



The Central Planning Unit  
Donegal County Council  
Country House  
Lifford

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

12 October 2023

## RE: DRAFT DONEGAL COUNTY DEVELOPMENT PLAN 2024-2030

A Chara,

### REPORT ON THE DRAFT DONEGAL COUNTY DEVELOPMENT PLAN 2024 – 2030.

I refer to notification dated 5 August 2023 of the Draft County Development Plan (2024-2030) and thank you for the opportunity to provide this submission.

The Assembly is required under S27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the draft and its core strategy, in particular, is consistent with the Regional Spatial and Economic Strategy (RSES) and its objectives. The Regional Assembly is required to make recommendations to the council on any amendments necessary to ensure the Draft Plan is consistent with the RSES and to issue its report, recommendations and observations. This submission will follow the chapters sequentially as set out in the Draft Plan and offers commentary on consistency on an ongoing basis, with Recommendations and Observations being provided at the end.

The draft Donegal Development Plan comprises 3 Parts:

- (i) **Part A:** The Written statement , with Chapters 1-16.
- (ii) **Part B:** Chapters 17-20 relating to Draft Local Area Plans for Ballybofey / Stranorlar, Bunrana and Bundoran.
- (iii) **Part C:** Chapter 20 - Settlement Plans for Towns / Villages (54 in total), with Maps, divided on the basis of Municipal District.

Even allowing for the extent of Documents above, there are a number of documents which do not form part of the Draft Plan, which are normally intrinsic to the process, such as:

- Economic & Social Profile of County,
- Landscape Character Assessment Review, albeit, it is accepted the LCA conducted for County Donegal is relatively recent.

The accompanying Environmental documentation includes the SEA (Strategic Environmental Assessment), the AA (Appropriate Assessment), SFRA (Strategic Flood Risk Assessment), prepared by Roughan / O'Donovan Ass, and Strategic Water Status Impact Report, prepared by ARUP.

The Assessment of the Draft Donegal Plan sets out material in sequence, from the 21 chapters of the written document, commencing with the Core Strategy outline, and detailing some of the accompanying documents as referenced above.

It is not proposed to offer detailed comment on the 3 Draft Local Area Plans for Ballybofey – Stranorlar, Bundoran and Buncrana, as the Assembly do not normally comment on settlement detail below the level of RSES Key Towns / Regional Growth Centres.

Finally, it should be noted the Assembly did comment (via Submissions) in detail on the Draft Letterkenny LAP 2023 – 2029, (and Local Transport Plan) earlier this year, and has recently (August 2023) made a detailed submission on the proposed Material Alternations to the Draft Letterkenny LAP.

### **General Comments & NWRA assessment of the Draft Plan:**

It should be highlighted at the outset the Donegal Draft County Development Plan is a generally well-constructed series of documents, and it is very clear in its presentation, and its ambitions for County Donegal over the next plan period, which are communicated with 7 Strategic Objectives outlined within Sec.2.4.

All of County Strategy: However, it should be noted that Strategic Objective S-0-3 refers to an All of County Strategy, which is not mentioned or elaborated upon thereafter, and it is unclear to the Assembly whether there is any policy framework to support this, beyond it being stated as a Strategic Objective. In this regard there is reference to West Donegal (the Glenties Municipal District) being amongst the most deprived in socio-economic terms in the country, with a Socio-Economic study or profile referenced, but this is not published with the Plan, nor are there policy objectives or narrative which articulate how the Council intend to address this geographical disadvantage through interventions.

Letterkenny LAP & LTP: The decision of Donegal County Council to proceed with the Draft Letterkenny LAP and LTP in advance of the Draft Donegal County Development Plan (given the 2018 Donegal CDP was the only Plan in the Region which was not varied following the adoption of the RSES) has proven problematic. One of the challenges which arises in this Plan, is the lack of appropriate level of focus given within the County context to holistically set out the significance of the Role of Letterkenny as a Regional Growth Centre and its role as part of the North West City Region, and to fully articulate the goals for the Regional Growth Centre over the next period. Given the Local Area Plan process was not finalised at the time of Publishing this Draft, there are implications in terms of the Planning Hierarchy, and utilising the Draft County Development Plan to Frame Policy instruments at settlement level.

Part A of the overall Core Document of the Draft CDP is divided into 16 Chapters, and for the purposes of evaluation, this Submission will comprise a brief analysis, and evaluation of each Chapter or Chapters by Grouping, and ultimately comment on the consistency or otherwise of the Draft Plan with the RSES.

### Chapters 1,2 & 3 – Introduction, Vision & Ambition, Core Strategy:

**Vision:** The stated vision for Donegal is to grow the County to a population of 200,000 people by 2040. This is to be done through a number of strands, including strengthening the North West City Region and linkages with Derry City & Strabane District Council (DCSDC), as well as through the Atlantic Economic Corridor (AEC) initiative.

There is no significant elaboration on how the Council intends to expand on existing arrangements in these 2 areas, except to reiterate the NPF and RSES policies within Chapter 2 (Vision). The Vision as it pertains to this Plan, in this chapter or elsewhere, would benefit from setting out how Donegal County Council intend to amplify/deliver upon the stated vision, and what mechanisms are in place, or will be put in train to foster enhanced economic / educational / local government activity (through action plans or other levers).

The **Core Strategy** sets out clearly the aim to grow Donegal in line with the NPF and RSES ambitions, and the County population targets set out in the NPF Roadmap are generally on track when benchmarked against the results of the Census 2022. The aim of the Core Strategy during the lifetime of this Plan is to apportion 30% of population growth to Letterkenny as the sole Tier 1 settlement, with a further 26% to be attributed to the 5 County Growth Drivers of Buncrana, Ballybofey – Stranorlar, Donegal Town, An Clochan Liath, and Killybegs.

The reduction to 5 settlements (from 8 in Layer 2A and 15 in Layer 2B) in the previous Plan within Tier 2 of the hierarchy is to be welcomed. Whilst Buncrana, and Ballybofey – Stranorlar are considerably larger in population than the other 3 Towns identified, it is accepted that in a County as extensive in geography as Donegal that it is necessary to identify and target other centres for urban growth that perform similar functions albeit at a different scale. The 3 remaining settlements serve a hinterland which are distinct in West Donegal (An Clochan Liath), South West Donegal (Killybegs) and South Donegal (Donegal Town). The apportionment of housing growth within all of these settlements appears to be reasoned.

The third Tier of towns within the Plan are described as Service Towns, and they are described as playing a key role within sub regions of the County, there are 7 such towns, including Milford, Carndonagh, Ballyshannon, Bundoran, Raphoe, Lifford and Bunbeg-Derrybeg,

The Core Strategy does not apportion housing units below the level of Service Towns. This effectively means the 8% of growth which is earmarked for Rural Settlements (which the Assembly calculate to number 48) is not broken down in each village. This could prove problematic in monitoring the Plan, and could result in anomalies between different villages / towns over the Plan period, and perhaps the Council could re-examine this element of the Core Strategy.

The **Housing Strategy** is well set out within Chapter 3 of the Plan, with the Housing Supply Targets clearly apportioned, and explained. The issue in Donegal over the last decade is a consistent annual undersupply of Housing units, this trend is replicated across the Region, and not unique to the County. The Housing Strategy notes the overall supply needs to increase to almost 1300 houses per annum over the next 6-9 years, this will require a trebling of current output. With increased mortgage / loan interest rates, building material / supply inflation, and increased labour costs, it would appear to be a considerable challenge to extend output of units in line with the output ambition.

Additionally, Donegal is acutely impacted by the MICA / Defective Block crises. The *Report of the Working Group on the Defective Concrete Block Crises*<sup>1</sup> estimates there are approximately 5,800 houses affected in County Donegal. Many of these dwellings will have to be demolished and reconstructed over the lifetime of this Plan, and the subsequent Development Plan. It is the view of the Assembly given the scale of the difficulties relating to Defective Block / MICA, and the impact the crises will have on overall housing output, this matter should form part of considerations within the Housing Strategy for the County to 2030.

Given the extent of works required under any State funded Mica / Defective Block Scheme, it is very likely the labour and skills supply available within the construction sector will be a challenge. Furthermore, the plan does not consider the management of demolition waste arising from the demolition of Mica affected properties or from other sources of activity.

A further consideration relates to the number of displaced families who will require temporary accommodation whilst dwellings are being reconstructed / remediated. It is not inconceivable that modular / emergency accommodation may have to be provided to ameliorate the crises, particularly in the worst impacted urban locations (i.e. Housing Estates in some Towns / Villages).

The Council should set out clearly its approach, and policy interventions to address these matters.

#### **Chapter 4 - Climate Change:**

The Climate Change Section of the Plan is brief, running to 5 pages, which predominantly reflects the current policy framework in respect of International and domestic Climate Action policy. The Chapter does not clearly articulate a Climate Action policy for County Donegal, although it does refer to cross-cutting measures which are set out elsewhere in the Plan, such as Sustainable Mobility and compact growth.

The Donegal Climate Change Adaptation Strategy 2019 is referenced, however there have been very significant additions to Government Policy, including the CAP (Climate Action Plan) of 2023 that would be relevant.

The identification of a Decarbonising Zone for the County is not referenced. The pursuit of the Compact Growth strategic outcome outlined in the NPF & RSES could also be factored into the commentary within this Chapter.

It is suggested the Chapter could benefit from a revision which reflects the very significant contribution already being made in County Donegal in the area of Renewable Energy. Indeed, it is arguable the same observation also applies to Chapter 9, where the narrative should also clearly outline the extent of Renewable Electricity being fed into the National Grid from Wind Energy across the County.

#### **Chapter 5, 6 – Villages & Towns, Housing,**

Donegal County Council has achieved some significant gains in the area of Town & Village Renewal via the RRDF and URDF Schemes in recent years, and the projects are well highlighted within the Draft Plan. It is now the Council's intention to focus on some of the smaller settlements, – supporting the role of small and medium sized towns. The Council have identified 13 settlements which will be examined and a programme for interventions in each location developed. This is a laudable ambition

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<sup>1</sup> Report of Working Group – MICA / Defective Block Crises - Published by Department of Housing, Heritage & Local Government in September 2021

which is consistent with the RSES RPO 3.13 and it could be enhanced through the inclusion of a timeframe for the delivery of a report / programme (whether perhaps combined for all settlements or divided via Municipal District or other geographical basis).

The Housing Chapter (6) sets out in clear terms, and in some detail the extent of the housing stock in the County at present, the position of the rental market, the state of play of house process, vacancy, the reasons for vacancy, as well as factoring in the recent influx of refugees into the County, and the implications for availability of residential accommodation. The Assembly comments as applied above (Housing Strategy) remain applicable here, with the MICA / Defective Block Crises requiring to be factored into the overall evaluation of housing supply / availability.

Serviced Sites and the Ready to Build Scheme are referenced at Chap. 6.1.16 of the Draft Plan. Within the RSES, RPO 3.7 guides Local Authorities to identify a rolling programme of developing serviced sites. The RPO is not reflected in Chapter 6, nor is there any elaboration on the roll out or development of any programme across any of the Towns / Villages in the County. The inclusion of some commitment in this regard would benefit the Draft Plan alignment with the RSES.

The extent of Social Housing demand across the County is significant, with a detailed breakdown provided by settlement, which is very well set out in Chapter 6. The Council estimate Social Housing will comprise 36% of total housing delivery (HNDA 6.1.18). This represents a very high proportion of future build, and will require a notable investment at Local Authority and State level, and whilst figures have been provided on Housing supplied by AHB's (Approved Housing Bodies), there does not appear to be similar figures in relation to Social Housing supplied on the Local Authority side, so as to provide the public with an approximate idea of the capacity to supply the 2,800 houses required (See Table 6.1.17).

Rural Housing: The Council has divided the County into 4 Rural Area types , including the introduction of Areas under Holiday Home Pressure. The Assembly consider the Draft Plan may not be sufficiently robust in how it has identified Areas Under Strong Urban Influence, as the evidence base being relied upon in respect to commuting patterns, and other factors which inform such classifications, appears to relate to the current County Development Plan. Thus, the relevant data is at least 6-7 years old. Given the release of 2022 Census Data by the CSO at Small Area level in recent months, it would be logical that the Area's Under Strong Urban Influence (including the influence of Derry City / Strabane) are reviewed and modified accordingly.

The Assembly note there is no reference to RPO 3.3, which seeks to bring a ratio of 20% in new Rural development on brownfield sites. Given the extent of derelict / disused houses / wall-steads in some rural areas of the County, Policy RH-O5 should be reviewed to bring effect to this objective and align the plan with the RSES.

### **Chapter 7 – Economic Development:**

The Economic Development focus within the Plan reflects on the current and emerging trends. The growth potential and direction of travel of Donegal within the context of the North West City Region (NWCR) within this Chapter could be improved and built upon.

The 6 Key Pillars of the Economic Development framework outlined at Chap. 7.4. are clear, coherent and welcomed – being structured under the following headings:

1. Aligning economic development and job creation with the core strategy
2. Zoned and Serviced Employment Lands

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

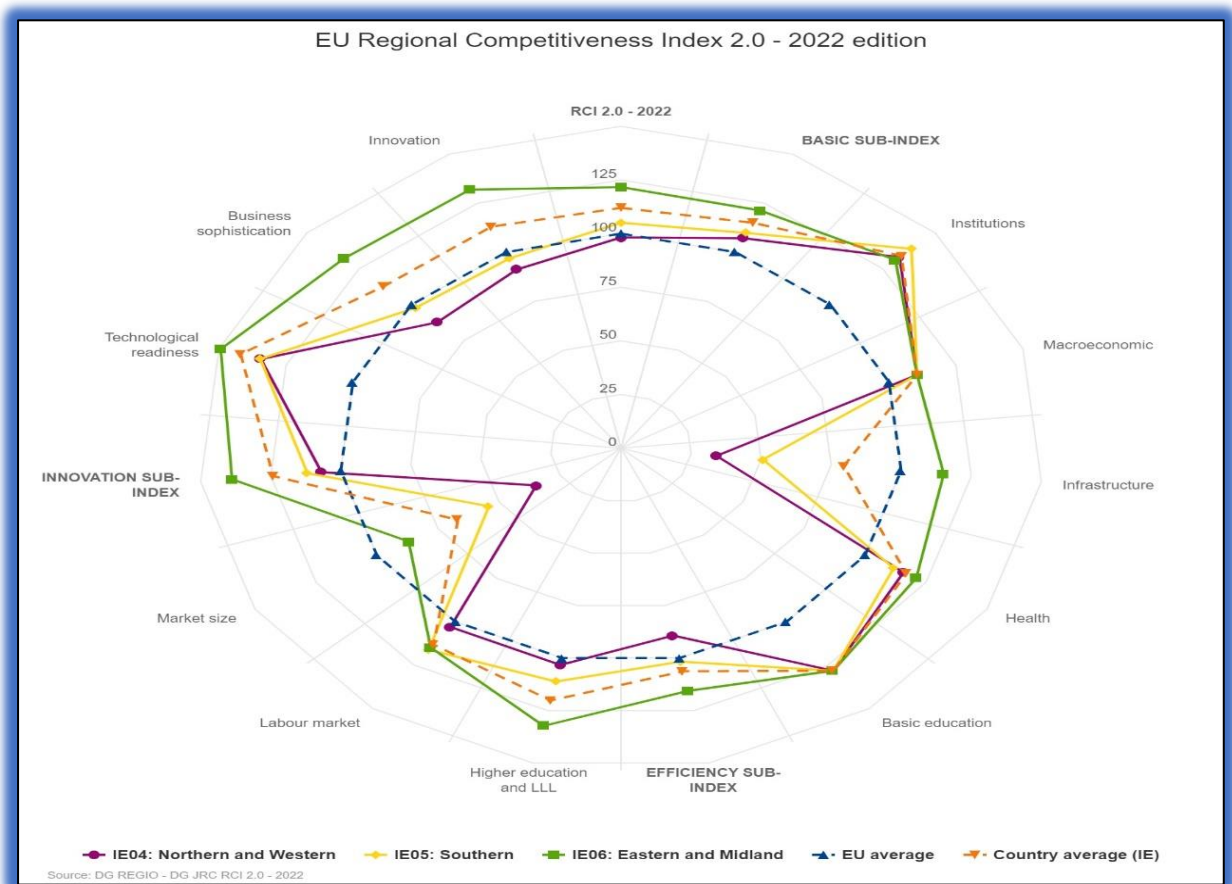
 +353 (0)94 986 2970  +353 (0)94 986 2973  [info@nwra.ie](mailto:info@nwra.ie)

3. Strong and Vibrant Towns and Village Centres
4. Supporting and facilitating growth in key industry and business sectors
5. Delivering Key Strategic Infrastructure
6. Proactive and Supportive Business Culture

Donegal has made significant progress on the provision of Digital Hubs and Co-Working spaces across the County, and whilst this is articulated at Chap. 7.1 & 7.4.5, the Hubs (circa 15 being the figure mentioned) should be detailed and mapped to provided additional spatial clarity.

Excluding Housing, which has already been commented upon, the future economic success and development of County Donegal is contingent to a significant extent upon the provision of key enabling infrastructure. The legacy of underinvestment over decades has been identified as an issue of strategic concern in terms of its competitiveness, and impact on inward investment and economic growth.

The recent results of the EU Competitiveness Index show the Region fairing very poorly in a National and European Context, and this is reinforced in Donegal, which remains without rail and has not benefitted from necessary significant investment in transport infrastructure projects of scale.



**Fig.1: Index scores of the NUTS 2 Regions of Ireland in the European Commission’s 2022 “Regional Competitiveness Index”, (Blue line = EU27 average)**

Without the roll out of a number of projects of scale, the plan has identified that it will not be possible for Donegal to reach its potential, and grow its population, labour force, and retain its third

level graduates, and young workers. There are a number of critically enabling projects identified as crucial and these should be highlighted more prominently within Chapter 7:

- The Ten-T Scheme Route Improvement
- The conclusion of the delivery of the National Broadband Plan
- The continued expansion of the ATU
- The pursuit of an expanded and diversified role for Killybegs Port
- Enhancement of National Grid capacity to enable Marine Renewable Technology development in the future.
- The progression of a Rail Service for County Donegal
- Significant enhancement of Public Transport provision, including a Transport Hub in Letterkenny.

The identification of specific jobs targets of one job per resident worker for the key settlements as set out in table 7.1 of the plan is to be welcomed. The particularly weak position of Buncrana, as the County's second largest settlement (Resident Workers to population Ratio of 0.854) should be noted and there would be benefit in the plan reflecting any specific objectives / series of interventions that can be put in place for the specific Key Towns as part of the longer-term strategy to improve the performance of those underperforming Towns.

There would be benefit in referencing the Bio-Economy sector, where there are Regional Policy Objectives in Chapter 4 of the RSES, which attempt to bring effect to the ongoing work at National Level, there is currently no reference directly or indirectly to this element of rural economic activity with the Draft Plan.

It is noted that the plan acknowledges the importance of the Marine and Blue economy within Chapter 7. However, the plan could articulate more clearly how it is delivering upon Regional Policy Objectives 4.3.1 - 4.3.5 of the RSES, with particular reference to Killybegs and Greencastle, which are noted as being of regional significance in the RSES. It could also reflect upon the support given in the RSES to examining the feasibility for pursuing the designation of Killybegs Port as an EU TEN-T Comprehensive Port. These issues should also be articulated/cross referenced in a consistent manner with those within Chapter 14.

The narrative of the chapter is very coherent and the importance of supporting the viability and vitality of towns of all sizes is clear. However, the policies of the plan within this chapter appear weighted towards facilitating economic development proposals of varying scales within the rural area that may have unintended consequences for the towns and villages.

The nature and scale of Businesses being facilitated under Policies ED-P-5, ED-P-6 and ED-P-7 should be reviewed and the implication for driving the transition towards net zero carbon emissions should also be a consideration in this regard. The opportunity to provide additional policies that guides and enables business development within towns in accordance with the 6 Key Pillars should be reviewed and expanded upon.

### **Chapter 8 – Infrastructure:**

The infrastructure Chapter is extensive, and covers Roads, Water, Wastewater and Broadband / Telecoms.

Roads: The RSES extensively gives effect to the priorities of the NPF which seek to bring greater connectivity to the North West of Ireland and increase inter-urban speeds. There are a number of

**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)

National Primary Routes within Donegal which have been identified in NR2040 (2023, TII) as requiring support / intervention<sup>2</sup> (Letterkenny – Lifford N-14, Letterkenny – Sligo N-13 & N-15, Letterkenny – Derry N-13), and the same routes are all prioritised in Regional Policy (RPO's 6.7, and RPO 6.8).

The Key Strategic Objective of Delivering the Donegal Ten-T upgrade Scheme at the outset of this Draft Plan, (Chap. 2.4) is welcome, and is supported by the Assembly.

Table 8.1.8 includes 20 Transport Projects, however these projects are not classified as Short / Medium / Long Term in delivery, and it would appear a number of the projects are already completed (e.g. Dungloe – Glenties N-56 Upgrade). The table should be modified to provide a guide to the public on the status of each project, and a categorisation in terms of the likely approximate delivery of the scheme.

In respect of Greenways, at Table 8.2 the same comment applies, there are a number of schemes contained therein, which are not given a current status, and have no accompanying timeline, despite same being available on the TII Website.<sup>3</sup>

The N-56 National Roads Exemption as described for single dwellings within Policy TP-12b, and c: is not consistent with the objectives of the RSES (RPO 6.5), and it is the position of the Regional Assembly the policy should be removed from the Plan.

The rationale for the policy appears to lack an evidence base, is not supported by statistical analysis, does not include a breakdown of traffic volumes of the N-56, and furthermore, the Map which accompanies the Policy (Map 8.1.3A N-56 Exemption from the National Roads Policy) does not tally with the description of the Policy, as the extent of the N56 to be exempted for single dwelling access extends much further East than the Log Cabin (at Derryfad, Creeslough) and along the entire extent of the N-56 to Letterkenny.

In respect of Policy TP-17, which the Assembly note also forms part of the Transport solution within the proposed Letterkenny LAP, there are 9 commuter villages identified for park / ride or share hubs. Any such scheme should be subject of a feasibility study, and a timeline for this being carried out should be a short term ambition, with a delivery of the recommendations therein an ambition for the medium term, and in any case within the lifetime of this Plan. This should be clearly reflected in Chapter 8.

Rail: Chapter 8.1.3.2 of the Plan should be revised to reflect the publication of the All Island Rail Review, and whilst the reintroduction of Rail in County Donegal cannot be achieved within this Plan period, the Infrastructure Section of the Plan should give some elaboration as to what may be possible in the Medium – Long Term, and set out the policy ambition of Donegal as it applies to Rail across the North West Region.

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<sup>2</sup> Inter Urban National Primary Roads Target of 90kmph, set out in NPF & Sec. 5.4.1.1. of **National Roads 2040 (04 – 2032)**.

<sup>3</sup> [www.tii.ie](http://www.tii.ie) – Projects and Improvements Archive



## Chapter 9 – Natural Resource Development:

In respect of Wind Energy, the current County Development Plan was varied in mid- 2022, providing a new Wind Energy Policy Framework<sup>4</sup>.

The Draft Plan carries that policy forward. The Assembly prepared a detailed submission (June 2022) in respect of that Variation, and broadly supported the approach taken by Donegal County Council and considered it to be generally consistent with the RSES, save for a number of suggested Observations, including requesting a review of the proposed policy on Turbine Setback from dwellings, outlined in the variation at 10 times the Tip Height.

Notwithstanding the above, the NWRA did acknowledge in its submission the County has facilitated an extensive number of Wind Energy projects, and there barriers (Inability of the Grid to transport the Wind Energy produced during production spikes), which needs to be addressed to enable additional significant wind energy projects, which may require Grid reinforcement and strengthening to be explored further with Eirgrid.

It is also worth noting that DHLGH and DECC is considering the potential for delivery of Power Capacity Targets for Onshore Wind and Solar PV. This may be articulated through the revised NPF and thereafter the Regional Assemblies being tasked with the delivery of RRES (Regional Renewable Energy Strategies) for this Region, which may set out a minimum Power Capacity Target for Onshore Wind and Solar PV. across the region, with a spatial dimension.

There is likely to be significant storage capacity opportunities in the area of excess wind energy produced in the coming years, and the Plan should reflect this.

The NWRA supports the Wind Energy policies outlined at the conclusion of Chapter 10, including WEP-01, 02 and 03, which place additional safeguards on Glenveagh National Park, St. Johns Point, designated views prospects etc.

The policy Framework on Extractive industries (9.2) would appear to lack certain detail. There are ongoing issues with aggregate supply in County Donegal, with a decreasing number of suppliers within the County, this is not acknowledged within the Draft Plan. The Quarry Guidelines for Planning Authorities (2004) outline that areas of aggregate potential are identified and that these should be mapped, and this is potentially an area the Council could consider. The Defective Block / MICA crises will necessitate such supply matters are resolved for the lifetime of this Plan and beyond.

The Plan (Beyond Chapter 9) does not contain any reference to the Bio-Economy nor its potential within County Donegal relative the National Bioeconomy Statement. The RSES sets out a number of RPO's in this regard, and the Draft should be revised to take into account of how it will implement RPO 4.27, 4.28 & 4.29.

## Chapter 10 – Tourism:

The Draft Plan at 10.2 correctly identifies the Tourism sector as critically important to Donegal and highlights the prospect of conducting a review which will identify and prioritise projects for

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<sup>4</sup> The Wind Energy Variation was subsequently subject to a Draft Ministerial Direction (Sept 2022), where the NWRA again prepared a submission as a consultee in the process.

investment, the Assembly would suggest this review should be given a clear timeline within the Development Plan.

Outside of accommodation provision, some elements of Tourism policy are within the control of the Local Authority, directly or indirectly. There are current gaps in basic facilities for visitors which present across the County, with an opportunity to further improve support infrastructure at Malin Head, Errigal, and An Grianan of Aileach, which, whilst not included at Table 10.1, are in the Top 5 most visited sites in Donegal. There is an opportunity for the Council to lead and advocate for the shared provision of access, parking, public transport and facilities to key rural sites, as is envisaged within Sec. 4.4. of the RSES.

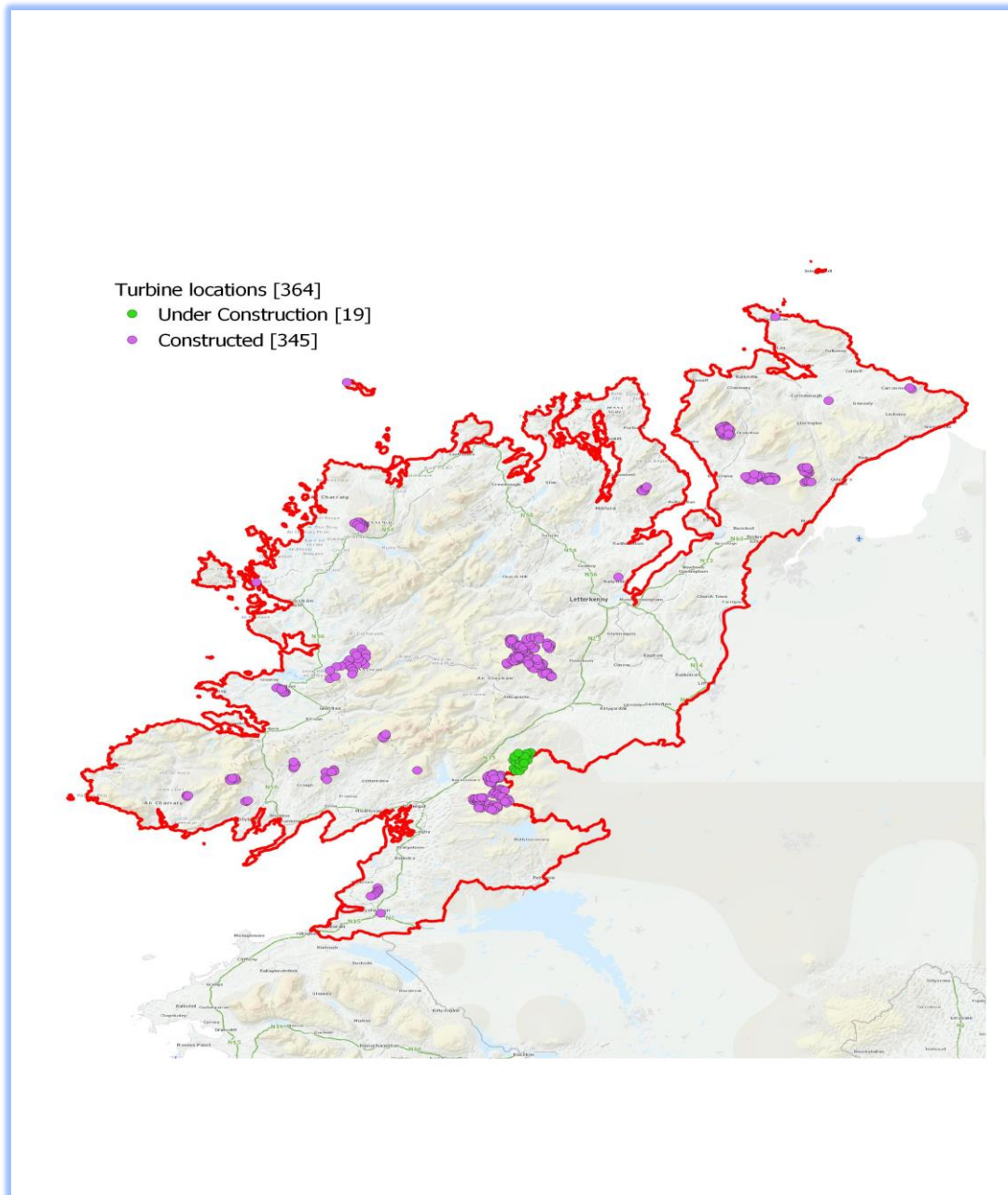


Fig.2: Wind Energy Projects in Donegal 2022 – 2023, Source NWRA.

## **Chapters 11 – 14 Natural & Built Heritage, Community Development, Marine Coastal Management & Islands, An Gaeltacht:**

The approach to Landscape Protection is generally reflective of the current County Development Plan, with EHSA (Especially High Scenic Amenity) HSA (High Scenic Amenity) and MSA (Moderate Scenic Amenity) areas mapped, together with views / prospects. The LCA adopted by the Council in 2016 may over time require update / review, however it remains a useful tool in supporting the development of planning policy and the approach to Landscape classification by the Council has been generally consistent over a number of Plan periods. There is approximately 23% of the Landmass of the County designated as EHSA, and generally the value and character of the mountains / uplands, and coastal headlands are well protected in terms of development management policies and objectives.

Chapter 11.3.2 outlines the ongoing work in adding over 2,000 buildings to the Record of Protected Structures, and this is to be done within the Lifetime of this plan. All of the proposed additions are currently on the National Inventory of Architectural Heritage.

Chapter 13 (An Gaeltacht) sets out the ambitions of the Irish Language Plans in County Donegal, which are also given and the policies / objectives therein are reasoned. The RPO's (5.8 – 5.12) within the Regional Strategy which pertain to the Gaeltacht are well reflected.

Chapter 14, Marine Resource, Coastal Management and the Islands sets out the existing significance of Killybegs and Greencastle, with a number of policies reflecting the ambition of the County to take advantage of FOW (Floating Offshore Wind). These policies are consistent with the general vision / objectives set out in the RSES, RPOs 4.31 – 4.34.

Marine Spatial Planning expert, Dr. Cormac Walsh, was commissioned by the NWRA to review the implications of DMAPs (Designated Marine Area Plans) and the conclusions were published in June 2023, are covered in the NWRA's publication Marine Spatial Planning and preparation of DMAPs, which is available at the provided link.<sup>5</sup>

Chapter 15, Rights of Way & Chapter 16 Technical Standards – The Assembly have no additional comment.

### **Other Considerations:**

The Draft Plan whilst comprehensive in some areas, is lacking in timelines, which are absent in terms of projects, and priority areas of work. Correspondingly, the Draft Plan does not contain any mechanism for monitoring, or reviewing the progress / performance of the Plan, or elements of the Plan, which includes the fundamental matters of Housing, and Housing Delivery. The Assembly would strongly recommend this element of the Policy is remedied. The Reviewing of progress is intrinsic to the implementation of any Plan, and the RSES (Sec.10.4) is instructive in this regard. The first 2 year Implementation Report for the RSES has been published, and highlights amongst other matters the pronounced lack of Housing delivery across Regional Growth Centres, and Key Towns. Furthermore, the Regional Development Monitor (RDM) co-created by the 3 Regional Assemblies

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<sup>5</sup> [Marine Spatial Planning and the Preparation of Designated Maritime Area Plans \(DMAPs\) | Northern and Western Regional Assembly \(nwra.ie\)](#)

provides further statistical and analytical support across a host of indicators, which are regularly updated<sup>6</sup> and may be of value to the plan.

Finally, there is no reference within the Draft Plan relating to SMART regions / SMART technology with public services / interface across County Donegal. Section 6.6 of the RSES is instructive in this regard, particularly with the Backdrop of Budget 2024 including the addition of a Smart Regions Fund.

#### RECOMMENDATIONS:

- (i) The Plan be amended to exclude the N-56 access exemption contained within Policy TP-12b & c. The Policy as presented is without an evidence base, and is contrary to Regional Policy, RPO 6.5, as well as National Roads Policy set out by Transport Infrastructure Ireland (TII).
- (ii) The Plan and its Core Strategy / Housing Strategy be amended to account for the current and future wide ranging implications of the Defective Block / Mica Crises in County Donegal, including the potential reconstruction of 5.800 houses. The revision should reflect upon the need for temporary / modular accommodation and the impact the crises will have upon the construction sector in terms of short & medium term overall housing output, including the effects this may have on the targets for urban centres set out with Sec. 3.4 of the RSES.
- (iii) The Rural Housing Policy within Chapter 6 be amended to modify the areas designated as 'Under Strong Urban Influence' to reflect the updated data on commuting patterns, contained within Census 2022, and the patterns contained within the small areas as they relate to Letterkenny, Buncrana, , Lifford, Donegal Town, Ballyshannon and Bundoran. The implication of cross-border commuting from Derry City & Strabane District Council area should also be considered.
- (iv) The Plan be amended to include a Policy Objective (potentially an amendment to Policy RH-05) and accompanying detail which gives effect to RPO 3.3, which seeks to ensure 20% of new rural development occurs on brownfield sites
- (v) The Plan be amended to give clear structure to the *All of County Strategy* outlined as a Strategic Objective at SO-3, which is not amplified or detailed thereafter across any of the Chapters.
- (vi) The Plan be amended to include a Monitoring and Review Mechanism to enable ongoing measurement of Policies / Goals therein. This should include quantifiable indicators where progress / performance can be evaluated.

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<sup>6</sup> <https://rdm.geohive.ie/>

**OBSERVATIONS:**

- (i) Incorporate a narrative in Chapter 2.1 - 2.4 that clarifies how the Ambition at Chapter 2.1 is to be delivered and the role that Chapter 2.2 – 2.4 will play in delivering on the vision/ambition of the plan.
- (ii) The Plan be reviewed to consider allocating a Housing quantum within the Core Strategy for the 48 Rural Villages within the Settlement Hierarchy. The quantum could perhaps be based on municipal boundaries, geographical areas, or, grouped with villages categorised together.
- (iii) Consider how demolition waste will be managed, including waste arising from the demolition of Mica affected properties.
- (iv) Section 4 of the Plan be enhanced to give an elaboration to the Council's approach across Climate Action, and Mitigation. This should include a reflection of measures such as progress on a designated Decarbonising Zone, as well as a possible emphasis in area's where the County is contributing substantially (e.g. Renewable Energy / measurement of compact growth etc.).
- (v) Chapter 5 of the Plan be reviewed to provide for an indicative Timeline relating to the assessment of the 13 identified settlements identified for targeted Village Renewal / Regeneration interventions.
- (vi) Chapter 6.1.18 including the HNDA to be considered for revision in terms of clarification, if it can be provided, on the extent of the Council's capacity to deliver on Social Housing Demand within the Plan Period.
- (vii) Chapter 6.1.16 of the Plan be reviewed to potentially put in place a programme which gives effect to RPO 3.7, where a programme of rolling serviced sites is envisioned on an incremental and rolling basis.
- (viii) Chapter 7 of the Plan be reviewed to further emphasise the progress and extent of digital / co-working hubs across the County, which may include a map to reflect and identify the locations of same, including any additional proposals in the sector.
- (ix) Chapter 7 of the Plan (or indeed the Plan at its outset) be revised to include and highlight the consideration of a concise list of Critically Enabling Projects, which the Council see as key to the future success of the County within the Lifetime of this Plan
- (x) Chapter 7 to reflect more clearly how it is delivering upon Regional Policy Objectives 4.3.1 - 4.3.5 of the RSES, with particular reference to Killybegs and Greencastle, and the potential to examine the feasibility for pursuing the designation of Killybegs Port as an EU TEN-T Comprehensive Port.

- (xi) Chapter 7 to be reviewed to reflect any specific measures needed to improve the relatively poor Resident / workers ratio in underperforming towns such as Buncrana, with potential Policy/Objectives arising from the same.
- (xii) Review the nature and scale of Businesses being facilitated under Policies ED-P-5, ED-P-6 and ED-P-7 to ensure consistency with the ambition to improve the vitality and viability of more compact towns and villages and to transition towards net zero carbon emissions.
- (xiii) Access to be provided to the Evidence Base (Socio – Economic Study) referenced in Chapter 8.
- (xiv) Chapter 8.1.3.2 be reviewed to reflect the Publication of the Consultation Document on the All Island Rail Review, and thereafter set out Donegal’s ambition / longer term policy objective(s) with regard to future Rail provision in the County, beyond the lifetime of this Plan period.
- (xv) Chapter 8 be reviewed to address the Regional ambition contained within the RSES which includes reference to a feasibility study on Killybegs Port, its role, and potential to achieve a status beyond its current designation as Tier 3 – Port of Regional Significance
- (xvi) Chapter 8 be amended (Tables at 8.1 (Roads) and 8.2 (Greenways) to allocate a status to each project, and an estimate on timelines. It is suggested where a precise timeline cannot be provided then a Scheme could be classified as deliverable in either the Short / Medium / Long Term.
- (xvii) Chapter 8 be amended in respect of Policy TP-17, in respect of the 9 Letterkenny commuter settlements identified, with a Park / Ride Share Hub subject to a feasibility study, which is to be delivered in the Short Term (e.g. within 12 months of Plan adoption) with a series of Actions arising to potentially be given effect within this Plan period.
- (xviii) The Plan is amended to include further elaboration on extractive industries (Sec. 9.2) to give consideration to mapping area’s of aggregate potential, in line with the Quarry Guidelines of 2004.
- (xix) The Plan be revised to take into account Regional and National ambitions in respect of the Bio-Economy, having regard to the National Statement and RPOs 4.27, 4.28 & 4.29.
- (xx) Chapter 10.2 be revised to incorporate a clear time-line on the delivery of the Review of Tourist assets, and the priorities for investment be afforded a similar roadmap for phased delivery.
- (xxi) Chapter 14 be reviewed to consider incorporating any applicable findings related to the NWRAs publication on Designated Marine Area Plans (DMAPs), referenced at P.12 above.

- (xxii) The Plan be reviewed in the Context of SMART Regions / SMART Towns, to reflect Sec. 6.4 of the RSES.

I trust that the above recommendations and observations are of assistance and the Assembly wish to thank the 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**