



Draft Ministerial Direction/Letterkenny Plan  
Central Planning Unit, Donegal County Council  
County House  
Lifford  
Co. Donegal  
F93 Y622.

Via email: [planningcpu@donegalcoco.ie](mailto:planningcpu@donegalcoco.ie)

25 January 2024

## RE: DRAFT MINISTERIAL DIRECTION ON LETTERKENNY LAP / LTP 2023 – 2029

A Chara,

I refer to the Department of Housing, Local Government and Heritage's Notice of Intention to Issue a Direction to Donegal County Council regarding the Letterkenny Plan and Local Transport Plan 2023-2029 dated 20 December 2023.

The Northern & Western Regional Assembly initially submitted a detailed submission and assessment of the Letterkenny Local Area Plan and Local Transport Plan in February 2023, and undertook a further review and submission of the Material Amendments process in September 2023.

The Draft Direction has been issued following consideration by the Minister of the recommendation made to him by the Office of the Planning Regulator. The Draft Direction is to:

- a) Delete the following zoning objective from the adopted plan, i.e. the subject land is unzoned: (i) PR 17 Glencar Scotch and Killyclug — i.e. the subject lands change to unzoned from Primarily Residential.
- b) Reinstate the following zoning objectives and associated text to that of the draft plan:
  - i. MA30(B) PR 12 Creeve — i.e. the subject lands revert to Local Environment and Established Development from Primarily Residential.
  - ii. MA31 PR 1 1 Killyclug — i.e. the subject lands revert to Local Environment from Primarily Residential
  - iii. MA34 PR2 Castlebane i.e. the subject lands revert to Local Environment from Primarily Residential
  - iv. MA44 Ballymacool — i.e. the subject lands revert to Local Environment from Community and Education
  - v. MA42 Bunnagee — i.e. the subject lands revert to Open Space from General Employment and Commercial

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

The Draft Direction provides a Statement of reason in the following terms:

I. The Local Area Plan as made includes zoning objectives and material alterations to the draft Local Area Plan, which zone additional residential land in excess of what is required for Letterkenny as determined by the planning authority in the Local Area Plan in accordance with the growth targets for Letterkenny under RPO 3.7.20 and RPO 3.7.23 of the Regional Spatial and Economic Strategy (RSES). These zoning objectives and alterations are located in

peripheral and non-sequential locations, some of which are outside the CSO boundary, and would encourage a pattern of development in particular locations which is inconsistent with the objectives of the County Donegal Development Plan 2018-2024 to implement a sequential approach to development (Objective UB-O-2 and Objective CS-O-12) and RPO 37.22, RPO 3.1 and RPO 3.2 of the RSES for compact growth; would undermine the achievement of the RSES 'People and Places' Growth Ambition; and demonstrates that the Planning Authority has failed to have regard to the Development Plans Guidelines for Planning Authorities (2022) issued under section 28 of the Act.

II. The Local Area Plan as made zones a circa 11.6 ha parcel of land for Community and Education, which zoning objective could accommodate a range of social, community and education uses. The land is located in a peripheral location largely outside the CSO boundary and in an area with poor accessibility. Furthermore, there are multiple other suitable zoned sites closer to the town centre and in areas within safe walking distance of local services and residential areas where such facilities could be provided. The material alteration is therefore inconsistent with the objectives of the County Donegal Development Plan 2018-2024 to implement a sequential approach to development (Objective CS-O-12), to promote sustainable development and transportation strategies in urban and rural areas (Objective CS-O-17), and the locational criteria for new social and community infrastructure/service related developments (Policy CCG-P-I), and would undermine the achievement of the RSES 'People and Places' Growth Ambition.

III. The Local Area Plan as adopted zones land for vulnerable uses within flood risk zone A which has not been subject to and passed a plan making Justification Test. This zoning objective is inconsistent with the County Donegal Development Plan 2018-2024, in particular objective F-O-2, by not demonstrating a solid evidence base that the proposed land use zoning objective will satisfy the sequential approach to flood risk management. In this regard the Local Area Plan is not consistent with RPO 3.10 of the RSES, and fails to have regard to The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) issued under section 28 of the Act.

IV. The Local Area Plan has not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator under section 31AO of the Act.

V. In light of the matters set out at I to III above, the Minister is of the opinion that the Local Area Plan as made is inconsistent with the objectives of the Development Plan of the area.

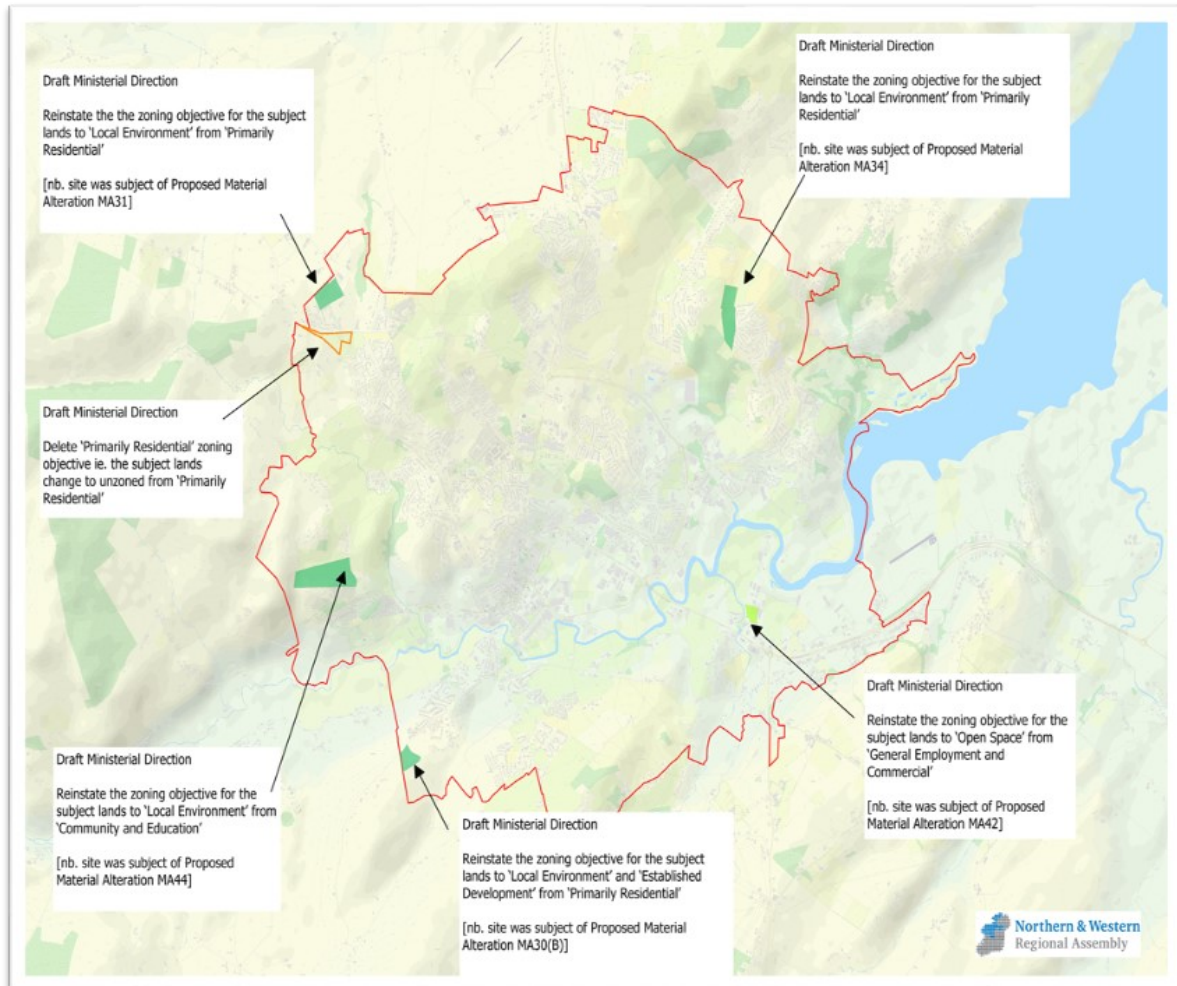
VI. The Local Area Plan as made is not consistent with the objectives of the RSES Contrary to section 19(2) and section 27(1) of the Act.

VII. The Minister is of the opinion that the Local Area Plan as made is not consistent

with objectives of the National Planning Framework, including National Policy Objective 33 and National Policy Objective 57.

VIII. The Minister is of the opinion that the Local Area Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.

IX. The Local Area Plan is not in compliance with the requirements of the Act.



**Map 1:** Locations of Letterkenny LAP & LTP subject to Draft Ministerial Direction

The focus of the Draft Direction is upon Policy / Zoning Provisions which are viewed by the Minister as inappropriate in designation with several at a peripheral location, with Zonings in Residential & Educational uses, and Lands identified as Liable to Flooding all requiring modification. This submission sets out its position in respect of each matter, and in the analysis, clearly outlines the position of the Assembly during its initial submission on the Draft Letterkenny LAP & LTP, as well as the Assembly's comment at the stage of the Material Alterations on the Letterkenny Plan (September 2023).

**Draft Direction 2 (a) - Delete the following zoning objective from the adopted plan, i.e. the subject land is unzoned: (i) PR 17 Glencar Scotch and Killyclug — i.e. the subject lands change to unzoned from Primarily Residential:**

The Assembly in its initial assessment of the Letterkenny LAP & LTP (Feb 20220) submitted a lengthy report to Donegal County Council. Therein, the Assembly noted that some elements of the Plan lacked an evidence base, and the statistical analysis in demographic terms (throughout the Draft Plan) were reliant upon the 2016 Census figures, and not the 2022 Cenus figures. The Assembly qualified in its commentary that it had not undertaken a full assessment of the Residentially Zoned lands, however it was noted generally those lands zoned were adjacent to existing residential development. The Assembly noted a very dramatic increase in housing output was required to meet National, and Regional ambitions, with the current housing supply delivery requiring a tenfold increase annually.

The Assembly did suggest that the Plan lacked neighbourhood analysis (which is now referred to frequently as 10 or 15minute town). The lands in question at Glencar Scotch / Killyclug in this instance are adjacent to an extensive residential neighbourhood, with several hundred houses to the East, it is also worth noting there is a neighbourhood shop / filling station, fast food outlet within very close proximity of these lands (approx. 200 – 300m walk). This is an established neighbourhood focal point located to the North of PR 17, with a number of established services, which renders the site as falling within the definition of consolidation of the overall Killylastin / Killyclug area, and whilst this residential area does lie at the North Western margins of Letterkenny, it has the characteristics of a neighbourhood which is already fixed, with scope for residential expansion. The Ministers Statement of reason also cites a lack of consistency with the principles of the RSES (People & Places), and RPO 3.1 and 3.2 are applicable in this instance. However, the Regional Growth Centre Strategic Plan for Letterkenny, as set out in Sec. 3.7(b) of the RSES outlines Killylastin (Glencar Scotch) as an area for new residential development, based on the aforementioned neighbourhood model. Accordingly, the Assembly consider the residential zoning proposed for this site to be appropriate.

**Draft Direction 2 (b) - Reinstate the following zoning objectives and associated text to that of the draft plan:**

**(i) MA30(B) PR 12 Creeve — i.e. The subject lands revert to Local Environment and Established Development from Primarily Residential.**

**Opinion:** The subject lands are peripheral, and are located at the southern edge of the town boundary, given the extent of alternative lands closer to the Centre of Letterkenny, given the principles of compact growth, and the extent of the built up footprint of the town already established, the assembly agree with the removal of these lands from Primarily Residential Zoning.

**(ii) MA31 PR 1 1 Killyclug — i.e. the subject lands revert to Local Environment from Primarily Residential.**

**Opinion:** The comments relating to PR 17 (at 1.1 above) are similarly applicable in this case. The Assembly via the RSES has identified this area as a potentially neighbourhood for residential growth, alongside a number of other locations across Letterkenny. This is a part of the overall strategy to grow the Town by 40% by 2040, and provide an additional 3,000 – 4,000 houses (RPO 3.7.23) to enable this ambition. There are a number of parcels of land at this location which are Zoned General Employment, and should these lands be developed to provide housing, it is the Assembly's view this

would reinforce a neighbourhood which is already established via a number of ancillary services, including a shop, take away outlet, and public house. In conclusion, the Assembly consider Primarily Residential Zoning as appropriate at this location.

**(iii) MA34 PR2 Castlebane i.e. the subject lands revert to Local Environment from Primarily Residential.**

**Opinion:** The lands in question were not the subject of any comment by the Assembly in its previous submissions. There is a sizeable housing development immediately to the East of the site, however it is the case that proximity to an arterial route as well as proximity to neighbourhood services at this location are remote. It is notable there are 2 significant residential sites to the South, along the main Kilty Road, which are more suitable in terms of access and distance to the Town Centre, and Services. Therefore, the Assembly consider the Draft Ministerial Direction in this regard to be justified.

**(iv) MA44 Ballymacool — i.e. the subject lands revert to Local Environment from Community and Education.**

**Opinion:** At the stage of Material Amendments to the LAP and LTP, the Assembly identified the proposed MA 44 (proposed use of lands as an educational campus) as potentially problematic. The Assembly noted in its submission the lands were without adequate access, and given its location, did not contribute to compact growth to the Western edge of Letterkenny. The Assembly also concluded the lands if developed would represent an unnecessary extension beyond the built up footprint of the Town in the Ballymacool / Kirkstown neighbourhood(s). It is the view of the Assembly these concerns remain valid, and the Draft direction to have the lands Zoned as Local Environment is warranted.

**(v) MA42 Bunnagee — i.e. the subject lands revert to Open Space from General Employment and Commercial.**

**Opinion:** The lands are located on the Eastern bank of the River Swilly, and adjacent to a number of existing employment / commercial uses. The site is currently green field, and whilst it could reasonably be argued the development of the site would represent an infill development (a form of compact growth), it could similarly be argued the location does not represent a sequential approach to employment and commercial development, with a proliferation of such units around the Bunnagee area. Additionally, the lands are identified via the CFRAMS River Flood Extents are Liable to Flooding (Coastal), and it is unclear what mitigation is offered in the justification for the Zoning. It may well be the case this area will require a revised land-use evaluation should the Donegal Ten-T Scheme proceed, with the associated Bunnagee Link likely to significantly alter the setting and access of a number of sites in the vicinity. The Assembly agree the revision of the Zoning at this location to open space is reasoned, particularly in light of the Flooding concerns associated with the River Swilly Basin.

## Conclusion

The Assembly fully supports the Draft Direction in respect of the following measures: Reverting to the suggested zoning outlined in respect of the lands at Creeve, Castlebane, Ballymacool & Bunnagee.

The Assembly does not consider the removal of Residential Zoning to Local Environment of lands at Killylastin ( MA 31 / PR 11) and the deletion of residential zoning at Killyclug ( PR 17) to be wholly consistent with the RSES. Sec. 3.7(b) of the RSES – Letterkenny Regional Growth Centre Strategic Plan sets out a number of neighbourhoods across Letterkenny as suitable for residential growth. The area of Killylastin / Killyclug is one such area, where additional housing would be located to consolidate an existing neighbourhood, which already has several community services. The Assembly would request this element of the Draft Direction does not proceed.

I trust that the above is of assistance and the Assembly wish to thank Donegal County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas



**Denis Kelly**  
**Director**

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

 [+353 \(0\)94 986 2970](tel:+353(0)949862970)  [+353 \(0\)94 986 2973](tel:+353(0)949862973)  [info@nwra.ie](mailto:info@nwra.ie)