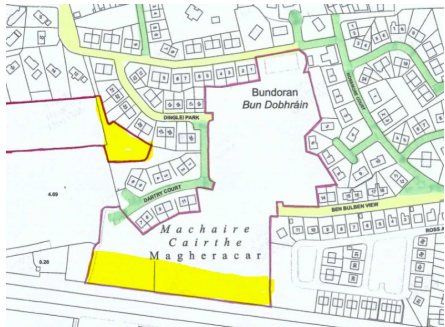
The finalised target therefore is 176 units; 176 @ 25/hectare = 7.04 hectares.

Furthermore, it is a policy and objective of Section 4.4.1 of the Development Plan Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. It is therefore also considered appropriate to retain serviced and developable land zoned for residential purposes which were previously identified in the County Development Plan, 2018-2024.

The recommendations that follow in relation to residential land supply have been made in the above-noted context.

20.1.2 Optimal Sites To Meet Land Supply Target (Plus 25%)

The top-ranked sites required to meet the Core Strategy plus 25% target are identified in descending order of rank in the table below. This schedule is comprised of both sites zoned for residential development in the Draft Plan, and sites now recommended for zoning on foot of submissions received in response to the Draft Plan consultation.

SITES ZONED IN DRAFT PLAN		
Site Label In Draft Plan;	Site Area (HA's)	Potential Yield (Units)
NR 1.3	1.30	32
NR 1.4	0.37	9
NR 1.1	1.55	39
NR 1.2	2.08	52
SUBMISSIONS RECEIVED IN RESPONSE TO THE DRAFT PLAN CONSULTATION		
Draft Plan Submission Ref. No.	Site Area (HA's)	Potential Yield (Units)
<p>DCDP-184 (part of)</p> <p>(refer to Section 20.1.4 Church Road below for rationale for inclusion of part of site only)</p>	0.91	23
<p>DCDP-210 (part of)</p> <p>The southern area identified in yellow is not supported in order to comply with national road building setback policy and CDDP TP-6 which requires a set back of 50m from the outside edge of the running carriageway National Primary Road.</p> <p>The western area identified in yellow is not support on the basis of the impact on the residential amenity of the adjoining properties.</p> 	3.47	87
<p>DCDP-194 (part of)</p> <p>The subject site is zoned part 'Open Space and Recreation' (see green area in left image below) and part 'Rural/Agricultural' (lime green in left image) in the Draft Plan. It was determined that the rezoning of lands to the north of the site (lime green area) as New Residential Phase 1 was considered to be consistent with the implementation of effective compact growth.</p> <p>The 'Open Space and Recreation' area was so zoned due to these lands being identified within Flood Risk areas in the Strategic Flood Risk Assessment prepared in support of the Draft Plan (see right side image below), noting that residential development cannot be supported in flood risk areas in accordance with Flood Risk Guidelines.</p>	0.87	22

<p>DCDP-221 (part of)</p> <p>As can be seen from the images below, the subject site extends significantly to the south of the southern edge of site NR 2.5. It is considered a more orderly form of development to have the southern edge of the subject site broadly in line with the southern edge of the adjacent site.</p>	<p>3.07</p>	<p>77</p>
<p>OVERALL TOTAL</p>	<p>13.62Ha</p>	<p>341</p>

Chief Executive’s Recommendation 20.2:

- a) To retain the Draft Plan sites identified in the table above as New Residential Phase 1; and
- b) To rezone those sites identified in submissions DCDP-184 (part of); DCDP-210 (part of); DCDP-194 (part of); DCDP-221 (part of) as ‘New Residential Phase 1’.

(The sites in Part (b) of this recommendation are considered to be material alterations.)

20.1.3 Additional Sites Justified For Residential Zoning

OPR recommendation 7(ii.) requires the omission of New Residential Phase 2 site ref. nos. 2.1, 2.2, 2.3, 2.4 and 2.5 in the Draft Plan.

Chief Executive's Response:

Section 4.4.1 of the Development Plan Guidelines provides that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning. All five sites are zoned 'Residential Phase 1' in the current CDP2018-2024, are serviced and can be developed for housing during the life of the Plan. The recommendation below is made having regard to the aforementioned.

Chief Executive's Recommendation 20.3:

To retain the above-noted Draft Plan zonings.

20.1.4 Recommendations Against Residential Zoning

Several sites are not recommended for residential zoning. These are identified in red on Map 20.1 of this Report and in the tables below, together with the submitted supporting rationale for the requested zoning. These sites are not supported based on: (i.) higher scoring alternative sites (the scoring matrix is attached at the end of this section of the report) identified to meet the Core Strategy requirement as referred to above; and (ii.) in some instances, site-specific issues – summary responses to these specific issues are also set out below.

Church Road

In the Draft Plan, three sites to the rear of the detached dwellings on Church Road (ref. nos. NR 1.1, NR 1.2 and NR 1.3) were zoned for residential development. Three submissions request the zoning of additional areas to the immediate east of the eastern edge of the aforementioned sites. The submission refs. are:

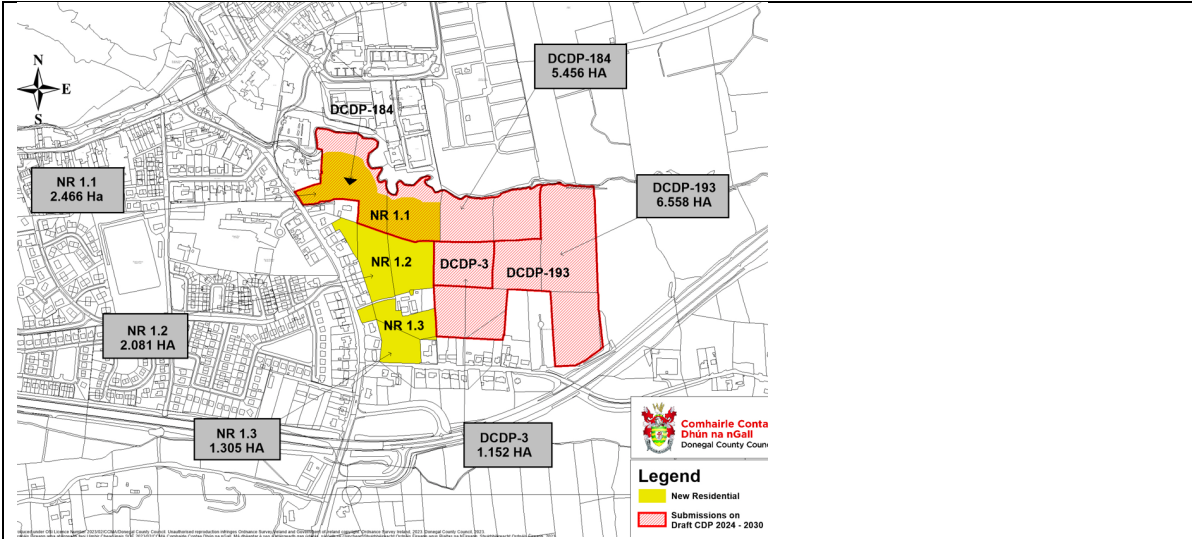
DCDP-3 Brian McHenry;

DCDP-184 Evelyn & Noel Sharpe + others; and

DCDP-193 Eamon Barrett & Colooney Development Ltd.)

Chief Executive's Response:

The three sites zoned in the Draft Plan had a combined area of 4.86 hectares (and therefore a potential housing yield of 121 units at 25 units/hectare). The total combined area of the sites proposed in the three submissions is 13.16 hectares with a potential yield of 329 units at 25 units/hectare). To zone all sites would result in a total of 13.16 hectares (and therefore a potential yield of 329 units at 25 units/hectare).



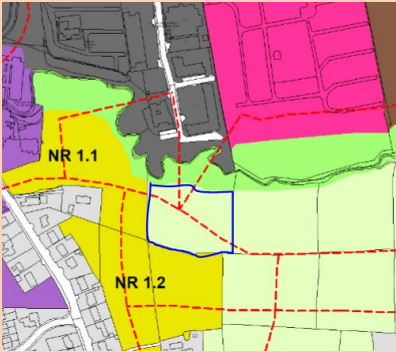
This must be considered in the context of the overall requirement for Bundoran of **176 units; 176 @ 25/hectare = 7.04 hectares**. Having regard to the need to provide a range and choice of housing sites around the town, the zoning of all of these lands would result in the zoned land requirements for Bundoran being significantly exceeded. This is considered to be outside of the scope of this Plan.

The Plan can support a more proportionate scale of development in this part of the town. The zoning of the lands closest to Church Road as proposed in the Draft Plan is considered to be the most orderly way to proceed.

In the assessment of subm. ref. 184 it has been noted that the pedestrian bridge link required to connect these broader development lands across the river to the town centre would 'land' within this portion of land. That being the case, it is submitted that there is merit in including this portion of land within site NR 1.1 in order to ensure that the aforementioned link is secured.

Chief Executive’s Recommendation 20.4:

Not to support the zoning for residential purposes of all lands identified in submission ref. nos. DCDP-3 Brian McHenry; DCDP-184 Evelyn & Noel Sharpe + others; and DCDP-193, save for the western portion of the lands proposed in DCDP-184 as identified in blue below:

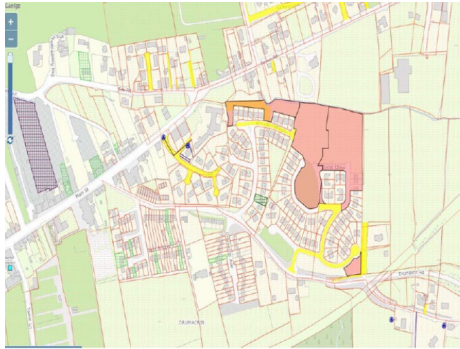


(This is considered to be a material alteration)

Other Proposals

EBV Construction DCDP-196

Requests re-zoning of lands identified in the Maps below from Open Space/Agricultural to residential in accordance with the previous zoning of Residential Phase 1 in the previous Bundoran LAP. Planning permission was recently granted at this location (Ref: 23/50817).



Chief Executive's Response:

The subject lands were zoned part 'Established Development' (marked in grey below) and part 'Open Space and Recreation' (marked in green below) in the Draft Plan. It is assumed that the relevant parties have no objection to the area zoned 'Established Development'.

The area zoned 'Open Space and Recreation' was so zoned due to these lands being identified within Flood Risk areas in the Strategic Flood Risk Assessment prepared in support of the Draft Plan – see below, noting that residential development cannot be supported in flood risk areas in accordance with Flood Risk Guidelines.

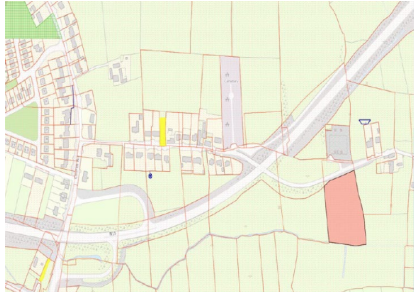


Chief Executive's Recommendation 20.5:

Not to amend the Plan.

Eamon Barrett DCDP-220

Requests an extension of the town boundary to include the lands identified as below.

**Chief Executive's Response:**

Given that the lands are located outside of the town bypass and significantly removed from the built-up area, it is considered that inclusion of this site within the boundary would be contrary to the national and regional compact and sequential growth policy agenda.

Chief Executive's Recommendation 20.6:

Not to amend the Plan.

Settlement Capacity Audit

OPR recommendation 9(i.) requires that the Authority:

- (i) provide a settlement capacity audit, as necessary, to establish the evidence-base and the status of all lands proposed to be zoned under the Plan in accordance with the methodology for a tiered approach to land zoning under Appendix 3 of the NPF, relating to existing development services, that is:
- (a) road and footpath access including public lighting;
 - (b) foul sewer drainage;
 - (c) surface water drainage;
 - (d) water supply and/or additional service capacity;
- including a written analysis to determine lands that are serviced (tier 1) and lands that are serviceable zoned land during the plan period (tier 2), including a costing estimate for the delivery of same;

The audit for (Settlement Capacity Audit for Bundoran) is provided below.

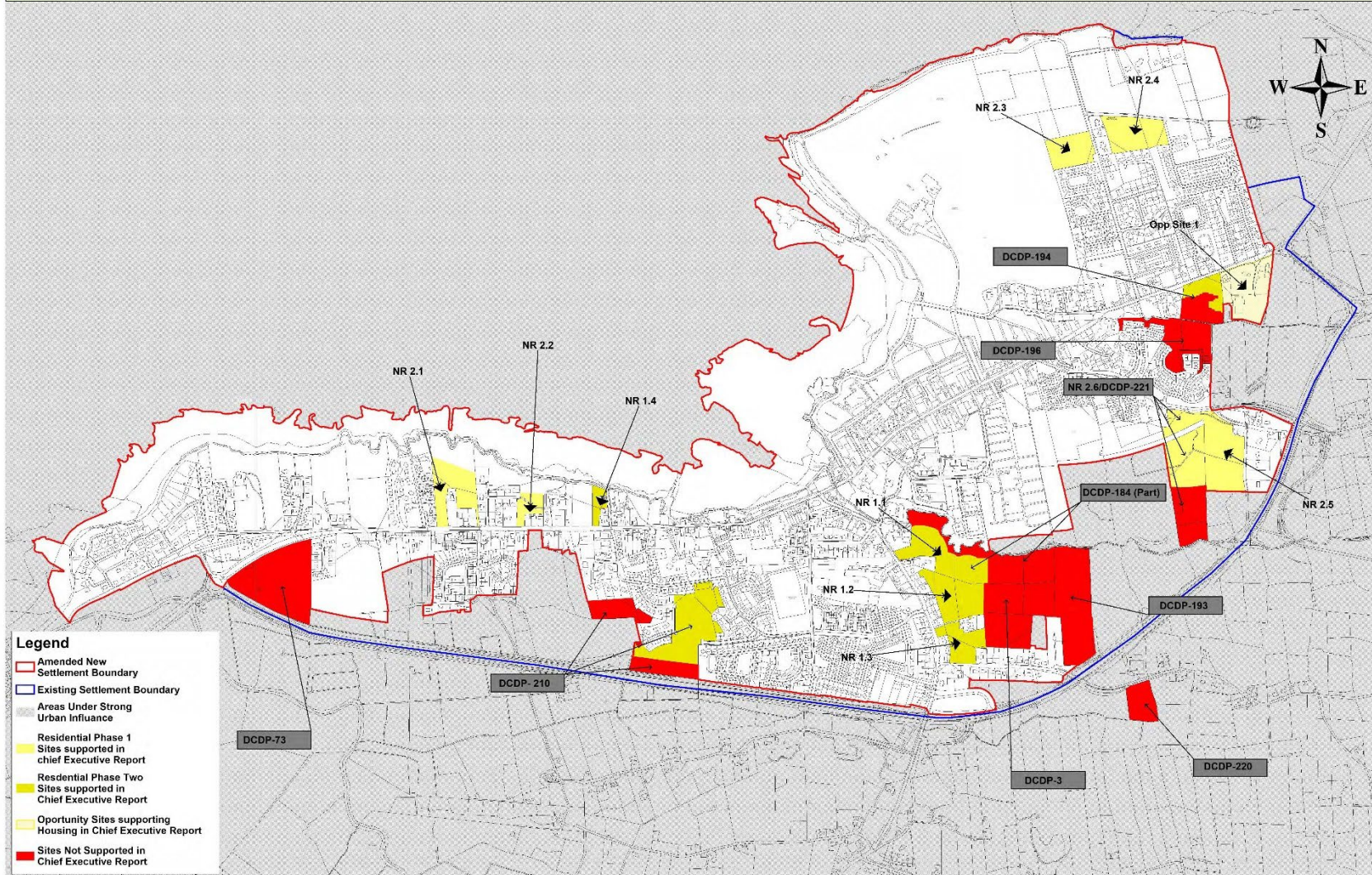
SETTLEMENT CAPACITY AUDIT.					
Zoning Reference	Rd, footpath & public lighting	Foul sewer	Surface water sewer	Water supply	Written Analysis re Tier 1 & Tier 2
NR 1.1	Y*	Y	Y	Y	All services available. *Additional public lighting required.
NR 1.2	Y*	Y	Y*	Y	All services available. *Additional public lighting required. Drainage assessment required
NR 1.3	Y*	Y	Y*	Y	All services available. *Additional public lighting required. *Drainage assessment required
NR 1.4	Y*	Y	Y*	Y	All services available. *Additional public lighting required at entrance *Assessment of road-side drainage.
DCDP-210	Y*	Y	Y	Y	All services are available, *Roads in abutting estate are not taken in charge by the Council and will require extensive work to bring these roads, footpaths and public lighting up to the recommended standard.
DCDP-194	Y	Y	Y	Y	All services available.
NR 2.1	Y	Y	Y	Y	All services available.
NR 2.2	Y	Y	Y	Y	All services available.
NR 2.3	Y*	Y	Y	Y	All services available. *Additional public lighting required and assessment of roadside drainage. *Pumped discharge to sewer and/or extensions to network may be required. Network in adjacent estates may provide options for connection.
NR 2.4	Y	Y*	Y*	Y	All services available. Extensions to sewer network may be required. Network in adjacent estates may provide options for connection. *Drainage assessment required
NR 2.5	Y*	Y	Y*	Y	All services available. *Additional public lighting required. *Drainage assessment required

DCDP-221	Y*	Y	Y	Y	All services available. *Construction of part of link road Through northern part of site may be required. *Additional public lighting required. *Drainage assessment required
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OPR Recommendation 9(ii.) also requires the Authority to amend the land use zoning objectives for the town to ensure that lands that are neither serviced nor serviceable during the life of the Plan are not zoned for development. Members are advised that the recommendations above would provide for compliance with this requirement.



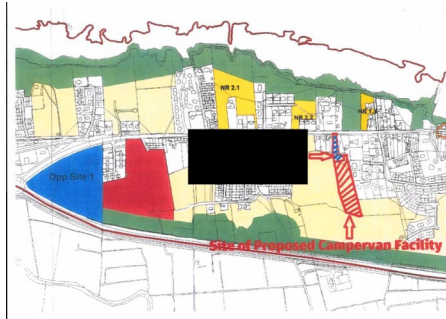
Chief Executive's Report on Draft Plan Public Consultation Submissions.
Map 20.1 (Bundoran): (1.) Identification of Potential Housing Sites, With Chief Executive's Recommendation Indicated;
(2) Recommended Revision Of Settlement Boundary



20.2 Economic Development and Employment

Patrick Heaney, Lands at Magheracar - DCDP 27

Seeks rezoning of lands from 'Rural Agricultural' to be rezoned to enable the provision of a serviced camper van site, comprising of a shower block and camper van bays which would be developed and run by the current land-owner. The overall land holding at this location formed part of a previous multiple residential development which received permission Planning Ref:04/10061. There is an increasing need of a development of this nature in Bundoran to cater for the current demand.



Chief Executive’s Response:

The site is located immediately adjacent to a long-established residential area on its eastern side. The nature of the proposed use is likely to give rise to noise and other disturbance at night. For these reasons it is considered that the proposed use would be incompatible with the adjacent established uses. In addition, it is considered that the most appropriate locations for such developments are in and around the town centre in terms of supporting local businesses.

Chief Executive’s Recommendation 20.7:

Not to amend the Plan.

20.3 Transportation

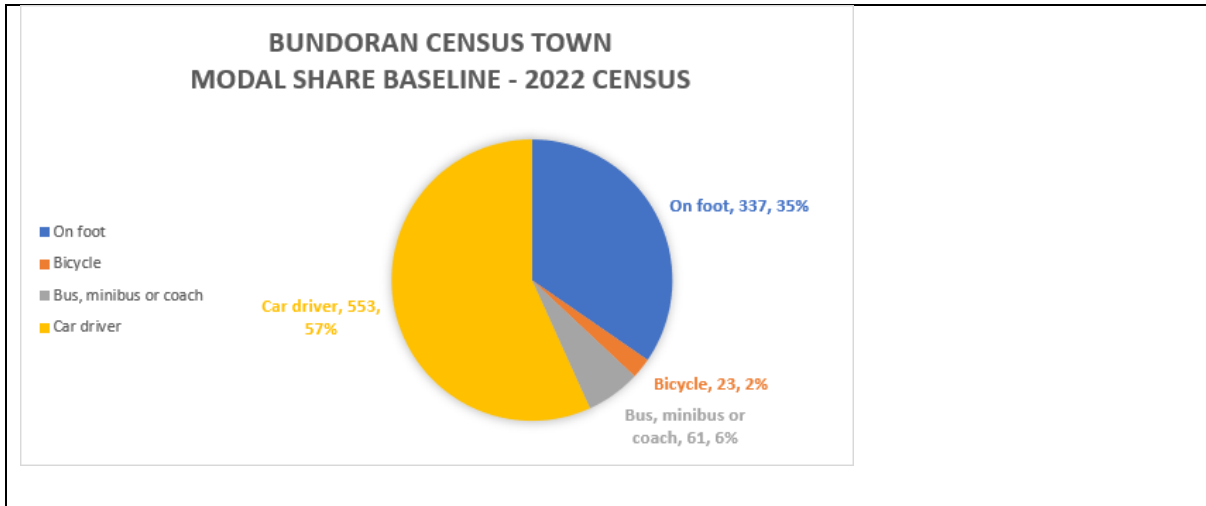
OPR DCDP- 211

Recommendation 15.2 requires the inclusion of modal share baseline and targets for Bundoran.

Chief Executive’s Response:

The baseline modal share for Bundoran is identified in the image below. The current data indicates that pedestrian and bus transport modes enjoy a healthy share of the overall transport modes utilised at 35% and 6% respectively, (CSO 2022).

With regards to setting a target, it is considered that developing meaningful targets would require engagement with the NTA.



Chief Executive’s Recommendation 20.8:

Insert the above-noted information in the Transportation section of the Bundoran Plan.

(This is considered to be non-material.)

20.4 Flooding

OPR DCDP- 211

Recommendation 16 requires the Authority is required to review Opportunity Site 3 in terms of flood risk.

Chief Executive’s Response:

The boundary for this site was formulated having full regard to the flood risk evidence prepared as part of the Strategic Flood Risk Assessment. The identified site was entirely outside of the flood risk area.

Chief Executive’s Recommendation 20.9:

Not to amend Plan from a flood risk perspective, but refer also to Section 20.7: Opportunity Sites where a further OPR recommendation to reduce the extent/boundary of this site is also addressed.

20.5 Urban Regeneration and Town Centre

OPR Recommendation 10 is addressed in Section 5 of this Report.

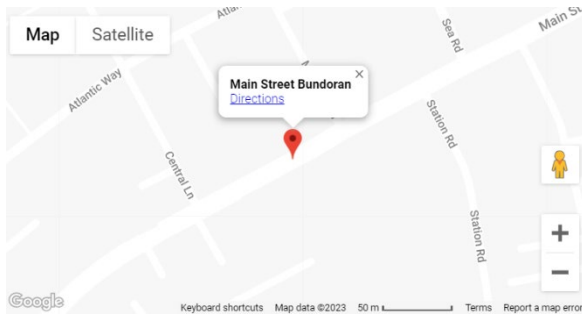
20.6 Recreation, Community and Heritage

Bundoran Community Centre - DCDP 139

Concerned that the Bundoran Community Centre (Bundoran Community Development CLG – as per Map below) is not recorded or zoned as ‘Community Infrastructure’ and requests that this is amended.

Also concerned re the capacity of the current facility and the inability to meet the needs within the community. There is a need for a future town centre greenfield/opportunity site to provide for a

purpose-built indoor and outdoor facility that will cater for present and future demand of a community facility of this nature.



Chief Executive's Response:

The Urban Core contains numerous different uses and is designed to allow for a broad range of facilities and services, inclusive of community type facilities/services such as the Community Centre. In that regard it is considered that the Draft Plan zoning is sufficient.

With regard to the proposal for a centrally-located new facility, the 'Urban Core' zoning would support the principle of such a facility.

Chief Executive's Recommendation 20.10:

Not to amend the Plan.

Shane Smyth, Bundoran – DCDP 53

This submission has two requests:

- a. the provision of a traffic free path to both schools from existing estates and proposed new residential developments within the Active Travel/Residential/Road Corridor Area.
- b. the provision of a complete looped walk of the town that would meet the Rougey Walk/West End Walk. It states that this provision would further complement current trail proposals which are being worked upon within the town.

Chief Executive's Response:

Having regard to the form and layout of the town, inclusive of the arterial road layouts, the proposed arrangement is unlikely to be achievable. The town is well served with public footpaths. Any future developments in the town will have to comply with the Chapter 20 Table 20.2 Transport/Sustainable Mobility Strategy for Bundoran, and this should ensure good connectivity to the existing network.

The potential value in linking the two referenced sections of coastal walkway is already addressed in the Plan under Action BN-LAP-1: '*The Council will investigate options to Link West End Cliff Walk and Rougey Walk in recognition of the potential economic, social and health benefits offered by such coastal walking routes.*'

Chief Executive's Recommendation 20.11:

Not to amend the Plan.

Fáilte Ireland DCDP 189

Requests specific support in the Plan for the delivery and implementation of the Tullan Strand Centre for Water Sports Activities (received funding under the Fáilte Ireland's Platforms for Growth Programme).

This is addressed in Section 10 Tourism.

20.7 Opportunity Sites**Opportunity Site 1****OPR - DCDP 211; Michael Cullen – DCDP 73; and TII – DCDP 148**

- OPR's Recommendation 11 requires the omission of the site (and also to omit Opp Site 2 and significantly reduce Opp Site 3 – these latter two sites are addressed further below).
- Mr. Cullen's requests consideration of residential use on the site.
- TII raises concerns regarding the location of all three Opportunity sites on the basis of the nature of land use proposed and the proximity of the sites to the N15. Recommends that development proposals should be subject to Traffic and Transport Assessments and that the requirements for such assessments would be set out in the Draft Plan. Also recommends that regard is given for the potential cumulative impacts of such developments, and active travel and sustainable mobility measures are identified to ensure the lands are well served by sustainable transport options.

Chief Executive's Response:

All of the Opportunity Site zoning are, in some ways, a legacy from previous development plans. It must be acknowledged that Opp Site 1 is on the extreme periphery of the town and at a significant distance from the centre. For these reasons, the rationale underpinning the OPR recommendation in terms of compact and sequential growth is acknowledged.

The OPR rationale applies to most uses, and particularly residential. Therefore, the proposal by Mr. Cullen to include residential use as an option cannot be supported.

Chief Executive's Recommendation 20.12:

To exclude 'Opportunity Site 1' outside of the settlement boundary.

(This is considered to be a material alteration.)

Opportunity Site 2**OPR - DCDP 211; and TII – DCDP 148**

The comments of the respective submissions are the same as their comments in respect of Opportunity Site 1.

Chief Executive's Response:

As per comments in respect of Opp Site 1 above.

Chief Executive's Recommendation 20.13:

To exclude 'Opportunity Site 2' outside of the settlement boundary.

(This is considered to be a material alteration.)

Opportunity Site 3

OPR - DCDP 211; TII – DCDP 148; and Aldi – DCDP 105

OPR Recommendation 11(ii.) requires the omission of Opp Site 3, apart from: the unfinished houses, the disused service station and lands to the immediate south and west thereof.

TII's comments are as per those for Opp Site 1 and Opp Site 2.

Aldi raises concern over the lack of rationale for what it describes as a significant variation in policy approach precluding retail development forming the primary use on a site at any location outside of the town centres of Letterkenny, County Growth Drivers and Service Towns (including Bundoran) and omits the possibility of retail development at OPS 3 in Bundoran. Seeks the inclusion of a retail element to the Opp Site 3 and amendment to footnote 13, Table 20.1 (Land Use Zoning Matrix for Bundoran), to provide for the provision of convenience retail including a medium size supermarket of up to 1,500sqm net retail floor space. in respect of part of Opp. Site 1.

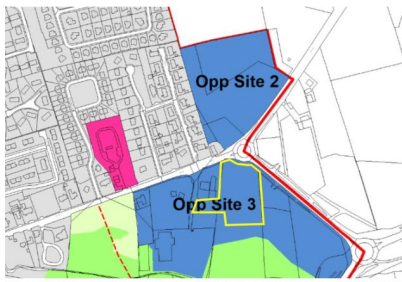


Figure 1.1: Extract of draft Bundoran Area Plan 2024-2030 Land Use Zoning Map

This amendment would enable the scope for the development of an Aldi retail store at the defined location.

Refers to an active pre-planning enquiry with DCC. The site was identified as the only potential and viable site in the Bundoran area for a retail development of the scale, nature and mass required. Reference to the current CDP 2018-2024 Policy BD-TC-P-3 and the Retail Strategy Policies; RS-P-2; RS-P-3; and RS-P-4 and how the site has capacity to accommodate a potential retail development in a sustainable manner subject to satisfying the sequential test in the context of the Retail Planning Guidelines 2012.

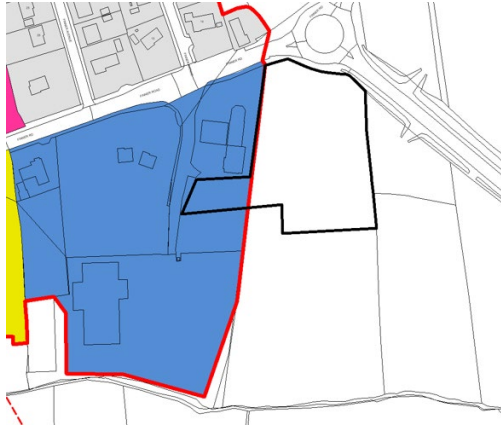
Concerned at the proposed amendment in the Draft CDP to the Opp Site 3 zoning objective and associated policy, essentially omitting retail as a primary use at this location and the capacity of this approach to undermine the progress made to -date on the pre-planning application with DCC. Cites the need and demand for this type of retail development in Bundoran based on the strategic importance of the town in the Core Strategy for the county and as a gateway to the eastern part of the town near the N15 and the expanding population base in the town since 2016 which has at present outgrown the population projections of the Draft Plan Core Strategy.

Concerned re the absence of a rationale for the difference between the wording of Policy RS-P-3 in the current CDP 2018-2024 and the wording of the equivalent Policy RS-P-2 of the Draft Plan, given that there has been no change in National Policy or Section 28 Guidelines which would justify this change. Suggests that this is contrary to the Planning and Development Act, 2000 which requires Development Plans to be consistent with Section 28 Guidelines.

Chief Executive's Response:

As per the responses to Opp. Site 1 and Opp. Site 2 above, the rationale of the OPR is acknowledged. The amended boundary as prescribed by the OPR is illustrated below (in blue),

together with the boundary of a site identified by Aldi for their proposed store (black outline). It can be seen that most of the 'Aldi site' lies outwith the OPR-prescribed site.



With regard to Aldi’s comments re the general retail policy framework, the current CDP and Draft Plan policies are inserted below for ease of reference. The policy adjustment is considered appropriate in the context of the numerous Government policy documents urging a move to a compact and sequential growth-focused policy approach. Furthermore, Draft Plan Policies RS-P-3 and RS-P-4 allow for the consideration of alternatively located retail developments although it is acknowledged that adherence to the OPR recommendation will preclude the Planning Authority from considering the Aldi proposal under these policies.

CDP 2018-2024	Draft Plan
<p>RS-P-3: It is a policy of the Council to consider proposals for Small to Medium sized food/ convenience stores (up to 1500 square metres net) at appropriate locations in Layer 1 and Layer 2 settlements as identified in the Core Strategy, subject to the provisions of Policy RS-P-5 and RS-P-6.</p>	<p>RS-P-2: It is a policy of the Council to consider proposals for small-to-medium sized food/ convenience stores (up to 1500 square metres net) in the town centres of Letterkenny, the County Growth Drivers and Service Towns as identified in the Core Strategy subject to the provisions of Policy RS-P-3 and RS-P-4.</p>

Chief Executive’s Recommendation 20.14:

To reduce the extent of 'Opportunity Site 3' consistent with the OPR recommendation, and to exclude the residual lands outside of the settlement boundary.

(This is considered to be a material alteration.)

20.8 Miscellaneous Issues

EBV Construction Ltd. - DCDP 198

Requests re-zoning of lands from 'Rural Agricultural' to 'Established Development' as there is an existing property on this site.

**Chief Executive's Response:**

Agreed.

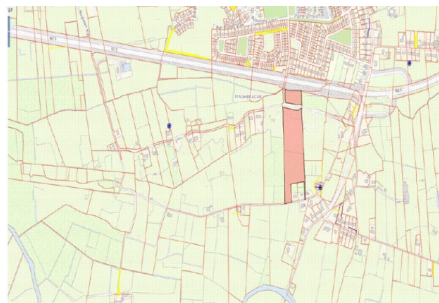
Chief Executive's Recommendation 20.15:

Rezone lands from 'Rural Agricultural' to 'Established Development'.

(This is considered to be non-material.)

DCDP 206 - Niall Barrett,

This submission rejects the proposed re-zoning of a parcel of land at Magheracar as per the Map below on the grounds that said lands are outside the Bundoran Area Plan. These lands were previously approved planning permission for quarry by An Bord Pleanála. A justification for this re-zoning of these lands is set out on the basis of the nature of the existing land-use on the site and the importance of natural resources as highlighted as an objective in the Plan.

**Chief Executive's Response:**

The bypass provides a sensible boundary at this location. The exclusion of the site from the settlement boundary does not preclude consideration a quarry operation at the site.

Chief Executive's Recommendation 20.16:

Not to amend the Plan.

DCDP 205 – James & Davina Barrett,

Requests re-zoning of lands from 'High Amenity' (highlighted in the Map below) to 'Established Development' as per others on Tullan Strand Road.

**Chief Executive's Response:**

It is agreed that the easternmost plot containing an existing dwelling should be zoned as 'Established Development'. This dwelling and the other existing units to the east are addressed collectively at Section 20.9 of this Report. The westernmost plot is undeveloped. This land is within an area zoned as 'High Amenity'. Having regard to this amenity, the proposal is not supported.

Chief Executive's Recommendation 20.17:

Not to amend the Plan.

DCDP 235 – Conlan Barrett Auctioneers Ltd.**DCDP 249 – James Keenan,**

Conlan Barrett: Notes concerns re the use of out-of-date and inaccurate population data. These figures are not reflective of the current population and the increase in the town since 2016.

Also concerned re the impact this population increase has had on the delivery of services in the town eg: increase in school numbers, delivery of medical care, recreational supports, supply of housing for permanent and rental usage, and the impact on the tourism sector due to the lack of tourist accommodation to support this sector. Requests the provision of additional lands for housing development to meet the current demand.

James Keenan: Notes concerns re the lack of uptake in the development of residential units on zoned lands in Bundoran over the course of the existing CDP 2018-2024. Refers to a report prepared by estate agents/auctioneers operating in the area, and sets out results from surveys of both resident and holiday home residents, together with the new Ukrainian residents and their experiences of securing housing units in Bundoran. The assessment indicated that there was zero housing units delivered on lands over the course of CDP 2018-2024. Also refers to various matters which have inhibited development on these lands such as infrastructural matters and land ownership issues. This submission calls for an investigation of additional suitable landbanks to be explored in the current draft plan.

Chief Executive's Response:

Section 3 of this Report deals with amendments to the Core Strategy contained in the Draft Plan, inclusive of the allocation of a greater portion of the overall growth projections for the County to Bundoran. This section of the Report also identifies how the recommended zoned lands will further exceed this increased allocation.

Chief Executive's Recommendation 20.18:

Not to amend the Plan.

Andrew O’Byrne - DCDP 238
Refers to the proposed zoning of NR 2.2 for residential use and expresses concern re the negative impact a development of this nature will have on the visual amenity (seaward view) of the adjacent properties, the quality of life of these residents together with negative impact on the value of said properties. Also concerned re the negative impact of development on wildlife in this green space having sighted curlews in this area.
Chief Executive’s Response: The subject site would provide for a small-scale development only. Having regard to the low eaves height, rear boundary foliage and rear curtilage domestic sheds etc. of the established roadside houses, it is considered that the site can accommodate similar-scaled houses.
Chief Executive’s Recommendation 20.19: Not to amend the Plan.

Uisce Eireann DCDP-138																				
Notes that ‘Transport and Utilities Infrastructure’ is referenced as a zoning in Table 17.1 but does not form part of the zoning table in Chapter 20.1																				
Chief Executive’s Response: The reason the Transport and Utilities Infrastructure Zoning does not form part of the Zoning Matrix in Table 20.1 is that there is no such zoning within the Bundoran Land Use Zoning map. Nevertheless, in the interests of clarity it is considered appropriate to insert a row for water services infrastructure into the Zoning Matrix in Table 20.1 as recommended below.																				
Chief Executive’s Recommendation 20.20: Insert the following row and associated footnote into Table 20.1 – Land Use Zoning Matrix for Bundoran:																				
<table border="1"> <thead> <tr> <th>Land Use</th> <th>Urban Core</th> <th>New Residential (Phase 1)</th> <th>New Residential (Phase 2)</th> <th>Established Development</th> <th>Opportunity Site</th> <th>Business/Enterprise</th> <th>Community Infrastructure</th> <th>Open Space and Recreation</th> <th>Rural/Agricultural</th> </tr> </thead> <tbody> <tr> <td>Water/Wastewat</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0¹⁴</td> <td>0</td> </tr> </tbody> </table>	Land Use	Urban Core	New Residential (Phase 1)	New Residential (Phase 2)	Established Development	Opportunity Site	Business/Enterprise	Community Infrastructure	Open Space and Recreation	Rural/Agricultural	Water/Wastewat	0	0	0	0	0	0	0	0 ¹⁴	0
Land Use	Urban Core	New Residential (Phase 1)	New Residential (Phase 2)	Established Development	Opportunity Site	Business/Enterprise	Community Infrastructure	Open Space and Recreation	Rural/Agricultural											
Water/Wastewat	0	0	0	0	0	0	0	0 ¹⁴	0											
Footnote 15: Proposals for large scale water services infrastructure on lands zoned Open Space and Recreation (e.g. municipal wastewater/water treatment plant infrastructure, sewage pumping stations etc.) will <u>not</u> normally be acceptable within said zoning. Development applications for small scale water services infrastructure (e.g. individual wastewater treatment systems, watermains and sewers) will																				

be open to consideration within said zoning if not otherwise exempted development. All development proposals will be subject to the requirements of the Flood Risk Management guidelines.

(This is considered to be a material alteration)

Analysis Prepared In Respect of OPR Recommendation 3

To comply with this requirement the following analysis was undertaken:

- iii.) a review of planning applications and pre-planning enquiries for residential development over the years 2013-2023, and submissions made on the Draft Plan for sites within the Urban Core, Established Development and brownfield Opportunity sites;
- iv.) identification of vacant and derelict properties not captured in i).

The results of this analysis re Pt. i.) are set out below:

	Urban Core	Est. Dev. Areas	Opportunity Sites	Total
Residential Planning Applications (no. of units)	0	153	0	153
Pre-planning enquiries (no. of units)	0	0	0	0
Draft Plan submissions (no. of units)	0	0	0	0
TOTAL	0	153	0	153

Nb. sites where more than one form of activity was recorded eg. a site with both a pre-planning enquiry and a planning application, were counted only once.

Re Pt. ii.), the total number of vacant and derelict properties, excluding significant sites already captured in the analysis at Pt. i) above is 126. A 25% yield from these properties is considered to be a realistic target.

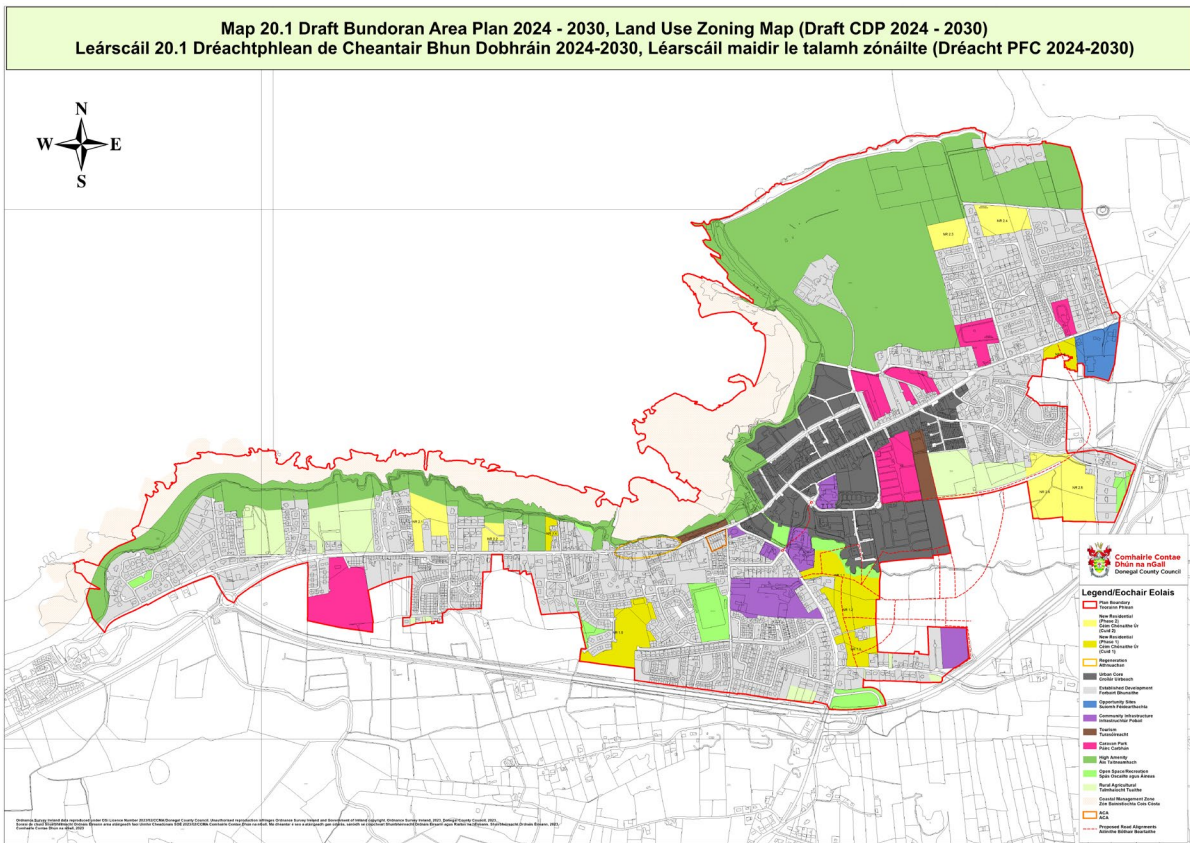
Thus the total projected housing yield from brownfield is calculated to be of the order of 31.

20.9 Recommendation from the Council's Executive.

Recommendation 1

<p>Issue Identified</p> <p>The Draft Bundoran Area plan boundary contains a significant quantum of land zoned 'Rural/Agricultural' zoning which lies outside the built up urban footprint of the town, which is not required to be zoned for any other purpose (e.g. business/enterprise, residential etc) and which essential constitutes part of the rural area.</p>
<p>Chief Executive Response</p> <p>Based on the above it is considered that the Bundoran Area Plan Boundary be amended to exclude peripheral 'Rural/Agricultural' Zonings lying outside the built up urban footprint of the town.</p>
<p>Chief Executive's Recommendation 20.21:</p> <p>Amend the Bundoran Area Plan Boundary to exclude peripheral 'Rural/Agricultural' Zonings as detailed in the map 1 below.</p> <p>(This is considered to be a material alteration.)</p>

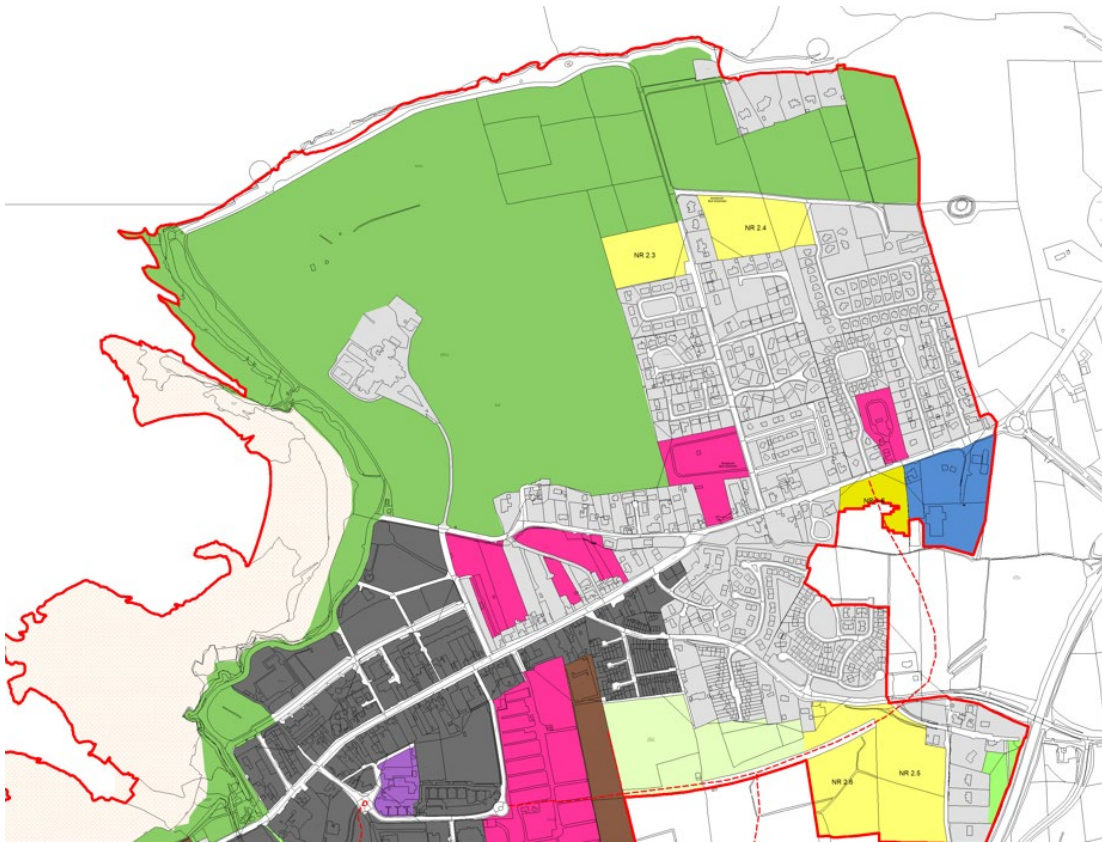
Map 1



Recommendation 2

Issue Identified
The Draft Bundoran Area plan boundary identified an area along the northern plan boundary as 'High Amenity'. Contained within this area are 5 no. properties which can be defined as 'Established Development'.
Chief Executive Response
Based on the above it is considered that the Bundoran Area Plan Boundary be amended to zone this area as 'Established Development' contained within an area of High Amenity.
Chief Executive's Recommendation 20.22:
Amend the Bundoran Area Plan Boundary to identify the properties located within the High Amenity Area as 'Established Development' as detailed in the map 2 below
(This is considered to be a material alteration.)

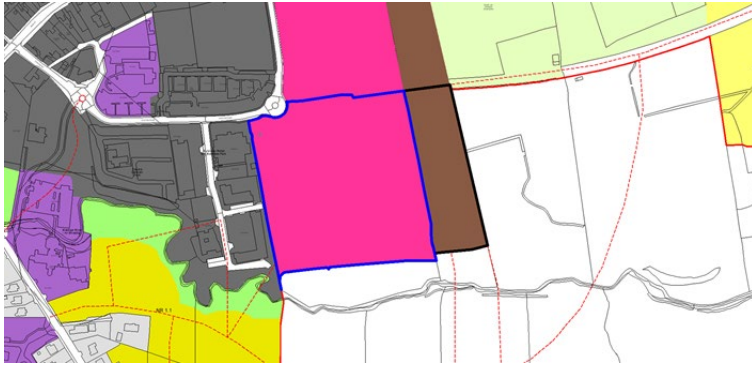
Map 2



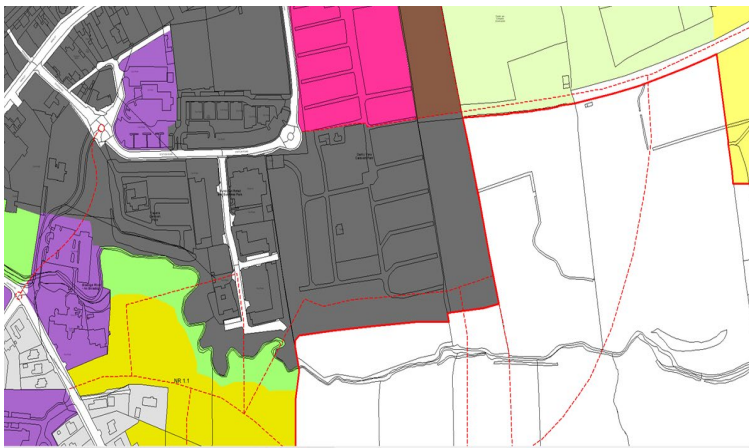
Recommendation 3

<p>Issue Identified</p>
<p>The Draft Bundoran Area plan boundary identified two areas east of the Urban Core zoned as (i). Caravan Park (area shaded pink inside the blue line in Map 3(a) below) and (ii). Tourism (area shaded brown inside the black line) in Map 3(a) below. Having regard to the proximity of both these areas to the Urban Core, together with the availability of access to the required infrastructural services to facilitate future development in this area, it is recommend that this area is rezoned as 'Urban Core'. The northern boundary of the proposed newly zoned lands will also allow for the provision of the proposed link road which will create a new access route from the Drumacrin Road to the town centre.</p>
<p>Chief Executive Response</p> <p>Based on the above it is considered that the Bundoran Area Plan Boundary be amended to zone this area as 'Urban Core'.</p>
<p>Chief Executive's Recommendation 20.23:</p> <p>Amend the Bundoran Area Plan Boundary to rezone the area as 'Urban Core' as detailed in the map 3(a) below.</p> <p>(This is considered to be a material alteration.)</p>

Map 3(a)



Map 3(b)



SECTION 21: SETTLEMENT FRAMEWORKS

FLOOD RISK

OPR DCDP-211	
<p>OPR recommendation 16(ii.) requires a review, from a flood risk perspective, of the regeneration opportunities identified on the settlement framework maps for Carrick, Ballintra, Kilcar, Pettigoe, Burtonport, Dunfanaghy, Glenties, Newtowncunningham, Ramelton and Rathmullan.</p>	
<p>Chief Executive's Response:</p> <p>The review requested by the OPR has been undertaken and the results (ie. the flood risk zones overlaid on the settlement framework maps) can be viewed at the following link:</p> <p>Six of the identified regeneration areas (Ballintra, Kilcar, Pettigo, Burtonport, Dunfanaghy and Glenties) are significantly impacted, whilst Rathmullan is also impacted to a lesser degree. It is not proposed to amend the boundaries of these areas as, for example, the flood risk areas could still benefit from water compatible regeneration initiatives such as public realm improvements. Rather, the appropriate response is to apply policy consistent with the general policy approach recommended in Section 8.4: 'Flooding' to limit development affecting existing built property to minor development only and new development to water compatible uses as per Section 5.28 of the '<i>Planning System and Flood Risk Guidelines</i>' (DEHLG and OPW, Nov. 2009).</p>	
<p>Chief Executive's Recommendation 21.1:</p> <p>Insert additional policy in Chapter 21:</p> <p>Policy F-P-xx: Within flood risk areas identified within settlement frameworks, only the following developments will be considered:</p>	
<p>Areas of established development, including those parts of the Ballintra, Kilcar, Pettigo, Burtonport, Dunfanaghy and Glenties, and Rathmullan Regeneration Opportunities,</p>	<p>New (currently undeveloped) area</p>
<p>Minor development only (eg. small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises, unless they obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substance); and</p> <p>Such applications shall be accompanied by a commensurate assessment of the risks of flooding to demonstrate that they would not have adverse impacts or impede access to a</p> <p>watercourse, floodplain or flood protection and management facilities. Such proposals shall nfollow best practice in the management of</p>	<p>Water compatible uses only as per Section 5.28 of the '<i>Planning System and Flood Risk Guidelines</i>' (DEHLG and OPW, Nov. 2009).</p>

health and safety for users and residents of the proposal.	
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Flood risk areas may be viewed at the following link: [Settlement Frameworks with High-End Future Flooding Scenario Analysis \(arcgis.com\)](#)

(This is considered to be a material alteration.)

DONEGAL MD AREA SETTLEMENT FRAMEWORK SITE-SPECIFIC SUBMISSIONS

The settlements that are the subject of such submissions are listed below:

- Ballintra
- Bruckless
- Frosses
- Mountcharles; and
- Rossnowlagh

BALLINTRA

Name/Submission Ref. No.: John McHugh DCDP-124

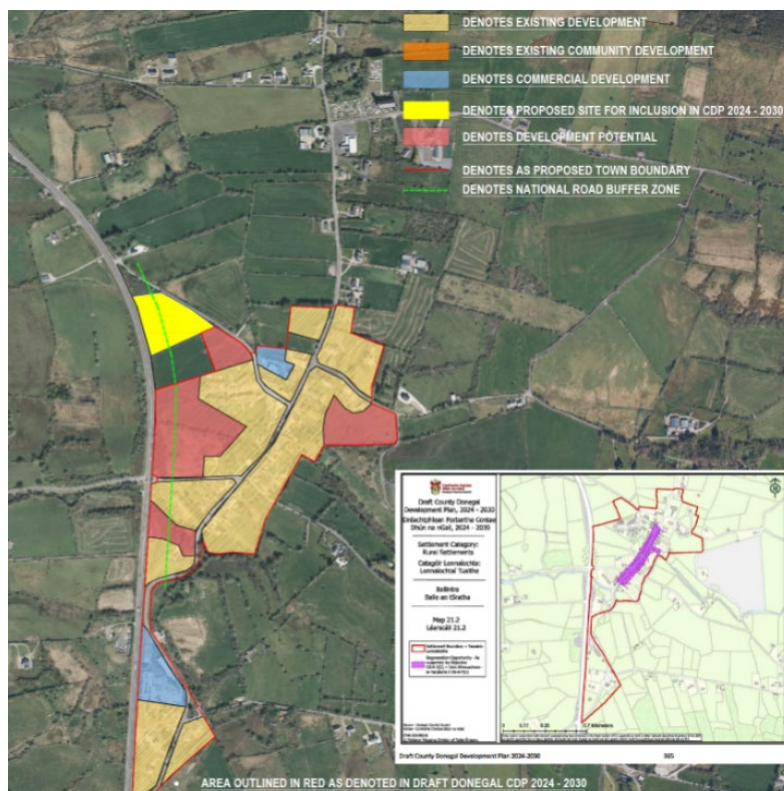
Proposal/Rationale:

Inclusion of lands adjacent to north of settlement framework.

Key statement in relation to the refusal of Planning Application Ref. No. 12/20171 (refused by DCC and An Bord Pleanala):

'To say that the development is leap frogging over other potential development land is poor planning policy. As we are all aware nobody can determine what other landowners' intentions are and therefore can only act on their own accord. In summary, they cannot wait for a person to apply for planning permission before them so that they can make their own application. Hence the reason for a town plan.'

The submission also contends: *'that when consideration is given to the proposed village boundary and the existing land uses there is very little land for development potential.'*



Also notes that *'the land is now fully serviced with both foul and public water which eliminates one of the previous reasons for refusal.'*

Planning History:

1751287: nursing home, withdrawn

1651392: nursing home, incomplete application

1651451: nursing home, incomplete application

1651255: nursing home, withdrawn

1220171: 13 dwellings, refused by DCC and An Bord Pleanala (ABP)

DCC Refusal:

Having regard to the length of the proposed connection from the site to the public sewer to the south of the site, together with the proposed use of an on-site pumping station and the distance of the said pumping station from the public sewer network and the potential issues that may arise in relation to the maintenance of the pumping system and private network given the multiple residential nature of the proposed development the Planning Authority is not satisfied that adequate provision has been made for the disposal of the foul effluent that will be generated by the proposed development. Accordingly, to permit the proposed development would be prejudicial to public health and would thereby be contrary to the proper planning and sustainable development of the area.

ABP Refusal

The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) issued by the Department of the Environment, Heritage and Local Government in May, 2009 state that above all, the overall order and sequencing of development of small towns and villages must avoid significant so called “leap-frogging” where the development of new residential areas takes place at some remove from the existing contiguous town/village in order to avoid a haphazard and costly approach to the provision of social and physical infrastructure and to give preference to undeveloped lands closest to the town. Having regard to the existing developments as well as evidence of unfinished development closer to the town centre, it is considered that to permit this residential development at a location that is removed from the village centre would militate against the requirement to develop sequentially from the village core outwards as required by the Guidelines and would, therefore, be contrary to the proper planning and sustainable development of the area.

Chief Executive’s Response:

The nearest part of the site is only 270 metres from the Main Street. A key phrase used in the refusal of ABP was the term ‘*significant leapfrogging*’. However, the distance of the leapfrogging in this case would only be 100 metres. Even in the context of a small village such as Ballintra, this is considered to be modest. Therefore, notwithstanding the decision of ABP and the number of vacant (34) and derelict (2) properties within the settlement framework, it is considered that the balance should be in favour of including this site within the boundary although it should be noted that third party consent will be required for a 100m section of footpath between the subject site and the existing footpath network.

Chief Executive’s Recommendation 21D.1:

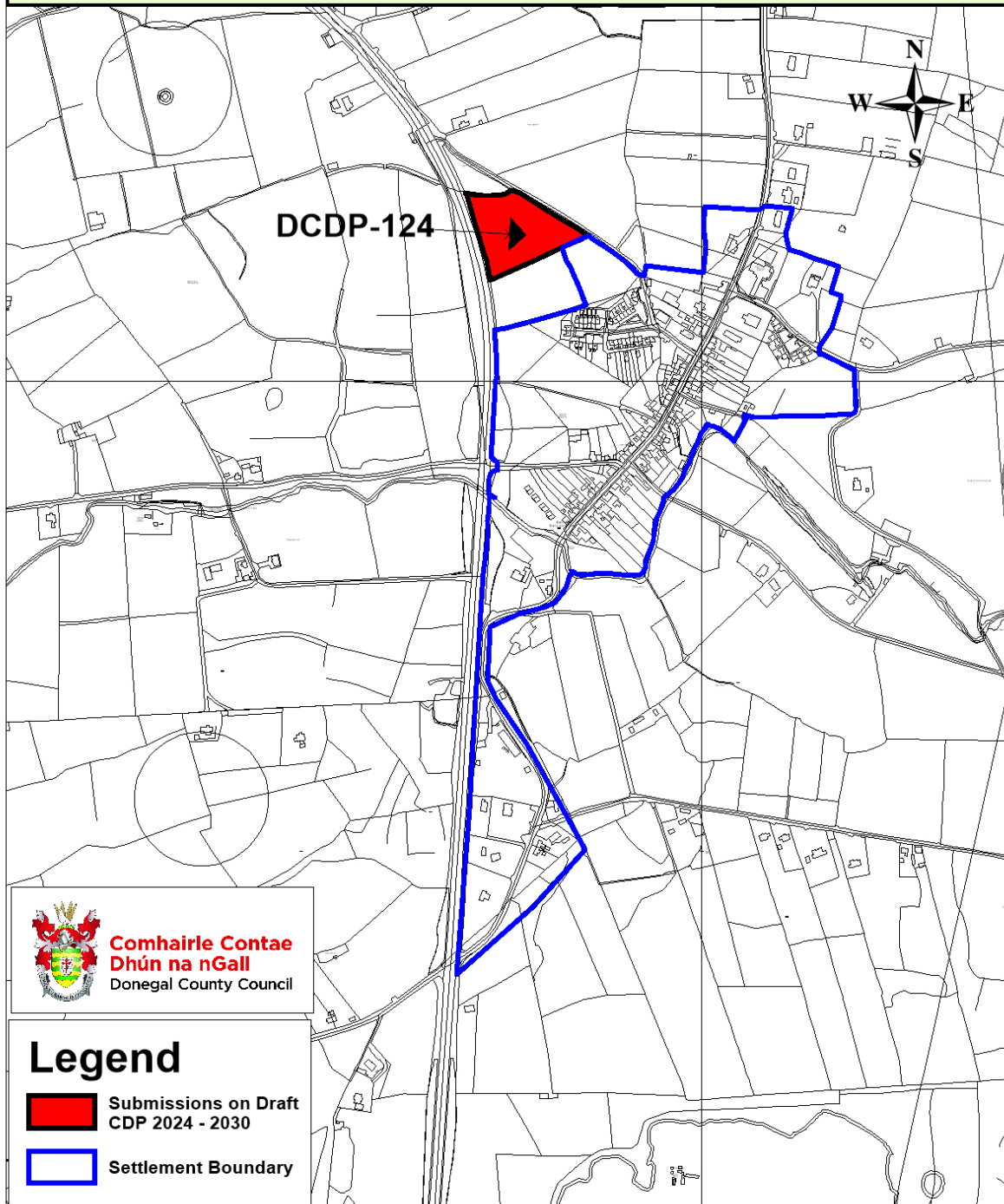
To amend the boundary as per the submission.

(This is considered to be a material alteration.)

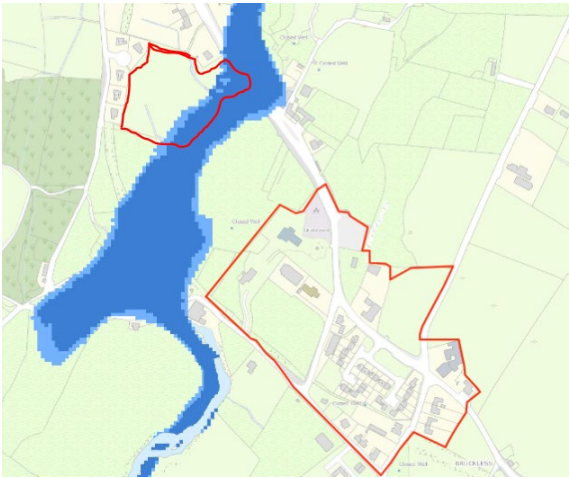
Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-124

Settlement Name: Ballintra



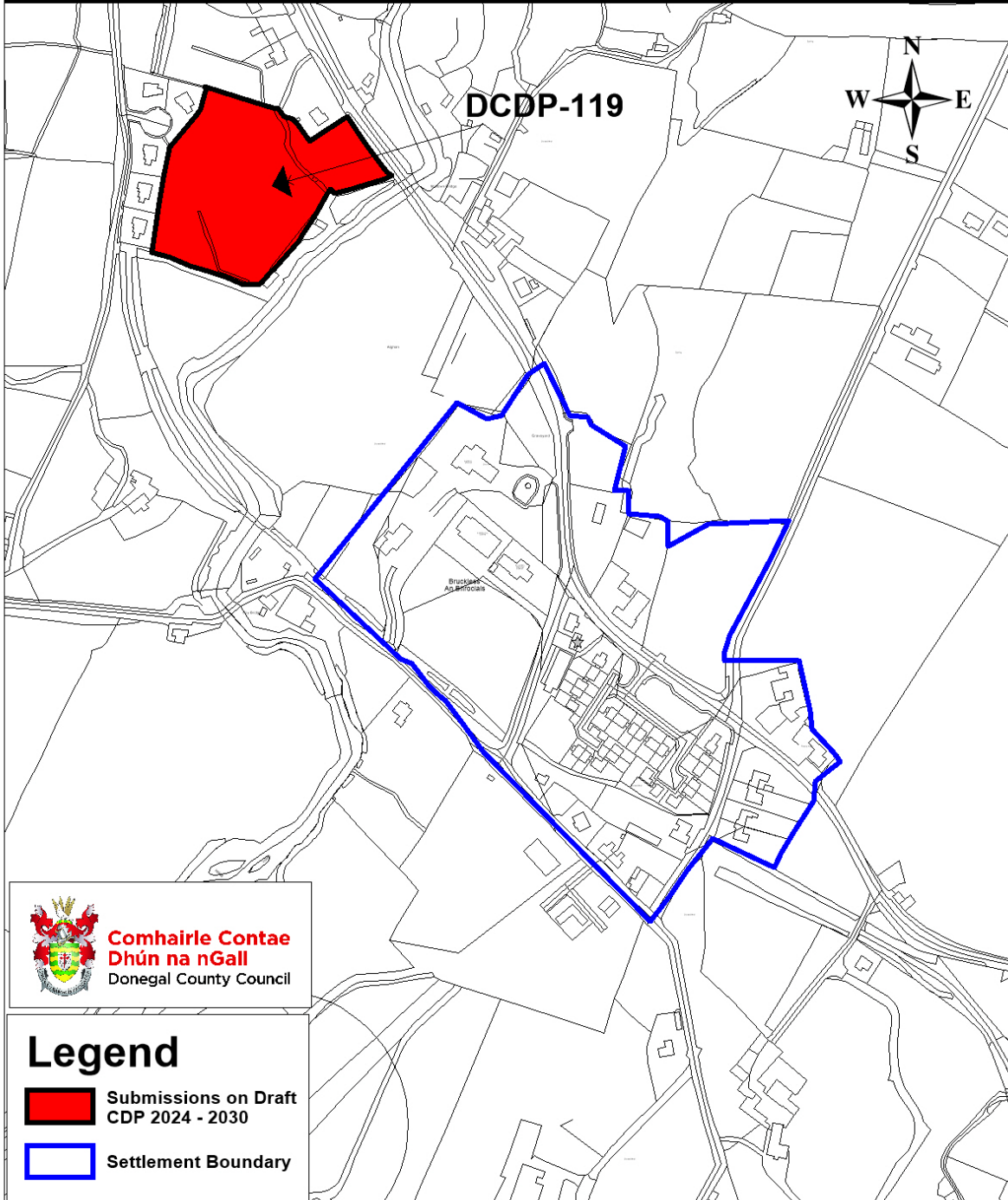
BRUCKLESS

Name/Submission Ref. No.: McCormick Properties Donegal Ltd. DCDP-119
<p>Proposal/Rationale:</p> <p>Inclusion of lands within Bruckless settlement framework boundary.</p> <p>Previous permission existed on this site, and this expired in November 2018. Some site works had been carried out.</p>
<p>Planning History:</p> <p>031080: permission approved for 14 dwellings. 0820133: change of site layout and house design approved. 10203761: change of house type approved 1250913: change of site layout and house design approved. 1250983: change of house type. 225144: completion of 10 semi-detached dwellings, incomplete application. 225168: completion of previously extended permission, withdrawn</p>
<p>Chief Executive's Response:</p> <p>The policy context has changed significantly since this site was first permitted in 2003:</p> <ul style="list-style-type: none"> – The use of communal treatment plants is no longer supported by DCC and the site would not have connection to a public sewer; – There is a much greater focus on flood risk and parts of the site have been identified as being within a flood risk area (site in red overlaid on flood risk area below);  <ul style="list-style-type: none"> – The site is physically removed from the village and located 0.2 km northwest of the settlement boundary at its closet point. The achievement of a footpath connection and lighting between the site and the village would appear to be cost prohibitive.
<p>Chief Executive's Recommendation 21D.2:</p> <p>Not to amend the Plan.</p>

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

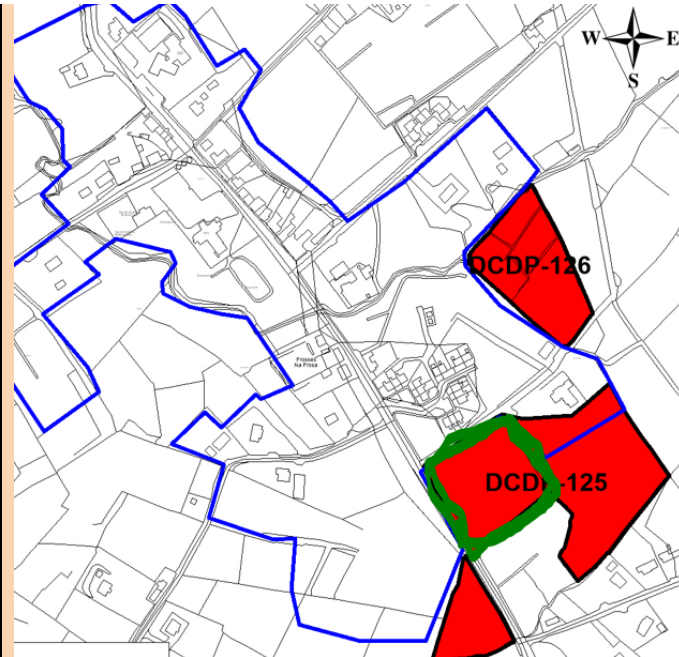
Submission No: DCDP-119

Settlement Name: Bruckless



FROSSES

Name/Submission Ref. No.: Mary Coughlan DCDP-125
<p>Proposal/Rationale:</p> <p>Inclusion of lands immediately to south of existing boundary at the south-eastern side of village. The submission contends:</p> <p><i>'The village has suffered over the past 20 years due to the lack of growth within the village. At present there is one housing development of note, the existing Coughlan Avenue development. One of the major factors that is holding development in the village is the lack of a public foul sewer. However, we feel that the land that is included with this submission are capable for the development of serviced sites with private treatment systems, or communal wastewater treatment systems. Careful design considerations will ensure that a cluster type development can be provided on the land with the end result providing much needed housing within the settlement framework for the village.'</i></p> <p>The submission also contends: <i>'when consideration is given to the proposed village boundary and the existing land uses there is very little land for development potential, in fact the development potential excluding this submission is approximately 18%. Most of the development potential is only capable of catering for single houses which result in poor land use for development with village settlements, for example 0.5acre sites for 1 house.'</i></p>
<p>Planning History:</p> <p>None</p>
<p>Chief Executive's Response:</p> <p>Having regard to the boundary on the opposite side of the regional road and to the scale of the adjacent Coughlan Ave. development, it is considered that a reduced scale of development broadly similar to the Coughlan Ave. development can be supported, particularly as the nearest part of the site to the main local services (Church, school etc) is only 280 metres away and connected with a good footpath and public lighting. Access to the site should be via the minor road immediately to the north of the site, with the road also necessitating widening to allow for two-way traffic.</p>
<p>Chief Executive's Recommendation 21D.3:</p> <p>To amend the settlement framework boundary to include the lands identified in green on the image below:</p>



(This is considered to be a material alteration.)

Name/Submission Ref. No.: Mary Coughlan DCDP-126

Proposal/Rationale:

Inclusion of lands on eastern side of village within the settlement framework boundary. The submission contends:

The rationale is exactly as per that for Subm. Ref. DCDP-125 – addressed immediately above.

Planning History:

None

Chief Executive's Response:

Having regard to the backland location of this site and the inclusion of more favourably-located lands already within the settlement framework, and to the lack of any evidence that a suitable road and footpath/street lighting could be achieved between the site and the Regional Road, this proposal is not supported.

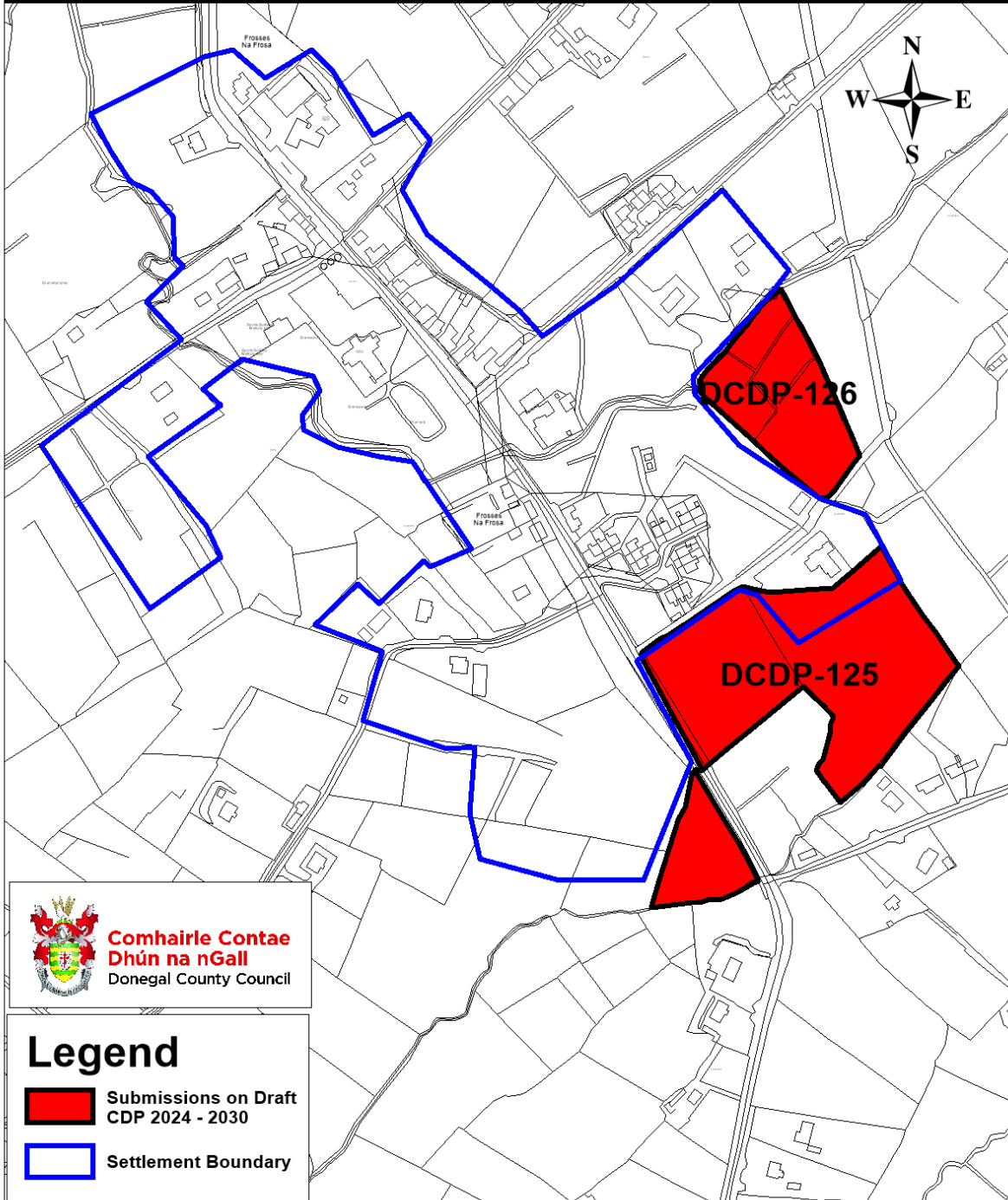
Chief Executive's Recommendation 21D.4:

Not to amend the Plan.

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-125 & 126

Settlement Name: Frosses



MOUNTCHARLES

Name/Submission Ref. No.: Daniel Gallagher Jnr. - DCDP-59
<p>Proposal/Rationale:</p> <p>Inclusion of lands immediately to east of existing boundary. The submission contends that:</p> <p><i>'The village has become over the past number of years a vibrant village with visitors coming from many surrounding areas to carry out their daily business. The availability of free parking and all essential services has resulted in Mountcharles becoming more attractive for people to carry out their daily business.'</i></p> <p><i>'Over the past 20 years there has been only two residential developments completed in Mountcharles, Cannons Court and Glor Na dTonn. In total the two developments consisted of 47 residential units, or 2.35 units per year over 20 years. Development in Mountcharles has been greatly restricted due to incapacity of the existing wastewater sewage scheme and its inability to cater for new development. However, upgrades work to the village sewage and water scheme have been approved with the works being tendered. This now results in the village being capable of catering for new development in a proper and sustainable manner.'</i></p>
<p>Planning History:</p> <p>None</p>
<p>Chief Executive's Response:</p> <p>The proposal is not supported for the following reasons:</p> <ul style="list-style-type: none"> – The development would be large in scale relative to the existing village. Indeed, it is considered that such a scale would be disproportionately large relative to the existing village. – The site includes areas of native woodlands identified on 'Ireland's National Forestry Inventory', and is within 260m of Donegal Bay SPA and Murvagh SAC. The loss of such woodlands would not be consistent with proper planning and sustainable development, particularly given the existence of more favourably located lands within the village. – The public road linking the national road with the village does not have a footpath. – There are 34 vacant properties concentrated around Main Street.
<p>Chief Executive's Recommendation 21D.5:</p> <p>Not to amend the Plan.</p>

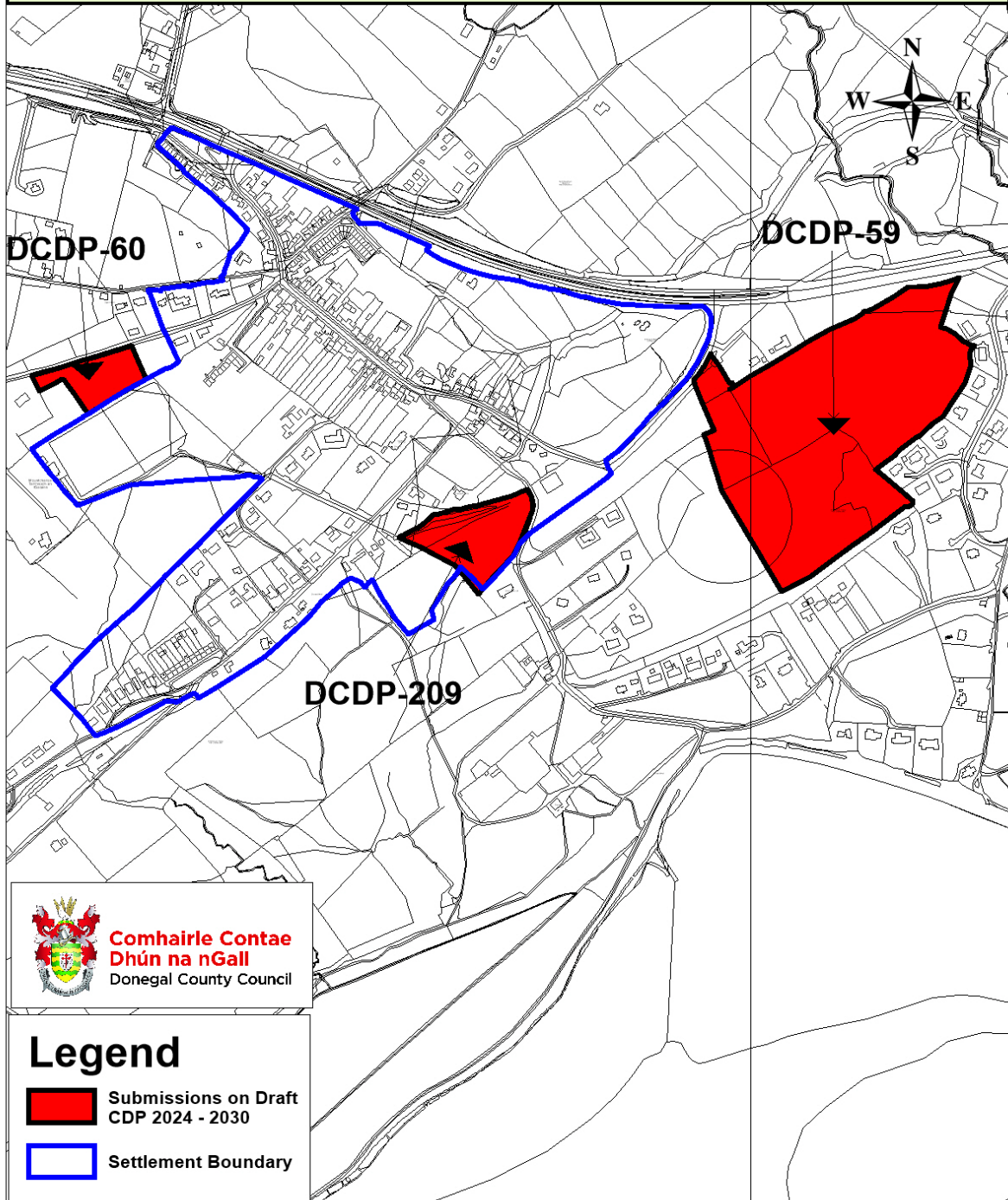
Name/Submission Ref. No.: Victor Jervis - DCDP-60
<p>Proposal/Rationale:</p> <p>Inclusion of lands to the west of the settlement framework within the settlement boundary. The rationale is exactly as per that submitted for DCDP-59.</p>
<p>Planning History:</p> <p>None.</p>
<p>Chief Executive's Response:</p> <p>The proposal is not supported principally because, for most of the distance of 200m between the site and the footpath network at the junction of the public road and the Glar na dTonn estate, two detached houses are located close to the public road in a manner that makes the achievement of a footpath and public lighting highly unlikely.</p>
<p>Chief Executive's Recommendation 21D.6:</p> <p>Not to amend the Plan.</p>

Name/Submission Ref. No.: Eddie Gallagher DCDP-209
<p>Proposal/Rationale:</p> <p>Requests inclusion of lands within the settlement framework boundary.</p>
<p>Chief Executive's Response:</p> <p>The lands are already included within the boundary.</p>
<p>Chief Executive's Recommendation 21D.7::</p> <p>Not to amend Plan.</p>

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-59, 60 & 209

Settlement Name: Mountcharles



ROSSNOWLAGH

Name/Submission Ref. No.: Dunes Property Ltd. DCDP-76

Proposal/Rationale:

Masterplan for the Dunes area of Rosstownlagh.

The main focus of the masterplan will be housing for local people and associated supporting services as the local council will not permit any further holiday homes in the village. The local character and typology is generally detached housing of single and 1.5/2 storeys. The tallest building is the Sandhouse Hotel which stands at 3.5 storeys in height. The masterplan will reflect this local character and density with predominantly detached dwellings with a mix of semi-detached in the core of the masterplan. A new commercial/retail centre will be introduced next to the Sandhouse Hotel of a similar scale and height. This will be supported with some central landscaping at the heart of the Village. This masterplan will increase the local population from circa 200 residents to +700 therefore we feel it is important establish a village centre with provision of additional food and retail offerings.

Two masterplan options have been developed.

Option-1 explores the potential of a central green corridor with cul-de-sac type housing bordering the site.

Option-2 explores a number of smaller pockets of green space integrated into the housing zones linked to a main central green space. This option helps to create a micro community for families within the area. Both options focus on the creation of active street frontages and the provision of as much shared space as possible to contribute to the long-term sustainability of the area. The sand dunes along the beach frontage is a unique feature of Rosstownlagh therefore it was considered that development should be focused on the western section of the road leaving this area uninterrupted. The views focus on the retail/commercial zone of the masterplan which borders a generous landscaped centre supporting the increasing population of Rosstownlagh.

ROSSNOWLAGH: VILLAGE MASTERPLAN





Planning History:

None relating to development of this scale.

Chief Executive's Response:

The submission proposes 'residential' (total 207 units), 'mixed use' and commercial areas. This scale of development must be considered in the context of the Core Strategy. In the Draft Plan Core Strategy, Rossnowlagh is identified as a 'Rural Settlement'. Settlements in this layer of the Core Strategy are not allocated individual settlement growth targets on the basis that the anticipated organic growth in these settlements will be modest in all cases. The layer above, 'Service Towns' (Lifford, Carndonagh, Ballyshannon, Bundoran, Raphoe, Bunbeg/Derrybeg and Milford)t, are given individual targets. The revised target for each as recommended in Section 3 of this Report is 172 units. Thus the proposed development would be significantly in excess of the proposed allocation for the settlements in the higher layer.

Rosstownlough is identified in Map 6.3.1 of the Draft Plan as an 'Area Under Strong Holiday Home Influence'.

Of note is the lack of social amenities in the village (eg. schools, medical services) and the absence of any such proposals in the submission.

In summary, the priority has to be meeting genuine housing need for permanent occupancy of different tenures. The proposed development does not exhibit the characteristics of a project that could meet long-term housing needs in accordance with the objectives of the Government's 'Housing for All' policy.

Chief Executive's Recommendation 21D.8:

Not to amend the Plan.

GLENTIES MD AREA SETTLEMENT FRAMEWORK SITE-SPECIFIC SUBMISSIONS

The settlements that are the subject of such submissions are listed below:

- Burtonport
- Bunbeg/Derrybeg
- Falcarragh
- Creeslough
- Dunfanaghy
- Loughanure

BURTONPORT

Name/Submission Ref. No.: DCDP-101

Michael Boyle

Proposal/Rationale:

A Marine Tourism project comprising a 20–25-bedroom Hotel (Phase One), and mixed-use quality homes/apartments in Phase Two. (The submission identifies the site as per the image below:)

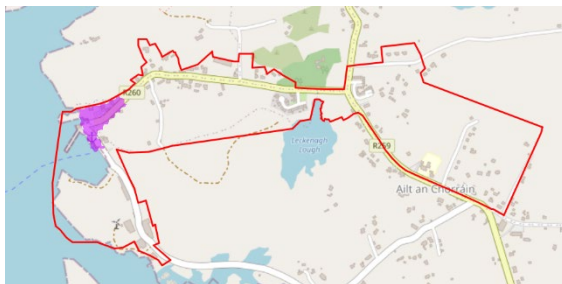


One of the major findings of a recent Blueway report is the lack of variety, quantity and quality accommodation in West Donegal, Burtonport and Árainn Mhór areas. The western seaboard and the offshore islands have witnessed increased visitor activity, assisted by the successful marketing of the Wild Atlantic Way. An estimated increase of 30,000 visitors to Árainn Mhór over the coming years means accommodation will have to increase in capacity or the social and economic benefit to the region will be lost. The quality and variety of this increase is vital. Whilst Burtonport and Árainn Mhór Island have benefitted from this uplift, the change has been a gradual one and more needs to be done to accommodate and house the growing numbers and show the true potential Burtonport has to offer. The economy of Burtonport and the islands was traditionally based in the fishing industry which has been in decline since the 1980s and has reduced family incomes and opportunities for employment.

Planning History: No previous history

Chief Executive's Response:

The subject area is already included within the Burtonport Settlement Framework Boundary in the Draft CDP. (refer to image below):



Construction work on the Burtonport wastewater treatment plant is progressing on-site. Therefore, the principle of development is open to consideration and subject to the requirements of the Act in

terms of development management. In this regard, the proposed development would require detailed consideration of significant issues, including:

- proximity to Rutland Island and Sound SAC;
- proximity to the industrial area;
- the inherent sensitivities of this rocky coastal outcrop; and
- a modest part of the site falling within Flood Zone A and B as identified in the SFRA:-



Furthermore, whilst the submission does not explicitly refer to holiday homes when referencing 'mixed-use quality homes/apartments in Phase Two', it should be noted that any proposals for the inclusion of holiday homes would be subject to compliance with policy UB-P-2 (requires that the development would not result in the total no. of existing and permitted holiday homes in the settlement exceeding 20% of the total existing and permitted housing stock).

Based on the above, it is considered that the most appropriate approach in this case is to leave the Draft Plan unchanged.

Chief Executive's Recommendation 21G.1:

Not to amend the Plan.

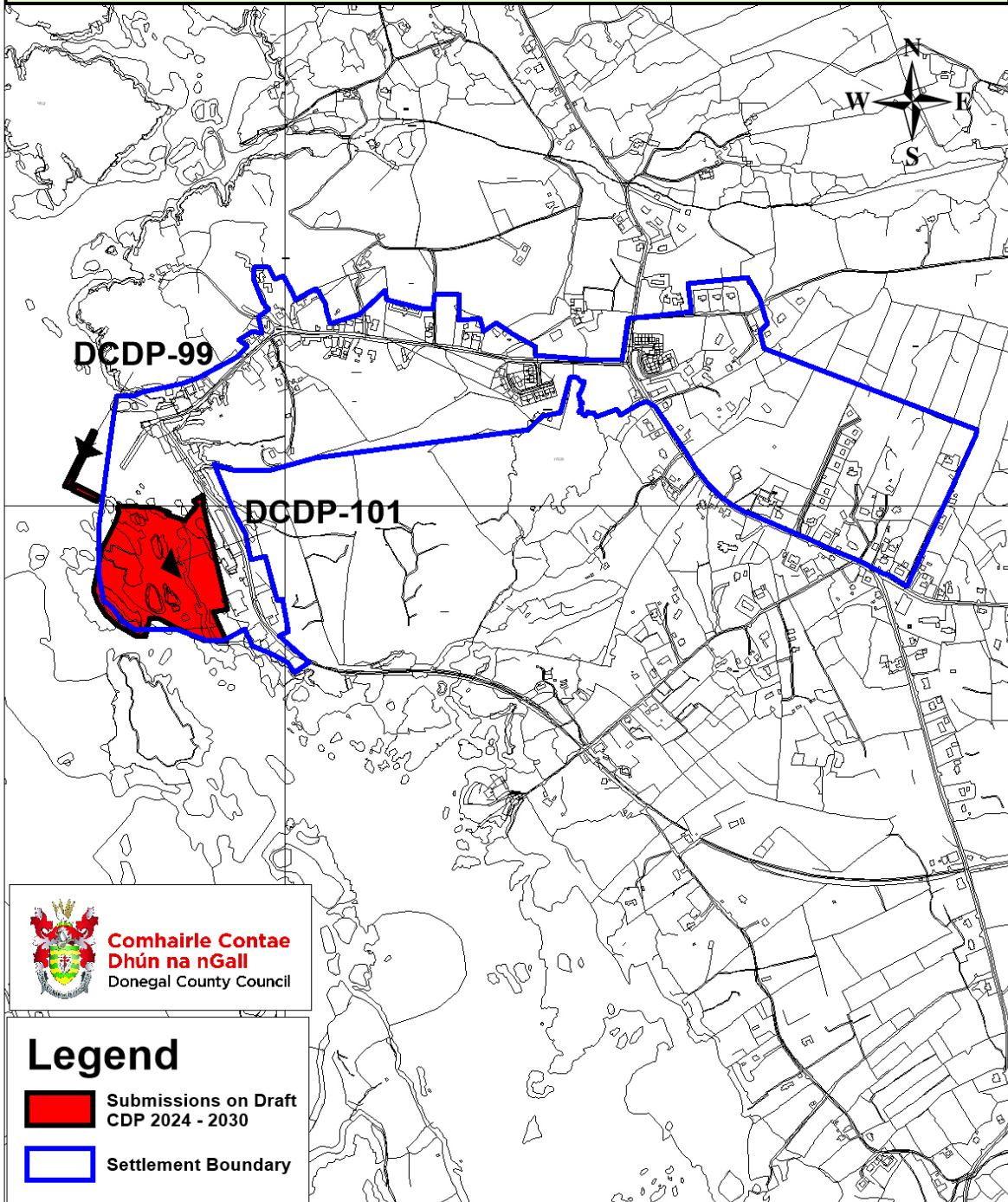
Name/Submission Ref. No.: Burtonport Harbour Committee DCDP-99

Burtonport Committee Proposal – please refer to Section 14.

Draft County Development Plan, 2024-2030: Chief Executive’s Report on Submissions and Observations

Submission No: DCDP-99 & 101

Settlement Name: Burtonport

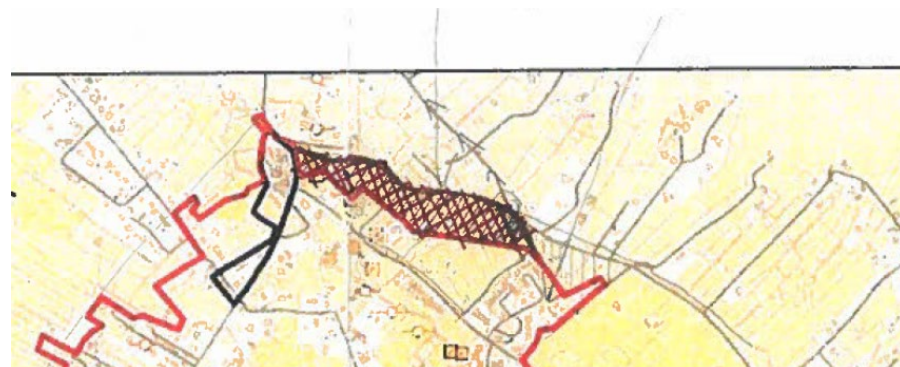


BUNBEG/DERRYBEG**Name/Submission Ref. No.: DCDP-1**

John O'Donnell

Proposal/Rationale:

Extension of the Bunbeg-Derrybeg settlement framework boundary at its northern end. (The relevant part of the map attached with the submission is inserted below; the area subject of the request is shown hatched, and the existing Draft Plan boundary identified by the red line).



Boundary should follow the line of physical features such as in this case, the existing stream/road. This would remove any degree of confusion over the limits of the settlement boundary when making of a planning application.

Planning History:

10/30184 – Hughie O'Donnell – permission for a shed/garage (withdrawn).

Chief Executive's Response:

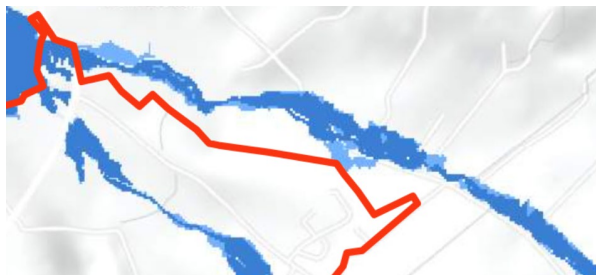
Whilst the lands are on the periphery of an already dispersed settlement, also of relevance is the site's proximity to:

- St. Mary's Church
- Scoil Mhuire; and
- the local shops at the junction of the public roads to the east.

The subject lands are already connected to these local facilities by public footpath and public lighting.

Whilst the lands are in an area designated as 'High Scenic Amenity', in reality the area has been significantly compromised already with manmade structures. The site is not affected by Natura 2000 designations.

The northern edges of the lands are within Flood Zones A and B within which residential development should not be supported in accordance with Flood Risk Guidelines.

**Chief Executive's Recommendation 21G.2.:**

To amend the boundary to include the lands identified in the submission, subject to the exclusion of those lands falling within Flood Zones A and B.

(This is considered to be a material alteration.)

Name/Submission Ref. No.: DCDP-69

Bernard Greene

Proposal/Rationale:

Extension of the Bunbeg-Derrybeg settlement framework boundary to include lands (1.22Ha) to the north of the identified centre (nb. a small portion of the landowner's site is contained within the Draft Plan settlement framework boundary).

There is an increased need for housing in the area and there has been a lack of housing delivery targets over the course of the existing CDP 2018-2024.

The landholding is contained within the catchment area of the pilot wastewater treatment upgrade works being completed by Irish Water. Site is served by the improved broadband service which would meet the needs/requirements of new developments.

Planning History:

The site abuts Gweedore Bay and Islands SAC and is an Area of Especially High Scenic Amenity (HAS).

Planning applications over the period 2002-2009:

02/2142 – SITE DEVELOPMENT WORKS INCORPORATING 16 NO. DWELLINGS, ACCESS ROAD AND CONNECTION TO COMMUNAL SEWAGE TREATMENT PLANT. Permission granted for 16 no. dwellings and connection to communal treatment sewage plant.

06/30775 - DEVELOPMENT FOR HOUSE TYPES (on foot of planning register number 02/2142) FOR SITE DEVELOPMENT WORKS. THE DEVELOPMENT WILL CONSIST OF 16 NO. DWELLINGS. Permission was granted and subsequently refused by An Bord Pleanála.

09/30223 - ERECTION OF 10 NO. SEMI-DETACHED DWELLING HOUSES AND 1 NO. DETACHED DWELLING HOUSE TOGETHER WITH A COMMUNAL SEWAGE TREATMENT SYSTEM AND SAND POLISHING FILTER WITH ALL ASSOCIATED SITE WORKS INCLUDING THE PROVISION OF A NEW ACCESS ROAD. ALSO TO INCLUDE FOR 2 NO. PROPOSED ADJOINING DWELLING HOUSES (PLANNING REF: 08/31051) TO BE CONNECTED TO THE PROPOSED SEWAGE TREATMENT PLANT.

Permission was refused by DCC on the following grounds;

- a. Lack of adequate sewage treatment supply in the area.
- b. adequate or effective disposal of effluent generated from the proposed development in accordance with the requirements of the EPA Waste Water Treatment Manual: Treatment Systems for Small Communities, Business, Leisure Centres and Hotels,
- c. Potential impact of the development on Natura designated sites,
- d. Concern over the proposed access and its potential to give rise to a traffic hazard.

Chief Executive's Response:

The site is reasonably proximate to the services (Spar etc.) located to the south, which area is identified in the Settlement Framework as Town Centre. The local church and school is also within walkable distance. The site is already connected to these local facilities by public footpath and public lighting. The principle of including within the settlement framework boundary does therefore have merit.

A review of the planning history of the site and the flood risk mapping does identify notable constraints:

- Public Health: The reference to the UE/DCC Pilot Project is noted. However, it is unclear if this project could service the subject lands at this time. Planning permission was refused by DCC (09/30223) partly on the grounds of concerns around effluent treatment and disposal).

- Traffic Safety: Planning permission was refused by both DCC (ref 09/30223) and An Bord Pleanála (ref 06/30775) partly over the proposed access and its potential to give rise to a traffic hazard (the ABP decision is pasted in below for ease of reference).

REASONS AND CONSIDERATIONS

The site is located such that the proposed access to it joins the R257 Regional Road in a hollow where sight distance is severely restricted in either direction by reason of substandard horizontal and vertical alignment. It is considered that the traffic movements likely to be generated by the proposed development would interfere with the safety and free flow of traffic along this road, which is a regional road with significant function of providing local access as a regional distributor. The proposed development would, therefore, endanger public safety by reason of creating a traffic hazard.

- Flood Risk: Part of the western side of the site does lie within Flood Zones A and B as identified in the SFRA.
- Biodiversity: The site is immediately adjacent to the Gweedore Bay and Islands SAC, and Gweedore Bay and Islands Proposed Natural Heritage Area.

Having regard to these issues, and to the existence of other more suitably-located development opportunities within the established settlement framework, it is considered that the inclusion of the proposed site would not constitute orderly development, notwithstanding the agent's contention in the submission that these are technical issues that may be surmountable at some point in the future.

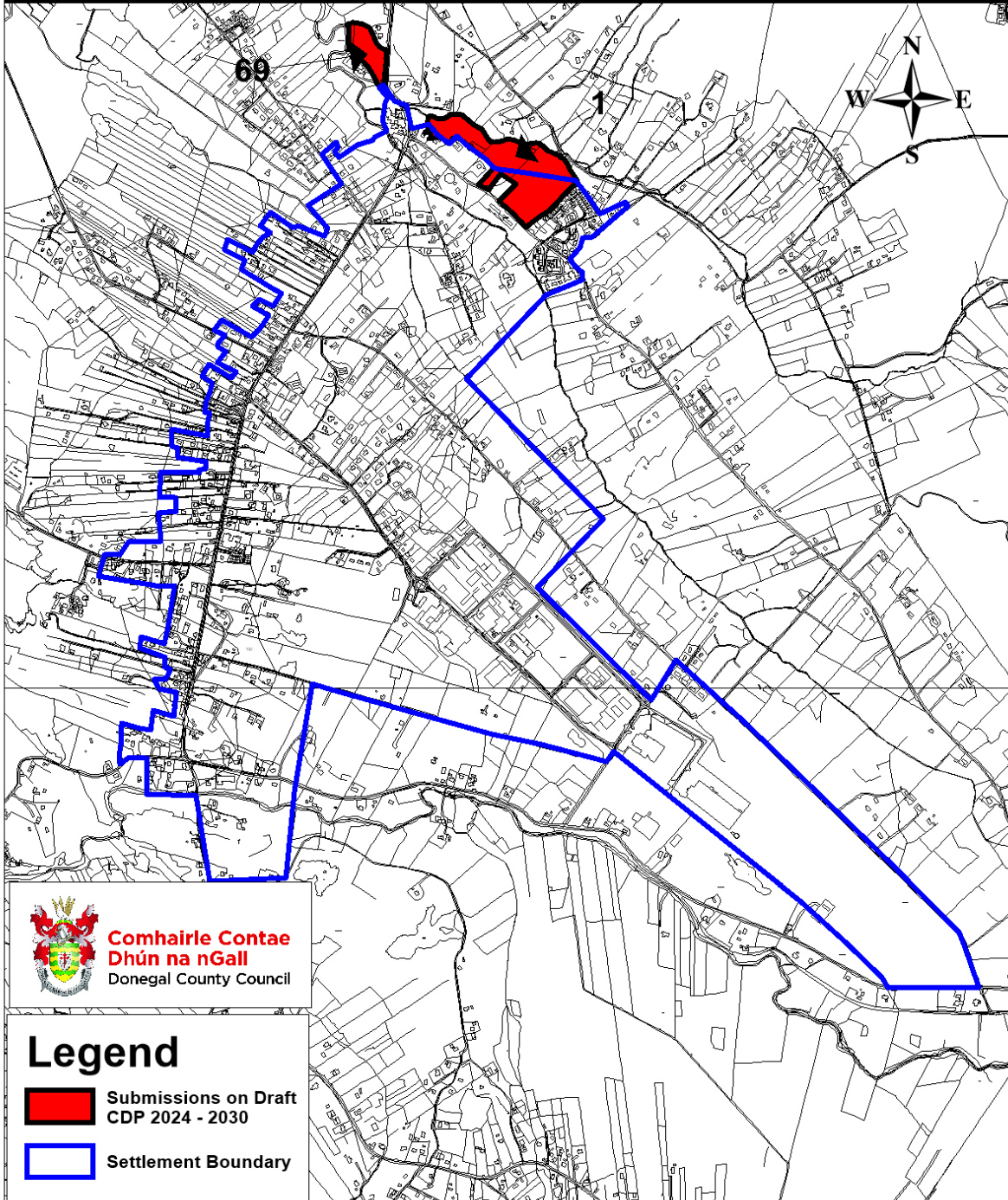
Chief Executive's Recommendation 21G.3:

Not to amend the boundary.

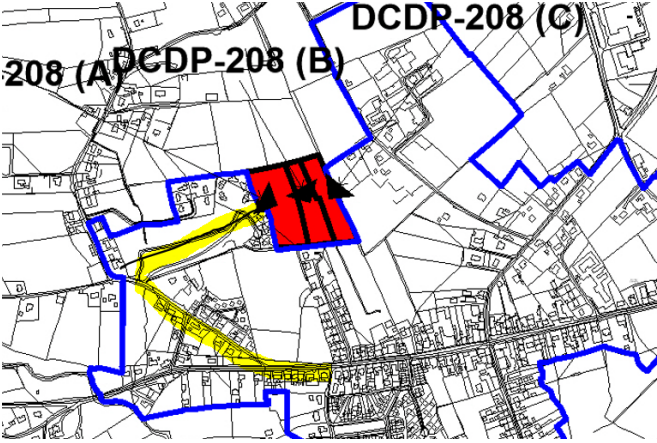
Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-1 & 69

Settlement Name: Bunbeg - Derrybeg



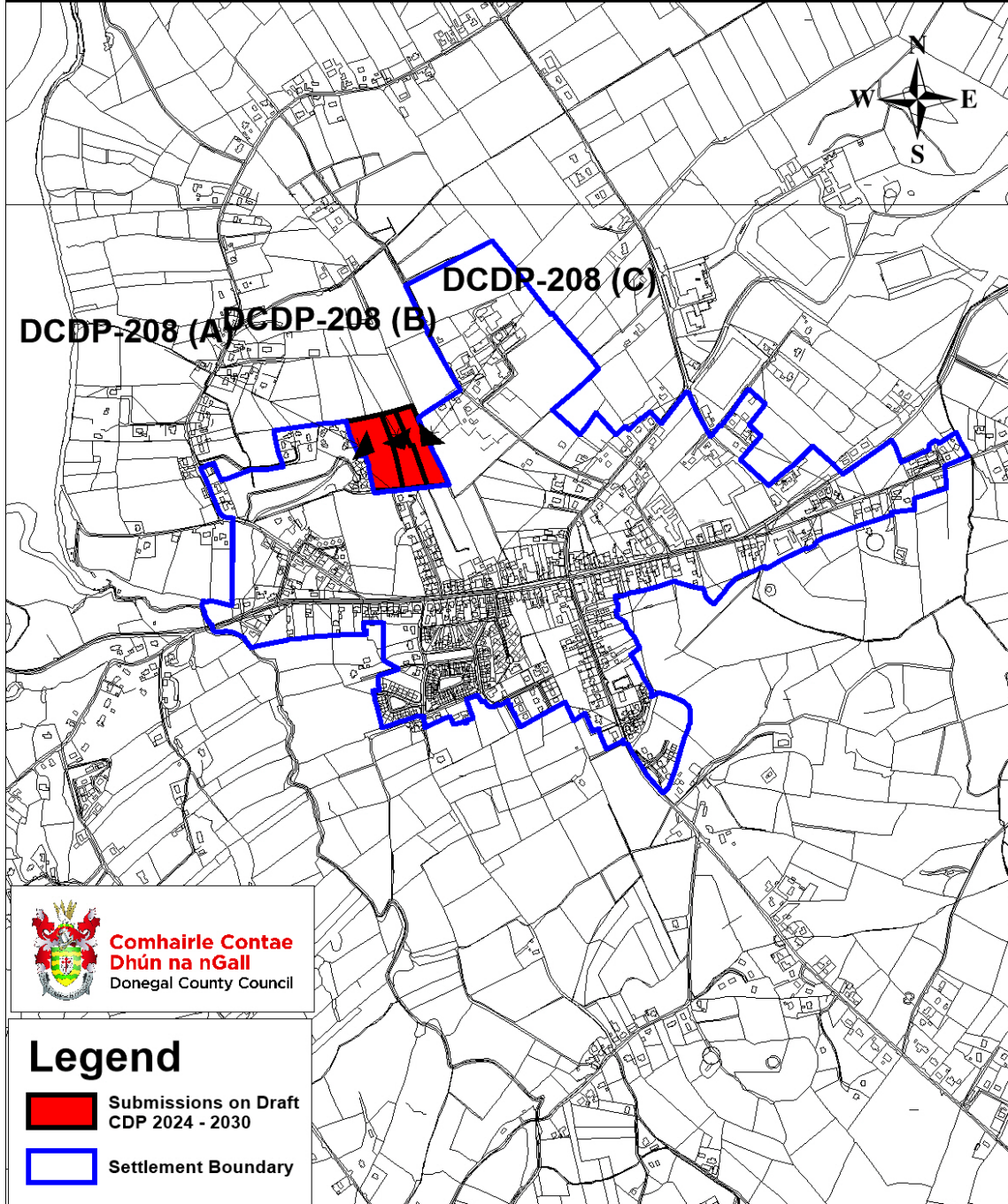
FALCARRAGH

<p>Name/Submission Ref. No.: DCDP-208</p> <p>Seosamh O'Ceallaigh, Madge Curran & Michael Geaney</p>
<p>Proposal/Rationale:</p> <p>Extension of the Falcarragh settlement framework boundary. No rationale provided.</p>
<p>Planning History:</p> <p>No planning history.</p>
<p>Chief Executive's Response:</p> <p>There is no direct route (vehicle or walking) to the town centre through the adjacent Creag an Easa development to the south as this development ends in a cul-de-sac with the defined curtilage of the northernmost house. Therefore, the only route to the centre for both vehicles and pedestrians/cyclists is to the west through the Radharc na Tra development, and then on to the public road (identified in yellow in the image below):</p>  <p>Both the Radharc na Tra development and the public road are deficient in terms of footpath and lighting. Furthermore, whilst this deficiency might be addressed within the Radharc na Tra development, it does not appear to be possible to provide the required infrastructure on the public road due to the narrowness of the road and the curtilages of various properties being immediately adjacent to the road edge.</p> <p>The proposed lands are contained within the Ballyness Bay Proposed Natural Heritage Area and immediately adjacent to the Falcarragh to Meenlaragh Special Protection Area.</p> <p>Having regard to the issues around the connectivity of the proposed site to the centre, together with the natural heritage issues also referenced above, the recommendation is not to support this proposal.</p>
<p>Chief Executive's Recommendation 21G.4:</p> <p>Not to amend the boundary.</p>

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-208

Settlement Name: Falcarragh



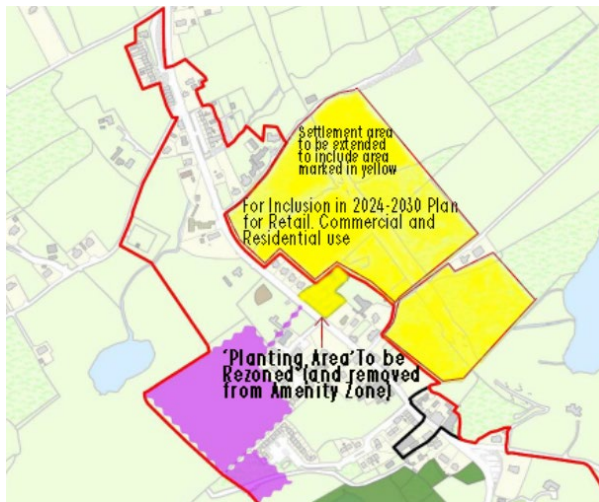
CREESLOUGH

Name/Submission Ref. No.: DCDP-100

Conrad Gibbons

Proposal:

1. Rezoning of area (adjacent to the N56 and north of St Michaels chapel car park) from 'Amenity' to 'Retail, Commercial or Residential' (area is referred to as 'Planting Area' in the image below reproduced from the submission).
2. Extend the settlement framework boundary to include lands marked yellow on submitted Map for 'Retail, Commercial or Residential' use.



Has been a strong focus on developing the west and south of the village in the last two decades or so. It is arguable that the village has become imbalanced/skewed in those directions only, with little if any development to the east side of the village.

Planning History:

No previous history

Chief Executive's Response:

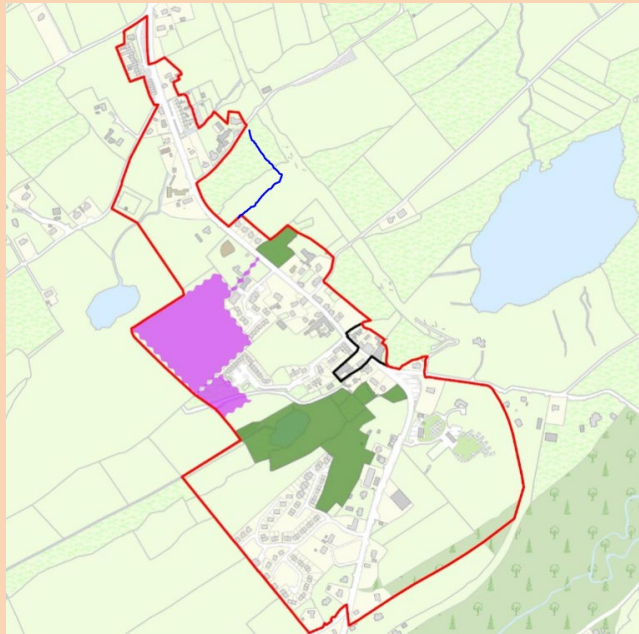
The area of the 'yellow site' is circa 12.5 hectares. At a density of 25 units per hectare, this would in theory accommodate 312 units. Such a scale of development would be entirely disproportionate to the scale of the existing settlement and is highly unlikely to be realised in any event over the course of several plan iterations. Of note also is that the site is bisected by the former railway line. There would be no justification for including lands outside of/to the north-east of the line.

A revised boundary to accommodate only those lands 'inside of/to the south-west of the railway line has also been considered but also presents significant issues in terms of: scale; the substandard nature of the minor roads off the N56 at the western end and close to the eastern end of the lands; the N56 road frontage outside of the area zoned 'Amenity' where there is no hard shoulder/footpath and where mini-bollards have been erected; and the absence of any direct active travel route to the centre of the village for any development on the eastern side of the submitted areas.

However, it is considered that a proportionate boundary as per the recommendation below can be supported, subject to access being achieved off the minor road to the west with two-way road width being achieved along the north-western as per the image below.

Chief Executive's Recommendation 21G.5:

Extend the boundary to include the area outlined in blue as per below.



(This is considered to be a material alteration.)

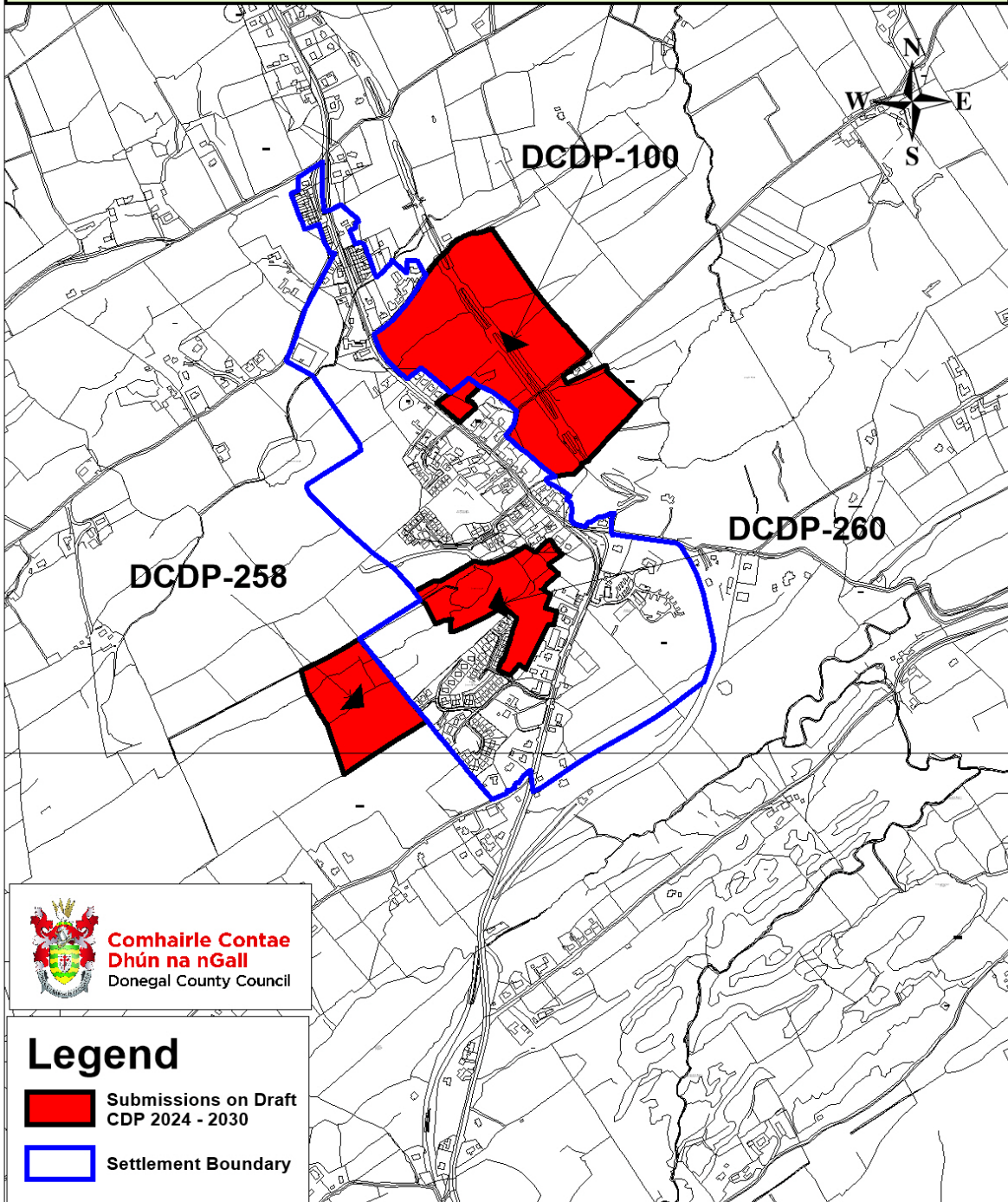
<p>Name/Submission Ref. No.: DCDP-258</p> <p>Charles Roarty</p>
<p>Proposal/Rationale:</p> <p>This submission requests the lands highlighted on the Map below to be included within the settlement framework boundary of Creeslough. This proposed additional lands are in; a. stronger rural area, and b. Area of High Scenic Amenity (HSA) on the south-western side of the village.</p> <p>The submission identifies a need for additional multiple residential developments in the area based on need and a National policy call for serviced sites for the indigenous population. On the basis of location on lands which abut the proposed settlement boundary it would promote compact sequential growth for the village.</p> <p>It sets out that the identified lands are favourable on the grounds of;</p> <ul style="list-style-type: none"> a. Currently serviced by 6m wide carriage way, footpath and public lighting b. Access onto the N56 within the 60km speed limit zone c. Lands are slightly elevated which would provide for a gravity flow for sewage to the public wastewater treatment plant.
<p>Planning History:</p> <p>No previous site history</p>
<p>Chief Executive's Response:</p> <p>Having regard to more favourably located sites within the existing boundary sufficient to meet the needs of the village, including the lands immediately to the east of the subject site, this proposal is not supported.</p>
<p>Chief Executive's Recommendation 21G.6:</p> <p>Not to amend the boundary.</p>

<p>Name/Submission Ref. No.: DCDP-260</p> <p>Charles Roarty</p>
<p>Proposal/Rationale:</p> <p>This submission requests for the reduction in size to the lands identified as 'Amenity Area' in the Draft Settlement Framework boundary for Cresslough village, to be reconsidered the purposes of providing residential development on the south-western side of the village.</p> <p>The submission sets out the need for increased residential type developments in Creelough based on increases in the primary school numbers and the growth in housing developments/population within the current village boundary.</p> <p>It states that the provision of the Regeneration Project which is being led out by Donegal County Council will in effect provide an amenity area for residents.</p> <p>It sets out that the town centre location of the proposed lands (within 900m of town centre) which are contained within the proposed settlement boundary, would promote compact sequential growth for the village.</p>
<p>Planning History:</p> <p>No site history.</p> <p>Adjacent lands;</p> <p>21/50265 - ERECTION OF 11 NO. RESIDENTIAL UNITS WITH CONNECTION TO PUBLIC SEWER AND ALL ASSOCIATED ANCILLARY SITE DEVELOPMENT WORKS - granted</p>
<p>Chief Executive's Response:</p> <p>Having regard to the availability of other sites within the existing boundary and as recommended above, the loss of the amenity is considered to be unnecessary, notwithstanding the favourable location of the lands as referenced in the submission.</p>
<p>Chief Executive's Recommendation 21G.7:</p> <p>Not to amend the amenity zoning.</p>

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-100, 258 & 260

Settlement Name: Creeslough



DUNFANAGHY

Name/Submission Ref. No.: DCDP-46 and DCDP-191

Tommy & Sadie Doherty
Shane McMenamin

Proposal/Rationale:

These submissions request the lands highlighted on the Map below to be included within the settlement framework boundary of Dunfanaghy. This proposed additional lands are in; a. stronger rural area, and b. Area of High Scenic Amenity (HSA) on the south-western side of the village.

The submission identifies a need for additional residential developments in the area based on an increased need for accommodation from the tourism sector and the uptake of development over the period 2018-2024.

It sets out that the identified lands are favourable on the grounds of;

- a. Location/access potential onto the N56 and within the defined 60km/h and local access road (L-3233-1
- b. Lands present as in-fill site/greenfield
- c. Convenient location to local amenities
- d. Footpath connection to town centre
- e. Lands previously formed part of the town boundary

Planning History:

- 00/2914 - ERECTION OF 30 NO.SOCIAL HOUSING UNITS, 1 NO.WARDENS ACCOMMODATION , 1 NO. COMMITTEE ROOM, 1 NO. ORATORY INCLUDING CARPARKING AND ANCILLARY FACILITIES AND PURAFLO SEWAGE TREATMENT SYSTEM– granted
- 02/3290 (OPP) - ERECTION OF 6NO. DETACHED DWELLINGS WITH DETACHED GARAGES AND COMMUNAL SEWAGE TREATMENT PLANT WITH CONNECTION INTO EXISTING PUBLIC SEWER – granted
- 03/3644 - ERECTION OF 8 NO DETACHED DWELLINGS AND COMMUNAL SEWAGE TREATMENT PLANT WITH CONNECTION INTO EXISTING PUBLIC SEWER – granted
- 04/3163 - ERECTION OF 5 NO DETACHED DWELLINGS CONSISTING OF TWO NO HOUSE TYPES WITH DETACHED GARAGES AND COMMUNAL SEWAGE TREATMENT PLANT WITH CONNECTION INTO EXISTING PUBLIC SEWER – granted
- 04/3079 - ERECTION OF 5 NO DETACHED DWELLINGS CONSISTING OF TWO NO HOUSE TYPES WITH DETACHED GARAGES AND COMMUNAL SEWAGE TREATMENT PLANT WITH CONNECTION INTO EXISTING PUBLIC SEWER
- 05/30364 - ERECTION OF 11 NO DWELLING HOUSES AND 10 NO DOMESTIC GARAGES WITH ASSOCIATED LANDSCAPING, SITE WORKS AND A COMMUNAL SEWERAGE TREATMENT PLANT WITH CONNECTION TO THE EXISTING PUBLIC SEWER. THE DEVELOPMENT COMPRISES OF 2 NO PAIRS OF SEMI-DETACHED DWELLINGS AND 7 NO DETACHED DWELLINGS. THE SITE HAD PREVIOUSLY BEEN GRANTED PLANNING PERMISSION FOR 8 NO DETACHED DWELLINGS (REF NO 03/3644) – granted
- 06/30605 - CONSTRUCTION OF 26 NO. SEMI-DETACHED DWELLINGS WITH CONNECTION TO PUIBLC SEWER AND CONECTION INTO UPGRADED, PREVIOUSLY APPROVED SEWERAGE TREATMENT PLANT AND PUMPING STATION REF 04/3163 – refused on basis of exceeding the population quotas and the balance of permanent to holiday home development in Dunfanaghy.
- 06/30911 - ERECTION OF THREE NO. DWELLING HOUSES WITH CONNECTION TO EXISTING WASTEWATER TREATMENT PLANT. – refused

- 07/30543 - RELOCATION OF APPROVED TREATMENT PLANT AND PUMPING STATION (REF 04/3163) AS REQUIRED BY REF 06/31254 FOR 26 NO. SEMI-DETACHED PERMANENT DWELLINGS – granted
- 07/30296 - RECTION OF 14 NO. DWELLING HOUSES WITH ASSOCIATED SITEWORKS, LANDSCAPING AND A COMMUNAL SEWERAGE TREATMENT PLANT WITH CONNECTION TO EXISTING PUBLIC SEWER. THE DEVELOPMENT COMPRISES OF 3 NO. PAIRS OF SEMI-DETACHED DWELLINGS & 2 NO. BLOCKS OF 4 NO. TERRACED DWELLINGS. THE SITE HAS PREVIOUSLY BEEN GRANTED PLANNING PERMISSION FOR 11 NO. DWELLINGS REF. 05/30364 - granted
- 07/30453 - RELOCATION OF APPROVED TREATMENT PLANT AND PUMPING STATION (REF 04/3163) AS REQUIRED BY REF 06/31254 FOR 26 NO. SEMI-DETACHED PERMANENT DWELLINGS – granted
- 09/30241 - NSTALLATION ON SITE OF A PACKAGE TREATMENT SYSTEM WITH PUMP STATION TO SERVE DWELLINGS GRANTED UNDER PLANNING REF: 07/30296 AND RETAIL UNITS AND APARTMENTS PREVIOUSLY GRANTED UNDER PLANNING REF: 07/31451 WITH CONNECTION TO MAIN SEWER - granted

Extensive history on the entirety of the site. Previous refusals were based on the proposed development exceeding the holiday home/permanent home quota.

Development has not taken place on site.

The site frontage along the N56 is contained within the 80km/h speed limit one.

Chief Executive's Response:

Having regard to more favourably located sites within the existing boundary sufficient to meet the needs of the Dunfanaghy, and the narrow carriage width of Old Cottage Road on the eastern side of site connecting the site with the village centre, this proposal is not supported.

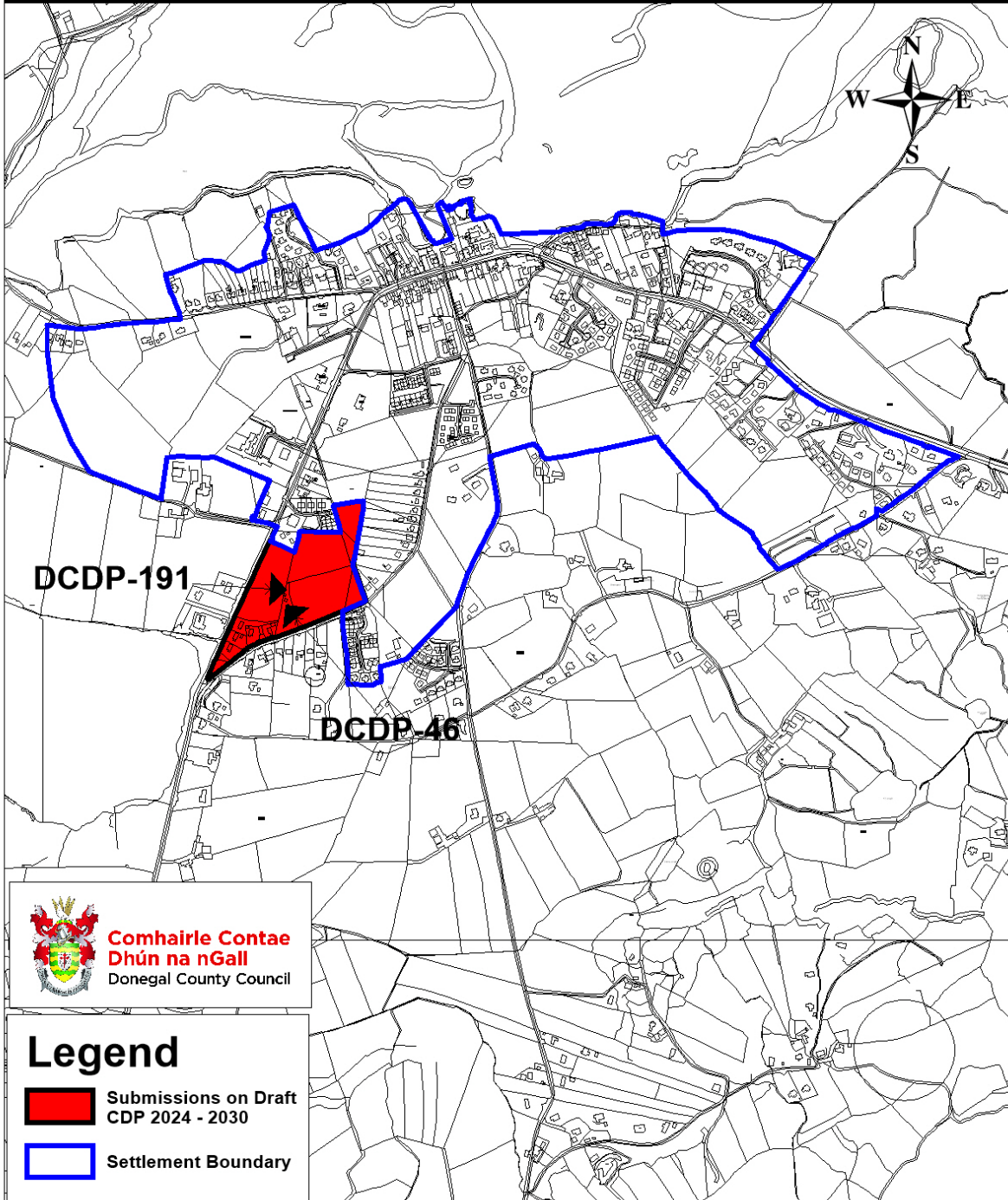
Chief Executive's Recommendation 21G.8:

Not to amend the boundary.

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

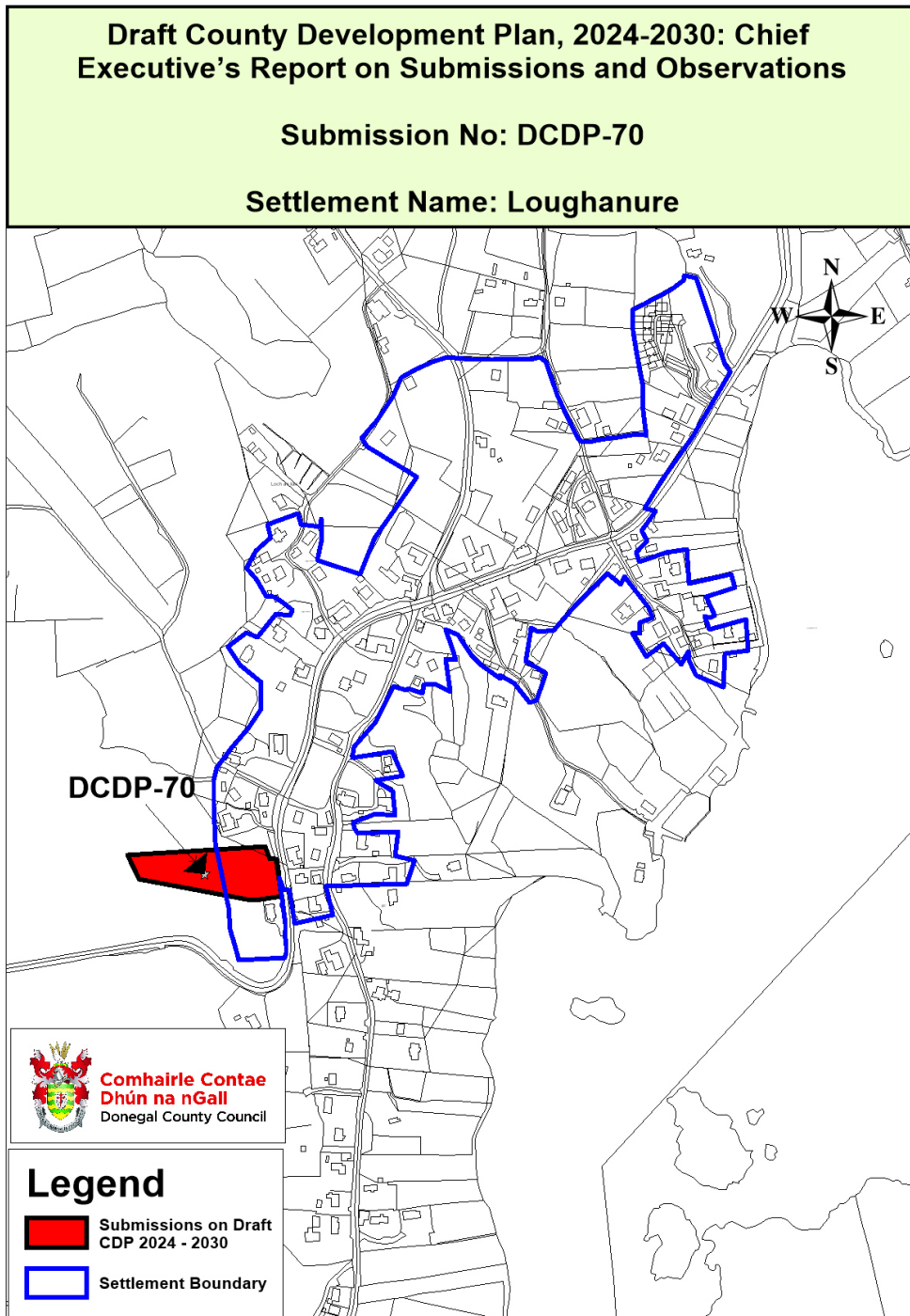
Submission No: DCDP-46 & 191

Settlement Name: Dunfanaghy



<p>Name/Submission Ref. No.: DCDP-70</p>
<p>Proposal/Rationale:</p> <p>Inclusion of lands within the settlement framework boundary of Loughanure (nb. the eastern portion of said lands are contained already within the settlement framework boundary).</p> <p>Lands formed part of multiple planning applications whereby permission was given for the construction of 3 no. dwellings under planning references; 04/2489, 08/30293. A further application 09/30425 for an extension of duration was granted extending the life of the permission until 21st August, 2012. However, subsequent County Development Plans amended the control points with the subject lands being left outside contrary to the policies and objectives of the Core Strategy in place in 2013 at the time of the planning decision for Plan Ref: 13/50380.</p> <p>Within the timeframe for delivery of previous live application, an access from the site onto the N56 was constructed which was within the 50km/h speed limit in 2009.</p> <p>The submission sets out detail of the housing allocation within the Core Strategy in the CDP 2006-2012, 2012-2018 & 2018-2024 with particular reference to Loughaure, its categorisation and amendments to control points/settlement framework boundary.</p> <p>Results of an analysis of available sites for residential or other use are included within the submission. Three sites were identified plus a site forming part of a current live application. This assessment seeks to support the need for additional lands within the Loughanure boundary and as justification for the inclusion of the subject lands. Inclusion of this area would offer scope to increase the residential yield in the village to address future residential needs.</p>
<p>Planning History:</p> <ul style="list-style-type: none"> • 04/2489 – ERECTION OF 3 NO HOUSES WITH COMMUNAL TREATMENT PLANT - granted • 08/30293 – CHANGES TO PLANNING PERMISSON REF. NO. 04/2489. THE CHANGES WILL CONSIST OF A CHANGE OF HOUSE DESIGN FOR THE 3 HOUSES, A CHANGE IN THE FINISHED FLOOR LEVEL FOR THE 3 HOUSES AND A CHANGE OF HOUSE LOCATION FOR 2 OF THE HOUSES - granted • 09/30425 – EOD – granted • 13/50380 - CONSTRUCTION OF 3 NO. HOUSES WITH A COMMUNAL WASTEWATER TREATMENT PLANT AND PERCOLATION AREA AND ALL ASSOCIATED SITE WORKS – refused on basis that said site was outside the town boundary limit and contrary to the CDP policies and objectives on rural housing.
<p>Chief Executive’s Response:</p> <p>The settlement framework as contained in the Draft Plan is compact in scale. As noted above, part of the site is already within the boundary. From this perspective, a modest form of development is already supported by the existing settlement framework boundary. The proposed extension would be incongruous to the compact form of the village and would also strident and obtrusive as viewed from the national road on the approach from the west.</p>
<p>Chief Executive’s Recommendation 21G.9:</p> <p>Not to amend the boundary.</p>

LOUGHANURE



INISHOWEN MD AREA SETTLEMENT FRAMEWORK SITE-SPECIFIC SUBMISSIONS

The settlements that are the subject of such submissions are listed below:

- Fahan
- Movice
- Muff
- Newtowncunningham
- Quigley's Point

FAHAN

<p>Name/Submission Ref. No.: Sean Hegarty/DCDP-8 :</p> <p>Lands located at Figary Fahan.</p>
<p>Proposal/Rationale:</p> <p>Inclusion of lands within the settlement framework boundary. Rationale included with submission:</p> <p>The current zoning of this land results in the land use of the site only being suitable for one-off dwellings for applicants who comply with Section 47, which is not desirable for our client in order to complete the existing development. The lands were purchased at a very high premium during the boom and our client has spent a considerable amount of money on the site development works for 11 no. dwellings. It was only due to the economic downturn that the construction of these dwellings were not feasible at the time. In the last number of years with the upturn in construction, our client has been able to sell some of the sites within this development, with one dwelling completed and several others due to commence on site shortly. Due to this factor our client wishes to develop the remaining sites in order to complete the previously granted development of 11 no. dwellings.</p> <p>We consider the current zoning to be unreasonable. Firstly, the lands are already serviced and ready for development to complete the overall development. Secondly, as stated above six of the eleven dwellings granted have either been started or will be commencing on site soon with permission for the development only due to expire on 15th September 2023.</p>
<p>Relevant Planning History on subject and adjacent lands:</p> <p>00/4796 – SITE DEVELOPMENT WORKS FOR 11 NO DWELLINGS</p> <p>12/50041 - ERECTION OF 11 NO. 2 STOREY DWELLING HOUSES WITH WASTEWATER TREATMENT SYSTEM WITH DISCHARGE TO PUBLIC SEWER AND ALL ASSOCIATED WORKS (FOLLOWING COMPLETION OF SITE WORKS UNDER PLANNING REF: 00/4796</p> <p>17/51511 – EOD, ERECTION OF 11 NO. 2 STOREY DWELLING HOUSES WITH WASTEWATER TREATMENT SYSTEM WITH DISCHARGE TO PUBLIC SEWER AND ALL ASSOCIATED WORKS (FOLLOWING COMPLETION OF SITE WORKS UNDER PLANNING REF: 00/4796)</p> <p>22/50738 - CHANGE OF HOUSE TYPE PREVIOUSLY GRANTED UNDER PLAN. REF. NO.'S 12/50041</p> <p>22/50932 – ERECTION OF DWELLING (granted on basis of unfinished housing development policy)</p> <p>23/51632 – New application - ERECTION OF A DWELLING WITH PROPRIETARY WASTEWATER TREATMENT SYSTEM, CONNECTION TO EXISTING SERVICES AND ALL ASSOCIATED SITE WORKS (granted on basis of rural housing policy.</p> <p>23/51791 and 23/51385 - applications for single dwellings (undecided as of 18th December, 2023)</p>
<p>Chief Executive's Response:</p> <p>The subject lands are located immediately adjacent to, and outside of, the northern edge of the SF boundary. The lands are greenfield in nature and located at a significant elevation overlooking the adjoining regional road and Lough Swilly. The site does not immediately adjoin the public road and access to the regional road is along an estate road constructed on foot of previous permissions.</p> <p>The low-density development previously permitted, and the elevated nature of the lands (thus likely to discourage active travel journeys) would provide for development contrary to the national climate change and compact growth policy agenda. However, the planning history must also be considered in this case. Firstly, the permission for 11 dwellings only expired in September 2023. Extensive site</p>

development works were undertaken on foot of previous permissions (although it is noted that they are incomplete in the absence of a final wearing course and public lighting). The Authority recently has granted two dwellings on foot of individual applications for one-off dwellings on plots in line with the original overall permission. One of these was granted based on facilitating the completion of an unfinished housing development in line with current policy (policy UB-P-17 in the CDP 2018-2024):

UB-P-17: It is a policy of the Council to consider proposals for urban residential development that seek to resolve existing unfinished residential development, including through appropriate reconfiguration of developments, and such proposals shall be considered outside the population targets set by the core strategy.

The other was granted under rural housing policy.

Two further applications for individual dwellings are awaiting decisions (as of 18th December, 2023)

Having regard to: the expiry of the parent permission only very recently (September, 2023); the extensive site works already undertaken; the completion of one of the permitted houses; the recent decisions of the Authority to grant two further houses; and the greater opportunity to secure full site development works through a multiple development, it is considered on balance that the requested boundary extension should be accommodated.

Chief Executive's Recommendation 21I.1:

To extend the settlement boundary to incorporate the overall site layout previously permitted under PP Ref. No. 12/50041.

(This is considered to be a material alteration.)

Name/Submission Ref. No.: John Mc Daid/DCDP-71

Proposal/Rationale:

Submission requests that the land set out in the accompanying map(s) are included within the settlement framework boundary for Fahan. The submission can be summarised as follows:

- Site is Fahan marina and adjoining land, located within the village and immediately adjacent to the settlement framework boundary, with services (no precise detail provided), and road access from main regional road.
- Lands are in a prime location for further development with strong potential for tourism to the area.
- Positive preplanning engagement has been undertaken.
- Lands currently not zoned for tourism development which is a loss to the area. National tourism policy is to increase overseas visitors and revenue and ultimately increase the NWS share of this revenue given the regions underperformance. The WAW in Inishowen along Lough Swilly is the perfect location to provide luxury guest accommodation along this route.

The image below was included with the submission:



Relevant Planning History:

01/4426 - ERECTION OF SERVICES BUILDING CONSISTING OF: RECEPTION, OFFICES, CHANDLERY SHOP, CAFE, KITCHENS, PROVISIONS SHOP, TOILET, SHOWERS AND STORES WITH CAR PARKING, HARDSTANDING FOR BOAT STORAGE AND ANCILLARY WORKS IN CONNECTION WITH THE MARINA

11/70047 – Extension of Duration of PP 01/4426

Chief Executive's Response:

This site itself comprises land reclaimed during the construction of the marina during the mid-1990s. The adjoining Lough Swilly is an SAC as are the lands the subject of this submission.

The tourism potential of this proposal is recognised. It is considered reasonable to include the lands within the boundary for tourism-related development only, but subject to the exclusion of holiday homes. A proposed policy for the site is included in the recommendation below.

Chief Executive's Recommendation 21I.2:

- a. Amend the settlement framework boundary to include the marina site as identified in the submission.
- b. Insert the following policy:

Policy SF-P-xx: To facilitate the sustainable provision of a hotel and marina leisure tourism development at Fahan Marina and its environs. In general, standalone holiday homes will not be supported.

(This is considered to be a material alteration.)

Name/Submission Ref. No.:**BMA Planning on behalf of their clients Development and Construction Ltd. DCDP-178****Proposal/Rationale:**

The submission makes two requests:

1. The settlement framework boundary for Fahan is extended to include the subject lands outlined and hatched in blue below. States that the subject lands are accessible by a private road and have a public water supply and foul drainage is connected to the mains on the Buncrana road. Includes a feasibility study on how the site can accommodate c. 6 detached houses in a pattern and density that is similar to the Gollan Hill development.



2. In addition, or as an alternative, also propose to insert a new policy to allow for the consideration of other lands outside of settlement framework boundaries throughout the county. The submitted policy wording is inserted below:

Throughout the County, there are multiple housing developments located outside of designated settlement boundaries identified in the Development Plan zoning maps. Reasonable intensification/ infilling or extensions these developments may be considered on their merits subject to normal proper planning and design criteria and subject to the availability of water and foul drainage infrastructure, access to a suitable road network and availability of adequate social and community infrastructure.

Planning History:

No recent relevant planning history on the subject lands or immediately adjoining.

Chief Executive's Response:

The subject lands comprise 1.8ha and immediately adjoin the existing housing development at Gollan Hill located outside the north-west edge of the SF boundary.

The site is very elevated and physically removed from the village. Furthermore, the existing access road does not have a footpath for a significant length meaning that the proposed site would not be conducive to travel by sustainable modes. The inclusion of the site within the settlement framework for residential purposes would be inconsistent therefore with the national climate change and compact growth policy agenda. For these reasons the boundary extension proposal is not supported.

Regarding the proposed policy, the same considerations should apply. The inclusion of such an unfettered broad policy support for development of lands many of which are peripheral from settlement cores would again be contrary to the national policy approach as referenced above.

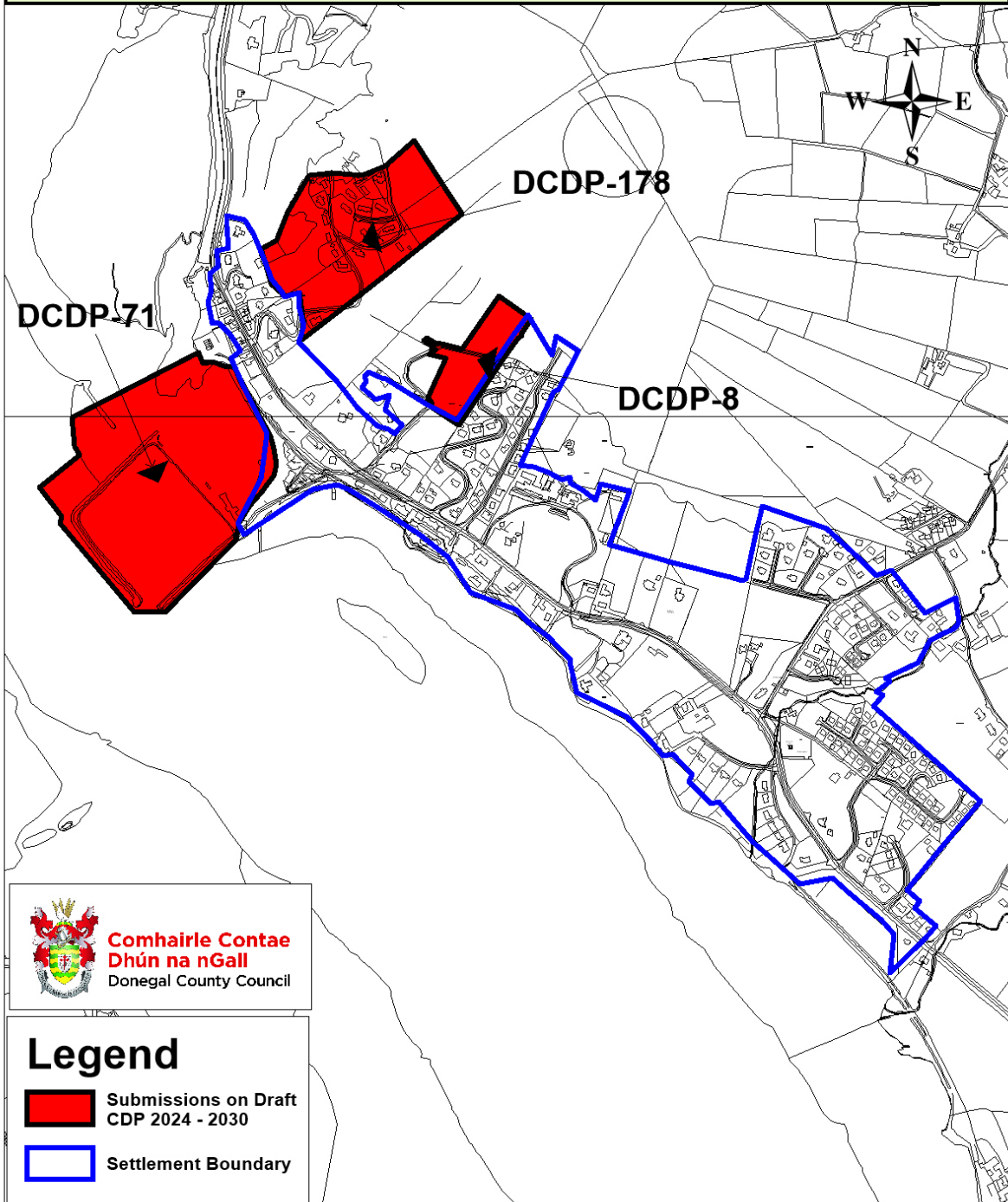
Chief Executive's Recommendation 21I.3:

- 1) Not to amend boundary; and
- 2) Not to incorporate the suggested policy.

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-8, 71 & 178

Settlement Name: Fahan

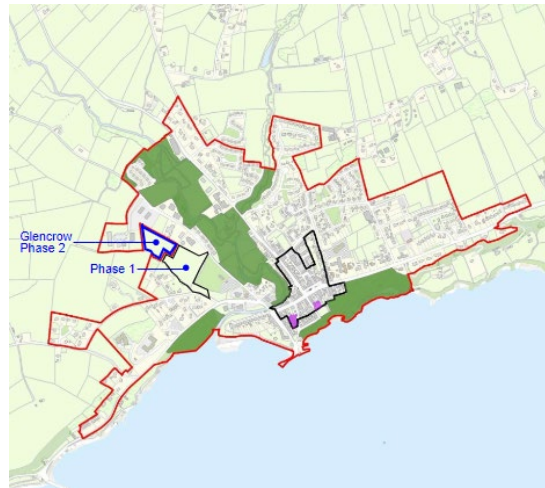


MOVILLE

Name/Submission Ref. No: DCDP-93 Foylegrange Development.

Proposal/Rationale:

Submission seeks the extension of the settlement framework boundary and inclusion of subject lands within the SF. The lands are located immediately adjacent to the western edge of the SF for Moville and illustrated as phase 2 below.



Planning History:

No relevant planning history on subject lands.

Planning history on adjoining lands and within landholding:

13/50165 – Extension of Duration of 07/70340 for 44 no units (phase 1 lands above) – Expired 10/2/18.

20/50818 – permission granted for 35 no residential units to immediate south-east and marked as phase 1 on map above.

Chief Executive's Response:

Having regard to the compact nature of the site and adjoining lands, to the extant permission for multiple residential development within the overall landholding and to the opportunity to deliver compact housing in a village setting, and having regard also to the limited scope for multiple residential development elsewhere in the village , it is reasonable to consider extending the boundary in this location to include the subject lands.

Chief Executive's Recommendation 21I.4:

Amend the settlement framework boundary to include site as identified in the submission.

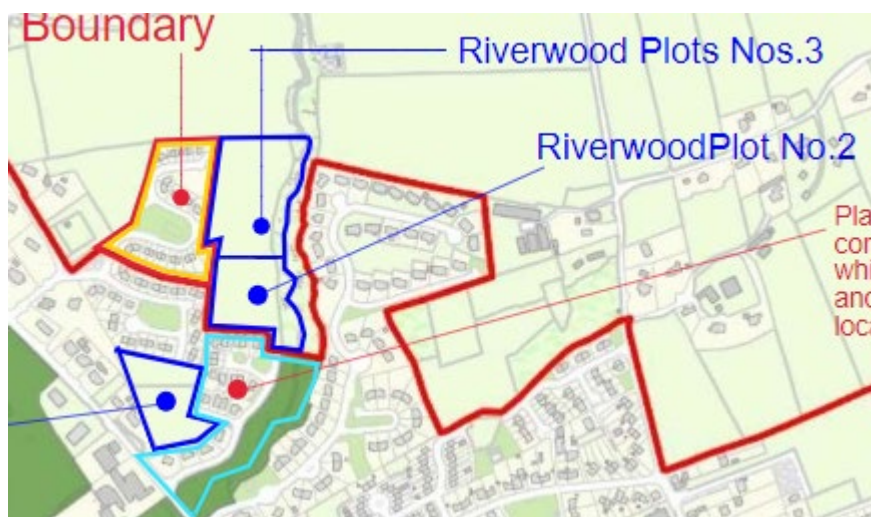
(This is considered to be a material alteration.)

Name/Submission Ref. No.: Conor Kelly DCDP-94

Note this submission identifies Plots 1, 2 and 3 on accompanying mapping. However, no request is made for any change in relation to the lands identified as Plot 1 (presumably as they are already within the settlement boundary).

Proposal/Rationale:

This submission sets out the landowners request for a parcel of lands marked as 'Plot 2' and 'Plot 3' on the map accompanying the submission (as per below) to be included within the SF boundary for Moville. The basis of this request is having regard to the positive planning history (permission in 2006 for the construction of 35 no dwellings on the overall landholding) and that the existing services are in place to cater for the full development originally permitted. The site is flanked on both east and west boundaries by existing residential estates. Notes that the estate to the west is not included within the settlement boundary and that if that estate was included, the subject site could be looked at favourably.

**Relevant Planning History on overall lands to the south:**

06/70031 – Permission granted for 35 no dwellings.
11/70083 Extension of Duration of 06/70031 expired 28/3/16 (13 not unconstructed):

Chief Executive's Response:

The subject lands are well positioned in relation to the overall settlement, with a continuous footpath in place from the site which measures a distance of 750m into the town centre core.

Having regard to the location of the site and its walkability to the town core creating active travel opportunities and reducing private car dependency, to the planning history (22 of the 35 units permitted under 06/70031 are constructed; the remaining lands to which this permission applied are identified as 'Plot 2') the inclusion of the subject lands within the settlement framework boundary is considered appropriate.

Nb. It is also considered that the boundary should be further amended to incorporate the existing estate to the west of the subject lands.

Chief Executive's Recommendation 21I.5:

Amend the settlement framework boundary to include both the subject site as identified in the submission and the existing estate to the west.

(This is considered to be a material alteration.)

Name/Submission Ref. No.: DCDP-131 Canavan Hospitality**Proposal/Rationale:****1. A Small hydro facility at the existing dam on the River Bredagh in Gulladuff Townland, Moville within the settlement as zoned "Amenity"**

Our boutique holiday hostel has secured a Donegal Co. Council LEO grant in principle for an energy study including hydro power micro-generation.

Small hydro power or micro generation is supported in the Draft Development Plan. This would deliver sustainable energy to our existing boutique holiday hostel enterprise nearby ensuring its financial viability and meeting net zero targets.

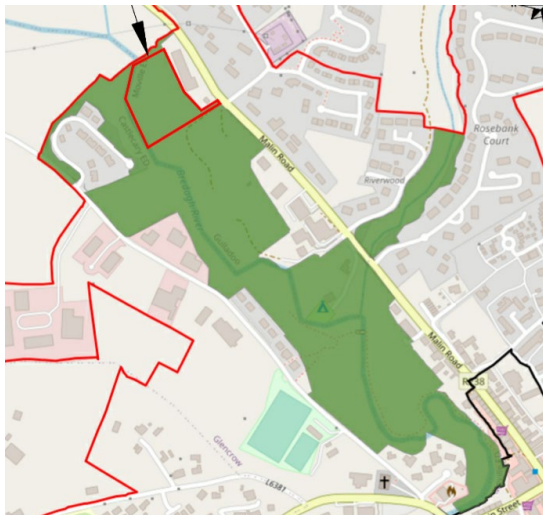
A small hydro-project would have little landscape and visual impact and would not undermine the essential context of the amenity designation.

2. That the Amenity designation supports environmentally compatible development such as tourism and specifically glamping/camping and a motor/camper van facility on this site. As a hospitality business operator, we need these diversify our hospitality range.

The wording of the Amenity designation seeks leisure and recreation facilities that we believe is compatible with our stated tourism hospitality desires for glamping and camping.

We welcome this Amenity designation in principle but it is hindering our natural expansion and sustainability of our family hospitality business, which we strongly believe would compliment, enhance and protect the amenity principles whilst providing public access such as riverside walk that we would facilitate.

Moreover, there is no glamping facility or motor home/camper van facility in Moville or environs.

**Relevant Planning History:**

(None at, or in immediate vicinity of, site.)

Chief Executive's Response:Small Hydro Facility

The reference to the broad support in the Plan for renewable energy inclusive of hydro projects is acknowledged and it is considered that the provision of such a facility may be possible in a manner that has minimal impact on the amenity area. However, the Strategic Flood Risk Assessment

prepared for the Draft Plan identifies a large part of the subject site as being within a Flood Risk A area (the image below shows the flood risk area in blue and the subject site in yellow).



Having regard to the nature of the proposed development, it is considered premature to positively reference the proposal in the Plan in the absence of any evidence regarding the potential impact of a hydro power generating facility on the watercourse and any existing flood risk.

Glamping/Camping/Motorhome Facility

Having regard to: the local environmental value of the Bredagh River and its environs; the ecological connections provided by the River; and the amenity assets of the designated area to the town in general, it is considered that the proposal should not be supported at this location.

Chief Executive's Recommendation 21I.6:

Not to amend the Plan.

Name/Submission Ref. No.: Grace Canavan DCDP-134 - Lands Within the Vicinity of the Movice**Proposal/Rationale:**

This submission seeks an amendment to the extent of land covered by the amenity zoning to the north of the town and alongside the Bredagh river. This is to allow for the consideration of a single dwelling for the applicant on her family lands.

**Planning History:**

03/4312 Outline Permission for 7 apartments (grant).

08/70412 Permission for Dwelling (refused)

Chief Executive's Response:

Notwithstanding the outline permission granted in 2003, the refusal decision in 2008 is of greatest relevance. This application was refused for three reasons. The first questioned the principle of such a development in terms of concern around the difficulty in integrating development with adjacent structures and concluded that it constituted a 'substandard form of piecemeal development'. The third reason noted concerns around the ability of the applicant to achieve the necessary visibility splays at the site access junction with the public road.

Having regard to the site history, this proposal is not supported.

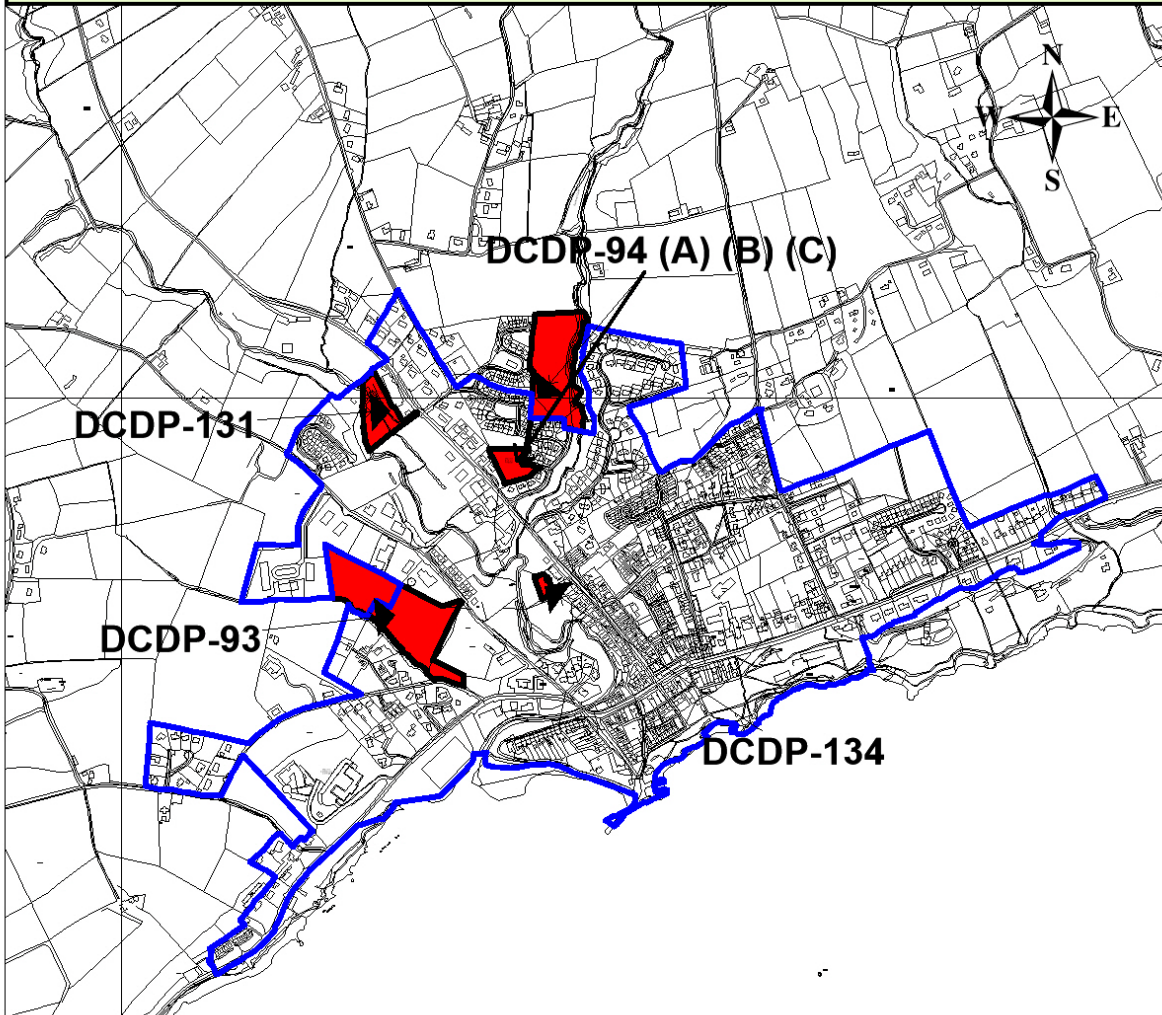
Chief Executive's Recommendation 21I.7:

Not to amend the Plan.

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-93, 94 (A) (B) (C), 131 & 134

Settlement Name: Moville



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

Legend

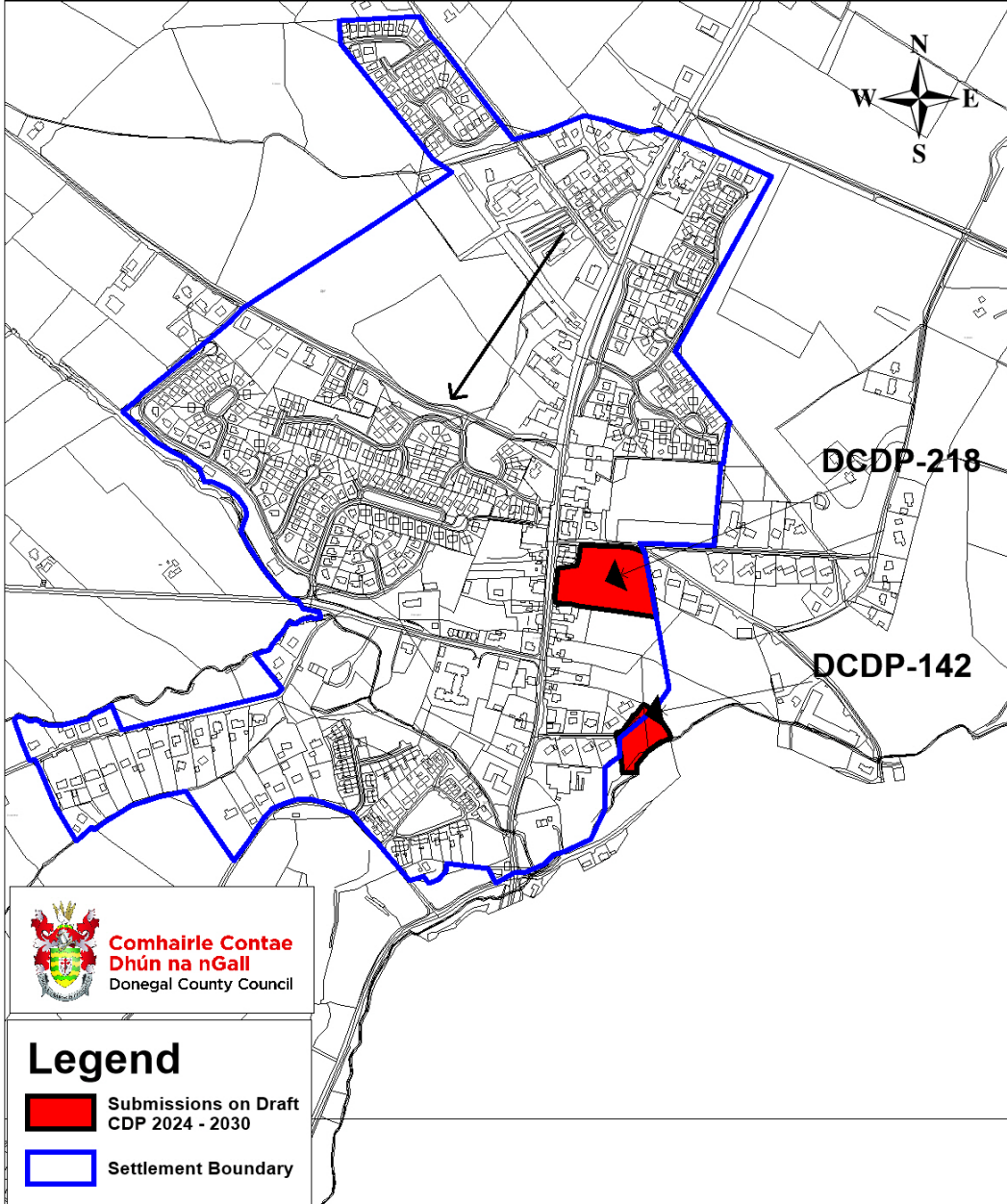
-  Submissions on Draft CDP 2024 - 2030
-  Settlement Boundary

MUFF

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-142 & 218

Settlement Name: Muff



Name/Submission W.P. Kearns Ltd. Ref. No.: DCDP-142**Proposal/Rationale:**

Requests this area be included within the SF Boundary for Muff and within the town centre boundary of same. States that the area was previously included but was excluded in the CDP 2018-2024. Notes that the permission was granted for housing under 07/71035, development did not commence due to the economic downturn and financial planning conditions. Notes that the owners did not expect the area to be excluded from the Settlement boundary in the previous plan.

Indicates that the mixed use development permitted under 22/50916 (which is to be accessed from the subject area) is not feasible without the inclusion of the subject area. Notes that under 22/50916 a NIS was carried out which found no negative impacts on the environment, an invasive species and management plan was approved and a Transport and Traffic Assessment was carried out and approved. Further states that all services and infrastructure will be provided as approved under 22/50916.

Relevant Planning History:

- **07/71034:** Permission, 6 apartments and Mixed Use Building comprising of Retail Units and 5 apartments – Granted
- **07/71035:** Permission, 10 Townhouses – Granted
- **07/71036:** Permission 10 Apartments and 8 Townhouses – Granted
- **21/50916:** Permission **Block 1:** Part Demolition/Refurbishment of Old Garda Barracks with Café and 4 apartments, **Block 2:** 6 Apartments, **Block 3;** 12 Apartments, **Block 4 and 5:** 8 Townhouses, Granted **Note: Block 6: 6 townhouses and Block 7: 5 townhouses and the associated road and footpath off the main access road were not permitted as they lay outside the SF Boundary**
 - Note: All the above applications included the subject site and the strip of land to the north west.

Chief Executive's Response:

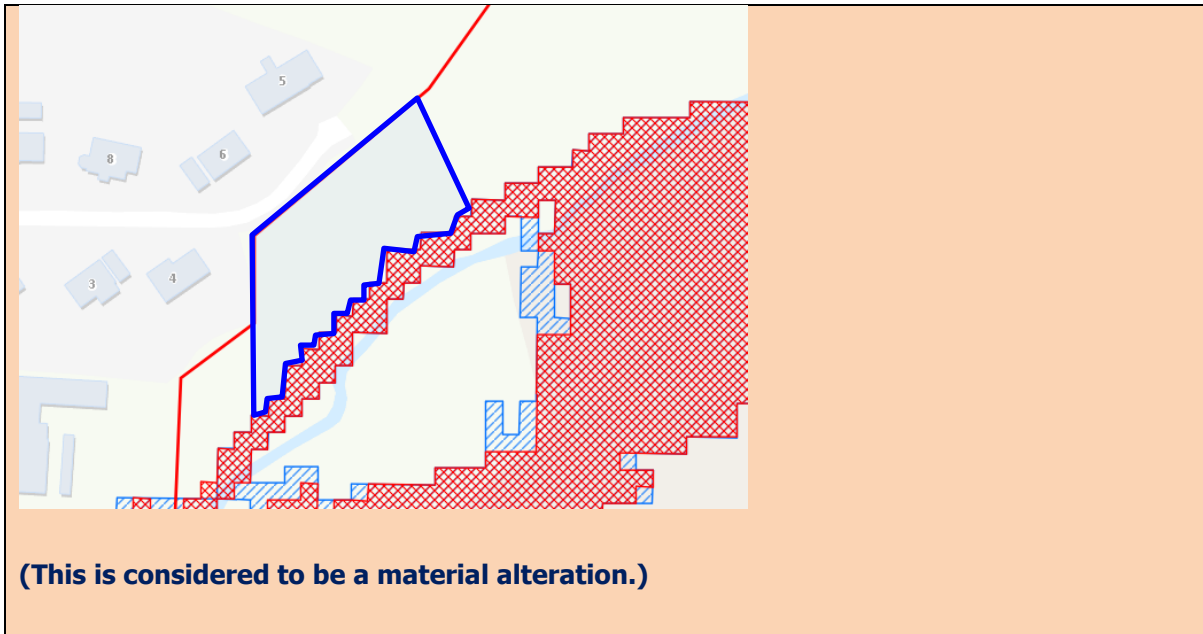
In the first instance it is not accepted that the 22/50916 cannot be physically developed without the inclusion of the subject area. In this regard whilst part of said multiple residential development was not permitted on the subject area (as it lay outside the SF Boundary) the access roads necessary to complete the rest of the development were permitted.

Otherwise, the subject area, adjoins the built-up urban footprint, is located in relatively compact sequential location (approximately 171m/2 min walk form Muff Village Centre) can be serviced by adjoining watermains and sewers, roads and footpaths (effluent treatment for Muff is provided by NI Water) is not located within any ecological designations, has a generally favourable topography and physical arrangement, and does not interact with any recorded architectural/archaeological assets. However, a small portion of the lower end of the site is located within the HEFS Flood Zone A.

On the basis of the above assessment, it is considered that, with the exception of the small portion of the site subject occurring within the HEFS Flood Zone A, there is planning merit in including the remainder of the subject site within the Muff Settlement Framework Boundary.

Chief Executive's Recommendation 21I.8::

Extend the Settlement Framework for Muff by the addition of the area outlined in blue in the map below.


Name/Submission Ref. No.: DCDP-218 Lawrence McColgan
Proposal/Rationale:

Requests that area be rezoned from amenity to residential within the Muff Settlement Framework. States that the site is prime residential land, fronts Main Street, and would achieve many of the key planning objectives set out in Chapter 21. Notes Muff is identified a service town in the Core Strategy and performs an important local retail and employment function at the interface of Donegal and Derry.

Acknowledges that 10 years ago the field was used as a sports field but since then has been used exclusively as an agricultural field. Notes that sporting facilities has since moved to a more appropriate and permanent facilitate at Ardmore.

Argues that the site should be zoned as a residential site, as it fronts onto the commercial heart of Main Street, all services are available and it will help to create compact urban forms, protect rural character of adjoining areas, ensure new residential development is located close to local services and occurs sequentially, and create a vibrant consolidated and accessible town centre.

Also notes that the there is a typographical error in within Chapter 3 in that it fails to identify Muff and Bridgend as a service town

Planning History:

No Recent Planning History on the site.

Chief Executive's Response:

The subject site is located in central, compact on sequential location adjoining Muff Main street, is serviced 225mm sewer and 150mm uPVC watermain (effluent treatment for Muff is provided by NI Water), the R236 regional road and footpath, is not located within any ecological designations, has a generally flat topography and physical arrangement, does not interact with any recorded architectural/archaeological assets and is not located within the HEFS Flood Zone A and B. As such it is eminently suitable for residential development.

Otherwise, whilst the site was previously used as a football pitch, a football pitch for Quigleys Point Swifts FC has been provided within walking distance of the village centre at Ardmore. Accordingly,

it is considered that the original amenity use for which this zoning was intended has been fulfilled at another suitable location.

Consequently it is considered that the amenity zoning on the subject site can be removed within the Muff settlement framework map. In this regard it is not considered necessary/appropriate to zone the land Residential as removing the amenity zoning would allow the site to be considered for residential, retail, commercial and other uses and residential specific sites are not otherwise identified within the settlement framework maps.

Chief Executive's Recommendation 21I.9:

Remove the amenity zoning on this site (outlined in red in the map below) in the Muff Settlement Framework Map as detailed below.



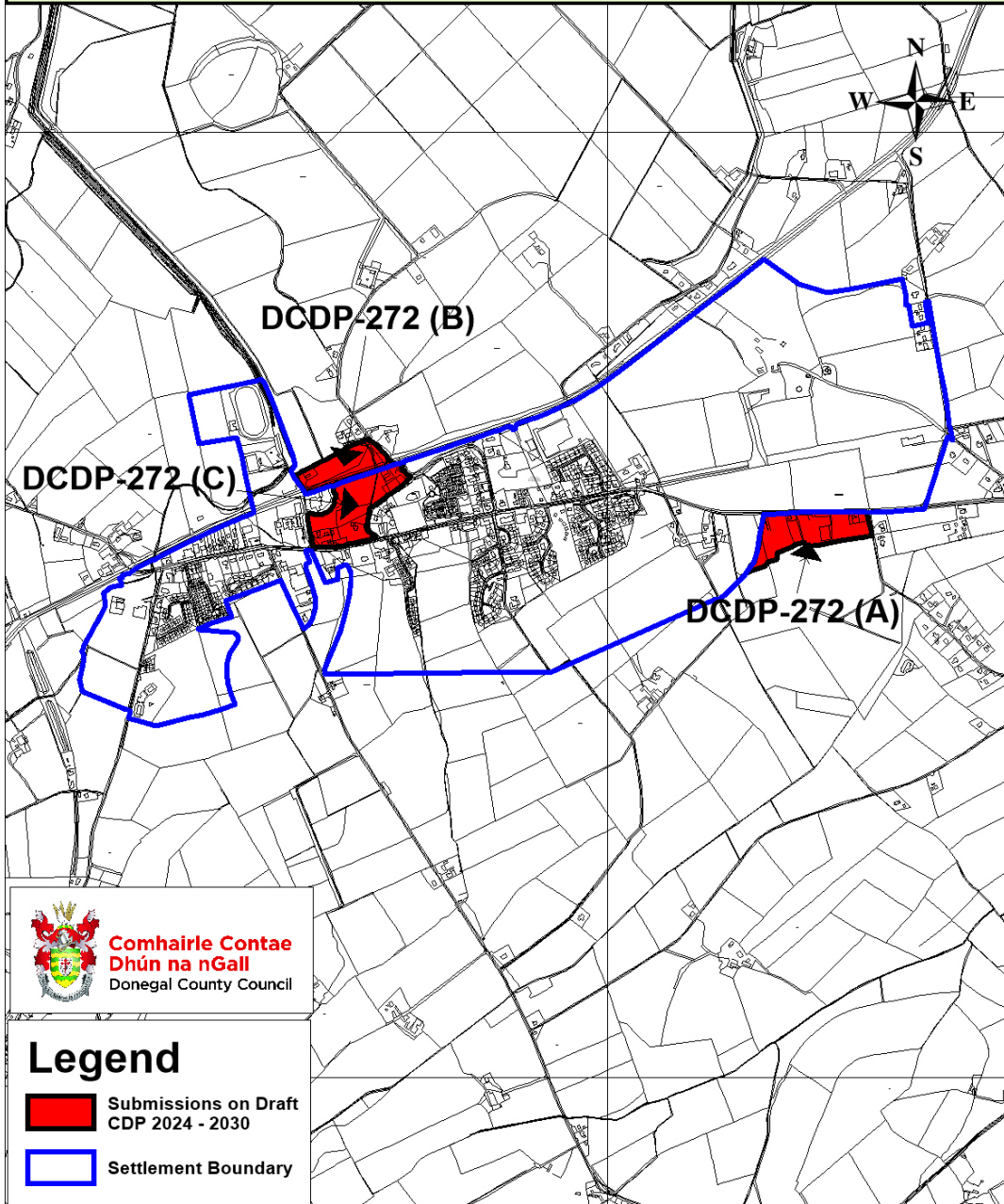
(This is considered to be a material alteration.)

NEWTOWNCUNNINGHAM

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-272 (A) & (B) & (C)

Settlement Name: Newtowncunningham



Name/Submission Ref. No.: DCDP-272 (A) Teresa McGee
<p>Proposal/Rationale:</p> <p>Seeking extension of settlement boundary for recycling business to enable future expansion, if required.</p>
<p>Planning History:</p> <ul style="list-style-type: none"> • 06/71318 Permission Pat Brown Dwelling Refused By ABP (Rural Housing Policy and Suburban) • 06/71329 Permission Margaret Brown Dwelling Refused By ABP (Rural Housing Policy and Suburban) • 07/71673 Permission Patrick Logan Waste Recovery And Transfer Depot Together With Office Block Granted • 21/50089 Permission Office Building With Associated Facilities (2) External Recycling Storage Bays, At Existing Waste Recovery And Transfer Depot
<p>Chief Executive's Response:</p> <p>The site currently consists of a permitted waste recovery and transfer depot and adjoining fields and deciduous woodland in a rural area to the east of Newtowncunningham. The submission seeks the extension of the Settlement Framework boundary to enable its future expansion.</p> <p>However, the site is already occupied by a waste recovery and transfer depot and ED-P-7 of the Draft CDP specifically makes provision for the expansion of an existing economic development in the countryside including such a facility. Furthermore, the extension of the SF boundary would also facilitate other forms of development including multiple residential, the site is located in a peripheral and unserved location, and there is already a significant amount of unused lands at compact, served locations within the existing proposed SF boundary. In addition as stated portions of the site are covered in deciduous woodland. Consequently, it is not agreed that the site should be included within the settlement framework boundary of Newtowncunningham.</p>
<p>Chief Executive's Recommendation_21I.10:;</p> <p>It is <u>not</u> recommended that the site be included in the settlement framework boundary of Newtowncunningham.</p>

Name/Submission Ref. No.: DCDP-272 (B) Teresa McGee
<p>Proposal/Rationale:</p> <p>States that the area has plans for a greenway car-park, including the possibility of an underpass with connections to the centre village from the GAA grounds.</p>
<p>Planning History:</p> <p>09/70223 Permission Erection of a Directional Sign Granted</p>
<p>Chief Executive’s Response:</p> <p>The provision of a greenway car-park at this site or improved pedestrian connections over the N13 would not necessitate the inclusion of the site within the SF boundary of Newtowncunningham.</p> <p>Otherwise, the inclusion of the land within the SF boundary would facilitate other forms of development including multiple residential development. The site is serviced by a 250mm upvc watermain and lies adjacent to the Newtowncunningham WWTP, is physically adjacent to the village, Kernan’s retail outlet and Scoil Colmcille National School, has a flat topography, is not located within any ecological designation and does not contain any architectural or archaeological features,</p> <p>However crucially the site it is physically severed from the village by the N13 National Primary route, no significant urban development has occurred to the North of said road and there is currently limited safe pedestrian access over the N13 in the form of a traffic island. Furthermore a substantial portion of the site lies within 50m of the N13 and there is no established building line closer to the N13 at this location development within said setback would be precluded by Policy T-P-13 of the Draft CDP. In addition the site lies entirely within the HEFS Flood Zone A and Flood Zone B.</p> <p>Consequently it is not agreed that the site should be included within the settlement framework boundary of Newtowncunningham.</p>
<p>Chief Executive’s Recommendation 21I.11::</p> <p>It is <u>not</u> recommended that the site be included in the settlement framework boundary of Newtowncunningham.</p>

Name/Submission Ref. No.: DCDP-272 (C) Teresa McGee
<p>Proposal/Rationale:</p> <p>Include within the town centre boundary 'for the development of the town and in keeping with the proposed masterplan.'</p>
<p>Planning History:</p> <ul style="list-style-type: none"> • 06/70495 Permission Dwelling - Refused (Housing policy, overdevelopment, and traffic safety) • 06/71848 Permission Dwelling - Granted • 14/51075 Permission 2 Storey Extension of Dwelling – Granted • 06/70976 Permission Demolition of a Dwelling And Construction Of Town Houses – Granted • 08/70748 Permission 4no. Semi-Detached Dwelling Houses In Lieu Of Planning Ref. No. 06/70976 – Granted
<p>Chief Executive's Response:</p> <p>The subject site consists of some low density residential dwelling (including NIAH undeveloped greenfield lands and a church car park. An expansive area is currently designated town centre in the western portion of the village. This displays a dispersed low density character with a small number of scatted retail and commercial premises, low density residential dwellings and a primary health care centre, and an weak/ill defined streetscape with significant scope for further infill development. Further expansion of this town centre area would therefore hinder the creation of vibrant, higher density urban environment with a critical mass of retail, commercial and community services. Accordingly, it is not agreed that the subject area should be included in the town centre boundary.</p>
<p>Chief Executive's Recommendation 21I.12:</p> <p>It is <u>not</u> recommended that the site be included in the town centre boundary of Newtowncunningham</p>

QUIGLEY'S POINT

Name/Submission Ref. No.: Teresa Mc Gee - DCDP-272

Proposal/Rationale:

Requests the inclusion of this area within the Quigleys Point settlement framework. States that the site has a building already constructed 'for the purpose' of a hostel but is unable to achieve planning as it is outside the settlement framework.



Planning History:

21/51987 – Retention Permission for 3 No. Townhouses. Refused for the following reasons:

1. Multiple housing not permitted outside settlement framework boundary.
2. Traffic safety.
3. Public health (effluent treatment proposals).

Chief Executive's Response:

The lands in question are the subject of a significant unauthorised development, notwithstanding that the Authority is statute-barred from taking enforcement proceedings. Providing tacit support for such development by including it within the settlement framework is questionable at the very least. In any event, even if the request is agreed and the settlement framework boundary is extended, this will not enable the owners to regularise the development. Whilst to do so would allow for the consideration of a multiple development on the site, it is highly unlikely that the development as constructed could be supported for the following reasons:

1. The close proximity of the unauthorised building containing the three townhouses in such close proximity to the 'parent' dwelling is substandard and haphazard development;
2. The communal treatment plant is contrary to policy; and
3. The substandard vision lines are also contrary to policy and constitute a road safety hazard.

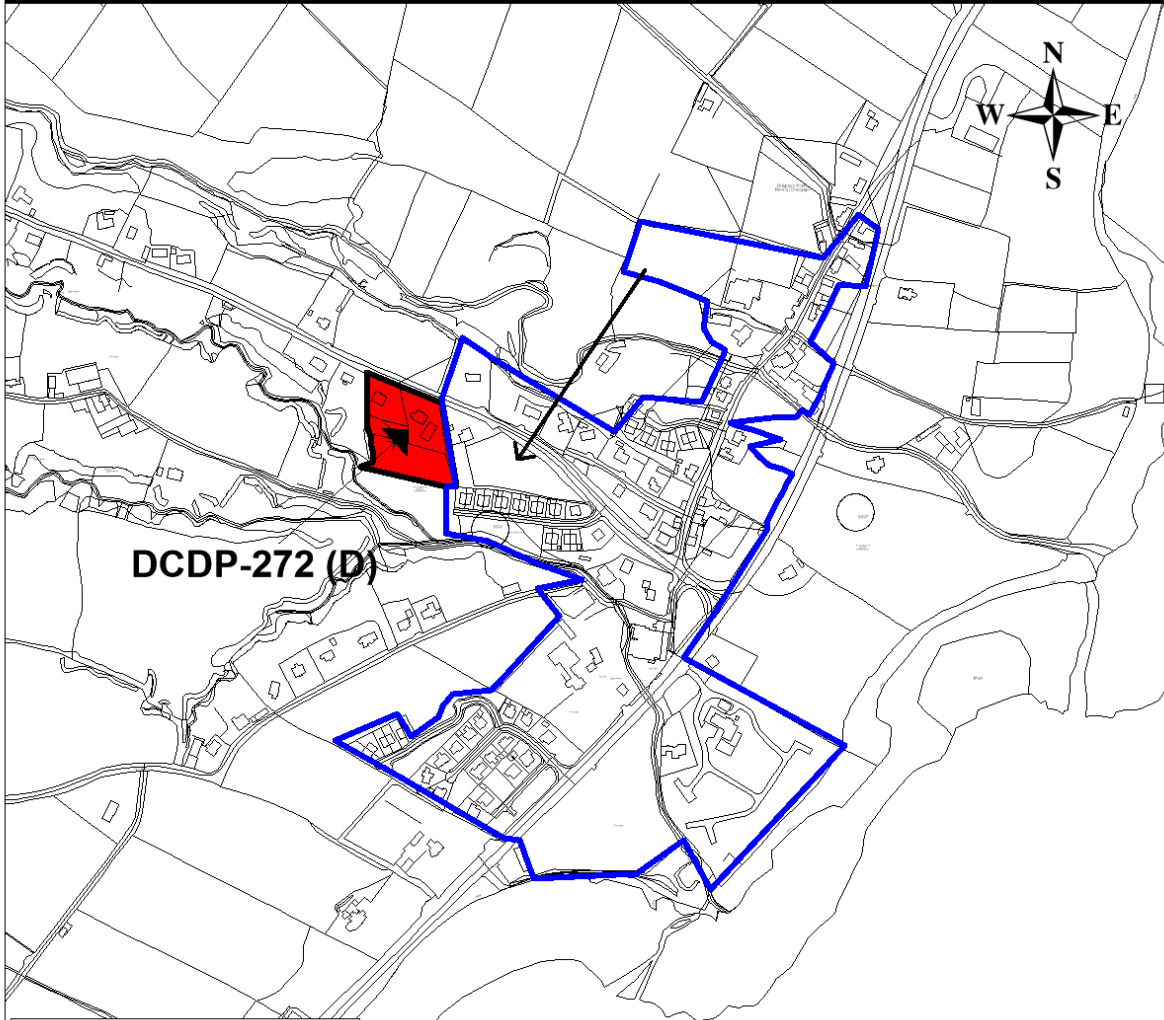
Chief Executive's Recommendation 21I.13:

Not to amend the Plan.

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-272 (D)

Settlement Name: Quigleys Point



DCDP-272 (D)



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

Legend

 Submissions on Draft CDP 2024 - 2030

 Settlement Boundary

LETTERKENNY MD AREA SETTLEMENT FRAMEWORK SITE-SPECIFIC SUBMISSIONS

The settlements that are the subject of such submissions are listed below:

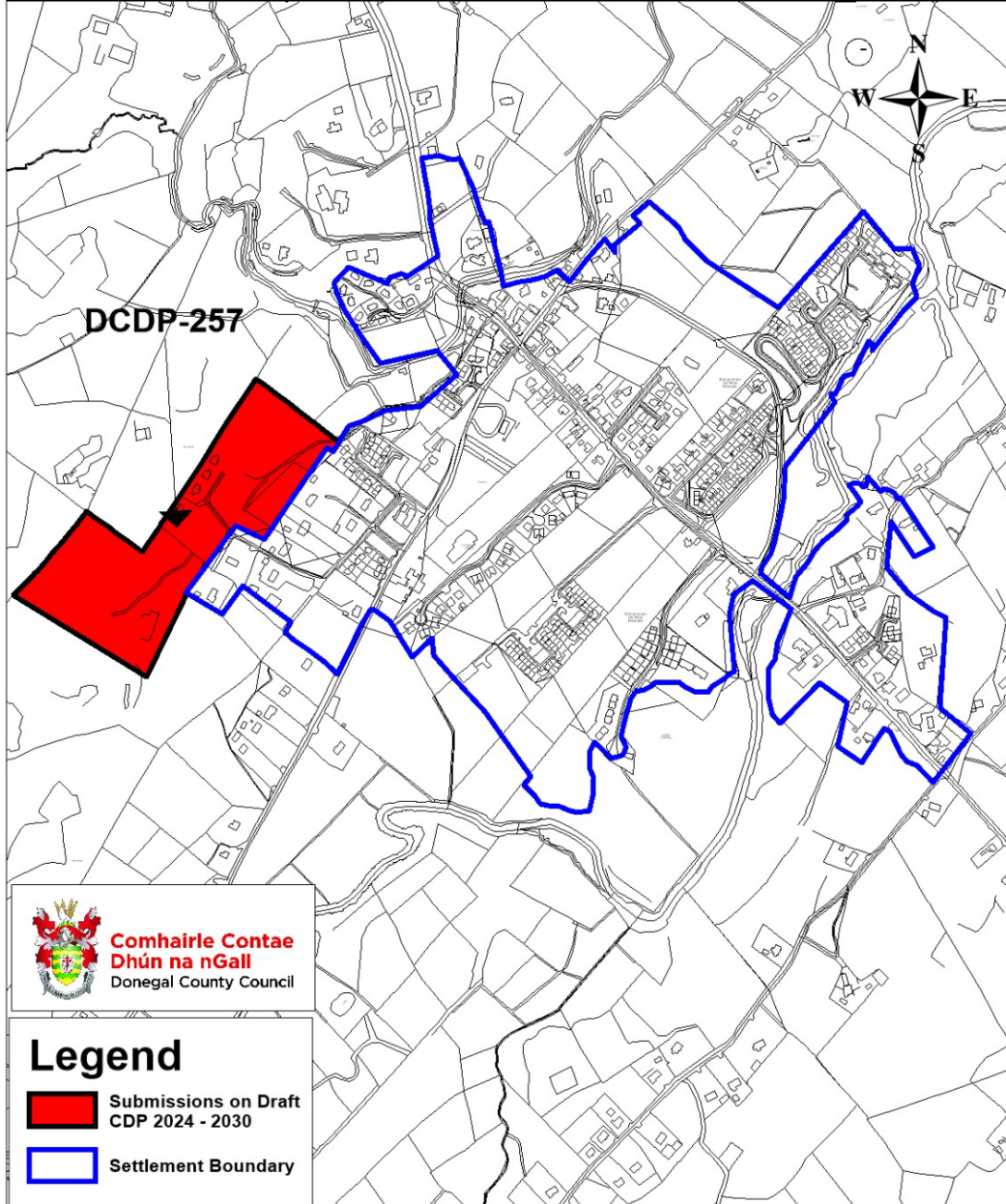
- Kilmacrennan
- Manorcunningham
- Milford
- Rathmullan

KILMACRENNAN

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-257

Settlement Name: Kilmacrennan



Name/Submission Brid Friels Ref. No.: DCDP-257**Proposal/Rationale:**

Seeks addition of lands into the Kilmacrenan Settlement Framework boundary. States that Kilmacrenan is a Tier 2B town, is located on the N56, has expanded in southwestern direction, the chapel and national are located on L-1532-2 which is less busy than the N56. States the N56 upgrade has rejuvenated Kilmacrenan and allowed shorter journey times and school runs to Letterkenny. The subject lands are serviced by footpaths, lighting and sewers. Planning permissions have been granted in the area which are at construction stage which are feeding into the public sewerage system. Opines that the proposal meets compact sequential growth, and that much of the lands closer to the village have been or cannot be developed, the area is 360m SW of the town centre whilst other lands in the village are 900m from the town centre, and the natural sprawl/expansion of the town is to the south west.

Planning History:

12/40022 Noel Tease Dwelling – Granted
 18/51460 Noel Tease Dwelling – Granted (Same site As 18/51460)
 21/51901 Hugh Fields Dwelling – Granted
 22/51627 Joe Gallagher Dwelling – Granted
 21/50035 Brid Fields Dwelling – Granted
 22/50515 Brid Fields Relocation of Dwelling Granted
 22/50889 Bird Fields Dwelling – Granted

Chief Executive's Response:

This subject area is located to the south west of the SF Boundary of Kilmacrenan, within the Leannan Valley Woods proposed Natural Heritage Area and consists of woodlands, cleared sites, and small fields. The area has been subject to significant development pressure in recent years with several single dwellings being permitted outside the SF boundary (see history above).



The subject area is an 8min walk (700m metres) from the village core of Kilmacrennan and 400m of Scoil Cholmcille NS, is served initially by a 2 lane road with footpath and then a narrow single lane road without footpath (serving 4 existing and 6 permitted dwellings), is serviced by a 100mm uPVC sewer, does not contain any recorded architectural or archaeological features and is not located within the HEFS Flood Zone A or B.

However, on the basis of/that: there remains a significant amount of serviced/developable land available for residential development adjacent to the village centre within the SF boundary, Policy BIO-P-2 of the Draft CDP provides for the conservation/protection of proposed Natural Heritage Areas, the extension would exacerbate the recent haphazard urban sprawl in this area and erode the rural/natural character of Kilmacrennan hinterland, and the single lane nature of the access road without footpath, it is not agreed that subject area should be included within the SF boundary.

Chief Executive's Recommendation 21L.1:

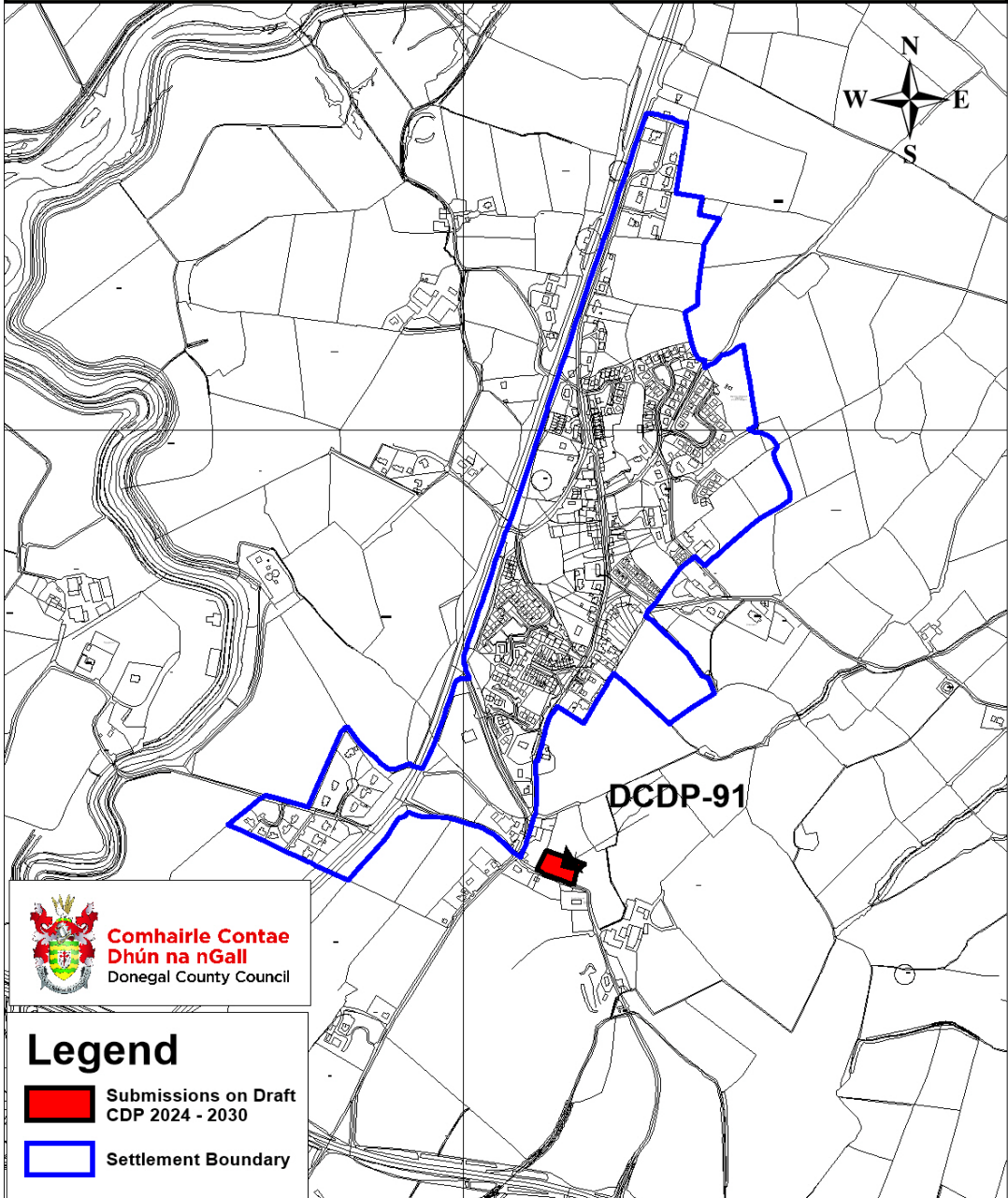
It is not recommended that the subject area be included within the settlement framework boundary of Kilmacrennan.

MANORCUNNINGHAM

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

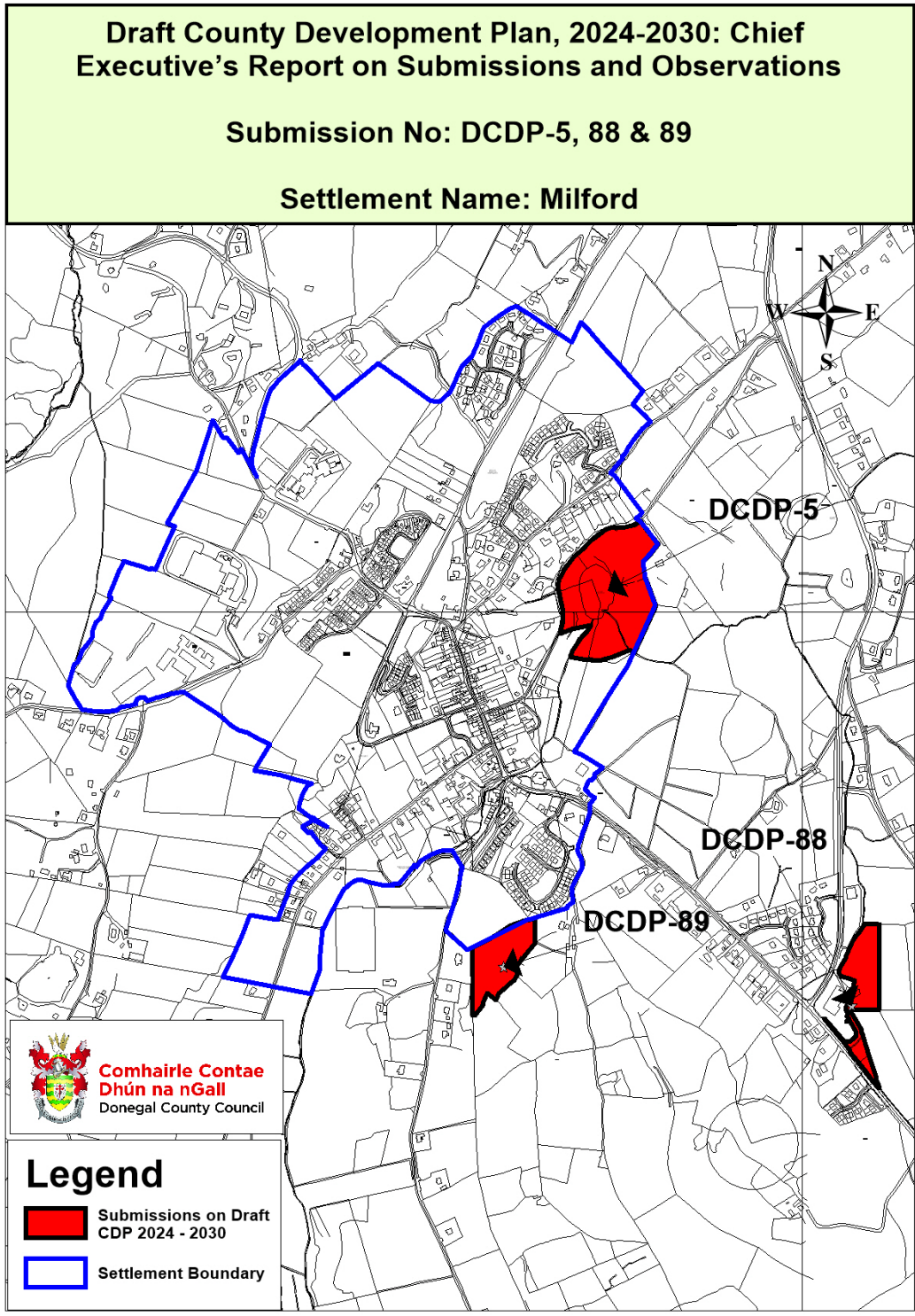
Submission No: DCDP-91

Settlement Name: Manorcunningham



Name/Submission Ref. No.: DCDP-91 Anita and Jamie Friel
<p>Proposal/Rationale:</p> <p>Seeks inclusion of their lands Raymoghly within the Manorcunningham Settlement Framework boundary. States that the site is currently very close to the SF boundary, the site entrance is off the L-6044-3 local road, the area is characterised by housing estates and one off dwellings, comprises a derelict semidetached cottage. It notes that the land was bought at a premium during the boom years but is undevelopable for multiple housing due to its current zoning.</p>
<p>Planning History:</p> <p>No recent planning history on the subject site.</p>
<p>Chief Executive's Response:</p> <p>The subject site is located at a peripheral location vis-à-vis Manorcunningham village, is an approximately 750m/12 minute walk uphill to Browne's Shop on the Main Street, is accessed via a narrow single lane road without footpath, and is serviced by a watermain but not a public sewer. The site is not located within any ecological designations or the HEFS Flood Zone A and B and does not contain any architectural features but is partially within the Site and Monument Record Zone of the adjoining Raymoghly Old Graveyard (NIAH 40827009 refers).</p> <p>On the basis of the peripheral location and largely unserviced nature of the site, and the significant amount of serviceable/developable land available within the existing SF boundary it is considered that the inclusion of the site (and the intervening lands) within the SF boundary would hinder the creation of a compact urban form, sustainable mobility and facilitate unsustainable development at a poorly serviced location. Accordingly, it is not agreed that the site should be included within the Settlement Framework boundary of Manorcunningham.</p>
<p>Chief Executive's Recommendation 21L.2:</p> <p>It is <u>not</u> recommended that the site should be included within the Settlement Framework boundary of Manorcunningham.</p>

MILFORD



Name/Submission Ref. No.: DCDP-5 Martin and Gretta McHugh**Proposal/Rationale:**

Seeks the removal of the remaining amenity zoning owned by their family in Milford. Notes that part of the zoning was previously removed in the Draft CDP. States that the reason for this request is that we have been trying to get planning permission for a house for their son and hopes to apply again once the CDP is made. Encloses previous correspondence regarding the matter.

Planning History:**Overall landholding:**

- 20/51475 Permission Martin and Gretta McHugh Dwelling – Incomplete Application
- 20/51588 Permission Martin and Gretta McHugh Dwelling – Refused (Contrary to Amenity zoning objective and limited private open space/integration into adjacent landscape)

Chief Executive's Response:

The portion of the amenity zoning which resulted to the refusal of a dwelling under 20/51588 was previously removed during the formulation of the Draft CDP 2024. This would in turn facilitate the consideration of a dwelling on said lands for their son or otherwise. This submission is in addition to the de-zoning of said site and seeks the removal of the amenity zoning from additional lands owned by their family.

The zoning objective for Amenity is set out in Table 15.2 (P.363) of the plan as follows:

LAND USE ZONE	OBJECTIVE
Amenity	To reserve and enhance land for formal and informal amenity and open space purposes, and to make provision for new recreation, leisure and community facilities

Land zoned amenity within Settlement Frameworks broadly constitute lands which have an inherent environmental and/or visual amenity which are to be reserved for amenity and open space purposes and to make provision for new recreation, leisure and community purposes.

The subject lands consist of Lough Napuckan and adjoining wetland, woodland, semi natural grassland and other habitat. The lands are visible from the adjoining Lough Road and residential developments to the north west and display a picturesque Lakeland setting.



As such it is considered that the lands have an inherent environmental and visual/scenic value and would thus provide an important amenity for Milford residents and may provide future recreational potential in terms of lakeside walks/green areas. Furthermore on the basis of the low lying, wetland nature of much of the site, and the absence of a footpath along the Lough Road it is considered that

much of said lands are unsuitable are one off dwellings and/or multiple residential development. Accordingly, it is not agreed that the amenity zoning of the lands should be removed.

Chief Executive's Recommendation: 21L.3

It is not recommended that the amenity zoning of the subject lands should be removed.

Name/Submission Ref. No.: DCDP-88 Property Rentals Limited
<p>Proposal/Rationale:</p> <p>Seeks the re-zoning of the subject lands from a rural area to commercial. States that the site is located within a commercial hub with supermarket outside the Settlement of Milford, is accessed off the R245, and is serviced. It notes that the area is characterised by housing estates and commercial properties and the sites are ready for future development. Provide a synopsis of the planning history for the sites. Notes that the development permitted under 07/51090 is completed with substantial car parking, lighting and footpath and it serves the Milford, Ramelton, Downings, Kilmacrennan, and Rathmullan and Fanad areas. Notes that a right turning lane serves the development. Further states that a diner, petrol station and office were granted on the southern portion under 08/50524 and the lands were raised significantly.</p> <p>Opines that the current zoning of these lands results in the land only being suitable for one off dwellings. States that their client wishes to further develop both sites for commercial use to include more retail units and offices space. Considers the current zoning to be unreasonable and notes that the lands were within the Control Points of Milford in the CDP 2006-2012. Finally states that it was always their client's intention to construct phase 2 option to the existing commercial site, and it not viable for these sites to be used for any other purpose.</p>
<p>Planning History:</p> <p>Northern Portion of Site</p> <ul style="list-style-type: none"> • 07/51090 Permission PJD Construction 12 retail Units and 12 Office Buildings, and connection to public sewer – Granted • 13/50627 Extension of Duration for 07/51090 – Granted. • 21/50038 Permission Modifications to Elevations and Change of Use from Commercial Units to Church for 2 no. Units within existing Building – Granted. • 21/50404 Permission Ciaran Blaney COU of Commercial Unit to Restaurant – Granted. • 21/50475 Permission Karen McGettigan Change of Use of Commercial Unit to Café – granted • 21/52232 Milford Property Rentals Ltd Modification to Elevations to Building 2 and Advertisement Sign – Granted. <p>Southern Portion of Site</p> <ul style="list-style-type: none"> • 07/50932 Permission PJD Construction Retentional land fill, Discount Retail Unit, Petrol Station with 2 Offices – Granted • 08/50524 Permission PJD Construction Revise, Extend And Reposition Petrol Station Retail Unit Approved Under 07/50932 – Granted • 13/50624 Extension of Duration for 08/50524 Refused on basis that that the development was no longer consistent with the retail objectives for the area in the CDP 2012.
<p>Chief Executive's Response</p> <p>In the Draft CDP lands commercial lands are identified in urban locations in the Buncrana, Ballybofey/Stranorlar and Bundoran. Otherwise, subject to certain exceptions, commercial developments (e.g. offices, light industrial, and warehousing etc), are generally favoured within urban areas under Chapter 7 Economic Development. Furthermore, it is important to note that:</p> <ul style="list-style-type: none"> • The achievement of compact growth and sustainable mobility are National Strategic Outcomes (NSO) of the National Planning Framework (NPF). • The Retail Planning Guidelines 2012 aim to inter alia promote the vitality and viability of city and town centre and sets out a sequential approach which identifies city and town centres as the preferred location for new retail development. • The Governments Town Centre First policy aims to create town centres which function as the '<i>business, service, social, cultural and recreational hub for the local community</i>' (Section 3.1 refers) <p>The subject site is located approximately 772 metres outside the existing settlement framework boundary of Milford, a 12min walk from Milford town centre, is accessed via the adjoining R245</p>

regional road, continuous footpath access is available from the site to the town of Milford along said road, and the site is serviced by an existing sewer and watermain.

Notwithstanding the previous planning history and the overall serviceability and developability of the site it is considered that further commercial development at this location would.

- Hinder the ability of Milford to create a compact consolidated urban form and would thus be contrary to the NPF's National Strategic Outcome of Compact Growth
- Result in further car dependent development at a location practically inaccessible by active travel from centres of residential population and would thus be contrary to the national strategic outcome of sustainable mobility.
- Further exacerbate urban sprawl at a location significantly removed from the settlement of Milford and thus further erode the rural character of the area and the distinction between rural and urban areas.
- Impede the ability to Milford to develop a vibrant and viable town centre environment, regenerate town centre sites and tackle the high levels of town centre vacancy and dereliction and thus be contrary to the central aims of the Retail Planning Guidelines 2012 and the Governments Town Centre First Policy. In this regard it is likely that the extensive commercial developments previously permitted on this site may have displaced retail/commercial development from the town centre.

In addition, there are also significant remaining infill, brownfield and greenfield opportunities for commercial development within the existing Settlement Framework Boundary.

Consequently, it is not agreed that the lands should be zoned as commercial within the Draft CDP 2024.

Chief Executive's Recommendation 21L.4:

It is not recommended that subject lands be zoned as commercial within the Draft CDP 2024.

Name/Submission PJD Constructions Ref. No.: DCDP-89**Proposal/Rationale:**

Seeks the inclusion of the subject lands within the with the Settlement Framework boundary of Milford. Notes that the site would be accessed via Lough Fern Heights, the area is characterised by multiple residential development and one off dwellings, and the lands are serviced. States that permission was granted for 28 dwellings, 8 apartments and a creche under 08/50219 and the land was extensively excavated, some foundations were put in place and services brought into the subject lands. States that the currently zoning result the in the land only being suitable for one off dwellings, the site was purchased for premium during the boom, and it was always their client's intention to extend the housing estate into these lands. States that their client is able to apply for planning permission and commence development and has recently completed 17 no. dwellings in Lough Fern Estate. Further argues that the site is within walking distance of Milford and there is a severe lack of housing in Milford.

Planning History:

- 08/50219 Patrick Doherty Permission 10 Semi Detached Dwellings, 22 Townhouses, , 2 Apartments, Water Reservoir, Creche – Granted
- 13/50625 Extension of Duration for 08/50219 – Refused on the basis that the development was not outside the settlement boundary of Milford.

Chief Executive's Response:

The subject site is located immediately to the south of the Milford Settlement Framework Boundary, the Lough Fern Heights Housing Estate and approximately 450m/6 min walk/2 min cycle from Milford Town Centre, is accessed via the roads and footpaths within said estate and is serviceable by the 225mm UPVC sewer and 100mm uPVC watermain within said estate. The site otherwise has been previously excavated, does not contain any ecological, architectural, or archaeological designations/features and is not located within the HEFS Flood Zone A and Flood Zone B. Furthermore, the site is broadly equidistant from the town centre vis-a-vis a number of other serviceable and developable sites within the existing Milford SF boundary. Finally, whilst elevated, as the site has already been excavated any dwellings are unlikely to visually break the skyline when viewed from the R246 Kilmacrennan road (see below).



Consequently, on the basis of inter alia the site's relatively compact and accessible location and serviced nature, the absence of any precluding designations/features, its similar distance from the town centre vis-à-vis a number of other zoned sites, it is agreed that the site should be included within the Milford Settlement Framework Boundary.

Chief Executive's Recommendation 21L.5:

It is recommended that the Milford Settlement Framework Boundary be extended to include the subject site.

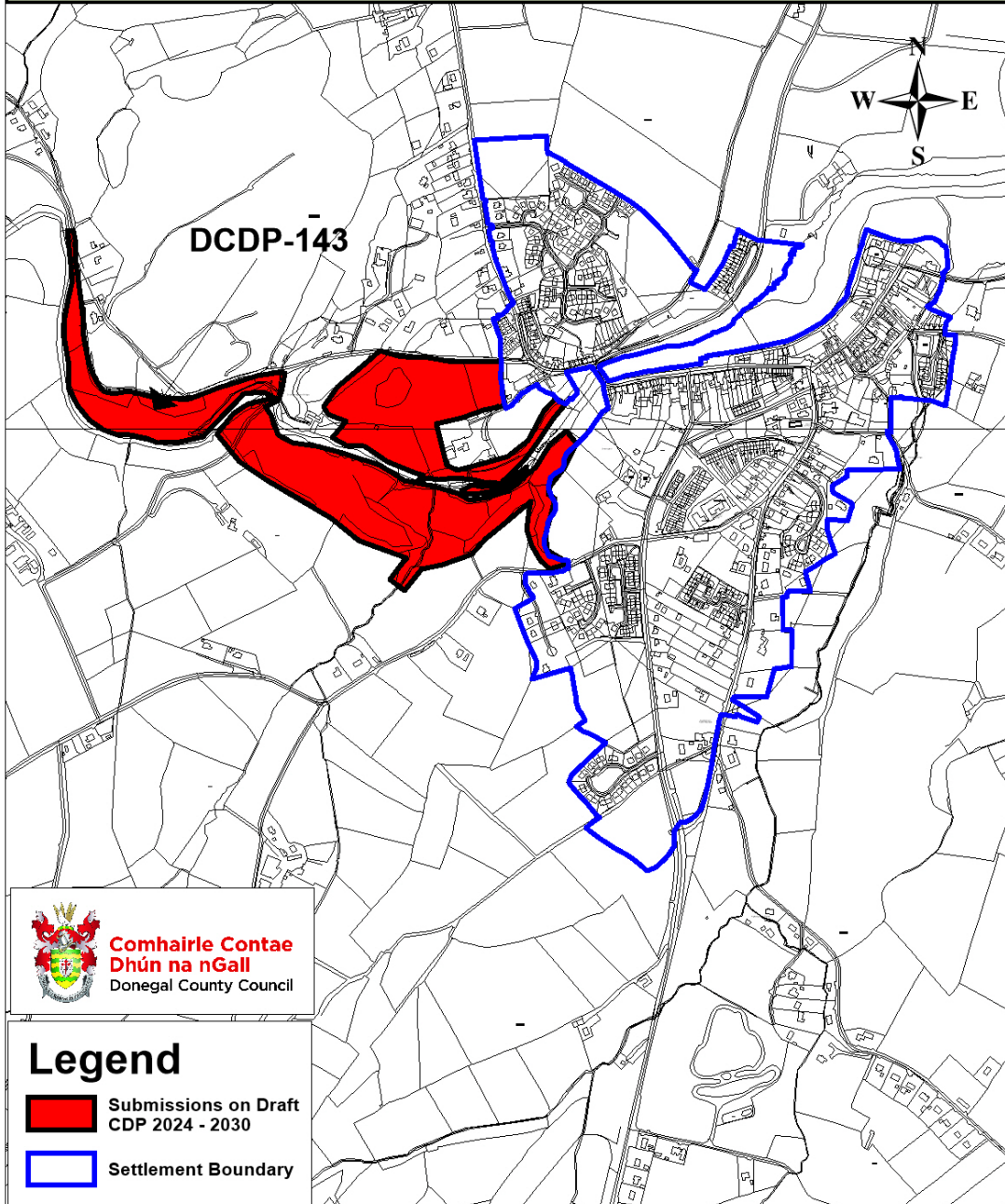
(This is considered to be a material alteration.)

RAMELTON

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-143

Settlement Name: Rathmelton



<p>Name/Submission Ref. No.: DCDP-143 PCI Commercial Limited</p>
<p>Proposal/Rationale:</p> <p>Seeks the rezoning of the subject lands to allow the development to be delivered</p> <p>States the development involves the:</p> <ul style="list-style-type: none"> • A small number of high quality residential units to the west of the existing SF Boundary • Renovation/restoration/improvement of cottages on Green Lane, • Development of the Salmon Fishery • Provision of walkways through woodland. <p>Note that planning for previously refused by ABP for 87 high density dwellings. States that project promoters have engaged extensively with stakeholders and advisors.</p> <p>Opines that the current zoning is unreasonable as the proposal is inter alia:</p> <ul style="list-style-type: none"> • Consistent with the Ramelton Action Plan and represents a heritage led regeneration, and the Consistent special economic function of Ramelton in the CDP 2018, • Aligns with TV-O-1 and TV-O-2 of the CDP 2018 vis-à-vis supporting renewal/regeneration and maximising economic potential. • Compliments TV-O-4 and TV-O-5 in improving the physical environment of town and villages and encouraging positive placemaking, • Addresses vacancy. • Provides small scale residential development.
<p>Planning History:</p> <p>Area Immediately to West of Existing SF Boundary 007554 Permission SAVANNE LTD 20 Dwellings – Decision to Grant by DCC, Appealed to ABP Withdrawn</p>
<p>Chief Executive's Response:</p> <p>The subject lands consist of sloping agricultural fields, a terrace of derelict/vacant cottages, pockets of deciduous woodland, lowlying grassland adjoining the River Leannan, and the wooded riverbanks/valley of the River Leannan.</p> <p>The development of the Salmon Fishery and the provision of walkways through woodland are open to consideration in both urban and rural areas under the Draft CDP 2024 (e.g. via CC-P-1 and CC-O-2) and do not require the extension of the Ramelton Settlement Framework boundary (which would otherwise facilitate other forms of development unconnected to said specific proposals).</p> <p>Otherwise, the submission proposes 3 distinct residential developments. The key element and planning related characteristics of same are set out below.</p> <ul style="list-style-type: none"> • Phase 1 provides for the 'restoration' of the RPS 4080014 (Detached multiple-bay single-storey rubble stone former weaving house)/NIAH 40800208 (Detached twelve-bay single-storey former linen processing/weaving sheds into 5 no. self catering cottages. • The Phase 2 (28 no. Housing Units) area is situated on a sloping agricultural field directly adjoins the existing SF boundary and approximately 372m from the designated town centre of Ramelton. It is serviced by a 150mm public water main and is accessible from the adjoining local road to the north. It requires a public sewer extension of approximately 58metres and a footpath extension of 40 metres but continuous footpath access would otherwise be available to Ramelton town centre. • The Phase 3 (Clachan Style Cottages) area is situated on sloping land bounded by pockets of mature deciduous and located approximately 552m from the designated town centre of Ramelton, is serviced by a 150mm public water main and road access is available from the adjoining local road to the north. However, the site is not serviced by the public sewer and there is no exiting footpath access. • The Phase 4 (Development Opportunities for large private dwellings) area is situated on a sloping agricultural field approximately 372m from the designated town centre of

Ramelton, is serviced by a 150mm public water main and road access is available from the adjoining local road to north. However, it would require a public sewer extension of approximately 150m and a footpath extension of approximately 140m.

The Phase 1,2,3 and 4 areas are all located within the proposed Ramelton Architectural Conservation Area. (ACA). RPS 40800305 is located immediately to the south of the Phase 1 and 2 areas and Kelly's Mill is located to the south west of the Phase 3 area. The Phase 3 area adjoins both the River Leannan SAC and the Lough Fern proposed Natural Heritage Area. None of the sites are located within the HEFS Flood Zone A or B.

The Phase 1 and 2 areas are in a relatively, sequential, compact and serviceable location adjacent to the village centre. However, it is imperative that any multiple residential within this area should preserve the special character and sense of place of the host Architectural Conservation Area and any proposed refurbishment of RPS 4080014 should; be heritage led, not materially harm/affect the character of the host structure, and not impinge upon its visual setting. In this regard the proposed layout of the multiple residential development (in Phase 2) and refurbishment of RPS 4080014 (in Phase 1) as detailed in the submission are not acceptable. In addition, given the narrow width of the Green Lane it is considered that any vehicular access to the phase 3 area should be from the local road to the north and that Green Lane should only be utilised as an upgraded active travel link to the development. Nevertheless, it is considered that subject to the proposed policy safeguards detailed below the Phase 1 and Phase 2 area should be included within the Settlement Framework of Ramelton.

However, on the basis of the unserviced nature, non-sequential location of the Phase 3 and 4 area and the availability of other existing regeneration, infill and brownfield opportunities for residential development within the existing built-up area of Ramelton it is not agreed that the subject lands should be included within the Ramelton Settlement Framework Boundary.

Chief Executive's Recommendation_21L.6:

Include the lands outlined in blue below within the Ramelton Settlement Framework Boundary



Insert the following policy into Chapter 21- Settlement Frameworks

SF-P-1

Ensure that any development occurring within the area outlined in blue in the map below in Ramelton:

- a) Preserves the special character and sense of place of the host Ramelton Architectural Conservation Area.

- b) Provides vehicular/footpath access solely via the R249 to the north and a separate additional active travel only linkage along the 'Green Lane' to the south as far as the existing footpath in Ramelton village.
- c) Does not materially harm/affect the character of RPS 4080014, provides for the sensitive heritage led regeneration of said structure, preserves the visual setting of said structure and provides a substantial setback and appropriate screening between it and any new development.



(This is considered to be a material alteration.)

LIFFORD-STRANORLAR MD AREA SETTLEMENT FRAMEWORK SITE-SPECIFIC SUBMISSIONS MD

The settlements that are the subject of such submissions are listed below:

- Convoy
- Killygordon (Crossroads)

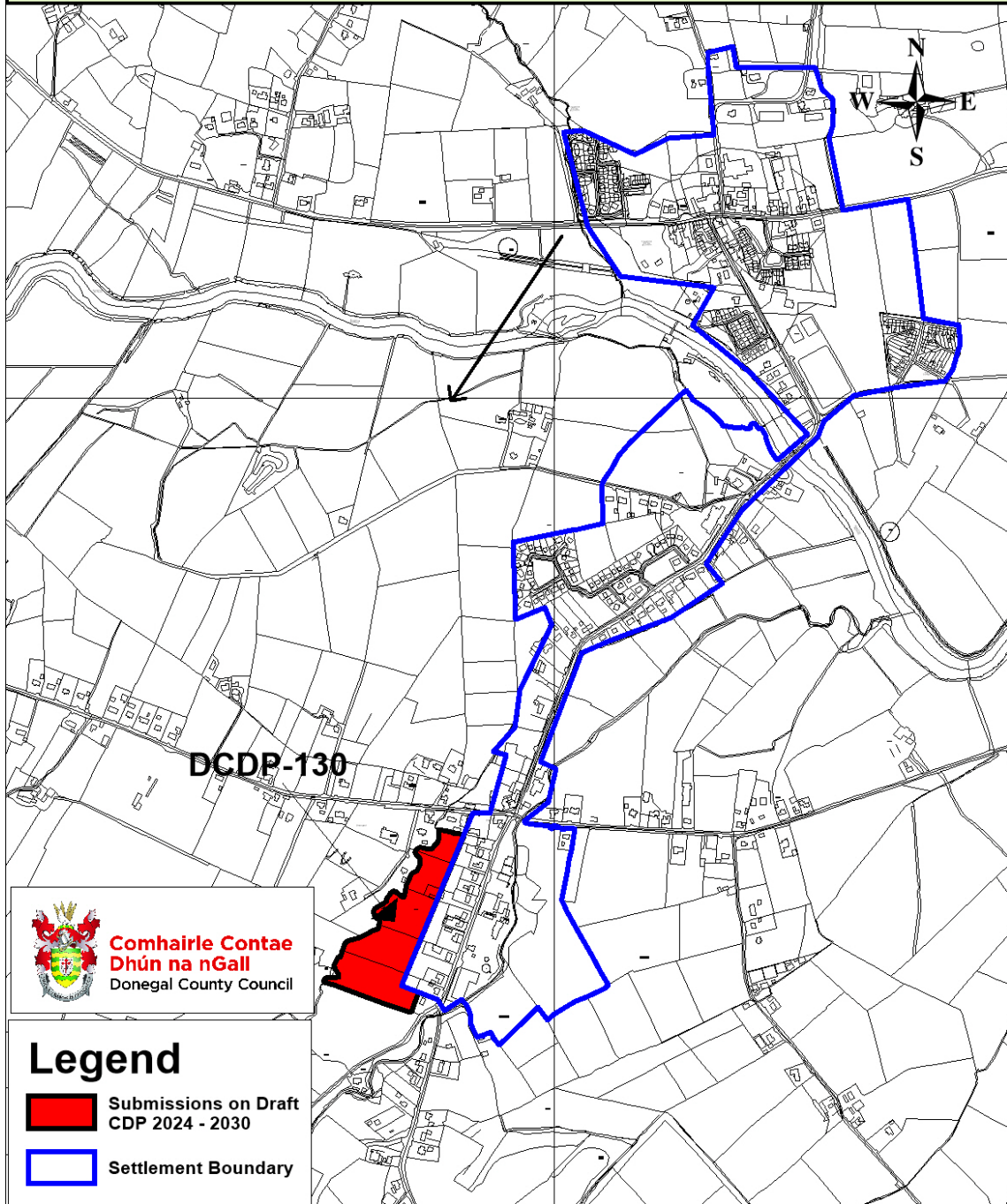
KILLYGORDON (CROSSROADS)

Name/Submission Ref. No: Woodbine Cottage Ltd. DCDP-130
<p>Proposal/Rationale:</p> <p>Submission seeks the extension of the settlement framework boundary on lands located immediately adjacent to Crossroads junction. The submission contends:</p> <p><i>'(It would) provide opportunities for natural progressive growth for single houses sited at a similar density to those which address the public road. These lands have already been opened up for development of single houses to the rear of existing established houses where evident development has commenced however excluding the lands from the settlement framework map prevents family members and others from developing sites for single houses on lands to the rear of their parents or family members lands. Currently as rural lands, development of same is not supported by the Planning Authority as it is considered as back land development and given its proximity to the adjoining Village, and having footpath infrastructure in place to access nearby School, Creche, Shops and the Village Core, development of these lands would present natural growth of the village and provide an opportunity for the Planning Authority to control development on the basis of extension of the public sewer. It is considered that any further development of these lands should be a based on a developer lead solution of providing / extending the existing public sewer to the property and that way the entire settlement shall be suitably serviced. Lack of inclusion of these lands will mean that there is no demand for extension of essential services as no lands exist for any sort of development purpose. As we act for a single landowner only those lands are outlined in this submission but including the adjoining lands is what is suggested herein.'</i></p>
<p>Planning History:</p> <p>No relevant planning history on subject lands.</p>
<p>Chief Executive's Response:</p> <p>Whilst the lands are located close to the village centre, the development of 'single houses to the rear of existing established houses' as referenced in the submission and of the scale that would be enabled by the extent of lands identified in the submission would not provide for orderly development and efficient use of lands.</p>
<p>Chief Executive's Recommendation 21L-S.1:</p> <p>Not to amend the Plan.</p>

Draft County Development Plan, 2024-2030: Chief Executive's Report on Submissions and Observations

Submission No: DCDP-130

Settlement Name: Killygordan



CONVOY

Name/Submission Ref. No: Woodbine Cottage Ltd. DCDP-16
<p>Proposal/Rationale:</p> <p>Submission seeks the extension of the settlement framework boundary on lands located immediately adjacent to the town centre.</p>
<p>Planning History:</p> <p>No relevant planning history on subject lands.</p>
<p>Chief Executive's Response:</p> <p>Having regard to the immediate proximity of the site to the village, this proposal is agreed.</p>
<p>Chief Executive's Recommendation 21L-S.2:</p> <p>Amend the settlement framework boundary to include site as identified in the submission.</p> <p>(This is considered to be a material alteration.)</p>

Appendix A: Draft Letterkenny Plan and Local Transport Plan: Proposed Material Alteration 1

<p>MA1</p>	<p>Chapter 10 – Housing, Sections 10.2.1,</p>	<p>Revise the narrative of the plan with respect to population projections/housing supply targets/zoned land provision, as follows –</p> <p>New text coloured blue, deleted text in red-strikethrough:</p> <p>10.2 Overall Supply and Additional Provision</p> <p>10.2.1 Overall Supply</p> <p>The housing and population targets in the Letterkenny plan are based on the Core Strategy of the County Development Plan 2018-2024 (see table 10.1 below).projections contained in the National Planning Framework and the NWRA’s Regional Spatial and Economic Strategy. As noted in Section 1.1, the Letterkenny Plan has been prepared with a 10-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’. This 2031 horizon allows for a more holistic view of the development of the Regional Centre and takes into consideration the potential for longer lead-in times for development of certain sites due to servicing needs, particularly the extensive Strategic and Sustainable Development Site to the south of the town centre. 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.</p> <p>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).</p>
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Table 10.1 Projected population growth in Letterkenny (source: NWRA RSES)

Letterkenny 2016	Letterkenny Uplift 2026	Letterkenny Uplift 2031	Letterkenny 2040
Population: 19300	4400	2200	Population: 27300

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).

Appendix B: List of submissions from Public and Prescribed Bodies

Ref. No.	Name
DCDP-1	John O Donnell
DCDP-2	Derry City and Strabane District Council
DCDP-3	Brian McHenry
DCDP-4	Kenneth Harper
DCDP-5	Martin and Gretta McHugh
DCDP-6	Paul McCallion and Matthew Rudden
DCDP-7	Ronald McGrory
DCDP-8	Sean Hegarty
DCDP-9	Sean Hegarty
DCDP-10	Rob Casey
DCDP-11	Nicolas North
DCDP-12	Defending Environmental Wealth
DCDP-13	Anne Bowden
DCDP-14	Peter Lewis
DCDP-16	Woodbine Cottage Ltd
DCDP-17	David and Susan Crowe
DCDP-18	Hugh Frazer
DCDP-19	Sheila Sharpe
DCDP-20	John Northridge
DCDP-21	Barrack Hill Town Park Steering Ctte
DCDP-22	Richard McClelland
DCDP-23	Seamus Boyle
DCDP-24	An Post
DCDP-25	Defending Environmental Wealth
DCDP-26	Lisa McGeough Campbell
DCDP-27	Patrick Heaney
DCDP-28	Deiree Mules
DCDP-29	Dr W.D. Moore
DCDP-30	Barry Lynch
DCDP-31	Barry Patton
DCDP-32	Longmarsh Developments Ltd
DCDP-33	Peter Watson
DCDP-34	Tony Kitterick
DCDP-35	Evelyn Kitterick
DCDP-36	Marie Molloy
DCDP-37	Mary Anna Wright
DCDP-38	Michael Kearney

Ref. No.	Name
DCDP-39	Anne Bowden
DCDP-40	Anne Bowden
DCDP-41	Therese Ellard
DCDP-42	Grainne Wilson
DCDP-43	Erne Atlantic Way
DCDP-44	Clare Boyle
DCDP-45	Libby Duffy
DCDP-46	Shane McMenamin
DCDP-47	Valerie McNulty
DCDP-48	Una Brown
DCDP-49	Emmett Friel
DCDP-50	Maura Gallagher
DCDP-51	Mary Carr
DCDP-52	Luke Cape
DCDP-53	Discover Bundoran
DCDP-54	Irish Premium Oysters
DCDP-55	Dr Brian Good
DCDP-56	Pobal Eascarrach
DCDP-57	Coiste Pleanála Teanga Na Gaeltacht Láir
DCDP-58	Margaret O Neill
DCDP-59	Daniel Galalgher
DCDP-60	Victor Jervis
DCDP-61	EPA
DCDP-62	Gineadoir Gaoithe Teoranta
DCDP-63	Mulmosog Wind Ltd
DCDP-65	Harley Planning Consultants Ltd
DCDP-66	Randal Hayes
DCDP-67	Mark Carlin
DCDP-68	Mark Carlin
DCDP-69	Bernard Greene
DCDP-70	Bernard Greene
DCDP-71	John McDaid
DCDP-72	Friends of Dunree
DCDP-73	
DCDP-74	Fermanagh & Omagh District Council
DCDP-75	Dr Fiona Harding
DCDP-76	Dunes Property Limited
DCDP-77	Causeway Coast and Glens Borough Council
DCDP-78	Fiona Hurley
DCDP-79	Department of Transport

Ref. No.	Name
DCDP-80	Alan Watson
DCDP-81	Donna Watson
DCDP-82	Rights of Nature
DCDP-85	Ronald Ferguson
DCDP-87	MCF Construction
DCDP-88	Milford Property Rentals Ltd
DCDP-89	PJD Construction
DCDP-90	Anita and Jamie Friel
DCDP-91	Anita and Jamie Friel
DCDP-92	James Friel, Gavin Friel Brendan Friel
DCDP-93	Foylegrange Developments Limited
DCDP-94	Conor Kelly
DCDP-95	Foylegrange Developments Limited
DCDP-96	Foylegrange Developments Limited
DCDP-97	Henry McKinney
DCDP-98	Michael O Duibhir
DCDP-99	Burtonport Harbour Committee
DCDP-100	Conrad Gibbons
DCDP-101	Michael Boyle
DCDP-103	Gas Networks Ireland
DCDP-104	Land Development Agency
DCDP-105	Aldi Stores (Ireland) Ltd
DCDP-106	Erne Atlantic Way
DCDP-107	Pauric O Flaherty
DCDP-108	Edward Gallagher
DCDP-109	Abi Storey
DCDP-110	Marius Narmontas
DCDP-111	Shaun Doherty
DCDP-112	Energia Renewables
DCDP-113	Tommy Burns
DCDP-114	M Healy
DCDP-115	Maurice Timony
DCDP-116	Jennifer McLaughlin
DCDP-117	Jennifer McLaughlin
DCDP-118	Michael O Duibhir
DCDP-119	McCormick Builders
DCDP-120	Diarmuid Doherty
DCDP-121	Emmet Doherty
DCDP-122	Cathal Grimes
DCDP-123	Martin McLaughlin

Ref. No.	Name
DCDP-124	John McHugh
DCDP-125	Mary Coughlan
DCDP-126	John Coughlan
DCDP-127	BASICC
DCDP-128	OPW
DCDP-129	John Mulcahy
DCDP-130	Jonathon Bradley
DCDP-131	Canavan Hospitality
DCDP-132	Lorna Barron
DCDP-133	Rockfield Community Co-op Ltd
DCDP-134	Grace Canavan
DCDP-135	Joseph Brennan
DCDP-136	Hillary Fletcher
DCDP-137	Michael McGlinchey
DCDP-138	Uisce Eireann
DCDP-139	Bundoran Community Development CLG
DCDP-140	Northwest Energy Park
DCDP-141	Electricity Supply Board
DCDP-142	W.P. Kearns Ltd
DCDP-143	PCI Commercials
DCDP-144	Cloghercor Wind Farm Ltd.
DCDP-145	Inishowen Development Partnership (IDP)
DCDP-146	Cloghore Area Residents Group
DCDP-147	Denis Doherty
DCDP-148	Transport Infrastructure Ireland
DCDP-149	Planree Ltd.
DCDP-150	J Hegarty
DCDP-151	Brian Kavanagh
DCDP-152	Lance Feaver
DCDP-153	Derek Murphy
DCDP-154	James McLaughlin
DCDP-155	Sarah O Gara
DCDP-156	Simon Latham
DCDP-157	Stephanie Porter
DCDP-158	Kate Mc Colgan
DCDP-159	Brendan Porter
DCDP-160	Michele Clements
DCDP-161	Patricia Grant
DCDP-162	Rosemary McArt
DCDP-163	Rosemary McArt

Ref. No.	Name
DCDP-164	Mairi Maguire
DCDP-165	Concerned Local Residents
DCDP-166	Tommy Boyle
DCDP-167	Anne Hillard Murphy
DCDP-168	Ann Ryan
DCDP-169	Aaron Bennett
DCDP-170	Mary Mc Kinney
DCDP-171	Manus Brennan
DCDP-172	Rosemary Quinn
DCDP-173	Gerard McGinley
DCDP-174	Gloria McGinley
DCDP-175	Joe Ryder
DCDP-176	Caroline Cunliffe
DCDP-177	Edel Moore
DCDP-178	Development and Construction Ltd
DCDP-179	Development and Construction Ltd
DCDP-180	Sharron Maria O Donnell
DCDP-181	Kevin Doherty
DCDP-182	Kate Morgan
DCDP-183	Department of Housing Local Government and Heritage
DCDP-184	Evelyn Sharpe, Martina McCarrick, Kieran McGurran, Seamus McGurran, Alan McGurran
DCDP-185	Foyle Port
DCDP-186	Irish Farmers Association
DCDP-187	Patricia McCallum
DCDP-188	Anne Blanchard
DCDP-189	Fáilte Ireland
DCDP-190	Wind Energy ireland
DCDP-191	Tommie and Sadie Doherty
DCDP-192	Diane Mc Corkell
DCDP-193	Collooney Developments Limited
DCDP-194	EBV Construction Limited
DCDP-195	Alice Gallinagh
DCDP-196	EBV Construction Limited
DCDP-197	Ailís Ní Rinn
DCDP-198	EBV Construction Limited
DCDP-199	Juliana Brown
DCDP-200	Finnbarr Murphy
DCDP-201	Oisin Murphy
DCDP-202	Shamus Kelly

Ref. No.	Name
DCDP-203	Fidelma Mc Laughlin
DCDP-204	Emile de Nijs
DCDP-205	James and Darina Barrett
DCDP-206	Niall Barrett
DCDP-207	Mary O Donnell
DCDP-208	Seosamh O Ceallaigh, Madge Curran, Michael Geaney
DCDP-209	Eddie Gallagher
DCDP-210	Clavinova Investments Ltd
DCDP-211	Office of the Planning Regulator (OPR)
DCDP-212	Niall and Siobhan Cullen
DCDP-213	Grace O Donnell
DCDP-214	N Turner
DCDP-215	Cllr Barry Sweeny
DCDP-216	Zoe McCloskey
DCDP-217	Janice Steele
DCDP-218	Laurence McColgan
DCDP-219	Tom O Donnell
DCDP-220	Eamon Barrett
DCDP-221	Eamon Barrett
DCDP-222	Finlay Lynch
DCDP-223	John and Rory Shevlin
DCDP-224	FuturEnergy Ireland
DCDP-225	Paddy Gallanagh
DCDP-226	Harkin Developments Ltd
DCDP-227	Kate Doherty
DCDP-228	Dermot Gildea
DCDP-229	Thomas Keogh
DCDP-230	Miriam Ryan
DCDP-231	Roger Garland
DCDP-232	Fiona McKeown
DCDP-233	John and Rory Shevlin
DCDP-234	Anne Marie Woods
DCDP-235	Michael Grant
DCDP-236	Conlan Barrett Auctioneers Ltd
DCDP-237	Maureen McNulty
DCDP-238	Andrew O'Byrne White
DCDP-239	National Transport Authority
DCDP-240	SSE plc
DCDP-241	Shane McBrearty
DCDP-242	Deva Evans

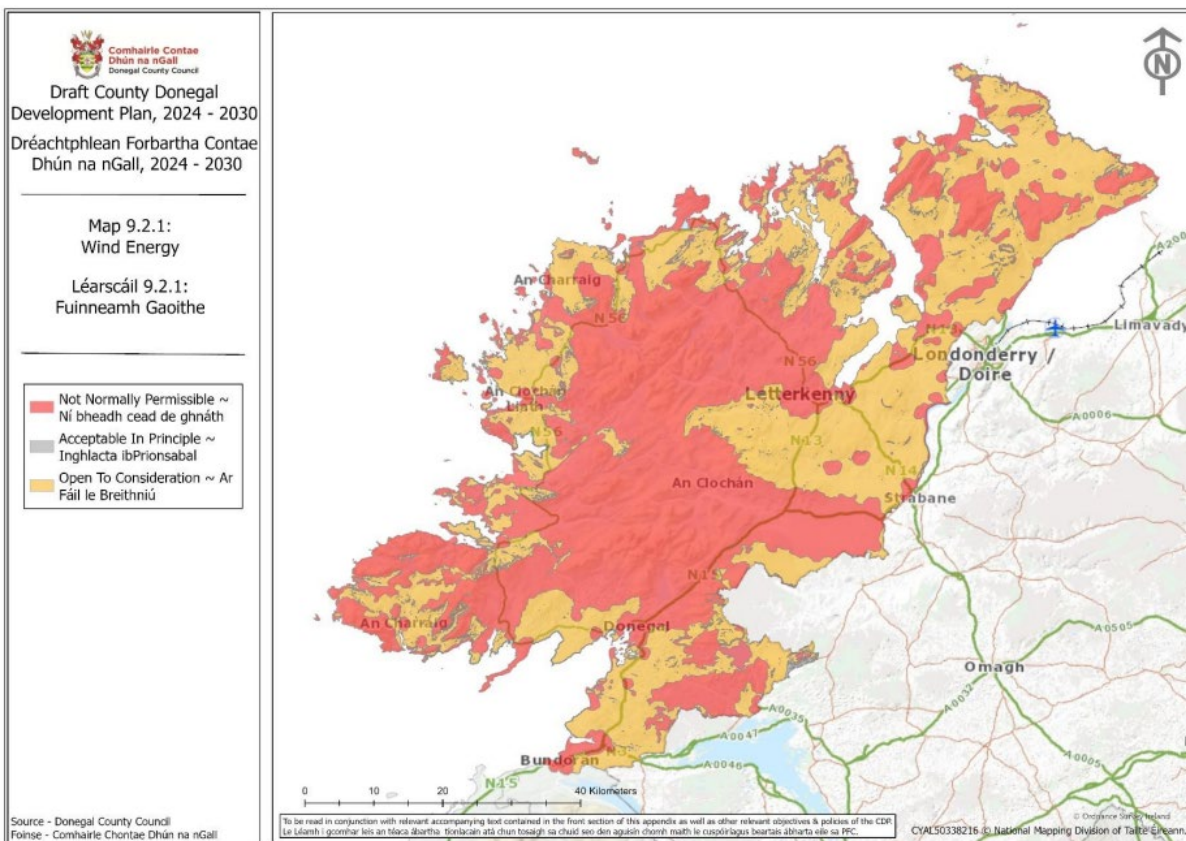
Ref. No.	Name
DCDP-243	Dan Keeley
DCDP-244	Loughs Agency
DCDP-245	Breege Galbraith
DCDP-246	Breege Galbraith
DCDP-247	Beth Evans
DCDP-248	Breege Galbraith
DCDP-249	James Keenan
DCDP-250	Professor Alun and Mrs Kate Evans
DCDP-252	Renewable Energy Systems Limited
DCDP-253	ABO Wind
DCDP-254	Redress Focus Group for Temporary Accommodation
DCDP-255	Dominic McGroddy
DCDP-256	Declan Brennan
DCDP-257	Brid Friels
DCDP-258	Charles Roarty
DCDP-259	Department of Infrastructure Northern Ireland
DCDP-260	Charles Roarty
DCDP-261	TRE Energy Holdings Ltd
DCDP-262	Northern and Western Regional Assembly
DCDP-263	Brian Carr
DCDP-264	Department of Education
DCDP-265	Department of the Environment, Climate and Communications
DCDP-266	Juliana Brown
DCDP-267	Sínead Moore
DCDP-268	Martin Moore
DCDP-269	Mary Moore
DCDP-270	Ken Moore
DCDP-271	Very Rev Fr. John Moore PP
DCDP-272	Teresa Mc Gee
DCDP-273	Shay Mc Callion
DCDP-274	Declan Heaney
DCDP-275	Andrew Moore
DCDP-276	Jean O' Flaherty
DCDP-277	St Eunan's College
DCDP-278	St Columba's College
DCDP-279	Rosses Community School
DCDP-280	Coláiste Ailigh Leitir Ceanainn
DCDP-281	Deele College Raphoe
DCDP-282	Cllr Michael Cholm Mac Giolla Easbuig
DCDP-283	Conrad Na Gaeilge

Ref. No.	Name
DCDP-284	Crana College Buncrana
DCDP-285	Rannóg na Gaeilge

Appendix C: Map 9.2.1 Wind Energy Sieve Mapping Analysis

Methodology used for construction of Wind Energy Map 9.2.1

The Wind Energy Guidelines (2006) set out a step-by-step sieve mapping analysis methodology to inform the identification of the suitability of areas for wind energy development by means of a “sieve mapping” analysis applying key environmental, landscape and technical criteria. This methodology was used as a basis for constructing Map 9.2.1: ‘Wind Energy’ below.



As is evident from Map 9.2.1, the county has three wind energy designations, areas that are: Not Normally Permissible, Acceptable in Principle and areas Open to Consideration for Windfarm developments. and the method for arriving at each is set out in detail below.

'Not Normally Permissible' Areas

These areas were constructed using the sieve mapping analysis set out in the Wind Energy Guidelines (2006) by overlaying spatial layers of the highest environmental, scenic and cultural quality including: Natura 2000 sites, areas of European and national protected habitats and species; defined settlements frameworks in the CDP and a 500m buffer around them; Natural Heritage Areas; areas of Especially High Scenic Amenity as designated in the CDP; Glenveagh National Park; Areas of High Landslide Susceptibility; a key landslide event at Meenbog; Ancient Woodlands; Natures Reserves; Freshwater Pearl Mussel Catchments; Ramsar Sites and 'Moderately High and Moderately Low Landslide Susceptibility'

'Open to Consideration' Areas

Development within these areas is not precluded, but may be constrained by one or more environmental or aeronautical considerations that require detailed investigation at the project level. These areas have been identified by overlaying spatial layers that include proposed Natural Heritage Areas; Donegal, City of Derry Airport and Finner Camp's flying constraints; Geological Heritage Sites; Peat Bogs (outside of Natura sites); Natura 2000 site buffers; High Status Objective Catchment Areas and High Scenic Amenity areas.

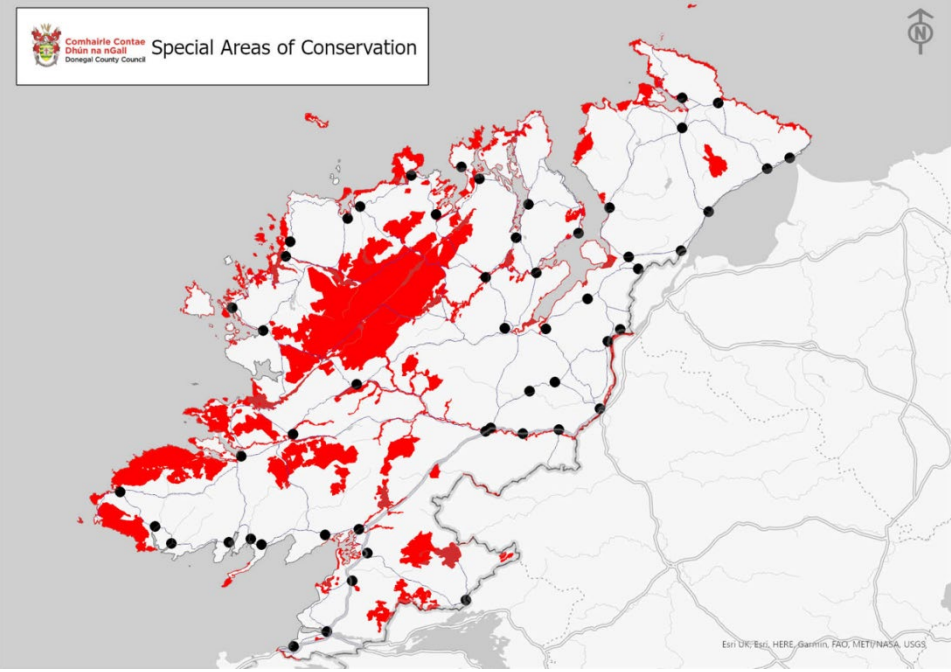
'Acceptable in Principle' Areas

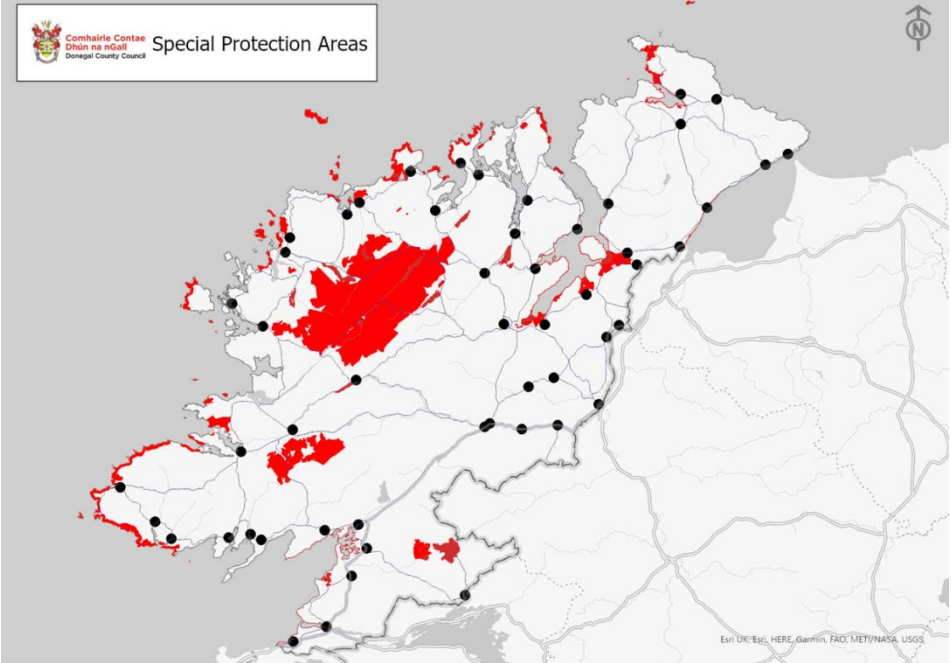
These areas are comprised of those that do not fall within any of the aforementioned constraints spatial layers used in the 'sieve-mapping-analysis'. In the absence of such substantive constraints, these areas are considered to be acceptable in principle for windfarm development, subject to compliance with all other objectives and policies contained within this Plan.

Spatial Data Used for the Sieve-Analysis

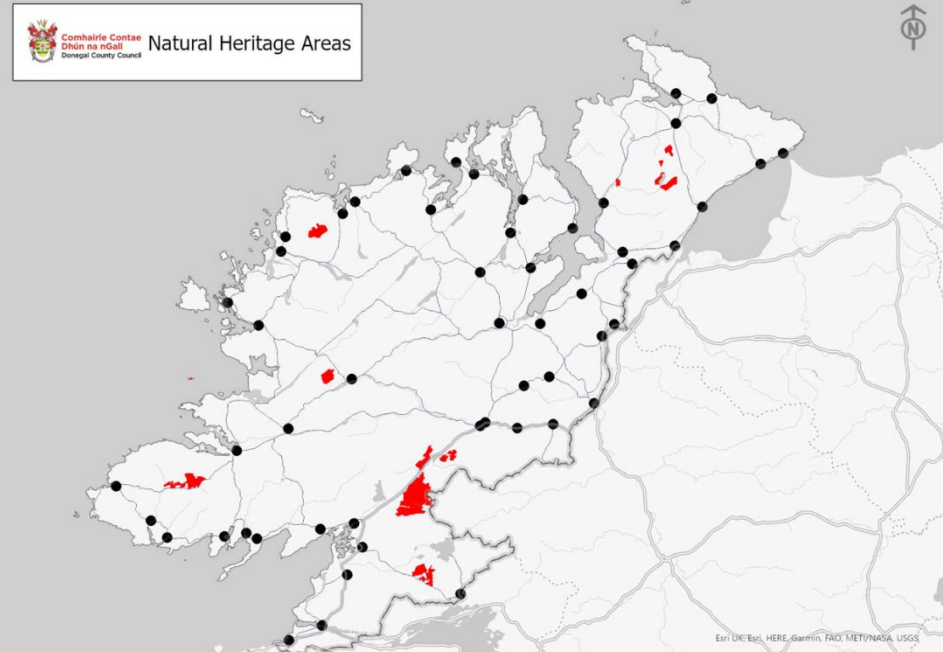
Detailed below are the specific layers of spatial data were overlaid using the objective mapping methodology set out in the Guidelines to arrive at the Wind Energy designations contained within Map 9.2.1 of the Plan. Tables 1 and 2 below show the spatial data layers used in the construction of the 'Not Normally Permissible', 'Open to Consideration' and, consequently, the 'Acceptable in Principle' designations.

Table 1: Individual Spatial Data Layers Used In The Construction of 'Not Normally Permissible' Areas.

Ref	Brief Description of Spatial Data	Image of Spatial Layer
1&2	<p>Natura 2000 sites are European designated sites protected under both the EU Habitats Directive and EU Birds Directive, and also under the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011, as amended by S.I. No. 499 of 2013 and S.I. No. 355 of 2015). Natura sites consist of both Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Member States are required to establish the Natura 2000 network through the designation of these sites, and have an obligation to protect and conserve threatened habitats and species listed under both the Habitats Directive and Birds Directive.</p>	

Ref	Brief Description of Spatial Data	Image of Spatial Layer
		 <p>The image shows a map of Donegal County, Ireland, with Special Protection Areas (SPAs) highlighted in red. The map includes a legend in the top left corner with the Donegal County Council logo and the text 'Comhairle Contae Donegal na h-Éireann Donegal County Council' and 'Special Protection Areas'. A north arrow is located in the top right corner. The map shows a network of roads and several large red-shaded areas, primarily in the central and western parts of the county. A small text at the bottom right of the map reads 'Esri DE: Esri, HERE, Garmin, FAO, NITONASA, USGS'.</p>

Ref	Brief Description of Spatial Data	Image of Spatial Layer
3	<p>Ramsar sites are wetland areas of significant value to waterfowl, and are statutorily protected under the Convention on Wetlands of International Importance (Ramsar) 1971 (as amended 1982 and 1987), and are therefore offered national protection.</p>	

Ref	Brief Description of Spatial Data	Image of Spatial Layer
4	<p>Natural Heritage Areas (NHAs) are a national network of wildlife sites designated by Ministerial order to conserve and protect environmentally important landforms, species, communities and habitats; they are statutorily protected under the Wildlife Amendment Act 2000 (as amended), of national importance, and thereby offered national protection.</p>	 <p>The image is a map of Donegal County, Ireland, titled 'Comhairle Contae Donegal County Council Natural Heritage Areas'. The map shows the county's coastline and internal road network. Several areas are highlighted in red, representing designated Natural Heritage Areas. Numerous black dots are scattered across the county, indicating other wildlife sites. A legend in the top left corner identifies the red areas as 'Natural Heritage Areas'. A north arrow is located in the top right corner. At the bottom right, there is a small text credit: 'Eiri DR: Eiri, HERE, Garmin, FAO, METYNASA, USGS'.</p>