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The Central Planning Unit  
Donegal County Council  
County House  
Lifford  
F93 Y622

17 February 2023

via email: [letterkennyplan@donegalcoco.ie](mailto:letterkennyplan@donegalcoco.ie)

## **RE: THE DRAFT LETTERKENNY PLAN AND LOCAL TRANSPORT PLAN 2023–2029**

A Chara

I refer to your notification on 5 January 2023 of the Draft Letterkenny Plan and Local Transport Plan 2023-2029. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

The draft LAP confirms that the purpose of the LAP is to replace Chapter 12 (Part C) of the County Donegal Development Plan which relates to Letterkenny and it further confirms the intention to delete Chapter 12 of the County Development Plan by making a Variation to the Plan – that variation process is independent of this LAP process and it has not been initiated at this time. The Assembly wish to make comment on the process being followed initially before focusing upon the LAP content.

### **Process**

The National Planning Framework (NPF) was published in 2018 and the Regional Spatial and Economic Strategy for the Northern & Western Region (RSES) was subsequently made in January 2020. Thereafter, as required under the Planning and Development Act 2000 (as amended), all County and City Development Plans were required to initiate a review or a variation, within timeframes specified in the Planning and Development Act 2000 as amended (the Act). The review/variation process for the County Donegal Development Plan (CDP) should have commenced by mid-2020, but the process was not initiated within the time limits, as required. In April 2022, Donegal County Council gave notice of a Development Plan Review and the NWRA made a submission to it. The next step in that process will be the publication of a Draft County Development Plan.

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The Northern and Western Region advocated strongly for the NPF to include the designation of Letterkenny/Derry/Strabane as the 'North West City Region' and for Letterkenny, Sligo and Athlone to be designated as Regional Growth Centres – to address the weak urban structure through targeted growth and investment in infrastructure in those places. The RSES then built upon this success through the incorporation of a Metropolitan Area Strategic Framework for the North West City Region (Chapter 9) and through the inclusion of Regional Growth Centre Strategic Plans for Letterkenny, Sligo and Athlone (Chapter 3) – which signalled to government the growth ambitions and investment priorities for the Regional Growth Centres. These policy frameworks help strengthen the position of local authorities to bid for various funding initiatives to deliver upon the identified investment priorities.

It is critical that the local planning policy and development frameworks build upon these strategic policy frameworks in a consistent manner, so that the government principle of 'funds follow policy' can be realised for Donegal – it is also a requirement of the Act that consistency is achieved. At this stage all other local authorities have completed the variation/review of their development plans, to make them consistent with the NPF and RSES. When the proposed review of the County Donegal Development Plan is complete and the new CDP is adopted, it will provide for a complete suite of development plans across the region that are consistent with the RSES and NPF.

However, the making of the Letterkenny LAP, in the absence of alignment of the County Donegal Development Plan with the NPF and RSES, presents a complexity that has not been encountered elsewhere in the region. The achievement of consistency of the LAP with the County Development Plan, the RSES, and the NPF will be challenging in these circumstances. Furthermore, the proposal by Donegal County Council to adopt a LAP that replaces Chapter 12, Part C of the County Development Plan and at the same time deletes the said Section 12, by way of the separate Variation process, is somewhat unique and will present its own set of challenges; these being two independent processes that have different timelines – upon adoption a Variation has immediate effect, whilst an LAP will not come into effect until a period 6 weeks after it is made and this may give rise to a policy gap for a period of time, which should be avoided.

The legal and logistical implications of the above is something that the Assembly highlight as critical issues that should be considered further. The preferable approach may be to vary/amend the CDP and then proceed to prepare the LAP for Letterkenny, or, as an alternative, the Variation that is referenced as being 'intended' (Rf. Chapter 1,1 of LAP), could be advanced at this stage to replace Chapter 12 of the CDP using the provisions of this draft plan, and include amendments arising from this consultation to inform it, together with any other amendments required to the Core Strategy etc. that may be needed to refresh the County Development Plan. This would have the advantage of making the County Development Plan consistent with the RSES at the same time as providing a policy framework for Letterkenny. To put it another way, what is being suggested, as an option, is to adopt the Letterkenny Plan as a variation to the County Development Plan and include in

that variation those policy amendments to the County Development Plan that are also necessary to make it consistent with the NPF and RSES.

I now wish to focus on the detail/content of the LAP.

### **The Draft LAP - in Focus**

The Draft Letterkenny Plan and Local Transport Plan 2023-2029 is accompanied by the following reports:

- Environmental Report
- Natura Impact Report
- Strategic Flood Risk Assessment
- Traffic Modelling Report

Given that there are 22 Chapters in the Plan itself, with additional extensive material across the aforementioned suite of accompanying documents, this submission will not comment on each element of the Plan, but rather comment via a number of headings which are most relevant to the growth of Letterkenny as a Regional Growth Centre. They are:

- Overarching Comments, including North West City Region & Plan Boundary considerations.
- Context and Vision for Letterkenny – focus on Core Strategy / Evidence Base.
- Compact Residential Growth
- Public Realm, Town Centre
- Employment Growth
- Critical Infrastructure & Local Transport Plan
- Other Considerations.

### **Overarching Comments:**

The Assembly acknowledge and complement the planning authority on the establishment of the online portal to facilitate public participation, as well as enabling written and digital submissions. The availability of an interactive map that enables the user to view and browse layers of detail in the land-use zoning map is innovative and to be commended.

The Assembly commend Donegal County Council on the publication of the Draft Letterkenny LAP. This Plan, together with the Letterkenny Regeneration 2040 Master Plan, and Local Transport Plan have the potential to serve as the vehicles to deliver transformative change to Letterkenny over the next decade, the pillars for which were set out in the RSES in 2020, via the Key Objectives contained within the Letterkenny Regional Growth Centre Strategic Plan (LGCSP), Sec. 3.7. and Chapter 9 – which relates to the NW City Region context. The RSES, including the vision for Letterkenny, implements and amplifies the provisions of the National Planning Framework (NPF) and it was prepared with substantial input from Donegal County Council, as well as TII and other stakeholders.

It should be noted that the Regional Assembly has recently concluded its first two-year monitoring report on progress made in implementing the RSES, [www.nwra.ie/rses](http://www.nwra.ie/rses). In authoring this report, the Assembly has received feedback from multiple sources, including our constituent Local Authorities on progress in implementing the RSES and this reflects the significant engagement of many agencies during the making and implementation of the RSES, which is critically important for the ongoing development of this Region. The Assembly appreciate input from Donegal County Council through their own review of how progress was achieved in respect of their implementation of the objectives of the RSES.

In addition to the 2 year RSES progress report, the Assembly has carried out extensive work with AIRO (All Island Research Observatory) and the other 2 Regional Assemblies (Eastern & Midlands RA, Southern RA) to create and Launch the Regional Development Monitor <https://rdm.geohive.ie/> which sets out a range of Regional Indicators under various headings, including the level of ongoing investment in public realm, and transport projects across our Key Urban Centres.

A key priority of the RSES and an ongoing focus for this Assembly is the accelerated growth in our Regional Centre's of Letterkenny, Sligo and Athlone. Recent preliminary Census data and housing commencement / completion statistics indicate (albeit at this early juncture of the RSES lifespan) that all of these regional growth centres, including Letterkenny, are currently well behind targets in demographic growth and in housing supply. It is therefore critical that all potential interventions by the Council, and other stakeholders, are taken to expedite progress in the delivery of settlement growth so that Letterkenny can maximise its potential as a Regional driver over the next decade and beyond.

It is noted that this Plan has been informed by the recently launched Letterkenny 2040 Regeneration Strategy, [www.letterkenny2040.ie](http://www.letterkenny2040.ie), which sets out a number of projects / priorities across public realm and transport that integrate with the ambitions of this plan. However, the plan has not incorporated two significant projects (C1 and part of C2) located within that part of the Town Centre zone that is a high category flood risk area. The absence of their integration is not explained and this results in an absence of coherence between the strategy, the Strategic Flood Risk Assessment - including Climate Change considerations - and the LAP. This introduces an element of uncertainty about the sustainability of the plan and this needs to be explored further.

#### **North West City Region:**

Chapter 9 of the RSES sets out the key ongoing aims of the North West Strategic Growth Partnership, through the North West City Region initiative, which involves Donegal County Council and Derry City & Strabane District Council.

This partnership is also referenced in the NPF, and is considered of key strategic importance to the overall advancement of the North West, with a number of areas of mutual interest to be advanced, including elements of Local Governance, education and infrastructure. The Draft Letterkenny LAP, in its scene setting, does not outline the current position in this respect. It is vital that that the plan is amended to incorporate this detail, so that the

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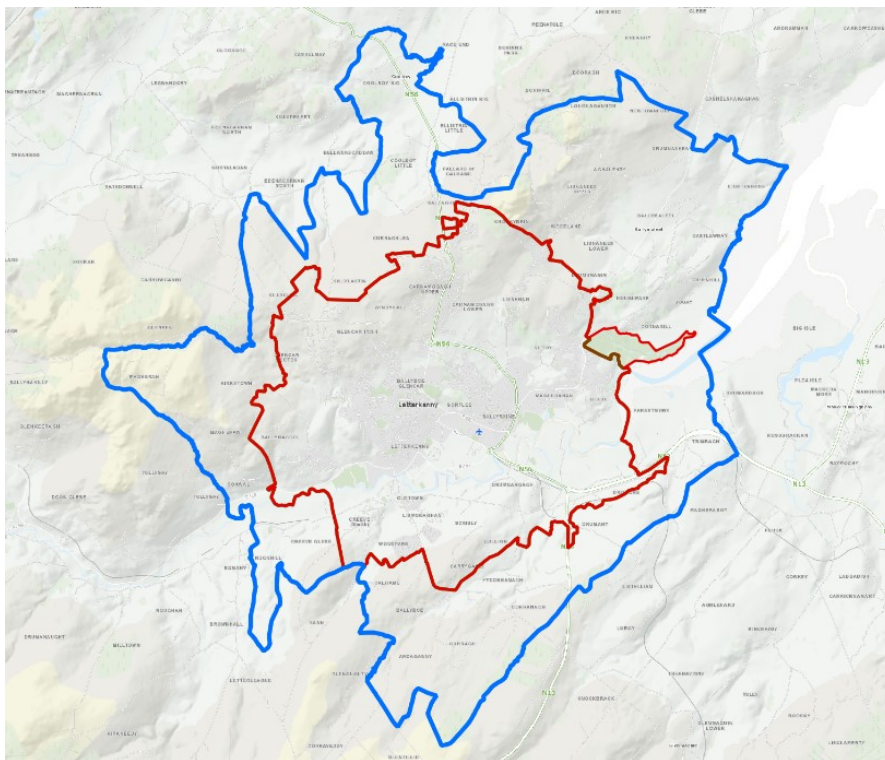
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context of Letterkenny within the NWCR is fully understood from a policy perspective, including the role of Letterkenny (and in turn the LAP) in the wider economic and social progress in the North West.

#### Plan Boundary:

The LAP boundary should be consistent with that of the RSES – Letterkenny RGCSP; the approach to the formulation of Regional Growth Centre boundaries within the RSES was based on the methodology used in the designation of the 5 Metropolitan Areas at a national level and is influenced by commuting patterns. The principle is that whilst Galway is a City of scale, Letterkenny performs city-like functions, albeit at a smaller scale and should be given a status that reflects this function. The boundary is established using Census ‘small areas’ – these are a sub-division of the Electoral Division administrative unit and enables statistical profiles to be delivered to measure progress.

The extent of the Regional Growth Centre has been designated in the RSES and it defines the boundary, having regard to the level of commuting patterns into the built-up footprint of the town. It requires that the local policy process establish the settlement development envelope and to support the retention of agricultural lands in those areas between the development envelope and the boundary of the Regional Growth Centre (See RPO 3.7.24). This Local Area Plan has failed to provide this focus and it does not address the servicing and socio-economic and environmental management issues that arise for the citizens that reside within this Letterkenny environs zone (ie. Lands between the development envelope and the Regional Growth Centre boundary). Map 1 below shows the extent of the boundary differential.



Map 1: Draft Letterkenny LAP Boundary v RSES RGCSP Boundary (Blue)

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The Draft LAP for Letterkenny does not set out why there has been a departure from the Regional Growth Centre Strategic Plan, nor is there any further explanation for the rationale for the boundary proposed, and this matter should be addressed, given the extensive differentials involved. The realignment of the boundaries is necessary to achieve consistency and it will enable progress in the growth and well-being of Letterkenny to be measured, including metrics such as investment, demographics, employment, educational statistics etc. If Letterkenny is not consistent with other centres of scale, then comparative progress cannot be measured. If progress cannot be comparatively measured, then evidence cannot be provided to support investment interventions, should the need arise.

#### **Landuse Zoning Map:**

In addition to the matter of Plan Boundary, the main land-use Zoning Map is cluttered, and requires detailed examination to interpret. It may be beneficial to divide same into a number of maps, with initially a basic land-use zoning map that avoids clutter, and thereafter having additional map(s), which illustrate the other key elements of the plan, including roads corridors, opportunity sites and other themes. The Assembly are not recommending a prescriptive approach on this matter, but are suggesting other options are considered beyond Map 7.1 of the Plan.

#### **Context and Vision:**

Notwithstanding the lack of consistency between the boundary of the Draft Letterkenny Plan and the Regional Growth Centre Plan boundary, the vision for the growth of Letterkenny over the next 6-7 years is well set out, and substantially implements the framework of the RGCSP as per Sec.3.7(b) of the RSES.

The reduction in extensive scene setting, and lengthy text as has been the recent norm in other local authority plans, is to be welcomed. It lends clarity and ease of interpretation to the chapters within the Draft Plan, but there are a number of issues of concern which have emerged as a consequence of this approach, which are:

***The absence of an evidence base for the Plan:*** There appears to be a lack of context provided in respect of the Key aims of the National Planning Framework / RSES growth ambitions for the Letterkenny Regional Growth Centre. Had the County Development Plan been varied to make it consistent with the NPF and RSES, then this would not be an issue of concern. However, it may be interpreted that the Donegal County Development Plan 2018 – 2024 is to some extent derailed as it is not aligned with the NPF and RSES policy hierarchy. Furthermore, the draft plan does not reflect upon emerging trends, including the Census of 2022 (albeit preliminary) and any implications for Letterkenny and the North West more generally. Further comment in this regard is offered below.

A noticeable absence of commentary on performance trends exists, including the 2022 Census results (Preliminary) and the implications of same for Letterkenny (and indeed wider County Donegal) even in an emerging context. It is crucial that the reader of this Plan at an early stage has a clear understanding of the recent trends for Letterkenny in sectors of

importance (eg. Employment / Demographic / Housing etc.), as the gap between the 2016 Census, and the 2022 Census is considerable. Should these initial results illustrate patterns which are potentially significant, then necessary policy interventions should be conspicuous throughout this Plan. The initial commentary around the ambitions to expand Letterkenny in general terms (see Chapter 2) as well as specific terms (i.e. demographics) should provide context on the rates of growth (eg. housing, employment, population) since the adoption of the NPF and the RSES. It could then expand upon the Policy mechanisms which the Council could utilise to address the comparative sluggishness of crucial indicators (e.g. Housing Delivery). The aforementioned 2 year Implementation Report on the RSES contains indicators which illustrate housing delivery is sluggish across all of the main urban centres of this Region.

The brief summary headline approach, employed at Chapters 2 & 3 means that the Plan at an initial stage does not clearly communicate the main ambitions / objectives for Letterkenny for the next 6-8 years. The need to ensure overall policy consistency/alignment with the NPF was clearly outlined as integral to the Plan making process by the Department of Housing Planning & Local Government in the *Implementation Roadmap for the NPF*, which was published in July 2018. Chapters 2-3 should be reviewed with this in mind, and it is suggested the approach would benefit from several headline objectives, to aid clarification and announce the key strategic goals of the Plan at an early stage. The Draft Plan does not reference the absence of a HNDA (Housing Need Demand Assessment), a key piece of the evidence base in the preparation of a plan, which was clearly signposted by the Dept. of Housing, Local Government & Heritage in 2021. The HNDA formulation is to inform local, and national scenarios around housing delivery, which will help to drive decisions on infrastructure and associated necessary community investment.

The Assembly note the planning authority has initiated a review of the current County Development Plan, however, the failure to vary the extant County Development Plan in a timely manner, as required under Section 11(1)(b) of the Planning and Development Act 2000 (as amended) to align it with the National Planning Framework and the Regional Spatial and Economic Strategy (and the associated headline ambitions across demographics and urban hierarchy), results in the Letterkenny Plan now being prepared without the necessary county policy hierarchy to rely upon, which presents a difficulty.

**Table 1:** Letterkenny: Demographic Growth Ambitions:

<b>Policy Framework</b>	<b>Demographic Target</b>	<b>Time Frame</b>
National Planning Framework	40% Uplift – 8,000 Overall: 28,000	2018 – 2040
Regional Spatial & Economic Strategy <sup>1</sup>	40% Uplift – 8,000 Overall: 27,300	2020 – 2040
Donegal County Dev. Plan 2018 – 2024	50% Uplift – 9,000 – 10,000 Overall: 29,000 – 30,000	2018 – 2031
Draft Letterkenny LAP	60 – 70% Uplift to 2031 Overall: 35,000	2023 – 2031

The Draft Letterkenny LAP should reflect a consistency with the National and Regional framework(s), and the planning authority should consider a review of the overall growth ambitions to ensure alignment with the framework of the NPF and RSES, with a general ambition to grow Letterkenny by at least 40% to 2040.

The population targets could be provided in a manner which clarifies the trends over the last 5 years, and commentary on this matter is further set out below.

The population targets should be stated with reference to the plan period in line with the lifespan of this Plan. In addition, indicative figures can also be provided to 2031 but they should be consistent with NPF and RSES targets, if stated. Given the NPF is to be refreshed/reviewed over this next year and thereafter the RSES and Donegal County Development Plan will be reviewed / renewed, there is not a sustained argument for extending the date of the targets in this plan beyond the 6 year timeframe, as they will inevitably have to be adjusted/realigned further in the medium term. The critical issue is that the plan states the targets for the plan period.

The fit with the CDP Core Strategy targets on population growth and housing units should be referenced and rationalised, as well as some commentary on the extent of extant Planning Permissions (if any exist) for residential units in Letterkenny, and if such permissions do exist, this should be reflected on the Land-use mapping, perhaps through an additional map, and referenced in Chapter 10.

### **Compact Residential Growth:**

The Lands earmarked for Residential Growth are, in the main, located within the existing development envelope of Letterkenny and, if advanced, will deliver compact growth. An assessment of the merits of all zonings has not been undertaken by the Assembly but, in

<sup>1</sup> 4,400 to 2026 & 2,200 to 2031 – Approx. 6,600 to 2031 – Bringing overall population to 26,000 Sec.3.7(b) RSES.



general terms, the Assembly consider the Residential Zonings to be well located and positioned alongside existing residential neighbourhoods, which upon delivery will lead to consolidation and lend to achieving Compact Growth. The Southern Strategic & Sustainable Development Site is an exception to the foregoing and will be elaborated upon elsewhere.

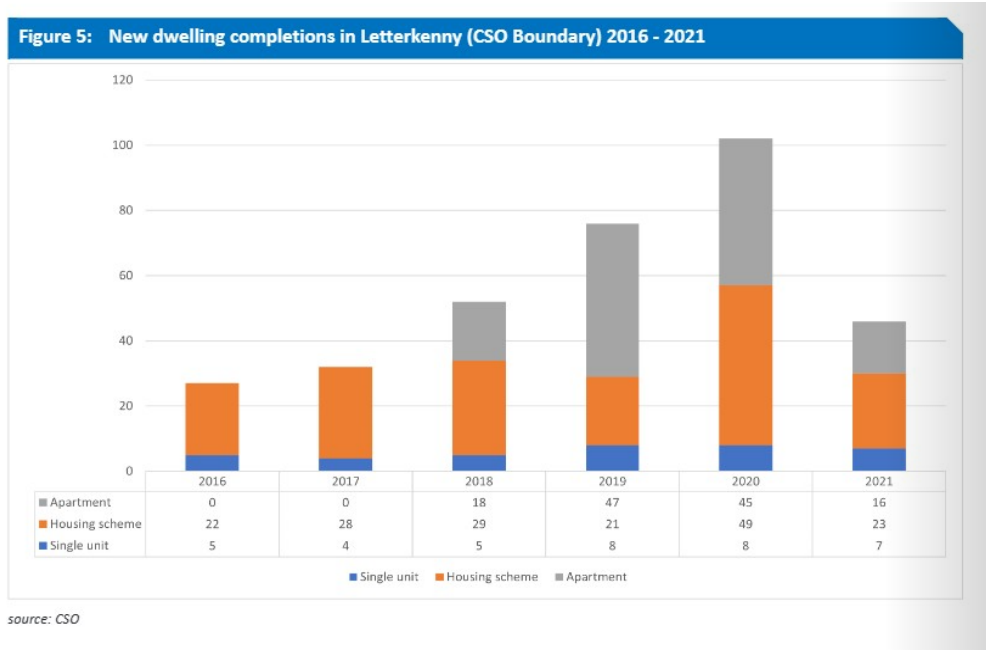
Notwithstanding, it would be beneficial if the Plan contained some reference as to how the extent of Compact Growth is to be measured in an overall context, as envisaged under RPO 3.2 (40% of all new housing within Regional Growth Centre's to be delivered within the existing built up footprint). Furthermore, the site by site analysis of the Residential sites as set out in Sec.10.6 would benefit from a map, or a series of neighbourhood maps, to accompany the text. This is done elsewhere in the document (Rf. Flood Risk, Sec. 12). It may also benefit from setting out briefly how it was informed by the tiered methodology approach in the NPF for the classification of zoned land.

The previous Letterkenny LAP(s) reference the neighbourhood approach, and this is now rebranded in contemporary planning philosophy as the 15 Minute Town Concept – as referenced in the LTP. There may be some merit in the Plan introducing a brief analysis of neighbourhoods where they are and how this 15 Minute Town Concept can be achieved, or indeed is already in effect to some extent, in a number of localities around the Town.

In the event the overall population ambitions are revisited, there is likely to be a need to review the overall residential zoning quantum.

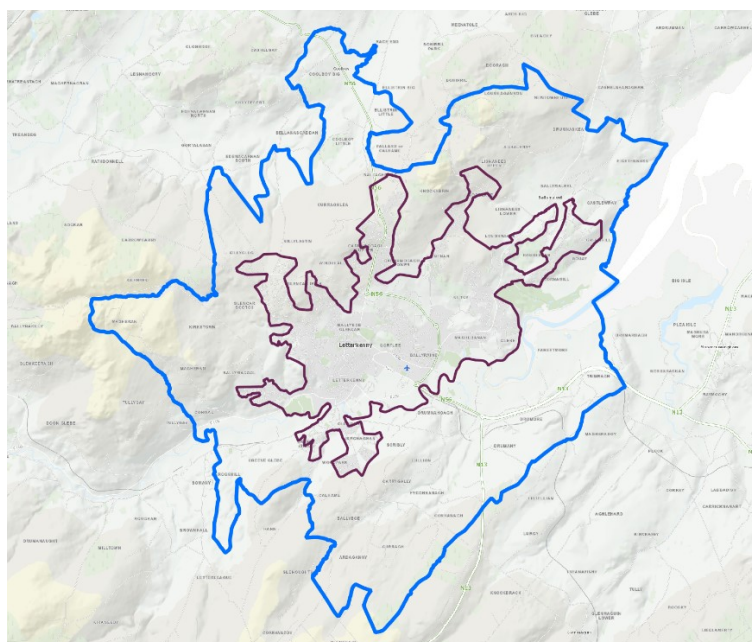
Sec. 3.7(b) of the RSES sets out a target of at least 3,000 – 4,000 additional residential units (RPO 3.7.23), and it should be noted this target extends out to 2040 and is within the context of a suite of RPOs aimed at delivering a balanced and evidence-based approach. The table below illustrates that in the 6 years between 2016 – 2021, circa 300 new residential units were constructed in Letterkenny, which would bring the annual average on delivery to approximately 50 – 60 units.

If the estimates contained within the Letterkenny Draft Plan (4,500 units) are to be extrapolated on an annual basis, the aim of this draft plan is to achieve delivery of 500 – 600 homes annually until 2031 (two years beyond the scope of this plan). This would represent a need for a tenfold increase in housing supply. The Plan does not outline what measures will be implemented to aid the achievement of such a target, nor does the Plan reference the forthcoming RZLT (Residential Zoned Land Tax) which seeks to place 3% tax on the value of a residentially zoned land, in order to stimulate activity in housing construction and delivery. It is questionable whether the RZLT as a standalone measure will provide the incentive to expedite housing delivery to the extent envisaged.



**Image 1:** Residential Growth – 2016 – 2021: Source - RSES Implementation 2 year report.

In relation to the **Southern Strategic & Sustainable Development Site**, the Assembly note these lands have been identified in the RSES and previous development plans as a potential land bank for a new neighbourhood, to bring significant residential development close to the Town Centre. Given the period of time this locality has been under consideration as a housing land bank, with the land remaining without the critical necessary infrastructure (such as Road / Bridge, Water & Waste Water), the planning authority should consider amending the wording of Sec. 10.7.7 (Infrastructural Masterplan as outlined) to set out a definitive timeframe within the lifetime of this Plan to provide the necessary infrastructure to enable several thousand homes to be developed.



**Map 2:** RSES – RGCS Boundary (Blue) v 2016 CSO Boundary.

The Assembly note that a recent round of National Development Plan (URDF) funding for similar infrastructural and engineering works in West Dublin (Clonburris) had €186m earmarked for a new town of 8,700 homes / 23,000 people. The scale of the site may not warrant pursuit of designation of an SDZ (Strategic Development Zone) under Part Six of the Planning Act but the plan would benefit from setting out how these lands will be activated to serviced land status, so that it can be developed sustainably. It is unclear if the tiered methodology requirements in the NPF for the classification of zoned land have been fully met in respect of these lands and this needs to be clarified in the plan.

### **Public Realm & Town Centre:**

The Public realm element of the Draft Plan is to be largely complemented. The content within the Plan seeks to align with the Letterkenny 2040 Regeneration Strategy (Refers: RSES RPO 3.7.26). However, it does not fully integrate two of the significant projects in the Regeneration Strategy and no rationale has been provided for their exclusion. One of the areas is Project C1 (LK Green Connect & Urban Wetlands) and the second is the complementary C2 Project (River Corridor & Greenway) – whereby the area to south of the Port Roundabout opposite the Tourism Office has been excluded. It is noted from the Strategic Flood Risk Assessment that these areas are located within the Flood Risk Zone A - where the Development Plan Justification Test fails for these undeveloped sites and therefore it is recommended that all lands within Flood Risk Zone A be zoned for Water Compatible uses only and the LAP Zoning Map 7.1 be modified to reflect this. The proposed regeneration projects referenced above satisfy the definition of ‘Water Compatible uses’ and would also be consistent with RPO 3.5, which seeks the development of quality green infrastructure. Therefore, the LAP needs to be revisited and the zoning objectives and policies need to be amended to reflect that only development that is ‘water compatible’ will be permitted on undeveloped lands within Flood Risk A areas and where the lands are developed then a restriction should be placed on the extension of these buildings beyond the current footprint, unless accompanied by a detailed site specific flood risk assessment which can identify appropriate compensatory measures that show no increase in flooding elsewhere (RF Report on Strategic Flood risk Assessment). This is necessary to comply with RPO 3.10, whereby ‘Development plans should assess flood risk by implementing the recommendations of the Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014).

The prioritisation of a Regional Transport Hub is also to be welcomed, with the identification of the preferred site for this key piece of infrastructure clearly laid out, and the ambition to link the Hub with the Green Connect project being laudable. Sec. 3.7(b) of the RSES – Letterkenny Regional Growth Centre Strategic Plan (Table 7) sets out a number of critically enabling projects for Letterkenny, and this Plan reflects very effectively the majority of these ambitions. However, whilst the Regional Transport Hub is clearly outlined as a priority, and the steps towards delivery are well laid out, it would benefit from an associated timeline for delivery, even if indicative.

The Urban Design Policies and Objectives, contained within Sec. 9.3.2.1 and 9.3.2.2 would benefit from indicative timelines, as it is noted a number of these interventions include key physical upgrades to Pearse Road and Port Road.

The RSES does not specifically provide guidance or objectives for Local Authorities with regard to their approach to Retail Zoning or policies within Town Centre locations, although Chapter 3 does reference adherence to relevant departmental circulars. The Assembly does support and welcome the overarching goal of bringing cohesiveness to the Town Centre, and linking elements of the existing old and new centres - this could be communicated better through a schematic map, with a possible improvement of Map 21.1. as a suggestion in this regard.

The RGCSP, as outlined in the RSES, identifies the need for a building heights study to be developed for Letterkenny and this is articulated through RPO 3.7.27. The draft plan does not address this issue.

In terms of the Historic Core of Letterkenny, which informs its sense of place, and the original Town Centre, the Plan could benefit from a review of Chapter 9 to give a greater emphasis to the value in retaining the original characteristics of the Main Street and Cathedral quarter, whilst linking this zone to the more recent elements of the 'new' Town Centre.

### **Employment Growth:**

The extent of employment growth envisaged via the RSES was to bring the overall total number of jobs in Letterkenny to 17,000 by 2040. There is further comment within the Letterkenny RGCSP text (RSES, P.93) which sets the minimum ambition for Letterkenny at 4,000 – 5,000 additional jobs by 2040. The Draft Plan ambition sees a figure which broadly reflects this, although given the timeframe for achievement has been reduced by 8-9 years, these targets are considered particularly ambitious.

The National Planning Framework sets out the general formula on economic growth of jobs following population growth at a ratio of 2:3 (i.e. for 2 additional jobs for every 3 additional people), and the RSES follows this target requirement. The Draft Letterkenny Plan does not adhere to this and it is considered that it should be revised, in conjunction with any overall revision of its demographic projections for the Plan period.

The overall designation of lands for enterprise and employment is considerable, and the existing business park area at Ballyraine (Link Road) has scope for significant expansion when required, with 6 plots identified, all of which would constitute Compact Growth, and a consolidation of the current employment lands around the IDA campus is supported.

Sec. 8.2. discusses the Ten-T project, and commentary indicates the scheme(s) will not be a deliverable within the lifetime of this Plan (to 2029). It is considered that, based on current timeframes involved in the Ten-T PRIP, the Scheme could (in an optimistic scenario) commence in 2026, and therefore it may be prudent to review this element of the Plan in the context of Bonagee and the Enterprise / Employment Zonings which attach to this area.

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### Critical Infrastructure & Local Transport Plan:

Chapter 6 sets out clearly the current infrastructural challenges facing Letterkenny. The Assembly accept there is an acute bottleneck in terms of the existing very restricted access into Letterkenny from the South and East, with all traffic funnelled through the 4 Lane route, with little to no alternate option available. The Assembly support the delivery of the Ten-T PRIP to alleviate this bottleneck, as reflected in the RSES (Chapter 6 – Transport investment priorities) and within Sec. 3.7(b) of the Letterkenny RGCSP. It is critical for Letterkenny and the NW region that this scheme is progressed to the Planning Stage as soon as possible.

Table 6.1 in outlining infrastructural deficits, and proposed or potential solutions, fails to give indicative timeframes as to the delivery of projects / solutions. It is suggested that the plan would benefit from timelines being provided. This could be done in the same manner as the RSES RGCSP (Table 7 – reproduced below) where projects are defined as Short / Medium / Long term, with accompanying time-frames. In the event such a timeline cannot be set out on a particular project (e.g. Rail), some indication as to the likelihood of it being carried out during the lifetime of this Plan would improve the overall plan coherence.

**Table 7: Critically Enabling Projects for Letterkenny**

Critically Enabling and Transformative Projects for Letterkenny	Indicative Timeframe Delivery (Short – 2026 / Medium – 2031 / Long – 2040)
1. Donegal TEN-T Improvement Scheme's. Strategic Regional Connectivity (N-13, N-14, and N15) including the N-56 strategic link across the River Swilly	Short/Medium
2. Letterkenny Urban Design and Masterplan for Town Centre	Short
3. Regional Transport Hub for Letterkenny	Short
4. LYIT Campus Extension	Short/Medium
5. Urban Greenway/Central Linear Park Development within Letterkenny, integrating with the Letterkenny – Burtonport, River Swilly Greenway	Medium
6. Development of Letterkenny Social Enterprise Centre	Short
7. Creating a 'Smart' Regional Centre	Short
8. Town Centre Living Scheme: Regeneration of Derelict and Vacant Sites	Short/Medium
9. Development of Town Centre Enterprise Quarter	Short

Source: Table 7: RSES – Sec 3.7(b) Letterkenny – Critically enabling infrastructure.

The inclusion of the Local Transport Plan that informs the land-use Plan is welcomed by the Assembly, and the general overriding aim of reducing dependence on car journeys as the dominant mode within Letterkenny is necessary. The main priority within the Plan is investing in active travel schemes around the Town and incorporating some of these schemes into Public Realm projects, including Green Connects within the Town Centre.

Whilst the LTP sets out in detail a number of active travel ambitions, it does not outline how workers who commute into Letterkenny could be persuaded to substitute their vehicles for

bikes / buses for local trips, be that through park and ride, Electric Bike schemes or other mechanisms. Furthermore, the recommendation to amend the plan boundary to be consistent with the Regional Growth Centre Strategic Plan boundary may necessitate a review of the LTP. The plan may also benefit from reviewing if there are opportunities to better integrate or cross-reference the LTP where appropriate within Part A.

RPO 6.27 of the RSES sets out support for the collaborative preparation of Local Transport Plans led by local authorities in conjunction with the NTA and other stakeholders, based on the Area Based Transport Assessment (ABTA) guidance produced by NTA and TII. The Land Use Planning Policies are contained in Part A of the document and the Local Transport Plan is located within Part B. There may have been an alternative way of integrating the two documents into a unitary plan demonstrating how the land use zoning has been informed by the shift in emphasis towards active and sustainable transport modes. The importance given to the TEN-T PRIPD is acknowledged and the plan may benefit from demonstrating that it is an integral part of the shift towards active and sustainable transport modes in the NW City Region and the Letterkenny Regional Growth Centre in particular.

It is noted that the LTP (Chapter 15.4) confirms that the plan is based on ILUTS (2008) and that because 2 of the 3 forecast years contained within the ILUTS have since passed, it was concluded that a more detailed review should be conducted when the Draft Plan was approved. It is unclear if this detailed review has been conducted and at which stage did the LTP inform the land use elements, whether it is consistent with the ABTA guidance and whether the LTP has been prepared in consultation with all stakeholders, including NTA and Local Link Offices as specified in RPO 6.27. The plan would benefit from clarity in this regard.

#### **Other Considerations:**

**MICA / Defective Blocks:** The Assembly note the matter of MICA/defective Blocks is not referenced in the Plan. The issue of defective buildings is a significant social and economic issue for Letterkenny and Donegal over the lifetime of this Plan. The impacts are likely to be profound in some locations and the LAP should, at a minimum, outline the implications of MICA for Letterkenny with a focus on:

- The potential number of properties affected.
- An evaluation of whether policies around house / housing estate reconstruction are necessary.
- The implication of Demolition waste management and whether a location for same needs to be identified.
- The need for interim housing solutions arising from demolition and reconstruction of houses, and consideration of temporary solutions, including modular housing as an interim measure, given the cascading effect the MICA crises will have for the next decade, and possibly beyond.

**Climate Action Plan, 2023:** The updated Government Climate Action Plan, published in Quarter 4 of 2022 contains several significant modifications to the CAP of 2021, which is referenced in a number of instances in the Draft Letterkenny Plan. The Council should

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review the Plan to ensure it fulfils all the new Government ambitions, including in the areas of transport, climate adaptation, decarbonisation of the built environment and land use.

**Smart Region / Smart Letterkenny:** The Plan does not reference any elements of Smart Region principles or outline any ambition in terms of integrating digital trends. Some consideration should be given to Sec.6.6 of the RSES, given that the ambitions of the Local Transport Plan is to bring about modal shift. There is scope to appraise how this can be implemented with the aid of technology interventions. Whilst the Plan does reference an Electric Bike Scheme (Sec. 19.5.4) and targeting behavioural change, additional policy targets may be beneficial. There is no detail on the extent of existing EV Charge points, and the number required to be installed across the network over the Plan period and how this can be realised.

In conclusion, the Assembly welcome the opportunity to comment on the plan and has concentrated its emphasis upon consistency between the Draft Plan and the RSES. As a consequence, the Assembly make the following Recommendations and Observations as a submission to the Draft Letterkenny Plan:

### **Recommendations:**

1. Review the legal and logistical implication of proceeding with this Local Area Plan in circumstances whereby the County Development Plan has not been made consistent with the NPF and RSES. One option would be to decide not to proceed with this LAP process and instead advance the local plan through the Variation to the CDP – as it has been referenced in Chapter 1.1 that a Variation is also necessary to deliver this local plan. Thus, the Variation to the County Development Plan could be advanced to replace Chapter 12 of the CDP through the inclusion of the Letterkenny Plan, together with any other amendments required to refresh the County Development Plan – enabling the Donegal policy frameworks to be made consistent with the NPF and RSES.

**When the above is resolved, the Draft Plan for Letterkenny should be amended as follows:**

2. The Draft LAP should revise the overall plan boundary to replicate that of the Regional Growth Centre Strategic Plan outlined in Sec.3.7(b) of the RSES. (See Map 1 above).
3. The Plan be modified to offer evidence based analysis and narrative on the multi-annual rate of residential unit delivery over the life of the plan and to provide evidence based targets for residential unit delivery over the plan period. (It is noted that the plan envisages a tenfold increase in supply which is not explained with sufficient clarity). The evidence base should reference, inter alia, vacancy, dereliction, extant permissions and trends which arise from the preliminary Census results of 2022 and any other relevant data, including Housing Needs Demand Assessment. Any amendments to housing targets must be reflected in the overall

quantum of zoned land for housing delivery, in a manner consistent with National Policy Objective 72(a)(c) of the National Planning Framework.

4. The Plan be amended to outline Employment targets which reflect the ambitions of the RSES (RPOs 3.7.20, 3.7.21).
5. Chapter 2-3 be amended to reflect the context of the NW City Region as provided within Chapter 9 of the RSES. This should reflect the overall future direction for the North West City Region, and by extension its relationship to Letterkenny, including any future plans the constituent Local Authorities have to advance projects / integration across sectors, as outlined in Chapter 9 of the RSES.
6. Revise Chapter 2 & 3 of the Plan to give clear definition to the Strategic aims / outcomes for Letterkenny, which are consistent with the RSES, and which together with cross cutting Climate Action ambitions can be reflected in clearly quantifiable Objectives which are precise and deliverable.
7. Include commentary and appropriate policy measures, which support the retention of existing agricultural lands between the development envelope and the Regional Growth Centre boundary, which reflects RPO 3.7.24.
8. Amend the zoning objectives and policies in the Town Centre to reflect that only development that are 'water compatible' will be permitted on undeveloped lands within Flood Risk A areas and where the lands are developed then a restriction should be placed on the extension of these buildings beyond the current footprint, unless accompanied by a detailed site specific flood risk assessment which can identify appropriate compensatory measures that show no increase in flooding elsewhere. This is necessary to comply with RPO 3.10 and presents an opportunity to deliver quality green infrastructure within the Regional Growth Centre as envisaged within RPO 35.
9. Provide for monitoring of the plan, including progress in achievement of Compact Growth (Chapter 5), as envisaged in RPO 3.2(b) & RPO 3.7.22 of the RSES. For the purpose of clarity, the RSES Glossary of terms defines Compact Growth.
10. That the Plan set out a commentary and Policy providing for a Building Heights study as part of an overall strategy to guide future development within the Centre of Letterkenny, as provided in RPO 3.7.27 of the RSES.
11. The Plan be revised to set out a clear timeframe and mechanism for the delivery of the infrastructure necessary to bring the Southern Strategic & Sustainable Development Site to serviced land status. A timeframe and delivery mechanism for the proposed Master-Plan for the Southern Strategic & Sustainable Development Site should be provided and clarification be given on funding mechanisms. The objective to deliver development of these lands is supported in the RSES as a southern residential neighbourhood and therefore the provision of enabling infrastructure over this plan period is necessary. However, the suitability of the lands for the delivery of housing units needs to be evidenced through the application of the tiered methodology requirements in the NPF for the classification of zoned land. In the absence of this methodology being satisfied the zoning should not be



advanced during this plan period and alternative lands should be explored elsewhere where the tests are met.

### Observations:

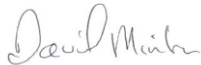
1. The mapping for the Plan should decouple the basic Land-Use Zoning Map from other elements of the Plan, including proposed Road Corridors, junction Improvements, numbered Opportunity Sites (and other) which should be denoted on a separate map, which would aid ease of reference overall.
2. The Plan, particularly Chapters 5 & 9 be reviewed to afford enhanced recognition and due prominence to the value of the historic core of Letterkenny, and the original sense of Place which informs the Development Strategy and Placemaking goals. In particular the value in retaining the original characteristics of the Main Street and Cathedral quarter, whilst linking this zone to the more recent elements of the 'new' Town Centre would be of benefit.
3. Consider the implications of the MICA / Defective Block crises and the likelihood of significant scale of residential demolition, and the Planning and Land-use management issues that will arise over the lifetime of this Plan period.
4. Chapter 9 of the Plan be modified to elaborate upon the implications of a new Retail Strategy to be delivered through the next iteration of the County Development Plan in 2024, given the absence of a Retail Strategy specific to Letterkenny in this Local Area Plan.
5. Chapter 6 of the Plan be modified to provide for clarification on the timeline for the delivery of projects as outlined (Table 6.1). A suggested approach would be to define projects as Short / Medium / Long term, or to elaborate as to whether a scheme / infrastructure is to be completed within the lifetime of this Plan.
6. Chapter 8 of the Plan be revised to consider a scenario which reflects the Ten-T PRIP being delivered within the lifetime of this Plan, i.e. before 2029.
7. Demonstrate how the TEN-T PRIPD will be an integral part of the shift towards active and sustainable transport modes in the NW City Region and the Letterkenny Regional Growth Centre in particular.
8. The plan should consider opportunities for the LTP to be integrated more fully with the Land Use Policies to deliver sustainable mobility as a core element of the plan and to clarify that the LTP has been prepared based on ABTA guidance, in consultation with the NTA, Local Link Office and other stakeholders, in a manner consistent with RPO 6.27. It should further clarify that a detailed review has been undertaken as referenced as being necessary in Chapter 15.4.
9. Consideration be given to the identification of the various 'neighbourhoods' as contained in current/previous policy frameworks and include a neighbourhood analysis of the concept of '15 Minute Towns'. This analysis may reveal areas which require further consolidation through other policy mechanisms.
10. The Plan should be reviewed in the context of the recent publication of the updated and revised Climate Action Plan 2022, including the climate ambitions therein

around sustainable travel, and decarbonisation of all sectors, including the built environment.

11. Chapter 9 of the Plan should be revised to incorporate indicative timeframes for the commencement / construction / completion of projects as outlined.
12. That Chapter 10 be reconfigured to identify Residential sites by location as well as numerically (including maps) before outlining key considerations associated with the lands.
13. That Chapter 11 be reconfigured to identify Opportunity sites by location as well as numerically, and consideration be given to several maps for particular areas of Letterkenny, for ease of reference, given the extent of such sites (12no. in total).
14. The Plan incorporate and integrate the principles of a Smart Place / Smart Region to Letterkenny, with the potential to employ emerging technologies to aid other policies, including the Local Transport Plan ambitions around Modal Shift.

The Assembly wish to thank Donegal County Council for the opportunity given to comment upon the Draft Plan and Local Transport Plan and is available should any clarification on the submission be required.

Mise le meas,



**David Minton**  
**Director**