



Donegal County Council
County House
Lifford
Donegal
F93Y622

3 June 2022

via email: donegaldevplan@donegalcoco.ie

RE: REVIEW EXISTING DONEGAL COUNTY DEVELOPMENT PLAN (2018-2024) AND PREPARE NEW COUNTY DEVELOPMENT PLAN (2024-2030)

A Chara,

I refer to notification dated Friday 8 April 2022 of the review to the existing Donegal County Development Plan (2018-2024) and the intention to prepare a new County Development Plan (2024-2030) and that Issues Papers had been published as part of the Pre-Draft Public Consultation in respect of the proposed Donegal County Development Plan 2024 – 2030.

The publication of the Pre-Draft Consultation (Issues Papers) is welcome as it commences the process of a new Development Plan for County Donegal, which will put in place a framework for growth over the plan period. A Variation has not been made, as required under Section 11(1)(b) of the Planning and Development Act 2000 (as amended), to incorporate the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). However, this review of the CDP 2018-2024 presents an opportunity to incorporate same.

The new plan will be critical in shaping the medium-term future of County Donegal, and dealing with numerous critical matters, including:

- Helping to accelerate the growth and expansion of the Main Urban Centre's in Donegal. The RSES identifies as a Central theme the weak urban structure of the Northern & Western Region, and the need to bring critical mass to Towns such as Letterkenny to serve as Regional drivers for a wider Sub Region.
- Bringing detail to the ambition of the North-West City Region (as per Section 9 of the RSES), including any projects associated with the Shared Island initiative.
- Achieving effective Urban growth in Letterkenny, growing the County's other key settlements together with a continuation of placemaking enhancements.
- Climate Action measures, including modal shift in transport where possible.
- Proportioning a greater share of new residential units to Towns and Villages.
- Delivering overdue enabling infrastructure such as the Donegal Ten-T projects.
- Dealing with the significant disruption of MICA defective houses, and the consequential effects which flow from the thousands of houses to be rebuilt.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon

Tionól Réigiúnach an tUaiscirt agus an Iarthair
An Chearnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie

It is worth acknowledging and building upon the successes recently secured by Donegal County Council's Regeneration Team in the realm of URDF & RRDF projects, together with other commitments via other development bodies, including Failte Ireland (Fort Dunree), and Udaras Na Gaeltachta. The projects for Letterkenny (Town Centre Masterplan, ESB Lands / Alpha Innovation Centre), Ballybofey (SEED Project), Ballyshannon (Regeneration) Buncrana (Shore Front Enhancement) as well as those in West Donegal (Burtonport Harbour, GTeic Goath Dobhair) will assist in delivering on the aims of the NPF, as well as the RSES.

The Draft Development Plan Guidelines (DHPLG, Aug 2021) now provide additional direction to Local Authorities in respect of Development Plan preparation, and Core Strategy formulation. Key processes now include (i) Long Term Strategic Development Sites and (ii) an analysis of already zoned land as well as extant permissions (Sec. 4.4.1 & 4.4.2 refers). One of the central areas of focus of the Draft Guidelines refers to Core Strategy options, including evaluation of baseline data (Sec.3.3.1). In the absence of the Census 2022 results, there is some (albeit limited) commentary contained in the Issues Papers around Housing Data and the Share of Housing Completions in the context of Urban / Rural share. There is also a clear acknowledgement that Urban Housing supply has in recent years been seriously lacking, and this is a problem replicated across the region, and the State. Indeed, the Issues Papers note there has been a significant shortfall in housing completions in the County's main towns, the consequence of which is that Core Strategy targets within the existing plan are likely to highlight a major undersupply of housing units.

Additionally, the Draft Development Plan Guidelines (Sec 2.2) outline a detailed inventory of the necessary relevant staff a Local Authority should have within a Development Plan Team, and this is something Donegal County Council may wish to examine.

Comments on the Key Draft Development Plan Issues

The new Donegal CDP will have to align with the RSES, and set out below are some of the key elements which the Regional Assembly would highlight at this early stage as being of particular importance for the forthcoming plan:

Core Strategy

- The issues paper indicates that the RSES, among other documents, will serve as the framework to guide the new Plan. This is welcome, and the Core Strategy terminology should reflect that of Regional Policy, with Letterkenny as a Regional Growth Centre, and the remainder of the settlement hierarchy following thereafter.
- The Plan should identify and clearly set out a programme for the provision of serviced sites within smaller Towns & Villages, and that this initiative is to be led by Donegal County Council, as per RPO 3.7 of the RSES.
- The Plan should contain an instrument which seeks to encourage the reuse of derelict / disused rural buildings. RPO 3.3 within the RSES sets a target of 20% in this regard, and there are a variety of methods for the measurement of such a policy. Brownfield sites have been defined within the RSES.
- The current plan is configured in a manner which effectively affords 7 Settlements similar or equal status in terms of the Settlement Hierarchy. Such an approach may benefit from a revision in order to bring more effective structure to the County settlement table hierarchy overall, as well as to better reflect the comparative growth ambitions of the larger settlements such as Buncrana & Ballybofey – Stranorlar.

NW City Region & Letterkenny Regional Growth Centre

- **NW City Region – MASP:** The Donegal CDP offers an opportunity to further develop and amplify the MASP framework for the NW City Region. The MASP concept for the 5 cities is central to Urban Centric growth within the NPF and the RSES, acting as a crucial conduit for investment, and the prioritisation of critically enabling infrastructure. The Issues Papers do not elaborate upon this proposition, but the Assembly do note that consideration is to be given on the question of maximising the economic potential of the NW City Region.
- **Letterkenny RGCSP & Boundary:** The forthcoming Letterkenny Draft Local Area Plan will be the framework within which the growth of the Town will be detailed. It is important to signpost that the boundary for the Letterkenny Regional Growth Centre Plan within the RSES includes a defined boundary, and this will need to be replicated in the CDP. The Assembly would advocate integrating the elements of the Letterkenny Regional Growth Centre Strategic Plan, contained at Section 3.7(b) of the RSES.
- **Project Funding:** It is noted by the Assembly that ongoing Project work by Donegal County Council, via the RRDF & URDF mechanism, have placed Letterkenny in an encouraging position in relation to the enhancement of Placemaking and Regeneration across the Public Realm, as well as tackling issues such as vacancy and dereliction.
- **Housing Supply Shortfall:** The Assembly note recent emerging information (May 2022), which appears to illustrate a worryingly low level of ongoing housing construction projects (317 units from 2018 – 2021), and completions in Letterkenny, and the need to significantly increase the output of housing in Letterkenny to enable the ambitions of RPO 3.7.23 (3,000 – 4,000 new houses) and RPO 3.7.20 (pop. of 27,000 by 2040). Any measures to ramp up output which the Council can instigate would be welcomed, and these steps should generally follow sequential principles, utilising available investment in existing supporting infrastructure as well as an ongoing commitment to Compact Growth.
- **Economic / Employment Ambition:** The Letterkenny RGCSP sets out the ratio of jobs to population growth ambition of 1:2 as per the NPF, and this should be taken into account when examining the quantum of strategic land / opportunity sites.
- **Other matters:** The already undertaken preparatory / survey work, and the completion of the Local Transport Plan for Letterkenny should be utilised to inform land use policy decisions (refers: RPO 6.27). The incorporation of a Town Centre Living Scheme and Building Heights Study (RPOs 3.7.25 & 3.7.27) for Letterkenny is necessary.

The Gaeltacht, the Islands & West Donegal: West Donegal, together with Rossguill and Fanad, have over recent decades experienced ongoing decline in their population. The West of the County has suffered from a lack of critically enabling investment, and the decline of traditional industries have accelerated this decline, which mirrors a decline overall in the number of Irish speakers in Gaeltacht communities. Recently Udaras Na Gaeltachta, has published a new Gaeltacht Strategy aimed at delivering economic growth combined with Language Plans for communities across the County. This is a welcome step and its scope is detailed in the RSES (RPOs 5.8 – 5.12) alongside other measures around the future health of Gaeltacht communities. However, additional measures may be considered beneficial for Gaioth Dobhair and the Rosses, with a particular focus of urban placemaking of potential value.

Transport (including Modal Shift) & Climate Action

Road Network: In the area of transport, Donegal as a County remains distinctly disadvantaged when compared nationally. This is recognised in the NPF, with an ambition to improve connections to the NW of Ireland, including the long overdue A-5 Transport Corridor. Integral to enhancing Regional

Northern and Western Regional Assembly
The Square, Ballaghaderreen, Co Roscommon

 +353 (0)94 986 2970  +353 (0)94 986 2973  info@nwra.ie

Connectivity is the Donegal Ten T Route Improvement project(s) which will bypass Ballybofey / Stranorlar, and incorporate other key upgrades, including the N-14 upgrade and associated Bonagee Link, which reduce intra urban journey times across the North West. The Assembly recognise significant work is ongoing by Donegal County Council to advance all elements of the scheme, and RPO 6.7 reflects its importance at a Regional level.

In the continued absence of a Rail network, the N-56 is a vital artery for much of County Donegal. TII / DCC are currently completing upgrades along sections of the N-56 (Dungloe to Glenties & Mountcharles – Inver) and these schemes are welcome, however, there are significant stretches of the N-56 which may need to be considered for improvement over the next decade. These enhancement schemes should incorporate active travel elements (cycleways) alongside the carriageways. Certain sections of the N-56 (Kilmacrenan – Creeslough – Falcarragh / Inver – Killybegs / Falcarragh – Dungloe) merit assessment in this regard.

Local Transport Plans (LTPs) (RPO 6.27) for Donegal Town, and other settlements within the hierarchy, as may be determined necessary will assist in the identification of active travel opportunities, which offer people attractive alternatives.

Rail: The Assembly recently prepared a submission on the All Island Rail Review (available via this link <https://www.nwra.ie/publications/>), which outlines the Region’s Rail priorities. The priorities are reflected in a series of ‘Regional Asks’, including the need to connect Letterkenny to the Rail Network (as it is an outlier, and the only City / Regional Growth Centre designated in the NPF not currently served by rail). The new County Plan should reflect upon this ambition, and specifically elaborate upon RPO 6.16, and how this can be achieved.

Marine: The role and potential diversification of Killybegs Port is also worthy of examination within the context of the new plan. A review of Ireland’s Port Strategy is imminent, and the Western Seaboard (with the exception of Foynes) does not boast a Port with status above Regional. The continued uncertainty surrounding post Brexit Trading arrangements will be a key consideration in the Port Strategy review, and in this respect, there may be an opportunity to expand the Harbour infrastructure and overall role of Killybegs in particular, as well as Greencastle and its Marine Innovation Centre. (Refers: RPO 4.31 & RPO 4.34). The RSES outlines the ambition to examine the feasibility of pursuing European Ten-T Comprehensive Port status for Killybegs as a Port (Pg 216), and such a designation could have wider benefits, inclusive of new funding stream possibilities. The review should consider how this can be achieved.

Modal Shift: The new Plan should (in addition to the measures included on the aforementioned road schemes) clearly chart measures to achieve modal shift, and this may incorporate detail in respect of Greenway projects, and timeline for their delivery, including those identified in the RSES (Refer: Section 5.8).

Other Climate Action measures

- The Climate Action ambitions within the RSES are cross cutting, and extend from a commitment to compact growth, to a low Carbon Region which is a leader in onshore, and potentially offshore Renewable Energy, as well as other sectors, including the Bio Economy. The new Plan should give effect to the ambitions on potential Bio-Refining Hubs (RPO’s 4.27 – 4.29). The Assembly note this is referenced in the Economic Development section of the Issues Papers.

Northern and Western Regional Assembly
The Square, Ballaghaderreen, Co Roscommon

 +353 (0)94 986 2970  +353 (0)94 986 2973  info@nwra.ie

- Recently, the Department of Transport has published the Governments National Sustainable Mobility Policy (April 2022), and it is worth noting that an inbuilt aim therein is that the NTA will assist in the analysis of development land and prioritise identifying that which is within 1km of public transport networks. The wider aims of this Policy Framework should be factored into landuse decisions in the Plan.
- The identification of a Decarbonizing Zone within County Donegal is required under the Climate Action Plan 2021, Sec.10.2, and the County Development Plan should give effect to this ambition.
- The Assembly note the recently published Wind Energy Framework Variation on the current CDP and have separately commented upon same. This plan will need to incorporate policy in respect of renewable energy, including wind energy.

Additional Considerations

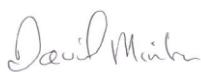
To achieve a shared vision for the Region, the RSES places a strong emphasis on the need to strengthen our Digital Networks, to enable emerging technologies work to ensure policies / systems are in place to aid the transition to a digitally connected world. RPO 6.36 – 6.60 involve the promotion of Smart places. This is particularly relevant in the context of the work underway by ERNACT, and the forthcoming opportunities associated with PEACE Plus (SEUPB). The Issues Paper does not appear to include any reference to Smart initiatives. Smart Region initiatives have the capacity to influence other policies and programmes, including the forthcoming County Donegal LECP when reviewed.

The Plan should also consider the following matters:

- Section 4.4 of the RSES on Tourism, which details Failte Ireland’s ambition for the Wild Atlantic Way, and its Destination Towns (Donegal Town & Letterkenny), where there may be a need to assess overall bed-night capacity, with the return to stable growth of the tourism sector post-pandemic.
- The opportunities for the growth of the County with the elevation of LYIT, which now forms part of the Atlantic Technological University RPO 6.4 – Smart Ports
- RPO 7.1 – 7.6 Education / Skills – including support for the Atlantic Tech. University
- RPO 7.8 Slainte Care
- RPO 7.11 Healthy Ireland
- RPO 7.14 Specific Zoning for Nursing Homes / Sheltered / Temporary Housing, particularly important given the MICA crisis
- RPO 8.2 Support Electricity Transmission Projects in Donegal
- RPO 8.8 (Connacht Ulster Region Waste Management Plan, CURWNP)
- RPO 8.15 & RPO 8.17 – Water Infrastructure Projects

I trust that the above comments are of assistance at this initial stage of the review process. The Assembly wish to thank the Council for the opportunity given to engage in the process. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas,



David Minton
Director

Northern and Western Regional Assembly
The Square, Ballaghaderreen, Co Roscommon

 +353 (0)94 986 2970  +353 (0)94 986 2973  info@nwra.ie