



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

**Chief Executive's Report following the period of  
public consultation on the review of the County  
Donegal Development Plan 2018- 2024 (As  
Varied) as required by Section 11 of the Planning  
& Development Act 2000 (As Amended)**

**Directorate of Community, Development &  
Planning Services**

**July, 2022**

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## Executive Summary

### **Core Strategy, Housing and Urban Regeneration**

The Core Strategy is intended to give spatial expression to the housing, population, land and employment parameters of the County Development Plan (CDP) and should have a focus on the compact growth of our settlements. The Office of the Planning Regulator (OPR) and the Northern and Western Regional Assembly (NWRA) stress the importance of the Core Strategy being framed within national policy frameworks. Thus population targets should follow the National Planning Framework Implementation Roadmap, the provisions of the Regional Spatial and Economic Strategy and the Government's 'Housing Supply Target Methodology for Development Planning Guidelines'. A comprehensive Housing Need and Demand Assessment (HNDA) should be prepared by the Planning Authority to provide an estimate of the type and tenure of housing required (inclusive of specialist housing) over the Plan period and housing policy will be informed by relevant Government guidance and best practice. Allied to the Core Strategy, the new CDP should advocate strongly for the regeneration of our towns and villages via a coordinated and cross-sectoral approach that examines in detail the potential that exists for economic, social and community regeneration. The Core Strategy could support national road policy. It should also respond to the needs of the Gaeltacht.

### **Tourism**

Tourism is recognised as being a critical sector in County Donegal. The new CDP should seek to protect the fundamental landscape, seascape, cultural and built heritage resource underpinning the Wild Atlantic Way and Donegal tourism brands whilst facilitating sustainable and accessible tourism proposals including experience based/resource related and cultural tourism, marine tourism, ancillary tourism infrastructure, quality accommodation offerings and Gaeltacht and Islands tourism.

### **Water and Wastewater**

The sustainable development of County Donegal is heavily contingent on the support of adequate water and wastewater infrastructure. Recent and future investment in such infrastructure is welcomed. However, significant deficits remain and the new CDP should set a policy framework that allows for collaborative working with Irish Water (IW) and other key stakeholders to ensure the alignment of IW Capital Investment Plans with National, Regional and Local planning policy, thereby ensuring the future strategic and sustainable development of towns and villages within the County. The Plan should also serve to protect existing water supply sources to secure supply and in the interests of environmental/biodiversity protection generally. The context in which IW operates is identified, as is a schedule of programmed investment in the County by IW.

### **Renewable Energy**

The importance of renewable energy in tackling climate change, and the associated national obligations/targets for renewable energy production and reduction of greenhouse gas emissions are strongly referenced by statutory agencies, as are national planning policy requirements in this regard. Members recently considered these issues during preparation of the Variation of the CDP 2018-2024 (As Varied) In Respect Of A Wind Energy Policy Framework. The range of different renewable energy sources are referenced, as is the need to consider the environmental assets of the County and impacts on residential receptors in planning for such developments. Onshore opportunities, particularly in Killybegs, arising from offshore wind energy are also raised.

### **Economic Development**

Donegal has many natural advantages in terms of future economic growth, but there are also challenges to be addressed. The new CDP should stress the need for improved inter-regional connectivity and provide further support for the concept of the North-West City Region as a way of contributing towards balanced regional development. Appropriate planning policy support should be given to important sectors such tourism, marine, ICT and digital enterprise, life sciences, agri-tech and agri-food (and farm diversification generally), retail, manufacturing and engineering. The new Plan should seek to provide for proportionate economic growth throughout the County and, to this end, should identify a suitable quantum of zoned land to cater for new and/or expanding commercial enterprises.

### **Transport**

The importance of the County's strategic road network in driving growth and providing connectivity within the County and beyond is emphasised, as is the need to protect these very assets from inappropriate development that would dilute their effectiveness and carrying capacity. The ongoing consultations between the Council and Transport Infrastructure Ireland (TII) with regards to the investigation of possible derogations from the national policy general presumption against new accesses, or intensification of existing accesses, onto national roads where the speed limit is above 60kph is also addressed.

The need for modal shift to more sustainable forms of transport is also flagged in the context of a national policy drive towards more active travel and public transport use and the ramping up of Council activity in this area in the context of the availability of significant national funding streams for such projects.

### **Natural, Built and Cultural Heritage**

The threats to biodiversity both globally and locally are now well recognized. The existing CDP contains a range of biodiversity-related policies and objectives including those related to the protection of: general biodiversity, SACs SPAs, NHAs, Ramsar Sites, Freshwater Pearl Mussel, trees and hedgerows, ecosystems, shellfish waters, peatlands and wetlands as well as the management of invasive species and biodiversity mitigation and it is important that the policy framework for the draft plan would continue to address these biodiversity topics. The wealth and importance, cultural and otherwise, of the built and archaeological heritage of the County is also stressed, together with the need to provide the appropriate levels of protection for them.

## **Climate Change**

The legally-binding climate targets of a 51% reduction in greenhouse gas emissions by 2030 established under the Climate Act are stressed, together with the requirement for objectives to achieve these targets to permeate throughout the entirety of the Plan. This should lead to sustainable settlement and transportation strategies, including reducing energy demand, reducing anthropogenic greenhouse gas (GHG) emissions, and addressing the necessity of adapting to climate change.

## **Marine and the Islands**

The submissions note, inter alia, the critical importance of the fisheries industry/resource and aquaculture in general. Killybegs in particular, being the State's largest fisheries harbour, is noted as being of vital importance. The need for further enabling infrastructure at Killybegs, as well as its possible diversification is referenced and the need for proactive marine spatial planning to consider the opportunities arising from offshore energy in the context of the national renewable energy/Climate Action Plan policy mechanism, but also the need to protect fisheries. The importance of the recreational angling sector is also noted and the use of the precautionary principle is advocated generally when considering the fisheries resource. The new marine area consenting regime that is to be put in place following the enactment of the Maritime Area Planning Act is also referenced in this context.

The importance of marine tourism, and by association the need to provide and maintain facilities that facilitate this sector (e.g. quays, harbours etc.), is also noted in the submissions.

The centrality of the marine sector in terms of the Gaeltacht economy is noted in the submission from Údarás na Gaeltachta, which advocates support for - sustainable aquaculture, development work on Gaeltacht piers, training re. seaweed harvesting, development of a seaweed biorefinery in the Donegal Gaeltacht and incorporation of certain strategic objectives from the National Marine Planning Framework into the new CDP (dealing primarily with environmental impacts, tourism and community development and access to marine and coastal resources).

In terms of development of the islands, the submission from Comharchumann na nOileán Beag highlights the importance of Donegal's islands in terms of tourism and cultural heritage, noting that the Council already has an Islands Committee and states that it would be the perfect vehicle to guide and consult on the Plan.

## **Community, Culture and the Gaeltacht**

**Community:** Key overarching theme to emerge is the importance of community facilities (health, education, childcare, recreation etc.) in accessible locations for the development of sustainable, healthy communities, and the need to support such facilities in the new CDP. This should include accessibility for the disabled and elderly.

**Culture:** Key overarching theme to emerge is the importance of Donegal's rich diverse and unique culture (including: theatre, music, public art, the Irish language and islands culture) and the need to support these elements in the new CDP.

**Gaeltacht:** The Údarás submission outlines the fundamental linguistic and cultural importance of the Donegal Gaeltacht, encompassing an area of 1502km<sup>2</sup> and a population 23,346 (representing 14.7% of Donegal's, and 23.4% of the total Gaeltacht population) and the pivotal role of DCC in supporting implementation of Gaeltacht-associated strategies. Submissions also stress how planning policy can support the Gaeltacht by including and implementing appropriate language proficiency policies in respect of certain types of development in the Gaeltacht. Finally, the designation of An Clochan Liath, Donegal Town and Letterkenny as Gaeltacht Service Towns is also noted.

### **Bundoran**

Key issues covered include: expanding on the tourism offering of the town as a year-round destination; the need to ensure protection of its most important assets including the waterfront area; the need to tackle dereliction; the need to provide housing in suitable locations, and a number of traffic management concerns. The need to carefully manage the location of additional caravan/mobile home facilities (new or expansion of existing) was also referenced.

### **Buncrana**

A key issue identified was how the town can enhance and develop its current offerings and assets to its best advantage, and how the new CDP can support this. How the Plan can help in delivering new housing was also strongly referenced, including: particular comments re the need for residentially-zoned sites to be in appropriate locations in terms of access to infrastructure and services; a need to review existing 'Strategic Residential Reserve' and 'Residential' zones; and the need for the Plan to help with the MICA situation in Buncrana and the wider peninsula. The positive context of the 'Repowering Buncrana' and the renovations at the Leisure Centre are also referenced.

### **Rights of Way**

26 of 28 submissions referring to the topic express concern re the alleged closing off of an alleged existing right of way in the west of the county.

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## Section 1.0 Introduction

### 1.1 Background

On 8<sup>th</sup> April 2022, Donegal County Council gave notice of its intention to review the existing County Donegal Development Plan 2018-2024 (As Varied) [‘the current CDP’] and to prepare a new County Development Plan (‘the new CDP’) for the period 2024-2030, inclusive of:

- (i.) a Local Area Plan for Buncrana;
- (ii.) a Local Area Plan for Bundoran; and
- (iii.) a Settlement Framework Plan for Ballybofey / Stranorlar dealing exclusively with economic development opportunities arising from the TEN-T Priority Route Improvement Project, Donegal.

The process will take up to two years and is prescribed by the Planning & Development Acts 2000 (As Amended) (‘the Act’) which provides, as a first step, for a period of consultation during which time submissions or observations regarding objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area are invited.

### 1.2 Legislative Requirements

#### 1.2.1 Broad Legislative Requirements

In accordance with Section 11(4)(b) of the Act, the Chief Executive’s report is required to:

- List the persons or bodies who made submissions (refer Appendix A) and any persons or bodies who were consulted (refer Appendix B);
- Summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose;
- Give the opinion of the Chief Executive on the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and relevant policies or objectives for the time being of the Government or of any Minister of Government;
- State the Chief Executive’s recommendations on the policies to be included in the draft Development Plan.

#### 1.2.2 O.P.R. and N.W.R.A.

Pursuant to Section 31AM(4)(a) of the Act, this report must also summarise the issues raised and recommendations made by the Office of the Planning Regulator (OPR) and outline the recommendations in relation to the manner in which those issues and recommendations should be addressed in the Draft Plan taking account of the proper planning and sustainable development of the area.

Pursuant to Section 11(4)(bc), the Report must also deal with the submission of the Northern and Western Regional Assembly (NWRA) in a similar manner. The comments of the OPR and NWRA are summarised within each 'Themed Response' section of the report, as required, and the responses of the Chief Executive are also provided within the respective sections.

In line with Section 11(4)(b)(ii), this report is precluded from referring to submissions relating to a request or proposal for zoning of particular land for any purposes.

### 1.3 The Consultation Period

In accordance with Section 11 of the Act, the initial period of consultation commenced on 8<sup>th</sup> April and ran until 3<sup>rd</sup> June, 2022. The review process and consultation period were advertised throughout the County via local newspapers, local radio, the Council's website, Facebook page and Twitter account.

To inform the consultation process, the Council published a pre-draft 'Issues and Options Paper' setting out key issues and questions for the new plan, around topics such as:

- Housing;
- Economic Development;
- Urban Regeneration;
- Transport;
- Water and Wastewater;
- Natural and Built Heritage;
- Climate change;
- Tourism;
- Community issues; and
- An Gaeltacht.

The Issues and Options Paper also set out some of the main challenges and opportunities arising in Buncrana and Bundoran and posed the question as to how the Plan might maximise the economic development opportunities arising from the completion of the TEN-T Strategic Road Project in Ballybofey-Stranorlar.

In addition, 11 public drop-in events to facilitate public consultation with the general public were held across the County over a three week period. These events were advertised via local newspapers, the Council's website, Facebook page and Twitter account. These events were attended by Planning staff and the Issues and Options Papers were on display to facilitate discussion. Facilities were also made available at the drop-in events to make written submissions. Approximately 250 individuals attended across the 11 events.

In total, 100 submissions were received from members of the public together with 20 from prescribed bodies. These submissions were published on the Council's website in accordance with Section 11(3A) of the Act.



## 1.4 How the Report is organised

### Section 2.0: Consideration of Submissions:

Section 2 considers the issues raised in the submissions. Section 2.2 addresses a range of miscellaneous issues raised in specific submissions. Section 2.1 considers issues common to several submissions across a number of themes. Appendix A identifies the names of all those persons/bodies that made a submission and allocates a reference number to each one. Those persons that commented on each theme are then identifiable from the list of reference numbers provided at the start of each 'Themed Response'.

### Section 3.0: Online Survey:

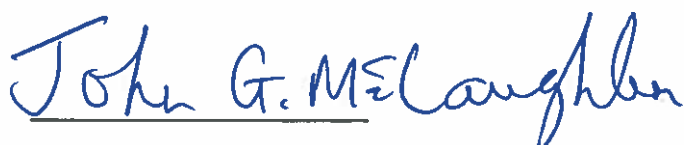
Section 3 summarises the results of an online survey conducted as part of the public consultation process.

## 1.5 Next Steps

In accordance with Section 11(4)(d) of the Act and, following consideration of the Report, Members may issue directions to the Chief Executive regarding the preparation of the Draft Plan. Any such directions must be: strategic in nature; and take account of the statutory obligations of the Council and relevant policies/objectives of the Government and Ministers. Section 11(4)(d) further provides that the Chief Executive 'shall comply with any such directions'.

In this context it should be noted that any strategic directions to be issued by Members to the Chief Executive must be issued not later than 10 weeks after the submission of the Chief Executive's report (Section 11(4)(e)). In order to facilitate Members in their deliberations on this stage of the process, the following arrangements are proposed:

1. That one, or possibly two workshops are convened during September to allow Members debate this Report and possible strategic directions.
2. That the said Report, possible strategic directions and next steps are then formally considered at either the Plenary Council meeting of September 2022, or at a Special Plenary Meeting around that time.



**John G. McLaughlin**

**Chief Executive**

**29<sup>th</sup> July, 2022**

## Section 2.0: Consideration of Submissions

This section is the core element of this Chief Executive's Report. Key themes raised during the consultation process are addressed in dedicated 'Themed Responses' in Section 2.1. Thus each subsection summarises the issues identified under each theme and sets out the opinion of the Chief Executive, together with recommendations on the policies to be included in the Draft Plan. Miscellaneous issues are addressed in Section 2.2.



# County Donegal Development Plan 2024-2030

*Your Plan   Your Future   Your Say*

## Themed Response 1: Core Strategy, Housing and Regeneration

Reference numbers of submissions received in relation to Core Strategy and/or Housing		
<b>Submissions from Prescribed Bodies</b>		
DNCC-CN	25	Transport Infrastructure Ireland
DNCC-CN	57	National Transport Authority
DNCC-CN	106	Office of the Planning Regulator
DNCC-CN	107	Northern and Western Regional Assembly
DNCC-CN	118	Údarás na Gaeltachta
<b>Submissions from the Public</b>		
DNCC-CN	4	Cllr. Nicholas Crossan
DNCC-CN	15	Breege Galbraith
DNCC-CN	27	Bundoran Community Development CLG
DNCC-CN	42	Bronagh Heverin
DNCC-CN	59	Ailbhe Ó Monacháin
DNCC-CN	60	Joe Bonner, Town Planning consultant, on behalf of: Patrick McHugh Patrick Boyle Tom Plunkett Paul Murphy John Barrett Frankie Mc Hugh Marc Murphy Packie Mc Kiernan
DNCC-CN	81	John J. Doherty
DNCC-CN	86	Carmel Doherty
DNCC-CN	102	Alan McMenamin
DNCC-CN	117	Conradh na Gaeilge
DNCC-CN	118	Údarás na Gaeltachta
DNCC-CN	120	Bettina Bartmann

### Summary of the global issues raised in the submissions:

The OPR submission notes that the current CDP has not been varied to incorporate the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES), including the realignment of population targets and settlement hierarchy (a point echoed by the Northern and Western Regional Assembly), and advises that this realignment will therefore have to be undertaken in preparing the new CDP. The OPR notes the lack of new housing supply over the past decade and that it will be critical for the Planning Authority to set the right policy context to stimulate housing delivery.

The OPR makes several specific points, summarised as follows:

- Population targets for the county will need to follow the NPF Implementation Roadmap and the RSES.

- Projected population and housing growth of settlements will need to align with the policy objectives of the NPF and the RSES.
- There is a requirement to ensure the alignment of the Core Strategy with the 'Housing Supply Target Methodology for Development Planning Guidelines' (2020).
- The Planning Authority should consider whether there is justification for 'Additional Provision' of zoning in any settlements, as per section 4.4.3 of the Development Plan Guidelines for Planning Authorities; same would need to be justified with reference to the Guidelines.
- The Planning Authority should clearly differentiate between serviced or serviceable land that is zoned to meet housing supply needs.
- A 'Housing Need and Demand Assessment (HNDA)' must be prepared to correlate and accurately align future housing requirements.
- A clear compact growth and regeneration strategy for Letterkenny as a Regional Growth Centre and for settlements larger than 1,500 should be developed to ensure consistency with the NPF.
- The OPR strongly recommends that this Authority includes zoning objectives for all its main settlements in the new CDP, including Letterkenny and the 7 strategic towns.
- The OPR notes from the Issues Paper that a very high proportion of dwelling completions were delivered in rural areas (59%) compared to those delivered in urban settlements (41%). Whilst noting that it is Ministerial policy to accommodate rural housing, the Authority will have to achieve a balance between objectives for compact growth, with the ambitious growth targets for certain settlements, and mandatory objectives for the promotion of sustainable settlement and transport strategies to mitigate climate change.
- The Core Strategy is required to set out the population and housing allocation proposed for the open countryside outside of villages and towns, in addition to those allocated to settlements.
- In support of Regional Policy (RPO 3.3 of the RSES), which seeks to 'deliver at least 20% of all new housing in rural areas on brownfield sites', the new CDP should include practical policy objectives and measures to activate land and facilitate new homes within the footprint of rural settlements (e.g. serviced sites).
- Rural housing policies should be consistent with NPOs 18 and 19 of the NPF (i.e. support the proportionate growth of rural towns, the provision of serviced sites in settlements and distinguish between rural areas under urban influence and rural areas elsewhere).
- The OPR acknowledges that there has been a decline in the Gaeltacht population since the 2011 census. The Authority is advised, through the Core Strategy, to promote development in the Gaeltacht towns and villages through compact growth and regeneration of settlements.
- The need for specialised types of housing, including Traveller accommodation, will be determined through the HNDA. The new CDP must provide implementable objectives for the provision of accommodation for Travellers consistent with estimated need and indicate lands for such accommodation.

The Northern and Western Regional Assembly (NWRA) submission advises that Core Strategy terminology should reflect that of regional policy, with Letterkenny identified as a Regional Growth Centre and the remainder of the settlement hierarchy following thereafter. As regards specific

points relating to Housing and/or the Core Strategy (that are not already referenced above), the NWRA also raises the following:

- The new CDP will be critical in terms of dealing with the significant disruption of MICA defective houses, and the consequential effects which flow from the thousands of houses to be rebuilt.
- The current CDP is configured in a manner that effectively affords 7 settlements similar or equal status. It is suggested that it may be appropriate to revisit this approach in order to bring more effective structure to the County settlement hierarchy and better reflect the comparative growth ambitions of larger settlements such as Ballybofey-Stranorlar and Bunrana.
- The new CDP offers an opportunity to further develop the Metropolitan Area Strategic Plan (MASP) framework for the NW City Region.
- The Letterkenny Regional Growth Centre Plan (as contained in the RSES) includes a defined boundary around the town and this boundary should be replicated in the new CDP.
- The worryingly low level of housing completions in Letterkenny (and indeed the County's main towns generally) is noted and the Assembly advise that any measures to ramp up output would be welcomed.

From a transport perspective, TII notes that the co-ordination of land use planning and transportation is critical to achieving the complementary objectives of compact urban growth whilst safeguarding the strategic function of the national road corridors in County Donegal. TII request that strategic objectives be included in the Core Strategy to reflect the official policy requirements of TII, which are summarised as:

- a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements; and,
- b) to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

TII suggests that the Council may consider it appropriate to review the extent and location of not just residential land when developing the Core Strategy, but also the location of industry, employment and other commercial type land uses, in order to ensure co-ordinated and integrated land use patterns.

Also on the theme of transport as it relates to the Core Strategy, the NTA submission notes that the delivery of housing in line with the Core Strategy, in higher order settlements and guided by the RSES, would complement rather than undermine investment in public transport and active travel infrastructure.

In terms of Gaeltacht areas and the language, Údarás notes that language plans recognise that the activities of the Council (including the planning or development of housing) have a central role to play in the promotion of the Irish language throughout the County. Údarás also notes that housing strategies should respond to the needs of Gaeltacht inhabitants and requests that a robust system be implemented in terms of the language occupancy conditions imposed on housing developments, including an examination of language proficiency. Údarás recommend that consideration be given to the introduction of language conditions not just for developments in the Gaeltacht, but also in

Gaeltacht Service Towns. The submission advises that the effect of housing developments with more than two units must be assessed, in terms of potential impacts on the linguistic and cultural heritage of the Gaeltacht. Údarás advise that Census 2016 showed a severe drop of 15.8% in the number of daily Irish speakers in the Donegal Gaeltacht and note that some of the challenges in this respect relate to the difficulties for young people in finding housing in their native areas; the new CDP therefore needs medium to long-term policies to increase housing supply and to address estimated housing needs in future years and the re-use and regeneration of existing buildings has a part to play in addressing these challenges. Údarás advocates a policy approach whereby the Gaeltacht community has the opportunity to locate in or move back to reside in the Gaeltacht and further advocates an integrated approach, involving Údarás, the Council and other relevant stakeholders, be developed to ensure a viable Gaeltacht community in the years ahead.

The submission from Conradh na Gaeilge echoes the themes raised by Údarás citing, inter alia, the perceived difficulty for native speakers in obtaining planning permission in Gaeltacht areas and the need for appropriate controls on development so as to ensure the preservation of the Irish language.

Outside of the strategic considerations referred to above, a number of other matters related to the Core Strategy/Housing have been raised by members of the public, including:

- The need to zone appropriately located land for housing in Buncrana. Specific comments are raised in relation to certain zoning objectives on lands in the town at present, with the contention that locals are being precluded from building within certain zones. It is suggested that there is a need to release some of the current 'Strategic Residential Reserve' land and further argued that the situation with mica in Inishowen should be factored into housing need projections as there will be a significantly greater need for new housing on foot of this issue.
- The need for more affordable housing in Bundoran, the requirement to tackle ghost estates in the area and the need for regeneration to bring derelict building stock back into use as accommodation.
- The need to reinstate a settlement boundary around Narin/Portnoo, to support the economic and tourism potential of the village.
- The need to reconsider Policy T-P-4 of the current Development Plan and remove restrictions pertaining to access onto the N56.
- The need for suitable housing for elderly people in the Cardonagh area (and indeed generally), close to town facilities, to support independence and better health outcomes for our older generations.
- The need for incentives for the maintenance and restoration of derelict and uninhabited houses, with more onerous planning requirements for houses that are not full-time residences.
- The need for the new CDP to be more ambitious in terms of its intended housing outputs in the Finn Valley area; the need to examine differing types of tenure to make housing affordable; the Council should be negotiating with Government in relation to finance for housing. It is contended that the Council needs to do more to tackle vacancy and dereliction and implement a CPO policy for vacant units in Ballybofey and further afield. It is contended that Ballybofey-Stranorlar needs more housing and that the reliance on the private sector

and Approved Housing Bodies has not worked, whilst private market availability to rent is almost non-existent. Land should be acquired around/near each town for strategic housing builds. Planning for private developments can be managed on a phased approach to lessen the potential for unfinished estates.

- The need for serviced sites for people to build their own homes in smaller towns, and appropriate house types and tenures to cater for all needs.

### **Opinion of the Chief Executive in relation to the issues raised regarding the Core Strategy and housing policy:**

The comments of the OPR and NWRA in respect of the need to align the Core Strategy of the new Development Plan with the NPF and RSES are noted and shall be addressed in the review of the Plan. The recently published 'Development Plan Guidelines for Planning Authorities' (July 2022) advise that a primary focus of the Development Plan is to ensure that the plan has been informed by the relevant plans and strategies of the Government and statutory public agencies, but has also been influenced by an understanding and analysis of the local context of the area for which it has been prepared. In preparing the new CDP 2024-2030 therefore, the Council will adhere to the principles set out in the Guidelines whilst also being appreciative of local circumstances, and in accordance with Section 10(1A) of the Planning and Development Act 2000 (as amended), will set development objectives in the CDP that "are consistent, as far as practicable, with national and regional development objectives set out in the NPF and the RSES and with specific planning policy requirements specified in guidelines under subsection (1) of Section 28".

When proposing the zoning of land (inclusive of any required 'Additional Provision') or indeed when considering settlement boundaries, the Planning Authority should have due regard to, inter alia, the availability of services for that land. The need for different housing types (including specialist housing) and tenures will be established via, inter alia, the preparation of a detailed Housing Need and Demand Assessment (HNDA), and robust implementation and monitoring measures should be firmly embedded in the finalised plan. As regards commentary in relation to the potential for the provision of 'serviced sites' in towns and villages, it is agreed that such an approach could usefully contribute towards housing supply in the County, and National Policy Objective 18b of the NPF is noted in this regard, as it seeks to 'Develop a programme for new homes in small towns and villages' with Local Authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages'. It is worth noting that the current CDP contains an objective to examine opportunities for the delivery of serviced sites.

Regarding the need for regeneration of our towns and villages, it is acknowledged that this is a key issue in terms of the future sustainable development of the County. In preparing the new CDP, the Planning Authority should focus on the sequential development of settlements and seek to identify opportunities for town centre renewal to bring derelict, redundant and/or under-utilised land, sites and buildings back into active use, and to address housing need. In this regard, the forthcoming Residential Zoned Land Tax should also aid with the activation of zoned and serviced lands for the purpose of delivering housing supply and ensuring the regeneration of vacant and idle lands in urban locations.

Submissions in relation to the mica issue are noted, and the huge challenges posed as a result of the use of defective concrete blocks, and indeed the stresses placed on householders as a result of this issue, are fully recognised. In drafting the new CDP, the Authority should be cognisant of the need to support all relevant initiatives that are devised to address this issue and should endeavour to bring forward planning policies and land use zonings, as appropriate, that can contribute towards the satisfactory resolution of this significant problem.

With regard to the settlement hierarchy in the County, this issue will be closely examined when devising the Core Strategy for the new CDP and, in accordance with the 'Development Plan Guidelines for Planning Authorities', should focus on compact growth and the proportionate development of settlements based on the availability and activation of serviced land. Specific comments/submissions in relation to zoning and housing requirements for Ballybofey-Stranorlar, Buncrana and Bundoran are noted, and whilst the Core Strategy of the CDP will include details of the physical area to be zoned for housing purposes in these towns, it should be noted that the new CDP 2024-2030 will also include specific Local Area Plans for Ballybofey-Stranorlar (with a focus on potential economic opportunities arising as a result of the planned TEN-T scheme), Buncrana and Bundoran; thus the detailed zoning and policy considerations for these towns will be included therein.

Regarding the NWRA comments on the Metropolitan Area Strategic Plan (MASP) framework for the NW City Region, it is acknowledged that the new CDP offers an opportunity to further develop this concept. As requested by the NWRA, the Letterkenny Regional Growth Centre Plan boundary (as contained in the RSES) will be reflected in the new CDP.

From a transport perspective, TII's contentions that the co-ordination of land use planning and transportation is critical are agreed. The settlement hierarchy (and zonings therein) will have due regard to the availability of transport infrastructure. As regards the specific Core Strategy objectives requested by TII (e.g. to maintain the strategic function, capacity and safety of the national roads network), it is agreed that such objectives would be appropriately included in the CDP but would be better placed within the Transportation section rather than the Core Strategy. Other detailed matters, such as the issue of access onto the National Road Network, are the subject of ongoing discussions between the Council and TII, and the policy framework of the new CDP will be informed by the outcome of these interactions.

In terms of development within Gaeltacht areas, the mandatory requirement for Development Plans, as set out under Section 10(2)(m) of the Act, which provides that objectives must be included to secure "the protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language....." is noted. To this end, the new CDP should be drafted to ensure that planning policies in Gaeltacht areas prioritise the protection of the language whilst also providing for the needs of community, in land-use terms, for housing, jobs, recreational and community facilities. In terms of new holiday home development in rural areas, the current CDP adopts an approach whereby the focus is on satisfying the opportunity for holiday homes only through the use/re-use of the existing housing stock or via the refurbishment of derelict buildings. Given the level of vacant housing stock in the County, it is considered that the continuation of this approach is likely to be the most appropriate course of action going forward. It is worth noting at this juncture that the 'Development Plan Guidelines for Planning Authorities' advise that



Governmental guidelines for planning matters in Gaeltacht areas are due to be drafted in due course, to give further detail on specific matters related to the Irish language in the planning system; full regard will be given to such guidelines when available.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the Core Strategy and Housing policies to be included in the Plan be guided as follows:**

- In accordance with the provisions of Section 10(1A) of the Planning and Development Act 2000 (as amended), the new CDP must include a Core Strategy which “shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy and with specific planning policy requirements specified in guidelines under subsection (1) of Section 28.” Key documents to be considered in this regard include Town Centre First, Housing For All and Our Rural Future.
- The Core Strategy shall include a settlement hierarchy for the County, effectively setting out a vision for growth and providing for the proportionate development of settlements.
- The Core Strategy shall include a comprehensive analysis of existing and proposed land-use zonings throughout the County, with a particular focus on residential development.
- The Core Strategy shall set out a clear housing supply target for the Development Plan period, consistent with the methodology prescribed in the Government’s Housing Supply Target Methodology Guidelines.
- An estimate of the type and tenure of housing required (inclusive of specialist housing) shall be informed through, inter alia, the preparation of a detailed Housing Need and Demand Assessment.
- Urban and rural housing policy (inclusive of housing policy for rural Gaeltacht areas) shall be informed by relevant Government guidance and best practice. With particular regard to rural areas, there is a need to support vibrant rural communities whilst at the same time protecting the natural assets of the County and supporting the viability of our rural towns and villages. An appropriate balance between these considerations will need to be achieved.

<b>List of submissions on the theme of Urban Regeneration</b>		
<b>Submissions from Prescribed Bodies:</b>		
DNCC-CN	104	The Arts Council
DNCC-CN	106	The Office of the Planning Regulator (OPR),
DNCC-CN	107	North West Regional Assembly (NWRA).
<b>Submissions From the Public:</b>		
DNCC-CN	4	Nicholas Crossan
DNCC-CN	8	Eithne O Sullivan
DNCC-CN	10	Val O Kelly
DNCC-CN	12	Dara Furey
DNCC-CN	15	Breege Galbraith
DNCC-CN	27	Bundoran Community Development CLG
DNCC-CN	56	Ian Davies
DNCC-CN	58	Letterkenny Glass
DNCC-CN	60	Patrick McHugh
DNCC-CN	70	Gravis Planning
DNCC-CN	80	Fermanagh & Omagh District Council
DNCC-CN	82	Brian Flanagan
DNCC-CN	90	Discover Bundoran
DNCC-CN	100	Sile Ui Ghallachoir
DNCC-CN	102	Alan Mc Menimin
DNCC-CN	103	Killybegs Marine Cluster
DNCC-CN	104	The Arts Council
DNCC-CN	106	Office of the Planning Regulator
DNCC-CN	107	North West Regional Assembly.

**Summary of the main global issues arising in the submissions and under the theme of 'Urban regeneration':**

Several submissions reference the evidenced need for a focus on compact growth, appropriate zoning and tackling the blight of vacant and derelict properties as key drivers for the regeneration of our settlements. These issues are addressed in the previous sub-section on Core Strategy and Housing.

The submissions identify specific key sectors and industries that could make a difference to the county in regenerating urban economies. These include: improvements in regional connectivity through strategic roads projects; investment in ports and harbours building on and developing the successful regeneration project ongoing in Killybegs and Burtonport; investment in Greencastle could make a positive contribution to utilising the economic potential from the cruise ship tourism industry.

**Opinion of the Chief Executive in relation to the issues raised regarding the theme of 'Urban Regeneration' including infrastructure.**

The importance of pursuing a strong regeneration agenda is now firmly established in the County arising from the success of the Regeneration Unit in securing over €20m funding for a number of settlements across the County. The successful funding applications were grounded in many cases in strong supportive statutory planning policy in the CDP and/or Local Area Plans and it is considered that a similar strategy must be included in the new CDP. Such a strategy is likely to include considerations such as:

- Clear identification of specific and individual sites/locations within towns and villages to target focused urban regeneration.
- Assessing Infrastructural capacity
- Potential renewal/ regeneration/land assembly projects in line with funding opportunities.
- Focused objectives to achieve regeneration and renewal through addressing vacancy and dereliction in accordance with Section 10(2)(h) of the Act.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the policies to be included in the Plan relating to the Regeneration of Towns & Villages (including Infrastructure) be guided as follows:**

1. To advocate a coordinated and cross sectoral approach to addressing the challenges to the regeneration of our towns and villages.
2. To examine the characteristics of towns and villages within Tiers 3 & 4 that have potential for economic, social and community regeneration, building on the successes already achieved in the higher order settlements with a view to not only pursuing public sector funding but also stimulating private sector investment.
3. 'Calling out' vacancy and dereliction where it is a significant issue in our settlement centres, and identify appropriate mechanisms to address these problems.

## Themed Response 2: Tourism

### Reference numbers of submissions received in relation to Tourism

Submissions from Prescribed Bodies		
DNCC-CN	78	Fáilte Ireland
DNCC-CN	80	Fermanagh and Omagh District Council
DNCC-CN	107	North West Regional Assembly
DNCC-CN	118	Údarás Na Gaeltachta
Submissions from the Public		
DNCC-CN	24	St John's Point Resident's Association
DNCC-CN	33	Sinead Egan
DNCC-CN	34	Comharchumann na nOileán Beag
DNCC-CN	68	Lár Chomhairle Paroiste
DNCC-CN	70	Gravis Planning
DNCC-CN	71	Northern View Leisure Limited
DNCC-CN	72	Northern View Leisure Limited
DNCC-CN	85	Ronald Ferguson
DNCC-CN	90	Discover Bundoran
DNCC-CN	93	Scott Duncann Dean Newton
DNCC-CN	99	Joseph Brennan
DNCC-CN	112	Enya Alvey
DNCC-CN	120	Bettina Bartmann

### Summary of the global issues raised in the submissions and during the consultations:

The Fáilte Ireland submission highlights the importance of tourism to Donegal and specifically recommends that the plan should, inter alia:

- Have a dedicated Tourism chapter and should cover a wide range of tourism topics including, inter alia, the Wild Atlantic Way (WAW), Activity and Adventure tourism, Greenways and Blueways, etc.
- Include objectives to support the preparation and implementation of Regional Tourism Strategies currently in preparation and Destination Experience Development Plans.
- Include an objective to collaborate with Fáilte Ireland to ensure maintenance of Discovery Point routes and visitor facilities at key locations and support the development of additional visitor experience for the Wild Atlantic Way.
- Include an objective protecting the integrity of key tourism amenities from negative impacts.
- Reference specific capital investments including Dunree Fort and Dunree Head Buncrana, Tullan Strand Centre for Water Sport Activities, and Downings Water Sports Activity Facility.
- Support the Ireland Outdoor Dining Enhancement Scheme.
- Support the implementation of Visitors Experience and Management at Glenveagh National Park.
- Support quality and diverse accommodation offerings.
- Support the growth of facilities for campervans and 'Aires' in sustainable locations.

- Provide for supporting infrastructure such as visitor car parking, toilets, cafés, and catering facilities in sensitive locations,
- Protect and enhances the tourism resource.
- Facilitate the provision of Electric Charge Points on the WAW and the development of the WAW coastal path.
- Support the development of accessible facilities, infrastructure and transport.
- Facilitate the improvement of marine and harbour infrastructure in support of coastal cruising and water activities.

Several public submissions generally highlighted the need to preserve the landscape resource which has made Donegal a popular tourism destination, and in particular the scenic importance of St John's Point was highlighted in several submissions.

In general, a number of public submission highlighted the need for the improvement of tourism infrastructure around the county including: the need for improved visitors facilities at Sliabh Liag, the provision of Greenways (e.g. Erne Atlantic Greenway, and between Carrick and Teelin), the provision of marine tourism infrastructure (e.g. pontoon facilities at Bunrana, facilities to service the Cruise Ship market in Killybegs) and the need to improve facilities at the Fintown Railway.

In relation to mobile homes, the importance of the mobile home tourism accommodation in Bundoran was highlighted and there was a specific request to remove the current prohibition on the extension of new mobile home parks in areas of Especially High Scenic Amenity (TOU-P-19 and TOU-P-19 refers).

In addition, in relation to the online survey:

- The responses to *Question 6: What types of economic development it is important for the development plan to support?* tourism was the most selected response with 114 responses in total.
- The responses to *question 17: What forms of tourism development should the plan facilitate?* indicated a strong preference for Walking and Cycling (133), family group-based activities (112) and marine tourism (96) developments.
- The responses to *Question 18: What types of tourism accommodation should the plan facilitate?* favoured: self-catering (99), campervan/motorhome sites (95), and camping and camping and caravan sites (88), whilst holiday homes (24) and mobile home parks (41) were the least favoured type of accommodation.

### **Opinion of the Chief Executive in relation to the issues raised**

The vital contribution of tourism to Donegal's economy and society is demonstrated by the fact that 13% of employment in the County is dependent on tourism (EY, Oxford Economics 2020: Potential Impact of Covid-19 on Irish Tourism). This is clearly reflected in the pre-draft public submissions and survey responses. The importance of the tourism resource has been recognized by the Council through the ongoing work of Donegal Tourism Ltd, the Local Economic, Community Plan 2016-2022

and Caravan, Camping, Campervan and Motorhome Facilities Grant Scheme 2022, and through the implementation of the existing tourism policies and objectives within the existing CDP.

It is considered that the Wild Atlantic Way touring route represents a valuable tourism asset, forms an integral part of the wider Donegal brand, has been pivotal in increasing visitor numbers and possesses significant growth potential. In addition, Donegal's wider landscape remains a key tourism attraction. In this regard it is considered that the tourism strategy, policies and objectives of the new CDP can be broadly aligned with the objectives of Failte Ireland subject to detailed considerations.

Several submissions highlight greenway and blueway opportunities. The experience of other regions clearly demonstrates that outdoor recreation has significant tourism potential (e.g. the Great Western Greenway, the Waterford Greenway). The Council is currently preparing an Outdoor Recreational Strategy which will provide a roadmap for informing the sustainable development and management of outdoor recreation over the next 5 years. In turn it is considered that the development plan should: recognize, appreciate, and prioritize outdoor recreational amenity as a critical part of Donegal's tourism offering, support the implementation of the Donegal Outdoor Recreational Strategy and facilitate greenway projects as they develop.

In relation to marine tourism submissions, it is considered that the plan should actively support improved marine leisure and access infrastructure both at key coastal locations, and on Donegal's islands to unlock the County's considerable marine tourism potential. The proposal for a cruise ship berth facility in tandem with the provision of improved harbour facilities at Greencastle would bring significant cross border benefits and should be actively supported by the Plan. In addition, the Buncrana Local Area Plan should support in the principle the provision of additional marine leisure facilities in Buncrana Harbour.

The importance of enhanced of Campervan, Caravan and Camping (CCC) facilities is recognized in policies TOU-P-11 and TOU-P-19 of the current development plan and the Council's recent Caravan, Camping and Camper Van Study (KPMG October 2021) makes key recommendations including: a blended model of both traditional overnight model and transient facilities, community/business based CCC facilities in underserved areas, providing transient campervan facilities in towns and villages, generally restricting new campsites to within walking distance of town or villages, and incorporating conditions for transient facilities for campervans into existing tourist facilities. It is considered that these recommendations should inform the approach taken in the objectives and policies for the CCC sector in the new development plan.

With regard to the submissions on mobile home parks it is considered that the approach to new and existing mobile home parks in the new CDP should be consistent with the strategic need to support the brand identity of the Wild Atlantic Way, protect the fundamental landscape resource underpinning Donegal's tourism offering and maximise the economic benefits arising from tourism development. In this regard the policy approach in the existing CDP which facilitates new mobile home parks within settlements and otherwise facilitates the extension of existing mobile home parks in urban and rural areas outside of areas of Especially High Scenic amenity is consistent with said approach and should be retained.

In relation to the specific submission on Bundoran please refer to Themed Response 11.

With regard to tourism and the Gaeltacht, please refer to Themed Response 10: 'Community, Culture and the Gaeltacht'.

**Recommendation of the Chief Executive on the policies to be included in the Draft Development Plan**

Based on the above it is recommended that the new CDP should include a dedicated Tourism section with policies and objectives which are guided by the need to:

- a) Protect the fundamental landscape, seascape, cultural and built heritage resource underpinning the Wild Atlantic Way and Donegal tourism brands.
- b) Protect and facilitate the sustainable development of key 'must see' signature tourism attractions (including improved visitor facilities and experiences) at existing strategic attractions and provide for specific new strategic tourism attractions and projects.
- c) Facilitate the development of experience based/resource related and cultural tourism attractions throughout the County which gives visitors lots of things to 'see and do', and align with the brand identity of the Wild Atlantic Way, and recognize, appreciate and prioritize outdoor recreational amenity as critical part of Donegal's tourism offering and facilitate existing greenway projects currently under development.
- d) Support the provision of a range of ancillary tourism infrastructure and visitor facilities at key locations to support the overall tourism experience.
- e) Facilitate quality tourism accommodation at appropriate locations consistent with core sustainable development principles, and supporting the brand identity of the WAW, the wider Donegal tourism brand and the need to protect the fundamental landscape attractions of the County.
- f) Support Gaeltacht and Islands tourism including supporting specific Gaeltacht tourism projects, new and enhanced green, blue and marine access infrastructure, improved visitor facilities at Gaeltacht beaches and the prioritization of signage in the Irish language.
- g) Encourage accessible tourism projects and otherwise ensure that accessibility is integrated into new tourism proposals through appropriate design wherever possible.

### Themed Response 3: Water & Wastewater

A total of 8 submission received made reference in some way to the themed response of Water and Wastewater infrastructure.

<b>Water and Wastewater:</b>		
<b>Submissions from Prescribed Bodies:</b>		
DNCC-CN	46	Irish Water
DNCC-CN	51	Local Authority Waters Programme
DNCC-CN	80	Fermanagh and Omagh District Council
DNCC-CN	106	The Office of the Planning Regulator (OPR),
DNCC-CN	107	North West Regional Assembly (NWRA).
<b>Submissions from the Public:</b>		
DNCC-CN	14	Mark Grant
DNCC-CN	27	Bundoran Community Development CLG.
DNCC-CN	40	Inishowen Rivers Trust

#### **Water & Waste-Water Infrastructure**

##### Irish Water

The Irish Water (IW) submission firstly sets the work of IW in the context of a number of high-level strategy and policy documents including:

- ~ the Water Services Policy Statement, 2018-2025 (DHPLG, 2018);
- ~ the Water Services Strategic Plan, 2015 (IW);
- ~ the Strategic Funding Plan 2019-2024 (IW); and the
- ~ the Capital Investment Plan, 2020-2024 (IW).

In the latter document a link to an Investment Plan Explanatory Booklet (July, 2021) is included. That document includes proposed County-by-County project investments although cautioning that 'this is being refined and is subject to budgetary, technical and environmental constraints, as well as statutory approvals. Subject to these provisos, the relevant table for Donegal is included below:



County	LA	Project Name	Project Type	Status as at July 2021
Donegal	Donegal	Ballybofey/Stranorlar Sewerage Scheme - Wastewater Treatment Plant and Network	Wastewater Project	Complete
	Donegal	Ballyshannon Regional Water Supply Scheme (Phase 1) - Water Treatment Plant and Network	Water Project	Complete
	Donegal	Buncrana Wastewater Network	Wastewater Project	Design
	Donegal	Buncrana Wastewater Treatment Plant	Wastewater Project	Design
	Donegal	Burtonport Wastewater Treatment Plant	Wastewater Project	Design
	Donegal	Camigart Wastewater Treatment Plant	Wastewater Project	Design
	Donegal	Coolatee Wastewater Treatment Plant	Wastewater Project	Design
	Donegal	Donegal Countywide Watermain Rehabilitation	Water Project	Complete
	Donegal	Falcaragh Wastewater Treatment Plant	Wastewater Project	Design
	Donegal	Kerrykeel Wastewater Treatment Plant	Wastewater Project	Construction
	Donegal	Kilcar Wastewater Treatment Plant	Wastewater Project	Construction
	Donegal	Killybegs Regional Water Supply Scheme	Water Project	Design
	Donegal	Letterkenny Regional Water Supply Scheme	Water Project	Construction
	Donegal	Letterkenny Sewerage Scheme - Joe Bonnar Road	Wastewater Project	Complete
	Donegal	Letterkenny Sewerage Scheme - Network	Wastewater Project	Complete
	Donegal	Lettemacaward Regional Water Supply Scheme	Water Project	Design
	Donegal	Milford Wastewater Network	Wastewater Project	Design
	Donegal	Milford, Ramelton and Rathmullan Wastewater Treatment Plant	Wastewater Project	Design
Donegal	Donegal	Moville Wastewater Treatment Plant	Wastewater Project	Design

The IW submission then sets IW's work in the context of Climate Change and notes that Irish Water is focused on addressing the impacts of climate change 'by adapting our assets to be resilient to climate change and mitigating our climate impact by reducing our carbon footprint', and that IW is 'preparing a strategy which will respond to global and national climate change legislative and policy frameworks for climate change action.'

The IW submission then focuses on three strategic environmental considerations influencing their water services work:

~ The National Water Resources Plan (NWRP) outlines how IW intends to move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. Consultation on the North West regional plan, which includes County Donegal, will commence in 2022.

~ Drinking Water Source Protection: IW has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap.

~ River Basin Management Plan: IW supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework

Directive initial and further characterisation activities. The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into IW investment plans and work programmes as appropriate, and the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

With regard to zoning the IW submission advises that: Irish Water are available to assist in the process of identifying suitable zoned lands from a water services perspective, and that sequential development in areas with existing water services infrastructure and spare capacity is encouraged. They then note a range of technical issues to be considered.

#### Water and Wastewater Capacity Summaries

IW makes the following general observations:

##### **Wastewater Treatment Plants:**

It is envisaged that there is adequate capacity to cater for the 2031 transitional target population of 26,000 in the Regional Growth Centre of Letterkenny.

There are a significant number of WWTP projects ongoing in County Donegal which include provision for growth, these include:

- Projects in Carrigans, Lifford and Killea at construction stage.
- WWTP upgrade projects at Bunrana, Milford, Ballintra, Carrigart, Kilmacrennan and Pettigo at detailed design stage.
- Design scheduled to commence for WWTP projects in Ballyliffin, Dunfanaghy/Portnablagh, Fahan, Muff and Raphoe later this year.
- Projects are ongoing to provide WWTPs in the previously untreated agglomerations of Merville, Ramelton, Falcarragh, Rathmullan, Kilcar, Coolatee, Burtonport and Kerrykeel.
- Minor WWTP upgrades and improvements are also continually carried out on a nationally prioritised basis through Irish Water's programmes.
- A project to cease discharge in Mountcharles, transferring flows to the Donegal Town network is being progressed via Irish Water's Small Towns and Villages Growth Programme.

##### **Wastewater Networks:**

Letterkenny - A Network Development Plan was recently carried out and will help inform how undeveloped zoned sites within the town could be serviced. With the recent completion of the Letterkenny sewerage scheme which has addressed capacity and flooding constraints, the built-up area of Letterkenny is generally well served.

Bundoran - Works recently completed addressed network capacity and compliance issues.

Lifford - A network upgrade project in Lifford is at construction stage.

Bunrana and Ballybofey-Stranorlar – Network upgrade projects at tender stage. Several of the Ongoing projects to provide WWTPs in untreated agglomerations – several will include some network upgrades however, these are generally limited to the existing network.

Donegal Town - Issues at the New Pier pumping station are being assessed.

An Bun Beg-Doirí Beaga - IW working to deliver an innovative project to provide a sewerage collection and treatment facility for this area. An initial demonstration project involving 20-30

houses is currently being commissioned. Following completion of the demonstration project, there will be a 12-month information gathering stage which will inform detailed design and how the wider scheme will be progressed

#### **Water Supply:**

IW recently issued a water supply capacity register which provides an indication of available capacity in settlements in Donegal that are served by Irish Water. The regional water resources plan for the North West is currently being prepared and will identify plan-level approaches to address the identified needs in Donegal in a sustainable

Letterkenny - several significant projects undertaken in recent years to increase and secure the water supply to the town and a project also recently commenced to progress minor improvements at Illies Water Treatment Plant. Envisaged that with these projects, as well as targeted leakage reduction activities, will provide sufficient water supply to accommodate the projected growth over the Development Plan period 2024-2030. IW are also planning a project to further augment supply from the Illies WTP to Letterkenny to provide for growth in the medium-long-term, including the provision of strategic storage and network upgrades.

Works are ongoing at a number of other supplies across the county to improve the Level of Service provided e.g. upgrade works at Owenteskna Water Supply Scheme, Crolly WTP, Lough Mourne, Milford, Fanad and Culdaff WTPs. Works to supplement supply at Pettigo, Lough Mourne, Ballyshannon, Ballymacool and Carndonagh are being progressed via IW's Groundwater Programme.

#### **Water Networks:**

General - IW and DCC continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. IW and DCC will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Extensive mains rehabilitation works have been carried out in recent years on distribution and trunk mains throughout the county, and an additional 12km of pipeline has been approved for delivery this year.

Letterkenny - A project to construct a new trunk main to interconnect Letterkenny with Illies WTP was recently completed. A Network Development Plan is scheduled to be carried out for Letterkenny which will help inform how undeveloped zoned sites within the town could be serviced.

Menu of appropriate Objectives/Policies for Water Services in Development Plans: The submission from IW concludes by attaching this document that identifies a range of policies and objectives for inclusion the Draft Plan.

#### **Local Authority Waters Programme (LAWPRO)**

The LAWPRO submission advises that the protection and restoration of our natural waters is addressed through the National River basin Management Plan for Ireland (2022-2027) as required under the EU Water Framework Directive, and that the CDP should reference this document and incorporate relevant elements into the CDP's policies and Objectives. Such elements should include land Use planning, the governance of extractive industries (quarries), drinking water, urban wastewater, urban runoff, domestic wastewater and regulation of drainage. The submission notes

National Policy Objective 57 of the NPF, which seeks to ensure that the River Basin Management Plan (RBMP) objectives are fully considered throughout the physical planning process.

Finally, the LAWPRO submission stresses the importance of High Status Waterbodies and it is important that planning authorities plan for their protection and are aware of the locations of, and objectives for, such waterbodies under the River Basin Management Plan.

#### Fermanagh and Omagh District Council (FODC)

FODC recognises the challenges facing DCC in relation to a lack of spare wastewater treatment capacity in smaller towns. FODC requests that both authorities explore a more joined-up approach between the two Councils in relation to wastewater systems.

#### Office of the Planning Regulator (OPR)

Notes that 'there is sufficient capacity to support sufficient growth of the main towns over the period of the new development Plan, which is a material consideration for the planning authority in devising the core strategy. Encourages the Planning Authority to work proactively with Irish Water to progress projects that deliver infrastructure for the county's smaller settlements through Irish Water's Small Towns and Villages Growth scheme.

#### Other Issues Raised

The remaining submissions contained comments: expressing concerns re the sewage system in Ballyliffin; concerns that certain winds and tides still bring sewage to the West End Pool and Pier in Bundoran; and a detailed submission from the Inishowen Rivers Trust identifying various environmental concerns and considerations for the Draft Plan around the issues of water quality, wastewater treatment and the impact of development on aquatic habitats.

#### **Opinion of the Chief Executive in relation to the issues raised regarding Water and Wastewater:**

The desired growth of our County in an environmentally-sensitive and sustainable manner is heavily contingent on being supported by adequate water and wastewater infrastructure. IW's submission identifies a large body of recent and future investments in the water and wastewater infrastructure of the County and this is to be welcomed. However, significant deficits remain (as referenced in some of the other submissions), and these present significant challenges for the Authority in formulating a core strategy to drive the aforementioned desired growth in an appropriate manner consistent with the national and regional compact growth agenda. The international and national focus on the need to protect water supply sources both in terms of the water supply and biodiversity agendas is entirely appropriate but again adds to the challenges facing the Authority. Preparatory work on the Plan undertaken to-date has given a particular focus to the water and wastewater capacities of our settlements and this work will be presented to Members during the next round of MD workshops on the Plan.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the Water & Waste-water policies to be included in the Plan be guided as follows:**

By working strategically with Irish Water and other key stakeholders to ensure the alignment of the IW Capital Investment Plans with National, Regional and Local planning policy to deliver resolutions to key future infrastructure investment needs, thereby ensuring the future strategic and sustainable development of towns and villages within the County.

By promoting the development or redevelopment of sites already serviced by, or adjacent to, existing infrastructure to maximise the benefit from existing investment in water services, to foster compact growth and to breathe new life into our town and village centres in keeping with the principles of the circular economy.

By ensuring that the Plan protects existing water supply sources in terms of both the practical benefits of providing a water supply and also their inherent biodiversity qualities.

## Themed Response 4: Renewable Energy

### List of submissions received in relation to Renewable Energy

Submissions from Prescribed Bodies:		
DNCC-CN	39	ESB
DNCC-CN	89	Department of Environment, Climate and Communications
DNCC-CN	106	The Office of the Planning Regulator (OPR)
DNCC-CN	107	North West Regional Assembly (NWRA)
DNCC-CN	123	Department of Agriculture and Rural Affairs (NI)
Submissions from the Public:		
DNCC-CN	24	St. John's Point Residents' Association
DNCC-CN	26	Brendan Carroll
DNCC-CN	28	Ivernia Energy Ltd. c/o O'Neill Town Planning
DNCC-CN	37	Gas Networks Ltd.
DNCC-CN	63	Barbara Bradby
DNCC-CN	68	Lár Chomhairle Paróiste Ghleann Cholm Cille
DNCC-CN	92	Gweebarra Conservation Group
DNCC-CN	93	Dean Newton/Scott Duncan
DNCC-CN	94	Agnes Dolan
DNCC-CN	95	Mulmosog Wind Ltd. c/o Harley Newman Planning Consultants
DNCC-CN	96	Gineadoir Gaoithe Teoranta c/o Harley Newman Planning Consultants
DNCC-CN	97	Wind Energy Ireland
DNCC-CN	100	Sile Uí Ghallhóir
DNCC-CN	101	Canavan Associates
DNCC-CN	105	Planree Energy Ltd., c/o MKO
DNCC-CN	108	Cloghercor Windfarm Ltd.
DNCC-CN	109	Joseph Brennan
DNCC-CN	110	FuturEnergy Ireland
DNCC-CN	111	Eirgrid
DNCC-CN	112	Enya Alvey
DNCC-CN	113	Noreen Trearty
DNCC-CN	114	Hugo Trearty
DNCC-CN	115	Eugene Trearty
DNCC-CN	120	Bettina Bartmann
DNCC-CN	121	Alun Evans

### Summary of the global issues raised in the submissions

Reference was made to a range of renewable energy sources including terrestrial wind, off-shore wind, solar and biomethane and hydrogen production. Also highlighted were security of supply, compliance with government targets including those set out in the Climate Action Plan as well as potential effects on ecology and local communities.

The Department of Agriculture, Food and the Marine references the construction of offshore windfarms stating that, in the event that offshore renewable energy installations (including offshore windfarms, tidal, and wave generators) are proposed, the evaluation and consideration of potential impacts on any commercial sea-fishing activities needs to be given consideration and suggest consultation with stakeholders at the earliest opportunity.

TII indicates support of the Government's objective to transition to a zero carbon economy. However, TII highlights that grid connections accommodated on national roads have the potential to result in safety issues due to, inter alia, differential settling of the ground, and recommend that grid connection proposals should be developed which safeguard the strategic function of the national road network by utilising available alternatives in the first instance (i.e. consider alternatives to laying grid connections along national roads), and would welcome this matter being considered as a policy provision in the Draft Development Plan

The TII submission sets out the following recommendations:

- TII would welcome the inclusion of an objective in the new CDP in relation to renewable energy and in relation to safeguarding the national road network to provide that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternative routes in the first instance.
- Applications for Photovoltaic (Solar) Farm developments (PV developments) should be accompanied by glint and glare assessments and such a requirement should be included as a provision of the Plan.

The ESB submission refers to the Climate Action Plan and its requirement to have 80% of Ireland's electricity from renewable sources comprising a mix of 5GW off-shore, 8GW on-shore and 1.5-2.5GW solar PV. It refers specifically to the Draft National Marine Planning Framework's new spatial system for designation of marine zones for off-shore renewables, including wave, tidal and floating wind, indicating their support of objectives for wave and tidal energy. ESB also notes that solar projects will play a critical role in diversifying the Country's renewable energy portfolio.

ESB stresses the importance of providing energy security for the country during the transition to an all-green and renewables electricity sector by providing for adequate supporting energy infrastructure using the cleanest natural gas technologies aiding the integration of renewables in the shift to a sustainable energy system. The ESB recommends that the Council supports hybrid connections (co-location of two or more renewable energy sources) as this can expedite the connection of offshore wind, and suggests an objective be included in the Plan, along with the following suggested wording that has been adopted by other local authorities. "Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment."

Inland Fisheries Ireland emphasises the importance of ecology stating that wind energy developments must recognise the protection of water quality, and habitat protection and also consider the maintenance and restoration of identified high quality water sites.

Other points/suggestions made in the submissions include the following

- Support for off-shore wind development.
- Need for alignment with the Government's renewable energy targets and the Climate Action Plan.
- Need for recognition of the positive contribution renewable energy can make to the economy.
- Consider supporting development (incl. infrastructure) necessary to support the development of renewable energy.
- Potential impact on visual amenity from wind energy development
- Adverse health impacts from windfarms due to generation of infrasound.

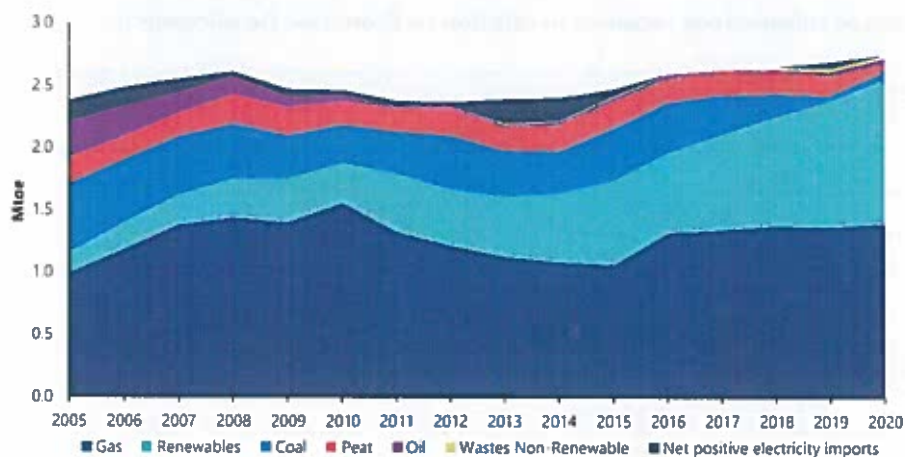
Similar to the recent public consultation on the CDP 2018-2024 Variation In Respect Of A Wind Energy Policy Framework, there were contrasting submissions made with the industry noting the national climate change and renewable energy targets agenda and the associated national planning policy and guidelines on the one hand, and other submissions expressing opposition to such development, particularly impacts such developments have on residential receptors.

#### **Opinion of the Chief Executive in relation to the issues raised regarding Renewable Energy**

The need to strike the appropriate balance between contributing to the national renewable energy objectives and targets whilst preserving the amenities of the County was considered in detail during the recent preparation and making of the Variation of the existing CDP In Respect Of A Wind Energy Policy Framework. These issues will have to be considered again during deliberations on the broader suite of potential renewable energy sources/policies to be contained in the new Plan. To that end, Members are reminded that the current CDP policies provide broad support for a range of renewable energy sources including terrestrial wind, off-shore wind, solar PV, and biomethane and hydrogen production. The current approach is broadly aligned with the national policy agenda in respect of tackling climate change. The figure below is extracted from the most recent SEAI 'Energy in Ireland Report, 2021' and illustrates an increase in renewable energy generated and a decrease in fossil fuel generated energy.



**Figure 23: Electricity generated by fuel type**



Source: SEM

Recent international, European and national legislative requirements set out a framework for an advancement of the trajectory illustrated in the figure above through the harnessing of renewable energies, and the necessity of the alignment of renewable energy objectives and policies at a county level with this hierarchy must again be acknowledged. At the same time a balance must be achieved including sufficient consideration being given to impacts of such developments on the environment and residents of the County.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the Renewable Energy policies to be included in the Plan be guided as follows:**

1. Alignment with international, European and national renewable energy targets, inclusive of carbon emission targets contained in the Climate Action Plan; and alignment with national planning policy/guidelines.
2. Inclusion of a framework to allow consideration of a range of renewable energies including terrestrial wind, off-shore wind, solar PV, and biomethane and hydrogen production.
3. Consideration of potential interaction with, and effects on, the built and natural environment and residential receptors.
4. Consideration of security of supply.
5. Safeguarding the national road network and other infrastructure necessary to support the development of renewable energy.

## Themed Response 5: Economic Development

### Reference numbers of submissions received in relation to Economic Development

Submissions from Prescribed Bodies		
DNCC-CN	25	Transport Infrastructure Ireland
DNCC-CN	39	ESB
DNCC-CN	80	Fermanagh and Omagh District Council
DNCC-CN	106	OPR
DNCC-CN	107	Northern and Western Regional Assembly
DNCC-CN	118	Údarás na Gaeltachta
Submissions from the Public		
DNCC-CN	9	Ronald Ferguson
DNCC-CN	42	Brónagh Heverin
DNCC-CN	56	Ian Davis
DNCC-CN	58	Joe Bonner Town Planning Consultant on behalf of Letterkenny Glass – JMP Partnership
DNCC-CN	68	Lár Chomhairle Paroiste
DNCC-CN	70	Gravis Planning
DNCC-CN	77	Killybegs Fisherman's Organisation
DNCC-CN	82	Brian Flanagan
DNCC-CN	97	Wind Energy Ireland
DNCC-CN	103	Killybegs Marine Cluster
DNCC-CN	120	Bettina Bartmann

#### **Summary of the global issues related to economic development raised in the submissions:**

TII note the function of the national road network in terms of catering for strategic traffic, which in turn supports access to markets and economic growth. TII thus advise that proposals that would be detrimental to national road infrastructure should not be developed as such proposals would be detrimental to economic competitiveness. The TII submission also acknowledges the fact that the availability of a safe, secure and reliable supply of electricity is an essential requirement for Ireland's current and future economic wellbeing but notes that grid connections from electricity infrastructure should not be allowed to compromise the national road network.

The ESB submission highlights the provisions in the RSES to the effect that there is a need for new and reinforced electricity transmission infrastructure to, inter alia, ensure that the energy needs for future economic expansion can be delivered in a sustainable and timely manner. The submission makes reference to a potential major opportunity for economic growth along the western seaboard, via the development of the offshore wind energy industry, which in turn could become the catalyst for a broader 'offshore wind enterprise zone'. ESB notes that investment in infrastructure is crucial to the economic wellbeing of the country and argue that there is a significant multiplier effect from such investment that stimulates growth in the local economy.

The submission from Fermanagh and Omagh District Council (FODC) notes that many of the challenges regarding economic development in Donegal are similar to those encountered in the

FODC area, most notably the high level of commercial vacancy, the changing nature of town centres and the need for strategic serviced land initiatives to facilitate economic development.

Under the heading 'Economic Development and Employment', the OPR notes the RSES ambitions to create a vibrant economy in the north-west and highlights the key roles of the Atlantic Economic Corridor and Donegal's cross-border relationship with Northern Ireland (including in particular the relationship between Letterkenny and Derry City). With regard to the latter, the OPR acknowledges the ongoing work of DCC with Derry City and Strabane District Council in respect of the 'Gateway to Growth' and advises that such initiatives should be supported by the new CDP in targeting employment and economic growth to the Regional Centre of Letterkenny. The OPR advises that economic and employment opportunities in the rural area should also be supported and makes reference to NPO21 and NPO23 of the NPF, which advocate economic diversification and sustainable agricultural practices in rural areas amongst other things. With regard to the marine sector, the OPR advises that objectives should be included in the CDP to support economic growth and employment in Killybegs and Greencastle. As regards employment zoning throughout the County, the OPR makes reference to the Development Plans Guidelines for Planning Authorities – Draft for Consultation (2021) – now adopted, which requires a clear and strategic evidence-based rationale to underpin the zoning of land for employment purposes in the new Development Plan. Any such zoning should also be consistent with requirements for sustainable settlement and transport strategies.

The NWRA submission notes that the Letterkenny Regional Growth Centre Strategic Plan (RGCSP) sets an ambition for a jobs to population growth ratio of 1:2 and advises that this should be taken into account when examining the quantum of strategic land/opportunity sites. The submission also states that the west of the County has suffered from a lack of enabling investment over the years and a decline in traditional industries has compounded economic decline in the area. The NWRA note the publication of Údarás na Gaeltachta's new Gaeltacht Strategy aimed at delivering economic growth and advises that the scope of this strategy is detailed in the RSES (RPOs 5.8-5.12). The NWRA advises that the climate action ambitions within the RSES are cross-cutting and reference is made to the development of the bio-economy, noting that the new CDP should give effect to the ambitions for bio-refining hubs (RPOs 4.27 – 4.29 of the RSES). Also related to the economic development of the County, the NWRA advises that the CDP should consider the return to stable growth of the tourism industry and the opportunities for growth arising on foot of the formation of the new Atlantic Technological University.

The submission from Údarás na Gaeltachta sets out details of the broad range of functions fulfilled by the organisation, inclusive of those that support economic development and employment. Údarás advise that infrastructural development will be a primary driver of the Gaeltacht and national economies. The submissions advocates support for a productive natural resources sector to increase income, productivity, innovation and output in Gaeltacht areas and argues that new ways could be identified to map latent resources within areas such as community enterprise; it is also contended that new interventions could be developed in the area of training and skills. The submission also recognises the importance of the marine sector (inclusive of aquaculture, renewable energy technology and marine tourism) in the creation of employment opportunities and the potential this sector has to bring significant direct socio-economic benefits and growth in the local and regional economy; the submission calls for support of these important sectors in the CDP. The importance of the technology sector to the economy of Gaeltacht areas is noted, as are opportunities for remote

working (the development of the digital gteic Gaeltacht network is cited in this regard) and the submission notes that gteic, DCC and Údarás will need to work in partnership to promote remote working and develop policy that improves access to essential business services. With regard to tourism, Údarás note that this industry (which is stated to be a particularly valuable asset) can bring additional spend and jobs to a region, but can also bring challenges and thus needs to be managed correctly. Údarás submit that the CDP must recognise the importance of sustainable tourism (with a focus on cultural tourism), green and blue infrastructure and options for tourist accommodation.

In addition to the issues raised by the prescribed bodies, the following were raised in the submissions:

- Donegal's geographic Far eastern trading potential should be recognised, and support should be sought for an extension of the TEN-T 'North Sea to Mediterranean Maritime Corridor' northwards to encompass Lough Swilly and Lough Foyle.
- The need to project to the EU that Strabane, Letterkenny and Derry are allied to the same trading core where inclusive population equates to being Ireland's fourth largest city.
- The need to protect the natural landscape and built heritage of the County whilst at the same time capitalising on the economic development potential offered through the tourism sector. Recognition should also be given to the economic development potential offered by agriculture, the marine sector, the service industry and the renewable energy industry.
- The need to improve regional connectivity and address infrastructural deficiencies to facilitate economic development (with particular reference to Ballybofey-Stranorlar).
- The high level of vacant commercial units in both large and small urban areas.
- The need for strategic serviced land initiatives, particularly in border locations.
- The need to nurture economic ties between Letterkenny and Derry and deliver relief roads around the former.
- The need to recognise Foyle Port as a key economic driver for the entire north-west region.
- The need to support the continued development of Greencastle Harbour.
- The need to support the continued development of Killybegs Harbour, noting in particular the growing range of alternative activities occurring there (e.g. cruise liners, marine engineering, wind energy activities, marine tourism) and the potential of the offshore renewable energy industry. One submission recommends continuing with the current approach for Killybegs as set out in the CDP 2018-2024, which identifies Killybegs as a Development Centre for marine resources including 'food, energy and ocean energy'.
- The need to support indigenous business rather than depending on FDI and to lobby for tax incentive schemes for new small businesses.
- The need to transition to a low-carbon economy and the contribution that the wind energy sector provides in terms of employment.

**Opinion of the Chief Executive in relation to the issues raised regarding Economic Development:**

The current County Development Plan recognises that County Donegal has many advantages for potential investors wishing to locate and develop, not least the quality of life on offer, a supply of highly qualified graduates from the Atlantic Technological University and other education and training institutions and the fact that the County is part of a larger sub-region with Derry city, thus

offering a critical mass of population and as wide a range of services as any other location in the country.

Notwithstanding the opportunities that exist in the County, there are also challenges to be addressed. For example, there is a need for improved inter-regional connectivity, and in this regard the new Plan should continue to safeguard and improve our strategic road network as a key support for future economic growth. Also in terms of infrastructure, there is significant potential for the development of renewable energy technologies (and the support services that enable such technologies) and thus the new CDP should continue to facilitate the development of grid reinforcements as required and include policy that allows for the sustainable development of renewable energy proposals at appropriate locations.

The diverse geography and characteristics of Donegal are such that a wide range of economic sectors have the potential to thrive in this County, and the new CDP should be drafted to support and encourage these sectors; including tourism, the marine and blue economy, ICT and digital enterprise, life sciences, agri-tech and agri-food (and farm diversification generally), retail, manufacturing and engineering. Building on the strengths of the current Plan, the new CDP should continue to recognise the opportunities afforded by both urban and rural areas, including the distinct offering of the Donegal Gaeltacht and Islands, and should contain policy that aids in addressing the issue of vacancy and dereliction throughout the County. A further key consideration in the drafting of the new CDP will be to ensure that an adequate supply of land is zoned to facilitate economic development at appropriate locations throughout the County.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the Economic Development policies to be included in the Plan be guided as follows:**

- Ensure continued support for the North-West City Region initiative, working in partnership with Derry City and Strabane District Council.
- Ensure continued support for the development of the Trans-European Network for Transport (TEN-T) in Donegal, to support connectivity to and through the County and to improve access to markets. Ensure also that the Atlantic Economic Corridor (AEC) concept is fully supported in the CDP.
- Ensure continued support for the sustainable development of Donegal's marine infrastructure and port facilities, with recognition of the varied range of economic activities undertaken at port locations and the potential for further economic diversification.
- Recognition of the role of climate action as an economic opportunity, in the context of renewable energy technologies and remote working opportunities.
- Recognition of the potential of the bioeconomy in terms of the economic growth of the County.
- Ensure that the CDP supports existing and emerging sustainable tourism uses, as a key contributor to the local economy.
- Ensure that the economic development strategy of the CDP provides for proportionate growth throughout the County and identifies a suitable quantum of zoned land to cater for new and/or expanding commercial uses.

## Themed Response 6: Transport

A total of 12 submissions received made reference to transportation issues.

Transport		
<b>Submission from prescribed bodies</b>		
DNCC-CN	25	Transport Infrastructure Ireland
DNCC-CN	57	National Transport Authority
<b>Submissions from the Public:</b>		
DNCC-CN	8	Eithne O Sullivan
DNCC-CN	14	Mark Grant
DNCC-CN	33	Sinead Egan
DNCC-CN	35	David Barnes
DNCC-CN	42	Bronagh Heverin
DNCC-CN	56	Margaret Fitzgerald and Ian Davis
DNCC-CN	58	Letterkenny Glass
DNCC-CN	59	Ailbhe O Monacháin
DNCC-CN	68	Lár Chomhairle Paróiste Ghleann Cholm Cille
DNCC-CN	70	Foyle Port
DNCC-CN	124	Barrack Hill Town Plan Steering Committee

### **Summary of the global issues raised in the submissions:**

TII's submission sets out the importance of protecting exchequer investment and ensuring the network of national roads continues to fulfil its primary strategic function of providing for inter-urban and inter-regional connectivity and thus enhancing economic competitiveness and regional accessibility. Careful management in terms of zoning and access to national roads is advocated. TII's submission also highlights how the Core Strategy can impact on the strategic road network and stresses that the role and function of the county's national roads must be given due consideration in the formulation of the Core Strategy.

The TII submission acknowledges the status and importance of the Regional Growth Centre of Letterkenny and welcomes the RSES's requirements for the preparation of a Local Transport Plan for the town.

The submission references TII's development, in collaboration with Donegal County Council of national roads schemes and advises that the CDP policies and objectives should protect both these new schemes and also improvements schemes.

Finally, the TII submission details specific advice and requirements relating to road safety, service areas, signage, safeguarding national road drainage regimes, and renewable energy.

The National Transport Authority's (NTA) submission responds in relation to the options paper, the RSES and the National cycle Manual under the following headings:

1. Recommends that the extent and location of industry, employment and other commercial type land uses should be focused on locations that can be served with more sustainable transport options.

2. Recommends an assessment of inter-settlement travel patterns across the County and to key settlements in neighbouring counties, in order to better understand travel patterns and associated transport infrastructure and services requirements. This could usefully inform both the formulation of land use policies which can affect more sustainable travel pattern outcomes, as well as the transport infrastructure and services needed to meet existing and future inter settlement travel demand.
3. The need for the preparation of a local transport plan for Letterkenny.
4. Recommends a strong emphasis should be given in the Plan to the importance of sustainable modes of transport within the County. The integration of land use and transport planning is key to ensuring that these modes are provided close to centres of population at the local level such as schools and neighbourhoods. Permeability in new areas of residential development should be considered and an objective included that the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give competitive advantage to these modes for local trip making. Supportive policies for current and future collaboration and funding input from NTA on active travel schemes should be included and further support should be provided through development management standards. TII is in the process of developing a National Cycle Network (NCN) and is inviting submissions from the public. The NCN will act as a core network connecting towns, cities and destinations across Ireland, including in Donegal. The NTA is also developing a County Cycle Network for Donegal in collaboration with Donegal County Council. These plans and investments should be acknowledged and provided for in the Plan.
5. Provision of public transport services in rural areas: the NTA recommends that the Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. Policies and objectives to support the role of rural transport, in particular the Connecting Ireland Rural Mobility Plan, should be included in the Plan.
6. Strategic road network: in order to protect the strategic transport function of national roads, the NTA recommends that development objectives should be in accordance with the DOECLG's 'Spatial Planning and National Roads Guidelines (2012)', and that this should be referenced in the Plan.
7. Recommends that parking provision for non-residential land uses should be stated as maximum standards rather than minimum requirements. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied. Cycle Parking at trip origins and destinations is a key factor in determining mode choice, and should be appropriately designed into the urban realm and new developments.
8. Accessibility, including the use of universal design that also makes the external built environment accessible to all, can make better use of public transport and active travel.
9. The Plan should include sustainable transport indicators to monitor the efficacy of policies and objectives.

The development of new Greenways in specific locations within the County is referenced, as is the development of a detailed active travel plan for Carndonagh. The subject of unregulated campervan

overnight parking at honeypot locations is also referenced with associated concerns over litter and traffic disruption. In addition, the development of rail, walking and cycling within the County should be longer-term sustainable transport options given that they are more achievable and cost effective.

The issue of traffic congestion within the strategic towns of Letterkenny and Ballybofey/Stranorlar was raised alongside the need to prioritise strategic roads projects to address this and to ensure that economic development opportunities can be realised.

**Opinion of the Chief Executive in relation to the issues raised regarding the theme of Transport and Infrastructure:**

**Road Infrastructure**

The importance of effective strategic transportation infrastructure, inclusive of the enhancement of the existing networks, for the delivery of growth and the provision of connectivity within the County and beyond is strongly reflected in the current CDP and it is anticipated that this approach will be carried forward into the new Plan.

The national roads network is afforded a high level of importance in the current CDP through the inclusion of Policy TP4 restricting new accesses onto national roads where the speed limit is greater than 60kph. Possible derogations from this policy are currently being examined in consultation with TII in the context of the 'Spatial Planning and National Roads: Guidelines for Planning Authorities' (DoECLG) Guidelines).

**Walking and Cycling (Active Travel).**

Existing and potential new walking and cycling facilities were referenced across a range of themes including 'Public Rights of Way', 'Urban Housing', 'Core Strategy', 'Tourism' and 'Regeneration'. The current CDP includes strategic-level policies on this subject. Having regard to national level policy development in this area, together with associated increased funding opportunities and the setting up of a dedicated team within the Road Design Division of the Transportation and Roads Directorate, it is likely that the existing policy framework will require some refinement.

A draft Local Transport Plan for has been developed for Letterkenny and approved by Members at the May Plenary Council meeting. This should serve as a overall strategy to guide the prioritisation and implementation of active travel projects across the town and their integration with strategic greenway infrastructure straddling the town and beyond. (please see Themed Response on Tourism for observations in relation to walking and cycling facilities).

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the policies to be included in the Plan be guided as follows:**

1. Through the safeguarding of the carrying capacity and safety of National Roads and other Strategic Routes.
2. Through the further development of the strategic road network including the Donegal TEN-T Priority Route Improvement Project and other national and regional roads.
3. In having regard to the findings of the ongoing Joint Government All Island Rail review.



4. Through the development of policies and objectives that align with other Directorates' ongoing and complementary work in effecting a modal shift from private transport to more sustainable forms and thereby encouraging active travel.
5. Through effective development management policies requiring the incorporation of effective active travel linkages in the design of future development projects.

## Themed Response 7: Natural, Built and Archaeological Heritage

### List of submissions received in relation to Natural, Built and Archaeological Heritage

Submissions from Prescribed Bodies		
DNCC-CN		Department Housing Local Government and Heritage
DNCC-CN		Office of the Planning Regulator
DNCC-CN	80	Fermanagh and Omagh District Council
Submissions From the Public		
DNCC-CN	6	O'Doherty's Keep Development Group
DNCC-CN	40	Inishowen Rivers Trust
DNCC-CN	42	Brónagh Heverin
DNCC-CN	44	Paula Harvey
DNCC-CN	63	Barbara Bradby
DNCC-CN	77	Killybegs Fishermens Organisation
DNCC-CN	78	Failte Ireland
DNCC-CN	90	Discover Bundoran
DNCC-CN	92	Gweebarra Conservation Group
DNCC-CN	93	Scott Duncann Dean Newton
DNCC-CN	94	Agnes Dolan
DNCC-CN	96	Gineador Gaoithe Teoranta
DNCC-CN	108	Cloghergor Wind Farm Ltd
DNCC-CN	109	Joseph Brennan
DNCC-CN	110	Future Energy Ireland
DNCC-CN	112	Enya Alvey

### Natural Heritage Themed Response summary of The Global Issues Raised In The Submissions and During The Public Consultation.

The submission from the Department of Housing, Heritage and Local Government emphasizes inter alia the importance of biodiversity in national policy and states that the plan should:

- Recognize the capacity for high nature value farming,
- Assess the capacity to absorb further conifer afforestation in any landscape capacity assessment.
- Support the creation of new native woodlands.
- Consider 'no net loss of biodiversity' as a standard condition for both urban and rural housing development, stress the importance of green infrastructure to ecosystems services, and acknowledge the biodiversity risk arising from blueways and greenways.
- Acknowledge the siting of wind energy in upland areas may be subject to significant environmental constraints and such risks require prevention through 'zonation'.
- Ensure sustainable water management processes to protect marine/coastal ecosystems and include an objective to protect Proposed Natura Heritage Areas.
- Provide for flood protection measures to be delivered in a planned and strategic manner, subject to environmental assessment.
- Include a dedicated biodiversity section.
- Set out commitments regarding addressing invasive species.
- Include strong objectives in relation to the protection of wetlands and peatlands.

- Protect lakeshores and uplands from inappropriate development in relation to tourism access proposals.
- Include objectives that all plans and projects should pass the Article 6(3) Habitats directive test and avoid adverse effects on Natura 2000 and acknowledge the strict protection which applies to Annex IV species.
- Contain an objective for Ecological Impact Assessment (Ecia) for any proposed development which may have a significant impact on listed and/or threatened species.

The Office of the Planning Regulator highlights the need for monitoring provisions in relation to biodiversity.

The Inishowen Rivers Trust submission inter alia highlights water quality issues, the need to consider the 3<sup>rd</sup> Cycle River Basin Management Plan 2022-2027, improve wastewater treatment and avoid hydromorphological impact, and consider biodiversity net gain. Other submissions generally highlight the need to preserve peatlands, preserve aquatic habitats, protect our landscape including from wind energy developments, and prevent cross border environmental impacts. A number of wind energy related submissions question the inclusion of certain areas as being *'not normally permissible'* for wind energy from an ecological and landscape perspective.

#### **Opinion of the Chief Executive in relation to the issues raised**

The threats to biodiversity both globally and locally are now well recognized. The EU Habitats and Birds Directives provide robust legal protections to certain habitats and species. The Water Framework Directive aims to achieve good surface water quality status by 2027. Ireland is required to protect the aquatic habitat of shellfish under the European Union Shellfish Directive. Section 10(2)(f) of the Planning Act also requires that all development plans include objectives for the *'conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of European sites'*. Furthermore, the mainstreaming of biodiversity in decision making and ensuring biodiversity conservation are key objectives of the National Biodiversity Action Plan.

However, the recent NPWS Article 17 reports indicates that many habitats are still in unfavourable status with nearly half demonstrating ongoing declines. Furthermore the recent 3<sup>rd</sup> Cycle catchment assessments indicate that many of Donegal's rivers, lakes and transitional waterbodies have a *poor* status with significant negative implications for aquatic habitats and species.

The existing CDP contains a range of biodiversity related policies and objectives including those related to the protection of: general biodiversity, SACs SPAs, NHAs, Ramsar Sites, Freshwater Pearl Mussel, trees and hedgerows, ecosystems, shellfish waters, peatlands and wetlands as well as the management of invasive species and biodiversity mitigation and it is important that the policy framework for the draft plan would continue to address these biodiversity topics.

Consideration should be given to implementing departmental recommendations as referenced above. The Plan should also recognize the potential for high nature value farming, acknowledge the negative impacts of large-scale conifer afforestation on biodiversity and support the conversion of existing conifer plantations and/or the creation of new native woodlands as per the departmental recommendations. However, whilst the plan should strive to avoid net losses of biodiversity at an aggregate level the imposition of *'no net loss of biodiversity'* standard condition for all new development would be impracticable for smaller developments in the county.

As such it is considered the new plan has a key role in protecting and enhancing biodiversity, the protection of biodiversity must permeate all sections of the development plan, and the plan should include a dedicated subsection on biodiversity with robust policies and objectives (see below).

**Landscape** forms a critical part of Donegal's natural heritage. The EU's Landscape Convention introduces a concept centred on the quality of landscape protection, management and planning, and the Planning Act requires that the plan includes objectives for:

- *'the preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires including the preservation of views and prospects and the amenities of places and features of natural beauty or interest;'* Section 10(2)(e) refers.
- *'landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscapes and developed having regard to the European Landscape Convention ...'* Section 10(2)(p) refers.

It is an objective of the National Landscape Strategy for Ireland 2015-2025 to *provide a policy framework .... for the sustainable stewardship of our landscape* and to implement policies that are complementary and mutually reinforcing. Action 4 of said Strategy was implemented at the local level in Donegal by the preparation of a Landscape Character Assessment for Donegal in 2016. Furthermore, it is a Regional Policy Objective of the RSES to; *Protect manage and conserve the quality, character and distinctiveness of our Landscapes and seascape.*

The existing CDP identifies and maps 3 scenic amenity landscape designations, namely Areas of Especially High, High and Moderate Scenic Amenity. The Plan also identifies a range of views and prospects. This is in turn supported by a range of objectives and policies pertaining to said scenic amenity designations and the protection of other landscape features (e.g. coastlines, Glenveagh National Park, skylines, views and prospects of special amenity value etc.). In addition, other sections of the plan (e.g. tourism) contain policies which exclude certain forms of development in certain landscape designations.

Having regard to the above context it is essential for the plan to: identify scenic amenity landscape and seascape designations and views and prospects and other amenities of places and features of natural beauty or interest (including reviewing existing designations) and provide for the appropriate preservation, protection, and management of the quality, character and distinctiveness of such landscape and seascapes having regard to the European Landscape Convention though a complementary and mutually reinforcing landscape policy framework (See recommendations below). There is also considerable merit in retaining certain existing policies related to features of natural beauty and interest (e.g. policies related to the County's coastline, Glenveagh National Park, the protection and ridgelines and skylines and views and prospects between roads and the sea, lakes and rivers) and an opportunity for greater efficiency in the existing landscape policy framework.

#### **Recommendation of the Chief Executive on the policies to be included in the Draft Development Plan.**

Based on the above it is considered that the draft development should include policies and objectives (and associated mapping) which broadly aim to:

#### **Biodiversity:**

- Protect and enhance Donegal's biodiversity.

- Ensure bio-diversity by conserving, maintaining and restoring habitats and species in compliance with the provisions of the Habitats Directive and the Birds Directive, including ensuring that development proposals do not adversely affect the integrity of SACs and SPAs, and supporting the implementation of the All Ireland Pollinator Plan.
- Protect other areas designated for biodiversity including Proposed Natural Heritage Areas, and RAMSAR sites as core ecological features in the county.
- Protect aquatic habitats by ensuring compliance with the Water Framework Directive including preventing deterioration of surface and ground waters and enhancing and restoring surface waters in order to achieving good surface water status.
- Protect and improve the integrity of Shellfish Waters in compliance with the European Union Shellfish Directive and associated programmes
- Ensure the conservation and management of Peatlands and the protection of Wetlands due to their biodiversity, and carbon sequestration value.
- Ensure that new large-scale residential development results in no net loss of biodiversity by protecting and incorporating existing ecological features into new development and undertaking compensatory measures as appropriate
- Protect significant stands of existing trees and woodlands and seek increased planting as part of new development proposals and support the creation of new native woodlands.
- Protect and conserve hedgerows, stone walls, and traditional field boundaries as natural wildlife corridors where possible and appropriate including adopting best conservation practice in the management of hedgerows.
- Prevent the spread of invasive species through the implementation of targeted measures and through development management assessment and control measures.
- Ensure that the provision of new green, blue and tourism infrastructure takes into account and avoid where necessary the sensitivities of natural heritage including in site selection the through the application of a precautionary principle within areas of high ecological interest.
- Ensure that new flood protection measures are provided in a planned and strategic manner subject to environmental assessment.

#### **Landscape**

- Identify and designate landscapes and seascapes of scenic amenity value in accordance with best practice (including a targeted review of existing designations) and provide for the appropriate preservation, protection and management of the quality character and distinctiveness of same commensurate with their scenic value.
- Identify significant views and prospects (including a review of existing designations) and provide for the preservation of same.
- Provide for the protection of the County's coastline from inappropriate development.
- Protect the character of the main approach roads to Glenveagh National Park.
- Safeguard prominent skylines and ridgelines from inappropriate development.
- Protect and enhance the landscape character of the islands.
- Preserve views and prospects between public roads, the sea and lakes in accordance with specific criteria.
- Protect the integrity and heritage value of designated County Geological Sites.

#### **Built Heritage Themed Response Summary of The Global Issues Raised In The Submissions and During The Public Consultation.**

The Department's submission recommends policies and objectives to identify built heritage at risk from climate change and to promote adaptation but otherwise does not make specific comments on built heritage. The Office of the Planning Regulator submission also does not make any specific

comments on built heritage. Other public submission inter alia cited the need to protect built heritage and the difficulty in obtaining public liability insurance to safeguard same.

### **Opinion of the Chief Executive in relation to the issues raised**

Donegal possesses a wealth of built heritage including iconic historical buildings and structures (e.g. St Eunan's Cathedral and Glenveagh Castle), vernacular and thatched buildings, clachans, traditional shopfronts and streetscapes (e.g. Ballyshannon and Ramelton). This currently includes 466 structures on the Record of Protected Structures (RPS) 2228 structures on the National Inventory of Architectural Heritage (NIAH) and 2 Architectural Conservation Areas (ACA's) in the County. Furthermore, there is a Ministerial recommendation that an additional 1762 structures be added to the Record of Protected Structures.

Such heritage represents an invaluable cultural and historical asset which makes a highly important contribution to Donegal's sense of place, quality of life, culture, and tourism offering. In addition the reuse and refurbishment of our built heritage provides significant potential in terms of revitalising our towns and villages, addressing the housing crisis, supporting tourism and economic development, providing skilled employment and helping to lower Donegal's overall carbon footprint and aligning with the governments 'Housing for All' and 'Town Centre First' policies. Indeed, the Council has already realised part of this potential in award-winning heritage-led regeneration projects located in the Cathedral Quarter Letterkenny, Ramelton and Ballyshannon and through other funding streams. However there has been a significant loss and deterioration in Donegal's built heritage over the current plan period.

S.10(2) of the Planning and Development Act 2000(as amended) requires all development plans to include objectives for:

- (f) the protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.
- (g) the preservation of the character of architectural conservation areas.

In addition, Architectural Protection Guidelines recommend policies to: ensure the protection of architectural heritage, identify potential structures for protection, identify ACA's, promote the reuse of redundant protected structures, take into account impact on protected structures, and policies to assist owners of protected structures.

The existing CDP contains a range of built heritage related policies and objectives including, for example, policies to: protect architectural heritage on the RPS, review the RPS, retain protect, reuse and refurbish vernacular structures, conserve streetscapes, retain historic shop fronts, protect the character of heritage towns, conserve the architectural heritage of the islands, and identify Architectural Heritage Areas. Many of these policies have considerable merit. However, there are significant opportunities to make this policy framework more robust and efficient and user friendly.

### **Recommendation of the Chief Executive on the policies to be included in the Draft Development Plan**

Based on the above it is recommended that the Draft Plan includes policies and objectives (and associated mapping) structured around the following 3 key themes:

#### **1) Record of Protected Structures**

- Explicitly protect structures on the Record of Protected Structures, including proactively engaging with owners to ensure same.
- Facilitate further additions to the RPS in line with ministerial recommendations.

## 2) Architectural Conservation Areas

- Spatially identify and preserve the character of existing Architectural Conservation Areas.
- Consider the merits of identifying and designating new ACAs.

## 3) Built Heritage without Statutory Protection

- Provide an appropriate level of protection to other specific categories of architectural heritage (e.g. NIAH, Vernacular etc) including remaining thatched structures.
- Facilitate the appropriate re-use and refurbishment of vernacular structures.
- Conserve and enhance historic streetscapes and ensure the appropriate protection, and sensitive treatment, of built heritage in public realm schemes.
- Retain historic shop fronts.
- Conserve the architectural heritage of the Islands.
- Identify built heritage at risk from climate change and support appropriate measures to improve the resilience and adaptation of such heritage.
- Record existing built heritage proposed for re-development or demolitions through appropriate architectural or photographic surveys.

### Archaeological Heritage Themed Response -Summary of The Global Issues Raised in The Submissions and During the Public Consultation.

#### Archaeological Heritage

The Departments submission recommends, inter alia, that the Plan include:

- A specific archaeological heritage chapter and an explanatory statement on such heritage.
- Archaeological heritage protection policies including the protection of monuments, wrecks, access to same, consideration of archaeology in the development process etc.
- Specific archaeological protection objectives including the protection of above ground features, the in situ preservation of various forms of such heritage, securing the setting, character and amenity of historic battlefields, the protection of historic graveyards and preserving the character, interest and amenity of landscapes of archaeological interest.
- Specific development control objectives and policies including: the carrying out archaeological assessment prior to granting permission in certain cases; the referral of certain developments to the department; refusal of permission where development cannot be carried out in a manner compatible with the protection of archaeological heritage; grants of permission to contain appropriate archaeological protection conditions etc.
- Climate change related archaeological protection policies and objectives including identifying such heritage at climate change risk, undertaking climate change vulnerability assessments.
- The identification of the contents of the Record of Monuments and Places, the Wrecks Record, and a list of Historic Monuments and National Monuments in the plan.
- An objective on the protection of underwater archaeology.

Other public submissions cited the project to develop O'Doherty's Keep, Buncrana as an indoor attraction with visitor access and interpretative facilities, and highlighted the need to maintain access to sites of archaeological heritage and associated issues of public liability insurance.

In addition, in the online survey:

- In the response to *Question 18: What are the most important parts of Donegal's built heritage?* the most favoured responses included Archaeological Heritage (113) and other traditional structures not currently legally protected (87).

## **Opinion of the Chief Executive in relation to the issues raised**

### **Archaeological Heritage**

The existing plan recognizes the cultural and historic importance of Donegal's archaeological heritage and includes several objectives and policies aimed at protecting these assets pursuant to the requirements of Section 10(2)(f) of the Act. The importance of archaeology should continue to be recognized in the new plan by having a dedicated section containing a clear explanatory statement which enables both the public and developers to easily understand and have due regard to the various types of archaeology which are protected under various legislative provisions. The need for an overarching objective not only protecting but striving to achieve a greater public knowledge, appreciation and physical access to archaeology is also considered necessary. In turn said objective should be achieved by a robust policy framework protecting (in logical sequence) the various forms of archaeology (including marine) and their settings in accordance with government archaeological protection guidelines (including appropriate assessment, monitoring etc.). However, it is considered that this policy framework should strike an appropriate balance between providing a robust level of archaeological protection whilst also being concise, and easy to understand and implement. In addition, the text should articulate that existing archaeological legislation does not preclude key strategic infrastructure projects (e.g. TEN-T PRIPD). Finally, it is considered that links to relevant spatial datasets should be provided in the electronic version of the plan.

## **Recommendation of The Chief Executive On The Policies To Be Included In The Draft Plan**

### **Archaeological Heritage**

Based on the above it is recommended that the plan should include a dedicated subsection on archaeology with:

- A definition of archaeology.
- A concise explanatory overview of the key legislation and associated archaeological monument types (e.g. Recorded Monuments (RMP), Historic Monuments (RHM), National Monuments, Historic Graveyards, Zones of Archaeological Potential and maritime archaeology/historic wrecks/underwater cultural heritage) and associated electronic links to the relevant online datasets.
- An overarching objective to appropriately protect archaeological heritage, achieve a greater public knowledge and appreciation of archaeology and improve public access to same.
- A robust policy framework to:
  - Protect all of the abovementioned archaeological types as well as unrecorded and designated archaeology and their settings in accordance with the principles set out in the publication 'Framework and principles for the Protection of Archaeological Heritage' (including the carrying out of archaeological assessment and monitoring, imposing appropriate planning conditions the maintenance of such heritage in Council ownership and talking enforcement action as required) subject to appropriate safeguards for the facilitation of strategic infrastructure projects.
  - Secure the character, amenity and setting of historic battlefields.
  - Preserve the character, interest and amenity of landscapes of particular archaeological and historical significance.
  - Protect existing, and support new, public access to archaeological heritage.
  - Provide improved signage to, publicity of, and interpretative facilities for archaeological heritage.
  - Support community led archaeological initiatives.
  - Undertake climate change adaptation measures including identifying archaeological heritage at risk and preparing and implementing appropriate adaptation strategies.



- Facilitate the provision of commemorative statues and memorials subject to specific criteria.
- Provide an interactive and searchable online map for the Record of Monuments and Places and Register of Historic Monuments to complement existing associated datasets.

## Themed Response 8: Climate Change

### Reference numbers of submissions received in relation to Climate Change:

Submissions from Prescribed Bodies		
DNCC-C2	89	Department of the Environment, Climate and Communications (DECC)
DNCC-CN	123	Dept. of Agriculture & Rural Affairs (NI)
Submissions from the Public		
DNCC-CN	28	Ivernia Energy Limited
DNCC-CN	39	ESB
DNCC-CN	46	Irish Water
DNCC-CN	74	Sinbad Marine Services
DNCC-CN	77	Killybegs Fisherman's Organisation
DNCC-CN	92	Gweebarra Conservation Group
DNCC-CN	95	Mulmosog Wind Ltd
DNCC-CN	96	Gineador Gaoithe Teoranta
DNCC-CN	97	Wind Energy Ireland
DNCC-CN	101	Canavan Associates
DNCC-CN	105	Planree Energy Ltd
DNCC-CN	106	Office of the Planning Regulator
DNCC-CN	108	Cloghercor Wind Farm Ltd
DNCC-CN	110	Future Energy Ireland
DNCC-CN	111	Eirgrid
DNCC-CN	112	Enya Alvey
DNCC-CN	120	Bettina Bartman

### Summary of the global issues related to climate change raised in the submissions:

The submission from the DECC notes the legally-binding climate targets of a 51% reduction in greenhouse gas emissions by 2030, as established under the Climate Act, and specifically draws the Council's attention to Section 15(1) of said Act requiring public bodies to perform their functions in a manner consistent with the Climate Action Plan, Climate Action Strategy, National Adaptation Framework, national climate objectives etc. The submission states that the target of delivering 80% of Ireland's electricity from renewable sources by 2030 will come from a combination of onshore and offshore sources, including 5GW of offshore wind energy, and notes that the development of significant Offshore Renewable Energy (ORE) is required to meet the 2030 target.

The submission from ESB also references the target of reducing greenhouse gas emissions by 51% by 2030 and notes that the Climate Action Plan supports emerging offshore renewables technologies. The ESB advocates support for innovative renewable technologies including hydro, onshore and offshore wind, solar, wave energy, energy storage systems and hybrid renewables. The OPR notes that carbon emissions are a central issues to be considered in the Plan and advises that the OPR evaluation of the Plan is required to address matters under S.10(2)(n) of

the Act. The OPR also advises that: the new Plan should give effect to the RSES ambitions on potential bio-refining hubs; the National Sustainable Mobility Policy aims should be factored into the Plan; and the identification of a decarbonising zone in Donegal is required under the Climate Action Plan 2021.

Many of the submissions reference the need for renewable energy sources to contribute towards climate change targets. In this regard, comments specifically in relation to renewable energy can be found in Themed Response No. 4 above. The public submissions also note, that –

- The policies in the CDP should be in line with national and international climate targets, which are aimed at reducing greenhouse gas emissions.
- We cannot engineer our way out of the climate emergency.
- The expansion of the Irish economy and population has contributed to a significant increase in greenhouse gas emissions and climate change is recognised as the most significant policy nationally and internationally.
- It is a goal of the government to achieve a transition to a low-carbon climate-resilient and environmentally sustainable economy.
- The CDP should aim to integrate the contents of publications such as the OPR publication 'Climate Action and the Local Authority Development Plan: OPR Case Study Paper CSP05' and Project Ireland 2040 – the National Planning Framework.
- The COP26 Climate Conference aims to secure net zero greenhouse gas emissions by mid-2050; the Glasgow climate pact recognised the climate emergency and accelerated action to move away from fossil fuels.
- The Climate Action and Low Carbon Development (Amendment) Bill 2021 (sic) creates a statutory responsibility to achieve a transition to a climate-resilient biodiversity-rich environmentally sustainable economy by 2050.
- Urgent implementation of all climate plans and polices will be needed for Ireland to meet climate targets.
- We should adapt to, and mitigate the effects of, climate change by re-using buildings, increasing tree planting, constructing more cycling and walking infrastructure, avoiding development in flood risk areas, providing more public transport and using more sustainable drainage systems.

**Opinion of the Chief Executive in relation to the issues raised regarding climate change:**

Climate action has become a significant influence on planning policy, both in terms of mitigating the effects of climate change and adapting to the already-present effects of global warming. The Planning and Development Act 2000 (as amended) requires that Development Plans include objectives to promote sustainable settlement and transportation strategies, including reducing energy demand, reducing anthropogenic greenhouse gas (GHG) emissions, and addressing the necessity of adapting to climate change. Objectives of this nature should permeate throughout the entirety of the new CDP to ensure, inter alia, the creation of sustainable settlement patterns that serve to facilitate efficient transport networks and energy efficient, future-proofed development. It will also be necessary to facilitate the development of sustainable renewable energy sources at appropriate locations (this matter is dealt with in more detail in themed response 4: Renewable Energy).

Given the cross-cutting nature of climate impacts, the new CDP should include a dedicated Climate Action chapter that sets out a cohesive framework of mitigation and adaptation policies that will be applicable across varied sectors and development proposals. In constructing this chapter, it will be necessary to have regard to, inter alia: the Council's Climate Adaptation Strategy (and the forthcoming Council Climate Action Plan); the Government's Climate Action Plan (2021); the provisions of the Climate Action and Low Carbon Development Act 2015 (as amended), the NPF and the RSES.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the policies on climate change to be included in the Plan be guided as follows:**

- The CDP should provide for compact settlement patterns that facilitate efficient public transport systems, the roll-out of active travel and permeability.
- Development management standards should support the broader climate action and core strategy objectives, by providing for the energy efficient design and layout of development, inclusive of nature-based solutions such as increased tree planting, green infrastructure and sustainable urban drainage systems.
- The plan should ensure that future infrastructure and buildings are planned and built in consideration of future flood risk projections.
- The plan should include policies to protect biodiversity as a key contributor to both climate change mitigation and adaptation.
- The plan should contain policies that facilitate the development of renewable energy technologies at appropriate locations, inclusive of large-scale and micro-renewables.
- The plan should include a key set of performance indicators and a baseline to enable monitoring and review of policies (e.g. transport modal share %, cycling lanes (km), housing unit densities (units/ha), renewable energy MW).

## Themed Response 9: Marine & the Islands

### Reference numbers of submissions received in relation to the Marine and/or the Islands

Submissions from Prescribed Bodies		
DNCC-CN	3	Department of Agriculture Food and the Marine
DNCC-CN	7	Inland Fisheries Ireland
DNCC-CN	39	Electricity Supply Board
DNCC-CN	107	North West Regional Assembly
DNCC-CN	118	Udaras Na Gaeltachta
DNCC-CN		Northern Ireland Environment Agency
Submissions from the Public		
DNCC-CN	9	Ronald Ferguson
	34	Comharchumann na nOileán Beag
DNCC-CN	43	Irish Farmers Association
DNCC-CN	74	Sinbad Marine Services
DNCC-CN	77	Killybegs Fishermens Organisation
DNCC-CN	100	Síle Uí Ghallachóir
DNCC-CN	103	Killybegs Marine Cluster

### Summary of the global issues raised in the submissions:

The submissions note, inter alia, the critical importance of the fisheries industry/resource and aquaculture (inclusive of the added-value processing sectors) and advise of the need to protect these sectors and the resource itself. Killybegs, being the State's largest fisheries harbour, is noted as being of vital importance and the Killybegs Marine Cluster submission stresses the need for regulatory and planning support to address urgent challenges such as the need for enabling infrastructure (pier extension) and the need for proactive marine spatial planning. The Killybegs Fisherman's Organisation recommends that the Council, as a designated Competent Authority for the preparation of Designated Marine Areas Plans (DMAP), adopt a plan-led approach to the development of floating offshore wind and use a multi-objective decision-making and constraint mapping tool to inform the preparation of DMAP(s). Other submissions reference the importance of protecting water quality, physical habitat, hydrological processes and commercial sea-fishing

activities. The importance of the recreational angling sector is also noted and the use of the precautionary principle is advocated generally when considering the fisheries resource.

The ESB submission references the need for offshore wind energy developments to contribute towards the energy mix required to achieve the Government's climate action targets. The submission further notes that the energy resource available to floating offshore wind off the coast of Ireland is immense and advises that the Climate Action Plan supports emerging renewable technologies and further research in this field. The submission refers to the new marine area consenting regime that is to be put in place following the enactment of the Maritime Area Planning Act and expresses support for the inclusion of CDP objectives that would facilitate wave energy developments.

The NWRA submission notes, *inter alia*, that the role and diversification of Killybegs should be examined in the CDP. The submission further notes that there may be an opportunity to expand Killybegs and Greencastle harbour infrastructure and advises that the feasibility of pursuing European TEN-T Comprehensive Port Status for Killybegs should be considered as part of the CDP review process.

The importance of marine tourism is also noted in the submissions received, and by association the need to provide and maintain facilities that facilitate this sector (e.g. quays, harbours etc.). Also on the theme of marine infrastructure, the submission from Sinbad Marine Services specifically references the need for funding to implement actions identified in the Byrne Looby report, which identified enabling infrastructure requirements for Killybegs, such as a 250m pier extension and new synchrolift.

The centrality of the marine sector in terms of the Gaeltacht economy is noted in the submission from Údarás na Gaeltachta, which advocates support for - sustainable aquaculture, development work on Gaeltacht piers, training re. seaweed harvesting, development of a seaweed biorefinery in the Donegal Gaeltacht and incorporation of certain strategic objectives from the National Marine Planning Framework into the new CDP (dealing primarily with environmental impacts, tourism and community development and access to marine and coastal resources).

On the subject of environmental protection, the requirement for Appropriate Assessment of projects that may have impacts on Designated Shellfish Areas is raised as an issue by the Irish Farmer's Association. The Northern Ireland Environment Agency (NIEA) also advise that in framing the CDP, consideration needs to be given to potential adverse impacts on marine protected areas within NI; this submission also draws attention to a range of UK legislation and guidance relevant to the development and protection of the marine environment and notes that development within County Donegal can potentially impact fisheries interests outside of DCC's jurisdiction. The NIEA submission notes that Ireland is a signatory to the Convention for the Conservation of Salmon in the North Atlantic and advises that the principles therein should be given full consideration in any future CDP.

A submission from a member of the public advises and provides comprehensive detail on why there is a need to rethink the north-south (RoI/NI) business perspective from a marine perspective, pursue

the development of a deep water 'artic shuttle' container traffic hub and explore expansion of employment through research and manufacturing within modern regulated freeport-zoned settings.

In terms of development of the islands, the submission from Comharchumann na nOileán Beag highlights the importance of Donegal's islands in terms of tourism and cultural heritage, noting that the Council already has an Islands Committee and states that it would be the perfect vehicle to guide and consult on the Plan. Another submission in relation to the islands raises concerns in relation to the adverse visual impact caused by the placing of mobile homes, and suggests that a plan needs to be developed that requires removal of these mobile homes if they are not being used by those who put them in place.

### **Opinion of the Chief Executive in relation to the issues raised regarding the marine sector and the islands:**

The importance of the marine sector and of our island communities is fully recognised by this Authority, and this is reflected in the policy framework of the current CDP which, inter alia, seeks to: maximise the social and economic potential of the marine sector; safeguard and improve the health of our marine ecosystem; safeguard and enhance the roles of Killybegs, Greencastle, Burtonport and Inver; and provide for the appropriate and sustainable development of the islands. The new CDP should build on this existing policy framework, taking cognisance of the National Marine Planning Framework; Government targets on renewable energy; the need to protect and sustainably manage our marine environments; the distinct culture, built and natural heritage of our islands and the challenges that those islands face.

Support for the enhancement, development and diversification of our port and harbour settlements should be to the fore in the new CDP. The content of the RSES in terms of pursuing EU TEN-T Comprehensive Port Status for Killybegs is noted. Whilst the process to attain such a designation is outside the scope of the CDP, the Plan can nonetheless provide support for this ambition, in recognition of the critical importance of Killybegs for the economic development of Donegal and beyond.

The potential for the development of offshore renewable energy is acknowledged and the new CDP shall include supporting provisions that facilitate this sector where appropriate.

On the matter of how business is conducted from a north-south perspective (i.e. RoI/NI), it is considered that the detail of such matters does not fall within the remit of the CDP. However, the new CDP can be developed with the sustainable development and economic interests of the marine sector in mind, subject to full compliance with all relevant environmental protection legislation and guidance.

In terms of angling, the current CDP specifically recognises the importance of centres such as Rathmullan, Downings and Portsalon and includes policy to 'facilitate the appropriate development of angling facilities throughout the County'. These policies can be taken through to the new CDP. On the matter of marine tourism generally, it should be noted that the current CDP contains policy support for developments connected to the cruise ship market in Killybegs and Greencastle (including berthing facilities and visitor infrastructure) and otherwise allows for the consideration of

resource related tourism product developments, thus ensuring that the County's core tourism product can be sustainably developed into the future. Again, it is considered that policies of this nature should be provided for in the new CDP.

The sustainable development of the County's islands is a key consideration for the new CDP and, as is the case presently, policy should be included to facilitate development proposals that enhance access to, and provide for the sustainable development of, the islands. It should be noted that the distinct characteristics of our islands present an offering of considerable tourism potential; however, there is clearly a balance to be struck in terms of protecting those features and landscapes that make the island communities unique. Specific comments regarding the impact of mobile homes on the visual amenities of the islands are noted.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the policies on the marine sector and the islands to be included in the Plan be guided as follows:**

- Ensure that policy in relation to the marine sector is compliant with the requirements of the National Marine Planning Framework and the Maritime Area Planning Act.
- Ensure policy support is in place to facilitate the sustainable development and realise the full potential of Donegal's marine sector.
- Recognise, protect and enhance the roles of Killybegs, Greencastle, Burtonport and Inver and facilitate the diversification of these locations towards new areas of sustainable economic opportunity.
- Provide policy support for the appropriate development of offshore wind energy projects through the adequate provision of land-based infrastructure and services, in accordance with national and regional policy and in a manner that is compatible with environmental legislation and considerations.
- Provision of policy support for the sustainable development of the blue economy including, inter alia, fisheries, aquaculture and tourism.
- Ensure that policy in relation to development of the islands provides an appropriate balance between harnessing the potential of island locations whilst protecting their environmental assets.



## Themed Response 10: Community, Culture and the Gaeltacht

### Reference numbers of submissions received

#### Community

DNCC-CN	5	Margo Gorman
DNCC-CN	10	Val O'Kelly
DNCC-CN	27	Bundoran Community Development CLG
DNCC-CN	35	David Barnes
DNCC-CN	42	Brónagh Heverin
DNCC-CN	62	An Post
DNCC-CN	68	Lár Chomhairle Paroiste
DNCC-CN	80	Fermanagh and Omagh District Council
DNCC-CN	82	Brian Flanagan
DNCC-CN	84	Department of Education
DNCC-CN	102	Alan McMenamin
DNCC-CN	107	North West Regional Assembly
DNCC-CN	120	Bettina Bartmann

#### Culture

DNCC-CN	34	Comharchumann na nOileán Beag
DNCC-CN	88	Greasepaint Production
DNCC-CN	104	The Arts Council
DNCC-CN	118	Udaras Na Gaeltachta

#### Gaeltacht

DNCC-CN	106	Office of the Planning Regulator
DNCC-CN	107	North West Regional Assembly
DNCC-CN	117	Conragh Na Gaeilge
DNCC-CN	118	Udaras Na Gaeltachta
DNCC-CN	119	Cordelia Nic Fhearraigh

### Summary of The Global Issues Raised In The Submissions and During The Public Consultation.

#### Community

A broad range of issues were raised in relation to community development including:

- The need for greater consultation and networking.
- A broader focus for community development.
- Better access for disabled and older persons.
- The upgrading of public conveniences.
- Additional provision of sporting facilities, recreational walkways and public parks, and green spaces and the dual use of school facilities.
- Parking management in the Narin/Portnoo area.
- Flexibility in the location of new postal facilities (An Post submission).
- The need for new pedestrian and cycling facilities, a proposed greenway from Carrick to Teelin, and the potential for cross border greenway linkages with Fermanagh and Omagh District Council,
- The importance of community facilities in new housing developments.

Specifically, the Department of Education submission:

- Cites the need for a collaborative engagement to support additional and enhanced education facilities, the need to identify growth over a 10-year horizon in order to make sufficient provision of school accommodation, and opportunities for potential longer term educational requirements,
- Requests that the plan:
  - Supports the provision of school accommodation including the development of new schools and the expansions or alterations of existing ones.
  - Retains Land Use zoning 'Community/Service' or equivalent that provides for educational developments.
  - Explicitly provides for school development to meet population growth arising from residential development within built up areas.
  - Includes buffer zones and land use designations that support education development adjacent to existing and established schools to facilitate future expansion.
  - Supports school sites (required to meet current needs or planned population growth) by means of an appropriate zoning provision or specific local objectives.
  - Considers siting schools adjacent to community facilities (e.g. recreation, childcare) and vice versa.
- States that the capacity of existing schools should be considered in assessing the suitability of residential lands, and that wider development should be contingent upon the provision of infrastructure and services to associated schools.

The NWRA submission requests that the plan consider RPO 7.1-7.6 (on Educational/Skills), RPO 7.8 (Slainte Care) and RPO 7.11 (Healthy Ireland) of the Regional Spatial and Economic Strategy

### Culture

The submission from the Arts Council inter alia:

- Highlights the importance of place-making in creating vibrant distinctive places, enabling social engagement, and supporting areas for arts and cultural events.
- States that the Covid-19 pandemic demonstrated that arts and culture are essential to community well-being.
- Notes the statutory requirement for development plans to include cultural objectives.
- Requests the spatial preservation of the Gaeltacht and existing cultural infrastructure and assets.
- Asserts that the development plan should recognize the value of arts and culture sector as an essential part of social infrastructure.
- Highlights the potential for the arts and cultural sector to revitalize urban areas through the re-use of underutilized/vacant buildings for artist workspaces, creative hubs and exhibition spaces or through public art in the public realm.
- Request the plan takes into account the actions and priorities in Sections 4 and 5 of *Cultúr* and Strategic Priority No. 5 of the *Council's Culture and Creativity Strategy*.
- Seeks the provision of specific clear, practical and implementable policies and objectives for arts and culture infrastructure including the identification of deficiencies in specific infrastructure informed by evidence based and needs assessment.

The submission from Greasepaint productions seeks the provision of a purpose built, fully functional theatre and performance space for the Inishowen peninsula, cites employment tourism and education benefits and identifies Bunrana as the most suitable location for same. The submission from the Comharchumann Na nOileán Beag highlights the vital importance of the islands to Donegal's culture.

## Gaeltacht

In total 5 submissions were received on Gaeltacht issues and collectively these submissions:

- Highlight the statutory support for the Gaeltacht, the designation of Language Planning areas, Gaeltacht Service town and language plans for Donegal, the drop in the daily Irish speakers in the Gaeltacht in the 2016 census and the importance of the Irish as a community language.
- Claims that young people are moving out of the Gaeltacht as they are unable to obtain planning permission on their own land and there is not enough social housing and criticizes the Council application of rural housing policy.
- States that there is a crisis in the Irish language and maintains that anyone who wants to settle in the Gaeltacht should have the ability to speak and write Irish.
- Recommends development should be promoted in Gaeltacht towns and villages, and that additional measures may be beneficial for Gaoth Dobhair and the Rosses including urban placemaking.
- Requests that the plan:
  - Contain robust language conditions for housing and other developments (including an examination of language proficiency/language impact assessment) varying by Gaeltacht type save for housing applications for electoral divisions natives, the prevention of holiday home overdevelopment, the provision of social housing on people's own land, Irish only naming of new housing developments etc.
  - Addresses the employment, housing, social infrastructure, and recreational needs of the Gaeltacht through a collaborative approach.
  - Supports the implementation of Gaeltacht Language Plan including the integration of same with the Council's policies and programmes, and the provision of services through Irish.
  - Request the plan support marine/coastal development in the Gaeltacht including fishing, sustainable aquaculture, marine access infrastructure and a seaweed biorefinery.
  - Supports the implementation and development of the Gteic network.
  - Supports Gaeltacht tourism development including strategic projects supported by ÚnaG, language tourism, outdoor pursuits, green and blue infrastructure projects in the Gaeltacht (including Bealach na Gaeltachta, Arranmore/Burtonport blueway, the small islands blueway, the Letterkenny to Burtonport Old Railway walk) and improved marine access and cultural tourism.
  - The protection of the cultural heritage in the Gaeltacht.
  - Prioritizes the Irish language/or provides Irish only business and tourism signage.

## Opinion of the Chief Executive in relation to the issues raised

### Community

The provision of a wide range of community infrastructure (e.g. health, education, recreational etc), in an accessible, socially inclusive manner is essential for the development of sustainable healthy communities. Indeed there is a statutory requirement for the plan to include objectives for: the zoning of land for *recreational and open space* (S.10(2)(a) of the Planning Act refers), the integration of planning and sustainable development with the *social and community requirements of the area* (S.10(2)(d) refers), *the preservation, improvement and extension of amenities and recreational amenities*, (S.10(2)(j) refers), and the provision of *schools, crèches and other education and childcare facilities*; (S.10(2)(j) refers).

Donegal already boasts significant community infrastructure assets including: recreational (e.g. Glenveagh National Park, Muckish Railway Walk, Burtonport Old Railway Walk, Rougey Cliff Walk Bundoran and a network of 46 playgrounds), sporting facilities (e.g. Aura Leisure Centre and the Finn

Valley Centre) a comprehensive network of primary and secondary and special education facilities, the Atlantic Technological University Letterkenny, primary and community healthcare facilities and Letterkenny University Hospital.

In general, the current CDP facilitates a range of community facilities (e.g. recreational, childcare, sheltered housing, nursing homes, childcare education etc) at appropriate locations; and conserves land zoned amenity/greenspace/open space. It is considered that much of this current policy framework is consistent with sustainable development and the views expressed in the submissions and merits retention in the new CDP..

In addition, it is agreed that the new plan should ensure that accessibility for disabled and older persons is integrated into the design of new community facilities. As recommended in the NWRA submission, it also considered that the plan should support facilities and infrastructure consistent with, or designed to implement, the government's Slainte Care and the other public health policies.

The proposals contained in the submission from the Dept. Of Education are broadly agreed.

Regarding submissions on greenways, walkways and cycleways, please refer to Themed Response 2: 'Tourism'.

### **Culture**

It is considered that Donegal's rich diverse and unique culture represents one of our strongest assets providing a strong sense of identity, affords important quality of life, recreational, tourism and economic benefits and is an intrinsic part of the wider Donegal brand. Key elements of Donegal culture include: theatre, music, public art, the Irish language and island culture. S.10(2) of the Planning and Development Act 2000(as amended) states that a development plan shall include objectives for:

- *(d) the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population;*
- *(f) the protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest;*

The current CDP inter alia: supports the public art programme, promotes culture as part of sustainable tourism; recognizes landscape as part of our culture; encourages engagement with the Diaspora; promotes the reuse of vacant/derelict buildings for the arts sector; supports implementation of the Cultural Services Strategy capital programme; prioritises central locations within settlements for large scale cultural infrastructure; supports small-scale cultural development throughout the county;and requires that new public spaces are of a high quality with an imaginative design and incorporate creative public art. Many of these objectives and policies are consistent with the sustainable development of the cultural sector and merit retention in the new plan.

The proposals contained in the submission from the Arts Council are broadly agreed.

The requests for support for the development of a purpose built, fully functional theatre and performance space for the Inishowen peninsula from Greasepaint productions is acknowledged and it is considered that the new Plan could support the principle of such a development. It is also considered that the plan should provide general support for the Údarás Na Gaeltachta cultural policy and the objectives of Comharchumann na nOileán Beag in terms of Islands Culture including new cultural infrastructure on the islands.

### **Gaeltacht**

The fundamental linguistic and cultural importance of the Donegal Gaeltacht, encompassing an area of 1502km<sup>2</sup> and a population 23,346 (representing 14.7% of Donegal's, and 23.4% of the total Gaeltacht population) as outlined in the Údarás submission is acknowledged. In addition, it is also accepted that the Council has a pivotal role in supporting the implementation of the 20 year strategy for Irish and the implementation of the 8 recently adopted language plan for the Donegal Gaeltacht as outlined in said submission. It is also noted that the development plan is specifically required to include objectives for the: *the protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language*, in accordance with S.10(2)(m) of the Planning Act.

The existing development plan inter alia; acknowledges the recent decline of the Irish language, the significant socio-economic and infrastructural challenges faced by the Gaeltacht, seeks to sustain the Irish language as a community language, supports the facilitates rural housing for native Irish speakers, requires language impact assessments for multiple residential developments, facilitates developments in Pairc Gnó Gaoth Dobhair, requires the use of Irish in public, business and community signage and commits to providing services through Irish. It is considered that much of this positive policy framework merits retention in the plan.

The current CDP contains policies regarding proficiency in the Irish language for prospective residential developers in the Gaeltacht and it is considered that these policies merit retention and further review on foot of the submissions received in consultation with other relevant agencies.

The range of other suggestions contained in the submissions as to how the language and culture can be protected, sustained and enhanced are generally agreed.

### **Recommendation of the Chief Executive on the policies to be included in the Draft Development Plan**

Based on the above it is considered that the draft development should:

#### **Community:**

- Provide for the zoning of land for recreational and open spaces uses at appropriate locations.
- Include objectives to:
  - Preserve, improve and extend amenities and recreational amenities.
  - Provide for schools, creches and other childcare facilities.
  - Supports the continued growth and expansion of the Atlantic Technological University Letterkenny including the provision of ancillary and off campus facilities.
- Include a policy/land use zoning framework which:
  - Facilitates proposals for new community-related developments at sustainable and socially inclusive locations.
  - Has regard to the capacity of local schools when assessing new multiple residential developments.
  - Supports and facilitates the provisions of childcare facilities in appropriate locations within settlements and adjacent to community facilities and public transport nodes.
  - Supports and facilitates health care facilities necessary to deliver the Slaintecare health care policies and other public health policies.

- Ensure that new community facilities (e.g. health, education sports and recreational) are designed to ensure universal accessibility including by disabled and older persons.

### **Culture**

- Include objectives to:
  - Protect structures and parts of structures which are of special artistic and cultural interest.
  - Promote, protect and harness key cultural infrastructure projects.
  - Support the development of new, and the enhancement of existing, infrastructure and space for arts and culture.
  - Support the principle of a multirole arts facility in the Inishowen Peninsula.
  - Supports the development of arts and culture in the Gaeltacht and Islands including the provision of new infrastructure through a collaborative approach with Údarás Na Gaeltachta and Ealaín Na Gaeltachta.
- Provide a policy framework which:
  - Ensures that provision of new, or the regeneration of existing, public spaces provide for creative high quality, vibrant and distinctive places, which assist social engagement, and facilitate creative public art and provide space for arts and cultural events where practical and appropriate to do so.
  - Supports and facilitates the reuse of underutilized/vacant buildings for arts and cultural infrastructure including artists workspaces, creative hubs, exhibition spaces and libraries.
  - Facilitates large scale arts and cultural infrastructure (e.g. libraries, theatres, museums, galleries) at sustainable and socially inclusive locations.
  - Protects the routes of key pilgrim paths such as the Turas Cholm Cille in Gleann Cholm Cille and Lough Derg (St Patrick's Purgatory).

### **Gaeltacht**

- Include objectives to:
  - Protect the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the Community Language in the Gaeltacht.
  - Recognise and support the implementation of the 20 Year Strategy for the Irish Language 2010-2030, language planning process, the implementation of the 8 approved language plans for the Gaeltacht and the designation of An Clochan Liath, Donegal Town and Letterkenny as Gaeltacht Service towns.
- Provide a policy framework to:
  - Support the linguistic base of the Gaeltacht by: facilitating sustainable rural housing for native Irish speakers subject to the rural housing policies of the plan, the application of language impact assessments and associated language conditions for multiple residential developments commensurate with the number of daily Irish speakers in subject area, and the provision of adequate social housing in both rural and urban locations in the Gaeltacht.
  - Support the sustainable development of the marine sector in the Gaeltacht including fishing sustainable aquaculture, seaweed harvesting and refining, coastal tourism and associated marine access infrastructure.
  - Facilitate language, cultural and recreational tourism projects in the Gaeltacht including strategic tourism initiatives promoted by Údarás Na Gaeltachta as appropriate.
  - Facilitate the delivery of Údarás Na Gaeltachta's Gteic digital Gaeltacht network (including associated innovation and creativity business centres/hubs) and the continued development

of Páirc Gno Gaoth Dobhair as a business, enterprise and manufacturing centre in collaboration with Údarás Na Gaeltachta.

- Prioritise the use of Irish in business and community signage in Gaeltacht areas.
- Prioritise and support urban regeneration and placemaking initiatives in Gaeltacht town and village in order to strengthen their socio-economic, linguistic and cultural vibrancy.

## Themed Response 11: Bundoran

### Reference numbers of submissions received in relation to Bundoran

Submissions from Prescribed Bodies - N/A		
Submissions from the Public		
DNCC-CN	8	Eithne O'Sullivan
DNCC-CN	10	Val O'Kelly
DNCC-CN	27	Bundoran Community Development CLG
DNCC-CN	35	David Barnes
DNCC-CN	72	Joe Bonner Town Planning Consultant, on behalf of Northview Leisure
DNCC-CN	90	Discover Bundoran

### Summary of the global issues raised in the submissions:

The submissions in relation to Bundoran cover a wide range of issues, from the strategic vision for the town as prepared by the Bundoran Town Team (which includes comment on, inter alia, the need for additional facilities throughout the town; the need for Bundoran to develop sustainably; the 'brand' for Bundoran; the need for accessibility; the need for a masterplan for the town that aligns with the Government's 'Ireland 2040' Plan, the County Development Plan and the forthcoming LAP, the need to develop existing natural tourist attractions in the town and the need to tackle dereliction) to specific matters such as traffic management and the need for additional community facilities.

With specific regard to traffic management, concerns have been raised in relation to traffic management on Tullan Strand Road (suggested need for speed ramps), Shene Avenue (suggested need for additional parking) and around St. Macartan's National School (suggested need for traffic management measures generally). One submission suggests that there is a need to re-examine parking charges in the town to allow for an hourly and daily rate.

The issue of developing/connecting the coastal walks through the town is raised in the submissions, with arguments for and against such development. One submission raises concerns that any proposal to link the walks from West End to Rougey may interfere with land and seascapes and may have impacts on the existing houses in the West End, whilst another cites the need to create more looped and traffic free walks, noting that the Rougey and West End Walks are popular but are disconnected. The Discover Bundoran submission also notes the potential for other walks in Bundoran (such as the Bradog River walk, for which funding has been received to carry out a feasibility study) and the potential for a one-way traffic system in the town, which could in turn free up space for cycle paths. Related to the theme of cycling/active travel, one submission raises the issue of the Erne Atlantic Greenway, noting that the development of this project would be a boost to many communities and help tourism in the area.

The issue of vacancy and dereliction is raised in a number of submissions; noting the need to tackle these issues and bring buildings back into productive use.



The need for additional community facilities comes through strongly in the submissions. Specific suggestions include facilities such as additional public toilets, a town park, skate park, additional seating throughout the town, improved access to the waterside, open space, beach wheelchair facilities and a museum area for tourists.

The need for certain infrastructural works is cited, specifically the need for regular dredging of the Thruppenny Sea Pool and the need for installation of UV filters at the water treatment plant for the town to improve water quality.

On the question of caravan park/mobile home park development in Bundoran, one submission contends that facilitating the extension of existing caravan parks would be the most appropriate course of action in this regard, and suggests that policy going forward should be liberal enough to facilitate such extensions. The submission argues that caravan parks are high density developments with residents that stay for periods of weeks, thus creating a lot of footfall in the town (more than would be generated by hotels and other similar accommodation providers) and thereby generating additional economic benefits for Bundoran in terms of consumer spend.

With regard to the matter of development at the waterfront, the Discover Bundoran submission advises that development in this area needs to be carefully managed; facilities at the main beach need to be brought up to standard, and investment is needed in new lifeguard facilities, public conveniences and a further leisure area. This submission also suggests the need for a 'thematic' approach to the development of the town (with a marine theme being the forerunner). The submission from Fáilte Ireland suggests that the new CDP should reference specific capital investments in Bundoran, such as the proposed Tullan Strand Centre for Water Sport Activities.

#### **Opinion of the Chief Executive in relation to the issues raised regarding Bundoran:**

The strategic vision for Bundoran as a year-round outdoor activity and tourist destination is self-evidently appropriate for the town and planning policy can be devised to support and complement this vision as appropriate and provide for the sustainable development of the town. Place-making principles will be central to the development of the LAP and in turn will ensure the creation of a desirable environment for residents and tourists alike and address issues such as the need to carefully manage waterfront development, traffic management, provision of public realm, vacancy and dereliction and the need for regeneration generally.

The draft 'Bundoran Tourism Development Masterplan' prepared by Fáilte Ireland is acknowledged and although in draft form, will provide useful reference material as the LAP process progresses.

On the issue of active travel through and to/from Bundoran (inclusive of the linking of existing coastal walking routes and potential greenway developments), the benefits of sustainable modes of travel from both a recreational and functional purpose are well-documented and include public health benefits, a reduction in traffic congestion and associated improvements in terms of the attractiveness of town centres, reductions in air pollution and reductions in carbon emissions. Whilst concerns raised in relation to potential impacts on visual and residential amenities are acknowledged, it must be noted that projects of this nature are subject to detailed planning, environmental and engineering assessments that aim to ensure that any adverse impacts are appropriately mitigated. Given the wide range of benefits associated with active travel schemes and the clear and pressing need for Ireland to transition to being a low-carbon and climate resilient

society, it is considered that the LAP should give appropriate policy support in principle, for the development of active travel routes.

The provision of community facilities throughout the towns and villages of the County is a key priority of the Council. Whilst matters of detail concerning the provision of certain community facilities (e.g. the location of new seating throughout Bundoran or the means of improving access to waterside locations) are outside the scope of the LAP, the plan will nonetheless contain appropriate policy supports to facilitate developments of this nature where appropriate. At a larger scale, the LAP will consider the need for the reservation of lands for amenity purposes and may identify areas where targeted public realm improvements are warranted.

The issues of vacancy and dereliction are a concern, not just in Bundoran but in settlements across the country. Please refer to Themed Response Core Strategy, Housing and Urban Regeneration.

Comments in relation to the need for specific infrastructural works such as the dredging of the Thruppenny Sea Pool and the installation of UV filters at the water treatment plant are noted but are considered to be outside the scope of the LAP process.

With regard to the issue of caravan park developments, it is acknowledged that such developments contribute to the variety of accommodation on offer in Bundoran and indeed, the economic spin-offs as a result of consumer spend from visitors to caravan parks is recognised. There is however a balance to be achieved in terms of the location of caravan parks. On the one hand, it is desirable that such facilities are within easy reach of the amenities on offer in the town centre, to enable ease of movement and maximise visitor dwell time in the town centre; on the other, it is incumbent on the Authority to ensure that sufficient lands are retained for housing purposes and that developments such as caravan parks do not unduly impact on land supply for housing.

The suggestion that extending the existing parks would be the most sustainable option going forward is noted and should be considered further as the LAP process continues, in light of all relevant considerations such as the need to maintain the vitality of the town centre year-round, potential impacts on adjoining properties/compatibility with adjoining uses, remaining capacity within existing parks and potential alternative land use requirements. Similarly, the location for new caravan parks in Bundoran should also be given further detailed consideration in view of these factors, but also in the context of land required for housing supply in Bundoran.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the policies to be included in the Local Area Plan for Bundoran be guided as follows:**

- Provision of support for the sustainable development of Bundoran as a year-round outdoor activity and tourist destination.
- Identification of lands that should be preserved for amenity purposes, inclusive of policies to carefully manage waterfront development.
- Identification of areas in need of regeneration, with a view to developing further actions to address regeneration needs, inclusive of funding applications and the imposition of levies as appropriate.

- Development of policies that support sustainable mobility, permeability, active travel and Greenway connectivity within and to/from Bundoran.
- Provision of policy support for the development of community facilities.
- Provision of policy support for the appropriate re-use and refurbishment of vacant and derelict buildings.
- An analysis of housing land requirements for Bundoran, which will in turn inform zoning proposals for housing supply and (among other considerations) zoning for uses such as caravan parks/mobile home parks.

## Themed Response 12: Buncrana

### Reference numbers of submissions received in relation Buncrana

Buncrana		
<b>Submissions From the Public:</b>		
DNCC-CN	4	Nicholas Crossan
DNCC-CN	6	O Doherys Keep Development group
DNCC-CN	28	Inveria Energy Ltd
DNCC-CN	45	The Music Box
DNCC-CN	81	John J Doherty
DNCC-CN	82	Brian Flanagan
DNCC-CN	85	Ronald Ferguson
DNCC-CN	88	Greasepaint Productions

#### Summary of the global issues raised in the submissions:

The main issues identified in the submissions may be summarised as follows:

- ~ how the town can enhance and develop its current offerings and assets to its best advantage, and how the new CDP can support this;
- ~ development of a cultural tourism attraction at 'O'Doherty's Keep';
- ~ ensuring the new CDP zones development lands in the most appropriate locations;
- ~ how the town's significant industrial textile and manufacturing past can be harnessed as an asset in terms of both employment and land use.

One submission strongly suggests that the new CDP should provide the policy support for: developments associated with the opportunities in the spin off industries related to off-shore wind energy generation and hydrogen and ammonia fuel production; and energy networks and ICT infrastructure provision for connection to the National grid.

Support is sought for social enterprise and the creation and development of cultural, musical, educational, arts and performance space to meet the needs of a town of Buncrana's size.

Housing issues are strongly referenced. This includes suggestions re:

- ~ re-examining lands currently zoned as 'Strategic Residential Reserve' and 'Residential' based on the availability of existing infrastructure and access to existing key services; this would assist in some way towards the sensitive issue of homes affected by defective blocks in the town and surrounding region;
- ~ the provision of universal housing for all age demographics and in a suitable convenient town centre location close to existing services and amenities to enable independent living for longer.

The strategic importance of the town of the wider County and region was also referenced.

Submissions also referred to the importance of - achieving 'balanced spatial growth', integrating with planned and potential public/ private infrastructure improvements, and consideration of the likelihood of lands actually being made available for housing development. Lands in the ownership of parties with no development ambitions is cited as a major contributory factor in the lack of movement on suitably-located housing sites in recent years and in past development plans.

All submissions identified the importance of investing in community and social infrastructure as a key component of town and village renewal and in particular referenced the 'Repowering Buncrana' regeneration project.

### **Opinion of the Chief Executive in relation to the issues raised regarding Buncrana themed submissions:**

Buncrana is the second largest town in the County and is therefore a key strategic consideration for the Authority. In 2020 DCC commissioned a study entitled: '*Strategic Strengths and Future Strategic Direction of Buncrana*' to examine the strategic positioning of the town in more detail. The Study was published in August, 2020 and sets out a detailed, yet high-level, strategic analysis of the inherent strengths and weaknesses of the town to inform decisions around the future positioning and direction(s) of Buncrana. This study will be central to the preparation and development of the new LAP for the town as it provides a detailed and informed baseline from which to prepare such a land use plan.

The '*Repowering Buncrana*' project, benefitting from significant funding under the Government's Rural Regeneration and Development Fund (RRDF) and match-funding of the Council will transform the shorefront area of the town, and policies to support this significant investment in the town can be included in the new CDP. Renovation of the Buncrana Leisure Centre will further enhance the attractiveness and use of the broad shorefront area.

In this positive context, a comprehensive review of the current land use zoning for the town, and particularly the housing land supply, will be undertaken as part of the plan preparation process and in the context of the Core Strategy and associated national planning policy guidelines. The likelihood of development being delivered will be a consideration in the context of the Government's emerging Residential Zoned Land Tax policy mechanism.

As noted in Themed Response 1: 'Core Strategy, Housing and Urban Regeneration', submissions in relation to the mica issue are noted, and the huge challenges posed as a result of the use of defective concrete blocks, and indeed the stresses placed on householders as a result of this issue, are fully recognised. In drafting the new CDP, the Authority should be cognisant of the need to support all relevant initiatives that are devised to address this issue and should endeavour to bring forward planning policies and land use zonings, as appropriate, that can contribute towards the satisfactory resolution of this significant problem.

The existing Buncrana Plan recognises the importance of the built heritage of the town and similar policies can be included in the new CDP.

The existing PLAN also recognises the importance of social and community infrastructure and its role in supporting and strengthening communities and this approach can be continued in the new CDP. Where a need is identified for the supply of lands for the purposes of community and social infrastructure (the school campus being a good example), the PLAN will, where possible, consider appropriate land use zoning.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the Local Area Plan for Buncrana be guided as follows:**

1. Having regard to the 'Strategic Strengths and Future Strategic Direction of Buncrana' study commissioned by DCC and prepared by consultants ICLRD and building on the findings of the study, as appropriate.
2. By alignment of the new CDP with the 'Repowering Buncrana' project.
3. Through the identification of appropriate zoned lands to meet the housing needs of the town in line with the Core Strategy requirements.
4. Identification of areas in need of regeneration, with a view to developing further actions to address regeneration needs, inclusive of funding applications and the imposition of levies as appropriate.
5. Development of policies that support sustainable mobility, permeability, active travel and Greenway connectivity within and to/from Buncrana.
6. Provision of policy support for the development of community facilities.
7. Provision of policy support for the appropriate re-use and refurbishment of vacant and derelict buildings within the town centre.

### Themed Response 13 : Public Rights of Way

A total of 29 submission received made reference in some way to the themed response of public rights of way.

Public Rights of Way		
<b>Submission from prescribed bodies</b>		
DNCC-CN	106	Office of the Planning regulator
<b>Submissions from the Public:</b>		
DNCC-CN	11	Margaret Mc Cullough
DNCC-CN	13	Tom ODonnell
DNCC-CN	16	Ruth O Donnell
DNCC-CN	17	Margaret Mc Cullagh
DNCC-CN	18	Una Brown
DNCC-CN	19	Peter Mc Loughlin
DNCC-CN	22	Ronan O Muchu
DNCC-CN	29	Nicholas North
DNCC-CN	30	Anne Murphy
DNCC-CN	32	Ashley Godden
DNCC-CN	36	Prof Alan & Mrs Kate Evans
DNCC-CN	41	Bernadette English
DNCC-CN	42	Bronagh Heverin
DNCC-CN	48	Fiona Orme
DNCC-CN	49	Guy Holis
DNCC-CN	50	Noreen Martin
DNCC-CN	52	Louis & Joan Hanlon
DNCC-CN	61	Karen Hollis
DNCC-CN	64	Randal & Paddy Hayes
DNCC-CN	65	Stephen Mc Farland
DNCC-CN	66	Maeve Carr
DNCC-CN	67	Una Walsh
DNCC-CN	69	Declan Brennan
DNCC-CN	75	Dr Fiona Hardy
DNCC-CN	76	Daisy Mules
DNCC-CN	79	Aileen Heverin
DNCC-CN	122	Bronagha Heverin (on behalf of Saveourbeachatcastelgoland.)

#### **Summary of the global issues raised in the submissions:**

Of the 28 submissions relating to this themed topic of 'Public rights of Way', 26 are specifically in relation to the alleged closing off of an alleged existing right of way in the west of the county. The submissions detail the location of the route and describe its use prior to it being closed off.

2 no. submissions set out a detailed request that the public rights of way as listed in Appendix 3 Table 15 'Public Rights of Way' of the current CDP will be carried forward and included for protection in the Draft County Donegal development Plan 2024-2030.

**Opinion of the Chief Executive in relation to the issues raised regarding the public right of way:**

Section 10(2)(o) of the Act requires that: 'The development plan shall include objectives for...the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan.'

The Office of The Planning Regulator (OPR) has issued a Case Study paper CSP01 'Public Rights of Way and the Local Authority Development Plan: A survey report on the operation of Section 10(2) of the Planning Act'. The case study sets out an informal survey of a variety of approaches in addressing Section 10(2) of the Act, compliance with which provision is acknowledged to be a challenging task. The study was undertaken to ascertain where local authorities are currently at in performing the legislative requirements of Section 10 (2) and to inform the OPR's statutory plans evaluation function. The overall aim is to ensure that development plans effectively and consistently address the issue of countryside access in the context of wider amenity provision and enhancement, placemaking and rural development matters.

The OPR's case study also clearly sets out how better access to the countryside, coastal amenities, waterways, uplands and other natural areas can be further promoted through a number of other mechanisms such as the 'Permissive Access' mechanism which complements statutory Section 10(2)(o) development plan objectives.

**Recommendation: As a result of the issues raised in the submissions, it is recommended that the rights of way policies to be included in the Plan be guided as follows:**

1. Review the contents of the existing CDP as it refers to Rights of Way.



## 2.2 Miscellaneous Submissions and Associated Responses.

The following table lists a small number of submissions that refer to 3.no themes yet were not of a quantity to require the allocation of a themed response. Instead an individual response is now provided to each submission under the respective themes.

Ref Number/Name	Theme	Response
DNCC-CN 98 Office of Public Works (OPW)	<b>Flooding</b> The OPW and OPR stress that reference should be made to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Acts, and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted. The OPW also requests that full regard is had for the proposed development of flood relief schemes in Carndonagh, Donegal, Dunfanaghy, Killybegs, Letterkenny and Rathmullan, and ongoing design of schemes in Ballybofey/Stranorlar, Buncrana and Luddan, Burnfoot, Castlefin, Carrowkell, Downings, Glenties, Lifford, Ramelton and Raphoe to ensure that zoning proposal support and do not impede progression of these projects, and that a specific objective in this regard is included. Other flood-related context referenced includes climate change, coastal	The requirements of the Flood Risk Management guidelines concerning SFRA and will be comprehensively addressed . To that end, the Authority has initiated a procurement competition to secure the services of competent engineering firms with experience in this area. A SFRA was undertaken for the current CDP and experience and learning from this will be applied to preparation of the new CDP.
DNCC-CN 106 Office of the Planning Regulator (OPR)		
DNCC-CN 83 Dept of Housing, Local Government and Heritage.		

<p><b>DNCC-CN 31</b> <b>Roadstone Ltd</b></p>	<p>change, arterial drainage schemes and lands protected by agricultural embankments.</p>	<p>The submission of Roadstone is noted with regard to the importance of the extractive industries to the wider economy. It is acknowledged that the extractive industries were not referenced in the Issues and Options paper. However the Draft plan will cover this industry within the appropriate chapter including for policies and objectives and the acknowledgement in the submission of Roadstone that the issue is addressed in the current CDP is noted.</p> <p>The comments of the OPR in relation to the Section Guidelines are also noted and the mapping of major deposits will be considered.</p>
<p><b>DNCC-CN</b> <b>106</b> <b>OPR</b></p>	<p><b>Extractive Industries</b></p> <p>Roadstone Ltd. expresses concern that there is no reference to the economic importance and benefits of the quarry and extractive industry. Goes on to submit that the Draft CDP should adequately outline the economic value and significance of the aggregates and minerals sector, building on the approach set out in the current CDP.</p> <p>Roadstone Ltd. also notes that 'extraction can only take place where resources occur and it is therefore tied to certain locations and thus it is important to ensure that the new CDP does not result in the sterilisation of aggregate resources.</p> <p>The OPR refers to the NPF highlighting the key role of the planning process in realising the potential of extractive industries in identifying and protecting important mineral reserves for future use (NPO 23). The Office advises that the new development Plan should identify or map the location of major deposits as advised by the Section 28 Quarries and Ancillary Activities Guidelines for Planning Authorities (2004).</p>	<p>The submission and the guidance documents referenced in the EPA submission are note and all such matters will be considered</p>
<p><b>DNCC-CN 1</b></p>	<p><b>Environmental Protection</b></p>	<p>This submission and the guidance documents referenced in the EPA submission are note and all such matters will be considered</p>

<p><b>Environmental Protection Agency (EPA)</b></p> <p><b>DNCC-CN 38</b></p> <p><b>Derry City &amp; Strabane District Council</b></p>	<p>The EPA submission refers to a wide range of environmental issues and related guidance to be considered during the preparation of the new Plan and the associated environmental reports.</p> <p>DC&amp;SDC note the key issues and trends set out in the Issues and Options Paper. It also identifies the need for consideration of all environmental impacts given the close proximity and visual environmental relationship of the two jurisdictions.</p>	<p>in detail throughout the preparation of the Plan and associated environmental reports.</p> <p>The content of the DC&amp;SDC submission is duly noted and the suggestion to meet in the short term is acknowledged and welcomed. The need for formal transboundary procedures will be an important consideration during the preparation of the new CDP.</p>
<p><b>DNCC-CN 89</b></p> <p><b>Department of the Environment, Climate and Communications (DECC)</b></p>	<p><b>Telecommunications &amp; Broadband</b></p> <p>Telecommunications are identified as critical infrastructure in supporting commercial activities, social inclusion and satisfactory work/life balance, quality of life and enhanced wellbeing.</p> <p>Broadband is described as fundamental and essential infrastructure to support economic growth, and the delivery of the National Broadband Plan is called for, including priority delivery within County Donegal.</p> <p>The DECC refers to broadband communications and notes that Ireland's national and international digital connectivity is critically important to its competitiveness and that an agile responsive and resilient digital infrastructure is needed to support the digital economy. The submission notes National</p>	<p>All comments are noted. These issues should be addressed in detail in the new CDP.</p>

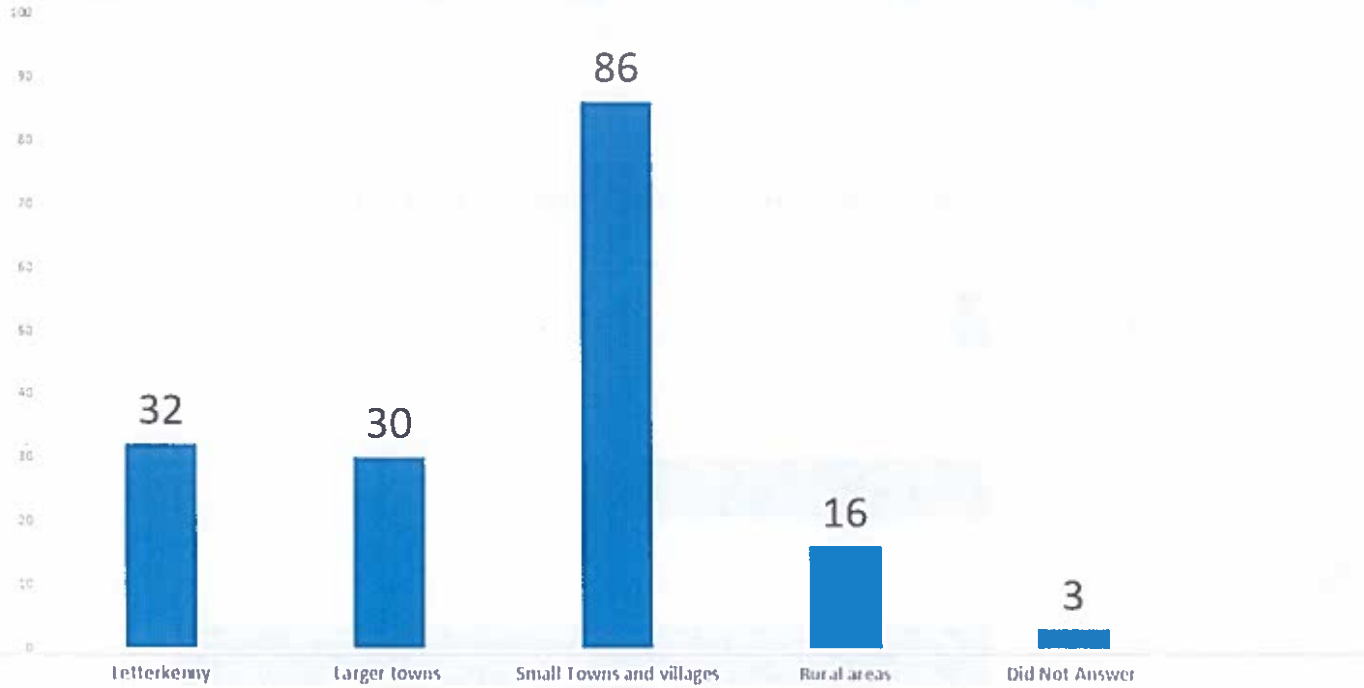
Strategic Objective 6 of the NDP with regard to telecommunications and:

- States that national policy objectives can be further supported by Local Authorities via specific reference in development plans and in particular direct supporting for 5G rollout;
- Encourages a commitment to efficiently process National Broadband Plan (NBP) applications.
- Encourages a commitment to identify suitable urban and suburban locations owned by the state for 5G/small cell deployment.

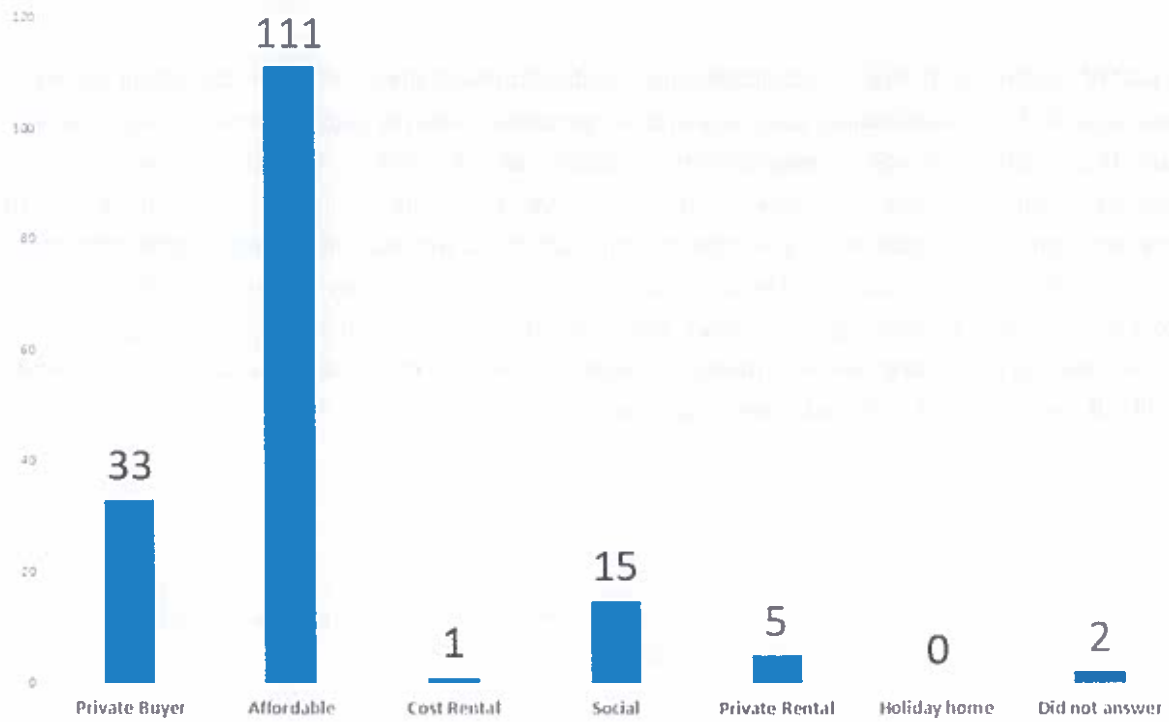
### Section 3.0: Survey Responses

As part of the Pre-Draft Public Consultation for the development plan a short simple online survey was prepared to generate public feedback and better understand the public’s views on key strategic issues (e.g. housing, economic development, transport, heritage, energy, climate tourism). To generate quantifiable data on these key issues this survey asked the public a series of questions with a pre-set number of responses (e.g. Where do you think the is the most important location for new housing in Donegal?). In addition, the public could also provide a written response to different question themes (e.g. housing). The survey was made available through [www.donegaldevplan.ie](http://www.donegaldevplan.ie) and was heavily publicised via social media through the Council’s communication office. The overall results of the survey are outlined in series of graphs below.

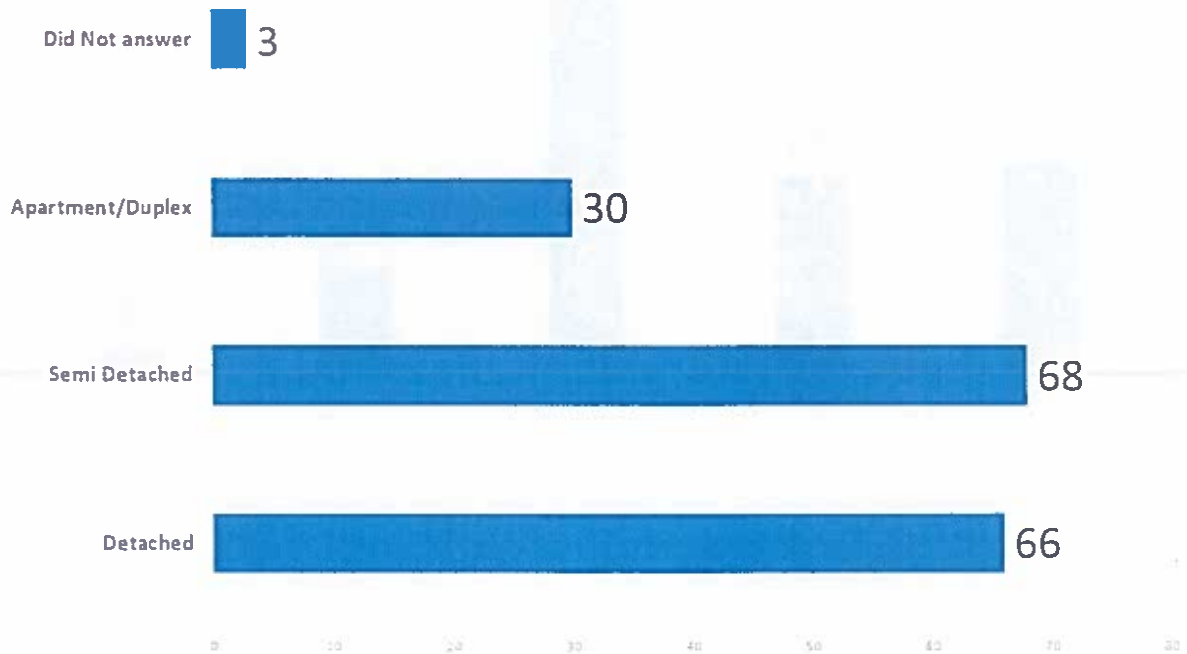
Question 2: Where do you think is the most important location for new housing in Donegal?



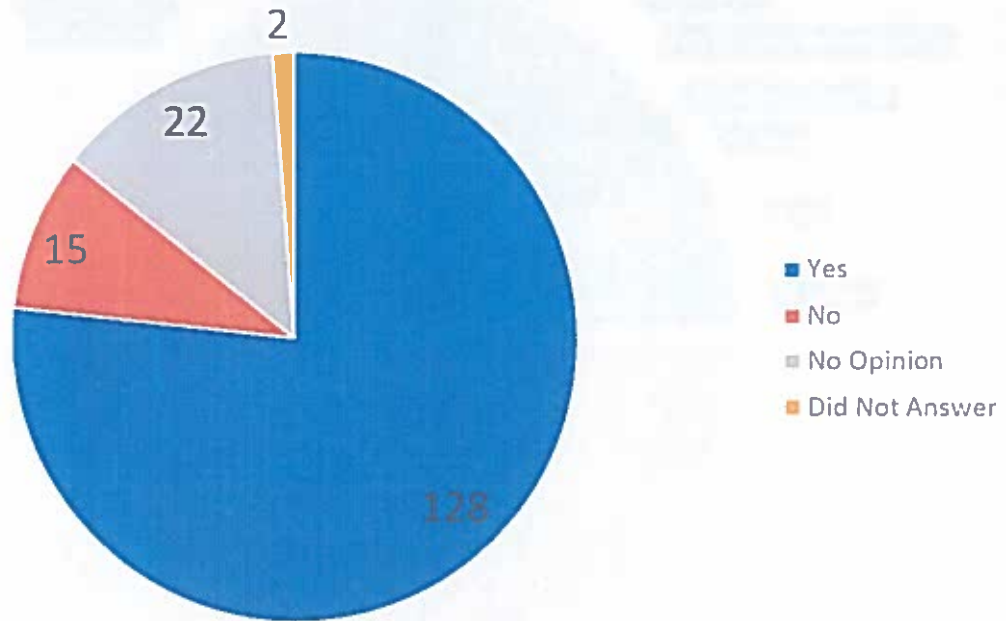
Question 3: What type of housing do you think is most needed?



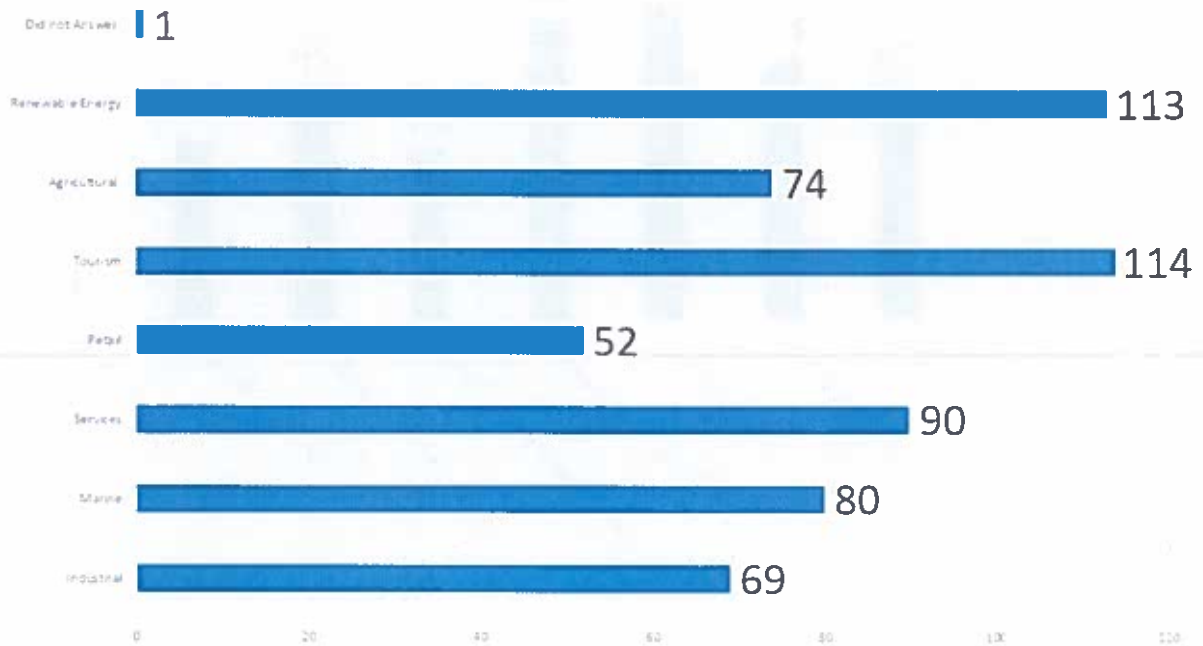
Question 4: What type of housing do you think is most needed?



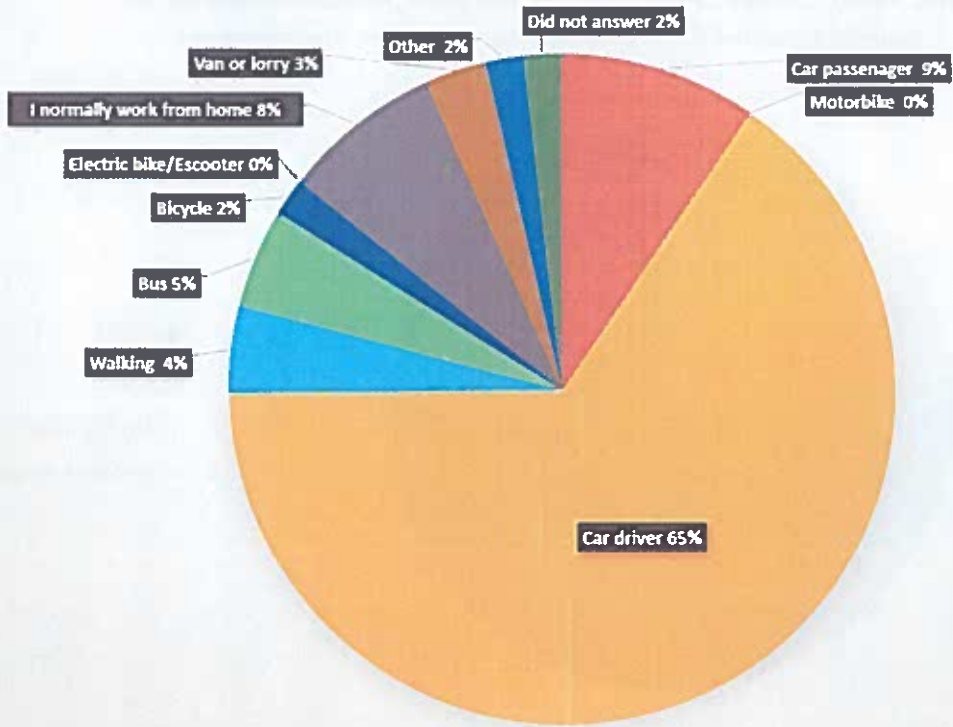
Question 5: Should the Council make serviced sites available for people to build their own homes in towns and villages?



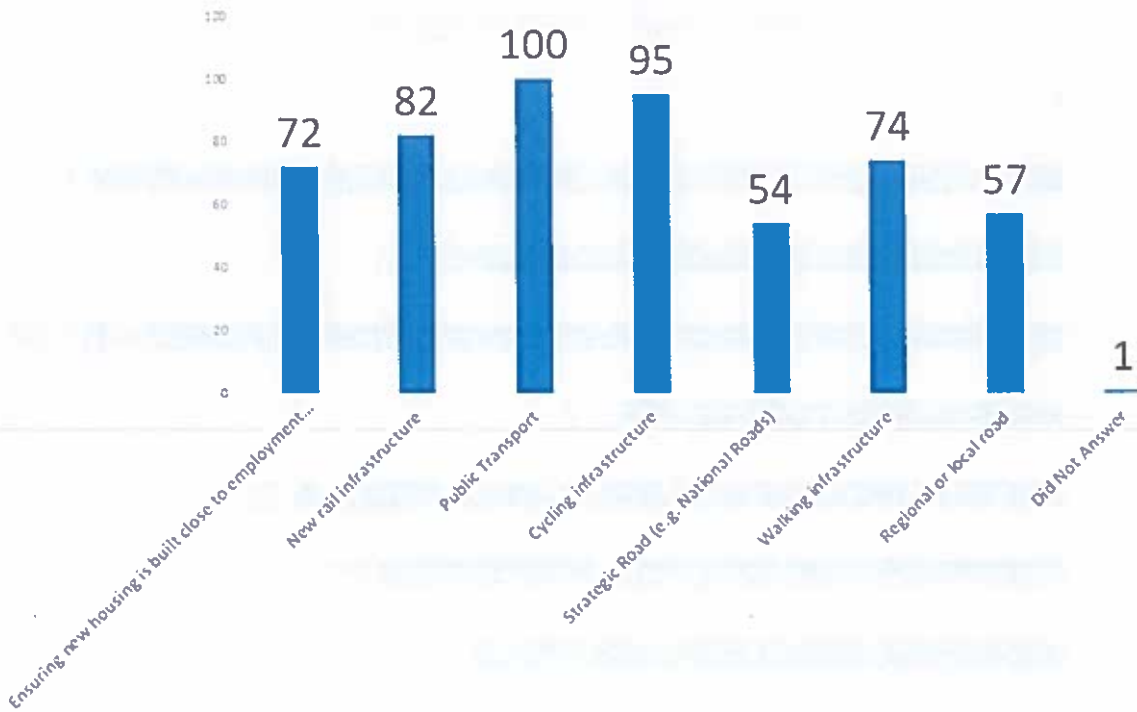
Question 6: What types of economic development is it important for the development plan to support?



Question 7: How do you usually travel to work, school, or college?

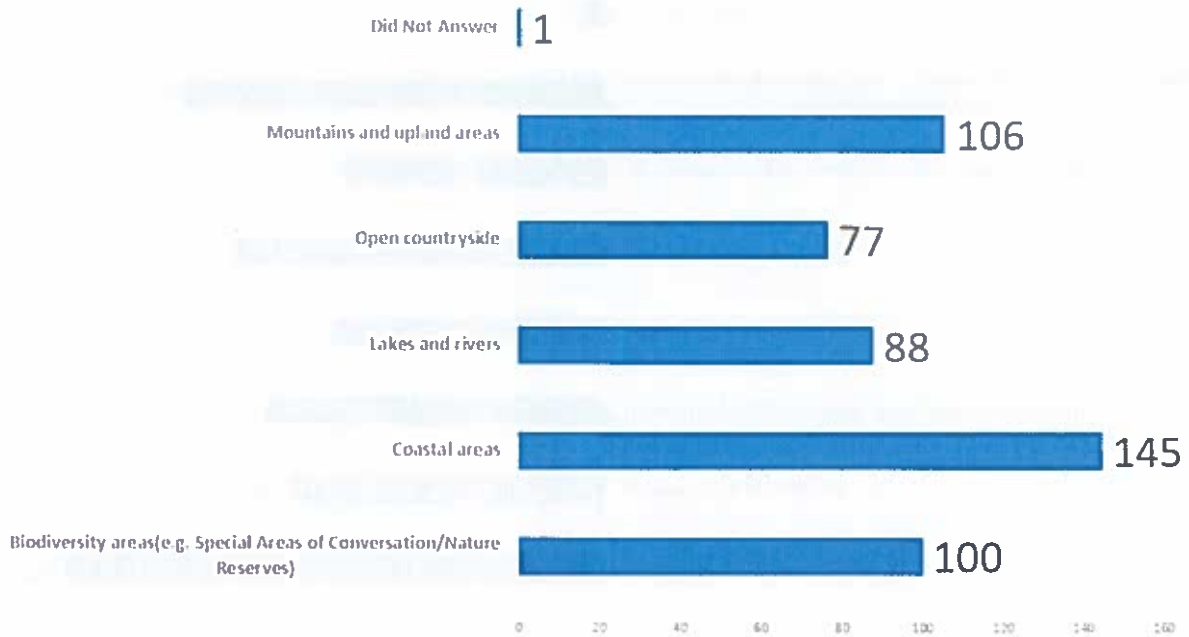


Question 8. What of transport improvements are needed in Donegal?

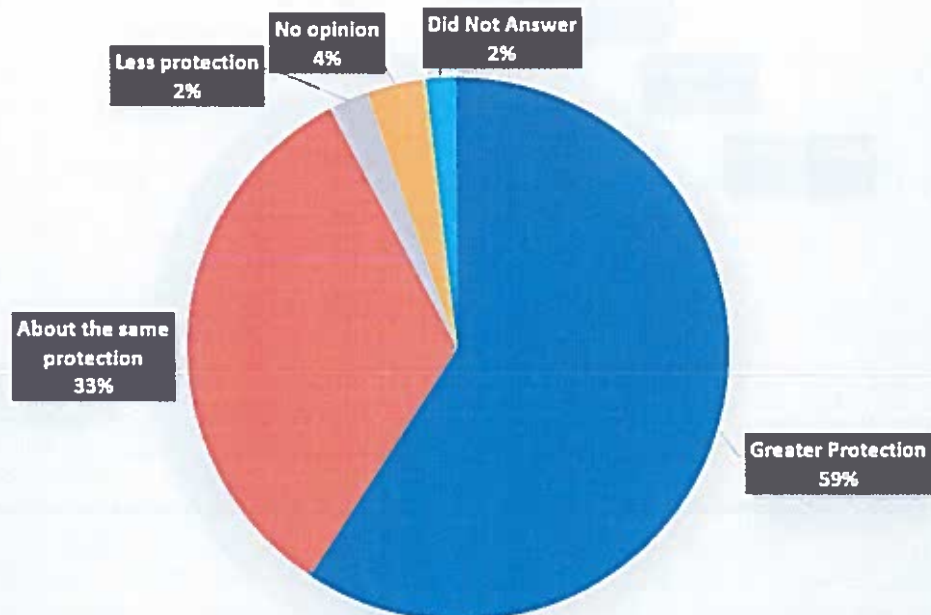




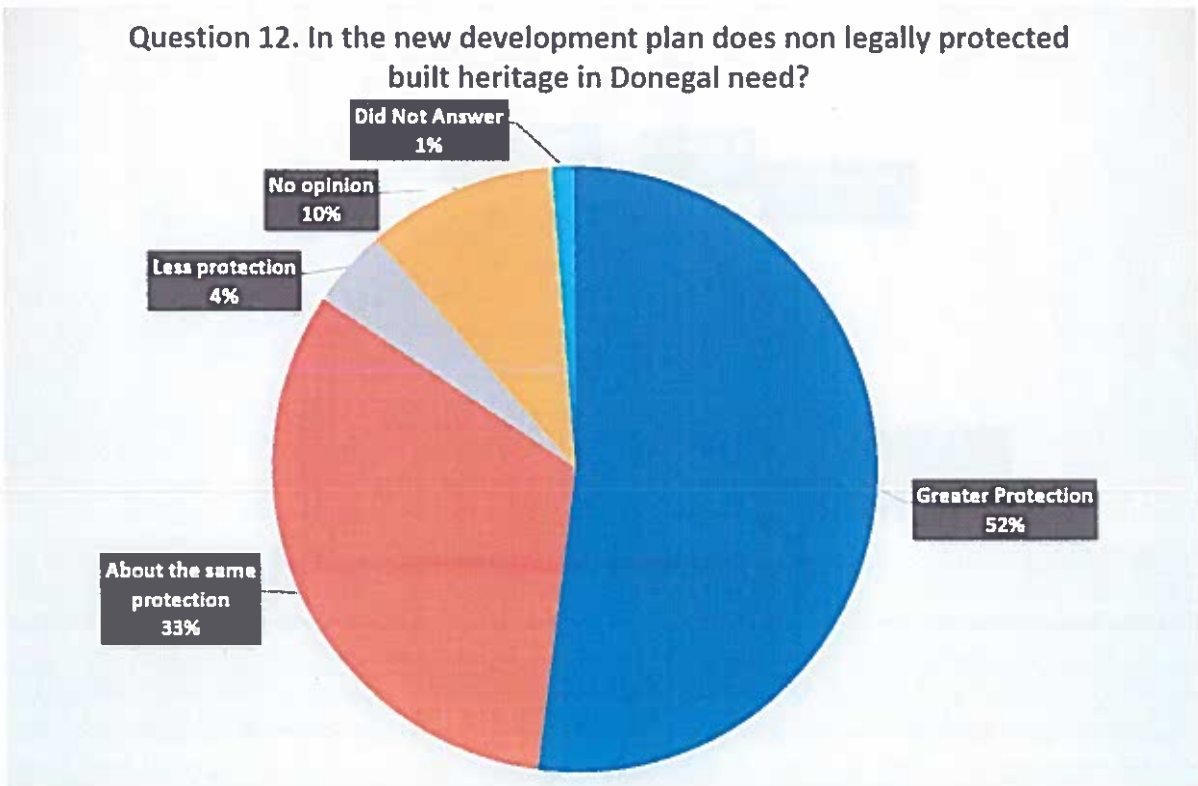
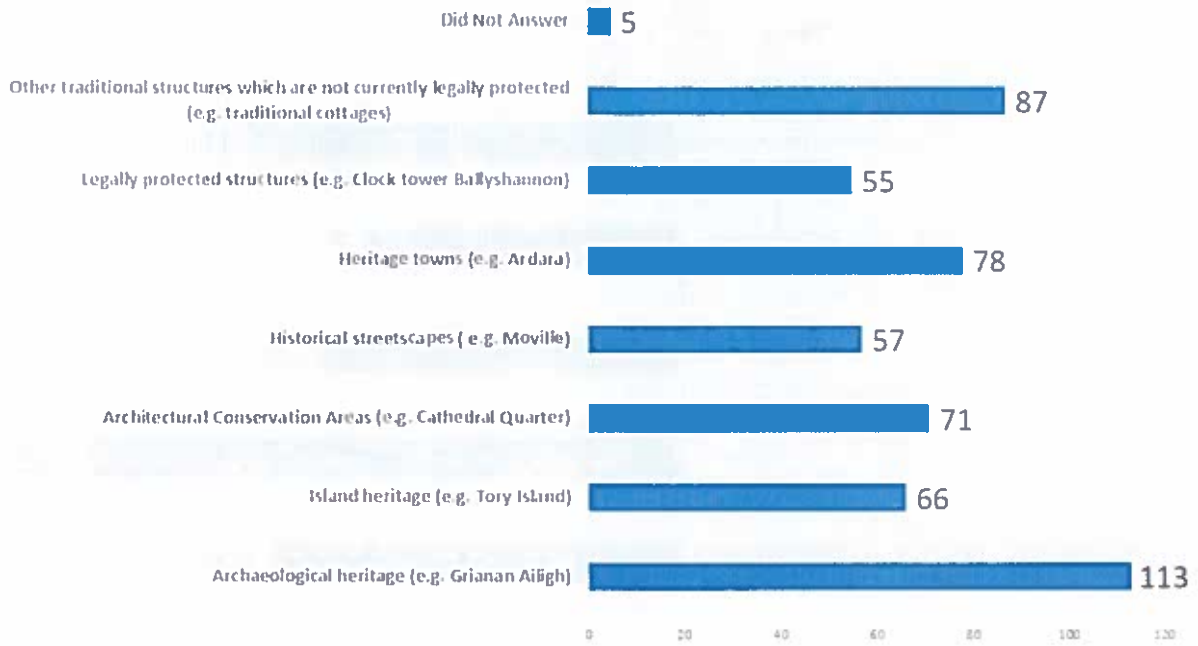
9. What are the most important parts of our natural heritage in Donegal?



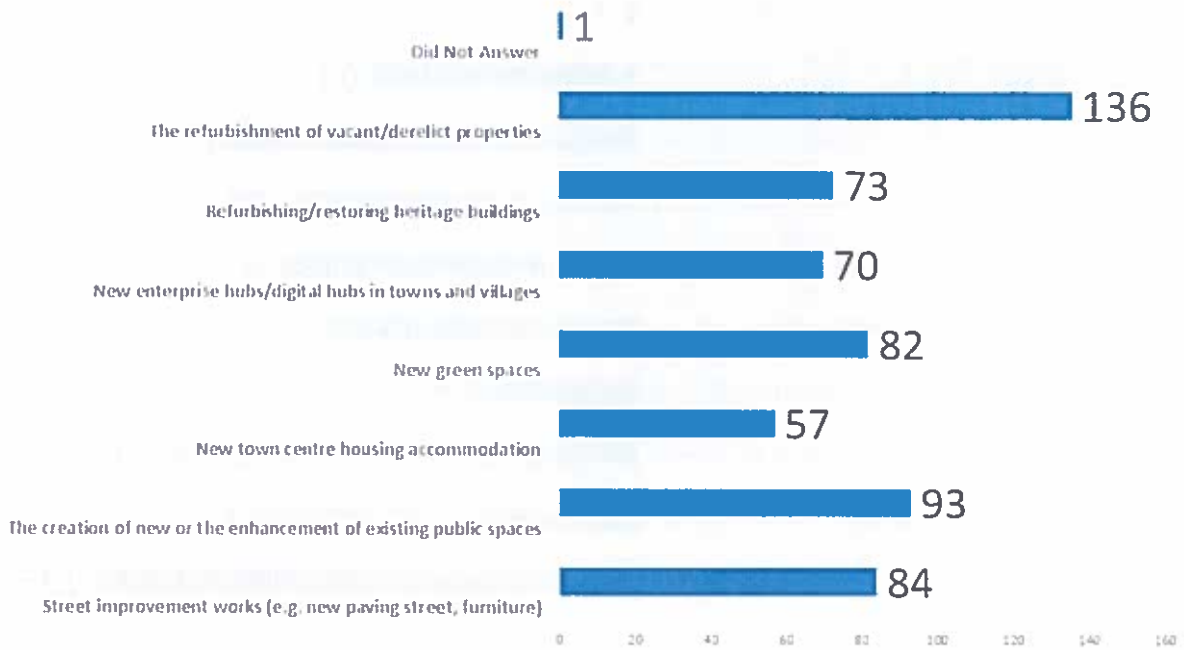
Question 10. In the new development plan does Donegal's natural heritage need?



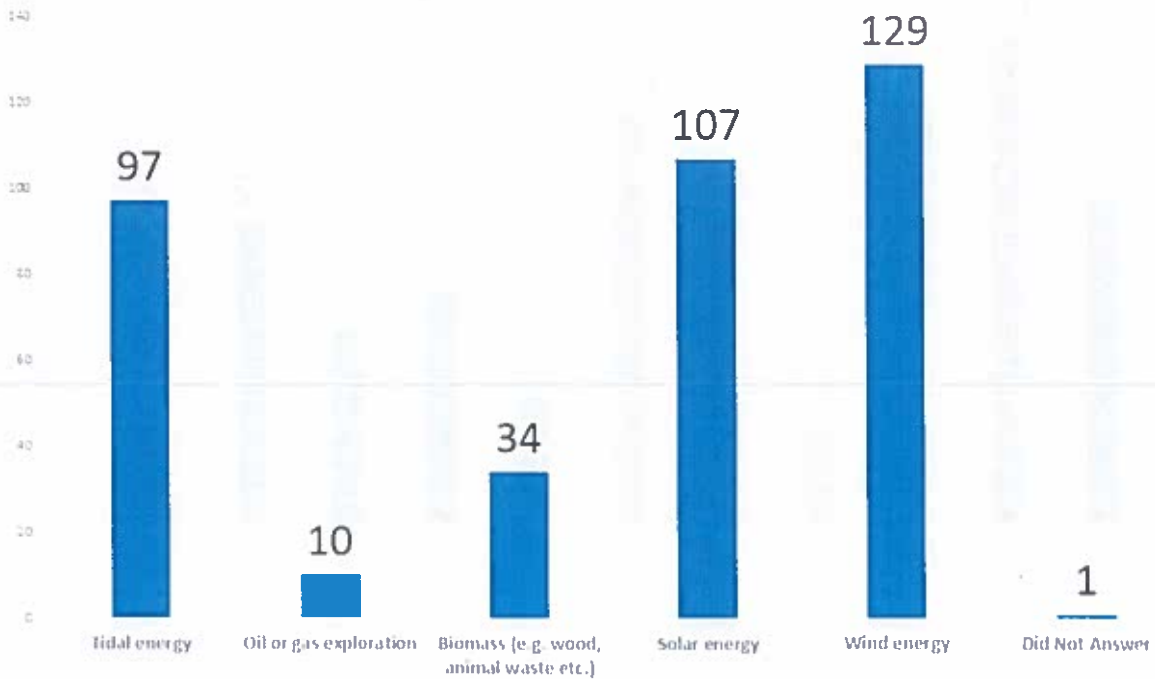
**Question 11. What are the most important parts of Donegal's built heritage?**



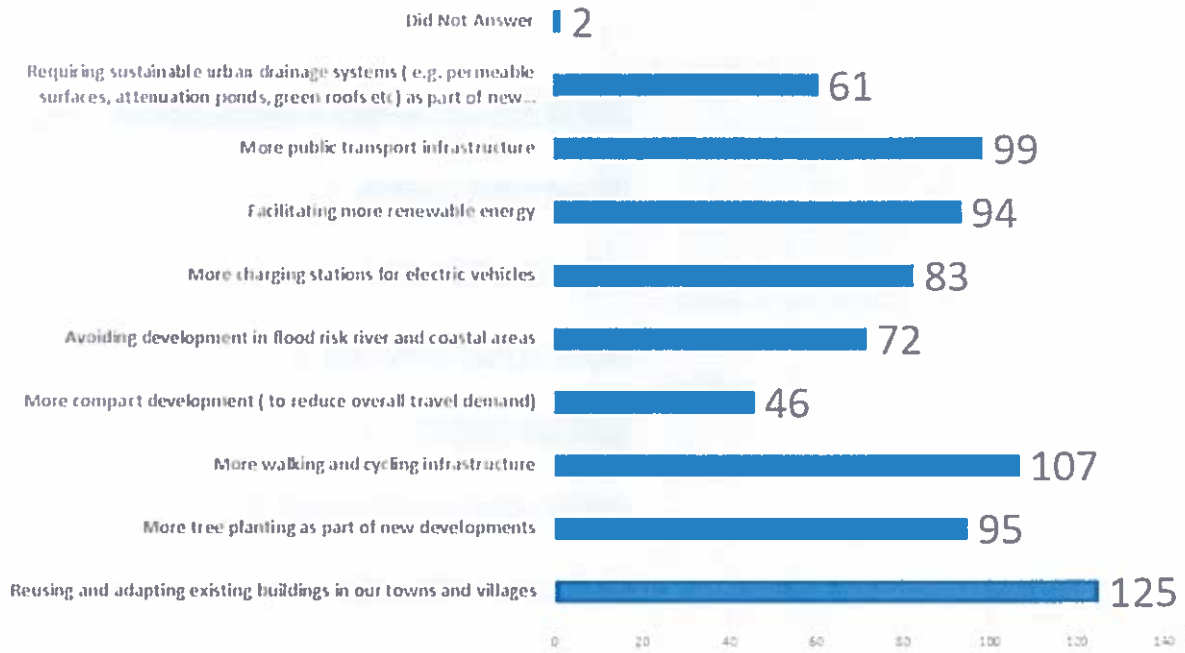
**Question 13. What forms of urban regeneration are needed in Donegal?**



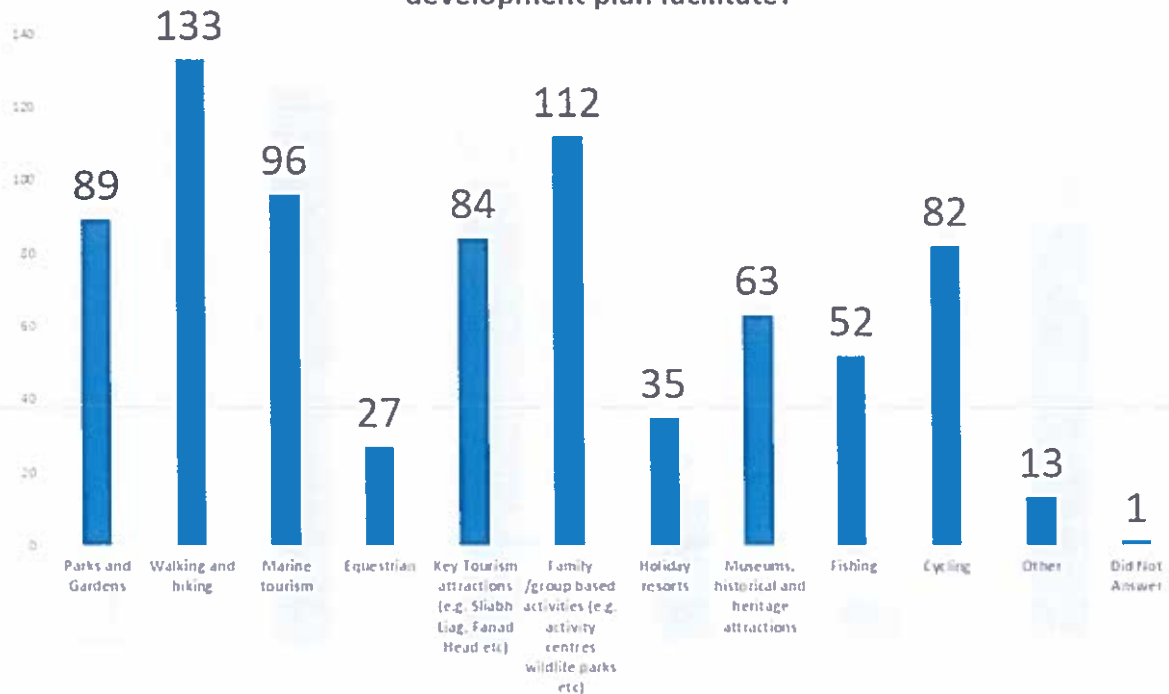
**Question 14. What form of energy is it most important for the plan to facilitate?**



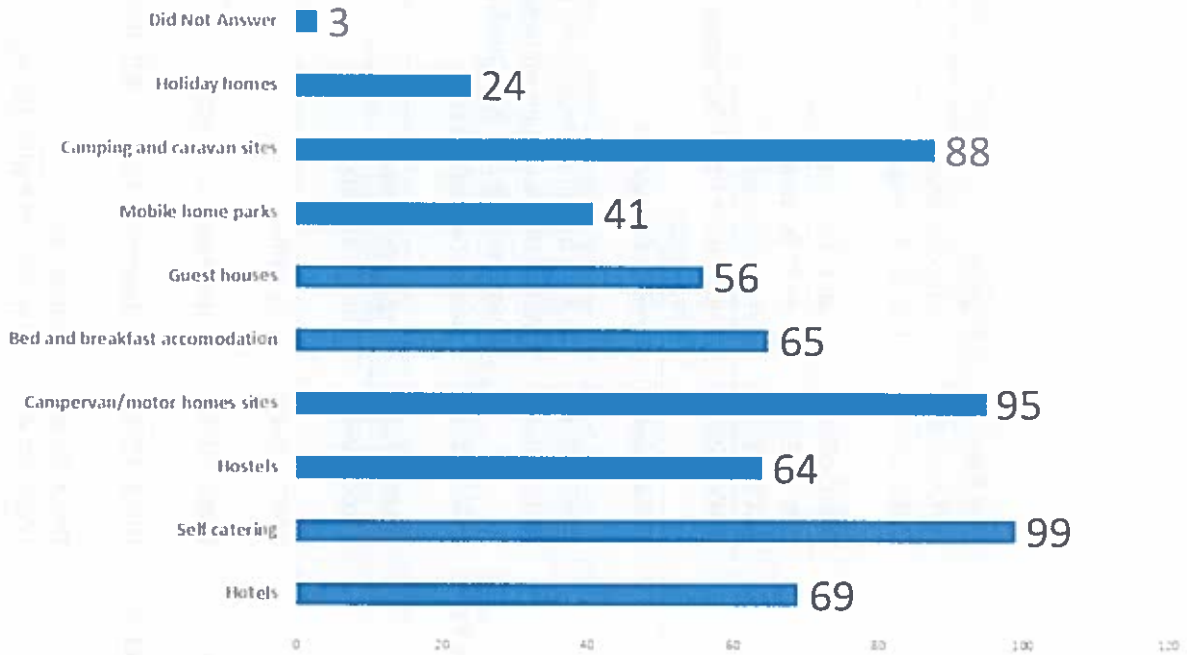
**Question 15. How should the plan help Donegal to mitigate (reduce) and adapt to Climate Change?**



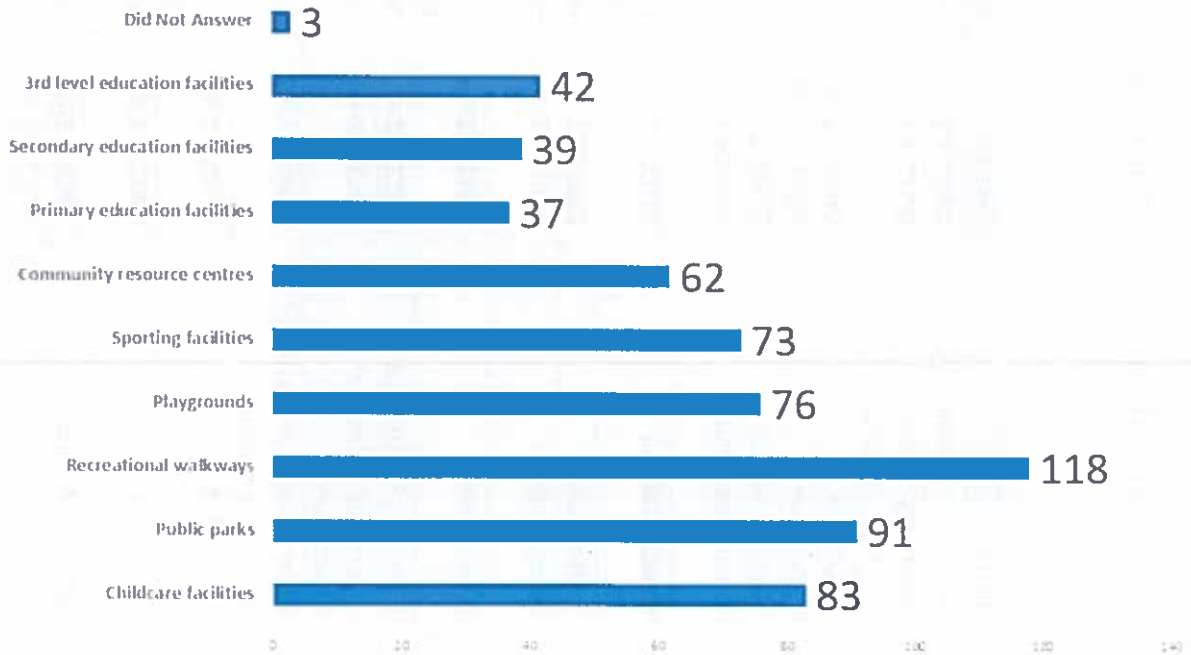
**Question 16. What forms of tourism development should the development plan facilitate?**



**Question 17. What types of tourism accommodation should the plan facilitate?**



**Question 18. What types of community development are most need in Donegal?**



## Appendix A - List of Submissions from Public and Prescribed Bodies

### Public Submissions

Ref No.	Name	Ref No.	Name	Ref No.	Name
DNCC-C2-2	Ronan Group Renewables	DNCC-C2-4	Cllr Nicolas Crossan	DNCC-C2-5	Margo Gorman
DNCC-C2-6	O'Doherty's Keep Development Group	DNCC-C2-8	Eithne O'Sullivan	DNCC-C2-9	Ronald Ferguson
DNCC-C2-10	Val O'Kelly	DNCC-C2-11	Margaret McCullough	DNCC-C2-13	Tom O'Donnell
DNCC-C2-14	Mark Grant	DNCC-C2-15	Breege Galbraith	DNCC-C2-16	Ruth O'Donnell
DNCC-C2-17	Margaret McCullagh	DNCC-C2-18	Una Brown	DNCC-C2-19	Peter McLoughlin
DNCC-C2-22	Ronan O Murchu	DNCC-C2-23	Dara Furey	DNCC-C2-24	Saint John's Point Residents Association
DNCC-C2-26	Brendan Carroll	DNCC-C2-27	Bundoran Community Development CLG	DNCC-C2-28	Ivernia Energy Ltd
DNCC-C2-29	Nicolas North	DNCC-C2-30	Anne Murphy	DNCC-C2-31	SLR on behalf of Roadstone Ltd.
DNCC-C2-32	Ashley Godden	DNCC-C2-33	Sinead Egan	DNCC-C2-34	Máirín Uí Fhearraigh on behalf of Comharchumann na nOileán
DNCC-C2-35	David Barnes	DNCC-C2-36	Professor Alun and Mrs Kate Evans	DNCC-C2-37	Gas Networks Ireland
DNCC-C2-40	Inishowen Rivers Trust	DNCC-C2-41	Bernadette English	DNCC-C2-42	Brónagh Heverin
DNCC-C2-43	Irish Farmers Association - Aquaculture	DNCC-C2-44	Paula Harvey	DNCC-C2-45	The Music Box
DNCC-C2-47	Roger Garland on behalf of Keep Ireland Open	DNCC-C2-48	Fiona Orme	DNCC-C2-49	Guy Hollis
DNCC-C2-50	Noreen Martin	DNCC-C2-51	Local Authority Waters Programme	DNCC-C2-52	Louis and Joan Hanlon
DNCC-C2-54	Una Walsh	DNCC-C2-56	Margaret Fitzgerald and Ian Davis	DNCC-C2-58	Letterkenny Glass – JMP Partnership
DNCC-C2-59	Ailbhe Ó Monacháin	DNCC-C2-60	Patrick McHugh	DNCC-C2-61	Karen Hollis
DNCC-C2-62	An Post	DNCC-C2-63	Barbara Bradby	DNCC-C2-64	Randal and Paddy Hayes

Ref No.	Name	Ref No.	Name	Ref No.	Name
DNCC-C2-65	Stephen McFarland	DNCC-C2-66	Maeve Carr	DNCC-C2-68	Lár Chomhairle Paróiste Ghleann Cholm Cille
DNCC-C2-69	Declan Brennan	DNCC-C2-70	Gravis Planning	DNCC-C2-71	Northern View Leisure Ltd.
DNCC-C2-72	Northern View Leisure Ltd. (Bundoran)	DNCC-C2-74	Sinbad Marine Services	DNCC-C2-75	Dr Fiona Hardy
DNCC-C2-76	Daisy Mules	DNCC-C2-77	Norah Parke on behalf of Killybegs Fishermans Organisation	DNCC-C2-79	Aileen Heverin
DNCC-C2-81	John J Doherty	DNCC-C2-82	Brian Flanagan	DNCC-C2-85	Ronald Ferguson
DNCC-C2-86	Carmel Doherty	DNCC-C2-87	Carmel Doherty	DNCC-C2-88	Greasepaint Productions
DNCC-C2-90	Discover Bundoran	DNCC-C2-91	The Exchange Inishowen	DNCC-C2-92	Gweebarra Conservation Group
DNCC-C2-93	Scott Duncan and Dean Newton	DNCC-C2-94	Agnes Doolan	DNCC-C2-95	Conall Newman on behalf of Mulimosog Wind Ltd.
DNCC-C2-96	Conall Newman on behalf of Gineadoir Gaoithe Teoranta	DNCC-C2-97	Wind Energy Ireland	DNCC-C2-99	Joseph Brennan
DNCC-C2-100	Sile Uí Ghallhoir	DNCC-C2-101	Canavan Associates Ltd.	DNCC-C2-102	Alan McMenamin
DNCC-C2-103	Killybegs Marine Cluster	DNCC-C2-105	Planree Energy Ltd.	DNCC-C2-108	Tobin Consulting Engineers on behalf of Cloghercor Wind Farm Ltd.
DNCC-C2-109	Joseph Brennan	DNCC-C2-110	Sinead O Malley	DNCC-C2-110	Future Energy Ireland
DNCC-C2-112	Enya Alvey	DNCC-C2-113	Noreen Trearty	DNCC-C2-114	Hugo Trearty
DNCC-C2-115	Eugene Trearty	DNCC-C2-116	Coiste Timpeallacht Ghaath Dobhair	DNCC-C2-117	Conradh Na Gaeilge
DNCC-C2-118	Údarás na Gaeltachta	DNCC-C2-119	Cordelia Nic Fhearraigh	DNCC-C2-120	Bettina Bartmann
DNCC-C2-121	Alun Evans	DNCC-C2-122	Bronagh Heverin on behalf of Save Our Beaches	DNCC-C2-124	Barrack Hill Town Park Steering Committee

Prescribed Body Submissions

Ref No.	Name	Ref No.	Name	Ref No.	Name	Ref No.	Name
DNCC-C2-1	Environmental Protection Agency (EPA)	DNCC-C2-3	Department of Agriculture, Food and the Marine	DNCC-C2-7	Inland Fisheries Ireland	DNCC-C2-39	Electricity Supply Board (ESB)
DNCC-C2-25	Transport Infrastructure Ireland (TII)	DNCC-C2-38	Derry City & Strabane District Council	DNCC-C2-57	National Transport Authority (NTA)	DNCC-C2-83	Department of Housing, Local Government and Heritage
DNCC-C2-46	Irish Water	DNCC-C2-55	Dublin Airport Authority (daa)	DNCC-C2-98	Office of Public Works (OPW)	DNCC-C2-107	Northern & Western Regional Assembly (NWRA)
DNCC-C2-78	Fáilte Ireland	DNCC-C2-80	Fermanagh & Omagh District Council				
DNCC-C2-84	Department of Education	DNCC-C2-89	Department of Environment, Climate and Communications				
DNCC-C2-104	The Arts Council	DNCC-C2-106	Office of the Planning Regulator (OPR)				
DNCC-C2-111	EirGrid	DNCC-C2-123	Department of Agriculture and Rural Affairs (NI)				



## Appendix B – Bodies Consulted by the Planning Authority in accordance with Section 11(2) of the Planning and Development Act 2000 (as amended)

1	The Minister for Housing, Local Government and Heritage
2	The Minister for the Environment, Climate and Communications
3	The Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media
4	The Minister for Education
5	The Minister for Agriculture, Food and the Marine
6	The Minister for Enterprise, Trade and Employment
7	The Minister for Transport
8	The Office of the Planning Regulator
9	An Bord Pleanála
10	Northern and Western Regional Assembly
11	Donegal Local Community and Development Committee
12	Leitrim County Council
13	Sligo County Council
14	Derry City & Strabane District Council
15	Fermanagh & Omagh District Council
16	Causeway Coast and Glens Borough Council
17	The Department for Infrastructure Northern Ireland
18	Northern Ireland Environment Agency
19	Environmental Protection Agency
20	Planning System and Spatial Policy Section, Department of the Housing, Local Government and Heritage
21	OPW
22	The Heritage Council
23	An Taisce
24	Irish Aviation Authority
25	TII
26	Fáilte Ireland
27	An Chomhairle Éalaíon
28	ESB
29	Health Service Executive
30	Health and Safety Authority
31	Inland Fisheries Ireland
32	Loughs Agency
33	NPWS
34	Irish Water
35	Eirgrid

