



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

8 September 2023

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

## **RE: MATERIAL ALTERATIONS TO THE DRAFT LETTERKENNY LOCAL AREA PLAN & LOCAL TRANSPORT PLAN 2023 – 2029**

A Chara,

I refer to your notification on 11 August 2023 of the proposed Material Alterations to the Draft Letterkenny Local Area 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.

It is not proposed in this submission to comment in detail on individual proposed Material Alterations except where they may have a regional significance. The submission does however examine them at a macro level and comment on their consistency or otherwise with RSES objectives.

The Assembly made a detailed submission to Donegal County Council in February 2023 on the Draft Letterkenny Plan and Local Transport Plan. The said submission raised a number of critical issues which related to policy hierarchy consistency, lack of alignment with the RSES, and the Letterkenny RGCSPP therein, as well as a potential over zoning of residential land for a quantum of units far in excess of what was required. Additionally, the Plan did not set out a context / commentary on the years from 2016 – 2023, and the trends / evidence base associated for Letterkenny.

The growth of Letterkenny is critical to the wider NW Region, and its status as a Regional Growth Centre is enshrined within the National Planning Framework (NPF) under Project Ireland 2040, and further amplified through the Regional Spatial and Economic Strategy 2020-2032 (RSES) for this region.

The RSES provides significant strategic direction, in particular within Sec 3.6. which contains the Regional Growth Centre Strategic Plan (RGCSPP). The performance of Letterkenny is therefore of regional significance and is worthy of careful analysis, particularly in light of

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](mailto:info@nwra.ie)

slow growth statistics across a number of areas in recent times, (See Census, 2022 as example).

The submission of the Regional Assembly to the Draft Plan contained detailed commentary on the need for consistency of the LAP with the RSES in a number of areas, including the following,

- Overarching Vision – Regional Growth Centre & North West City Region
- Plan Boundary, Zoning & Compact Growth
- Residential / Housing delivery, and future targets
- Infrastructure & Critical Projects, including time-lines on delivery (LTP)
- Employment Growth.

It contained 11 Recommendations, and 14 Observations. Set out below are the Recommendations and Observations summarised in brief, and a commentary on whether the input of the Assembly in each case has been addressed in the Material Alterations and an opinion is provided in respect of those Material Alterations of strategic importance.

#### **RECOMMENDATIONS made at Draft Plan – Summarised for brevity:**

1. Review the implications of proceeding with the LAP in the circumstances where the Donegal CDP has not been made consistent with the NPF & RSES. It was further suggested that a variation to the CDP in advance of the making of this LAP would be an option.

**Commentary:** MA 1 has now introduced a new context and narrative around the NPF & RSES. Although the text therein refers to RSES population projections, what is actually set out in the RSES is a population ambition/target.

Table 10.1, as now proposed, contains Uplift figures which are now consistent with the RSES, both to 2026 (4,400) and 2031 (2,200). The additional commentary in MA 1 acknowledges the very low housing completion figures for Letterkenny from 2016 – 2022, and in order to make up for this shortfall (as per the RSES ambition/target), the new housing targets must now factor this lack of delivery into the equation. MA 1 goes on (See 10.2.2.) to state that Letterkenny has been severely underperforming in the delivery of housing supply in recent years, and as a result, the new calculations on housing supply targets must factor in such underperformance in order to bridge the deficit created since 2016. The commentary also notes there were 2400 international arrivals into the County, a significant number in Letterkenny, with the War in Ukraine a main contributor, which has added a significant burden of demand in the accommodation sector.

2. Draft LAP should revise Plan Boundary to be consistent with RSES Sec. 3.7(b).  
**Commentary:** The Boundary has not been revised, and is retained as per that originally proposed. MA 12 contains commentary (and a map of both the RGCS and LAP Boundary) which notes the Regional Growth Centre Boundary is more extensive

**Northern and Western Regional Assembly**

**The Square, Ballaghaderreen, Co Roscommon**

 +353 (0)94 986 2970  +353 (0)94 986 2973  [info@nwra.ie](mailto:info@nwra.ie)

than the Plan Boundary, and the area between the two will be dealt with by policies set out in the forthcoming County Development Plan. There is no clear explanation of why the LAP does not reflect the Regional Growth Centre Boundary. The Regional Growth Centre Boundary was set out to take account of small areas, commuting patterns, and in the case of Letterkenny, 3 major National Schools, which are located on the outskirts of the Town. Lurgybrack NS, Woodlands NS, and Illistrin NS have between them circa 1,500 pupils, and the Assembly believe the movement of traffic to and from these schools on a daily basis should form part of the Letterkenny LAP and indeed Local Transport Plan. This has not been addressed in the Material Alterations, and represents a missed opportunity with regard to achieving modal shift / sustainable travel.

3. Plan Should be modified to offer an evidence based analysis and narrative on annual residential unit delivery. Tenfold increase in supply estimated in Plan without proper explanation.

**Commentary:** MA 1 offers commentary on the lack of delivery, and also the narrative accompanying the Alteration points out the Zoning of a site for Residential Development does not mean the site will be advanced for the delivery of housing. It is put forward that, given the extent of the supply shortage since 2016, lands beyond the required amount are Zoned to ensure sufficient flexibility within the lifetime of this Plan. There does not appear to be any commentary as to how a tenfold increase in supply can be delivered, although the lack of residential unit supply across Regional Towns is pronounced, and not unique to Letterkenny, and there are a multitude of factors associated with this, including market economics, labour force, and mortgage dynamics. There would be benefit in referencing site activation measures that could be taken.

4. Amend Plan to outline employment targets as set out in the RSES.

**Commentary:** It does not appear this matter has been addressed through the MAs.

5. Chapter 2 & 3 be amended to reflect the context of the NW City Region, as provided in Chapter 9 of the RSES, including the future strategic direction of same.

**Commentary:** MA12 provides for a paragraph of context, where Letterkenny's place and role within the NWCR is elaborated upon, and the RSES Letterkenny Regional Growth Centre Boundary, and LAP Boundary are illustrated in Fig.1.3 (Map).

6. Revise Chapters 2 & 3 of the Draft Plan to give a clear definition to the strategic outcomes for Letterkenny which are consistent with the RSES, include Climate Ambitions, and which are deliverable.

**Commentary:** There does not appear to be decisive changes within Chapters 2 & 3 of the Plan, reflecting Strategic Outcomes / Climate Change policy prioritisation. However, it is acknowledged there has, via the proposed Material Alterations, been significant highlighting, and mapping of active transport measures, including

Northern and Western Regional Assembly

The Square, Ballaghaderreen, Co Roscommon

 +353 (0)94 986 2970  +353 (0)94 986 2973  [info@nwra.ie](mailto:info@nwra.ie)

additional mapping of walking and cycling routes, (Appendices A,B,C & D), as well as Appendix E & F, which are to be commended, and clearly outline multiple locations for interventions for pedestrians / cycling, albeit, without defined time frames.

7. Include commentary and policy measures on retaining agricultural lands. RSES – RPO 3.7.24.

**Commentary:** It does not appear this matter has been addressed in the MAs, and it is acknowledged that in the absence of the LAP boundary reflecting the RGCSP boundary, it is arguably a missed opportunity for the LAP to be fully consistent with and supportive of the RSES vision for Letterkenny’s designation as a Growth Centre of Regional/National significance.

8. Amend Town Centre Zoning policies to reflect only developments which are water compatible on lands within ‘Flood Risk A’, and additionally measures to prevent build on lands already within Flood Risk A.

**Commentary:** MA 3, 4, 9 and 10 includes significant additional text in relation to Flood Land Use Zoning which is welcomed. In particular, MA3 clarifies the following:

- A flood relief scheme for Letterkenny is to be designed, and constructed, but this will take several years to bring forward.
- The Flood Zone Mapping consists of 2 Areas, A & B. Areas proposed to be development East of the Isle Burn cannot generally be justified and are confined to be a very narrow number of uses, which are in themselves subject to assessment.
- Within Flood Zone B is considered highly vulnerable, and again, significant restrictions are outlined.

9. Provide for Monitoring of the Plan, and measure for charting Compact Growth achievement.

**Commentary:** There does not appear to be any elaboration upon a mechanism for monitoring progress for the Plan between now and 2029. The Assembly consider periodic review and monitoring to be essential for the effective implementation of policy and identification of additional measures (if necessary) to ensure progress over the lifetime of this Plan.

10. Commentary on setting out Building Heights Study, as provided for in the RSES.

**Commentary:** MA 13 sets out a commitment to undertake a building heights study for Letterkenny, no timeline is associated with same. The Assembly believe a time schedule for its publication / preparation should be included in the wording of this policy.

11. Revise the Plan to set a clear time-line for the delivery of critical infrastructure as well as a timeline surrounding the Southern Strategic Site, and the associated infrastructure required to enable same be developed.

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

 +353 (0)94 986 2970  +353 (0)94 986 2973  [info@nwra.ie](mailto:info@nwra.ie)

**Commentary:** MA 14 relates to the Southern Strategic & Sustainable Development Site, and the alteration of the extent of this site (which has been significantly reduced). The Alteration also retains a suite of infrastructure interventions necessary for the bringing forward of this site for delivery, however, there is no clear time-line associated with these works (which includes the construction of a new bridge across the River Swilly at Leck).

**The Assembly submission to Draft Plan make the following observations, summarised for brevity:**

1. Mapping should decouple land-use mapping from other elements of the Plan (e.g. Projects).

**Commentary:** Mapping Amendments as part of the MA process includes a number of cycling and walking maps which are clear, and helpful (e.g. Town Centre Linkages, and interventions, Appendix B)

The Land-use Zoning with MAs mapped is also provided, albeit it is somewhat cluttered and may benefit from further review.

2. Chapters 5 & 9 should be reviewed to reflect the historic core of Letterkenny, and the associated placemaking goals necessary to reflect this.

**Commentary:** There does not appear to be any modifications to the Plan with regard to an enhanced emphasis on the Historic Core of Letterkenny.

3. Consider the implications of MICA, and residential demolition on a large scale.

**Commentary:** The implications of MICA are not referenced in the MAs.

4. Chapter 9 should be modified to expand on the implications of a new retail plan.

**Commentary:** MAs do not comment on new retail plan, or future retail direction.

5. Chapter 6 of the Plan should be modified to include clarification on the delivery of timelines on projects, Short / Medium / Long.

**Commentary:** Schemes identified under ABTA (Appendix A are earmarked to be carried out within the lifetime of this Plan, and would benefit having timelines - Short / Medium / Long Term.

6. Chapter 8 of the Plan should be revisited to reflect a scenario where the Ten-T Project is delivered, or partly delivered within the lifetime of the Plan.

**Commentary:** The MAs do not include elaboration on the Ten-T project, or its delivery.

7. Demonstrate how the Ten-T Project will contribute towards active / sustainable travel.

**Commentary:** MA 59, whilst not including the future specifics of the Ten-T project, does outline Strategic Roads (N-56) active travel measures, which it intends to extend to the Mountain Top. The measures concerned are to be welcomed.

8. The Plan should demonstrate more clearly how the LTP should integrate with the land-use zonings, in consultation with the NTA.

**Commentary:** MAs 59, 60, 61 & 62 provide significant additional detail on proposed pipeline public transport, and modal shift measures, and the alterations proposed to the Plan in the area of Transport significantly enhance the overall LAP. These proposed alterations will be of benefit to the plan.

9. Consideration should be given to the identification of neighbourhoods contained within previous policy frameworks.

**Commentary:** The MAs do not revisit the idea of neighbourhoods, however there are a number of references to neighbourhood centres within Sec. 19.3 (Appendices A & B) when outlining Walking and cycling measures. These are to be welcomed.

10. The Plan should take account of the Climate Action Plan, 2022 – 2023.

**Commentary:** There are no additional references in the MAs to the Climate Action Plan, however, it is acknowledged the Alterations include a significant number of schemes (walking and cycling) which will contribute towards sustainable mobility (See No.8 above & Sec. 19.3 Multi Modal interventions).

11. Chapter 9 should outline timeframes for Projects outlined.

**Commentary:** See No. 5 above.

12. Chapter 10 be reconfigured to identify Residential sites by Location as well as numerically.

**Commentary:** MA 1 (Sec. 10.2.3.) includes a table, which outlines Residential Sites within the LAP by number, locations are not included, this would be beneficial for completeness.

13. Chapter 11 should be reconfigured to identify Opportunity Sites by location as well as number (12 in total).

**Commentary:** MA 1 (Sec. 10.2.3) includes a table, which outlines Opportunity Sites by number, not location. The identification by location may be of benefit to the user of the plan.

14. Integrate the principles of Smart Place / Smart Region, technologies in this respect can aid modal shift.

**Commentary:** No reference to Smart Place / Smart Region within the MAs.

**Conclusion:**

The Assembly are generally satisfied the Letterkenny Plan, subject to the Material Alterations, now illustrates a greater consistency with the RSES than was the case previously.

Nonetheless, the boundary, as defined for the Letterkenny RGCSP within Sec. 3.6 of the RSES was laid down utilising small area data on commuting, and residential patterns, and also incorporated 3 large Primary Schools, which fulfil the educational needs of a very significant cohort of young families in the Town. The traffic movements (daily trips) generated, including scope towards modal shift, should in the Assembly's opinion be assessed as part of an integrated approach to the management of the sustainable development of an accessible urban centre of regional/national influence.

The Material Alterations, at their outset, make clear through statistical evidence that there is a clear and ongoing significant shortfall in residential supply, which will constrain the ambitions of the NPF and RSES which seek to grow the Town by 40% to 2040. It is acknowledged some of the contributing factors in the housing sector are not directly within the Local Authorities control.

Furthermore, MA 13 does not provide for a time schedule for the publication / preparation of the Building Height Study and this should be included. Similarly, timelines for delivery of infrastructure envisaged in MA14 should be provided.

Finally, the Assembly would ask that the following additional issues be included / addressed prior to the finalisation of the Plan:

- The Assembly would strongly recommend a Policy Monitoring mechanism forms part of the final Plan, as without same, it is questionable if elements of the Plan can be effected by 2029. It may prove the case in the short / medium term, and during the lifetime of this Plan, some elements of the land-use policies require modification, and a LAP monitor could potentially highlight unforeseen developments.
- The Assembly previously advocated a clear timeframe be illustrated for key enabling infrastructure projects; this is intrinsic to a multi annual strategy and land-use Plan, regrettably timelines remain largely absent, and note Appendix F (Town Centre Linkages) as a further example in this regard.
- That the Plan at its outset incorporates a goal on employment ambitions, in line with the ambitions for residential growth, in order to ensure the future economic role of Letterkenny as a Regional Growth Centre is underscored. Reference to RSES population projections should be amended to targets.
- That MA 44 be reconsidered, as an educational campus at this location currently does not have adequate accessibility, and does not contribute to compact growth or consolidation, as it effectively would represent an extension beyond the built up footprint of the Town at Ballymacool / Kirkstown.

The Assembly wish to thank Donegal County Council for the opportunity given to comment upon the proposed Material Alterations and is available to discuss the contents of this submission should any clarification be required.

Mise le Meas



**Denis Kelly**  
**Director**