

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 1

CORE DOCUMENT

OCTOBER 2009



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Introduction

1.0 Background

The Letterkenny & Environs Development Plan and associated Environmental Report is a statement of policy that sets a framework for the future growth and development of the town over the period 2009-2015. In particular, the role of the development plan is to set out a vision and growth strategy for the town, to identify areas and zones that are suitable for development, to set out policies that will guide the manner in which development is carried out and to clarify proposals including planned projects in the area.

1.1 Legal framework

The Letterkenny & Environs Development Plan is prepared in accordance with the following legislative frameworks:

- The Planning & Development Acts 2000-2007.
- Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004).
- Article 6 of the EU Habitats Directive (92/43/EEC).

Letterkenny Town Council and Donegal County Council jointly published notice on 20th September 2007 (section 9 & 11 P & D Act 2000 refers), of their intent to review the Letterkenny & Environs Development Plan 2003-2009 (as varied) and prepare a new plan for Letterkenny and its environs. A period for written submissions and observations followed during 24th September - 23rd November 2007. Substantial measures to facilitate consultation were carried out as follows: -

1. Preparation and wide circulation of Issues Paper.
2. Media coverage to promote the project and events.
3. Mail shot to approximately 200 community, voluntary & local groups.
4. Mail shot to approximately 150 service providers.
5. Mail shot to approximately 800 businesses in the plan area.
6. Two public drop-in days.
7. A service provider workshop.
8. A business breakfast.

As a result, 83 written submissions were received and a Manager's Report was prepared and submitted to the Members of Letterkenny Town Council and Donegal County Council for their consideration. The Members resolved to accept the recommendations contained in the Manager's Report and provided a number of additional directions on policies to be contained in the draft Development Plan. Subsequent meetings of the Councils were convened to consider submissions to the Draft Plan and Material Alterations were recommended for further consultation over the summer of 2009. The Councils resolved to adopt the plan at meetings of both Councils in September 2009.

In accordance with the requirements of the Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), the draft plan consists of an Environmental Report outlining the significant effects of the plan on the environment and any such mitigating measures that are required to minimise the effects. Mitigating measures identified through the strategic environmental process are incorporated into this draft plan.

1.2 Interpretation

Unless otherwise stated, 'the Councils' means Letterkenny Town Council and Donegal County Council.

1.3 Content of the plan

The development plan contains a written statement and associated land use zoning map and an Environmental Report of the significant effects of the plan on the environment. In the event of discrepancies between the written statement and the land use-zoning map, the written statement shall take precedence. The area to which the plan relates is that which is identified as the plan boundary on the land use zoning map that accompanies the text.

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PART A

Strategic context

1.0 Current Trends and issues

The context of the Letterkenny and Environs Development Plan has changed dramatically since the preparation and adoption of the previous development plan in 2003. Of significant relevance is the rapid rate of development within the plan area and in particular the growth in the retail sector within the town centre. Furthermore, the identification of Letterkenny as a linked gateway with Derry in the National Spatial Strategy, 2002, provides a clear regional role for the town in terms of building critical mass and establishing itself as the engine of growth for the region. The targets associated with identification of Letterkenny as a linked Gateway are focused on the achievement of a quality urban form and structure.

1.1 Policy Context

1.11 Background

This section sets out the policy context and hierarchy of plans and programmes (at national, regional and local level) within which the Letterkenny & Environs Development Plan 2009-2015 is prepared and with which consistency in policies and objectives is achieved. The following pages give a brief synopsis of each plan or programme and in particular identify the status or reference to Letterkenny.

1.1.2 National

At a national level the following plans and programmes are relevant:

- **National Spatial Strategy 2002**

The National Spatial Strategy (NSS), launched by Government in November 2002 sets out a strategic vision for the spatial development of Ireland over a 20-year period. The key aim of the NSS is to achieve regional balance in terms of physical, social and economic development by identifying a tiered national settlement structure designed to promote adequate opportunities for each region to develop to its full potential. At the highest level, the NSS identifies Gateways followed by hubs within each region which are defined as centres, or in the case of linked Gateways, as corridors, where the creation of a critical mass and suitable infrastructure will be of paramount importance in driving the development and prosperity of each of the regions.

Within the NSS, Letterkenny has been identified as a linked Gateway with Derry and is defined as a high priority development corridor of national, regional, local and cross-border economic importance. To this end, the development of a strategic transport corridor between the two settlements is not only important in strengthening cross-border links but also in enhancing the region's links with the island's other major growth centres such as Dublin and Belfast. These infrastructural improvements will be essential in attracting investment to the region. Population projections within the NSS, indicate a population in Letterkenny of +35,000 people by 2020.

While the NSS identifies Gateways and Hubs as the main centres for more intensive investment and development, it also outlines the importance of maintaining an intra-regional balance through the continued support of “County and Other Towns” and at a rural area level, implemented at a sub regional level. In the case of County Donegal, it will be important that the anticipated growth of the Letterkenny - Derry axis be complimented by balanced and suitable development policies that maintain the prosperity of smaller settlements countywide.

- **National Development Plan 2007-2013**

The National Development Plan 2007- 2013 ‘Transforming Ireland - A Better Quality of Life For All’ reinforces the key themes of the 2000-2006 NDP and is underpinned by the aims of promoting sustainable economic growth, greater social inclusion and balanced regional development.

The key role of the National Development Plan is to manage the investment of funds in plans and programmes in a way that supports the key strategic objectives of the National Spatial Strategy. In comparison to the €57 billion invested during the course of the NDP 2000-2006, the current National Development Plan represents the most ambitious funding programme ever proposed for Ireland and proposes the investment of some €184 billion in five investment priorities of (1) economic infrastructure (2) enterprise, science and innovation (3) human capital (4) social infrastructure and (5) social inclusion. Specifically, the National Development Plan 2007- 2013 will address investment in the promotion of the nine designated Gateway centres identified in the NSS, including the linked Gateway of Letterkenny-Derry through the establishment of the Gateway Innovation Fund.

As one of the designated Gateways that could benefit from this funding, the National Development Plan recognises the Letterkenny-Derry corridor as the critical Gateway for the Northwest. The Plan acknowledges the potential that Letterkenny offers in terms of its rapidly growing population, an expanding retail and local services sector, the Letterkenny Institute of Technology, an extensive and diversified local enterprise base, and a wide hinterland.

Though the National Development Plan seeks to realise the potential of the Letterkenny-Derry Gateway to attract major inward investment and become the chief growth centre of the Northwest, it also acknowledges the unique development challenges that this cross-border development corridor will present. These development challenges ‘include finalising and implementing an agreed strategic development framework for the Northwest Gateway, enhancing accessibility in an integrated manner through investment on both sides of the border, development of public services on either side of the border in a complementary manner and of a shared strategy for enhancing research and development capacity in the Northwest, building on the capabilities of the existing third level institutes in both jurisdictions’.

The National Development Plan indicates some of the key initial development issues and investment requirements over the period of the Plan including:

- Implementation, by the relevant local authorities, of an integrated strategy for the strategic development of Letterkenny as an integral part of the Northwest Gateway;
- Enhancement of road links to other Gateways along the Atlantic Road Corridor;
- Further improvements on the N2 route, in co-operation with the Northern Ireland Authorities, to greatly improve the road link to Dublin over the period of the Plan;

- Further investment at Derry Airport and continued support for Donegal Regional Airport;
- Enhancement of the capacity and resilience of energy supply networks;
- Strengthening the innovation capacity at Letterkenny Institute of Technology and building on complementary strengths at Magee College in Derry;
- Initiatives to deepen the skills base of the labour force in order to facilitate the creation and attraction of higher value-added enterprise functions;
- Improvements to the stock of healthcare and social infrastructure such as regional hospital and specialist care services on a shared basis between Donegal and facilities in Northern Ireland.

- **National Policy Guidelines**

The Department of the Environment, Heritage and Local Government have prepared a number of national policy guidelines aimed at providing guidance for Planning Authorities on a wide range of planning issues. The Letterkenny & Environs Development Plan shall have regard to the Department of Environment, Heritage and Local Government Guidelines. In particular, the most recently published Planning Guidelines on Sustainable Residential Development in Urban Areas and the Best Practice Urban Design Manual are relevant. The comprehensive list of published guidelines reads as follows:

- Quality Housing for Sustainable Communities, Best Practise Guidelines for Delivering Homes, Sustainable Communities, 2007
- Planning Guidelines on Sustainable Residential Development in Urban Areas, May 2009
- Best Practice Urban Design Manual, February 2008
- Architectural Heritage Protection Guidelines, 2004
- Architectural Heritage Protection Guidelines for Places of Public Worship, 2004
- Childcare Facilities Guidelines, 2000
- Design Standards for New Apartments, September 2007
- Development Management Guidelines, June 2007
- Development Contribution Scheme for Planning Authorities, 2003
- Development Plans - Guidelines for Planning Authorities, 2007
- Implementing Regional Planning Guidelines - Best Practice Guidelines, 2005
- Draft Guidelines on Landscape and Landscape Assessment, 2000
- Quarries and Ancillary Activities, 2006
- Retail Planning Guidelines, 2000 (amended 2005)
- Strategic Environmental Assessment, 2004
- Sustainable Rural Housing, 2005
- Telecommunications Antennae and Support Structures, 1996
- Wind Energy Development Guidelines
- Taking in Charge of Housing Estates/Management Companies, 2006

- **Shaping our Future 2025**

'Shaping Our Future' is the overarching regional development strategy for Northern Ireland and is comparable to the National Spatial Strategy on a number of fundamental aims namely:

1. To promote balanced regional development and reduce socio- economic disparities between regions.
2. To encourage an integrated approach to social, physical and economic cross border linkages in achieving economic prosperity.

In particular, 'Shaping Our Future' recognises the need to strengthen and promote the role of Derry as the economic centre and focal point of the northwest development corridor. The strategy considers this as a means of achieving balanced spatial development within Northern Ireland itself at an intra regional level. However, the strategy recognises the role of Letterkenny and the importance of developing cross border linkages in order to achieve mutually beneficial effects at an inter-regional level.

1.1.3 Regional

At a regional level the following plans and programmes are relevant:

- **Border Regional Planning Guidelines**

The Border Regional Authority was established to promote the socio-economic prosperity of the region through the coordination of local authority activities in the border counties of Donegal, Leitrim, Sligo, Monaghan, Cavan and Louth.

The Border Regional Planning Guidelines are designed to ensure the future socio-economic prosperity and competitiveness of the region. They also seek to ensure that the future development of the region is carried out in a manner that is sustainable and is compatible with the broader national strategic objectives as outlined in the National Spatial Strategy.

In response to the spatial objectives of the NSS, the Border Regional Planning Guidelines have established a more detailed settlement structure that is set within a regional context. It is a settlement structure that places emphasis on a preferred development scenario of maintaining and creating 'strong urban structures and sustainable rural areas' within the region.

Within this regional settlement hierarchy, and in line with the NSS, the Letterkenny-Derry corridor has been identified as a top tier Gateway; a strategically placed, national scale urban area and a key element for "delivering a more spatially balanced Ireland and driving development in the region". The guidelines highlight the quality of Letterkenny in its own right, its rich cultural and environmental setting, its role as the employment and retailing centre of County Donegal and its high standard of educational and healthcare facilities. However, the guidelines emphasise that it is the coordination of infrastructural development with Derry and the enhancement of a critical mass between the two settlements that will be vital in ensuring the future prosperity of Letterkenny town and in energising the wider Donegal and North Western area of the region.

1.14 Local

At a local level, the following plans and programmes are relevant:

- **County Donegal Development Plan 2006 - 2012**

In line with the NSS and the Border Regional Planning Guidelines, the County Donegal Development Plan 2006- 2012 established a tiered countywide spatial settlement structure that seeks to build upon the NSS identification of Letterkenny - Derry as a linked Gateway, whilst actively promoting balanced countywide development through the adoption of policies that seek to maintain and enhance the prosperity of smaller settlements countywide.

The County Plan details a multi-level sub-regional settlement strategy based on the following hierarchy:

- Letterkenny-Derry Gateway.
- Medium and small sized towns (Urban Strengthening.)
- Towns and villages in proximity to Gateways (Urban Support).
- Smaller towns and villages.
- Gaeltacht towns and villages (Urban Support).
- Special Function towns.

The County Donegal Development Plan 2006 - 2012 identifies Letterkenny as the top tier linked Gateway centre of retail, commercial and service activities within the County and adopts a strategy of limited nodal development along the Gateway Transportation Corridor at a number of pre- defined locations. The County Donegal Development Plan 2006 - 2012 states that the creation of 'a vibrant and fully functioning linked Gateway will provide the momentum to drive the development of the entire County with spin offs and advantages that will flow throughout the County and filter down through the Urban-Rural hierarchy to positively impact on all areas.'

The County Donegal Development Plan 2006 - 2012 specifically indicates that the creation of such a Gateway would provide for:

- A centre which will be able to compete at a regional level.
- A focal point for investment and employment in the County.
- An efficient public transport system.
- Viable educational, health and social services of regional importance.
- A well developed retail environment.
- A vibrant and regionally important entertainment and cultural sector.
- Strategic links with Northern Ireland.

• **An Stratéis, Donegal County Implementation Plan 2002-2012**

Donegal County Development Board (CDB) published An Stratéis, Donegal County Implementation Plan 2002 - 2012 representing a new County strategy for economic, social and cultural development to 2012. The County Development Board oversee the implementation of An Stratéis through the various lead agencies so as to advance and co-ordinate development of all types in the county in an integrated manner. An Stratéis sets out and prioritises options for development, identifying roles and responsibilities involved and targets including timescales. The strategy is focused on the areas of the Productive Sector, Human Resources, Cultural & Social Inclusion, Social and Economic Infrastructure.

1.2 Population & Socio-economic context

An analysis of population entitled 'Background Population Paper,' February 2008, prepared by the Central Planning Unit, informs the Letterkenny & Environs Development Plan. This analysis demonstrates that the population of the geographical area of the development plan is 19,363 persons in 2006 and that the plan area has experienced a 21.6% population increase during the period 2002-2006. This rate of growth is remarkable when set against the growth trends in population at the national (8%), regional (9%) and county (7%) level. The growth rate 2002 - 2006 demonstrates a strong urban structure and the increasing regional importance of Letterkenny as a centre to live, work and invest in.

In terms of population projections, the Border Regional Planning Guidelines, 2004, indicated a projected population for the Letterkenny Gateway of 35,000 to 2020 and revised population figures prepared by the Border Regional Authority in 2007, project a higher figure of 36,956 by 2020. The 'Background Population Paper', February

2008 prepared by the Central Planning Unit, demonstrated that, on the basis of continuing trends within the development plan boundary, the population is projected to be in the region of 36,000 - 39,000 by 2020. Therefore, the growth strategy makes provision for adequate land supply to cater for this projected population in such a manner so as to achieve quality urban environments based on the concepts of identifying and strengthening neighbourhoods.

Taking the projections, this means that there will be a need for around 3700 new housing units within the life of the plan to 2015 and a need for a further additional 2875 new housing units to 2020.

Other significant Key population indicators are: -

- Age cohorts showing the highest % of the total existing population are 20-24 years, 25-29 years, 30-34 years indicating potential for increased birth rates over the coming 10 years.
- Letterkenny experienced a higher than average in- migration level during the period 2002 - 2006 at 87% of the total population increase demonstrating a diverse and changing demography.
- In the year 2005 - 2006, 2,564 people moved into Letterkenny from the County, Country and abroad.
- A total of 4229 people within the Letterkenny Plan area were born outside of Ireland.
- Dependency ratio of 2.2:1 workers (compared to national ratio of 2.25:1 worker).
- Unemployment rate of 4.9% compared to national rate of 4.3%. (EU average unemployment rate of 7.9% and Northern Ireland unemployment rate of 6.7%)
- Average household size within the plan area is 2.92 persons per household.

The growing population and increase in residential development has placed significant pressures on the existing network of social and community facilities within the town. Taking childcare, recreation, leisure, health, and education into account as examples, the provision of social and community facilities has not occurred at a rate in tandem with the growing population. The document entitled 'Under the Spotlight- A Growing Family in a Growing Town,' North Western Health Board & Donegal County Childcare Committee, 2004 sets out results of consultations with children, young people, parents, service providers, immigrants and the travelling community in the context of preparing a blueprint for the type of community that families want to be part of in Letterkenny. Across the consultations the results indicated that there were common objectives that need to be achieved including the establishment of an effective town bus service, ready access to childcare, children's facilities such as play grounds, facilities for young people and the aspiration to feel safe within the community. The results emulate the feedback from the public consultation process at pre- draft stage in respect of the development plan and are focused on 'quality of life' issues which are central in the objective to strengthen neighbourhoods.

In relation to the economic content, the national workforce has grown immensely in the last number of years and there are now over 2 million people in employment in Ireland. Ireland's unemployment rate stood at 5.7% in June 2008, which is still lower than the EU 27 average of 7.9%, but has grown from 4.8% at the turn of the year. The Central Statistics Office (CSO) collates monthly reviews of the numbers on the live register, the figures for the Border region show a considerable increase, rising from a low of 21,526 in June 2006 to a high of 31,801 in June 2008. The male population accounts for the vast majority of this increase where from June 2006 to June 2008 there has been an increase of 6,373 males on the live register compared

to an increase of only 3902 females for the same period. This can be attributed to the slowdown in the Irish construction sector, employment within which hit its lowest figure in May 2008 of only 92,600 employees since December 1999, compared to a seasonal high of 113,000 in July 2006 and 111,100 people in May 2007.

Letterkenny has been subject to substantial economic growth over the period of the last plan 2003-2009; this growth has come in tandem with the dramatic changes in population for the same period. In February 2008, the unemployment rate in Letterkenny was 4.8% which was in line with the national average, however the wider regional context showed that unemployment was 12.9% in 2006, the second highest in the country. According to CSO data published in 2008, Donegal has the lowest disposable income per capita at 82.1% of the national average. This data is not available for Letterkenny Town level. Although Letterkenny is identified as a Gateway for the generation of critical mass, the current economic slow down may impact upon the opportunities for the town to reach the prescribed population targets as set out in the NSS and Regional Planning Guidelines.

This is in part due to the high level of in-migration required to maintain these levels of growth. In-migration accounted for 87% of the population increase in Letterkenny for the period 2002-2006 (Background Population Paper, CPU, 2008) In-migration includes all movements from within the county, region, nation and non-nationals into the area of Letterkenny. Non-nationals accounted for 49% of the increase in the national workforce in the period 2002-2006. However, with increasing unemployment levels and continued instability in both the housing and construction markets the high levels of in-migration may not be sustainable.

1.3 Physical development and trends

In the general context, the physical development trends experienced in the town since adoption of the 2003 development plan have been the continued rapid rate of development both in the town centre and the environs of the town.

The rate of development is most evidenced within the town centre with significant increases in existing and permitted retail floorspace in the main provided for in lands east of Pearse Road. As a result, Letterkenny is now firmly established as a competitive retail centre for the region offering both the independent stores with smaller floorspace and the larger multi-national stores. The trend in new retail activity has however, been largely car dependant which as a result has undermined the town centre experience and exasperated the distinction between the new retail sector and the long established retail sector.

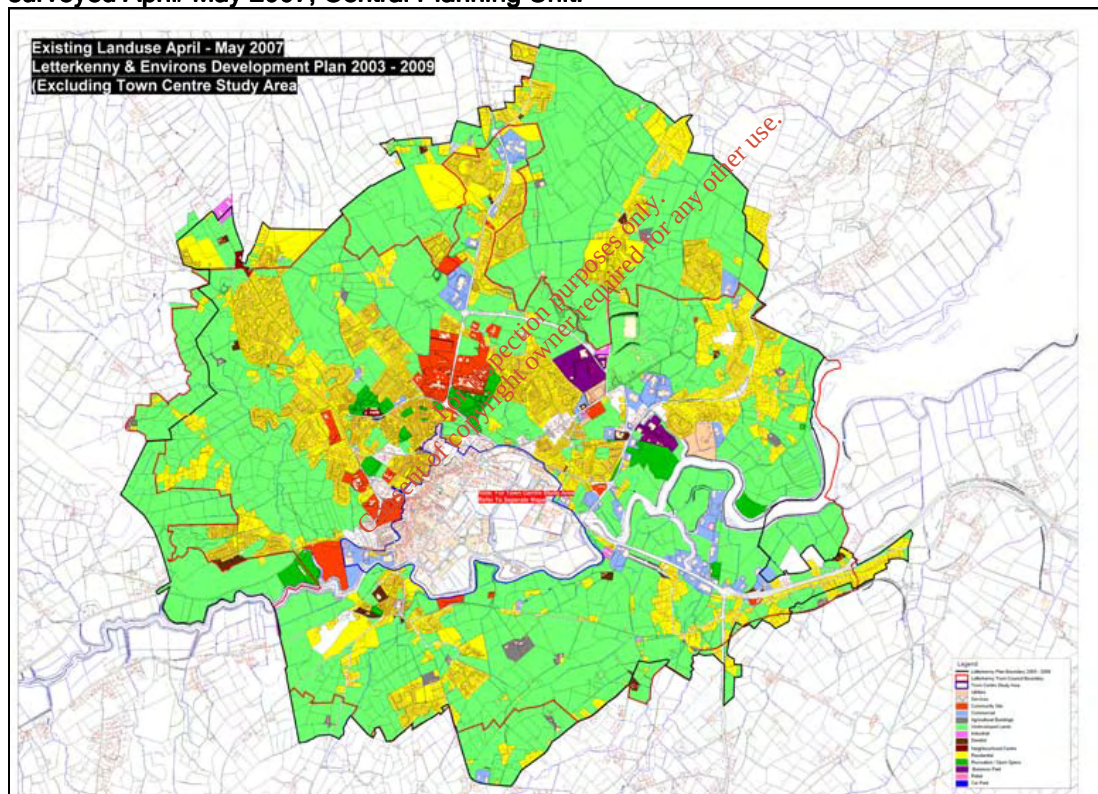
Multiple residential development continues to grow, particularly in the environs of the town and makes up some 73% of the total developed land in the town (excluding town centre). The concentration of this multiple residential development has been focused along the arterial routes into the town in the areas of Glencar Scotch, Glencar Irish, Mountain Top, Lisnenan and Ballymacool. As a result, there are significant strips of undeveloped lands intervening development along the arterial routes where access to and the unlocking of these lands has become a significant and growing difficulty. In addition, that rate of growth in new housing units has not been in parallel with the necessary level of physical and social infrastructure that would be associated with the delivery of strong neighbourhoods. The development trend in the residential sector has therefore been to supply large areas of new housing in the absence of the physical and social infrastructure resulting in a weak neighbourhood structure in the environs of the town.

There is a 45% take-up of zoned 'residential' land, both existing and permitted but not yet constructed within the plan area and therefore there is at least a surplus of 55% of 'residential' land over and above quantified need.

A total of 11% of the total land developed in the town (excluding town centre) is currently being used for the purposes of economic activity (commercial, industrial, business) and significant areas of zoned 'General Employment' land remain undeveloped. The physical development trends in relation to economic development show that there is a weak structure in terms of business districts set against a strong presence of individual employment generating developments. The coordination of economic activities so as to provide business districts that offer the integration of employment and social infrastructure represents a key challenge to the Councils.

The amount of undeveloped land within the plan area comprises some 613 hectares representing 63% of the total plan area and therein affording real opportunities to consolidate, integrate and strengthen neighbourhoods.

The drawing below shows the spatial distribution of existing land uses within the plan area, surveyed April/ May 2007, Central Planning Unit.



1.4 Key Issues

The key issues to be addressed in the plan are:

- Consolidation of the town centre and the need for a clear town centre strategy focusing on the delivery of quality urban form.
- The need to plan against urban sprawl.
- The need to strengthen neighbourhoods.
- The need to identify and provide for neighbourhood needs within a spatial context.

- The need to identify a strategy to unlock constraints on appropriately located lands that are undeveloped.
- The need to integrate open space, public realm, heritage and biodiversity into the urban structure of the town.
- The need for robust policy in terms of the economy to respond to changing conditions.

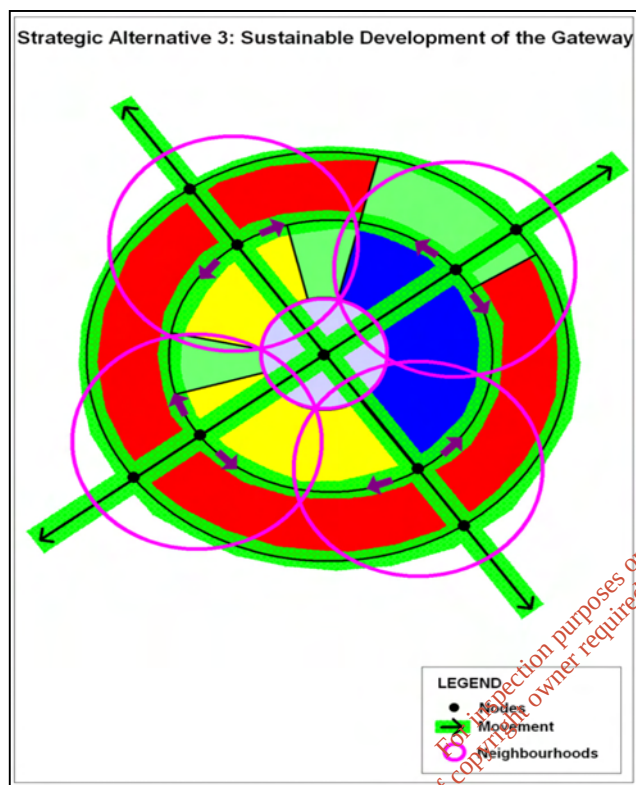
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2.0 Growth Strategy

2.1 Sustainable development of the Gateway

The growth strategy adopted in this plan is described as 'Sustainable Development of the Gateway,' and is presented in the schematic below. The Schematic shows a circle representing Letterkenny, the mid point of which is the core.



The Key Characteristics of the preferred strategy are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental and heritage resources.
- Quality of urban form.
- Vitality of services.



Essentially, the growth strategy is focused on the delivery of the quality and characteristics associated with the linked Gateway status so as to respond to the strategic regional role identified for Letterkenny - Derry in the National Spatial Strategy and to cater for the needs and aspirations of this emerging city with an anticipated future population of between 37,000 and 39,000 people by 2020. To do so, the spatial planning framework provided for in this plan, promotes the growth and development of Letterkenny, provides the environment to build and strengthen the population, promotes a quality of life agenda, provides for sustainable economic opportunities and attractiveness to investors and harnesses environmental resources in a balanced and sustainable manner.

Four key principles underpin this growth strategy and each principle is focused on the strategic role of Letterkenny as a linked Gateway with Derry. The key principles guide the overarching aim of the plan set out on the following page and the subsequent strategic objectives and are a measure against which objectives and policies can be formulated and tested. The key principles are:

Consolidation

Making best use of existing land uses and resources.

Integration

The coordination of land use relationships that provide for linkages, permeability, compatibility and sustainability in new and future development.

Vitality

Ease of access to a range and quality of land uses, services and facilities providing for attractive places to live, work and invest.

Quality

Promotion of design excellence in the creation of built environments that are distinctive and attractive.

To inform the growth strategy, a neighbourhood analysis has been carried out, firstly to establish a baseline of the existing neighbourhoods within Letterkenny and their characteristics and secondly, to identify and prioritise the future emerging neighbourhoods. In addition, the analysis identifies a neighbourhood strategy that focuses on the integration and connectivity between neighbourhoods and within neighbourhoods and the servicing of neighbourhoods in terms of social, community and economic infrastructure. This analysis is demonstrated both within the written objectives of the plan and within the spatial planning framework set out on the accompanying mapping that accompanies the plan and is underpinned by the four key principles of **consolidation, integration, vitality and quality**.

The growth strategy aims to make provision for the anticipated level of population increase both over the life of the plan and furthermore to 2020. Population projections indicate a population by 2020 in the region of 36,000 - 39,000. Therefore, the growth strategy makes provision for adequate land supply to cater for this projected population in such a manner so as to achieve quality urban environments based on the concepts of identifying and strengthening neighbourhoods. To quantify, the population projections indicate that need for new housing units over the life of the plan (to 2015) is 3700 new units and an additional 2875 further units will be required to 2020 to cater for projected future growth.

2.2 Plan Aim

The overarching aim of the plan is as follows:

To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social & cultural activities.

2.3 Strategic Objectives

The strategic objectives of the plan are as follows:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.



Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.

Strategic Objective 4:

To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.

Strategic Objective 5:

To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.

Strategic Objective 6:

To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.

Strategic Objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

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PART B

Policies & objectives

1.0 General location & pattern of development

The zoning objectives should be read in conjunction with the wider policies contained in this plan and with the land use-zoning map that accompanies this written text. The zoning classifications are divided into sole and primary use. Applications for development which would not inhibit the primary use will be considered on their merits and permission may be granted where the Planning Authority considers that the proposed use or development would not be detrimental to the primary use objective for that area and that it would conform to proper planning and design principles

Established Development:

To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement.

Strategic Community Opportunity:

To achieve a mix of health, social and community development which may include hospital expansion, community, health, childcare facilities, affordable housing, community support housing in accordance with policy CF2 at part 2, section 4.4 of this plan.

Community Facilities:

To reserve land for community and institutional, cultural, recreational, healthcare and amenity purposes.

Town Centre:

To sustain and strengthen the core of Letterkenny as a centre of commercial, retail, cultural and community life.

Primarily Residential:

To reserve land primarily for residential development.

Strategic Residential Reserve:

To reserve land for residential development as a long term strategic landbank.

General Employment:

To reserve land for commercial, industrial and non- retail purposes.

Commercial:

To reserve land predominantly for commercial use.

Opportunity Sites:

To identify lands with specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area whilst recognising features of importance that are specific to the site.

Education:

To reserve land for educational purposes, may include ancillary recreational and childcare facilities.



Open Space:

To conserve and enhance land for formal and informal open space and amenity purposes, and to make provision for new recreation, leisure and community facilities.

Local Environment:

To provide for limited development only ensuring negative impact on the landscape setting and the biodiversity quality of the area. (Policy NE2 refers).

Flood risk area:

To identify an area that will be carefully managed so as to protect the flood plain and avoid exacerbation of flood risk.

Services:

To reserve land for provision of infrastructure and services.

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2.0 Developing Neighbourhoods Through Urban Design

2.1 Introduction

The development of sustainable neighbourhoods within Letterkenny forms an integral component of the plan strategy. This chapter sets out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan which state:

Strategic objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

2.2 Background

What defines a sustainable neighbourhood?

A sustainable neighbourhood is one which uses land efficiently in tandem with high quality urban design and public realm and which ensures effective integration in the provision of physical and social infrastructure. As a result, places are created in which people want to live.

This means that the characteristics of a sustainable neighbourhood comprise not only the physical environment but also includes the delivery of a successful social and community environment. In other words, sustainability includes creating safe and attractive places where there is a clear sense of community together with the necessary social and community infrastructure such as schools, healthcare, neighbourhood centres, childcare and open space as examples.

2.3 Objectives relating to developing neighbourhoods through urban design:

The objectives in relation to developing neighbourhoods in Letterkenny through urban design are:

- To achieve the aims of consolidation, integration, vitality and quality.
- To develop a strategic framework extending from strategic neighbourhood level to local level so as to guide new development.
- To develop sustainable neighbourhoods that are quality places to live.
- To reduce negative impacts on the environment through improved permeability and accessibility within the urban form.
- To harness the urban form in a manner that engages and acknowledges the quality of existing built fabric and which provides opportunity for new and innovative built form including the preparation of a Character Appraisal of the 'Historic Streetscape' of Letterkenny.

2.4 Existing neighbourhoods within Letterkenny

Eight neighbourhoods have been identified as existing in Letterkenny at present. The neighbourhoods have been identified as areas where there is some level of commonality within them. Outside the eight identified neighbourhoods, there are



lands with existing development which are not identified as neighbourhoods due to the sporadic manner in which they exist at present. Each of the existing neighbourhoods varies in terms of how successful they perform as a sustainable neighbourhood as a result of various factors such as natural topographical constraints, maturity of a neighbourhood, range of services and facilities provided at a local level, existing access arrangements. The eight existing neighbourhoods are the town centre, Glebe/Kiltoy, Lisnenan, Carnamuggagh, Glencar Scotch, Glencar Irish, Ballymacool and Oldtown.

Map no. 1 'Existing Neighbourhoods in Letterkenny' demonstrates the existing neighbourhoods and identifies some of the existing key characteristics of each neighbourhood. The information on the table on the following page sets out the characteristics of each neighbourhood and makes a judgement as to how successful the neighbourhood is. Note that the town centre neighbourhood is analysed separately in Part B, Section 7.0 relating to 'Town Centre.'



Existing neighbourhoods: Glebe/Kiltoy, Lisnenan & Carnamuggagh.

Name:	Glebe/Kiltoy	Lisnenan	Carnamuggagh
Neighbourhood form:	Sporadic low-density neighbourhood of predominantly residential properties significant proportion of which are single houses.	Linear residential neighbourhood.	Linear neighbourhood of residential and commercial activity.
Approx no. of residential properties:	800	250	930
Approx no. of commercial properties:	20	0	20
Approx existing population:	2350	700	2700
Approx density:	Low	Medium	Medium
Key characteristics:	Eastern section located adjacent to River Swilly SAC and significant lands to the south located within the Swilly Flood Risk Area. Heavily wooded area at Kiltoy Woods NHA. Location of Aughninshin Abbey. Sewerage treatment works located at Magheranen. Ramelton Road a regional road with heavy traffic volumes particularly at peak times. Steep gradients in Kiltoy area. Permeability weak.	Highly elevated (gradient increasing in northerly direction). Predominantly residential neighbourhood dependant on single access(Lisnenan road).Mainly cul de sac developments and single one off ribbon development. Permeability weak. Kiltoy Woods NHA located between the Lisnenan and Glebe/ Kiltoy neighbourhoods.	Highly elevated at most northern point with significant views to be had of southwards across the town. Linear form defined by the N56 which dissects the neighbourhood. Residential development in the form of cul de sac layouts. Permeability weak. Commercial element to the north providing a level of neighbourhood level facilities.
Range of neighbourhood services:	Poor with the exception of 2 childcare facilities.	Poor with the exception of 1 childcare facility.	Moderate. Local facilities located along main arterial route of N56 serving a wider town level commercial function as well as serving local needs. Access to these services constrained due to their location along

Name:	Glebe/Kiltoy	Lisnenan	Carnamuggagh
			the heavily trafficked N56. Planning permission granted for secondary level Gaelscoile.
Quality of urban environment	Rural character at Glebe area. Kiltoy Woods breaks urban environment. Large scale cul de sac development at Kiltoy lacking community character.	Large scale cul de sac development at Kiltoy lacking community character. Unattractive environment for walking, cycling. Linear ribbon form results in lack of sense of place. Significant views to be had southwards across the town.	Linear development defined by N56. Perception of neighbourhood with high vitality due to mix of uses. Poor public realm environment around the neighbourhood facilities. Significant views to be had southwards across the town.
Neighbourhood structure:	Weak. Physical distance from town centre, lack of permeability and lack of neighbourhood facilities result in an isolated neighbourhood with high dependency on car usage for daily conveniences.	Weak. Physical distance from town centre, lack of permeability and lack of neighbourhood facilities result in an isolated neighbourhood with high dependency on car usage for daily conveniences.	Weak. Permeability weak therefore access to neighbourhood facilities on foot restricted to N56 representing unattractive route due to distance incurred and steep gradient.

(Table above continued from previous page).

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Existing neighbourhoods: Glencar Scotch, Glencar Irish, Ballymacool, Oldtown

Name:	Glencar Scotch	Glencar Irish	Ballymacool	Oldtown
Neighbourhood form:	Linear, closed cells.	Long established neighbourhood with reasonable permeability.	A developing neighbourhood with predominantly residential uses and increasingly an area of sport and recreation.	Established Oldtown area on the edge of the town centre extended through new developed cul de sac residential areas south.
Approx no. of residential properties:	750	1900	360	600
Approx no. of commercial properties:	2	40	4	10
Approx existing population:	2200	5600	1050	1750
Approx density:	Medium	Medium-High	Medium	Medium
Key characteristics:	Highly elevated plateau lands. Remote from town centre. Distinct from Glencar Irish due band of undeveloped lands and heavy vegetation. Lands fall in gradient significantly to the south west.	Located on town centre edge and consisting of long established residential properties in the main integrated with a strong range of neighbourhood level facilities and amenities. Permeability high in parts.	Landlocked neighbourhood in terms of natural environmental: Rodgers Burn, Drum Hill, Whinney Hill, River Swilly, Ballymacool Woods. Mix of uses predominantly residential, sport and recreation.	Established Oldtown area located on low lying lands on edge of town centre and adjacent to River Swilly. Steep gradients to the south of the neighbourhood providing significant views across the north of the town. Dissected by a river tributary. Convergence of the neighbourhood on one access point over the River at Oldtown Bridge.
Range of neighbourhood services:	Moderate. 1 childcare facility and 1 neighbourhood centre.	High. Including Ballyboe Park, green spaces, children's play areas, recreational pitches.	Moderate. Concentration of sport and recreational uses including leisure centre, O'Donnell Park. newly	Weak. Limited to green spaces within housing developments and also to a recreational pitch at established Oldtown. The established Oldtown area

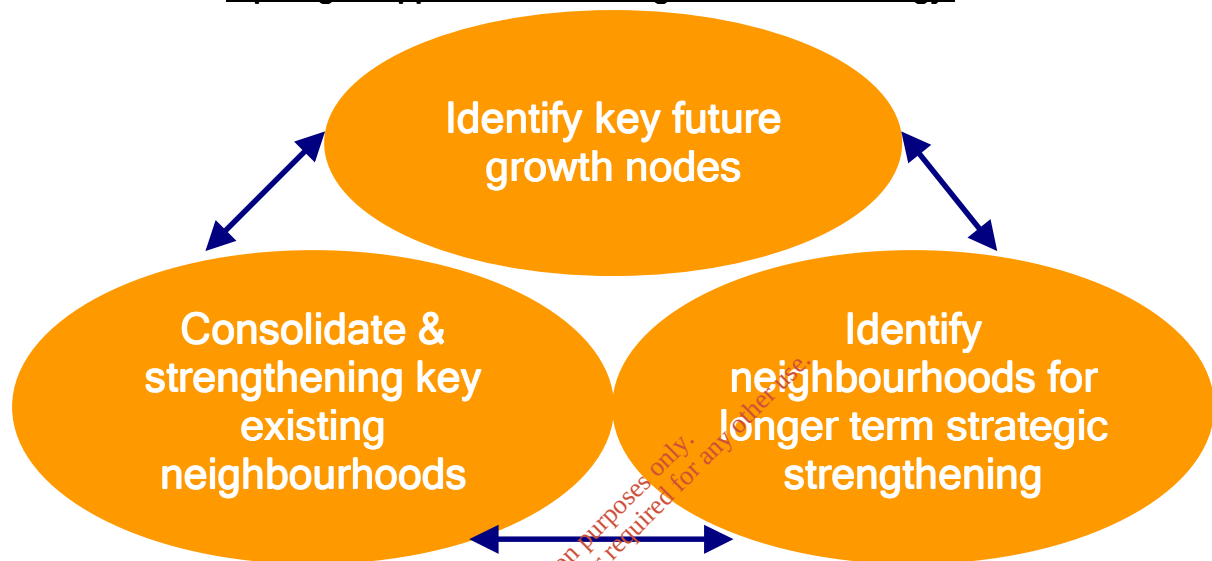
Name:	Glencar Scotch	Glencar Irish	Ballymacool	Oldtown
		community group buildings, schools, churches, neighbourhood centres.	developing town park. Planning permission has been granted within the neighbourhood for retail unit that represents a neighbourhood facility.	is located close to the town centre which supplies a significant level of the local neighbourhood facilities.
Quality of urban environment	No identifiable public realm. Housing layouts in scale and design are such diminish a sense of place.	Identifiable public spaces that contribute to sense of identify and character. Quality urban environment through established and mature nature of residential areas.	Urban environment designated by the dissection of the residential uses and sport & recreation uses by the Regional Road (R250). Residential development is of a cul de sac form. Permeability weak in terms of the dissection of the neighbourhood by the R250.	Mixed urban environment of mature quality providing a degree of permeability through a network of streets. Residential developments to the south consist of cul de sac form. Difficulties with access by foot due to gradients and distance from neighbourhood facilities.
Neighbourhood structure:	Moderate. Neighbourhood centre located at most northerly point of the neighbourhood therefore integration of this facility is poor.	Strong. Full range of neighbourhood facilities, high level of permeability in parts coupled with the proximity to the town centre result in a strong sustainable neighbourhood structure.	Moderate. Elements of a strong neighbourhood in terms of the supply of recreational neighbourhood facilities.	Weak. Neighbourhood facilities serving the area are located primarily within the town centre rather than within the Oldtown neighbourhood.

(Table above from previous page).

2.5 Neighbourhood Strategy: Breakdown of Key Growth Nodes

A three pronged approach to the neighbourhood strategy has been adopted so as to comply with the growth strategy set out at Part A, Section 2.0 of this plan. In particular, the neighbourhood strategy recognises the aim to achieve consolidation, integration, vitality and quality. The strategy is illustrated below and involves (i) the consolidation and strengthening of key existing neighbourhoods (ii) The identification of key future growth nodes and (iii) the identification of neighbourhoods for longer term strategic strengthening.

3 pronged approach to the neighbourhood strategy.



This means that in order to deliver the consolidation, integration, vitality and quality aims of the growth strategy, the Councils recognise that the entirety of the lands within the plan area cannot be developed randomly. Instead the Neighbourhood Strategy breaks down the plan area into:

1. Existing neighbourhoods that are best placed for further strengthening in their own right and the type of strengthening that is required. The neighbourhoods are Glencar Irish Southernmost portion of Glencar Scotch, Gortlee, Ballymacool, northern portion of Oldtown, Southern lands of Carnamuggagh and Lisnenan, and Glebe/Kiltoy.
2. New key future growth nodes where there are significant opportunities to strengthen the neighbourhood form through integration of adjacent neighbourhoods to provide for greater permeability. These emerging new neighbourhoods are: South of the River Swilly at Leck/Scribbly including connections to Oldtown and the town centre, lands at Windyhall to connect Glencar Scotch, Glencar Irish and Carnamuggagh neighbourhoods, lands at Lisnenan connecting southern portions of Carnamuggagh and Lisnenan neighbourhoods.
3. Existing neighbourhoods for longer term strategic strengthening where the neighbourhood structure as it exists is weak and sporadic and where the location of the lands is on the outer fringes of the town so as to reduce the ability to consolidate and create new integration, linkages and permeability within the urban form. These neighbourhoods are lands west and north of Glencar Scotch neighbourhood, northern lands of Carnamuggagh and Lisnenan neighbourhoods, lands intervening Glencar Irish and Ballymacool

neighbourhoods, lands south of Oldtown neighbourhood and south of Scribbly/Leck emerging neighbourhood.

Map No. 2 'Neighbourhood Strategy: Breakdown of Key Growth Nodes', identifies the locations for consolidation, new growth nodes and for long term strategic strengthening.

2.6 Neighbourhood Strategy: New Neighbourhood Structure:

Map no 3 'Neighbourhood Strategy- New Neighbourhood Structure' builds on the previous assessment and as a result identifies a new neighbourhood structure which represents the strategy for neighbourhoods over the life of this plan. The town is segregated into three categories of neighbourhoods as follows:

- Key growth node neighbourhoods.
- Neighbourhoods for long term strengthening.
- Existing neighbourhood structure for retention.

This strategy identifies the urban form that informs the land use zoning framework and which will be critical in making future assessments of the specific manner in which each neighbourhood should be developed and how the development of neighbourhoods through urban design should be implemented. The Councils will assist this level of detail through the preparation of Design Briefs for the lands zoned 'Primarily Residential' within the plan area (referenced in Policy H7 at Part B, Section 3.0 of this plan, 'Housing').

In order to facilitate this ongoing process, the table on the following pages sets out a basic analysis of the future need for facilities and amenities within each 'Key Growth Node Neighbourhood' [Map no. 3 'Neighbourhood Strategy - New Neighbourhood Structure'] on the basis of the neighbourhoods being developed in one phase. It is recognised however, that this assessment is based on round figures in relation to land mass, density, percentage of population in various age cohorts, school class sizes, and that the analysis does not provide for a phased implementation. Therefore, the analysis has limitations and will be used as a guide to the level of provision that may be required in each neighbourhood. In particular, the land capacity referred to in the table on the following pages is indicative only and is not intended to prescribe the number of units permissible at any particular location. In lieu, the number of units that may be delivered at any particular location maybe higher or lower as a result of a number of factors arising through the design process including topography, the nature of the site (Brownfield/Greenfield) and the design concepts employed. As a result, through the life of the plan, it will be necessary to review the table on the following pages so as to update data on the number of units supplied in each neighbourhood and any resultant revised requirements at a neighbourhood level for associated services and amenities. Guided by this analysis, the Councils will apply the principles and guides set out in this section to developing neighbourhoods through good urban design. The quality agenda (requiring innovative and quality led layouts and design structure) together with a recognition and understanding of the importance of the existing built form is the most appropriate method of achieving integrated and sustainable neighbourhoods. This process is about setting a clear and new direction for the Gateway that establishes quality and integration at the heart of the strategy.

In addition, the analysis of need for facilities and amenities is followed by establishment of the Vision of each neighbourhood.

The table below relates to the 'Key Growth Node Neighbourhoods' as identified on Map No 3 'Neighbourhood Strategy - New Neighbourhood Structure' and is an analysis of the types of needs that would be required to be met if the growth nodes were developed to full capacity.

Key growth Node & Synopsis	Residential land capacity	No. of pre-school population & childcare places required	No. of new primary level education facilities required (teacher/ pupil ratio of 1:25, based on 8 classroom schools)	No. of new secondary level education facilities required (Catering for 1000 pupils)	Need for new neighbourhood facilities.	Need for public space	Need for linkages
Glencar Irish:	28 ha 980 units 2862 people	No. of pre- school population: 203 No. of childcare places required: 68	No of primary school population: 343 No. of classrooms: 14 New primary schools required: 2 which would have additional capacity.	No of post primary age population: 243 No. of post primary schools required: Negligible and to be taken into account with emerging new neighbourhoods.	Well served by three neighbourhood facilities.	Significant level of public open space exists in general.	High level of permeability in the area close to the town centre. Need to support new linkages to the emerging new neighbourhood north at Windyhall.
Gortlee:	6 ha additional capacity in the area of Gortlee House. 300 units 876 people	No. of pre-school population: 62 No. of childcare places required: 20	No. of primary school population: 105 No. of classrooms: 4 New primary schools: 1, which would have additional capacity.	No of post primary age population: 74 No. of post primary schools required: Negligible and to be taken into account with emerging new neighbourhoods. (NB: Permission granted for construction of Gaelscoile in this neighbourhood).	Eastern area along Ballyraine Road served by neighbourhood centres. Need for additional facilities to serve Western area.	District level provision of open space by means of the Town Park and Ballyraine linear Park. Limited interspersed pockets of open space within high density development. Need for strategic open space corridors to improve accessibility and usability.	Linkages to the Town Park to provide for ease of access and walk ability are required.
Glencar Scotch/ Windyhall:	72 ha 2520 units 7358 people	No. of pre-school population: 522 No. of childcare places required: 173	No. of primary school population: 883 No. of classrooms: 35 New primary schools: 4	No of post primary age population: 625 No. of post primary schools required: 1 which would have additional capacity	1 neighbourhood centre exists. No other facilities existing therefore full range to be provided.	No defined open space provision therefore need for identification of same and for green linkages/ public realm to provide permeability.	No existing linkages therefore full grid of linkages including hierarchy of function of linkages to be developed with a view to providing for maximum permeability.

Key growth Node & Synopsis	Residential land capacity	No. of pre-school population & childcare places required	No. of new primary level education facilities required (teacher/ pupil ratio of 1:25, based on 8 classroom schools)	No. of new secondary level education facilities required (Catering for 1000 pupils)	Need for new neighbourhood facilities.	Need for public space	Need for linkages
Camamuggagh/Lisnenan/Kiltoy:	69 ha 2415 units 7052 people	No. of pre-school population: 501 No. of childcare places required: 167	No. of primary school population: 846 No. of classrooms: 34 New primary schools: 4	No of post primary age population: 599 No. of post primary schools required: 1 which would have additional capacity.	Neighbourhood facilities located at Mountain Top but deficient elsewhere within the neighbourhood.	No active open space provision at district level. Area of Kiltoy Woods and NHA provides potential for active use of woodland. Further need for identification of defined space and for green linkages/public realm to provide permeability.	No through linkages either by private car or on foot, cycle therefore full grid of linkages including hierarchy of function of linkages to be developed with a view to providing for maximum permeability.
Ballymacool:	54 ha 1890 units 5519 people	No. of pre-school population: 392 No. of childcare places required: 131	No. of primary school population: 662 No. of classrooms: 26 New primary schools: 4	No of post primary age population: 469 No. of post primary schools required: 1 which would have additional capacity	Permission granted centrally for 1 no. neighbourhood centre. Existing strategic and regional level recreational centres within the neighbourhood.	Ballymacool town Park under construction therefore significant open space provision.	Identification of appropriate green corridors linking to permitted neighbourhood facility and new town park necessary
Scribbly/Leck:	96 ha 3360units 9811 people	No. of pre-school population: 696 No. of childcare places required: 232	No. of primary school population: 1177 No. of classrooms: 47 New primary schools: 6	No of post primary age population: 834 No. of post primary schools required: 1 which would have additional capacity	No existing neighbourhood facilities exist. Nearest neighbourhood centre facilities would be at the town centre.	1 recreational pitch in traditional Oldtown area. A number of examples of quality open space provision within existing housing developments west. Need for more strategic location of green corridors.	Need for linkages through potential new residential areas on basis of grid layouts including appropriate hierarchy in terms of function.
Oldtown:	35 ha 1225 units 3557 people	No. of pre-school population: 253 No. of childcare places required: 84	No. of primary school population: 429 No. of classrooms: 17 New primary schools: 2	No of post primary age population: 304 No. of post primary schools required: 1 which would have additional capacity	No existing neighbourhood facilities exist. Nearest neighbourhood centre facilities would be at the town centre.	1 recreational pitch in traditional Oldtown area. A number of examples of quality open space provision within existing housing developments west. Need for more strategic location of green corridors.	Need for linkages through potential new residential areas on basis of grid layouts including appropriate hierarchy in terms of function.

Vision for the new neighbourhood structure

A broad vision in relation to each key growth node neighbourhood is set out below and is also demonstrated spatially on the Map No 3 'Neighbourhood Strategy: Vision for New Neighbourhood Structure':

Key Growth Node Neighbourhood	Vision
Glencar Irish	To continue to establish a strong neighbourhood structure so as to replicate the high level of permeability that exists at present in the southern part of the neighbourhood with new opportunities that arise in the northern part of the neighbourhood. In particular, to develop green corridors and linkages outwards to the new neighbourhood area at Glencar Scotch/Windyhall.
Gortlee	To build on the provision of district level open space by providing quality linkages that encourage walking and cycling and to encourage similar linkages to the town centre and to LYIT. To extend the planned linkages within the Gortlee neighbourhood so as to provide key corridors to the developing and new neighbourhoods at Carnamuggagh/Lisnenan/Kiltoy. To make provision for 1 neighbourhood centre within the north western part of the neighbourhood.
Glencar Scotch/Windyhall	To develop a new framework to focus this neighbourhood on lands intervening the Killylastin and Mountain Top arterial roads including the provision of community lands, lands for 2 neighbourhood centres and lands for education provision, all of which are integrated into an overarching open space strategy. Education provision co-ordinated with future needs in Glencar Irish so as to make sufficient provision for 1 no. 24 classroom school and 1 no. post primary school. To ensure a viable network in respect of a bus service within the new neighbourhood.
Carnamuggagh/Lisnenan/Kiltoy	To develop a new framework to focus this neighbourhood away from the Mountain Top and Kiltoy arterial routes including the provision of community lands 2 neighbourhood centres and lands for education provision. Education provision co-ordinated with future needs in the Gortlee neighbourhood so as to make sufficient provision for 1 no. 24 classroom school and 1 no. post primary school. To ensure a viable network in respect of a bus service within the new neighbourhood.
Ballymacool	To develop a coordinated framework for the neighbourhood so as to develop linkages over the Swilly and therein provide for the integrated provision of necessary services and facilities. To continue to make provision for land for community facilities, 1 no. 24 class room primary school and 1 no. neighbourhood centre. To coordinate post primary level education provision with the likely needs arising in the Scribbly/Leck neighbourhood.
Scribbly/Leck	To develop a new framework to deliver a permeable and sustainable neighbourhood with further permeability to the town centre and to the Ballymacool/Oldtown neighbourhood. To make provision for land for community facilities, 2 no. neighbourhood centres, 1 no. post primary school and 2 no. 16 class room primary level schools. To ensure a viable network in respect of a bus service within the new neighbourhood.
Oldtown	To develop a new framework to consolidate and strengthen this neighbourhood and to improve permeability throughout the neighbourhood and in particular to neighbourhoods north of the Swilly at Ballymacool and the town centre. To coordinate this framework with the development of the Scribbly/ Leck neighbourhood in particular in relation to the sharing of primary and post primary level facilities. To make provision for 1 no. neighbourhood centre.

2.7 Policies relating to developing neighbourhoods through urban design:

The Councils policies for developing neighbourhoods through urban design are set out below:

Policy N1: Delivering the vision for neighbourhoods

The Councils will seek to work in partnership with Government Departments, other agencies and service providers, the community and voluntary sector, the business community and the construction sector to deliver the Vision for each 'key growth node neighbourhood'.

The Councils recognise that the delivery of the Vision for each 'key growth node neighbourhood' will be an incremental process that will be complex in detail and will require a flexible approach that is open to changing circumstances. The delivery of the full range of requirements for each neighbourhood will only be achieved through good communication and positive working relationships with the range of interested bodies. The Councils will examine options to coordinate such communication during the ongoing process of implementation of this plan. In addition, the Councils will directly assist this process through the roll out of Design Briefs in respect of lands zoned 'Primarily Residential' (Policy H7, Part B, Section 3.0 refers).

Policy N2: Development proposals within 'Key Growth Node Neighbourhoods.'

Proposals for new development will, in the first instance be considered at a strategic level by the developer within the context of the neighbourhood strategy set out in Part B, Section 2.0 of this plan, so as to demonstrate that the proposal:

- a) Contributes to the vision (written and mapped) for the 'key growth nodes neighbourhoods.'**
- b) Relates to the wider neighbourhood strategy and land use zonings within the neighbourhood.**
- c) Provides for opportunities for linkages, social/community infrastructure and the development of neighbourhood nodes.**

In tandem with the ongoing implementation of this plan through collaboration with stakeholders, the Councils must be ready to make determinations on planning applications. Therefore, proposals will be considered within the wider neighbourhood context and where proposals are of a design and layout so as to materially prejudice the delivery of the vision for the neighbourhood and the target to achieve integrated sustainable neighbourhoods, permission will not be forthcoming.

Policy N3: Urban Design Principles:

Development proposals shall be required to demonstrate that the 12 urban design criteria set out in the Department of the Environment, Heritage and Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, have been utilised in the design and layout of the proposal.

The quality of the urban environment is critical within the overarching concept of delivering integrated sustainable neighbourhoods. New proposals must demonstrate high quality both in terms of the layout and in relation to detail and finish. For clarity, the 12 urban design criteria (DoEHLG) are set out below and further guidance should be taken from the Department of the Environment, Heritage & Local Government publication entitled, 'Urban Design Manual, A Best Practise Guide', February 2008:

1. Context: How does the development respond to its surroundings?
2. Connections: How well connected is the new neighbourhood?
3. Inclusivity: How easily can people use and access the new development?

4. Variety: How does the development promote a good mix of activities?
5. Efficiency: How does the development make appropriate use of resources, including land?
6. Distinctiveness: How do the proposals create a sense of place?
7. Layout: How does the proposal create people friendly streets and spaces?
8. Public realm: How safe, secure and enjoyable are the public areas?
9. Adaptability: How will the buildings cope with change?
10. Privacy and amenity: How does the scheme provide a decent standard of amenity?
11. Parking: How will the parking be secure and attractive?
12. Detailed design: How well thought through is the building and landscape design?

Policy N4: Informing Design Through the Traditional Settlement Patterns in the Town

The Councils will utilise the form and layout of the traditional settlement pattern in Letterkenny so as to inform (a) good urban design (b) the development of integrated sustainable neighbourhoods and (c) proposals for development at a local level. In doing so, the Councils will implement policies N5 -N16 and the policies contained in Part B, Section 7.0.

The wealth and diversity of the urban form and streetscapes in Letterkenny is such so as to provide strong positive reinforcements of good quality urban design principles, both at a contextual level and a local building specific level. Urban form and streetscapes mark the evolution of the town and demonstrate change over time as well contributing to the unique and special character and quality of Letterkenny in relation to its history, cultural, architecture and heritage. In recognition of this, the Councils have developed a suite of policies that aim to harness the opportunities that our urban form and streetscapes provide and to use these opportunities in a positive manner so as to assist in the delivery of a quality Gateway town. The policies relate to: -

- a). Structures on the Record of Protected Structures (RPS).
- b). The Ecclesiastic Quarter Architectural Conservation Area.
- c). The work of the National Inventory of Architectural Heritage (NIAH).
- d). The 'Town Centre Streetscape' in the town centre.
- e). 'The 'Long Established Residential Areas.'



Policy N5: Record of Protected Structures.

The Councils will protect structures included on the Record of Protected Structures (hereafter referred to as the RPS) by ensuring any works including maintenance, alteration/extension and/or repair of a Protected Structure shall be carried out in a manner sensitive to the character and setting of the structure.

The Record of Protected Structures is illustrated in Volume 2, 'Development Guidelines and Technical Standards'.

A building referred to as a Protected Structure is a building/group of buildings that the Planning Authority considers to be 'of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest', as is outlined in guidelines by the Minister of Arts, Heritage, Gaeltacht and the Islands in Part IV, Chapter 1 Section 52(1)(a) of the Planning and Development Act 2000-2006. These buildings contribute significantly to the quality of the urban area as they are remarkable both in relation to their individual character and in relation to their context. These buildings inform the organic growth of the urban area and in many cases represent landmark buildings that contribute to the identification of the form.



The Councils will implement Part IV of the Planning and Development Act 2000-2006, Chapter 1, Section 51, relating to Protected Structures in accordance with Government Policy and as outlined in 'Architectural Heritage Protection Guidelines for Planning Authorities', in keeping a register of Protected Structures and will make additions/deletions to the register as appropriate and in ongoing consultation with the National Inventory of Architectural Heritage (hereafter referred to as the NIAH).

In relation to the definition of a protected structure or proposed protected structure, legislation applies to the structure, to the land/ground and associated buildings servicing the structure within the curtilage and/or attendant grounds of the structure, all fixtures and features which form part of the interior/exterior of the structure referred to and which add to the character and/or setting of the structure as referred to.

Policy N6: Works to a Protected Structure

Works to a Protected Structure that would materially affect the character of the structure will only be permitted where it is clearly demonstrated that the proposed works will not have an adverse impact on the structure or any element of the structure, which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest and such proposals will be considered on their own merits.

To facilitate informed change in relation to Protected Structures, consultation is recommended and facilitated with the Town Council Office and the Architectural Conservation Officer, in relation to any proposed alteration/extension or modification to a Protected Structure prior to the lodgement of a formal planning application.

Policy N7: Content of planning applications at a Protected Structure.

Planning applications in relation to a Protected Structure will include such information as is outlined in the 'Architectural Heritage Protection Guidelines for Planning

Authorities', Chapter 6, as prepared by the Department of the Environment, Heritage & Local Government.

Policy N8: National Inventory of Architectural Heritage.

The Councils will support the work of the NIAH in collecting data relating to the architectural heritage of the county. Structures identified worthy of note by the NIAH will be considered by the planning authority as such, before making a decision on related planning applications.

The Department of Environment, Heritage and Local Government is currently working on an inventory of architectural heritage in County Donegal. It is expected that this inventory will be complete and presented to Members during the lifetime of this plan and will provide invaluable information to the planning authority when making planning decisions.

Policy N9: Additions to the RPS

It is the policy of the Councils to identify future additions to the RPS and undertake to make such additions under the provisions of the Planning and Development Act 2000-2006, Section 55, during the lifetime of this plan.

The Councils consider the RPS as an ongoing programme of work and will make additions/deletions to the register as appropriate. Additions/deletions to the register will be made in consultation with owners/occupiers and in ongoing consultation with the National Inventory of Architectural Heritage (hereafter referred to as the NIAH).

Policy N10: Development affecting Protected Structures.

It is the policy of the Councils to:

- a) **To protect buildings on the Record of Protected Structures their setting and curtilage/attendant grounds, and to ensure development proposals do not threaten the special character of the Protected Structure and;**
- b) **To ensure any proposed development within the vicinity of the protected structure shall be sited and designed so as only to positively impact upon the setting and character of the protected structure referred to.**

Building conservation is a matter of ensuring that the qualities that define a place are maintained while change continues to happen. This concept is actively promoted by the Councils and is an integral principle in the processes of good urban design

To facilitate informed change in relation to the historic streetscape of Letterkenny, consultation is recommended and facilitated with the Town Council Office and the Architectural Conservation Officer, in relation to any proposed alteration/extension or modification to a Protected Structure prior to the lodgement of a formal planning application to clarify the extent of appropriate works.

Policy N11: The Ecclesiastical Quarter Architectural Conservation Area

It is the policy of the Councils to implement an Architectural Conservation Area, in accordance with the Planning & Development Act 2000-2006 herein described as 'The Ecclesiastical Quarter ACA.'

The Planning & Development Act 2000-2006 places a statutory obligation on planning authorities to ensure that all development plans must now include objectives to preserve the character of a place, area, group of structures or townscape that is:

- a) Of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value, or
- b) Contributes to the appreciation of protected structures.

These areas are to be designated as Architectural Conservation Areas, the designation of which is a reserved function of Councils.

The Architectural Conservation Area previously referred to as the 'Cathedral Precinct' in the Letterkenny & Environs Development Plan 2003-2009 (as varied), has been refined in terms of its boundaries and is now referred to as the 'Ecclesiastical Quarter'. In addition, the ACA previously identified in the Letterkenny & Environs Development Plan 2003-2009 (as varied) at High Road is now replaced by the identification of a 'Historic Streetscape' spine Part B, Section 7.0 refers). The 'Ecclesiastical Quarter' ACA and the 'Historic Streetscape' are outlined on map no 6 'Town Centre Strategy.'

Architectural Conservation Areas, hereafter referred to as ACA's, consist of groups of buildings, structures and other elements which when viewed together are of a high architectural quality and are deemed worthy of protection.

The ACA provision is complementary to the RPS, allowing a clear mechanism for the protection of areas, groups of structures or townscapes which are either of intrinsic special interest as defined or which contribute to the appreciation of protected structures. Works to the outside of any building located within an ACA is deemed exempted development only if those same works do not materially affect the character of the area. Consultation with the Planning Department and the Architectural Conservation Officer regarding any work within the ACA is encouraged and will be facilitated.

In accordance with Section 81 of the Planning and Development Act 2000-2006, planning authorities must include in their development plans, objectives for preserving the character of ACA's. The relevant policy is set out on the following page (N14 refers).

The 'Ecclesiastical Quarter' ACA:

Letterkenny is the seat of the Catholic Bishop of Raphoe, where St Eunan's Cathedral provides a dominant feature in the landscape on the top of the 'Hillside of the O' Cannons' and forming an important integral feature informing the character of the Architectural Conservation Area referred to as the Ecclesiastical Quarter.

The Cathedral is a large cruciform church of the French Gothic style built of Mountcharles squared coursed rubble freestone with a polygonal choir, ambulatory, lady chapel, and an offset south spire flanking the side of the spire of orthodox design, a five bay nave with aisles and two bay transepts, save the reversed orientation.

The Cathedral is serviced by the Bishops Palace to the rear right hand side, a substantial three storey stone block structure built in squared boulder faced sandstone, with segment-headed windows and gables, providing a powerful setting overlooking the Cathedral and town.

The Cathedral is neighboured by two schools, the boys primary school to the facing right and the collection of buildings forming the girls Loreto Convent to the south west. Across from the Cathedral is the Church of Ireland Conwall Parish Church dating from the eighteen century and described by Lewis as 'a small plain structure with a spire' rubble built of minimal gothic style. The forecourt of the Cathedral and Church provides for car parking servicing the churches which is accessed via Sentry Hill Road, Castle Street, Church Lane and Ard O'Donnell Road framing views to and from the Cathedral specifically along Church Lane and Ard O'Donnell Road.

The stepped and sweeping line of terrace along Church Lane in particular eclipses a view of the Cathedral spire. The line, profile, scale and proportion of the buildings along both sides of Church Lane provide for a pleasant and harmonious progression looking towards the Cathedral.

Mount Southwell Place, a brick three storey terrace of red, black and cream provides a dominant backdrop at the top of Market Square.



Policy N12: Management of the ACA

It is the policy of the Council to manage the ACA as follows: -

- a). The Councils shall ensure that any development in the ACA will be carefully controlled to protect, safeguard and enhance their special character. The special character of the area includes its traditional building stock and material finishes, spaces, streetscape, landscape and setting.
- b). Streetscape views within, into and out of the ACA shall be maintained, enhanced and protected, particularly with reference to the character of Cathedral Square, Church Lane, and Castle Street
- c). It is the policy of the Councils to ensure that any development, modification, alteration or extension affecting a protected structure, adjoining structure or structure within an Architectural Conservation Area, are sited and designed appropriately and are in no way detrimental to the character or setting of the structure or surrounding area.
- d). It is the policy of the Councils to protect structures recorded on the RPS and features that contribute to the character of the ACA.
- e). In consideration of applications for development within the ACA, the following principles will apply:-
 - Proposals will only be permitted where they positively enhance the character of the ACA.
 - The siting of new buildings will, where appropriate, retain the existing street building line.
 - The massing and scale of any new building form will respect and positively integrate with neighbouring buildings and the character of the area.
 - Architectural detailing of historic buildings will be retained and restored.
 - Where it is not desirable to comply with car parking standards, in respect of developments within an ACA, the Councils will consider a Financial Contribution in lieu of shortfall in car parking spaces.

Planning applications in ACA's will include sufficient and detailed documentation to inform the proposed development, supported by a written assessment of the proposed development on the character of the area, completed by a suitably qualified individual with experience working with historic buildings.

Policy N13: Management of 'Long Established Residential Areas.'

It is the policy of the Councils to manage areas designated as 'Long Established Residential Areas' on the land use zoning map so as to ensure the townscape character, setting and design of the 'Long Established Residential Areas' is protected, either in an individual or collective capacity, and that inappropriate intervention or redevelopment will not be permitted. In this regard, the Councils will not permit new developments that would be incongruous with the general density and spatial pattern of development of the identified areas or that would result in a significant and material divergence from the form, scale and character of the existing built form unless it can be demonstrated that the proposal can be subsumed within the existing urban form in a manner so as not to represent a new dominant form within the area.

Policy N14: 'Development proposals within 'Established Development.'

Proposals for development within areas zoned as 'Established Development' will only be permitted where it can be demonstrated that the proposal will integrate effectively with the surrounding area and that there will be no over- development of the site or inappropriate densities. In this regard, a proposal must demonstrate that the development is appropriate in its context and setting, that the scale, massing, footprint and height is appropriate and that it does not detract from the character, amenity and design of the surrounding neighbourhood including the character, amenity and design of surrounding buildings. Proposals for intensification of an existing site within 'Established Development' shall be required to submit a design concept to demonstrate the appropriateness of the proposed development in line with this policy.

The Councils will consider character, amenity and design based on the following principles:

1. The **character** of an area will be assessed by the:
 - Identification of the dominant land uses and;
 - Appropriateness of a diversity of uses in the event that a use other than the dominant existing land use is proposed; and
 - The likely affect of introducing a development that may alter the existing balance of usage in the context of the capacity of the area to accept a diversity of uses; and
 - Architectural style of the area both in the context of streetscape, townscape and building design and the ability of the area to integrate the proposed development in this regard.
2. The **amenity** of an area will be assessed in terms of both adjoining and surrounding occupiers and in terms of the people who will occupy the development site so as to ensure that new developments be "good neighbours". Development proposals will not be permitted where there is an inherent incompatibility with neighbouring developments, or where remedial action cannot be made effective. The types of consideration of amenity which will be assessed are:
 - Privacy - for both the surrounding neighbours and the occupants of the proposed development. Loss of privacy can be minimised by re-orientation, reducing the densities of development, reducing the scale and massing of a building, and attention to building levels or by design modifications, for example, window proportion and size.
 - Traffic - Increased traffic movement and volumes together with resulting noise significantly detracts from the amenities of an area.

- General Disturbance - proposals should demonstrate protection from activities, which create unreasonable levels of noise, smells and other discomforts including wheeled bin locations.
 - Sunlight/Daylight - adequate levels of sunlight and daylight, and to a lesser extent, outlook, should be safeguarded for surrounding properties and afforded to new developments.
3. The **design** will be assessed in terms of its context and setting both in relation to the immediate vicinity and the wider neighbourhood area. In this regard, design should relate to the context and setting of the site and this need not be restrictive to new or innovative architectural expression. In considering the appropriateness of a design the Councils will assess:
- The scale and mass of adjoining development.
 - The materials, finishes and colours used in nearby development.
 - Any features on or near the site worthy of protection or enhancement, e.g. trees, views and other features of public importance.
 - Principles of site sensitive design e.g. that pitched roofs are preferred to flat roofs, pitched dormers to box dormers, vertical windows to horizontal picture windows.

Policy N15: Signage Policy

The Councils are in favour of promoting the functionality, health and vibrancy of Letterkenny through effective signage. The Councils will promote the use of Irish language, colour coding and symbols to provide quick and easy recognition. All signage should respect the architectural environment of National Monuments, important structures, areas of civic amenity, and the natural environment of views and prospects of special amenity value and interest. Volume 2 - Development Guidelines & Technical Standards contains detailed definitions and permissible signage both public and privately, for the following categories: -

Directional

Welcome, Information & Interpretative

Commercial & Business

Tourism

B & Bs, Guesthouses, Hotels

Advertising

Where a proposed sign is not covered in the above categories, the Councils will apply the criteria best suited to the proposed type of signage.

The purpose of this policy is:

- To provide a clear, effective and safe directional signage system for road users and for access to public facilities and other attractions.
- To provide welcome, information and interpretative signage and associated facilities.
- To develop more distinctive signage throughout the area of the Plan and use of signage to make the Irish language and cultural heritage more visible in the landscape.
- To avoid the cluttering of signage along approach roads.

3.0 Housing

3.1 Introduction

This section relates to housing setting out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan that state:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

3.2 Background

The growth in residential development in Letterkenny, since the adoption of the previous plan in 2003, has been significant, particularly in the environs of the plan area. The Housing Strategy, contained in Volume 2 of this plan, outlines that approximately 4743 new housing units were granted permission during the period August 2003- mid July 2008. In addition, an analysis of existing land uses within the plan area as exists (June 2007) demonstrated that housing makes up some 73% of the total developed land in the town (excluding the town centre). As a result, residential uses remain the dominant land use within the plan area.

The tendency has been to develop sites in the environs of the plan area either due to the perceived lack of available sites close to the core or to the difficulties in bringing town core sites forward for development. In addition, the supply of residential land through previous plans has made land within the environs available for immediate release and as a result, these greenfield sites become more attractive to develop and have, therefore, come under the greatest pressure for new housing.

The sporadic nature of new residential development, mainly in the environs of the town, has impacted on the quality of the residential environments that are being created. The dominant existing form of residential layouts is the cul de sac form resulting in closed cell neighbourhoods and weak permeability throughout neighbourhoods. In addition, residential developments have occurred at a rate faster than the provision of the associated social and community facilities resulting in a weak neighbourhood structure and having serious negative affects on the type of places that people are living in. The lack of social and community facilities to support the growing population at locations integrated and accessible to need means that, for example, residents have to drive across town for childcare, schools, health services or for some basic facilities such as convenience groceries. By placing greater emphasis on the quality of layout and design of new residential development, the Councils will be in a position to begin to mitigate against some of the weak neighbourhood structure that exists today.

Furthermore, the quality in specification of materials and finishes to both the site and individual dwelling units will again create more attractive, innovative and interesting places to live and will contribute to a sense of character and to the building of a sense of pride and community in a place.

Government guidance wholly supports this approach in the form of a series of Guidelines prepared by the Department of the Environment, Heritage & Local Government and this plan aims to achieve consistency with these guidelines. The guidelines are:

- 'Quality Housing for Sustainable Communities, Best Practise Guidelines for Delivering Homes, Sustaining Communities', Department of Environment, Heritage & Local Government, 2007.
- 'Sustainable Urban Housing: Design Standards for New Apartments', Department of Environment, Heritage & Local Government, September 2007.
- 'Guidelines on Sustainable Residential Development in Urban Areas', Department of Environment, Heritage & Local Government, May 2009.
- 'Urban Design Manual, A Best Practise Guide, A Companion Document to the Planning Guidelines on Sustainable Residential Development in Urban Areas' Department of Environment, Heritage & Local Government, May 2009.

In terms of land supply, adequate land has been identified for immediate release for residential development in this plan in the form of 343 ha zoned as 'Primarily Residential'. The 'Growth Strategy' at Part A, Section 2.0 of this plan sets out the need for new housing units to accommodate the projected population of between 37,000 and 39,000 people by 2020. Considering housing need set against housing land supply, there is a surplus provision of 238 ha of land zoned 'Primarily Residential'. This surplus is accounted for due to the inherited land use zonings that the Councils are attempting to rationalise arising from previous plans. Further to supply for 'Primarily Residential' the Councils have identified additional housing land for long term housing need by designating lands as 'Strategic Residential Reserve.' In doing so the Councils will manage the release of this land through a clear and transparent evidenced led approach that will involve annual assessment of a range of indicators including number of units granted permission, number of units commenced, number of units completed, amount of land taken up, rate of delivery of associated physical and social infrastructure.

Importantly, the delivery of this strategy to improve quality will require ongoing implementation actions and assessment as well as the roll out of Design Briefs in respect of lands zoned 'Primarily Residential.' The implementation phase will therefore require significant resourcing and commitment from all stakeholders and will also have added benefits in relation to the monitoring aspects required by the Strategic Environmental Assessment process and contribute to the information that will inform the 2 year progress report and the next review of the plan.

3.3 Objectives in Relation to Housing

The objectives in relation to housing are as follows:

- To supply sufficient quantity and range of lands to meet future housing need including social and affordable housing need.
- To ensure future sufficient strategic landbank.
- To promote quality in new residential areas.
- To promote the delivery of sustainable integrated residential neighbourhoods through new residential development.



3.4 Policies in Relation to Housing

The Councils policies in relation to housing are as follows:

Policy H1: New Housing Development

New housing development will predominantly be accommodated on lands zoned for the purposes of 'Primarily Residential' as outlined in policy H2 below. However, the Councils will consider new housing development at other locations as follows:



- a). Within 'Established Development' subject to policy N17
- b). Within the town centre subject to the policies set out in Part B, section 7.0
- c). Within identified 'Opportunity Sites' where the planning brief for the 'Opportunity Site' is such as to include residential development.

The approach to new housing development above is to achieve the integration and consolidation of urban form so as to create sustainable neighbourhoods and quality environments. The supply of land is based on the achievement of a sequential approach that provides for new housing on an incremental growth outwards from the core. Land supply in this development plan seeks to further refine the inherited land zonings from the Letterkenny Environs Plan 1984 and the Letterkenny & Environs Development Plan 2003 - 2009 (as varied) and ensure an adequate future strategic land bank through policy H4.

Policy H2: Housing within 'Primarily Residential.'

The Councils will support proposals for housing development on lands identified as 'Primarily Residential' on the land use-zoning map.

A total of 343 hectares of 'Primarily Residential' lands have been identified on the land use-zoning map that will have sufficient capacity to serve need for new housing units to 2015 and 2020. To quantify, need for new housing units to 2015 is projected to be 3700 units requiring around 105 hectares of land, with a further additional need of 2875 new housing units to 2020 requiring approximately an additional 82 hectares of land. The land supply within lands zoned 'Primarily Residential' have the potential to accommodate in the region of 12,005 new housing units resulting in a surplus of housing land in the region of 238 hectares to 2015.

Therefore, the Councils envision that there is an adequate supply of 'Primarily Residential' land within the plan area to cater for the long-term housing needs of the town. Furthermore, the identified supply of 'Primarily Residential' land relates to the locations that are to be driven as the focus for new residential development due to the significant opportunities presented to integrate and consolidate neighbourhoods.

Design concepts for new housing developments will be required to be of high quality in line with other policies in this chapter.

Policy H3: Single Houses in 'Primarily Residential'

Proposals for single dwellings will only be permitted on lands identified as 'Primarily Residential' where it can be clearly demonstrated that;

- a) The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of comprehensive integrated residential development/s utilising the entire site area; and

- b) The location and layout of the dwelling would not compromise the line of any proposed relief road; and
- c) The proposal would not be detrimental to the residential amenity of the neighbouring properties or be injurious to the general character of the surrounding area.

Policy H4: Release of 'Strategic Residential Reserve.'

The Councils will ensure the adequate supply of future strategic landbank for the purposes of housing beyond the life of the plan through the identification of lands as 'Strategic Residential Reserve.' The Councils will examine the release of 'Strategic Residential Reserve' lands on the basis of justification in the context of an annual housing monitor, the continued assessment of need and levels of supply, and availability of or requirements for physical and social infrastructure in the context of the neighbourhood strategy. Release of 'Strategic Residential Reserve' lands shall only be carried out in the context of a variation to the development plan.

Within the plan area, sites have been identified as 'Strategic Residential Reserve' and zoned for longer term strategic housing purposes that should not be considered for development prior to the take up and development of zoned 'Primarily Residential' sites. This attempts to manage and control the oversupply of long term housing zonings inherited from the Letterkenny Environs Plan 1984 and the Letterkenny & Environs Development Plan 2003 - 2009 (as varied), provides a long-term housing land bank, and attempts to achieve a more consolidated approach to housing development throughout the plan area in line with the growth strategy set out at Part A of the plan.

Policy H5: Single Houses in 'Strategic Residential Reserve.'

Proposals for single dwellings will only be permitted on lands identified as 'Strategic Residential Reserve' where it can be clearly demonstrated that;

- a). The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of long term multiple residential development/s upon release of the land in accordance with its strategic function under Policy H4; and
- b). The location and layout of the dwelling would not compromise the line of any proposed relief road or infrastructure corridor; and
- c). The scale and form of the development would respect the existing character of the area and shall not have an adverse impact to the existing character of the area or the residential amenity of adjoining properties; and
- d). The proposal can reasonably connect to the future provision of mains services to the area; and
- e). The development will not prejudice access to land within the reserve for future development and will not contribute to forms of ribbon development that cumulatively could result in the land locking of the 'Strategic Residential Reserve'.

Policy H6: Integrated Sustainable Neighbourhoods

The Councils will require that proposals for new residential development are of a design concept, form and layout that will contribute to the delivery of sustainable residential neighbourhoods in line with Part B, Section 2 of this Plan, the Department of Environment, Heritage & Local Government publications entitled, 'Sustainable Residential Development In Urban Areas, Consultation Draft Guidelines for Planning Authorities,' February 2008 and 'Urban Design Manual, A Best Practise Guide,' February 2008 and policies H7, 8 & 9 of this plan.

A 3 pronged partnership approach to the consideration of new proposals for multiple residential developments will be taken as follows:

1. Preparation of Design Briefs by the Councils.
2. Preparation of Design Statements by developers and their design teams.
3. Preparation of Concept Proposals by developers and their design teams.

The partnership approach outlined above and set out in more detail in policies H7, 8 & 9 is intended to deliver the appropriate level of consideration and analysis to new residential developments that will result in quality integrated and sustainable residential neighbourhoods. The information contained within Design Statements and Concepts Proposals are not intended to duplicate planning application documents but rather sit alongside and in support of the statutory documentation requirements in respect of a planning application. Further guidance can be found in the Department of Environment, Heritage & Local Government publication entitled, 'Sustainable Residential Development In Urban Areas, Consultation Draft Guidelines for Planning Authorities,' February 2008 and 'Urban Design Manual, A Best Practise Guide,' February 2008



The achievement of sustainable residential neighbourhoods through new housing development is a key vision of the Councils for the Gateway. The emphasis is placed on delivering quality places in which people want to live. The layout and form of new residential developments can significantly contribute to improved places to live in terms of the delivery of both hard and soft infrastructure to support the new population and in terms of improving accessibility and movement within the urban fabric. The Guidelines and Best Practise Manual published by the Department of the Environment, Heritage & Local Government set out the key planning principles in relation to residential development in urban areas and will be considered during the assessment of planning applications.

The Councils are confident that by taking a quality led approach there will be positive effects in relation to the creation of new neighbourhoods that are viable and attractive places to live.

Policy H7: Design Briefs

The Councils will undertake to prepare a series of Design Briefs in respect of lands zoned 'Primarily Residential' that will be used in the assessment of planning applications and against which a Design Statement in the context of a planning application (policy H8 refers) will be measured.

To manage and lead the delivery of sustainable residential neighbourhoods, the Councils will roll out a series of Design Briefs specifically in respect of lands zoned 'primarily residential'. The delivery of Design Briefs will be prioritised on the basis of the key growth nodes neighbourhoods identified within the town. The design briefs will be made available as information relating to lands zoned 'Primarily Residential' and will be used to measure Design Statements in the context of planning applications. The Design Briefs will provide information including:

- A description of the site in its urban context.
- A summary of the relevant development plan objectives and policies.
- Identification of any planning or development constraints e.g. flooding information, sites and monuments, utilities and services.
- An indication as to the type, design and layout of development which the Councils would wish to see on the site.

Policy H8: Design Statements

The Councils will require Design Statements to be submitted as part of any planning application process for all multiple developments. Design Statements shall address the Design Brief (where available) that has been prepared by the Councils.

A Design Statement enables the applicant to explain why a particular design solution is considered the most suitable for a particular site. It will consist of both text and graphics. The Design Statement shall carry out the following:

- Address all relevant development plan objectives and policies and relate them to the site.
- Identify opportunities and constraints on a plan of the site and the wider neighbourhood identifying potential barriers or paths to progress.
- Prepare an appraisal of the distinctive character of the area adjoining the site (A Character Appraisal). The detail to be contained in a Character Appraisal shall be guided by the detail outlined in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, page 100.
- Prepare a movement analysis in line with the level of detail set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, page 100.

Policy H9: Concept Proposals

The Councils will require that a Concept Proposal be submitted as part of any planning application for multiple developments. The Concept Proposal will describe elements of the scheme such as land uses and density range, open space hierarchy and built form, boundary conditions and connections and identify any requirement for an EIA.

The Concept Proposal will be developed on foot of and flowing from the Design Statement referred to at Policy H8 and will include:

- Consideration of a number of options through sketches and associated text. The options will provide different interpretations of the design brief and various analyses carried out through the Design Statement process.
- Testing of the options in terms of:
 - How the option will deliver the vision that has been established at the start of the process.
 - Consideration of whether the development is viable in economic terms.
 - Whether the option will allow for the creation of useable buildings and space.
 - How the proposal contributes towards sustainable development.
 - Identify a preferred option including the reasons.

Policy H10: Assessing planning applications for housing schemes

The Councils will use the 12 criteria set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, during both pre- application consultations and at planning application stage for housing schemes. In addition, new housing schemes will be required to demonstrate:

- That the design is sympathetic and responsive to the site characteristics including the landform, exposure to climate, and the built and natural heritage.

- That the design provides for a high quality residential development both in terms of the overall site and also in relation to the individual dwelling in recognition of the acceptance of higher densities.
- That the design considers all aspects of the layout in totality ensuring compatibility between structures, public amenity spaces, landscaping, and access to and within the site, and
- That the design does not interfere negatively with the residential amenity of adjoining/adjacent properties and that new homes offer a decent level of amenity, privacy, security and energy efficiency.
- That the design promotes and encourages walking and cycling in line with Policy H13.
- That the design provides for the right quantity and quality of public open space in line with Policy H18 & H19.
- That the design includes measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood.

The Department of the Environment, Heritage & Local Government publication identifies a '12 question' approach which breaks down urban design and sustainability principles into 12 questions that provide for a logical sequence in the design process that will in turn provide for greater emphasis on design and provide for more rigorous assessment of proposals. The Department of the Environment, Heritage & Local Government publication provides comprehensive detail in relation to the 12 questions and shall be used in the consideration of new housing scheme proposals.

Policy H11: Managing Quality

The Councils will not permit proposals for new housing schemes where the design is such that it does not respond to the policies to achieve quality set out at H6, 7, 8, 9 & 10 of this plan nor to the guidance set out in the Department of the Environment, Heritage & Local Government publication 'Urban Design Manual, A Best Practise Guide', February 2008.

The Councils are seeking to manage and lead the development of integrated sustainable communities using a partnership approach with developers and communities and therein every effort shall be made through the Development Management process to achieve a high standard of design. However, where design quality is distinctly substandard, permission will not be forthcoming. The Councils will, in these circumstances, provide clarity as to the difficulties in design and layout that necessitate review by an applicant.



Policy H12: Design of Residential Streets

The layout and design of streets in residential areas shall provide for clarity in the role and function of each street by identifying clearly the hierarchy of streets that will provide for: connectivity and permeability; sustainability in terms of priorities to walking, cycling and public transport together with a reduction in the need for car borne trips; safety; legibility in that streets should be easy for people to find their way around and; sense of place in that streets should contribute to the creation of attractive and lively places. A dominance of cul-de-sacs without provision for other functions of streets will not be permitted.

The Councils recognise the importance of careful consideration in the design of streets as integral in the delivery of quality neighbourhoods. In this regard, streets

have a function in providing public realm as well as catering for traffic movement. The challenge in Letterkenny is to strike the balance between these functions particularly in new residential areas so as to promote better urban design. The hierarchy of street layouts may include:

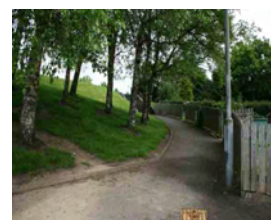
1. Links to the overall road network in the town.
2. Access to public transport.
3. Access to public facilities such as shops and schools.
4. Access for mobility impaired people.
5. Circulation routes for public services such as waste collection, bus service.
6. Residential streets with limited through traffic.
7. Residential streets with no through traffic such as cul-de-sacs and home zones.



Policy H13: Accessibility

Direct pedestrian and cycle linkages shall be provided within proposals for new housing schemes interconnecting with central amenity areas, adjoining neighbourhood developments and neighbourhood facilities and provided in addition to the primary access to the development and be designed to have maximised passive surveillance from surrounding properties be well lit and maintained and of a materials and finish that is of a high quality. Linkages that follow indirect routes and to the rear of properties will not be considered acceptable.

Road layouts shall reflect the requirements of Policy H12: 'Design of Residential Streets' and where appropriate, (i.e. adjacent to amenity areas, schools and community/neighbourhood facilities) introduce the use of raised surfaces to reduce traffic speed. Adequate provision shall be made within the development to accommodate drop-off/pick-up points and turning manoeuvres for public transport vehicles.



The Councils will seek to encourage greater pedestrian and cyclist accessibility between new developments, existing residential areas and the town centre in order to reduce the use of the car and encourage more sustainable modes of transport.



Policy H14: Layout

New residential developments shall be laid out and orientated in order to make use of the landscape characteristics including local features and vistas, and maximise from passive solar gain. Development adjacent to amenity areas shall be orientated to face onto the amenity areas to provide maximum informal surveillance. Locating amenity areas to the rear of properties will not be permitted.

Dwellings should be designed to present an attractive outlook onto adjacent roads (existing and proposed). Front elevations should not face onto the rear private spaces of other dwellings.

Low quality suburban housing developments laid out in standard suburban format with little or no interrelation, 'uniqueness' or movement patterns within and between neighbourhoods will not be permitted. In an attempt to provide distinctive and attractive residential environments, the Councils will require new residential developments to provide a Design Statement and Concept Proposal (Policy H8 & H9 refer) that considers the development in its totality in order to ensure the effective use

and compatibility of spaces within the site. This will require an appreciation of the local character, the existing urban form, building design and appreciation of movement patterns within the surrounding area while taking advantage of local vistas, landscape characteristics, informal surveillance and passive solar gain. Variety in building form, details, materials and building heights within the layout can enhance the visual character of an area and create interesting places to live.

Evaluation of the site characteristics will enable the development to be responsive to the contours and landform thus enabling visually sympathetic developments and improved energy efficiency through designs/layouts that are responsive to the local microclimate; to utilise existing vegetation and incorporate it within the new layout which will provide a degree of protection to the natural environment; and to incorporate features of archaeological and historic importance into new layouts.

Policy H15: Housing Densities

Proposals for new housing development must demonstrate that they achieve the greatest efficiency in the use of the land appropriate to its context, and encourage a sustainable pattern of development whilst ensuring the highest quality residential environment. As a guide, densities of 35-50 units per hectare will be sought. Higher densities may be more appropriate at the following locations but any such proposals must be accompanied by high qualitative standards of design and layout:

- **Town centre.**
- **Brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces) where the Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied.**
- **Public transport corridors i.e within 400- 500 metres of a bus stop (where these exist at present in respect of the town bus service or where public transport networks are planned for the future).**
- **Inner suburban/ infill where Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied.**
- **Institutional lands**

The Councils will pursue a mixed density approach to new residential development that will have regard to the location, context, and the contribution to the enhancement of the town form and to ensure the efficient use of energy, transport and natural resources within the plan area. The policy seeks to identify location where higher densities may be appropriate but in these cases there will be significant emphasis of the quality and design of layout. The approach taken seeks to strike a balance between maximising the use of land so as to achieve the consolidation strategy set against the need to protect existing residential amenities and provide for reasonable private and public space with new schemes.

Policy H16: Housing Densities within 'Low Density Residential' Lands.

Densities lower than 35-50 units per hectare will be considered on lands identified as 'Low Density Residential' on the land use zoning map.

The lands identified on the land use zoning map at Glebe are located in proximity to the River Swilly SAC and are on the Eastern fringe of the town. As a result of the environmental and biodiversity considerations and in order to develop an urban rural transition zone at this location, lower densities than the 35-50 units per hectare (policy H15 refers) will be considered. In addition, this area consists of a significant amount of single house developments and the cumulative density is therefore somewhat reduced in the area.

Policy H17: Mix and Type of Units

Proposals for residential development will be required to provide a mixture of house types and sizes in order to reasonably match the requirements of different household categories within the Plan area, including those groups with particular special needs. The Councils will seek to achieve a balance of housing stock to meet the needs and aspirations of the people residing within the Plan area.

The Housing Strategy associated with this plan includes policies to facilitate and support the provision of a standard of accommodation for the people of the Plan area that best meets their needs and aspirations. The Councils will therefore consider the appropriate mix of types and sizes of dwellings on an individual site by site basis as and when planning applications are received and will use conditions and agreements under Part V of the Planning and Development Act 2000 (as amended) as appropriate to secure the preferred mix of housing types and sizes.

Policy H18: Open Space in New Housing Schemes

Multiple residential developments in general shall include a minimum of 15% of the overall site area reserved as public amenity area in accordance with the requirements set out below and the standards set out in the 'Development Guidelines & Technical Standards', in Volume 2 of this plan.

The provision of public amenity open space within new residential developments shall:

- a) Be conveniently located within the development and designed as an integral part of the overall layout acting as a natural focal point that contributes to the visual enhancement of the development, and
- b) Be of a high quality design, providing for a multi function of uses, through the use of hard and soft landscaping techniques including equipped formal play areas, informal greens, furniture, paved and planted amenity areas, and
- c) Provide adequate lighting and signage, and highly accessible linkages with the surrounding public footpath network and other designated amenity areas, and
- d) Include a programme of maintenance.

Proposals for new housing schemes will be required to show that the open space provision meets both the quantitative and qualitative standards set out in this policy and through the 'Development Guidelines and Technical Standards.' The provision of open space within new housing schemes is a critical element of the overall open space strategy in this plan. The purpose of open space within a housing scheme is to serve the needs of the surrounding local neighbourhood. These open space areas should be interlinked with corridors that facilitate and encourage walking and cycling.



Policy H19: Open Space in High Density Areas

For multiple residential developments within the town centre and on brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces), public open space shall be required at a minimum rate of 10% of the total site area where the proposal demonstrates that the quality of the development is significant.

In recognition of the sustainability opportunities for new residential development in the town centre and on brownfield sites, a relaxation of the requirement for public open space may be exercised. However, this will require a significantly higher quality design, layout, materials and finish to offset the reduced public open space.

Policy H20: Landscaping

New residential developments shall provide landscaping to provide screening, enclosure, shelter, and acoustic barriers to enhance the overall visual/environmental impact of the development. Detailed landscaping schemes shall be required with planning applications and will include:

- a) Species, variety, number and location of trees, shrubs and other features to be provided, and**
- b) Proposals to retain and incorporate existing trees and hedgerows within the development (in accordance with Policy NE3, Part B, section 5.0 of this plan), and**
- c) Programme of implementation of the landscaping scheme.**

A well conceived landscaping scheme can contribute to the enhancement of the visual appearance of a development, enables a development to integrate more satisfactorily within a variety of locations, provides diverse natural amenity areas for residents, enables existing natural vegetation to be retained and incorporated within the layout contributing to its sense of place, increases biodiversity, and raises awareness and appreciation for the environment.

Policy H21: Car Parking

New residential developments shall provide for adequate off-road car parking to facilitate the development in accordance with the standards set out in 'Development Guidelines & Technical Standards', contained at Volume 2.

Circumstances under which the car parking and open space standards may be relaxed include proposals that contribute toward better provision of public parking and public open space. Other circumstances where standards may be relaxed include proposals for the provision of housing for the elderly, students, residential units specifically for single people, and proposals for new housing development in town centre locations.

Policy H22: Housing Schemes and the Need for Education Facilities

It is the policy of the Councils to monitor the need for education facilities within the plan area in the context of the ongoing implementation of the plan in partnership with the Department of Education and Science.

The provision of education facilities in tandem with the development of new housing schemes is critical in the establishment of sustainable integrated neighbourhoods. In Letterkenny, there are significant capacity issues in education provision to meet the existing need together with the future projected need over the period of the plan. As a critical issue, the Councils have identified a number of sites specifically reserved for the purposes of education at locations within future growth nodes however the delivery of new education infrastructure and securing of the capital investment required will necessitate a phased partnership approach between the Councils, developers, the Department of Education and Science and the Department of the Environment, Heritage and Local Government so as to be able to identify real need and therein to trigger the processes to provide for this need. The Councils are committed to engaging wholly in this partnership approach and will seek to do so both in the context of the Development Plan and Development Management processes. Further assessment has been carried out within this plan in relation to future education needs and is set out within Part B, section 2.0 entitled Developing Neighbourhoods through Urban Design.

Policy H23: Provision of social and Affordable Housing

Proposals for residential development on lands zoned 'Primarily Residential' or for mixed use purposes shall be required to comply with the policies set out in the 'Housing Strategy' at Volume 2 of this plan so as to make adequate provision for social and affordable housing under Part 5 of the Planning & Developments Act 2000-2006.

Policy H24: Provision of Childcare Facilities

Proposals for residential development shall be required to comply with the policies set out in the 'Childcare Strategy' at Volume 2 of this plan.

The provision of childcare facilities that are readily located within residential areas is part of the strategy to develop integrated sustainable residential neighbourhoods. The limited capacity of existing childcare facilities together with the projected future demand for childcare facilities to accommodate future growth is recognised in this plan. To this end the Childcare Strategy aims to facilitate the provision of childcare facilities through the Development Management process in tandem with the identification of lands at nodal points for community purposes including childcare provision.

Policy H25: Sustainable Building Practices in new Housing Schemes

In line with policy NE12, Part B, section 5.0 of this plan, the Councils will encourage and support housing scheme proposals that utilise sustainable building practices.

The Councils seek to support Ireland's obligations to reduce carbon dioxide emissions through the introduction of sustainable building practices at new housing schemes. The Councils also recognise that the integration of sustainable building practices into new housing schemes will result in an additional added benefit in terms of the quality and sustainability agenda.

Policy H26: Residential Amenity

It is the policy of the Councils both to protect the residential amenity of existing residential units and to promote design concepts for new housing that ensures the establishment of reasonable levels of residential amenity.

The protection of existing residential amenity is paramount in ensuring the proper planning of the area. New development will be required to provide appropriate mitigation measures to minimize impact on existing residential properties.

Policy H27: Sub-Division of Residential Property

The Councils will permit development that involves the sub division of residential sites only where it can be clearly demonstrated that:

- a) The existing house is not part of an overall development and the proposal would compromise the original layout of which the existing house formed part thereof, and
- b) The curtilage of original dwelling is not subdivided by more than 50% by the proposal, and
- c) The footprint of the proposed dwelling would not exceed one third of the new curtilage, and no window of the new dwelling is within 4m from any curtilage boundary, and
- d) The proposal would not appear incongruous with the density, massing, scale, proportions, materials and overall design and character of the existing property and the character of the street scene and surrounding area; and
- e) The proposal would not adversely effect the visual and residential amenity of adjoining properties and the surrounding area or give rise to adverse transport

- or road safety effects and will provide an acceptable level of parking for every separately occupied dwelling, and
- f) The proposal would not reduce the provision of adequate private amenity space for the existing dwelling and will provide sufficient private amenity space for any new separately occupied dwelling(s).

The Councils shall not normally permit development of backland sites (e.g. those in back gardens which do not have road frontage) on the grounds of character and amenity.

While the sub division of properties can lead to increased housing stock, this practise can have a significant impact on the character of certain neighbourhoods, be detrimental to the residential amenity of adjoining properties, lead to over-development in some areas and set an undesirable precedent for new development.

Policy H28: Conversion of Dwellings to Flats

Proposals for the conversion of a building into flats or the conversion of existing large flats into smaller units will normally be permitted, provided that:

- a) The building/site is capable of accommodating the additional residential amenities and avoids over-development; and
- b) The proposal would not hinder traffic movement or prejudice the safety of road users or pedestrians; and
- c) The proposal includes amenities comprising refuse disposal facilities, drying areas and access to private outdoor amenity space; and
- d) The proposal is for self-contained flats; and
- e) Where appropriate, the proposal shall include convenient and adequate off-street car parking that integrates with the neighbouring properties.

The Councils consider that the conversion of individual dwellings into self-contained flats can assist in contributing to the range and supply of housing provision throughout the Plan Area. The creation of flats from larger dwellings can help to provide greater overall housing choice and the provision of lower cost and affordable housing units in particular. This policy guides the conversion of dwellings to flats to ensure that only appropriate properties are converted and that adverse impacts are effectively resolved prior to development proceeding.

The Councils will require that extensions be in general harmony in terms of scale and design with the existing dwelling and have regard to the design of adjoining dwellings. Regard should be had to site coverage and private open space and the impact on the residential amenity of adjoining property. The Councils will not normally permit flat roof extensions to the front or side.

Where extensions are potentially capable of separate occupation but lack an acceptable level of separate parking provision or private amenity space, the Councils will impose a condition on any planning permission granting such development that the extension should only be used ancillary to the main dwelling.

All permissions for “granny flats” will normally stipulate that the premises will be returned to a single dwelling when the flat is no longer required for a family member and that it shall not be let, leased or sold other than as part of the main residence.

Policy H29: Extension to or Refurbishment of a Residential Dwelling
Proposals for extension to a dwelling will be permitted if all of the following criteria are met:

- a) The development reflects and respects the scale and character of the dwelling to be extended and its wider settlement;
- b) Provision is made for an adequate and safe vehicular access and parking; and
- c) The proposal would not adversely affect the amenity of adjoining properties.

The purpose of this policy is to make allowance for the extension of existing residential properties, although this will be subject to the need to protect the appearance, safety of access and parking and to ensure that residential amenity is protected.

Extra sensitivity will be sought in the case of extension or alteration to traditional dwellings in order to protect them for their heritage and amenity value and ensure that they remain in residential use where possible. Refurbishment and extension are subject to the need to ensure that what is proposed is in keeping with the scale and character of both the existing dwelling and its surroundings.

Policy H30: Use of Upper Floors Above Commercial Premises For Residential Accommodation.

Proposals for the re-use of upper floors above retail and commercial premises within the plan area for the purposes of residential accommodation will be permitted where it can be demonstrated that:

- a) The development does not prejudice existing commercial activity or result in the loss of residential amenity; and
- b) The development creates suitable pedestrian and vehicular access arrangements.

Vacant and under-utilised upper floors above commercial premises are a good and often overlooked resource in assisting to increase the housing stock. Re-use of upper floors is beneficial to town centre vitality and viability, improved surveillance and security and maintenance and refurbishment of existing buildings. There is also however a need to ensure that the impacts of such developments are properly controlled to ensure compatibility between potentially conflicting uses and to ensure adequate off-street car parking provision to facilitate the development.



Policy H31: Change of use of residential properties.

It is the policy of the Councils that proposals for change of use from residential to commercial, within established residential areas, will not normally be permitted. This policy does not apply to 'Home-based employment', policy E5 refers.

H32: Long Established Residential Areas.

It is the policy of the Councils to protect the residential communities within and on the edge of the town centre, as identified on the land use zoning map as 'Long Established Residential Areas' and their residents in order to provide an attractive user friendly and safe living space for the town's residents.

The identification of 'Long Established Residential Areas' refers in the main to the collective setting of our communities in areas such as Ard O'Donnell and along terraces such as those in Rosemount and Speers Lane and as outlined in the Land use Zoning Map as 'Long Established Residential Areas.'

These 'Long Established Residential Areas' provide a sense of identity and place, referencing and cultural and historic value. In Ireland, housing has always been a community concern and although housing has been influenced by the architectural styles and cultural traditions of the day, its fundamental requirements change less than those of other building types. The house, more than any other building type still remains a universal and basic unit and as such the importance of our 'Long Established Residential Areas' is to be valued and protected. These areas include Ard O'Donnell, McClures Terrace, Ballymacool Terrace, St Eunans Terrace, Iona Park, Speers Lane, Rosemount Terrace, Oldtown and are as identified in the land-use zoning map.

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4.0 Social & Community Infrastructure

4.1 Introduction

This section sets out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan which state:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

4.2 Background

The range of facilities in any community is a measure of its vitality and standing whilst the integration of these services and facilities within communities in spatial terms, is a measure of the effectiveness of the range of provision that is made. Pre- draft consultation revealed that in general terms there is a reasonable supply of social and community facilities but that the location of these facilities within new and established communities is such that there is not an equal accessibility which in turn results in social exclusion and disadvantage. The spatial integration of these facilities, targeted to locations where need is identified or a gap in provision is clear, will result in sustainable planning of social and community infrastructure. The following paragraphs set out the extent of existing social and community infrastructure.

Letterkenny is well equipped with health services, being home to the Letterkenny General Hospital (the County Hospital) and its associated outpatient services. Letterkenny General Hospital is a 302 bed acute Hospital, with an additional 23 day beds. It currently employs over 1,440 people, 564 of these are nursing staff, medical and dental staff account for 155, health and social care 136, management and administration 212, general support staff 236 and patient/client care 158. The hospital serves a population of approximately 130,000 people. In 2007 the number of daycare patients was 21,300, the number of outpatients 70,753 and emergency presentations 31,699.

The hospital consists of a single storey building that dates from the 1960s, and a multi-storey extension built above this and opened in 1981. Most of the facilities are catered for in this building but some, such as the dental and mental health facilities, are catered in nearby St. Conals Hospital.

The hospital provides a wide range of acute hospital services on an in-patient, day-case and outpatient basis. Services include Intensive Care, Coronary Care, General Medicine, Geriatric Care, Renal Dialysis, General Surgical and Urology, Obstetrics and Gynaecology, Paediatric Care (including a Neo-Natal Unit), Orthopaedics and most recently Consultant-led Oncology and Haematology Services. In addition there is a full range of clinical and non-clinical support services available on site including four main theatres, CSSD Department, Pathology/Laboratory Department and a Pharmacy Department.

The Health Service Executive is outlining their 20-year strategic plan for Letterkenny. In doing so there are significant proposals to expand on current provision in relation to both further patient care facilities and ancillary servicing properties.

Demographic and social changes throughout Ireland have placed a high level of demand on childcare services. Current government policy on land use planning aspects of childcare provision, (as set out in the Department of Environment, Heritage & Local Government published 'Childcare Facilities: Guidelines for Planning Authorities', June 2001), seeks to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. The Childcare Strategy accompanying this plan and as contained in Volume 2 sets out the demographic breakdown and future need for childcare places in the town. Again though, the provision of childcare places in a manner that is integrated into new residential areas is vital and as a result it is critical that the Councils actively pursue the establishment of a Childcare Development Fund in the next review of the Development Contribution Scheme as a manner of focusing and targeting funding within spatial priorities.

There are seven primary schools servicing the population of Letterkenny and environs, three of which lie outside the boundaries of the plan area. The issue of location of housing in relation to primary schools is one of considerable debate particularly in relation to Woodlands National School, which is currently oversubscribed, Lurgybrack National School, which is at capacity and Illistrin National School, which has limited room for expansion. Capacity as exists within the town is insufficient to meet projected population increases. As a result, the Councils are communicating with the Department of Education and Science in relation future strategic and planned provision of primary level education facilities.

There are four secondary schools, including the vocational post-primary school and the Gaelcholaiste, located in the town itself. In addition, permission has been granted near the Business Park Road for a new Gaelscoile. As in the case of primary level education, the Councils are communicating with the Department of Education and Science in relation to future need to cater for the projected population.

The integration of education facilities within the populations that they will serve is critical in terms of achieving sustainable development and in the development of integrated neighbourhoods. The implementation of the approach to sustainable provision of education facilities within residential areas and in tandem with new residential developments will be one of the greatest and most important challenges of the implementation phase of this plan.

Letterkenny Institute of Technology provides third level education in the region with approximately 2,500 students attending. Letterkenny Institute of Technology has undertaken rapid physical and academic expansion since 1995 and as a result makes a significant contribution to the town in terms of economic impacts, social impacts, development of knowledge base, retention of skill base and achievement of the linked Gateway status with Derry City. The options for the Institute, in terms of providing for the capacity to develop further, are complex and will require an approach that will maximise on the capacity of the existing campus, consider alternative locations for expansion, address transportation issues including the need to provide greater accessibility by public transport, walking and cycling and make provision for the integration of social facilities such as childcare provision, that will improve accessibility to education.

Letterkenny possesses a vibrant arts scene including An Grianán Theatre, the focus of many local, national and international events, the new Regional Cultural Centre and Travart Studios and Gallery. The area around the Theatre and Regional Cultural

Centre has become a distinct arts related area which can be described and marketed as the Cultural Quarter of the town.

An increase in the demand for indoor leisure and recreation facilities is a national trend and contributes to the quality of life agenda and the promotion of healthy lifestyles. This increased popularity requires significant investment in buildings and equipment. The Aura Letterkenny Leisure Complex at Sallaghagrane provides a 25-metre swimming pool, children's pool, multi-purpose sports hall, fitness gym, aerobics studio, health suites, all weather pitch and tartan running track. Throughout the town there are a number of other recreational pitches and open space parks including the Town Park, new town park under construction at Ballymacool, Ballyboe Park and Crievesmith Park.

The rapid growth and development of Letterkenny in recent years has placed enormous pressure on existing open space within the town centre and its outlying area. A network of parkland exists in the form of three major public parks: Town Park (Bernard McGlinchey Park), Ballyboe/Glencar District Regional Park (Meadowbank) and the Linear Park. This provision will be augmented on completion of the new town park at Ballymacool. The provision of smaller pocket parks and associated play areas is lacking and is in the main provided within new residential areas. However, all too often the open spaced areas associated with housing developments are poorly landscaped consisting mainly of open grassed areas. Areas such as Rodgers Burn and Whinney Hill, which have traditionally been used for passive recreation, need to be protected and enhanced for future generations, as do the banks of the Swilly.

A study on open space was prepared in 2000 by Ferguson McIlveen which informed the open space policies in the 2003-2009 Letterkenny and Environs Development Plan and continues to inform the Council's approach in this Development Plan. In it, the key objectives were identified for public open space. The recommendations of the study have been taken into consideration which focused on the need for additional open space, improved linkages between open spaces, mitigating harm to the natural landscape setting and preventing the loss of open space opportunities.

4.3 Social & Community Infrastructure Objectives

The objectives in relation to social and community infrastructure in Letterkenny are as follows:

- To provide for the integration of social and community facilities within new residential neighbourhoods.
- To provide for social inclusion by ensuring ready and equal access to the range of social and community facilities.
- To reserve land for community and institutional, cultural, recreational and amenity purposes.
- To reserve land for educational purposes which may include ancillary recreational and childcare facilities.
- To provide a co-ordinated and graded system of linked parks, open spaces and outdoor recreation areas which provide a range of active and passive open spaces for all sectors of the community resulting in a 'necklace' of high quality open space.'
- To protect and improve quality and amenity value of existing open spaces.
- To identify valuable natural open space resources, landscape settings and other opportunities to develop new open spaces and recreational facilities that will provide for the incremental growth of the town.

4.4 Social & Community Infrastructure Policies

The Councils social and community infrastructure policies are set out below.

Policy CF1: Provision of Health Services

It is the policy of the Councils to work in partnership with the Health Service Executive in supporting and delivering the existing and future growth and expansion of health care facilities in Letterkenny together with affordable housing.

In doing so, development proposals will be permitted for the provision of new, or extensions to existing, health facilities with a particular focus on Letterkenny General Hospital provided that the proposal:

- a) Would not have a significant detrimental impact on amenity of nearby occupiers; and
- b) Provides adequate access and parking facilities; and
- c) Supports existing or planned public transport network; and
- d) Establishes safe links for pedestrian and patient movement; and
- e) Would not have a detrimental impact on identified 'Protected Structures' or Historic Buildings/Groups of Buildings'.

The Health Service Executive is the statutory provider of health services in the Plan area organising and managing provision of both primary and secondary health care. Primary health care is generally the provision of general practitioner services, pharmacists, community nursing, health visitors, midwives, school nurses and other community based services. Secondary care is usually hospital based and reached by referral from general practitioners. It includes outpatient clinics, in-patient treatment on hospital wards and day care in hospitals. Whilst it is not the duty of the Councils to provide health care facilities, the Councils have a role in enabling the establishment of such facilities through land use zoning and development standards.

Policy CF2: Development within the 'Strategic Community Opportunity.'

On lands identified as 'Strategic Community Opportunity' on the land use zoning map, the Councils will seek to achieve a mix of health, social and community development which may include hospital expansion, community health, childcare facilities, affordable housing, community support housing. Any other use not identified herein will be considered on its own merits against the objective of establishing an area of integrated community provision that will provide benefits in terms of community development or health provision or social inclusion.

The identification of lands for future expansion on the existing level of health activity is necessary in terms of ensuring long term supply of land and clustering of services and activities. In addition, under the Affordable Housing Scheme, new affordable housing units may be provided within the area of the 'Strategic Community Opportunity', which will further provide opportunity to negate against social exclusion.

Policy CF3: Provision of Residential Care Homes

Proposals for Residential Care Homes and Nursing Homes will be permitted where it can be demonstrated that:

- (a) Adequate car-parking is provided for residents, staff and visitors; and
- (b) Sufficient private open space is provided for residents; and
- (c) They would not significantly detract from the amenity and character of the surrounding area.

The Councils aim to ensure that there is an adequate provision of residential care homes for nursing, convalescence, geriatric and hospice care. This is an important part of the overall health service appropriate to the Plan area. Residential care homes are generally suited to existing residential areas, although the Councils are keen to avoid a concentration in any one area, as this would give rise to a significant loss of local character. Properties should have adequate amenity space and room for car parking according to the parking standards set out in 'Development Guidelines & Technical Standards', at Volume 2 of this plan. Particular attention will be paid to the visual effects of fire escapes, extensions and other external alterations on the surroundings, especially if the home is located within, or adjacent to, the designated Architectural Conservation Area.

Policy CF4: Provision of Childcare Facilities

The Councils will encourage and promote the provision of high quality childcare facilities throughout identified neighbourhoods, within, adjacent to, or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes, and existing residential areas in order to facilitate localised provision of and increased accessibility to childcare facilities, and sustainable development in accordance with the Childcare Strategy contained at Volume 2 of this plan.

The Councils shall establish a system of monitoring the achievement of the provision of childcare facilities in the locations set out above.

Neighbourhood centres may be identified and used for the provision of childcare facilities where the Councils consider it more appropriate to cater for a wider area.

Proposals for new childcare facilities will comply with the standards set out in the Childcare Strategy contained at Volume 2 of this plan.

In an effort to address the existing shortfall & likely significant demand in childcare facilities as outlined within the Childcare Strategy (Volume 2 refers), the Councils will seek to encourage and promote the appropriate provision of childcare facilities throughout the plan area in a safe environment to primarily meet the needs of children, but also the social and economic requirements of the wider population to ensure the improvement of the quality of childcare services in the community.

The Councils consider that in the interests of developing sustainable communities, childcare facilities should be provided in all areas throughout the plan area within, adjacent to or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes and existing residential areas. In this regard the Councils seek to promote a more strategic and planned provision of childcare facilities so as to ensure that facilities are located where need is identified and integrated into neighbourhoods.

Policy CF5: Provision of Educational Facilities

The Councils will seek to work in partnership with the Department of Education and Science in the delivery of new primary and post primary educational facilities in line with the growing needs of the town.

The projected growth of population in Letterkenny will continue to place significant pressure on the limited capacity of existing educational facilities within the town. The implementation phase of new residential development in tandem with the necessary educational infrastructure is a significant challenge of the plan. The neighbourhood strategy (Part B, section 2.0 refers) identifies the likely anticipated need for new educational facilities to serve the towns neighbourhoods in the event that each neighbourhood develops to full capacity. The implementation of this will require

cooperation between the Councils and the Department of Education and Science so as to be in a position to respond to the identified growing need. Sites that have been identified specifically for the purposes of education are located within existing or new neighbourhoods and represent good opportunities to provide for the integration of these facilities within residential neighbourhoods that will in turn provide greater accessibility and add to the sustainability of the plan area.

Policy CF6: Overdevelopment of existing school grounds

The Councils will support the Department of Education & Science in planning ahead for the provision of new school facilities however, extensions to existing schools or the provision of increased portable accommodation within school grounds for the purpose of accommodating increased student numbers, will only be permitted where the development would not lead to the loss of play/sports or car parking areas; would not be detrimental to the amenity of adjoining properties, or would not otherwise constitute a traffic hazard (as a result of the increased number of vehicles and associated turning movements generated by the proposed development).

Extensions to existing schools in order to accommodate increased student numbers has led, in a number of cases around Letterkenny, to the over development of cramped school grounds. This has caused a reduction of amenity and play areas within school grounds, an acceptance of the long term use and occupation of temporary structures, and led to difficulties in the management of traffic movements in and around school grounds with subsequent risks to road safety generally and the safe movement of school children.

Policy CF7: Letterkenny Institute of Technology

The Councils will support the continued growth and expansion of the Letterkenny Institute of Technology including the Mission and Vision set out in the Letterkenny Institute of Technology's Strategic Plan and including business development/incubation projects that are associated with the Institute subject to the following:

- a) That any new development is of a high quality and innovative architectural design that will represent landmark buildings to identify this important site.
- b) That any new development located on the Port Road side of the campus will be of a density that both maximises the site size and that provides for a Gateway entrance to the town whilst elsewhere on the site, new development will not impact negatively on residential amenities.
- c) That any new development makes provision for permeability, ease of access and provision of appropriate infrastructure that will support walking, cycling and public transport.
- d) That any new development will not give rise to unacceptable transport or environmental effects.
- e) That proposals to integrate relevant social infrastructure, such as childcare, will be encouraged.

The Councils recognise the important role of the Letterkenny Institute of Technology in terms of making provision for third level education in the region that contributes to the success of Letterkenny as a linked Gateway with Derry. The significant associated economic, social, cultural and cross border benefits of the work of the Institute are recognised and the continued expansion of Letterkenny Institute of Technology is considered to be an important catalyst in the retention of skills base, development of knowledge based industries and employment generation. In addition, the Councils will support proposals within the campus in relation to business development/incubation projects that are associated with the Institute.

Policy CF8: New Recreation, Leisure and Community Facilities.

Proposals for recreation, leisure and community facilities and extensions, conversions and reuse of existing facilities for recreation, leisure and community activities will be permitted where it can be demonstrated that such facilities will:

- a) Be accessible to local residents, pedestrians, cyclists and those with special mobility needs; and
- b) Not significantly detract from the amenity and character of the surrounding area; and
- c) Provide adequate access and parking facilities.

The Council welcome the provision of recreation, leisure and community facilities to support local communities, particularly in the context of the recreational requirements for the neighbourhoods surrounding the town. At present many of the town's sports and leisure facilities are within private ownership, however these still provide a valuable resource to local people. Every opportunity should be taken to encourage the integration of new facilities with existing ones in order to make the most efficient use of resources.



This policy should be read in conjunction with policies CF11-CF19 addressing open space and links with woodlands around the town, and importantly the River Swilly.

Policy CF9: Retention of Recreation, Leisure and Community Facilities.

Development proposals for the change of use of a recreation, leisure or community facility will only be permitted where the applicant can demonstrate:

- a) That there is insufficient local demand for the existing facility; or
- b) That an alternative replacement facility of equal or greater community benefit is to be provided for the respective area.

The loss of a recreation (be it public or private), leisure or community facility can have a major impact on a community, especially in localities where no other such dedicated facilities exist. Community halls and playing fields as examples, are particularly important as focal points for town life since they can offer opportunities for a variety of social and recreational activities.

In order to prevent the loss of recreation, leisure or community facilities the Councils will discourage their change to non-community or non-recreational uses. Instead, an alternative community use will be sought. However, in the exceptional event that a developer can demonstrate there is insufficient local need for such facilities an alternative use may be allowed.

Transitional arrangements will require that the existing facility or a replacement is made available for local use whilst the alternative/new facility is in development.

Policy CF10: Existing open space

The Councils will seek to improve the quality and scale of the existing open space so that open spaces are well designed, attractive to use, safe, and adequately serve the needs of the demographics in the plan area.

Open spaces and recreation facilities enrich our lives and our environments. Good access to these facilities can improve personal health and well-being. Providing play spaces and other opportunities for children and young people to play and explore can support their wellbeing and development. Open spaces which are well designed can add to the sense of identity of a neighbourhood, improve the image of an area and create a community spirit. Open spaces can also provide habitats for wildlife and creating a network of open spaces is particularly important to achieve the Council's biodiversity objectives.

The Councils will continue the ongoing management of existing public open space areas as follows:

- Within the lifetime of the plan the Councils will seek to extend the Town Park to incorporate a proportion of land around Gortlee House and a pedestrian access through Gortlee and lands north beyond St Cona's Hospital towards the Upper Kilmacrennan Road, which would open up further pedestrian linkages to residential areas and the town centre, making the park more accessible.
- Continued management and maintenance of Ballyboe Park and the Linear Park.
- Lands at Ballymacool are identified as an open space area and, using a partnership approach is being developed as a new public park for the town. Having regard to the proximity of these lands to the new leisure centre, the GAA grounds and the potential of the riverside as a linear park, the Councils seek to promote this area as a key part of the necklace of open space and in particular serving the west side of town.



Policy CF11: Protection of existing open space

It is the policy of the Councils to protect land of recreation and open space value in order to ensure the provision of sufficient lands and amenities for the use and enjoyment of the public. There will be a presumption against development on open space.

There is a high demand for high quality recreational open space arising in part from increased recognition of the importance of personal health and increased opportunities from additional leisure time. As a result, existing open spaces are considered to be valuable. The clustering of community and social activities around and adjoining open spaces will result in the integration of the types of facilities and amenities required to serve a neighbourhood and the open space component can provide for appropriate pedestrian and cycle routes and a quality environment. Therefore, there may be cases where the loss of existing open space for purposes other than recreational or community uses may be acceptable subject to the adequate integration of the new uses with the surrounding open space and subject to the assessment outlined in policy CF12.

Policy CF12: The Provision of a Graded and Coordinated System of Parks

The Councils will aim to deliver a hierarchy approach through the grading and co-ordination of a system of parks so as to provide a balance in the variety and choice of



active and passive open spaces within the plan area which can be enjoyed by all sectors of the community.

Letterkenny requires a variety of high quality parks that will offer a choice of open space opportunities with high levels of access for residents in a manner that promotes social inclusion. The hierarchy of parks will range from large district parks serving the wider area of Letterkenny down to small children's play areas and passive recreation close to peoples homes within their neighbourhoods.

It is recognised that although the existing Bernard McGlinchey Town Park and the town park at Ballymacool [under construction] serve as town parks at present, in relation to their location, size and accessibility by foot, cycle and transport they are referred to as district parks in the Council's hierarchy of open space.



The hierarchy of parks that the Councils will aim to achieve is represented below:

The Hierarchy of Parks

District Park

Serves: 2/3 adjacent neighbourhoods & services wider plan area.
Size: Between 10-20 ha depending on the intensification of use.
Accessibility: Foot, cycle, car and public transport.
Active and passive uses: Should be high quality open space. Landscape setting with variety of natural features. Provide wide range of activities including outdoor sports facilities & playing fields, children's play areas for a range of age groups, & informal recreational pursuits. Should provide some car parking.

Neighbourhood Park

Serves: Each neighbourhood.
Size: Between 1-5ha dependant on intensification of use.
Accessibility: Designed for pedestrians within 10mins walking distance.
Active and Passive uses: Provide high quality active and passive open space including for example court games children's play for younger children, seating areas, nature conservation, landscaped environment, & playing fields if the parks are large enough.

Pocket Park

Serves: a street or number of streets
Size: 0.2-1.0 hectares.
Accessibility: Within street environment
Active and passive uses: Provide amenities for either a passive or active use to meet a range of needs. Garden's, seating areas, nature conservation areas. If an area is intended to be active children's play equipment that is fenced and located within close walking distance to nearby houses overlooked by residents

Policy CF13: New Districts Parks and Neighbourhood Parks

The Councils will aim to achieve a greater supply of district parks as indicated on map no 3, 'Neighbourhood Strategy- New Neighbourhood Structure' by working in partnership with other agencies, voluntary groups and individuals so as to bring forward opportunities to improve access to District Parks throughout the plan area.

Having regard to the shortfall of open space within the plan area at District Park level, the Councils have identified areas that are spatially located at opportune locations to serve a number of neighbourhoods and therein to provide for key linkages and integration of neighbourhoods. The Councils will promote these lands for open space and recreation in accordance with the hierarchy of open spaces. The identified gaps are prevalent in the areas south of the Swilly, Lisnenan/Kiltooy and Windyhall.

Policy CF14: Pocket Parks

New applications for residential development will be required to make provision for 'pocket parks' as part of the overall design statement and concept proposal that are integrated within the overall layout and accessible by means of identified walkways/ linkages from residential properties and in line with policies H8, H9 and H10, H18 & H19.

Additional dwellings add to the local population and therefore add to the demand for open space. New residential developments are therefore expected to provide open space of a suitable size, nature and specification in accordance with the hierarchy of

open space requirements. Unless this approach is adopted it is unlikely that future demand will ever be capable of being met locally.

The Councils recognise that a quantitative approach where developers provide a certain percentage of open space will not in its self create successful open spaces. A qualitative approach towards open space provision will therefore be advocated at the forefront of all development proposals.

Concept Proposals and Design Statements are required to be submitted as part of proposals for multiple residential developments (Policies H8, 9, 10 refer). These design processes will involve the setting out of a strategy in relation to open space to demonstrate that the proposal will meet the needs of future populations and should be in accordance with the open space hierarchy. The types of considerations that should be made in the design process of open space include:

- To provide high quality new open spaces that are well designed from a visual perspective and that have soft and hard landscaping. The design of the open space shall be such to enhance the character of residential areas.
- Provision should be made for suitably located recreational infrastructure as an integral part of a residential development and neighbourhood and that the recreational infrastructure should serve the needs and profile of the future residents and the scale and type of the development.
- The open space should be suitably proportioned to achieve high functional open spaces that are permeable and accessible to a maximum amount of residents in the surrounding area. Unusable narrow or steep tracts of land will not be acceptable.
- The development of open spaces should aim to enhance and protect natural features and views i.e. all mature trees and other amenity features are to be retained and integrated into the development.
- To retain where appropriate, parts of the built environment and existing heritage features that would enhance the development.
- A well-designed open space will be based on the principles of a safe and secure environment ensuring adequate overlooking supervision, surveillance, public lighting, accessibility and boundary treatment.
- The open space must be designed so that it is highly accessible and permeable to local residents.
- The location of open space provision such as sports pitches must be such that it does not disturb the amenities of residents but must be easily accessible to them. The location of children's play facilities must be given a high degree of consideration so that that they are both overlooked and easily accessible while not causing disturbance to neighbouring properties.
- The areas of amenity open space will be required to be conveniently located within the development to provide a safe play area for children and should be overlooked by as many houses as possible. Open space areas located to the rear of dwellings and with a narrow access from the public road will not normally be considered suitable. Houses will not be permitted to back onto open space.
- All open spaces should demonstrate how they have considered biodiversity. District and Neighbourhood Parks will have more scope to consider natural habitats and flora and fauna or natural areas.



- The potential for maximising the use of open space facilities (such as all weather pitches) should be explored, for example, by sharing them with nearby schools.

Policy CF15: A 'Necklace' of Open Spaces.

The Councils will identify and encourage links between open spaces (a 'necklace' of open spaces) that particularly benefit wildlife and biodiversity and that facilitate access to open space. In identifying a network of open space the Councils will identify some spaces within the network with limited access to provide a haven for wildlife habitats and to achieve a balance between people and animals.

Developing opportunities to link open spaces creating green corridors around Letterkenny for visual amenity, recreational use and wildlife corridors has a number of benefits. In the first instance, this approach will add to the permeability of the town plan area and therein improve integration of land use activities with knock on effects in terms of improvement of quality of life. In addition, this approach will encourage walking and cycling and therein assist in creating a more sustainable town and provide for healthy options for the people that live in Letterkenny. Finally and significantly, this approach will help to sustain important environments within the plan area in relation to their contribution to the biodiversity and visual contexts of the town. This development of a 'necklace' of open space will contribute to the position of Letterkenny as a quality Gateway town.

The aim of the 'necklace' of open space is that networks would join up open areas such as the District Parks, the River Swilly and other natural amenity areas such as streams and wooded areas. These areas can then link into neighbourhoods to enhance biodiversity and amenity of residents. Areas of limited access of passive nature may include Rodgers Burn, Kiltroy Woods, parts of the River Swilly, EU designated Conservation sites (SAC, SPA, NHA).

Policy CF16: Walkways/Cycleways

The Council will encourage the provision of new high quality walkways and cycleways and the upgrading of existing networks to and within open spaces to ensure that they are safe accessible and attractive to use.

The standard of networks in relation to walkways and cycleways is critical so as to encourage a change of focus from the car to these more sustainable and healthy forms of movement. In this regard, networks should be attractive, interesting and safe with access to all sectors of the community. Networks should be prioritised so as to link key destinations and public realm and so as to ensure maximum value from the investment made. In particular, neighbourhood parks should be planned within walking distance preferably within 3-5 minutes from the home and pocket parks should be incorporated into street layout. Entrance to parks should be designed so as to ensure that the space is permeable.



Policy CF17: Management and Maintenance of Open Space

Developers will be required to make suitable provision for the adequate completion of open space areas and for the future management and maintenance of open space. Management regimes shall be set up to take on future maintenance responsibilities, which can take the form of Development Trust or a Management Company.

The identification and development of open space areas will only contribute to the quality of the urban environment if processes are established for ongoing management and maintenance. Design techniques can also be utilised in order to reduce maintenance burden for example using appropriate shrubs and using quality lasting materials.

Policy CF18: Financial Contributions in lieu of open space

The Councils will consider a Special Development Contribution to provide for a financial contribution in lieu of open space provision where considered expedient by and at the absolute discretion of the Council such contribution being held solely for the purpose of the acquisition/provision of open space and/or recreational, amenity or community facilities located in the neighbourhood in which the proposed development is to be located.

The Councils priority is to provide open space for all residential developments in line with the hierarchy of open space and the requirements of policies relating to design and layout of new residential areas set out in Part B, section 3.0. Exceptional circumstances may include small developments, developments in or near town centre where the open space provision cannot be met or developments that are adjacent to a town park where in the context of the wider area there is sufficient open space.

Policy CF19: Cemeteries & Burial Grounds

The Councils will facilitate identification of, and support in principle, provision of cemeteries within the Plan Area.

The Councils recognise that Letterkenny is not a homogenous community with respect to faith. Just as different religious communities require Places of Worship so they also require burial grounds. The Council will consider applications on a case-by-case basis, enabling the faith group to identify land that would be most appropriate for them. In addition, the 'community' zoning (land use zoning map refers) would support new cemeteries.

Factors that the Councils will consider will be that the location of the cemetery or burial ground will not give rise to unacceptable traffic or environmental effects nor be prejudicial to residential amenity and that adequate parking is available.

5.0 Natural Environment

5.1 Introduction

This chapter relates to the Natural Environment, setting out to provide a policy framework to support the implementation of strategic objective 5 of the plan, which states:

Strategic objective 5:

To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.

5.2 Background

Letterkenny is set within a wider area of outstanding landscape quality while the urban centre of the town is set within the River Swilly Valley at the rivers lowest crossing points. The surrounding valley hillsides with elevated slopes and ridges provide a strong enclosed setting for the town. This landscape setting is one of Letterkenny's greatest assets, which, in addition to the river, lough and valley comprises streams, woods, historic monuments, trees, wetland, archaeological sites as well as undulating landscape giving scenic views of Lough Swilly, the town itself and long ranging panoramic vistas of the upland terrain of the Knockbrin and Garvoge Ranges.

This unique natural environment, as well as supporting rich biodiversity and offering a great amenity value is one of the foundation stones of local identity and sense of place in Letterkenny. It contributes to the quality of life of local people and provides a unique attraction for visitors in the region.

The landscape and natural environment is a finite resource and requires protection, management and enhancement to ensure we can make best use of its features whilst ensuring its qualities are sustained for the enjoyment of future generations. Careful consideration is required in providing a framework that can allow a Gateway town like Letterkenny to prosper and grow economically whilst maintaining its highly valuable natural environment. In doing so, the objectives and policies in this section aim to establish a balanced and measured approach of integrating the urban demands of a Gateway town with the positive environmental qualities that exists in Letterkenny today.

Not only must the plan achieve a balanced and measured approach in relation to landscape and environmental quality, but also the plan policies need to respond to the flooding effects arising from new development. In doing so this plan largely continues the framework of the 2003 development plan in relation to flooding policies developed on foot of a Flood Study prepared in 2002/2003. The Councils are working in partnership with the Office of Public Works in order to commission an additional flood study that will consider the wider complexities of the flooding issues in the town and the mechanisms that would be required at a practical level to accommodate new development and to actively bring the River into the urban life of the town centre. . It is also anticipated that Draft Guidelines to Planning Authorities in



relation to Development and Flooding are likely to be published by the Department of the Environment, Heritage and Local Government imminently. As a result of both the outputs of the Flooding Study and the publication of Draft Guidelines by Department of the Environment, Heritage & Local Government the Councils will re-examine flooding policies in relation to the need for revisions.

5.3 Natural Environment Objectives

The objectives in relation to the natural environment in Letterkenny are as follows:

- To protect, manage and enhance the natural environment and ensure that environmental and ecological issues are considered in all areas of development.
- To integrate natural environment and recreation facilities to form a combined resource.
- To protect areas within Environmental Designations, such as NHA's, SAC's, SPA's.
- To encourage the use of and access to the Natural Environment where appropriate.
- To raise awareness and improve practices in relation to nature conservation by promoting the development and implementation of codes of best practice in partnership with other relevant agencies in line with the County Heritage Plan and Biodiversity Plan for Donegal.
- To provide appropriate policy framework in relation to archaeology.
- To provide a framework to protect against flooding.

5.4 Natural Environment Policies

The Councils natural environment policies are set out below:

Policy NE1: SAC, SPA, NHA and associated adjoining lands.

Lands identified as 'SAC, SPA, NHA & associated adjoining lands' on the landuse zoning map have been designated as such under European and National legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all of the following criteria can be met:

- a) There is significant and identifiable public interest in doing so; and
- b) There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation (Volume 3, Environmental Report refers); and
- c) The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and
- d) Adequate mitigation measures are put in place.

European and National legislation now protect the most valuable areas of our natural heritage, through designation of sites as Natural Heritage Areas, Special Areas of Conservation and Special Protection Areas.

NHAs comprise an important network of designations aimed at identifying and protecting areas of outstanding conservation value, noted for flora, fauna, geology and/or topography. SPAs are specifically designated for the protection and conservation of birds, in particular those species listed as rare, vulnerable or

migratory. SACs are areas of interest containing habitats or species of European significance.

The designation of these sites at a national level is the responsibility of the Department of the Environment, Heritage & Local Government, but there is a wider public responsibility to protect these sites. The process of designation of such sites is ongoing, with new sites being added and boundaries of existing sites being adjusted. The following designations are located within the Letterkenny & Environs Development Plan boundary:

- Lough Swilly - Special Protection Area: Site Code: 004075
- Lough Swilly - Special Area Conservation: Site Code: 00166
- Lough Swilly, Big Isle, Blanket Nook, Inch Lake - Natural Heritage Area: Site code: 00166
- River Swilly Valley Woods - Natural Heritage Area: Site code: 002011

Policy NE2: Local Environment

It is the policy of the Councils to limit new development within areas identified as 'Local Environment' to limited residential development of single housing only so as to ensure minimum negative impact on:

- a) The landscape setting i.e. the proposal must demonstrate that the development will not be an obtrusive and dominant feature within the landscape but rather that the development must be of a design form and scale that can be integrated comfortably into the landscape utilising and retaining key landscape features such as trees, hedgerows.
- b) The biodiversity quality of the area where existing habitats are of a significant level of biodiversity (Map No 1 contained in Volume 3, Environment Report, 'Biodiversity'.

The Councils will not permit multiple residential developments within 'Local Environment' (i.e. 2 or more units). In addition, where the cumulative impact of single houses is such to be resulting in a piecemeal and haphazard proliferation of single housing, permission will not be forthcoming.

A number of areas within the plan have been identified as 'Local Environment' on grounds of either one or a combination of the following criteria:

- a) Lands that are not required in order to supply urban land uses such as residential or general employment.
- b) Lands that are substantially undeveloped as exist.
- c) Lands that would not contribute to the consolidation or integration of neighbourhoods.
- d) Lands that have substantial visual amenity in terms of the landscape setting.
- e) Lands that have a high biodiversity value.
- f) Lands located on the outskirts of the plan area.

As a result of demonstrating one or a combination of the criteria above, lands identified as 'Local Environment' do not have the potential for significant development within the lifetime of this plan. This approach will also support the growth strategy of consolidation, integration, vitality and quality.

Policy NE3: Protection of Trees

The Council will encourage development proposals that enhance the landscape through positive management and additional planting of native trees.

Proposals for development will not be permitted where it is considered that it will result in the destruction or significant damage to any tree, or stand of trees, which makes a significant contribution to the ecology, character or appearance of the area.

Townscapes generally benefit from the presence of trees, not least because they soften the line of buildings, act as wildlife habitats and provide scale to buildings and streets. Letterkenny has the benefit of some significant stands of urban woodland such as Robinson's at Gortlee, the woodland at Kilty (a designated NHA), and some scattered woodlands along both sides of the River.

Trees also filter out dust and pollutants. Plant and soil cover act as a significant carbon sink and retain moisture in a way that concrete and tarmac cannot. Planting of new or replacement trees may be required as a condition of planning permission. Generally, voluntary planting of native trees will be encouraged. However, inappropriate planting can cause harm to buildings, walls and sewers. Care needs to be taken to select plant species and location carefully to prevent this damage from occurring, therefore the Council will require developers to submit a vegetation survey including species, size and condition of trees to be retained and planting plan detailing species and location of trees to be planted.

Policy NE4: River Swilly and Environs

The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/cycle access to the river.

The River Swilly starts adjacent to the Glendowan Mountains and flows in an easterly direction along through Letterkenny, along the southern edge of the town centre and into Lough Swilly. From the Port Road through to Lough Swilly the river is designated a candidate SAC and contains several SPAs and NHAs. The site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive and supports a population of Otter, a species listed on Annex II of the EU Habitats Directive. It is also of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance, plus 3 species occurring within the site in numbers of international importance.



Although being internationally significant for its habitat, the river has been greatly under-utilised. At present tidal fluctuations result in exposed mudflats at low tide.

Policy NE5: Biodiversity

The Planning Authority shall have regard to the established level of biodiversity identified in Map No. 1 contained in Volume 3, Environmental Report, 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.



A Biodiversity Study was commissioned by the Councils to inform the process of the preparation of the development plan. The map associated with the analysis of existing biodiversity identifies areas such as important stands of trees/woodlands, important habitats, watercourses and hedgerows that cumulatively contribute to the overall biodiversity of the plan area.

Policy NE6: Water Quality Management

Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.

It is necessary to protect the River Swilly and its tributaries, waters downstream of those rivers and other waters in the Plan Area, including groundwater, for the purpose and use of drinking, fishing, nature conservation, bathing and other water-related activities. The surface run-off from activities such as industry and farming contaminates local water bodies and sources. These must be protected from further potential pollutants.

Policies for water supply and wastewater treatment are addressed within the 'Physical Infrastructure' section of this plan.

Policy NE7: Protection of Archaeological Sites and Places

Proposals for development which are likely to have an adverse impact, damage, interfere or destroy any recorded monuments and their setting and zones of archaeological potential will only be permitted where it can be clearly demonstrated that:

- a) An archaeological assessment has been conducted; and**
- b) The scale and the quality of any proposed development or other material considerations outweigh the value of the remains in question; and**
- c) Proposals for the conservation and management of archaeological resources have been included; and**
- d) There will be no destruction of recorded monuments**

Archaeological remains are a finite, non-renewable resource particularly vulnerable to partial or total destruction, containing irreplaceable information about the past. The Councils recognise the value and significance of its archaeological heritage and therefore seeks to ensure the effective protection, conservation and enhancement of archaeological sites, monuments and their settings.

The Councils have set out the following criteria for assessing the local significance of archaeological sites and monuments. These factors should be viewed as indicators, which contribute to a wider judgment, based on the individual circumstances of a case and may include one or more of the following:

- a) Period - all types of monuments that characterise a category or period should be considered for preservation.
- b) Rarity - there are some monument categories, which in certain periods are so scarce that all surviving examples, which still retain some archaeological potential, should be preserved. In general, however, a selection must be made which portrays the typical and commonplace as well as the rare.
- c) Documentation - the significance of a monument may be enhanced by the supporting evidence of historical records, or contemporary written accounts, or reports of previous investigations.
- d) Group value - the value of a single monument may be greatly enhanced by its association with related contemporary monuments or monuments of different periods. In some cases it is preferable to protect the complete group of monuments, including associated and adjacent land, rather than to protect isolated monuments within the group.

- e) Survival/Condition - the survival of a monument's archaeological potential, both above and below ground, is a particularly important consideration and should be assessed in relation to its present condition and surviving features.
- f) Diversity - some monuments may be selected for scheduling because they possess a combination of high quality features, others because of a single important attribute.
- g) Potential - in some cases, it may not be possible to specify the precise nature of the archaeological evidence, but it may still be possible to document reasons anticipating its existence and importance and so to demonstrate the justification for its scheduling. This is usually confined to sites where there are no distinctive aboveground remains.
- h) Fragility/Vulnerability - certain important archaeological remains may be particularly vulnerable to damage or careless treatment and therefore benefit from the statutory protection scheduling confers.



Where significant archaeological remains are found through excavation, the Council will require a plan for their recording and conservation (either in-situ or ex-situ) as a component of an application for planning permission. The Councils will operate in favour of preserving archaeological sites intact. Developers should take account of this in the design phase of any proposed development.

The Councils will seek archaeological assessments as part of a planning submission when a proposed development could affect a Recorded Monument, a Zone of Archaeological Potential or their settings, also to require an archaeological assessment (including visual impact assessment) to be submitted detailing the potential impact of any development on both upstanding and buried structures/deposits when considering development in the vicinity of all upstanding remains.

All known archaeological sites shall be identified within the development plan, however, the Councils recognise that it is impossible to identify all archaeological and monument sites within the plan boundary, as some may only become visible through development processes. As such any archaeological sites/monuments, which are discovered before or during the process of development, shall be reported to the Department of Environment, Heritage & Local Government.

Policy NE8: Flood Risk Management

The Council will pursue a managed risk approach to flooding in the Letterkenny area and will be guided by the precautionary principle. The development plan will:

- a) Direct development considered of 'high risk' to public safety, away from vulnerable locations;
- b) Specify the criteria against which new development will be managed within areas within the settlement boundary below the 6m contour line;
- c) Safeguard floodplain areas and low lying land within the town from inappropriate development and ensure, where possible, that they can flood naturally;
- d) Identify proposals for new flood protection measures where development occurs;

e) Encourage the use of sustainable urban drainage systems (SUDS) in the management of surface water runoff in all new development.

A flood study was commissioned by the Councils and reported in 2002, the recommendations of which informed the preparation of the Letterkenny & Environs Development Plan 2003 - 2009 (as varied). This flooding study included the modelling of the entire extremity of the River Swilly from beyond both the east and west plan boundaries and had cognisance to a combination of the highest recorded flooding levels, tidal surges, and the estimated 50 and 100 year return floods. From this evaluation, the model indicated that land situated below the 6m contour line should be considered to be at risk from flooding (Ordnance Datum at Malin). The land use zoning map identifies the 6 metre contour line. In order to update the 2002 Flood Study, the Councils are working in partnership with the Office of Public Works to prepare a new flood study of the plan area. The purpose of this study is to provide updated data over the 6-year period, identify catchments, provide practical mitigation proposals and identify lands that may not be suitable for development and to provide options for the integration of the river into the urban form within the town centre in particular. This study is being commissioned currently and will be likely to have an 18 month study period. In addition, the Department of the Environment, Heritage & Local Government in conjunction with the Office of Public Works, are preparing draft Guidelines to Planning Authorities in relation to development and flooding. The Councils will reconsider the current position in relation to flooding related policies once the draft Guidelines have been issued and once the new flood study is complete.

Low-lying parts of Letterkenny are at risk from flooding from the River Swilly, its tributaries and the Swilly Estuary. Flooding is a natural event that can be aggravated by natural and man-made factors. These include climate change, high winds, tidal surges, spring tides, lack of maintenance of drains and watercourses, and inappropriate developments within the floodplain which increase the rate of surface water runoff. Recent rainfall patterns in the west of Ireland are increasing and coupled with the apparent instability of climatic patterns, this makes flooding events increasingly difficult to predict and reinforces the need for a precautionary approach.

While the catchment of the Swilly is predominantly rural, increasing urbanisation of the catchment will result in greater surface water run-off into the Swilly tributaries. During periods of high water levels in the Swilly, this increased volume of water in the tributaries must be adequately stored in suitable locations behind the river embankments. Failure to effectively address this issue may result in the increased risk to localised flooding.

In Letterkenny, the areas considered to be at risk are those lying below the 6-metre contour line. This includes areas such as the Port Road, Pearse Road, the Neil T Blaney Road. As these areas have been so extensively developed to date, the Councils accept that there must be an element of risk tolerance in its management of flooding. Such is the nature and the extent of the flood threat (stemming from natural climatic conditions, more so than man-made factors), that the complete elimination of flood risk is considered technically and economically unachievable. Under these circumstances, the Councils accept the nature of the risk in any given circumstance must be weighted against competing economic, employment, social, environmental or recreational benefits that might accrue. However, in doing so, they



require measures to be taken to ensure that those developments that pose a risk to public safety are excluded from locating within areas at risk.

The approach is therefore to manage the risk through the exclusion of those uses most vulnerable to flooding, and the inclusion of those uses that can take appropriate measures to protect themselves and others from damage and be capable of recovery in the event of inundation.

Policy NE9: Flood Risk Assessment

The Councils will manage flooding through the assessment of flood risk as follows:

i) High Risk Exclusions:

The Councils will direct developments considered of 'high risk' away from sites that fall below the 6m contour line (Malin OD) and will refuse applications for such proposals that fall within such areas. Proposals will be considered of high risk if they:

- a) Represent an unacceptable threat to public safety or public health, (for example, cannot be evacuated in an emergency, and constitute a risk to human life); or
- b) Are likely to cause unacceptable levels of pollution or contamination of flood waters if inundated.

Examples of developments considered as 'high risk' would include, hospital, medical and emergency services; special care residential developments for the physically impaired or elderly; commercial developments that involve polluting or contaminating processes or materials e.g. sawmills, chemicals, acids, or fuel storage. Developments that if flooded would cause risk to others: for example electricity sub stations.

ii) Managed Risk Proposals

The Councils will seek to manage the threat from flooding for developments not considered as 'high risk'. Within this approach there is an acceptance of risk on the basis that developments must adopt appropriate protection and mitigation measures and have the potential to make a contribution to the improvement of flood water management within the area at risk. Proposals will only be considered where it can be demonstrated that the development:

- a) Has been designed to minimise the risk of surface water inundation and will not contribute to or increase the risk of surface water flooding elsewhere; and
- b) Has adopted all reasonable measures to improve the management of flood waters on and adjacent to the site and to assist the protection of properties within the vicinity of the site; and
- c) Incorporates building design measures and materials to assist evacuation and minimise damage from inundation.

iii) Supporting Information

The Councils may request supporting information to substantiate the adequacy of design/mitigation proposals for development at risk, or likely to cause risk elsewhere. This information will normally be required in the form of a hydrological report which in addition to addressing the issues raised in paragraph (ii) above, may be required to include the following information:

- a) Indicate the location, route and destination of culverts, channels and storage areas to accommodate surface water discharge from the proposed site to a suitable outfall.
- b) Include surface water design calculations establishing the adequacy of the proposed surface water drainage between the site and the proposed outfall to

facilitate the proposed development and that has cognisance to the 50 year storm. These details shall be accompanied by the results from a hydrological survey indicating the effect of the proposed development on the existing surface water network and proposed outfall;

- c) Include a programme of maintenance for the upkeep of storm water drainage and flood storage areas from the proposed site to the proposed outfall;
- d) Provide details of proposed uses of the development/structure below the 6m contour line.

Only appropriate uses that would not adversely be affected by temporary inundation will be considered acceptable within areas considered to be at risk to flooding.

The town centre is in part located within the 6-metre contour line and therein within the flood risk area. In recognition, the Councils will seek to consolidate the town centre area so as to make best use of the existing land resources but to ensure that adequate mitigation measures have been provided for any new development.

Regardless of how well we can design, some uses should not be tolerated in flood risk areas and these are outlined in the policy. These uses will put people at risk, endanger life or contaminate flood waters causing damage to aquatic life and potentially poisoning ground water systems. The policy will direct these uses onto higher ground.

The onus will lie with the development to demonstrate its robustness to withstand flood, provide for storage, and minimise impacts on land elsewhere. Detailed supporting information will be necessary to enable the Council to fully assess the impacts of proposals and hydrological reports may be required to substantiate design solutions.

Policy NE10: Flood Defence Requirements

Where development is proposed in proximity to the River Swilly or its tributaries, proposals shall clearly demonstrate:

- a) The preservation of an undeveloped 20m buffer on either embankment of the river Swilly and an undeveloped 10m buffer to either side of the major tributaries to the Swilly with public access reserved for emergency and service vehicles.
- b) The provision of additional storage areas to cater for the possibility of breaching or overtopping of the Swilly or tributary embankments.

The Office of Public Works (OPW) have provided and maintained the existing flood embankments along almost the entire river and a series of sluice gates at main tributaries to the Swilly. The river has never previously been gauged and therefore the flooding behaviour of the river is based upon past flooding experiences with ordnance survey maps indicating that areas behind the embankments are subject to localised flooding. During high water levels, smaller tributaries discharge into a series of back drains that act as essential storage areas. These flood defence mechanisms (embankments and sluice gates) have been put in place to provide arterial drainage and protection to the adjoining agricultural land. The storage areas and the back drains while essential do not necessarily provide all the required storage during peak flows and accordingly it will be necessary not only to protect and enhance these existing storage areas, but to ensure the provision of either natural or manmade storage areas that have adequate storage capacity.

Emergency access is required to maintain the existing agriculture flood defences that bound the Swilly and its tributaries as it passes through Letterkenny.

Policy NE11: Surface Water Management

Where it is considered that the existing surface water drainage may be unable to accommodate an additional discharge generated by proposed development(s), the Councils will require the submission of surface water design calculations establishing the suitability of drainage between the site and a suitable outfall. The Councils will promote and may require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the Councils will require the use of Sustainable Urban Drainage Systems is in relation to lands located within the Flood Risk Area identified on the Land Use Zoning Map excluding the Town Centre.

The Council recognise that the disposal of surface water and the prevention of flooding are critical issues to the long-term development of the Plan Area. The flood study will identify the drainage capacity of existing, and future, urban lands and make recommendations as to suitable storm water management, which can then guide this policy.

Policy NE12: Sustainable Building Practices.

The Councils will encourage and support the use of renewable technologies and sustainable building practices in all residential and non-residential developments and actively facilitate the continual development of renewable technologies with regard to residential amenities and landscape sensitivities.

The Councils will support the development and utilisation of renewable technologies in Letterkenny in association with proper planning and sustainable development guidelines. Government policies and initiatives will be considered and adhered to when assessing proposals. The Councils will have regard to national policies, such as sustainable development, maximising energy consumption from renewable resources and Building Energy Rating (BER) certificates. This approach will ensure that the Councils continue to support the growth and regeneration of the plan area in a sustainable manner

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6.0 Employment, Enterprise & Economic Development

6.1 Introduction

This chapter relates to the maintenance and creation of Employment, Enterprise and Economic Development and sets out to provide a policy framework to support the implementation of Strategic Objective 3 of the plan, which states: -

Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business and environment, high level infrastructural access and attractive urban form

6.2 Background

Letterkenny is designated as a linked Gateway within the National Spatial Strategy 2002 - 2020 (NSS). This linked Gateway status identifies Letterkenny in association with the city of Derry as the primary economic and employment centre for the northwest. The key ingredients of a successful Gateway are indicated as: -

- Having a high quality and range of infrastructure,
- Innovative centres of education linked to enterprise,
- Dynamic enterprise culture in all sectors,
- Comprehensive quality of life attractions,
- Social cohesion and investment in community development and,
- A high quality physical environment.

In addition the NSS identifies future trends in enterprise as: -

- The majority of new jobs will be created in the service sector,
- The increasing importance for companies in the service sector of locations at or close to major points of consumer demands,
- Local services, health care, leisure and tourism will become even more significant as the population ages and disposable incomes rise,
- The need to allocate additional investment in research design, innovation and development to remain competitive and viable,
- Areas with a strong population base that can support high quality business infrastructure, technological development and innovation will continue to be major attractors, and
- A range of high quality residential locations will be necessary to attract skilled labour.

6.2.1 National Development Plan 2007-2013

The National Development Plan 2007-2013 aims to promote sustainable growth and employment, with a key focus on the promotion of Gateways as the economic engines in each region. Its key objectives include: -

- Ensuring that each Gateway region maximises its potential for economic and social development;
- Achieving a better balance between the regions in terms of economic and social development; and

- Fostering enhanced co-ordination in the development of the Gateways and their regions and between planning and investment at local, regional and national levels.

The National Development Plan 2007-2013 highlights the creation of strong Gateways in the region outside of Dublin, focussed on accelerating the development of strategically placed and national scale urban centres to act individually and collectively in delivering more spatially balanced patterns of economic development and population growth throughout their Regions.

As such, there are nine Gateway towns in the country, which are identified as having a strategic location relative to their surrounding territory, possess good social and economic infrastructure and can support the supply of services. These Gateway towns are key in their respective regions and usually provide higher functional facilities including general hospitals and higher education facilities. Further to this they are capable of stimulating growth in their hinterlands and catchment areas while recognising and exploiting the tiered structure between the Gateways, Hubs, county towns, other towns, villages and the rural areas.

The National Development Plan also indicates that there is a crucial need for medium-sized towns to act as hubs of economic growth supporting, in turn, the development of smaller towns, villages and rural areas. These towns would have the potential to attract smaller-scale foreign direct investment and to develop indigenous industry and services. They are serviced by strong linkages to the Gateway, which usually provide access to the greater economy through high quality transport and technology corridors. Investment in these towns is seen as a key factor in spreading the benefits of national economic development more widely across the country.

The National Development Plan outlines a strategic framework for the development of the Gateway towns and the key areas of investment required in order to achieve the targeted development and growth as set out in the NSS 2002-2020. These key areas of investment should include:

- a). Transport - Key priorities will be completion of the major interurban routes, the upgrade and enhancement of the public transport network, improved port and airport access and investment in key secondary and non-national roads between and within the Gateway regions. The government has put in place Transport 21; a strategic investment programme focused on the implementation of transport strategies set out in the National Spatial Strategy and other key transport initiatives.
- b). Other Infrastructure - The provision and facilitation of improved energy networks and telecommunications capacity and accessibility throughout the country.
- c). Enterprise Development - The key enterprise initiatives will focus on:
 - Pursuing a Gateway approach to regional economic development consistent with, and supportive of, the NSS;
 - Pursuing a strong pro-active role in using IDA property assets as key tools for shaping and promoting regional economic development; and
 - Establishing a strong regional interaction with regional educational institutions in areas of skills, specialised training, research and development and outreach centres.
- d). Regional Aid - Focusing on developing the regions through strategic investment in the Gateways in order to create sustainable regions capable of achieving a 'critical mass'.

- e). Education and Training - Education, skills and innovation investment will be critical in aiming to support high value added industries and services. The National Development Plan 2007-2013 will support the development of higher educational facilities throughout the country.
- f). Quality of Life - The government recognizes that in order to attract investment and develop regions that investment in the social infrastructure and aiming to improve the quality of life of the populations within the region will be key. The Gateway towns face challenges such as traffic congestion, lack of both pedestrianisation and highly attractive and effective public transport networks, the need for development of high quality urban realms and the provision of amenities such as parks and cultural facilities. It is the aim of the government to alleviate these issues in order to make all Gateway towns more attractive to investors and residents alike.
- g). Gateway Innovation Fund - In particular, the National Development Plan supports the development of the Gateways identified in the National Spatial Strategy by the establishment of a 'Gateway Innovation Fund' (GIF). The government has initially earmarked €300 million for investment in Gateway towns. The Department of Environment Heritage and Local Government are currently considering applications made to this fund. The GIF seeks to fund strategic projects that can trigger accelerated development within the Gateways spurring these areas towards ascertaining a critical mass.

6.2.2 National Economic Growth

Ireland's rate of economic growth over the past decade has been extremely high, especially when set against its European counterparts. During the 1990s the country's Gross National Product (GNP) grew at an annual average rate of 6.5%, this dropped to 5.3% between 2002-2006 and was 4.1% in 2007. This rate of 4.1% is in line with predictions of between 4-4.5% growth as set out in the National Development Plan 2007-2013. The key drivers of this growth have been a combination of factors including significant levels of foreign investment, growth in the number of persons in the labour force, the increased availability of well-educated and skilled workers and a favourable international environment. The recent slowdown can be attributed to the current slowdown of the major international economies, caused in part by the high oil prices, the collapse of the sub-prime mortgage market in the USA and the slow down of the Irish construction sector. As a result, it is essential to continue to work at promoting Letterkenny as a place suitable for new investment and in doing so, to emphasise the quality business environment, the skills and knowledge base, technological access, road and airport access and the quality of the surrounding natural environment.

6.2.3 Regional context

Letterkenny and the city of Derry are the key focus of economic development in the northwest region of Ireland. These towns although on separate sides of the border, can benefit from co-operation in terms of planning and development. The NSS and the RDS (Shaping Our Future) both highlight the symbiotic relationship between these two places is key in marketing the entire northwest region as an attractive area deserving of investment.

At a regional level, the Border Regional Authority is responsible for the preparation of planning guidelines for the border region (Cavan, Donegal, Leitrim, Louth, Monaghan and Sligo). In 2004, the Border Region authority published the 'Regional Planning Guidelines - Border Region', which is currently being reviewed. This document highlights the strategic and sustainable approach to development in the border region with particular emphasis on improving the infrastructure and accessibility of the

region through the development of the Gateway and Hub towns. 'North West Region Cross Border Group - A Regional Framework for the North West' published by Tym and Partners (2006) is a follow on from the Regional Planning Guidelines and highlights the key issues and objectives that will face the northwest region in its goals of achieving sustainable growth.

6.2.4 Local Context

Letterkenny is a key economic engine of the northwest region. It is an ideal location for locating a business and possesses many important strengths including its natural environment, location, entrepreneurial culture, a well-educated and adaptable workforce.

Letterkenny has a strong and varied existing industrial base supported by traditional industries such as Donegal Co-op Creameries (dairy), Donegal Healthcare Ltd (medical devices), Donaghey Engineering Ltd (light engineering) and McKinney and Sons (Oatfield) (confectionery). In recent years the town has witnessed a significant volume of inward investment. Pramerica Systems of Ireland Limited - a software development company, has firmly established itself. Similarly Kirchhoff Ireland and PacifiCare International are some of the more recent substantial employers. In addition to foreign owned companies, several east coast companies have chosen to locate some of their operations into Letterkenny including Bromley Group, Eland Technologies and Network365.¹



The plan must strive to maintain and achieve the key determinants of sustained economic performance: the industrial base, strategic infrastructure requirements, telecommunications and the creation of a strong knowledge sector. The development of enterprise must embrace all elements: the place must be attractive to the knowledge and wealth creators in terms of living, learning, working and leisure. In part this will be achieved through the continued co-operation with Derry and the investment by the Department of Environment (NI) in the improvement of the transport infrastructure, in particular the A5 and A6 (NI) so as to achieve a greater accessibility to the major centres of Dublin and Belfast.

In line with national policy, the Councils are focused on the creation of high value industry throughout the county. This has meant the changing economic focus away from agriculture and low value manufacturing and into the creation of Financial, Information Technology, Research and Development and Service based industries. As such as a Gateway it is an objective to create a vibrant knowledge and high value based industry sector within the town of Letterkenny.

6.3 Employment Strategy

The Councils will seek to promote the economic development of Letterkenny through the application of policies and land use zoning in order to maximise opportunities presented by the town's status as the county town of Donegal and as a "Linked Gateway" within the NSS.

¹ Enterprise Ireland - *Letterkenny North West Region*

The Councils have inherited sufficient land zoned to accommodate the continued economic development and growth of the town for the period of the plan. In the region of 160 ha. of General Employment land supply still remains undeveloped. A range of sites are identified to meet the different practical needs of potential investors and thereby encourage a diversity of employment opportunities. It is considered that this approach will provide assistance to the diversification of the local economy and thereby ensure that it is more resistant to any potentially adverse changes in the structure of employment activity.

A key objective of the plan is the development of a strong and sustainable employment base. The creation and maintenance of a large employment base in Letterkenny will be paramount to supporting the continued growth of the town so that the increasing population is matched with job creation and availability in order to attain a 'Critical Mass' so that the Gateway becomes self sustainable. In attempting to facilitate the creation of indigenous industry and to attract investment into Letterkenny the Councils will support proposals, which will create sustained employment. The Employment strategy identifies the for sub categories of employment generating uses: -

Offices

Offices play a vital role in creating and supporting the sustained availability of employment within any region. It will be the Councils objective to promote office development. Distinctions can be made between different types of offices and the activities they facilitate.



General Offices:

These provide financial, professional or other services combining a retail office function with a back office function or administrative, financial and other services without a retail office activity and public administration offices. General office proposals will be promoted within the town centre as a preference.

Retail/Commercial Offices:

These are offices where financial, professional or other services are provided principally to members of the public. Retail offices are primarily suited to town centre development and commercial zoning, however some consideration will be given to applications for retail offices where they are ancillary to the predominant use of the site

Business and Technology Industries (Office based industry)

In line with national policy of supporting high value enterprise, there has been an increase of companies and enterprises providing services and products in an office-based environment. These enterprises are engaged in activities such as information technology, software development, telemarketing, data processing, media activities. There are other activities, such as companies providing technical services to industry e.g. servicing the manufacturing or construction industry, who require large floor areas and large quantities of operational parking. These types of enterprises are not suitable for town centre developments and would be more appropriately located on business park type developments within the general employment lands.

Light Industrial and Related Uses

Light and general industry has traditionally played a key role in the economy of the town. The Councils will promote the provision of light industrial units within lands zoned for General Employment.

In addition to light industrial uses which involve the manufacture of products, the following uses will generally be acceptable in light industrial areas; - warehousing and distribution, wholesale, wholesale warehousing and showrooms that are ancillary to manufacturing, fitting and trade.

Home Based Economic Activity

The Councils will accommodate the ability of an individual to work from home. With ever improving broadband infrastructure and the increased flexibility of some employers, working from home is now an option for many individuals.

E-commerce

Electronic Commerce may be defined as the exchange of value over the electronic medium. An electronic medium can be defined as the internet, the wireless network used by mobile phones or the digital TV Network. The uptake and impact of e-commerce has varied dramatically between industry sectors, but it is true to say that over time, almost every industry will be impacted in some form by e-Commerce.

E-Commerce can be facilitated in back offices and may require the use of warehouses and storage facilities. E-Commerce can normally operate without the use of a shop frontage as they access their customer base via electronic mediums; this means that often they will not require face-to-face interaction.

Education

The Letterkenny Institute of Technology has a strong relationship with the IDA, Enterprise Ireland and the local business community and supports local enterprise through provision of campus incubator space. The Institute also works closely with local employers to tailor their courses so as to ensure that graduates are achieving an education and acquiring knowledge, which can be applied practically within the local companies.

Whilst Letterkenny does not have a strong reputation as a tourist destination, it is a key central location within County Donegal, serving as a starting point or a base for many tourists who visit Donegal. "Destination Letterkenny" highlights the benefits of visiting and or staying in Letterkenny on a visit to the northwest of the county. Its location in relation to Glenveagh National Park, Newmills and both the Inis Eoghan and Fanad peninsulas is considered to act strongly in its favour. Tourism plays an important role in Donegal's economy with spin-offs in Letterkenny, the associated service sector accounting for approximately 10% of the local labour force². In addition, the promotion of Letterkenny as the linked Gateway with Derry City provides significant opportunities for a shared partnership approach to tourism with Northern Ireland. The emphasis on the quality of the built environment of Letterkenny together with the measures to improve permeability, particularly in the town centre will have knock on benefits for increased tourism that is specific to the town.

² Letterkenny Chamber of Commerce and Industry - *Agenda 2010 - A Strategy for the Economic Development of Letterkenny* (this includes hotels, restaurants and cafes)

6.4 Employment, Enterprise & Economic Development Objectives

The Councils Employment, Enterprise & Economic Development Objectives are: -

- To act on and promote the designation of Letterkenny as a Linked Gateway with Derry in the NSS 2002-2020 and their strategic roles of attracting inward investment, enterprise and employment creation within the Northwest of Ireland.
- To zone sufficient land to allow for the creation of employment, enterprise and the economic development of Letterkenny.
- To promote the creation of sustainable employment within Letterkenny.
- To create an efficient working environment with employees in mind, allowing for the provision of necessary day-to-day facilities and services.
- To concentrate the service industry within the town centre and to promote the development of the town centre having regard to the Retail Strategy (Volume 2) and Town Centre Policies as set out in Part B, section 7.0

6.5 Employment, Enterprise and Economic Development Policies

The Councils policies relating to Employment, Enterprise and Economic Development are set out below: -

Policy E1: Employment Location and Land Supply

It is the policy of the Councils to zone land for the purposes of employment creation, economic development and enterprise. Proposed developments that will create sustained employment and economic benefit will be appropriate in the following land use zonings: -

- a). Lands zoned for general employment; and
- b). Lands zoned for commercial uses; and
- c). Land with established employment generating uses; and
- d). The Town Centre

Consideration will also be given to proposals in areas other than those mentioned where it can be demonstrated that there are no other sites available within land zoned for employment generating development purposes that can accommodate the proposed development. Any development proposal of this nature should be in accordance with the other policies of this plan and should not affect the amenity of the area in which it is proposed.

Employment generating development proposals will normally be expected to locate within suitably zoned areas for general employment and the town centre. This is to try and encourage a more sustainable use of land and in order to try and reduce the need for the car as the only means of transport. The employment land supply seeks to consolidate existing employment development and provide the majority of land within close proximity to existing development and to major transport nodal points. The policy seeks to protect other residential amenity and the natural environment from inappropriate employment generating development proposals.

Appropriate locations for employment generating developments are identified on the land use zoning map and include existing employment areas and business parks, the Town Centre and other identified zoned areas. Each development proposal will be considered against these criteria as well as their acceptability with regard to other policies established in the Plan.

Policy E2: Developments in 'General Employment' zones.

In land zoned for General Employment or extensions to existing employment generating development, proposals will be permitted provided that: -

- a). They are appropriate to the respective area in terms of size and the type of employment generating development to be provided; and
- b). They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network;
- c). They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and
- d). Comply with the Major Accidents Directive as set in Policy PI10.

Proposals will also be considered for developments within the general employment zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to industry and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.

In accordance with the overall development strategy for the Plan Area, the Councils consider that generally the most appropriate locations for employment generating development will be within the defined General Employment Zone.

Employment development (particularly large-scale proposals) should therefore be concentrated in locations which are: easily accessible, or can be made easily accessible for employees, freight movement, and where there are a range of existing support services and facilities.

The Councils consider that locations outside those identified as the general employment zone on the map will not generally be suited to large-scale employment generating developments within the term of the plan. This is because: such development proposals will have a significant impact on the existing character and balance of these locations; that employment development proposals will be more difficult to adequately service with the necessary infrastructure; and that the levels of traffic generation will be unacceptable.

Where employment generating development proposals at locations outside these zones are acceptable in principle, this will usually be because they are of a small scale in terms of the number of likely employees and the proposed site and building size, accord with the scale and character of other development within the surrounding area, and because the developers have sufficiently demonstrated that there are no suitable alternative sites available within the existing employment reserves.

Policy E3: Other Uses On General Employment Land

Designated general employment zones are primarily reserved for enterprise, general industrial and storage and distribution activities. Activities that do not fall within these categories will be considered in relation to their suitability to the location concerned, including the supply of available land. In the context of creating sustainable working environments, the Councils will also consider the use of General Employment lands to cater for the day-to-day need of working life, including cafés and childcare facilities and will support the creation of a vibrant business district. Proposals for development other than for business, commercial, general industrial, storage and distribution uses within identified general employment zones will only be considered where it can be clearly demonstrated that:

- a. They do not give rise to adverse environmental impacts; and

- b. They do not compromise the provision of a sufficient supply of general employment land for employment generating activities within the plan area; and
- c. Where the proposal is for retail uses they are ancillary to a permitted zoned use.
- d. Proposals for residential developments on land zoned general employment will not normally be permitted.

Some activities may be considered as inappropriate for a particular general employment zone location for environmental and amenity reasons, such as noise, vibration, smell, fumes, smoke, soot, ash, dust, etc. Shops and other retail activities aimed primarily at the general public will be excluded from general employment zone locations. However, retailing which is for trade purposes only or can be demonstrated as being ancillary to an industrial, or commercial business (i.e. not its primary purpose or business but open to the public), may be acceptable. Ancillary is taken as comprising 10% of floorspace or 10% of turnover devoted to non-trade sales.

The Councils consider it appropriate to ensure that industrial estates and land zoned for general employment purposes are able to fully serve their intended purpose without being restricted by the presence of other land uses, which are not compatible with or suitable for such locations. Industrial areas assist in the segregation of 'bad neighbour' uses from other areas of the town, in particular residential. While most business uses are readily accommodated, certain noxious industries are best excluded.

There is a need to protect environmentally sensitive areas, which are important for their conservation value for the benefit of current and future generations. Therefore, proposals for employment generating development will not normally be permitted on land within or close to designated conservation areas.

Mountain Top currently supports some 40 small and large businesses (including Highland Radio). In the lifetime of the Plan, the Councils will explore opportunities to establish an environmental improvement scheme at Mountain Top to separate pedestrians from vehicular traffic and improve the streetscape and quality of the local environment.

Policy E4: Developments in 'Commercial' zones

Lands zoned 'Commercial' within the plan have been designated as not being able to support industrial uses. These zones are more suited to commercial uses that generate employment but that are less intensive than industrial development proposals and are located along key arterial transport corridors, which are highly accessible. The Councils will support proposals that generate sustainable employment within these lands. The Councils do not view these lands as being capable of supporting heavy industries. All other employment creating development proposals within this zoning will be considered on the basis that: -

- a). They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network;
- b). They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and
- c). They will provide for a design and form that responds to the location of the lands as key landmark sites marking the commercial entrances into the town; and
- d). Comply with the Major Accidents Directive as set in Policy PI10.
- e). Provide for a proposed design that is of innovative architectural form in the context of the location of these lands at the entrance Gateways to the town.

Proposals will also be considered for developments within the commercial zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to retail and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.

Commercial zoning is applied to pockets of land, outside of the town centre zone, which is considered unable to support the more intensive development associated with the General Employment zone. The areas identified with this type of land use zoning are:

- Mountain Top, on the Kilmacrennan Road, which currently supports predominantly bulk retailing, car sales and the Highland radio station.
- The low rise predominantly garages and car-sales premises and existing Hotel along the N14/Port Road between the Dry Arch roundabout and the Port Bridge; and land to the immediate south of the existing Hotel at Drumnahoagh.

Policy E5: Home-Based Employment

Proposals for development which involve change of use or new development for purposes of home-based employment will be permitted where it can be clearly demonstrated that:

- a. **The proposal is of an appropriate scale for its location; and**
- b. **The proposal will not give rise to adverse visual aspects or negatively impact adjoining uses, traffic safety, and environmental or residential amenity.**

The Councils consider it vital to maximise the opportunities afforded for home-based working. Home-based employment can contribute significantly to the local economy, by allowing access to new markets, which provide new economic opportunities and encourage the spread of entrepreneurial activity and ideas. Home-based employment can also be beneficial in reducing the need to travel. Such development proposals will be considered in relation to the other policies and objectives of the Plan.

Policy E6: Tourism Related Development

The Councils will promote and support the establishment of a new landmark visitor facility on lands by the banks of the River Swilly, within the identified Town Centre area. The proposal will be linked to the leisure and recreational development of the riverside area.

Proposals for new or extended tourism related development elsewhere within Letterkenny will be permitted subject to:

- a. **Integration with existing holiday/tourism facilities; and**
- b. **Access through a variety of means of transport; and**
- c. **Car parking proposed in accordance with the standards established in the Plan; and**
- d. **Safe vehicular access to and from the highway; and**
- e. **Adequacy of access roads for the likely levels of traffic generated by the proposal; and**
- f. **There will be no adverse impact to any conservation interest, heritage interest, landscape or residential amenity; and**
- g. **Appropriate design that takes into account size, scale and materials of existing facilities; and**
- h. **The submission of a management scheme for the maintenance of the overall development including roads, footpaths, open spaces and services.**

Tourism is a major growth industry within Letterkenny, providing jobs and inward investment, yet the town contains no specific visitor attraction. One of the principal attractions of Letterkenny is proximity to nearby attractions including Glenveagh National Park, Newmills and the Inis Eoghan and Fanad peninsulas. The attraction of visitors provides particularly valuable benefits to the local economy by way of increased expenditure, job creation and strengthening of business. In addition, a focus on creating a high quality built environment within the town centre will contribute to the attractiveness of Letterkenny town as a tourist destination in its own right.

Throughout the Plan Area, the Councils seeks to promote the development of the tourism sector, by setting out a range of policies which seek to positively contribute to tourism related development and visitor impacts, by ensuring that accommodation and any tourist attractions are of a scale and character that will be compatible with the existing environment.

Policy E7: Visitor Accommodation

Proposals for holiday accommodation, including touring caravan and camping sites, will in principle be supported throughout the plan area. Proposals for visitor accommodation will be permitted where they can clearly demonstrate:

- a). That the proposal does not give rise to adverse visual impacts, or negative impacts to traffic safety, environmental or residential amenity; and
- b). Adequate landscaping measures to integrate the site into its setting; and
- c). Design and layout to make use of site topography and layout; and
- d). That the proposal does not prejudice existing provision or local amenity.

Tourist and visitor accommodation (hotels, visitors centres, guest houses, caravans, chalets, lodges, timeshare developments) can bring great benefits to the local economy. As well as facilitating traditional holiday tourism, accommodation plays an important role in accommodating the needs of business people. In addition, many hotels have a potential for acting as venues for a variety of conferences, seminars and field trips held by different organisations. Many of the buildings providing accommodation, especially the long-established hotels, make a positive contribution to the character of the local scene. It is therefore considered appropriate to maintain, improve and increase the provision of good quality accommodation.

Unserviced accommodation, in particular static and touring caravan and camping sites or chalet developments are currently lacking in Letterkenny. These provide a less expensive alternative to serviced visitor and tourist accommodation and are therefore generally encouraged by the Councils as they enhance the range of visitor accommodation available within the Plan area. However, these sites can lead to visual degradation if poorly located and screened. Where sites are prominent in the landscape, they can have a detrimental effect on the appearance and character of the area. The Councils will favourably consider the development of a touring caravan park facility within Letterkenny to provide for camping and touring visitors subject to a high quality of design, and assessment of siting and transport impact. Rigid formal layouts should be avoided, with stances/units separated to provide discrete locations/surroundings.

Policy E8: E-Commerce

It is the policy of the Councils to support E-Commerce as a sustainable source of employment. The Councils will aim to promote and improve the existing broadband infrastructure, which is key in the creation and sustainability of E-Commerce. The Councils recognise that E-Commerce may not necessarily require a shop frontage and as such would be sustainable in business parks and lands zoned for general

employment. As such proposals for developments predominantly associated with e-commerce will be permitted provided that: -

- a). The proposal is of an appropriate scale for its location; and
- b). The proposal will not give rise to adverse environmental and transport effects or be prejudicial to residential amenity.

In line with the national policy of promoting high value added employment, the Councils will support the continued promotion of E-Commerce investment. E-Commerce industries and services usually require a large number of well educated staff trained in information technology. Letterkenny Institute of Technology provides many IT and business based courses, graduates of these courses would be suited to the e-commerce sector. The Councils promotion of E-Commerce will be assisted by the commencement of 'Project Kelvin', this is a cross border initiative aimed at providing a high-speed fibre optic link between North America, Derry, Letterkenny and Monaghan. This project is scheduled for completion in late 2009 and will be receive 75% of its total cost (€43m) from the EU INTERREG IVA Programme Steering Committee for Ireland, Northern Ireland and Scotland. This vital piece of physical infrastructure will allow Letterkenny to attract new levels of investment within the E-Commerce sector.

Policy E9: Opportunity Sites

The Opportunity Sites identified on the land use zoning map offer a unique development opportunity by reason of their strategic location, scale, nature or current use. The planning frameworks set out for each 'Opportunity Site' on the following pages shall form a guide to the type of development that may be appropriate at each location. Any specific proposal that is not referred to in the planning frameworks shall be considered on their own merits subject to the constraints identified in the planning frameworks and subject to the proper planning and sustainable development of the area.

Within Letterkenny there are a number of sites which have been zoned for a specific use under previous plans, but that would lend themselves to an alternative use. These have been labelled opportunity sites as they have the potential for redevelopment for a range of possible uses, including new business, housing or leisure developments. In addition a number of the opportunity sites are located within the identified town centre and therefore are addressed in Part B, section 7.0 entitled Town 'Centre'. The planning frameworks for the opportunity sites excluding town centre sites are set out below: -

OPP 1: Extension to Town Park at Gortlee:

This site, bounded by the Town Park, DeValera, Ramelton and Gortlee Roads, and Whitethorn housing developments, comprises one of the few remaining significant woodlands within the town. The woodlands cover some 16ha of land stretching up to the Town Park. Within the woodlands there are a number of large open spaces, which are difficult to access. The site and the setting of Gortlee House are major environmental assets to the town. The Councils consider that this site has the potential to be sensitively developed for a mix of uses and the concept for developing the site will demonstrate the following elements:

- a). That the site is developed as a town park campus, retaining the substantive woodland cover of the site and providing for discrete pockets within which buildings can be introduced into an extended parkland setting;
- b). That pre- planning consultation be carried out with the Planning Authority;
- c). That the proposal provides for an extension of the existing town park linking through to Gortlee Road and providing for the conservation of the existing

- mature woodland cover with full public access. The substantive areas of new parkland space must be contiguous with and adjacent to the existing town park;
- d). The setting of Gortlee House is safeguarded when considered both within the confines of the site and from views into the site. In particular, no development will be permitted that curtails views to the house from the de Valera Road and from the junction of Gortlee and Ramelton Roads;
 - e). Uses exclude mainstream retail, and are compatible with the environmental setting of the site: e.g. specialist residential, apartments, offices, tourism or institutional uses may be appropriate;
 - f). A high standard of architectural quality is achieved throughout having regard to the nature of the site as an important landmark site. In addition, density within the site will be carefully considered having regard in particular to the heritage value of Gortlee House and the wooded nature of the site;
 - g). Vehicular access to the development is achieved via a new access improvement on Gortlee Road, subject to engineering and road safety assessment. Proposals to access the site from De Valera Road will only be considered where a clear justification is demonstrated together with evidence of minimal impacts with the town park, and subject to adequate and appropriate engineering and road safety both within the site and outside the site.
 - h). Pedestrian and cycle access will be required to link through the development connecting the Town Park, De Valera Road, Gortlee Road and the Whitethorn housing area.
 - i). The public parkland areas are served by footway and cycleway access, street lighting and park furniture as required by the Town Councils and provided by the developer.

The Councils will consider the adoption and maintenance of all public spaces and woodlands on the basis that title is transferred to the local authority at completion of the development.

Opp 2: Gortlee

This site is located along Gortlee Road where there is substantial residential development, the Church of the Irish Martyrs and a range of industrial and employment generating activities to the north of the site. This site presents an opportunity to integrate the conflicting uses of residential and General Employment by creating a buffer between the housing to the west and the General Employment to the East together with the development of the site as a neighbourhood centre supporting a mix of small local retail units and community services so as to enhance on the existing established neighbourhood amenities.

OPP 3: Donegal Creameries Site

The Donegal Creameries site is located on the edge of an established residential area and adjacent to 'General Employment' land use and zoning. The location is a transitional area between differing land uses and therefore any development proposal must give consideration to the creation of a buffer between the 'Residential' and 'General Employment' lands and have due regard to the protection of residential amenities. Notwithstanding, it is recognised that existing uses on the site are long established in the form of Donegal Creameries retail store and garden centre facility, associated offices, car parking facilities and the disused factory building along the Ballyraine Road. The redevelopment of this brownfield site is supported by the Councils for commercial, residential, tourism/leisure and small-scale retail uses with a maximum of 500m² for any neighbourhood shop. Pedestrian access to adjoining undeveloped lands will also be required.

OPP 4: Thorn Pier & Landing Stage

The site, which has a frontage onto the Swilly, is within a number of environmental designations such as SAC, SPA and it is also within the flood zone and adjacent to zoned green space. Subject to the amenity considerations related to the above and to adequate access arrangements, infrastructure and community considerations, the site could be the subject of a carefully designed Waterfront Regeneration Project introducing a number of appropriate commercial tourism/leisure uses. The Council would welcome the submission of a detailed design brief in regard to the site.

OPP 5: Former Town Port

The site occupies a prime gateway position into the town and has potential to represent a landmark development that reflects the Linked Gateway status of Letterkenny- Derry. At present, this gateway entrance is represented by the views of the art structure at Port roundabout, the tourist office building and also the Mount Errigal Hotel. Given the location of the site adjacent to the Swilly, proposals providing for commercial tourism/leisure facilities are considered appropriate. In this regard, development proposals shall demonstrate:

- a). That the proposal is of high architectural design including high quality internal and external specification, and that is of an architectural form that will represent a landmark quality structure at this key Gateway to the town.
- b). That the development addresses the river and integrates the river corridor into the design concept providing for public realm/amenity space.
- c). That any proposal must make provision for flood alleviation and flood risk management in line with policies NE8, NE9 and NE10.

OPP 6: South of River Swilly

The site is located south of the River Swilly. Proposals for redevelopment of these lands shall be required to consist of a detailed design concept that considers the integration of the proposed development with residential land (south) and town centre (north). In addition, the design concept shall:

- a). Demonstrate a range of uses in the areas of residential, apartments, tourism, offices and community uses. Mainstream town centre retail activities are excluded. In lieu, local neighbourhood retail activity serving residential development may be considered.
- b). Adequate provision of open space, public realm, pedestrian and cycle permeability.
- c). High quality architectural design
- d). Consideration of flood risk and associated mitigation measures having regard to the flood risk management policies contained in the plan.
- e). Consideration of further linkages and compatibility with residential lands south and the town centre north.

OPP 7: South of Swilly

The lands in question are located to the south of the River Swilly and the 'Town Centre'. The lands adjoin the River Swilly and consist of an existing walled graveyard whilst a proposed new bridge and proposed road alignment traverse the site. Having regard to the environmental and infrastructural issues arising, a masterplan approach to the development of these lands will be required. The over-riding objective of the masterplan is to ensure a balanced approach to the development of the lands in terms of the delivery of appropriate scale and built form set against the delivery of integrated and substantive open space proposals in the form of linkages, corridors and parkland space. Furthermore the masterplan will be required to include:

- a). A mix of uses that will exclude mainstream town centre retail activity but may include residential, apartments, offices, neighbourhood retail, bulky goods retail, car retail and hotel uses or institutional uses.
- b). The adequate provision of public open space both along the river corridor and within the overall site that provides for a high quality environment where access and permeability are paramount.
- c). Open space provision within the masterplan area will accommodate a graveyard and pedestrian river crossing.
- d). The provision of adequate buffer areas around the existing walled graveyard in such a manner so as to protect the integrity, context and setting of the graveyard whilst incorporating the buffer area within an overall open space concept for the site.
- e). Consideration of flood risk and associated mitigation measures having regard to policies NE8, NE9 and NE10.
- f). Consideration for further linkages and compatibility with residential lands south.
- g). Integration of the road and bridge structures in a manner that makes provision for a design and engineering concept that shall cause the structures to contribute positively to the strategic location of the site, to the open space/public realm concepts and to the setting of the walled graveyard.

Opp 8: Oldtown

Oldtown is well located in relation to the town centre, but is located within and adjacent to the Swilly Flood Buffer zone. This site represents an opportunity to provide a neighbourhood centre supporting some small local convenience retail, childcare and play facilities and other community services that would serve the Oldtown residential area.

OPP 9: Lands at Crieve to the south of the River Swilly

This area of land at Crieve represents an opportunity to consolidate both the established Oldtown residential area to the immediate southeast and the town centre area to the north. The site is bounded by the river Swilly to the north giving rise to significant flooding implications as the site is located within the flood risk area and proposals for development must demonstrate adequate flood protection measures and that there will be no contribution to or increase in the risk of flooding elsewhere. In addition, the use of Sustainable Urban Drainage Systems must be considered as part of any proposal. Uses will exclude mainstream retail and only be permitted where they are compatible with the environmental setting of the site e.g. specialist residential, apartments, offices or tourism. Any proposal will have due regard to the route of relief roads.

Opp 10: Former Mart, Sentry Hill

The site of the former mart is located in an area where education, religious and recreational facilities are clustered as well as a substantial level of high-density residential development. Having regard to the location of the site within walking distance of a range of community facilities and the town centre whilst having regard also to the significant associated car parking/traffic congestion, the former mart site would serve needs for social/affordable housing (particularly for the elderly in conjunction with the provision of an area for bus/coach parking for school and tourist use. In addition, any proposal for these lands will be required to reflect a high quality architectural design so as not to result in a negative affect to the character of the Cathedral 'Architectural Conservation Area'.

[OPP sites 11-15 see Town Centre Policies TC21-25)

Opp 16: Kiltroy

The former UNIFI site is a brownfield site where regeneration is sought through appropriate sustainable uses that have regard to the Plans other objectives and



policies for the Town. The approved infrastructural improvements to both the national and local road networks along with the permitted redevelopment of 'Plant 2' and a medical facility have initiated this process. Having regard to the potential of the site the site may include enterprise activity associated with the adjacent 'General Employment' lands in conjunction with specific provision for car showrooms, medical related facilities/services, leisure, sports (except sports retail) and related education facilities, wholesale warehousing and bulky goods retail warehousing. Proposals for retail uses that undermine the retail function of the defined town centre will not be permitted.

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7.0 Town Centre and Retailing

7.1 Introduction

This section sets out the Council's policies and proposals for town centre development and gives effect to Strategic objective 4; which states

Strategic Objective 4:

To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.

7.2 Background

People visit a town centre to have choice and variety in the range and type of shopping facilities on offer, to combine shopping trips with business, arts, entertainment and recreational activities. The strength of Letterkenny as a regional shopping destination and a centre for arts, culture and entertainment is already evident in the vitality and vibrancy of the town centre. Indeed the town centre already functions as the principal retail, arts, commerce, leisure and service centre within the County and boasts a quality retail offering, a museum, theatre, arts centre, state-of-the-art leisure centre and numerous restaurants bars and nightclubs.

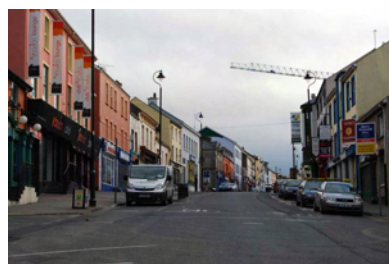
Furthermore Letterkenny's designation as a linked Gateway with Derry in the National Spatial Strategy implies that the town centre will have a pivotal role in the future, not only of Letterkenny, but the County and the entire North West Region as a whole. As a Gateway Letterkenny will have to sell itself on matter of 'quality of life' local amenities and environmental quality and image. Consequently an active, vibrant, diverse and attractive town centre is critical to its long-term success.

In turn the development of a coherent town centre development strategy with detailed spatial frameworks and detailed development management policies will be essential to the achievement of that goal.

7.2.1 Areas within the Town Centre

The overall town centre area in its entirety covers a considerable area of land at 163 hectares can be succinctly categorised into the following sectors:

- **Traditional Town Centre:** This covers an extensive area North and South of the Main Street and the Upper Port Road. It continues to act as the commercial core of the town and displays a vitality and diversity of functions not apparent in other areas of the town. The strong links between the arts, entertainment, traditional town services, (e.g. banking, legal) and independent retailing remain core strengths of this area. The quality of the built environment of the commercial core also contributes significantly to the shopping and visitor experience of the town. It is imperative that the vitality and vibrancy of the Commercial Core is maintained and expanded
- **Town Centre Residential Areas:** Residential development is dispersed throughout the town centre area in residential pockets, one-off houses apartments and above the shop, development. In particular there are two succinct residential areas within the town centre commercial core, namely



Rosemount Lane and Fortwell. These residential pockets are integral to the character and energy of the town centre area. Collectively such residential development contributes significantly to the vitality and vibrancy of the town and emphasises the need to promote residential development within the town centre.

- Paddy Harte Loop Road Retail Park Extension: The majority of new retail developments within the town centre over the past decade have been within purpose built 'retail units' in areas immediately adjacent to the Paddy Harte Loop Road. For the most part these consist of large format retail units, often containing 'branded' higher order national and multinational retailers within Retail Park setting with extensive parking frontage. As a consequence of the scale, density and nature of development the area does not have the vitality, vibrancy and diversity of uses evident in the town centre.
- Undeveloped Lands in the vicinity of the Isle Burn: Despite the favourable economic climate and the rapid expansion of the town in recent years there remains a significant portion of the area undeveloped.
- Other Areas: There are a number of areas within the overall town centre area which do not readily fall into any of the above categories namely the Letterkenny Shopping Centre and pockets of development either side of the Port Road between the Port Bridge and the Station Roundabout.



7.2.2 Town Centre Health Check

In the course of preparing this plan the Planning Authority conducted a comprehensive Town Centre Health Check. This health check included a variety of indicators including: building usage, retailer profile, the quantity of retail floorspace, vacancy rates, accessibility, car parking, pedestrian flow and environmental quality. The key findings of this health check are summarised below:

- The Main Street has a balanced and mixed distribution of complementary land uses, whilst the area of East of Pearse Road is predominately retail.
- The Main Street area remains the retailing, service, entertainment, cultural and social heart of the town and demonstrates a vitality and vibrancy and diversify not evident elsewhere in the town centre. The pedestrian survey found that the highest footfall continues to occur along the Main Street.
- There has been a significant increase (36%) in overall retail space in the period 2005-2008 and a considerable increase (63%) in bulky retailing floor space alone.
- Despite the growth in national/multinational comparison retailers the Independent retailing sector remains strong.
- Vacancy rates within the town centre as a whole were low at 3%, a significant proportion of which were newly completed units.
- That the private car remains the dominant form of transportation both to and within the town centre with 67% of respondents travelling by car.
- There is a significant supply of car parking spaces within the town centre, (7828) of which 4044 are public and 3784 are private.
- An audit of physical environmental quality of the town centre yielded:



- A positive result overall.
- High environmental quality for the main shopping streets of Main Street, Paddy Harte Loop Road and the Dunnes retail park.
- Low Environmental Quality on the streets/roads linking the Traditional Town Centre and lands East of Pearse Road.
- Negative scoring overall in terms of traffic intrusion, street furniture and planting.

In addition to the above health check a number of overall trends and issues area are apparent in the town centre and these are discussed below.

7.3 Development Trends and Issues

Letterkenny town centre has expanded rapidly in the buoyant macroeconomic climate of the previous plan. In particular retail floorspace has more than doubled throughout the plan period, and an influx of national and multi-national retailers have significantly added to the town's retail offering. As stated the traditional town centre continues to display a vitality and vibrancy within a strong multifunctional urban structure.

Nevertheless it is clear that there are a number of development trends which left unmanaged and unchecked may significantly hinder the achievement of the creation of a cohesive, multifunctional and high quality town centre.

In particular it is noted the area south east of the Pearse Road has become characterised by dispersed low density, mono-use and generally ad-hoc development forms with large areas of surface car parking, a relatively poor architectural character and an almost exclusive dependency on the private car as a means of transportation. In addition the widespread availability of large format retail units with car parking frontage within this area has led to the majority of new higher order retailers locating in this area.

In turn this has created a somewhat dysfunctional segmentation of uses. Increasingly the traditional town centre is dominated by; lower order retail units, banks, pubs restaurants and other general services, and struggles to attract and retain higher order retail outlets. On the other hand the area of east of Pearse Road boasts a range of leading high street, higher order retailers but has failed to attract a sufficient diversity of uses and consequently lacks the vitality of the traditional town centre. This functional segmentation has been attenuated by the physical barriers of the two lane one-way system of the Paddy Harte Loop Road/Pearse Road, which presents a significant obstacle to pedestrians moving into and within the newly developed retail area.

In addition the recent redevelopment of the Letterkenny Shopping Centre at the north-eastern extremity of the town centre has led to the establishment of the area as a retail destination in its own right.

These development trends, combined with the general nature of development has had a number of key effects namely:

- The creation of a dispersed, low-density and multi-nodal retail environment (both within the newly developed retail area and throughout the town centre), which necessitates car based travel and significantly hinders pedestrian movement.
- The location of the majority of higher order branded comparison retailers in the newly developed retail area.

- The creation of a newly developed retail area of inferior architectural character displaying a poor quality of public realm and almost exclusively dominated by retail uses.
- A lack of quality public spaces throughout and immediately accessible from the town centre.
- The fragmentation of the town centre into self-contained pockets of developments, which hinders the creation of a coherent town centre.



In view of the abovementioned issues and in order to achieve the strategic objective detailed at the start of this section it is necessary to have a clear and coherent strategy for the future development of the overall town centre. The strategy outlined below directly informs the specific policies in this section and in related areas of the plan.

7.4 Town Centre Strategy

In arriving at a strategy capable of delivering the vision detailed above, the Planning Authority considered the aforementioned issues, a range of possible strategic options and role of the Urban Design Framework. The strategic options considered ranged from allowing development to proceed in a 'business as usual' fashion to managing development on a phased basis.

Following consideration of the above the Planning Authority is of the firm opinion that in order to develop a consolidated, vibrant, accessible, multifunctional and high quality urban environment with a critical mass of development it is necessary to:

- Consolidate future Retail development within a defined town centre and expand retail development thereafter in an incremental fashion in accordance with the Sequential Test.
- Promote a higher density and greater diversity of development through backland, infill and mixed-use development.
- Focus certain developments within the town centre and promote the relocation of other uses to more appropriate locations.
- Guide the overall form and layout of future development in accordance with an improved Urban Design Framework, and develop certain urban blocks to specific design criteria.
- Ensure that all future development provides for a high architectural standard and contributes to a quality public realm in accordance with detailed and robust Development Management Policies.

In turn it is considered that the following complementary and self-reinforcing actions are necessary for the achievement of this strategy:

- Achieving a critical mass of development in the town centre by increasing overall densities, developing derelict underutilised sites within the town centre, consolidating new retail development within a defined town centre (and expanding retail development thereafter in an incremental fashion) and focusing certain forms of development within the town centre.
- Developing a mixed-use town centre by requiring that all new developments provide for a diversity of town centre uses including Retail, Services, and Residential Development.

- Creating a more coherent, and interlinked town centre through the achievement of critical mass, the establishment of quality linkages and promotion of a diversity of uses throughout the town centre.
- Establishing new streets with active street frontages by ensuring that new developments provide for a mixture of active uses, at a human scale, along architecturally pleasing and visually engaging facades.
- Further refining the template offered by the urban design framework by identifying specific layouts and design criteria for the development of key urban blocks within the framework.
- Ensuring a higher quality of public realm, and engendering a distinct sense of place by; promoting a finer grain of overall development, permitting buildings and ancillary spaces of only the highest architectural design and finish, and ensuring a rigorous adherence to the urban design framework with regard to development form, layout and open spaces.
- Establishing a pedestrian friendly town centre, through the consolidation and densification of development, prioritising pedestrians over private vehicles in the design and layout of development, the improvement of key pedestrian crossing points and the reservation of routes for pedestrian and cycling linkages.
- Building a sustainable land use transportation model by promoting mixed development within the town centre and ensuring that all future, layouts, road alignments, and pedestrian linkages are based upon the Urban Design Framework accompanying this plan.
- Conserving and enhancing of built historic and architectural heritage of the traditional town centre by promoting the retention, or where appropriate, sensitive redevelopment of the town's built heritage.
- Facilitating the relocation of lower order activities and certain retail activities (e.g. light manufacturing, wholesale, vehicle retailing) to other areas of the plan by restricting the future location and/or expansion of such uses within the town centre.

By carefully managing new development in accordance with this strategy, and the related actions and policies within this section and by promoting an acceptance of this vision by architects, developers, planners alike it is considered that the strategic vision for the town centre can be delivered upon.

7.5 Town Centre/Retailing Objectives

In order to achieve the strategic objective for the town centre the Planning Authority proposes the following Retail Objectives:

- Achievement of a critical mass of retailers within a defined town centre, and the expansion of retail activities thereafter in an incremental fashion.
- Provision for of a diversity of different retailing types (comparison and convenience) and sizes throughout the town centre.
- Creation of an attractive retail environment in terms of overall design and the quality of the public realm.
- Establishment of a strong and competitive retailing environment including a strong independent retailing sector.

Development of an integrated retail environment accessible by a range of transportation modes.

7.6 Policies

Policy TC1: Adherence of Development Proposals to the Town Centre Strategy.

All Development proposals shall demonstrate overall compliance with the town centre strategy detailed above. Proposals, which the Planning Authority consider would conflict with, or hinder the achievement of, this strategy, will not be permitted.

The town centre strategy provides a clear expression of the Councils objectives for Letterkenny town centre in order to consolidate development in the town centre and to continue to improve its overall environmental quality. In the first instance Development proposals within the town centre area will need to demonstrate that they will not conflict with, or hinder the achievement of this strategy.

Policy TC2: Adherence of Development Proposals to the Urban Design Framework

Overall Requirement:

All Development Proposals, within the Town Centre shall adhere to the Urban Design Framework [Map 6 refers] in terms of; development forms/layouts, the provision of street frontages/active frontages, building setbacks, the protection of existing and the provision of new linkages, the development of open spaces (including positively addressing and incorporating adjacent areas of open space within development proposals).

Requirements within the Town Centre West of the Isle Burn/Isle Lane:

In the area West of the Isle Burn/Isle Lane the Urban Design Framework identifies specific development forms/layouts, and linkages, including exact development blocks, block arrangements, active frontages and internal roadways/linkages. In addition to the overall requirements detailed above development proposals in this area shall adhere to the specific requirements of the Urban Design Framework in this regard.

Notwithstanding this the Planning Authority may consider large scale development proposals in this area, which provide for alternative layouts in terms of block arrangements, internal linkages etc provided that the development proposal:

- Provides for a comparable grain of development in terms of the size of individual blocks.
- Creates a strong urban form with buildings, streets and places of a human scale.
- Provides for the creation of the key urban spaces identified in the framework.
- Achieves a similar density of development.
- Provides an equivalent level and quality of pedestrian permeability including providing for the major internal and external pedestrian linkages identified in the framework.
- Otherwise meets the specific requirements of Urban Blocks 1-4 as identified in Policies 20-23.

Requirements within the Town Centre East of the Isle Burn/Isle Lane and in Urban Block 5

In the area East of the Isle Burn/Isle Lane and in Urban Block 5 the Urban Design Framework identifies more general development areas/layouts and more approximate road linkages and building setbacks. This allows for a more flexible approach in view of the Greenfield nature of the area. Notwithstanding these more

general requirements, development proposals in this area shall be expected to provide for:

- The creation of distinct development blocks within an overall grid structure.
- A fine grain block and plot size (with block edges not greater than 80m in length).
- A strong urban form with buildings, streets and places of a human scale.
- Street Frontages and Streetscape along both the linkages identified in the Urban Design Framework and the edges of the blocks created within/by specific development proposals.
 - Such frontages shall provide for buildings to front directly onto the street with building setbacks only in so far as to accommodate sufficient space for footpaths, cyclepaths, kerbside parallel parking and (where appropriate) small areas of private space fronting residential developments. In exceptional cases a greater building setback will be permitted to accommodate suitably landscaped public open space or variations in setback to promote visual interest.
- An overall development density suitable for a town centre environment.
- Quality pedestrian linkages within the development and between it and the adjoining development blocks.
- Public spaces within larger development areas.
- Active frontages along key sections of the street frontage in accordance with Policy TC17.

In recent decades the development of Letterkenny in an ad hoc and piecemeal manner in the absence of a detailed masterplan has significantly detracted from the ability of Letterkenny to develop a strong urban structure with a quality townscape. The Urban Design Framework, adopted under the 2003-2009 Letterkenny and Environs Development Plan specifically aimed to rectify this by providing a macro scale vision for the future development of the area known as the town centre extension area in the previous plan.

This framework detailed the form and layout of future development, set out strategic road alignments and pedestrian linkages and identified key urban places, and open spaces. This included inter alia; the identification of an avenue along Pearse Road, 'Railway Place' a key urban space at the junction of Justice Walsh Road and Pearse Road, a Linear Park connecting the traditional town centre with the Public Services Centre and Riverside parks along the Isle Burn and the River Swilly.

The Planning Authority considers that this framework continues to provide the overall vision for the town centre. Nevertheless it is clear that more intricate and detailed policies/spatial frameworks (in relation to building design and usage, linkages, frontages and development form/layout) are necessary at the micro scale, to achieve that same vision.

Consequently this plan includes a modified and more detailed Urban Design Framework encompassing the entire town centre area and sets out strengthened micro scale policies aimed to give effect to same. In order to achieve the spatial vision contained therein it is imperative that future development proposals adhere to the published framework and to the related policies elsewhere in this section.

Policy TC3: Mixed Use Development Policy in the area identified as the Traditional Town Centre.

New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the traditional town centre shall demonstrate that the proposed

usage shall not detract from the objective of creating a vibrant and mixed use town centre. In addition such uses shall be reflective of the development's/building's location within the town centre. Larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.

Policy TC4: Mixed Use Development Policy in areas other than the Traditional Town Centre.

New Developments, the redevelopment or the change of use of existing buildings or parts of same, shall provide for a diversity of uses within the development/building in question. In addition, larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.

Mixed-use developments are essential in the creation of vibrant, and diverse town centres which support vitality and sustainable modes of transportation.

Letterkenny's traditional town centre (including the Main Street) continues to provide a variety of different uses (e.g. shops, banks, restaurants, offices and residential accommodation). Consequently it displays vitality, generally lacking elsewhere where buildings are often exclusively dedicated to a single use (e.g. retail). In order to address this situation it is considered appropriate to adopt a robust and proactive mixed-use policy whereby new developments shall be expected to provide for a range of uses. Elsewhere in the town centre developments will be expected to demonstrate that they do not detract from the objective of creating a vibrant, mixed-use town centre.

Policy TC5: Design Criteria in the Town Centre

Development proposals in the town centre shall only be permitted where they:

- Provide for distinctive buildings of high architectural quality, which contribute to a distinct sense of place and a quality public realm.
- Adhere to the building lines set out in the Urban Design Framework or where same is not identified adhere to the established building line.
- Provide for a fine grain of development in terms of overall scale, fenestration size/proportions, signage, and detailing.
- Promote visual interest through modulation and detailing of architectural elements (e.g. variation in building elevations, variations in roof form, cornices, windows, eaves, frontages and entrances and minor variations in setback).
- Provides for a minimum 3-storey development along the Pearse Road and 2 Storeys elsewhere in the town centre.
- Avoids the use of industrial type cladding.
- Avoids the use of cladding or glazing of extensive areas of the proposed development.

The traditional town centre of Letterkenny generally displays a high quality vernacular streetscape with a fine grain appearance. However outside of the traditional town centre the overall architectural quality of the town centre is relatively poor and is often dominated by large scale buildings which make extensive use of industrial type materials and finishes. However the varied mix of architectural styles through the extended town centre does not lend itself to a prescriptive approach with regard to design. Nevertheless it is imperative that all future development proposals provide for buildings of high architectural character, with a fine grain appearance appropriate

to their town centre setting and which contribute to the creation of a quality public realm.

Policy TC6: The Ecclesiastical Quarter Architectural Conservation Area

It is a policy of the Council to implement an Architectural Conservation Area, herein described as 'The Ecclesiastical Quarter ACA'. Accordingly it will implement the relevant policies at Part B, section 2.0.

The Architectural Conservation Area previously referred to as the 'Cathedral Precinct' in the Letterkenny & Environs Development Plan 2003-2009 (as varied), has been refined and is now referred to as the 'Ecclesiastical Quarter'. Architectural Conservation Areas, hereafter referred to as ACA's, consist of groups of buildings, structures and other elements which when viewed together are of a high architectural quality and are deemed worthy of protection. This area is an important location within the town centre where there are significant opportunities to spread the urban design qualities that exist in the ACA to the streets and areas surrounding and leading to Main Street.

Policy TC7: Town Centre Streetscape

It is the policy of the Councils to protect and enhance the quality of the 'Town Centre Streetscape' as identified on Map no. 6.

The 'Town Centre Streetscape' which forms the spine tying the historic core of Letterkenny together runs from the roundabout at the bottom of Ramelton Road, up High Street and along Main Street, past Market Square, and down Lower Main Street. This east/west corridor, designated as the town centre streetscape provides the clustering of activities and the historic, cultural and heritage material to help enrich the public realm. Vibrant streetscapes and civic spaces are defined by surrounding buildings but have their own distinctive character which forms a coherent interconnected network of places that support social interaction and display a hierarchy of private, commercial and civil functions.

The beauty and opportunity in Letterkenny town centre lies in its diversity, between the larger scale retailing activity in the east of the town centre and the more intimate street pattern of the historic town centre. This opportunity is to be explored and celebrated providing a diversity in experience to both the resident and visitor. The character of the town is created not just by an array of individual buildings of good architectural quality, but by total settings, the relationship of the building to the space in which they are located, and most importantly the way the ordinary buildings in the town relate to the grander ones. Respect for design is demonstrated in the way new buildings are inserted into the framework of the existing townscape, on the one hand respecting its scale and form, while on the other producing contemporary architecture of the highest quality.



The promotion of design quality is seen as an essential part of Development Management. The Councils have therefore placed an increased emphasis on urban design and the need for vision and ideas for the 'town centre streetscape', seeking to ensure that new development respects the street and site, fits with its surroundings and suggests ways of doing this such as to have respect for and reflect local proportions and plot sizes using quality materials. To inform this process, the Councils propose to prepare and publish a Character Appraisal of the Town Centre

Streetscape of Letterkenny including feasibility and informed photographic reference to inform Design Guidelines to be provided as an addendum to the plan.

Policy TC8: Shop fronts along the 'Town Centre Streetscape.'

It is the policy of the Councils to:

- a) Ensure the retention of traditional street-fronts as appropriate.
- b) Only approve alterations to existing traditional shop fronts if the proposal is an improvement on what exists. Particular care will be taken over proposals for the installation of blinds, canopies, security grilles and shutters to avoid harm to the visual amenity of the shopping streets, if acceptable in principle they must be designed as an integral part of the shop front design.
- c) Avoid pastiche shop fronts and facades.
- d) Encourage contemporary design resolution where appropriate avoiding cautious pastiche, considering security lighting and shutters, additional security measures as necessary, signage and advertisements.

Shop fronts form the core of the Main Street providing for a vibrant and active shopping experience. Care is to be taken in the specification detailing of shop fronts, whereby high quality design will tend to promote the town as a retail centre of excellence.

Policy TC9: Traditional town centre

It is the policy of the Councils to reinforce the traditional town centre as the heart of the town, to increase its vibrancy and improve its environment. (Map No. 5 Refers)

Policy TC10: High quality sustainable vibrant town environment

It is the policy of the Councils to ensure the traditional town centre streetscape of Letterkenny is preserved and enhanced to create a high quality sustainable vibrant town environment.

Policy TC11: Promotion of attractive town centre

It is the policy of the Councils to promote an attractive town centre atmosphere which would encourage additional trade and business to the traditional town centre encouraging increased footfall along the historic streetscape of the town.

Policy TC12: Improvement programme

It is the policy of the Councils to initiate a programme encouraging ongoing improvement in street fronts in order to attract more quality businesses to Main Street.

Policy TC13: Management of 'Town Centre Streetscapes.'

The Councils will manage the 'Town Centre Streetscape' (Map No 6 Refers) as follows:

- a) All refurbishment restoration and development proposals within the 'Town Centre Streetscape' will respect the character of existing buildings, important views and spaces and historic settlement pattern in terms of scale, height, density, grouping, design and materials along the designated 'Town Centre Streetscape' and always of the highest design quality.
- b) Existing buildings adding to the character of the town centre streetscape should not be damaged or demolished. There is a presumption in favour of the retention of buildings that are of traditional form and are of cultural or heritage value.

- c) The Councils will promote the sensitive re-use of existing buildings and encourage quality repair and maintenance carried out with appropriate materials and to a high standard of workmanship.
- d) The Councils will seek to retain all original features which are important to the character of the buildings along the Town Centre Streetscape such as entrances, chimney stacks, doors, windows and materials.
- e) The Councils will ensure all development within the designated town centre streetscape should reflect and interpret the specific character of the streets, responding to and reinforcing the townscape, landscape, scale, materials and topography, and always of the highest quality regardless of the conceptual approach adopted.
- f) The Councils will reinforce the value and importance of the green spaces in the town and the natural topography of the area in relation to the protection, enhancement and promotion of the 'Town Centre Streetscape.'
- g) All planning applications will be accompanied by a design statement clearly outlining the concept and design approach chosen in relation to the development of buildings and/or sites along the designated spine.

Policy TC14: Landmark Buildings.

Proposals for the development of new buildings or the redevelopment of existing buildings on the sites designated as Landmark sites on Urban Design Framework shall not be permitted unless they provide for a distinctive landmark building of high architectural merit in terms of design, character, materials and finishes.

In any urban area there are a number of sites (e.g. at prominent corners, at the junction of important streets, or developments at the termination point of important views) of specific visual importance. Such sites deserve specific attention with regard to design, materials, finishes etc and which present a particular opportunity to create a landmark building of high architectural value. In this regard the planning authority have identified a number of such sites where development proposals will be expected to result in the creation of landmark building of high architectural merit.

Policy TC15: Protection of Short views and Prospects of Special Amenity Value.

It is a policy of the Councils to protect the identified Views and Prospects of Special Amenity Value [Map No. 6 refers]. Developments, which obstruct, detract from or otherwise compromise the architectural character, setting, streetscape, or general visual harmony of the view in question, shall not be permitted.

Every urban area has a number of key views and prospects, which make a significant contribution to the overall townscape and character of the area. Such views may be of a key landmark building(s), groups of buildings, or simply the overall streetscape, which because of their architectural, aesthetic, historical character or quality makes a distinct impression on the viewer. Many of the views will be long established and in some cases iconic.



As Letterkenny grows and develops some of these sensitive views and prospects may come under development pressure, which if not properly managed may compromise their architectural and aesthetic value to the overall townscape. Consequently it is important to identify such views and formulate development management policies, which will actively protect and enhance such views.

Policy TC16: Protection/Enhancement of Key Linkages:

Developments, which obstruct, narrow, physically encroach upon, otherwise restrict the safe use of the established or potential linkages identified in Map No 6: 'Urban Design Framework' shall not be permitted.

The promotion of sustainable modes of transportation (such as walking and cycling) and the creation of vibrant town centre are mutually reinforcing objectives. The Town Centre currently possesses a number of key pedestrian linkages (e.g. Church Lane, Rosemount Lane), which greatly improve permeability within the town centre and to the surrounding residential areas. The Planning Authority has also identified a number of future strategic pedestrian linkages, which if realised have the potential to greatly enhance the permeability and the vitality of the town centre. Consequently it is a policy of the Council to both protect and enhance existing linkages and to safeguard the routes of such future strategic pedestrian linkages.

Policy TC17: Promotion of Active Frontage within the town centre.

New development proposals, or the redevelopment of existing properties, in areas determined or considered by the planning authority to be 'active frontage' in the Urban Design Framework (map no.6), shall provide for the creation of an attractive, high quality urban environment that promotes commercial vitality and pedestrian amenity:

- a) **Developments are built to the building line identified on the urban design framework.**
- b) **Buildings create a human scale and visually engaging façade by:**
 - (i) **The modulation and detailing of architectural elements (e.g. minor changes in sets backs, variation in roof lines, entrances, window detailing).**
 - (ii) **Ensuring that building forms along street frontages are broken down into narrow horizontal distances, which create a human scale and maintain visual interest.**
 - (iii) **The avoidance of large expanses of blank walls, or frontages exclusively devoted to display.**
- c) **The development, in combination with existing and permitted development in the immediate vicinity, provides for the occupation of ground floor units by a variety and mix of active uses (e.g. Convenience & Comparison Stores, Cafés, Restaurants) directly accessible from the street through the provision of a range of different unit sizes. In larger developments smaller units shall be interspersed with larger units.**
- d) **Buildings shall provide a minimum of two full storeys of useable floorspace along the full street frontage of the site.**
- e) **Car parking provision/arrangements in accordance with Policy TC18.**

Policy TC18: Quality Residential Development within the town centre

New development proposals, including proposals for the redevelopment of existing developments shall adhere to the following requirements in relation to the arrangement/layouts of car parking, manoeuvring and loading spaces.

- **With the exception of on street parking provided in the manner described below, car parking manoeuvring and loading areas, where appropriate, shall be located to the rear of buildings, or through alternative appropriate internal parking arrangements (e.g. basement or multi-storey parking) which do not hinder the creation of strong street frontage.**
- **Car parking/loading spaces provided along the road/street frontage (i.e. to the front of buildings) shall:**
 - o **Be arranged parallel to the street frontage.**

- Not amount to more than 50% of the overall street frontage.
- Be grouped with an equal length of free kerbside between each group.
- Where it is not physically possible or desirable to locate parking in accordance with the above provisions, the developer shall be expected to provide a financial contribution to the shortfall in Car Parking in line with the Technical Standards contained within the plan and the applicable Development Contribution Scheme.
- In primarily residential developments within the town centre a more flexible approach shall be taken to application of the above parking policy. However in such locations, developments shall be expected to employ appropriate alternative solutions (e.g. small areas of grouped parking, basement parking, courtyard parking etc) in order to achieve a strong urban form in the design of such developments.

Adequate and strategically located car parking provision is an essential component in successful contemporary town centres. However in recent years the preference by both consumers and retailers to have/provide parking immediate to individual retail units has manifested itself in the creation of retail park type developments with large areas of surface car parking fronting same. This form of development has in turn led to the creation of a dispersed low-density urban form, which significantly hinders pedestrian access and mitigates against the creation of quality urban places. In addition the Town Centre Health check indicates that Letterkenny has sufficient (7828 spaces) car parking spaces located within a reasonable walking distance of the majority of retail developments.

Consequently it is considered necessary and appropriate to ensure that the location and design of future town centre car parking promotes the creation of strong urban form with a quality streetscape. Accordingly the above policy seeks to ensure that new town centre parking provision over occurs parallel to street/road frontages or to the rear of buildings.

Policy TC19: Quality Residential Development within the town centre
Residential Development proposals, which provide for the creation of high quality liveable and sustainable residential neighbourhoods within the area of the town centre will be considered where:

- The development (when taken in conjunction with existing and permitted development) would result in the direct physical extension and consolidation of the urban form.
- They satisfy all of the criteria below:
 - Provides direct and quality pedestrian access to the town centre.
 - Is capable of being directly served by existing or future local public transport connections.
 - Creates buildings and spaces of high architectural quality.
 - Provides for an overall density appropriate to a town centre location and in accordance with Government Guidelines on Residential Density.
 - Locates car parking spaces within easy reach of the main entrances to dwellings.
 - Provides a mix of residential unit types, sizes and styles, (e.g. town houses, apartments, duplexes etc) capable of promoting long term occupation patterns by a range of different occupants.
 - Provides quality open space passively supervised by residential units.
 - Slows and Calms vehicular traffic through the layout of buildings and ancillary spaces and more traditional traffic calming measures (e.g. ramps).
 - Overall layout and design creates a strong sense of place and containment.

- **Otherwise complies with the Housing Policies contained within this plan and with relevant National Guidelines on the design of residential development within urban areas.**

The Mixed Use Developments policy in this section, aim to diversify the range of uses within the town centre by ensuring that all new developments provide for a mixture of uses including quality residential development. However it is considered that there is an opportunity to develop self-contained liveable and sustainable residential communities within the town centre, which would significantly bolster the population and significantly add to the vibrancy of same. As such it is considered that proposals which are for the creation of residential communities should be considered within the town centre subject to specific safeguards and criteria.

Policy TC20: Location of Certain Types of Retail Development.

Proposals for the development of new, the extension of existing, or the change of use of buildings to: Car Retailing Showrooms/Lots, Builders Merchants or large scale outlets predominately dedicated to the wholesale trade, will not be permitted within the area defined as the town centre in Map No. 5.

Certain types developments such as Car Retailing Showrooms/Lots, Warehousing, Builders Merchants and outlets predominately dedicated to the Wholesale trade, tend to occupy relatively large plots of land and on a low-density basis and generate significant and frequent movements of larger vehicles (articulated lorries, transport vans etc). As such they hinder, and are generally incompatible with, the creation of a Vibrant, Compact, High Density, Pedestrian friendly and Mixed Use Town Centre. Moreover such uses can be more appropriately accommodated in edge of centre locations, which enjoy easy to roads networks for such traffic types and where the requisite land holdings can be more easily assemble.

Policy TC21: Town Centre Urban Block 1: (Opportunity Site 11 Main Street/Church Lane Backland Area)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions. Such proposals shall provide for a high quality mixed use town centre development with a range of retail unit sizes capable of accommodating higher order retail developments, centred upon a direct pedestrian linkage between Main Street, and the upper part of Church Lane (or alternatively Ard O'Donnell road) fronted and passively supervised by an active streetscape. In addition any development proposals should provide for:

- **A high quality element of public realm and streetscape within the development that is accessible and incorporates a mix of complementary uses.**
- **A high architectural quality and a fine grain appearance (in terms of design, finishes and materials) throughout.**
- **Development of a scale and architectural form that will not detract from the character and quality of the Cathedral Quarter or the Architectural Conservation Area.**
- **The protection of uninterrupted views of the Cathedral from all vantage points in the plan area.**
- **The protection, in so far as possible, of the residential amenities of the adjoining established residential areas.**
- **Detailed assessment of and proposals for vehicular access, traffic management, parking and loading. A car-parking shortfall will be permitted for the non-residential elements of the development where it can be demonstrated that adequate alternative car parking provision exists within the town centre and can be easily accessed from the site.**

A significant tract of undeveloped backland (approximately 2.7 hectares) located immediately north of the Upper Main Street was identified in the previous development plan as an opportunity site for 'developing retail and commercial floorspace'.

Notwithstanding challenges with respect to land assembly and vehicular access it is considered that this site represents a unique opportunity to consolidate town centre development including higher order retail activities, in the immediate vicinity of the Main Street. As such the Planning Authority considers that the development of the site is key to maintaining and enhancing the vitality of the traditional town centre.

Policy TC22: Town Centre Urban Block 2: (Opportunity Site 12 Cultural/Recreational/Public Administration Quarter)

Proposals for the Development/Redevelopment of the site shall contribute to the creation of a Civic/Cultural/Recreational Quarter and shall be for civic/public administration, arts, or tourism uses. The Planning Authority may also consider commercial uses such as proposals for the evening economy where they are compatible with the overall vision for the quarter. In addition any development proposals shall provide for:

- Innovative and high quality architectural design and a quality public realm in terms of building design and ancillary public spaces.
- Adequate accessibility and permeability in terms of walking and cycling, to the site and to the adjoining civic/ public amenities.

This Opportunity Site is located in the immediate vicinity of the former swimming pool, and is located adjacent to An Grianán Theatre, the Regional Cultural Centre and the Tennis Club. The clustering of the above mentioned developments has resulted in an area that effectively constitutes a Civic/Cultural/Recreational Quarter within the town centre. This situation in combination with the recent vacation of the Old Swimming Pool creates an opportunity to further add to the critical mass of civic/cultural/recreation uses within the immediate area. Consequently the Planning Authority will support uses on the site that contribute to the establishment of a Civic/Cultural/ Recreational Quarter such as civic/public administration, the arts, or tourism subject to the policy outlined above.

Policy TC23: Town Centre Urban Block 3: (Opportunity Site 13)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions, and designed to provide a pedestrianised mixed use, civic quarter with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:

- A high quality pedestrian street with appropriate hard and soft landscaping treatments, lighting and street furniture along the axis shown in the Urban Design Framework.
- High quality pedestrian linkages, with appropriate landscaping, lighting and street furniture between the site and retail developments to the southeast and southwest along the indicative lines shown on the Urban Design Framework.
- High Quality Active Street Frontages in accordance with Policy TC17 along the frontages designated as 'Active Frontages' in the urban design framework.
- A civic square or similar publically accessible open space with appropriate hard and soft landscaping elements and incorporating a artistic landmark feature.
- Public Toilets located adjacent to the civic square identified above.
- Craft/Artisan uses are acceptable within this area.

In recent years significant development has occurred within and along the edges the one-way system around the Paddy Harte Loop Road/Pearse Road. Much of this development has been characterised by low density, mono-use developments of inferior architectural character. The area has little streetscape and no identifiable focal point, which might attract a critical mass of development and so generate a high-density area of town centre character.

Nevertheless a significant proportion of land within the block bounded by the one-way system remains undeveloped or is need of regeneration. In addition it is apparent that pedestrian linkages through the town centre remain weak and underutilised. The area is also strategically located at the southern end of Oliver Plunkett Street and equidistant from many developments within the town centre extension.

The abovementioned situation creates a unique opportunity to create a new high quality mixed-use civic quarter with a critical mass of development, which would act as a focal point for, and would enjoy easy access to/from the majority of developments within the wider town centre. The development would create a strategic north/south-linking axis, successfully linking the newly developed town centre area with the traditional town centre.

Policy TC24: Town Centre Urban Block 4: (Opportunity Site 14)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan based on in-depth preplanning discussions, and designed to provide a mixed use, urban environment with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:

- A mixed-use urban environment with provision for a mix of retail units capable of providing both larger former higher order retail development and smaller retail units.
- Building Setbacks in line with the setbacks identified on the Urban Design Framework for 'Railway Place' and the Linear Park.
- A distinctive landmark building on the corner site at the north western and north eastern extremities of the site in line Policy TC14.
- Continuous Active Frontages along the lines identified in the Urban Design Framework and in accordance with Policy TC 17.
- The subdivision of the block between the Linear Park and the Paddy Harte Loop Road to provide key pedestrian linkages in accordance with the Urban Design Framework.
- Specific hard and soft landscaping proposals on both the Linear Park and Inner public space identified in the Urban Design Framework.
- Specific proposals for the 'Railway Place' including:
 - Hard and soft landscaping features such as street furniture, lighting, green areas, bicycle-parking provision etc.
 - The identification of vehicular and pedestrian spaces (including sufficient definition between same), and pedestrian crossing points.

Policy TC25: Town Centre Urban Block 5: (Opportunity Site 15)

Proposals for the development/redevelopment of this site shall be subject to a detailed masterplan based on in-depth preplanning discussions and designed to provide mixed-use urban environment with a superior architectural quality and a high quality public realm. In particular development proposal(s) should provide for:

- A building layout which:

- Screens and softens the visual impact of the retail warehousing directly to the north (when viewed from the southern slopes of the Swilly), whilst maintaining the service access to the rear of same.
- Fronts, positively addresses and sensitively integrates the riverside park along the River Swilly in any design proposals.
- A significant degree of residential development fronting the banks of the river Swilly.
- The Key linkages (both to and within the site) identified in the Urban Design Framework.
- High quality, public open space(s), passively supervised by the surrounding development with a minimum of car parking along its edges.
- The avoidance of large areas of surface car parking.
- The Retention of the mature trees situated at the southern extremity of the site on the northern bank of the Swilly and the incorporation of same into any overall landscaping proposals.

7.7 Retailing

7.7.1 Government Guidance on Retail Development

In January 2005 the Department of Environment Heritage and Local Government published revised Retail Planning Guidelines (RPG). These guidelines provide a framework to guide local authorities in preparing development plans and assessing retail planning applications

7.7.2 Regional Planning Guidelines 2005 (DoEHLG)

The guidelines identify the accommodation of additional retail development in an efficient, equitable and sustainable way as a key planning challenge. In particular the guidelines stress the importance of establishing the optimum locations for new retail developments, which is accessible to all sections of society and which allows for the continued prosperity of traditional town centres.

In turn the RPG specifically identify five key policy objectives, of equal importance, namely that:

- All development plans should incorporate clear policies and proposals for retail development.
- Retail Policies should support a competitive and healthy retail environment.
- Retail Developments should be accessible by both public and private transport.
- Applications for retail development should be subject to the sequential test which states that:
 - Town centres are the preferred location for retail developments.
 - If no development sites area available within the town centres then the next preference should be a location on the edge of the town centre.
 - Only where there are no sites available, or potential sites, within a town centre or on its edge or satisfactory transport accessibility realistically cannot be ensured within a reasonable period of time should out of centre development be contemplated.
 - That there should be a presumption against large retail centres located adjacent or close to existing new, or planned national roads/motorway unless such centres where situated within an Integrated Plan Area in a Gateway where the road network has sufficient capacity to cater to the scale of development.

Moreover the RPG state that when assessing Retail Planning applications, Planning Authorities should consider the Impact of the development on vitality and viability of established town centres (particularly in the case of retail parks).

The guidelines recommend that planning authorities carry out a health check appraisal in order to identify areas of weaknesses and opportunity, to formulate appropriate planning responses and to develop a realistic vision for the town centre. In addition the guidelines state that development plans should, interalia:

- Confirm the retail hierarchy and the role of centres.
- Define the core shopping area of town centres.
- Assess the requirement for additional retail floor space.
- Provide strategic guidance on the location and scale of retail development.
- Identify criteria for the assessment of retail development.

In addition the RPG infer that the above matters should be addressed in either a more detailed Retail Strategy or a statement of strategic intentions and general policy.

7.7.3 Retail Categories and Trends

There are two broad categories of shopping facilities. Firstly, there are those that sell 'convenience' goods (i.e. food and drink, various domestic items including cleaning and washing products, toiletries and pharmaceutical products). Secondly, there are those that sell 'comparison' goods (i.e. clothes, electrical equipment, house furniture, carpets and DIY equipment) for which the consumer generally expects to invest time and effort into visiting a range of shops before making a choice. These facilities include retail warehouses and department stores.

During the last two decades, the general pattern of shopping has changed quite dramatically in response to increased consumer spending, customer demand and the requirements of both retail operators and consumers.

A key trend has been the retailer demand for larger format stores and shopping facilities in order to maximise the range and number of goods sold and thereby achieve greater economies of scale. This trend has been reinforced by a general consumer preference for bulk buying in combination with private car usage. Collectively these trends have resulted in considerable pressures for the development of retail parks in close proximity to well developed road links.

A number of other trends which have caused significant changes in the retail landscape in recent years, both nationally and internationally are also apparent, namely:

- The growth of the 'discount' foodstore, such stores have expanded rapidly in recent years and in particular brand names such as 'Lidl' and 'Aldi' have made significant inroads into the Irish groceries sector.
- The growth of Internet based shopping which is increasingly attracting a significant amount retail expenditure on comparison goods.
- The increasing domination of retailing by a number of key brand names in both the convenience and comparison retailing sectors and agglomeration of retailers.

In turn these trends present additional challenges in terms of the planning and development of town centres namely:

- Maintaining vibrant town centres with a mix of independent, national and multinational retailers.
- Accommodating larger format retail units within traditional town centres whilst maintaining design quality.
- Preventing the drift of comparison retail outlets to 'out of town' retail parks.

7.7.4 Town Centre Health Check - Retail

Specifically the Town Centre Health Check, referred to on page, found that in relation to retail development:

- There has been an overall increase in retail space of 36% in the period 2005-2008 resulting in a total existing and permitted retail space of 102,344m². This included a considerable increase (63%) in bulky retail space alone.
- The main street area remains the retailing, service, entertainment, cultural and social heart of the town and demonstrates a vitality and displays a vibrancy and diversity not evident elsewhere in the town centre. In particular the pedestrian survey found the highest footfall continues to occur along the main street.
- The town possesses a relatively strong comparison-retailing sector in the town occupying 32% of the overall number of business premises in the town.
- The town boasts a relatively strong independent retail sector with a 3:1 split between independent retailers and national/multinational retailers. However it was noted that this Independent sector was largely dominated by service activities (38% of total independent business outlets)
- The town centre had a significant supply of car parking spaces - 7828 of which 4044 are public and 3784 are private.

In addition to these specific issues a number of overall retail trends are also apparent and worth noting.

7.7.5 Specific Retail Trends and Issues in Letterkenny

In common with the rest of the state Letterkenny has enjoyed a period of sustained economic boom in the years prior to and during the period of the Letterkenny and Environs Plan 2003-2009.

Undoubtedly this situation has significantly added to the overall vibrancy and range of operators within Letterkenny's retail offering. In particular the area south east of the Pearse Road now boasts a range of branded comparison retailing formats including interalia: Tempest, Next, TX Maxx, Argos, Atlantic Homecare, Marks and Spencers, Halfords, Homebase and Dunnes and has significant unused capacity to attract additional stores of a similar format. The growth of the discount food store sector has also been evident with both Lidl and Aldi now operating in the town. The traditional town centre continues to display a strong and diverse independent retailing sector and a vibrant retail sector.



However this favourable economic climate in combination, with the above trends and preferences by both retailers and consumers and the creation of an extensive town centre extension area in the previous development plan has manifested itself in the

majority of multinational 'branded' higher order comparison retailers establishing themselves in large format retail warehouses.

As a consequence of this trend and of the lack of specific development management policies much of this development has been haphazard in nature and the area now displays a generally poor built environment and a restricted range of uses. This situation in turn threatens its overall attraction as a retail destination. In tandem with this trend the traditional town centre struggles to attract and retain such higher order comparison retailers and is increasingly dominated by lower order retailing activities and general services. Letterkenny's proximity to the border also presents additional threats/opportunities for the town's retailing sector, namely that of Euro/Sterling currency fluctuations and general price differentials between the two currency areas on the Island.

In turn it is considered that a clear and coherent Retail Strategy is necessary to achieve the above objectives.

7.8 Retail Strategy

The County Donegal Retail Strategy 2002-2011 effectively served as the retail strategy for the Letterkenny and Environs Development Plan 2003-2009. This Strategy inter alia, recognised Letterkenny as the most important retail and commercial centre in the County, afforded it the status of a Tier 1 centre in the County's hierarchy. In addition it was a policy of this Retail Strategy to promote and encourage major enhancement of retail and leisure provision in Letterkenny.

As part of the review of the County Donegal Development Plan 2006-2012 a new Retail strategy, for the entire county of Donegal including Letterkenny was prepared. However the Letterkenny and Environs Development Plan 2003-2009 was not varied to incorporate the updated Retail Strategy for the County. Accordingly it is considered necessary and appropriate to incorporate a retail strategy, compatible with the abovementioned countywide Retail Strategy within this plan as the statutory Retail Strategy for same.

This amended Retail Strategy (which is attached in full with this Plan) inter alia:

- Acknowledges Letterkenny as the primary retail destination in the County and places Letterkenny-Derry at the top of the Retail Hierarchy for the County.
- Specifies that new Retail Development must be located in accordance with the sequential test.
- Identifies the general planning criteria which retail developments should be considered against, including:
 - Impact of the development on the vitality and viability of the town centre.
 - Accessibility by sustainable modes of transportation.
 - Impact on vehicular traffic flow.
 - Design Quality and compatibility with the Urban Design Framework.
 - Impact on historic streetscape and protected structures.
- Establishes a wide range of preferred and recommended retail uses for Letterkenny.
- Reiterates the retail objectives identified above and detailed actions necessary to achieve same including:
 - Ensuring proposals for retail development adhere to the sequential test, form part of a mixed use proposal, provide for a mix of unit sizes, and are of high design quality.

- Promoting retail development at key backland locations adjacent to the Main Street and at strategic locations within the town centre.
- Enhancing existing and developing new pedestrian linkages between the Traditional Town Centre and the remainder of the town centre.

In turn the retailing and town centre policies contained within this section of the plan are designed to give effect to the above strategy and achieve the stated retail objectives.

7.9 Retailing Policies

The Council policies in relation to retailing are set out below:

Policy RT1: Retail Proposals and the Retail Strategy:

Proposals for retail developments shall be considered in accordance with the amended objectives, frameworks and associated policies of the Retail Strategy contained in Volume 2 of this plan.

Policy RT2: Location of Retail Development:

Proposals for retail development shall be subject to the sequential test whereby:

- The area defined as the Town Centre (See Map 5: Town Centre Strategy) is the preferred location for Retail Development.
- Retail Development outside the Town Centre will only be permitted where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within the Town Centre
- If no development opportunities are available within the Town Centre, then the next preference shall be a location on the Edge of the Town Centre
- Retail Development will then only be permitted outside of the Town Centre and Edge of Town Centre areas where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within same.
- In addition to the above where a case is made for retail development outside of the Town Centre developers will be required to demonstrate that:
 - There is a demand for additional retail provision.
 - The development will not negatively impact on the existing standard of retailing or the overall vitality and viability of the defined Town Centre. The Council will seek a formal Retail Impact Assessment in circumstances where it is considered that the development might have a potential adverse impact.
 - The development can be accommodated at the specific location without contributing to ad hoc or haphazard development form or significantly hindering the capacity of the town to develop a compact urban form.
 - The development will be serviced by existing or proposed public transport links and will be easily accessible (in terms of distance and quality of linkages) from the town centre by both pedestrians and cyclists.
 - The development will be adequately serviced by existing infrastructure networks including roads, water, telecommunications, sewerage etc.

The Councils will apply a sequential location test in assessing the suitability of all sites for retail development outside the Town Centre area. One of the notable weaknesses of the Letterkenny retail offer is the dispersal of retail activity across the urban area and along the arterial approach roads. The sequential test aims to ensure that town centre vitality and viability is protected and enhanced by consolidating development within a defined Town Centre.

Under this test the preferred location for retail and shopping uses will be the Town Centre as defined Map No. 5: 'Town Centre Strategy'. If no suitable sites are available within the Town Centre, the next preference will be for edge of centre sites and finally out of town locations.

The Planning Authority considers there are ample development opportunities currently available within the Town Centre for a variety of proposals. Development proposals within the town centre are clear opportunities to strengthen the physical urban form of the town. Such proposals, including those in backlands and within Urban Blocks 1,3, & 4 [Map 6], must be based on the provision of strong pedestrian and vehicular linkages through the town centre and be designed to provide a quality urban streetscape. In addition the planning authority consider that the potential for larger retail development in traditional town centre, through the sensitive amalgamation of individual retail units/buildings, remains virtually untapped. The sequential test does not apply to retail proposals located within the defined town centre.

Policy RT3: General Criteria for Retail Developments:

Proposals for retail development will only be permitted where they:

- **Comply with the sequential approach outlined in the Retail Planning Guidelines and the locational Policies for Retail Development contained within this plan.**
- **Provide safe and easy access to/from the development by pedestrians, cyclists and disabled persons. In particular large scale retail developments shall demonstrate that they can be serviced by existing or proposed public transport links, local, regional and national.**
- **Comply with the car and bicycle-parking standards contained within Volume 2 of this Development Plan.**
- **Are of a high design standard and satisfactorily integrate with the surrounding built environment and comply with the built environment policies contained with this plan.**
- **Do not negatively impact upon the flow of vehicular traffic in either the immediate vicinity of the development or in the wider area.**
- **Provide adequate arrangements for the collection, attenuation, and discharge of surface water and otherwise comply with the Flood Prevention Policies contained within this plan.**

In addition to the above major development proposals may be required to submit Traffic Impact Assessments as part of the planning application. Proposals may also be required to address flood risk issues particularly in the Isle Lane area but also in Lower Main Street and the Port Road area and/or submit Flood Impact Assessments in accordance the flooding policies outlined in this plan. Developments which entail major additions to retail floorspace in the town centre, may be required to provide, or contribute towards the provision of extra parking spaces in the town over and above that set out in the technical standards accompanying this plan. However, for applications which comply with the policies and proposals of this plan in all material aspects, it should not be necessary for applicants to provide additional supporting background studies.

Policy RT4: Neighbourhood Retail Outlets

Proposals for neighbourhood retail outlets, of up to 300m² in size (this size restriction includes public retail floorspace space, and excludes storage areas and ancillary facilities) or extensions of less than 50% to an existing shop, which are intended to primarily serve a neighbourhood need, will be considered outside of areas defined as 'retail core' and 'edge of centre'.



The provision of small, local convenience shops and other retail outlets and services is essential to ensuring the vitality of residential neighbourhoods. Local shopping facilities play a crucial role in promoting social inclusion and reducing the need to travel. This policy is applicable throughout the urban area of Letterkenny and is particularly encouraged in existing and new residential areas where there is currently no such suitable provision.

Policy RT5: Ancillary Retailing

Development proposals for ancillary retail development, (i.e. retail developments ancillary to Industrial, Light manufacturing, and Service type activities) outside of the defined retail core will only be permitted where such retailing operations are ancillary to the business as a whole. The size of the retail space shall not exceed more than 10% of the total indoor space of the business in question.

It is considered reasonable that certain commercial activities such (e.g. light manufacturing) are able to dedicate a certain amount of floorspace to ancillary retail activities accessible to the general public (e.g. sales/display areas). Nevertheless this situation must be balanced against the need to protect the vitality and vibrancy of the town centre. Consequently it is considered appropriate to limit ancillary retailing to 10% of the total indoor space of the business in question.

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8.0 Transport & Movement

8.1 Introduction

Transport and movement is interrelated with a broad range of issues within the plan area. This chapter sets out to provide a policy framework to support the implementation of strategic objectives 3, 4, 6, & 7 of the plan which state:

Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.

Strategic objective 4:

To consolidate the town centre and promote the area as a quality urban environment through the establishment of design quality and public realm, improvement of permeability and access throughout, management of pedestrian and vehicular traffic, promotion of alternative modes of transport and enhancement of the architectural heritage of the town centre.

Strategic objective 6:

To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.

Strategic objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny-Derry, in particular the growing population and economic activity.

8.2 Background

The need for an integrated approach to be taken to land use and transportation is vital so as to provide a framework for the supply and release of land for development purposes set against clear transportation requirements and priorities. In other words, the land use patterns and objectives of the plan area will affect the types of trips that people want or need to take and will therefore impact on a transportation strategy in relation to walking, cycling, private car and public transport. To comprehensively provide a spatial planning framework through the development plan process that integrates land use with transportation, the Councils have instigated the preparation of an 'Integrated Land use and Transportation Study' that will contribute to further policy review.

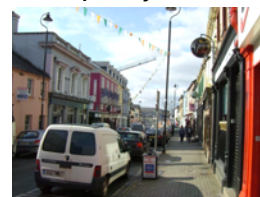
Notwithstanding the scope and detail of the 'Integrated Land Use and Transportation Study' this plan gives due consideration to transportation issues so as to, in the first instance, set appropriate aims and objectives in the plan that identify a clear vision for the Gateway and subsequently to provide adequate policy framework that moves in the direction of achieving integration, permeability, and sustainable transport options.

The delivery of a successful integrated land use and transportation strategy is paramount in the future success of the Gateway. Improved movement and permeability within and to the town will negate against criticisms of peripherality, make the town more attractive to investors and business, will provide for greater

choice of movement, negate against social exclusion due to improved accessibility options, have significant positive environmental impacts and improve quality of life.

The critical transportation issues at present include:

- Dominance of car based development.
- Road traffic congestion throughout the town particularly at peak times.
- The lack of alternative sustainable transportation options.
- Land use patterns that encourage car usage.
- Lack of permeability throughout the town.
- Closed cell neighbourhoods.



The challenge of this plan including a future 'Integrated Land Use and Transportation Study', is to provide a clear strategy for the encouragement of alternative sustainable forms of transport that are such so as to be an attractive and real alternative for people living, working or visiting Letterkenny.

In a regional context, continued improvements in the existing networks to Derry City (including City of Derry Airport), Belfast, Dublin, Sligo together with new and innovative alternative transport options to these locations, will assist in achieving the critical mass and relative employment base that is associated with the linked Gateway status.

8.3 Transport & Movement Objectives

The objectives in relation to transport & movement in Letterkenny are as follows:

1. To analyse land use and transport in a coordinated and integrated manner.
2. To provide for a coordinated and planned linked transport network.
3. To support and promote improved regional access.
4. To improve traffic congestion throughout the town particularly in the town centre.
5. To promote, support and encourage modal shift to walking and cycling.

8.4 Transport & Movement Policies

The Councils transport & movement policies are set out below:

Policy T1: Letterkenny Integrated Land Use & Transportation Strategy

It is the policy of the Councils to prepare an Integrated Land Use & Transportation Strategy, comprising a strategic overview of transportation issues in the town and addressing a range of issues including urban cycling, pedestrian movement, reduced mobility concerns. The Strategy will focus strongly on:

- Integration within and between different modes of transport
- Integration with the environment
- Integration with land use planning
- Integration with policies for education, health and wealth creation.

In order to influence the continued development of the town and to ensure a more accessible and attractive town in which to live and work, it will be the policy of the Councils in the interim, to:

- a). Ensure that all new development complies with the Traffic Management Guidelines 2003.
- b). Facilitate Urban Transportation Control - the identification of key Urban Junctions, a coordinated signal system to manage movement into and around the town, through which pedestrians and cyclist are given equal weighting with traffic.
- c). Facilitate Town Centre Parking and Traffic Management - Land assembly, charging policy and enforcement.
- d). Facilitate Public Transport - Establishment of integrated infrastructure and support measures for the ongoing operation of the Letterkenny Town Bus service and the development of sustainable public transport, for example through Quality Bus Corridors or future rail links.
- e). Facilitate People Friendly Environments - measures, including Urban Junctions, to allow for the easy and safe movement of pedestrians and those with limited mobility or other needs in order to allow for comfortable, quality public and residential realms.
- f). Facilitate cycling and walking - A linked network of safe routes throughout the urban area, including safe routes to schools in partnership with other stakeholders.
- g). Facilitate new road construction - in accordance with Policy T7 and the prioritisation of infrastructural improvements required to enhance Letterkenny as a growth centre.
- h). Facilitate increased permeability - ensuring new development increases the incidences of linkages and flow of both public and private traffic, including pedestrian and cycle, throughout the town development envelope.
- i). Facilitate the development of a Transport Interchange Hub - Developing an integrated transport interchange hub thereby allowing for a more efficient, sustainable and dynamic transport model linking to and around the town.
- j). Facilitate new ways to travel - Encouraging and facilitating the use of green travel plans by both public and private interests, providing training and advice on implementation and safety.
- k). To facilitate transportation and landuse integration - a major focus on the efficient linking of landuse to transport allowing for easy and sustainable movement of people and vehicles, creating opportunities for the servicing of development by efficient public transport modes and creating opportunities for green travel planning.

Global concerns regarding over-reliance on car based transport are now affecting the town of Letterkenny in a more radical way than ever before. The major concerns include:

- Congestion
- The effect of road traffic on the environment (both natural and built)
- Discrimination against vulnerable groups in society such as the poor, the elderly and the disabled
- Instability in oil supply and price control.

It is acknowledged that an integrated strategic overview is required to co-ordinate development led initiatives within the Plan and target public investment in a meaningful and sustainable way. A new emphasis on alternative modes of greener transport, whether they are private or public, must be to the forefront of future transportation policies. To this end, the Councils have instigated the commissioning of 'The Letterkenny Integrated Land Use & Transportation Study.'

The study shall be formulated in the greater interests of adopting a more sustainable approach to land use & transportation throughout the Plan area. The purpose of the study shall be to alleviate the current negative transportation issues experienced within the town, and direct landuse planning in the most efficient way to ensure greener transport servicing and sustainability.

The resultant strategies for land use & transportation shall be carried forward into the operational policy of the Letterkenny & Environs Development Plan through future review processes in line with the statutory procedures of the Planning & Development Acts 2000-2006.

Policy T2: Strategic Road Links to the Town

It is the policy of the Council's to safeguard national investment, by preventing the premature obsolescence of strategic road links to the town, by not permitting direct frontage access to the N13 and N14 within the Plan Area.

The Councils will also limit the intensification of existing access points where issues of road safety arise. This is supported by Policy T8 of the County Donegal Development Plan 2006 -2012, and National Roads Authority policy, which advises against development requiring direct access to a national primary or national secondary route in the area outside the 60 km speed limit.

The National Routes are of vital importance, providing accessibility at a local, regional and national level and stimulating the social and economic development of the town and its wider region. However private access points taken directly from a national road and inadequate control on frontage development may prejudice safe and convenient traffic flows, into and out of the town and therein also have a significant negative impact on the investment in the first instance.

It is an aspiration of the Council to have an 80km speed limit introduced along the stretch of the N14 between the Dry Arch roundabout and the Port Road roundabout and to remove the right turning option from this route.

For planning purposes, in terms of Development Management, (access arrangements), National Roads Standards will be applied to the Ramelton Road R245 to the Golf Course Road Junction, from the Port Bridge Roundabout to the Ballyrairie Creamery Roundabout and up to the (previously known as) Unifi Site Junction.

Policy T3: Multi Modal Strategic Link - N14 Dry Arch roundabout to the Port Road roundabout

It is the policy of the Councils to reserve a 'Multi Modal Strategic Link Corridor' (as identified on the Map No. 4, 'Transport Map') between the N14 Dry Arch roundabout and the Port Road roundabout to facilitate future further expansion, the provision of QBCs (Quality Bus Corridors) and other possible future transport innovations so as to ensure that the town shall be quickly, safely and efficiently serviced and to reduce journey time into the town.

This link is of major strategic importance as it is the main link between the town and National Road network, and so to the rest of Ireland and providing linkage to onward international access.



Policy T4: Rail Corridor

It is the policy of the Council to ensure that the old railway line, running parallel to the N14 Dry Arch roundabout to Port Road roundabout along with all other intact railway lines within the plan area, shall remain free from development for possible future re-instatement within the national rail network.

While Letterkenny no longer has rail access, the Councils remain committed to reinstating rail travel from Letterkenny to Derry City and Sligo. Effectively the development of this rail corridor would complete the all Ireland rail circuit, proving an important tourist resource and will ensure the future proofing of the plan, allow for future transport innovations and compliment recent studies examining options for rail infrastructure.

Policy T5: Transport Interchange Hub

It is the policy of the Council to facilitate the development of a new Transport Interchange Hub in order to ensure a multi modal transport system for the town. This shall indicatively be located at lands close to the Port Road roundabout as indicated on the Map No.4: 'Transport Map'.

The identification of a spatial planning framework to integrate the development of innovative and sustainable transport measures is vital in terms of ensuring that new development patterns do not prejudice the options available for the future. The identification of lands for the purpose of a transport interchange hub is central to the delivery of alternative modes of transport as this is the key connector of networks and options that may be made available to the town.

Policy T6: Strategic Roads; Traffic and Transport Assessment

It is the policy of the Councils on Strategic roads to:

- a). Implement the NRA's Traffic and Transport Assessment Procedures for all Planning Applications. Details of the TTA procedure are set out in Appendix A Development Guidelines and Technical Standards (County Donegal Development Plan 2006-2012, Section 2 Transportation and Communications).
- b). Require that a Road Safety Audit must be carried out as part of any development that involves a change to the existing road layout, in accordance with the NRA DMRB¹ HD 19/01 Road Safety Audits HA 42/01 Road Safety Audit Guidelines.

Policy T7: New Strategic Relief Road Development & Urban Road Improvement Around The Town

The Councils seek to improve access into, through and around Letterkenny through the further upgrade and development of Urban Roads and the identification and provision of new Strategic Relief Road Corridors. (See Map No. 4 'Transport Map'). The roads and corridors identified are an indicative width of 20 metres.

For planning purposes, in terms of Development Management, all identified Strategic Relief Road Corridors shall be subject to National Roads Standards. Those lands adjacent to and affected by Strategic Relief Road Corridors have been identified for special consideration (See Map No. 4: 'Transport Map'). Development proposals which are located within the lands identified shall:

- Consult with the Councils Transport Authorities, namely the Roads & Transportation Service, Town Engineer & the National Roads Design Office (NRDO), prior to the submission of any planning application.

- Be required to demonstrate and satisfy that the proposal will not inhibit the future development of the corridor.
- In the case of residential development, comply with the policies for quality residential development set out in Part B, section 3.0 of this plan, and as endorsed in the Department of Environment, Heritage & Local Government document entitled, 'Sustainable Residential Development Planning Guidelines' and the accompanying 'Urban Design Manual' including the highest standards regarding safety, design, building orientation, building lines and frontage in order to increase street usage and vitality and using grid layouts showing through linkages to adjacent lands to allow for future ease and dispersal of movement.
- Achieve excellence in road corridor landscaping, including Avenue planting in order to develop attractive entrances to and views of the town.
- Take account of the National Roads Authority "Guidelines for the Treatment of Noise & Vibration on National Roads" in order to avoid nuisance to development users.
- Anticipate operational and environmental impacts and shall be subject to Environmental Impact Studies where appropriate.
- Provide for the development of public transport 'pick up'/'drop off' points, shelter facilities and future road widening to accommodate increased capacity and/or the provision of public transport corridors to the satisfaction of the Councils.

The Strategic Relief Road Corridors are:

- Southern Strategic Relief Corridor, joining the Leck East, Leck West and Swilly Diversion Routes.
- Western Strategic Relief Corridor, connecting Ballymacool and Glencar via Rodgers Burn.
- Northern Strategic Relief Corridor encompassing the Windyhall Route.
- Eastern Strategic Relief Corridor, joining the N56 (New Link Road) and Bonagee Diversion Routes.

Urban Road programmes include the upgrading and rationalisation of the Cullion Road, strengthening to sections of the R250 (Glenties) and strengthening of the R245 (Ramelton) and the development of new roads as appropriate (See Map No. 4: 'Transport Map').

It is anticipated that the development and upgrade of roads, and ancillary infrastructure, such as Urban Junctions, may be financed largely from direct financial contributions resulting from development proposals. In certain circumstances the Councils may establish 'Supplementary Development Contribution Schemes' to facilitate implementation. Specific definitions and standards for setbacks and development within road corridors are set out in Volume 2 Development Guidelines and Technical Standards. Technical Standards and Site Development Requirements are updated periodically. Applicants should refer to the latest additions available on the Council website or links found therein to EU and Department of Environment, Heritage & Local Government sites.

Policy T8: Traffic & Transport Assessments

Proposals for development likely to generate significant traffic problems shall:

- **Consult with the Councils Transport Authorities, (Roads & Transportation Service, Town Engineer & NRDO), in order that Traffic Impact Assessments are scoped and agreed prior to undertaking.**
- **Submit a Transport Impact Assessment.**



Where a Traffic and Transport Impact Assessment identifies necessary off-site improvements for the development to be able to proceed, the developer will be expected to fund the improvements by entering into a formal agreement with the Councils.

Policy T9: Traffic Management Programme

It is the policy of the Council to implement a programme in relation to Urban Junctions. This programme will involve a linked signal system to manage movement into and around the town, through which pedestrians and cyclists are given equal weighting with traffic.

Policy T10: Parking standards

Proposals for development must comply with the Council's Car Parking Standards as defined in Volume 2, Development Guidelines and Technical Standards. New development must provide the minimum cycle and car parking standards, as set out in Development Guidelines and Technical Standards on the site or by way of a development levy to a public car or cycle parking scheme.

The Councils recognise that in some circumstances, such as development along Main Street, it may not be possible or even desirable to provide car parking. In such cases the Councils may wish to provide a centrally located car park rather than individual spaces for each development, and shall seek financial contributions from the developer in lieu of physical car parking spaces.

Provisions for cycle parking refer to sufficient space to access and park a standard full size bicycle conveniently, along with any structures necessary for the security of the said bicycle when so parked.

Policy T11: Cycling and Walking

The Council will promote the development of cycling and walking as a viable transport option. To do so, all development proposals shall be accompanied by appropriate levels of provision for cycle and pedestrian movement including:

- Covered secure cycle parking which is convenient and located to allow for informal surveillance
- Pedestrian and cycle friendly routes throughout new residential areas
- Footpaths and cycle provision in order to adequately and conveniently access public transport, services/amenities and connect with the wider locality.

Cycling and walking are environmentally friendly, fuel-efficient and healthy. They should be a key means of travel to work, school, shops and other amenities. The overall purpose of the policy is to reduce reliance on the private car by having a greater regard for sustainable movement patterns for local journeys especially to local schools.

Secure cycle parking is recognised as a direct encouragement for people to make better use of bicycles for a range of trips. The Councils shall ensure that, where new developments are proposed, people have the encouragement and opportunity to use bicycles or walk where possible.



The Councils shall prepare a cycle route network for Letterkenny as part of the preparation of the Integrated Transportation & Land Use strategy (see Policy T1 above). In order to assemble a network of cycle routes, the Councils will require

cycle provision in all developments. These will be required to link with existing or planned networks and will be sought as a developer contribution if outside the development site. The Councils shall also require that, in particular, new educational and community facilities shall make provision for connection to the through movement of pedestrians and cyclists.

In implementing the above the Councils shall work in partnership with the providers of Community/Education services and other facilitating/interested bodies in order to formulate safe routes and policies.

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9.0 Physical Infrastructure

9.1 Introduction

This chapter relates to physical infrastructure setting out to provide a policy framework to support the implementation of strategic objective 7 of the plan that states:

Strategic objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny- Derry, in particular the growing population and economic activity.

9.2 Background

The provision of state of the art physical infrastructure that can accommodate the scale of growth anticipated for the linked Gateway is a critical element of the future success of the town. Physical infrastructure means for example, that there is adequate and safe volume of water supply, that wastewater treatment complies with European requirements and has the capacity to service the needs of the town, that broadband is widespread and efficient, that electricity supply is available and reliable, that surface water management is adequate and safe to balance new development with the characteristics of the aquatic systems.

The benefits of ensuring a high quality physical infrastructure are environmental, social as well as economic. The eradication of pollutants to the environment by providing safe and efficient physical infrastructure processes is vital in terms of supporting the aims of European designated sites (NHA, SAC, SAC) and in supporting and promoting the biodiversity quality of the town and the opportunity to develop wildlife areas or wildlife corridors. The protection of these key environmental resources and integration of these resources into the urban structure enriches the diversity of the town and has knock on benefits in delivering a quality place that has a sense of place and a unique character and therein is an attractive place to live and visit. Therefore, the social benefits are such that health and recreational opportunities are prioritised and enhanced. In terms of the economic benefits, high quality and reliable infrastructure will negate the criticisms of peripherality and provide for greater accessibility of the town to the regional, national and global markets. Therefore, in simple terms, assurances regarding such matters as electricity, water supply and wastewater treatment are essential in attracting inward investment and are considered as basic requirements for successful new business.

The incremental growth of the town outwards from the core, as set out in the growth strategy at Part A, section 2.0 of this development plan, will assist in maximising the public and private investment that is required to deliver key physical infrastructure projects. The consolidation of the urban form and development of critical mass means that the benefits of investment to individuals can be multiplied and value for money can be achieved.

9.3 Physical infrastructure objectives

The objectives in relation to physical infrastructure in Letterkenny are as follows:

- To co-ordinate growth nodes in the town with the delivery of key physical infrastructural projects.

- To ensure that existing and planned physical infrastructure is adequate to cater for the future growth of the linked Gateway.
- To achieve the eradication of environmental pollution as a result of inadequate physical infrastructure.

9.4 Physical Infrastructure policies

The Councils physical infrastructure policies are set out below:

Policy PI1: Power Provision

The Councils will collaborate in the work of Bord Gais and ESB, to identify suitable corridors for conveyance of gas and electricity infrastructure. Where such corridors are identified, the Council will not permit developments which compromise their ability to be used for the conveyance of piped gas lines or overhead cables.

Access to adequate power supply is an essential requirement to service industrial and commercial development within the Plan Area and to attract new investment into Letterkenny.

Demand has phenomenally increased as a consequence of the unprecedented growth in the Plan Area. Whilst the existing network has been tailored to the town structure and is able to meet current demands, there is a need to ensure the sustainability of distribution capacity to service substantial new developments, particularly any major new employment generating activities.

Natural Gas, has the benefit of not only improving the efficiency of existing economic activity, but contributes to enhancing the physical environment, improving the attractiveness of a region for inward investment and thus improving the national and local economies. The opportunities to coordinate the provision of natural gas with Derry are substantial especially since the town has been identified as a linked Gateway with Derry. In the context of the promotion of Letterkenny for economic growth, the Councils are seeking to encourage and enable transmission routes to facilitate increased access to natural gas.

Policy PI2: Location of Electricity Power Lines

In light of the quality of the environment around parts of Letterkenny, such as Gortlee, Rodgers Burn and particularly Kilty and the Swilly environs, the Council will enter into discussions with ESB to ensure that, where practicable, power lines be routed underground.

It is recognised that power lines can be unsightly, particularly in sensitive landscapes. This policy recognises the importance of visual quality and environment. Therefore it is the intention of the Council that every effort is made to reduce the visual impacts of structures by requiring that all new power be supplied by subsurface distribution. In all circumstances the Council's preference is for energy infrastructure to be located underground.

Policy PI3: Telecommunications

The Council will continue to work with the telecommunications industry to develop and extend the broadband infrastructure servicing Letterkenny to ensure the availability of up-to-date facilities.

Broadband telecommunications infrastructure is one the most valuable strategic tools to attract investment into Letterkenny. The Letterkenny Metropolitan Area Networks (MAN's) Programme was constructed as Phase I 2003. The network comprises fibre

optic cable and ducting below the ground through the major streets of the town along with the building of a co-location facility to house telecommunication equipment for suppliers of broadband telecommunication services.

Policy PI4: Erection of Telecommunication Facilities

Proposals for the erection of masts, antennae or ancillary equipment shall be required to accord with the following:

- a). To provide an orderly development of the telecommunications infrastructure throughout the Letterkenny area, in accordance with the requirements of the 'Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities - 1996'; and,
- b). To adopt a presumption against the erection of antenna in proximity to residential areas, schools or community facilities, due to the potential of public health risks.

The Governments telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services. National policy requires that all development should conform to the concept of environmental sustainability meeting socio-economic objectives sensitively. The Councils will consider the location of masts and ancillary equipment in accordance to proper planning guidelines. In considering proposals for the erection of new telecommunications facilities, no new masts will be permitted within residential areas, the town centre, existing school premises and future school sites. The design of the structures should be simple and well finished. They should employ the latest technology in order to minimise their size and visual impact. The evidence concerning the health risks associated with telecommunication structures is inconclusive. Telecommunications investment is paramount to the further economic and social development of the Letterkenny area although the Councils will adopt a precautionary approach in respect of public health.

Policy PI5: Water Supply

The Councils will seek to provide adequate and sufficient water supply in order to meet current capacity requirements together with future projected need. Proposals that cannot demonstrate that an adequate water supply can be achieved will not be permitted.

The existing limitations on water supply represent a significant difficulty having regard to the projected growth over the period to 2020. In recognising the importance of efficient and reliable water supply, the Councils, through the Directorate of Water, Environment & Emergency Services, have identified a series of strategic actions/projects to upgrade and augment supply. This involves a number of projects including:

- Water conservation.
- Boreholes scheme at Ballymacool.
- Lough Greenan Scheme.
- South Letterkenny Water Supply Scheme.
- Letterkenny/Lough Mourne Scheme.

The growth strategy of this plan assists in the drive to ensure adequate and efficient water supply by reinforcing an incremental growth of the town outwards from the core together with evidence led and objective led release of 2nd phase of residential land.

Policy PI6: Wastewater Services

The Councils will seek to provide adequate and sufficient wastewater treatment in order to meet current capacity requirements together with future projected need and to eradicate environmental threats.

To deliver the appropriate wastewater treatment to serve the current and future needs of the town, the Councils, through the Directorate of Water, Environment & Emergency Services have undertaken the Letterkenny Sewerage Scheme Waste Water Treatment Works. The project involves the design, build and operation of wastewater treatment works and sludge management centre. Works are targeted to commence in 2009

Policy PI7: Groundwater Source Protection

The Councils will seek to ensure that potable water sources are protected and to avoid contamination of groundwater sources. Therefore, proposals for on site treatment and disposal of wastewater shall not be permitted.

In line with the growth strategy of the Councils, this plan seeks to achieve the incremental growth of the town by adopting an approach of integration and consolidation of the existing urban form. In this way, existing neighbourhoods will be strengthened where there are real opportunities to deliver value for money and maximum benefit from investment in relation to physical and social infrastructure and where there are significant opportunities to integrate urban form through linkages and movement. Therefore, proposals for development that cannot link to the existing public waste water treatment network will not be permitted as they would be contrary to the strategy to develop appropriate treatment for the town and would represent a significant threat to environmental sources including groundwater supplies.

Policy PI8: Waste Management

The Councils are committed to reducing waste consigned to landfill sites by promoting waste minimisation and recycling and supporting the ongoing work of Letterkenny Tidy Towns Committee together with the implementation of the Waste Management Plan 2006-2010.

The Councils Waste Management Plan 2006-2010 has been prepared in compliance with the Waste Management Act, 1996. The plan sets out the Councils policies and strategies for the management of waste. Key actions include the reduction of waste to landfill, the development of civic amenity sites/recycling centres, one of which is located in Letterkenny, to advance the development of a materials recovery facility near Letterkenny to handle mixed dry recyclables and a central composting unit for biodegradables, to develop four waste water sludge treatment centres in the County, including one at Letterkenny.

Policy PI9: Renewable Energy

The Councils will encourage alternative and renewable energy sources in an effort to achieve Ireland's obligations under the Kyoto Treaty, which aims to limit greenhouse gas emissions to 13% above 1990 levels in the period 2008-2012.

The environmental and economic benefits of supporting projects to harness renewable energy are significant and have the potential to provide for flagship environmental projects in the Gateway. The Councils support for such energy proposals are driven by the need to deliver sustainability within the Gateway, the need to reduce the threat to the environment and the local economic benefits in terms of construction, operation, servicing and in providing local employment generation. In

addition, the development of renewable energy sources will contribute to the resilience of the Gateway to energy price fluctuations.

Policy PI10: Accidents Directive

Proposals for new developments or modifications of existing uses to those listed in Table 1 Schedule 8 of the Planning & Development Regulations 2001, shall not be located within the stated distances from the specified establishments set out in Table 2 of the said regulations.

Some existing industrial related uses throughout the Plan area involve the storage of flammable, toxic and/or chemical substances. In accordance with the requirements of the Major Accidents Directive (set out in Part 11 Planning & Development Regulations 2001), the Council will seek to prevent a major accident by ensuring the location of new developments, that in the Council's opinion would be relevant to the risk or consequences of a major accident, are not located within specified distances set out in the Planning & Development Regulations 2001.

Policy PI11: Surface Water Management

The Councils will promote and will require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the use of SUDS will be required will be at locations within the flood risk area identified on the land use zoning map, excluding the town centre. This policy will be reviewed on completion of a 'Flooding Study' that is being commissioned in partnership between the Councils and the Office of Public Works.

In order to manage the effect of development on the aquatic environment throughout the Plan area in general but particularly within areas considered to be at risk to flooding, the Councils are keen to encourage the use of Sustainable Urban Drainage Systems (SUDS) for dealing with surface water run-off.

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LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 2

Containing: - Childcare Strategy
Retail Strategy
Housing Strategy
Development Guidelines & Technical Standards

OCTOBER 2009



Note: -

This Volume contains (in this order): -

- 1. Childcare Strategy**
- 2. Retail Strategy**
- 3. Housing Strategy**
- 4. Development Guidelines and Technical Standards**

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VOLUME 2

CHILDCARE STRATEGY

OCTOBER 2009

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1.0 Background and Introduction

1.1 Childcare - Government Policy and Initiatives

The Planning and Development Act, 2000-2006 (Section 10 (2) (l)) makes it a mandatory requirement on Planning Authorities to include objectives pertaining to the provision or facilitation of crèches and other childcare facilities in their development plans.

The Department of the Environment & Local Government issued Ministerial guidelines entitled 'Guidelines for Planning Authorities on Childcare Facilities' in June 2001, under Section 28 of the Planning and Development Acts 2000. **These Guidelines relate solely to the land use planning aspects of childcare provision** and set out policies and objectives that should be considered for inclusion in development plans.

The Department of Health and Children through the Minister for Children holds responsibility for the formulation of childcare policy. The department's brief includes the National Childcare Investment Programme (NCIP) 2006-2010 (previously the Equal Opportunities Childcare Programme 2000-2006), which is a sub-programme of the National Development Plan 2007-2013.

The National Childcare Investment Programme 2006-2010 aims to develop and support childcare provision and services at a local level (as a successor to the EOCP 2000-2006) providing capital funding and the Community Childcare Subvention Scheme in place of staffing grants in order to facilitate parents to participate in employment, training and education through the provision of quality childcare supports. The National Development Plan 2007-2013 has invested €1.3 billion under the NCIP over the six year period of the National Development Plan.

The NCIP heralds a changing focus in the government's childcare policy, enveloping the National Childcare Strategy 2000, the National Anti Poverty Strategy and recommendations laid down in the Barcelona Summit 2002. The NCIP targets the creation of an additional 50,000 childcare places nationally with the creation of an additional, associated 9,200 jobs. Nationally the European Union set targets at the Barcelona Summit, which require Member States to put in place specific ratios of childcare places by the end of 2010 (one place in three (33.3%) by 2010, and early education places must be provided for nine in 10 (90%) of children between 3yrs and 6yrs).¹

Donegal County Childcare Committee (DCCC) was established in 2001 under the National Development Plan's Equal Opportunities Childcare Programme 2000-2006. It is the Committee's role to oversee the development and provision of adequate and appropriate childcare services throughout the County. It is also their role to administer and endorse grants to community and private childcare services under the new National Childcare Investment Programme 2006-2010 (sub-programme of the NDP 2006-2013). In June 2007 the Donegal County Childcare Committee published 'Na Páistí Uilig', a four-year strategic plan specifically focussed on improving the quality and quantity of childcare facilities, programmes and the availability of educational opportunities within Donegal. The Councils shall work in tandem with Donegal County Childcare Committee to facilitate the provision of the best possible childcare facilities within the plan area.

¹ The Higher Education Authority European Report: Education/Labour Market Policy. February 2003

The Department of Health and Children, through the Minister for Children have also published 'We Like This Place - Guidelines for Best Practice in the Design of Childcare Facilities'² (2005). This document further supplements the 'Guidelines for Planning Authorities on Childcare Facilities'. From the Foreword of this document, 'These guidelines offer practical information and guidance on best practice in the planning, design and adaptation of childcare facilities. They are intended for use by childcare providers, architects, building contractors and all who are interested in the quality care of children and best practice in the design of childcare facilities.' This document along with aiding in the overall development issues also highlights key funding for childcare facilities including grants from the NCIP, the Community Childcare Subvention Scheme and Tax Relief available to developers of childcare facilities.

The need to create a Childcare Strategy aims to draw upon all relevant policies and initiatives in order to facilitate the future development of childcare facilities within a National and International Context having regard to the proper planning and sustainable development of Letterkenny and its strategic role as a gateway within the National Spatial Strategy 2002-2020.

This Childcare Strategy promotes the adequate provision of qualitative childcare throughout the Letterkenny and Environs Development Plan area, via objectives and policies as set out in sections 4.0 and 5.0 of this document. Letterkenny Town Council and Donegal County Council will facilitate and promote the development of childcare facilities; it shall not physically provide these facilities.

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² <http://www.dohc.ie/publications/welikethisplace.html>

1.2. Interpretation

1.2.1 Childcare

The definition of childcare, outlined by the Department of Justice, Equality and Law Reform is that: -

“Childcare” refers to day care facilities and services for pre-school children and school going children out of school hours. It includes services offering care, education and socialisation opportunities for children to the benefit of children, parents, employers and the wider community. Thus services such as naíonraí, day care services, crèches, play groups, childminding and after-school groups are included, but schools (primary, secondary and special) and residential centres for children are excluded.

1.2.2 Childminding

The Guidelines for Local Authorities do not cover ‘child minding’, defined as the provision of childcare for no more than 5 children³ (including the child minders own children) in the child minders own home, as they relate solely to the land use planning aspects of childcare provision. However as childminders play an important role in the childcare provision in a local area, they should be considered in the context of ‘need’ for future childcare developments.

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³ Child Care (Pre-School Services) Regulations 2006

2.0 Analysis

2.1 Existing Childcare Facilities

Donegal County Childcare Committee Limited collates the list of childcare facilities across County Donegal, including the Letterkenny Town Council area. According to data supplied by Donegal County Childcare Committee and follow-up work carried out by the Central Planning Unit, it has been ascertained that there are twenty childcare facilities with a total capacity of 567 childcare places.

Although the capacity only allows for 567 places, the actual number of children within the childcare system is 639 children. This is as a result of the sessional nature of some childcare facilities and the part-time participation of some children within the system.

There are also a total of three Parent & Toddler facilities in Letterkenny (see Appendix 1, Table 5). These facilities provide an invaluable service to many parent/guardians; they serve to enable both the parent/guardian and child to have access to a social environment. They differ from other childcare facilities in that they are aimed at having both parent & toddler present at once.

Within the broader Letterkenny Electoral Area, there is a substantial capacity within existing childcare facilities. Table 6 contained in Appendix 1, indicates the capacities of five additional childcare facilities, which exist in the Letterkenny Electoral Area. These facilities combined can cater for a total capacity of 241 children at any one time and have 330 children registered between them. Although these facilities are not within the area covered by the Letterkenny & Environs Development Plan 2003-2009, it is highly probable that they service the occupants of the plan to some degree.

Childminding is not included in the National Childcare Guidelines, but childminders play an important role in the provision of childcare within the plan area. Although it is not possible to quantify the actual numbers of childminders within the Plan boundary and the populations that they cater for, Na Páistí Uilig (DCCC, 2007) highlights that there were 42 childminders known to them within the Letterkenny Electoral Area, catering for 121 children.

2.2 Demography/Population

As detailed in Chapter 1.2 Population & socio-economic context, the 'Background Population Paper', February 2008, highlights the key demographic breakdowns and projections for the geographic area covered by the forthcoming Letterkenny and Environs Development Plan 2009-2015 and beyond towards the year 2020. Within this paper, the breakdowns of the projected populations for Letterkenny are provided and a detailed explanation of the methodology applied is also illustrated. The 'Background Population Paper' calculates a population based on a household size of 2.92 persons per dwelling and the number of dwellings within the Plan boundary. Table 9 in the 'Background Population Paper', indicates that the 2006 population for the Letterkenny and Environs Development Plan area was 19,021 persons.

Table 9 also sets out estimated projected populations for each 4 year period up to 2020, allowing for continued growth of 21.6% each period (as experienced in the period between 2002-2006) in order to attain a target population of 38,573 by 2020. Based on the estimated projected populations provided, the age cohorts relative to childcare have been broken down into the following categories and requirements: -

- 0-2** predominantly child minding, parent and toddler facilities, crèche facilities, sessional and drop in facilities.
- 3-5** predominantly crèche, preschool, playgroup, Montessori, sessional and drop-in facilities.
- 6-12** predominantly Primary school, After-School, Child minding and drop in facilities.

In order to project the populations and the need for facilities within the Letterkenny and Environs Development Plan, the aforementioned age cohort's percentages in terms of the total population in 2006 were calculated using the 2006 CSO census data. This enabled the Central Planning Unit to calculate the derived percentages as shown in Appendix 1, Table 7, which was then applied to the projected populations highlighted in Appendix 1, Table 8 in order to ascertain the future populations of the age cohorts within the area under the remit of the Letterkenny and Environs Development Plan.

Year	Age 0-2 Population Growth	Periodical Increase	Cumulative Increases
2008	1,137	0	0
2010	1,248	111	111
2012	1,383	135	246
2014	1,517	135	380
2015	1,599	82	462
Plan Total	1,599		462

Table 1: Projected 0-2 Population and Incremental Increase required for the LEDP 2009-2015 - 5.3% of Total population

Year	Age 3-5 Population Growth	Periodical Increase	Cumulative Increases
2008	1,094	0	0
2010	1,201	107	107
2012	1,330	129	236
2014	1,460	130	366
2015	1,539	79	445
Plan Total	1,539		445

Table 2: Projected 3-5 Population and Incremental Increase required for the LEDP 2009-2015 - 5.1% of Total population

Year	Age 6-12 Population Growth	Periodical Increase	Cumulative Increases
2008	2,360	0	0
2010	2,590	230	230
2012	2,870	280	510
2014	3,149	279	789
2015	3,319	170	959
Plan Total	3,319		959

Table 3: Projected 6-12 Population and Incremental Increase required for the LEDP 2009-2015 - 11% of Total population

Over the lifetime of the plan, Letterkenny is facing a substantial growth in the need for childcare facilities. Tables 1, 2 and 3 above highlight the increase in each significant childcare age group if the population of Letterkenny reaches the projected total of 30,176 by 2015. The total childcare population will be 6457 within the Letterkenny Plan boundary by the year 2015. At the beginning of the life of this Plan, the 2008 statistics show that there are currently 4,591 children in the childcare age bracket in Letterkenny; this represents an increase of 1866 children between the ages 0-12 in the lifetime of the Plan.

2.3 Need for Childcare Facilities

Reflective of the government policies, the need for childcare continues to increase, not just to assist parents to avail of work, training and educational opportunities but to provide early learning opportunities for children. The Donegal County Childcare Committee works with groups to determine need for facilities and to assist groups in ways to gather information on need (e.g. surveys, open meetings for parents).

Having consulted with the Donegal County Childcare Committee the Councils recognise that there is a particular lack of community childcare facilities within the LEDP area. When considering the provision of childcare facilities, it is necessary to examine the needs of the entire plan population. Within the plan area, there is a multitude of private childcare facilities, however in the interest of promoting social inclusion, the encouragement and facilitation of community based childcare facilities is paramount as these facilities improve access to childcare, particularly for persons who are disadvantaged. This is due to the not for profit nature of many community facilities and the large amount of voluntary labour provided, they are able to offer a more flexible and cost effective service. The boards of community childcare facilities are usually occupied by the parents of the children in attendance, this means that there is a direct link in terms of knowledge of the requirement, need and demand for services in the particular neighbourhood.

Under the National Childcare Investment Programme, the Community Childcare Subvention Scheme (CCSS) (2008-2010) was introduced. This scheme replaced the EOCP staffing grant scheme. The CCSS has a strong focus on disadvantage and is available to a limited group of parents including those: -

- In receipt of social welfare, or
- Engaged in education, training or work experience programmes, or
- Parents in receipt of FIS, or
- Parents in receipt of a medical card.

This scheme is designed to make childcare facilities more affordable, for those with the most need. At present due to the high degree of private childcare facilities, this subvention scheme does not adequately alleviate the pressure from those families with the greatest need in Letterkenny.

Childminding is still the preferred option for many children in Ireland and in some instances this is provided without charge by family or friends.⁴ In the general area of childcare the role of childminding is likely to remain a key sector and although not part of this strategy the high percentage share of children being cared for by childminders is a factor in estimating need for other childcare facilities. Whilst small scale childminders are specifically excluded from the notification process required

⁴ Development Childcare in Ireland: A Review of the progress to the end of 2003 on the implementation of the Equal Opportunities Childcare Programme 2000-2006.

under the Childcare Act 1991, the Childcare Regulations 2006 make provision for the voluntary notification by childminders of their childcare service to their Health Board.

The Councils must look to the National targets set at the EU Barcelona Summit to achieve childcare places for 1 in 3 (33.3%) of the child population by 2010, and early education places for 9 out of 10 (90%) of children between 3 and school going age (approximately 5 yrs of age). Therefore it must be an objective of this Childcare Strategy to facilitate and plan for the provision of physical structures necessary to accommodate these places in line with these set targets. In doing this the implementation of all government policies and initiatives will be vital in shaping policies within the LEDP boundary.

2.4 Breakdown of Need for Childcare Facilities

With the announcement of the National Childcare Investment Programme 2006 - 2010, it continues to be government policy to increase the quantity and improve the quality of childcare facilities. This new programme and the completion of the Equal Opportunities Childcare Programme 2000 - 2006 under the Office for the Minister for Children (Department of Health & Children) is working towards increasing childcare spaces nationally and is supported by POBAL and locally by the Donegal County Childcare Committee Ltd. As detailed in section 1.1 of this strategy, the EU targets set at the Barcelona Summit require childcare for 1 in 3 (33.33%) children between the ages of 0-2 by 2010 and 9 in 10 (90%) between age of 3 and school going age i.e. five years old.

Within the Letterkenny and Environs Development Plan area the current estimated total number of children aged 0-12 is 4,591 or 21.3% of the total population as highlighted in Appendix 1, Table 7. The following sections show a breakdown of how the Barcelona targets will affect childcare provision in Letterkenny over the lifetime of the Plan.

- **0-2 Age Group**

According to data collected by the Planning Office and illustrated in Appendix 1, Table 4, there is currently a capacity to cater for 125 children in the 0-2 age group, which will be required to grow to 416 spaces (33% of 1248), to cater for the 0-2 age group by 2010. The current percentage of children aged 0-2, set against places capable of catering for this age group is only 11.1% well below the targeted 33% set out within the Barcelona Protocol. We must also note that this does not account for any children who may be in the care of a childminder; this is likely to bring the figure closer to 33%. If we apply the one in three requirement to the projected 2015 population figure, then the plan area would require facilities to cater for approximately 530 children aged 0-2, requiring 405 extra childcare places to be provided over the lifetime of the plan.

- **3-5 Age Group**

In the Plan area, there are currently 370 available childcare places for children aged 3-5, which occur in the form of Montessori, Preschools and Playschools. When we analyse this in conjunction with the Barcelona Summit 2002 target of having 90% of children within this age group catered for by 2010, then we can see that only 33.8% of children in this age group are actually catered for. When we project this data towards 2010, the Plan area will require 1080 spaces approx. This represents an increased requirement in provision of 710 extra spaces within childcare facilities in Letterkenny. As with the 0-2 age category, it is impossible to tell from the available

data what percentage are benefitting from the availability of childminding services, however it is extremely likely that a significant percentage of this age group avail of this type of service. Again projecting the available statistics towards the end of the plan there would be a requirement to ensure that facilities exist to cater for an approximate total of 1400 children within this age group.

- **6-12 Age group**

Within this age group there are no EU protocols or national standards to take account of, however this does not mean that facilities to cater for this age group are not required. It is prudent planning to support the development of facilities to cater for the specific requirements of this age group. These requirements are likely to overlap with some of the younger age groups, but also have their own dynamic in terms of the requirement for afterschool facilities and breakfast clubs in particular. The provision of childcare facilities for this age group is paramount in enabling parents/guardians of children to maintain their position in the workplace. To a certain extent the childminding/housekeeping industry will cater for a proportion of the afterschool market. Table 3 above highlights that there will be an increase of 959 children in this age group during the life of the plan. If we observe the current provision of afterschool facilities in Table 4, appendix 1, we can see that there are only 145 afterschool places available. The afterschool sector should be integrated with sessional facilities in order to cater for this dramatic increase in numbers. The Councils will endeavour to take account of the needs of this age bracket and strive to facilitate the provision of both purpose built facilities and encourage the multiple use of existing appropriate facilities with particular emphasis on the multiple use of existing facilities including education site, community facilities and neighbourhood nodes.

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3.0 Goals

The goals of this Childcare Strategy are as follows: -

1. To provide a Land Use Planning Policy framework that will facilitate, encourage and increase the provision of the best possible childcare facilities in a safe and friendly environment to primarily meet the development needs of children, but also the social and economic requirements of the wider population and to ensure the improvement of the quality of childcare services for the community.
2. To provide a Land Use Planning Policy that strategically considers the need for childcare and amenities for children, especially with job creation initiatives, economic-based developments and residential/housing developments in the Letterkenny and Environs Development Plan area.
3. To acknowledge and enhance the role of Letterkenny in the NSS as a Linked Gateway town and its role as a key node and catalyst for the strategic development and growth of the northwest area, through the development of a strong supportive social infrastructure, especially concerned with provision of childcare facilities.
4. To improve the accessibility of childcare provision, through the consolidation of community based services in conjunction with the Neighbourhood Strategy. The Councils will have special regard to the provision of childcare facilities in sites shared or adjacent to educational facilities and will also place an emphasis on the location of childcare facilities which should be at the most accessible point in any new development.

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4.0 Objectives

The objectives of this Childcare Strategy are as follows: -

1. To enable the provision of quality sustainable and adaptable childcare facilities in a variety of locations within reasonable proximity of the population to be served and taking account of the spatial distribution of the population within the Letterkenny and Environs Plan area.
2. To identify appropriate locations for the provision of childcare facilities.
3. To promote equality and address disadvantage/social exclusion in the provision of childcare facilities.
4. To promote and support the provision of both community and private operated childcare facilities.
5. To aim to meet the national standards set out for the provision of childcare facilities by 2010.
6. To promote consideration of alternative/shared transport, sharing or re-use of existing facilities and mobile facilities to meet the needs of remote areas.
7. To consult and work with Donegal County Childcare Committee, local development partnerships/groups, Health Service Executive and the County Development Board in the provision and monitoring of childcare facilities and in establishing baseline information systems.
8. To support the provision of childcare facilities through the Irish language.
9. To recognise childcare as an area of local employment creation and of importance to the social and economic progress of an area.
10. To consider establishing a Childcare Development Fund as part of the review of the Development Contributions Scheme.

5.0 Policies

The policies of this Childcare Strategy are as follows:

1. The Councils will consider all applications for Childcare Facilities and in particular will support the proposal of Childcare facilities within the Community Facilities and Neighbourhood Node zonings. In certain instances the Councils may permit the development of childcare facilities in other areas, where the proposer can illustrate that there is a demonstrated need for the facility. The Councils will require all childcare proposers to conduct a survey of the childcare facilities currently available within the neighbourhood (see neighbourhood strategy map) that the development is proposed. This survey will take account of the capacity per age cohort and type of facilities currently on offer to the residents of the area, including: crèche facilities (both sessional and full-time), nursery, drop-in facilities, playschools, pre-schools, Montessori facilities, Naíonraí and afterschool facilities. On receipt of this data, the Councils will correlate this with the population projections for the area and deem whether or not a childcare facility is required within the immediate area.
2. It is the policy of the Councils to facilitate the creation of sustainable working childcare facilities which will best benefit the plan occupants, this will usually mean that the Councils will prefer that childcare developments are of a suitably large scale as to cater for a variety of childcare needs within the one facility.
3. It is the policy of the Councils that all childcare facilities, existing or proposed should meet the design and technical standards as set out in section 6.0 of this Childcare Strategy and should also employ the design standards set out in 'We like this Place', (DOHC, 2005).
4. Location of childcare facilities:
 - a). The Councils will promote and support, where the need is identified, the provision of childcare facilities in accordance with the development standards as set out in Policy 3. of this strategy.
 - b). Childcare facilities shall also be considered in the use/refurbishment of derelict/run-down/dilapidated buildings or new buildings/extensions to existing buildings/building clusters where the development can be integrated satisfactorily in the landscape and can satisfy Policy 3.
 - c). In all areas, the provision of facilities within, adjacent to or in close proximity to schools, health centres and other community facilities will be preferred in order to facilitate localised provision, accessibility and sustainable development.
 - d). In newer residential areas, district or neighbourhood centres may be identified and the location of childcare and other community facilities will be promoted in these areas. If a district or neighbourhood centre is unavailable to facilitate a childcare development in a new residential area, then any childcare development located within a Residential development should be at the most accessible point within the development boundary.
 - e). All provisions of this Childcare Strategy shall also apply to housing proposals for social and affordable housing.
5. New Housing Development and Childcare facilities:
 - a). Each application for multiple housing developments shall consider provision of childcare facilities as follows: -
 - Where the application is for 75 units or more, a purpose built childcare facility that is equipped with appropriate fittings and fixtures and satisfying

Policy 3., providing for a minimum of 20 childcare places per 75 units shall be provided. If the developments are of a phased nature, then the Councils will consider the childcare facilities in the context of the entire development.

- Where the application is for less than 75 houses, childcare provision shall be considered on aggregate. The onus shall be on the applicant in conjunction with Policy 1 to indicate how the proposed development shall be served by an appropriate childcare facility, either by an existing childcare facility or via provision of a new facility, e.g. in an area that has three 25 house developments, the developer would be liable to build and/or support the development of a childcare facility.
 - b). In conjunction with policy 5a), the Councils will consider the provision of childcare facilities on alternative sites available to the developer which are zoned for Community Facilities or Neighbourhood Nodes in lieu of building the facility within the proposed development. If a developer has access to a site of this nature and seeks to propose a childcare facility thereon, then a concurrent application should be submitted and approved in conjunction with the proposed residential development. If the childcare facility receives at minimum conditional permission to develop, then the developer will not be required to provide an on site facility. The permitted childcare facility should be constructed in conjunction with the residential and completed prior to the occupation of the first dwelling within the development.
 - c). The Councils in conjunction with Policy 4. will support the cooperation of multiple developers in building a joint facility to cater for new and existing residential developments. Any joint submissions should have consideration of the neighbourhood strategy with regard to policy 1a).
 - d). All community/private potential providers and developers wishing to open childcare facilities shall liaise directly with the Donegal County Childcare Committee to match potential childcare need (i.e. community groups, individuals) with potential childcare space (i.e. a facility provided by a developer).
 - e). The requirement to provide childcare facilities as detailed in Policy 5a) above shall be assessed having regard to the make up of the proposed residential area, i.e. an estimate of the mix of community the housing area seeks to accommodate and the result of any recognized childcare needs analysis. As a result of this assessment and collaboration with Donegal County Childcare Committee, the Councils will consider whether specific childcare facilities are required as part of that development. Developers may be required to make another more appropriately located site available. The Councils will also consider short-term arrangements (max. 18 months) within existing housing areas where longer-term facilities have not yet been provided, on the basis that a suitable purpose built facility is either proposed or the operator of the facility has an agreement in place to occupy a suitable building within one year of taking up short term accommodation.
6. Support for community sponsored childcare facilities: -
Letterkenny Town Council and Donegal County Council will continue to support community initiated childcare facilities in partnership with Donegal County Childcare Committee. The Councils recognise the need to support Community developments as a means of achieving affordable childcare within the Plan area. Proposers of community childcare facilities are encouraged to liaise with DCCC in order to provide the best possible facilities for the greater plan area.
7. The Capacity of Childcare Facilities: -
The Councils will consider permission for childcare facilities, which will have capacity for up to 100 children; However the Councils will not look favourably

upon childcare developments that exceed 100 childcare spaces. This is to prevent the clustering of childcare facilities into any particular area and to continue to promote the strategic development of childcare facilities.

8. The Councils will support the handover of childcare facilities from developer to childcare operator.
9. The Councils will not look favourably upon applications, which seek a change of use of an entire childcare facility, which would leave the neighbourhood in question with inadequate facilities to cater for the occupants. In order to achieve a partial or full change of use from a childcare facility to any other use, the developer must conduct a survey of existing childcare facilities as set out in Policy 1 so as to identify that need is adequately cater for.
10. The Councils will establish appropriate development contributions within the context of the next review of the Development Contribution Scheme, with a view to providing for the planned and strategic delivery of integrated childcare facilities.

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6.0 Development Management Standards, Advice and Guidance

6.1 Donegal County Council will work with Donegal County Childcare Committee to develop a detailed development management guidance/PPG note (Planning Policy Guidance Note) on 'Childcare Facilities and Planning Permission.' This would assist those considering the development of childcare provision.

6.2 The following criteria will be applied in the assessment of the suitability of childcare facilities:

- Have regard to the Child Care (pre-school Services) Regulations, 2006, in relation to the planning implications of these regulations.
- Suitability of the site for the type and size of facility proposed.
- Appropriateness of the scale of the operation relative to the area within which it is proposed.
- Potential noise and nuisance generated by traffic or by outdoor play.
- Availability of outdoor play areas and details of management of same.
- Safe access and convenient parking for customers and staff. (The standards to be applied will be considered on the merits of each case. Provision for vehicles to enter and leave a facility in forward gear and/or a lay-by facility along the frontage of developments will be required in most cases).
- Local traffic conditions.
- Number of such facilities in the area and the effect of a proliferation of such uses on the overall character of an area.
- Intended hours of operation (in certain areas, 24 hour operations could be problematic).
- Visual Impact: The effect on the visual amenity and character of an area.
- Demonstrated need for the childcare provision in the area (e.g. through a survey, detailed business plan), regard/ awareness of other local childcare facilities.
- Training in the Early Years/Childcare – this is for the applicant to demonstrate a knowledge of the sector and the issues emerging in the sector, including those that impact quality.
- Consultation with the Pre-school Inspection team to ensure the plans meet the Pre-School Services Regulations 2006 (if applicable).
- Contact with the Donegal County Childcare Committee to ensure the proper steps to starting a childcare service are taken.
- Have appropriate disabled access in accordance with the Disability Act 2005.

6.3 Childminding

Development consisting of a house for childminding would be exempted development subject to Article 10(5) Planning and Development Regulations 2000-2006. 'Childminding' is defined as '...the activity of minding no more than 6 children, including the children, if any, of the person minding, in the house of that person, for profit or gain.'

6.4 Specific Locations

The following paragraphs set out guidance in relation to appropriate childcare provision within specific locations.

In **primarily residential** areas the provision of childcare facilities can prove convenient for users but this must be balanced against retaining the essential residential character.

In **established residential areas** detached houses/sites or substantial semi-detached properties with space for off-street car parking and/or suitable drop-off and collection points for customers and also space for an outdoor play area are likely to be more acceptable for the provision of child care facilities. This is especially the case if this involves use of only part of the house and the residential use remains.

The use of terraced properties or semi-detached properties on small plots is less likely to be acceptable for full day care facilities and will be assessed on their merits with regard to the development management principals outlined above. Sessional or after-school care, which is ancillary to the main residential use, may be more appropriate in this regard.

In **new housing areas** developers will be expected to plan for and include provision for childcare facilities. The level of this will depend on the particular circumstances but as a guide one childcare facility for a minimum of 20 childcare places per approximately 75 dwellings may be appropriate. All new residential developments when providing childcare facilities should have regard to Policy 1 (d), location within newer residential development.

Neighbourhood centres within residential areas would normally be suitable for childcare facilities provided there is adequate open space either contained within the facility or a safe outdoor play area nearby that is easily accessible. In the latter case, if the play area is not in the applicant's control, details of the owner's approval for use will be required. Applicants will also need to provide access and parking which may be in the form of shared parking/drop-off points with other users and must demonstrate that this right exists. Planning permission may be conditional on these matters.

Premises or sites at the edge or interface of residential and other areas **adjacent to primary traffic routes** may be acceptable for the provision of childcare facilities where there is safe pull-in and parking areas for customers and staff.

Childcare facilities may be suitable in **light industrial areas/general employment areas** especially if they are ancillary to an existing industrial use. They are not suitable in general industrial estates/mining areas where the hazards and potential dangers of the process carried on or plant and machinery could be injurious to the health and safety of children.

In industrial areas satisfactory access and parking will be required and the provision of or access to a safe outdoor play area.

In **commercial areas/premises** in the core of the town centre which are heavily trafficked, are unlikely to be suitable for childcare facilities due to the potential creation of a traffic obstruction and hazard. In locations where convenient parking and outdoor play space are available, they will be more acceptable.

Childcare facilities are normally appropriate in **educational establishments** such as colleges and national and secondary level schools, which in particular can provide for after school care.

In all cases, childcare facilities must be located at the appropriate distances from establishments with hazardous substances in accordance with Schedule 8 of the Planning and Development Acts 2000-2006.

6.5 Standards for Full and Part-time Day Care

The following standards will be applied in the consideration of all planning applications for full and part-time day-care facilities:

1. Minimum floor space per child: 2.34m^2 , exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. The Explanatory Guide to Childcare (Pre-school services) Regulations, 2006, recommends as follows:
 - Children aged 0-1 requires 3.70m^2 per child
 - Children aged 1-2 requires 2.80m^2 per child
 - Children aged 2-3 requires 2.35m^2 per child
 - Children aged 3-6 requires 2.3m^2 per child

These recommendations relate to clear floor space per child. Extraneous areas such as kitchens, toilets, sleeping and other ancillary areas are deemed to be separate.

2. Adequate and suitable facilities for a pre-school child to play indoors and outdoors during the day are provided, having regard to the number of pre-school children attending the service, their age and the amount of time they spend in the premises.
3. The care of babies should be confined to the ground floor only.
4. In relation to drop-in and Sessional services, for pre-school children, the Explanatory Guide to Childcare (Pre-school services) Regulations, 2006, recommends as follows: Clear floor space per child, 2m^2 , exclusive of kitchen, bathroom and hall, furniture or permanent fixtures.
5. In relation to drop-in services for children and after school care, the following indicative standard is suggested (but should be considered having regard to all relevant circumstances of the application, including the need for such services in the area and the likely number of hours each child will spend in the facility on and average day): Clear floor space per child, 2m^2 , exclusive of kitchen, bathroom and hall, furniture or permanent fixtures.

6.6 Pre-School Inspection Team

An initial assessment by the Pre-School Inspection Team on the proposed plans/premises is recommended to ensure that the ratios and quality of the environment (e.g. proper ventilation, windows) are met.

6.7 Consultation/Information required for Applications

Consultation/Information required for applications will be as follows: -

It is advisable for an applicant to consult with Planning Section, the Building Control and Fire Officer of Donegal County Council, and the Health Board for the area, prior to submitting an application for a childcare facility. Applicants should also consult with the Donegal County Childcare Committee for support and guidance on the

process and especially on strategically understanding the need for childcare in the area applied.

Donegal County Childcare Committee, in working with prospective childcare facilities, encourage applicants to create a Business Plan, as with any other business, in order to fully understand the viability of the business. Therefore, it is recommended the applicants submit the information as follows:

- a) Nature of the Facility
 - Full day care
 - Sessional
 - Drop In
 - After School Care
- b) Numbers of children being catered for.
- c) Parking provision for both customers and staff.
- d) Proposed houses of operation.
- e) Open space provision and measures for management of same.

The applicant should also be able to demonstrate need (through a survey or by outlining how the facility meets the planning criteria of one facility for 75 new homes).

The applicant, in research before applying for planning permission should outline any other childcare facilities in the locality and should consult the DCCC if they are not aware of any other childcare facilities in the area in which they plan to submit an application. This is to ensure there is a strategic development of childcare throughout the County and to avoid duplication.

The quality of facilities must meet Childcare (Pre-school Services) Regulations, 2006.

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7.0 Childcare Facilities: Definitions

- **Crèche/Nursery/Full day care**

A **full day** childcare service for babies, toddlers and pre-school children (more than 3.5 hours per day). Many crèche and full daycare facilities provide an afterschool service for school-age children (6 to 14 years of age). Drop-in centres may also provide care for babies, toddlers and pre-school children for a full day but on an ad hoc basis (e.g. available in a shopping centre)

- **Sessional Childcare**

A structured service of 3.5 hours or less for pre-school age children (2 years 9 months to five years) to develop a child's transition to school. Sessional childcare includes pre-schools, playgroups and playschools. Pre-school services that use a specific educational philosophy, such as Montessori or High/Scope are also forms of sessional care.

- **Naíonra**

A sessional preschool service provided through the medium of the Irish Language. There are a number of naíonra in Co. Donegal in the Gaeltacht areas and throughout the County.

- **Parent and Toddler Groups**

A support service for both parent and toddler providing an opportunity for children to play and socialise while parents meet. Children attending a parent and toddler session tend to be under three years of age, accompanied by their parent or childminder.

- **School age Childcare/After School Care/Out of School care.**

A childcare service for school-age children (aged 6 to 14), with a children-led structure that may include study, play, social activities, usually the two to three hours immediately following school.

Child minding/Home-based childcare

Individuals that provide childcare in their own home, or in some cases in the children's home. A childminder should look after no more than 5 pre-school children including their own pre-school children. No more than 2 children should be less than 15 months. Many child minders also provide, and are classified as full daycare service.

- **Childcare is also divided into community and private provision.**

Community provision is run by a community group of volunteers (usually parents) on a non-for-profit basis. This can be full daycare, crèche, naíonra, afterschool provision, parent and toddler group. Community childcare tends to be more affordable, although in many areas childcare is one going rate.

- **Private provision**

Private provision is a childcare business that works on a for-profit basis.

8.0 Appendix 1: Tables

	Name	Type/ Service	Capacity	Actual Registered Numbers	Creche, P&T, Sessional & Drop-In, Age 0-2	Montessori, Preschool, Playschool Age 3-5	Afterschool Age 6-12
1	An Naionra Leitir Ceanainn	N	N/A	N/A	N/A	N/A	N/A
2	Child's Play Montessori & Playschool	P	10			10	
3	Donegal Travellers Project Community Creche	FDC	N/A	N/A	N/A	N/A	N/A
4	Doorway Community Playgroup	P	14	35			35
5	Errigal Montessori School & Creche	FDC	87	95	19	52	16
6	First Steps Playgroup	P	15	15	15		
7	Glebe Creche	P	25	25		25	
8	Letterkenny Community Childcare Centre	FDC	73	84	24	40	20
9	Letterkenny Community Development Project Ltd	P	20	31		31	15
10	Letterkenny Shopping Centre Drop-In Creche	D	19	19		19	
11	Little Dreamers Creche, Pre- School and Afterschool	FDC	57	70	20	30	7
12	Magic Roundabout Playgroup	P	20	36		36	
13	Meadow Hill Montessori & Afterschool Sep - June	PA	20	10			10
14	Model Creche, The	FDC	70	82	16	50	16
15	Park School of Early Learning, The	FDC	77	77	21	29	6
16	Rosemount Playschool & Montessori	P	20	20		20	
17	Santa Maria Playgroup (Living Support)	P	N/A	N/A	N/A	N/A	N/A
18	St. Gabriel's Pre-School for Travelling Children	P	N/A	N/A	N/A	N/A	N/A
19	VTOTS Creche	FDC	20	20	10	10	
20	Willowbrook Playgroup & Afterschool	AS	20	20		18	20
Total			567	639	125	370	145

Table 4: The available Childcare Facilities in the remit of the Letterkenny & Environs Development Plan and the associated capacities for the separate cohorts

No.	Name	Type/Service	Capacity	Actual Registered Numbers	Creche, P&T, Sessional & Drop-In, Age 0-2	Montessori, Preschool, Playschool Age 3-5	Afterschool Age 6-12
1	Conwal P&T Group	P&T	35	35	16	19	
2	Letterkenny Baby & Toddler Group	P&T	N/A	N/A	N/A	N/A	N/A
3	Trinity Tots	P&T	23	23	14	9	
Total			58	58	30	28	0

Table 5: The available Parent & Toddler Childcare Facilities in the remit of the Letterkenny & Environs Development Plan and the associated capacities for the separate cohorts

No.	Name	Type/Service	Capacity	Actual Registered Numbers	Creche, P&T, Sessional & Drop-In, Age 0-2	Montessori, Preschool, Playschool Age 3-5	Afterschool Age 6-12
1	Ballaghderg Pre-school - Learning Disability	FDC	15	10		10	
2	Bee Kool Kidz	FDC	32	45	15	16	14
3	Bomany Nursery & Montessori School	FDC	44	54	25	23	6
4	The House of Fun	FDC	65	86	6	50	30
5	Wonder Years Childcare Centre	FDC	85	120	20	80	20
Total			241	330	59	174	68

Table 6: The available Childcare Facilities in the wider Letterkenny Electoral Area, not within the remit of the Letterkenny & Environs Development Plan and the associated capacities for the separate cohorts

	Age 0-2	Age 3-5	Age 6-12	Total
Population - Plan Area	1,001	965.8	2,087.20	4,054
Total Population 2006	19,021	19,021	19,021	19,021
Percentage %	5.3	5.1	11.0	21.3

Table 7: Derived Percentages for Children numbers per age bracket within LEDP as taken from the 'Background Population Paper' (CPU, 2008)

Year	Projected Population Growth	Age 0-2 Population Growth	Age 3-5 Population Growth	Age 6-12 Population Growth	Total Childcare/ Age Group
2006	19,021	1,008	970	2092	4,070
2008	21,454	1,137	1,094	2360	4,591
2010	23,545	1,248	1,201	2590	5,039
2012	26,087	1,383	1,330	2870	5,583
2014	28,630	1,517	1,460	3149	6,127
2015	30,176	1,599	1,539	3319	6,458
2016	31,722	1,681	1,618	3489	6,789
2018	34,814	1,845	1,776	3830	7,450
2020	38,573	2,044	1,967	4243	8,255
Total	38,573	2,044	1,967	4,243	8,255

Table 8: Estimated Child Population per Age Group, Calculated by Applying the Existing Percentage (as Detailed in Table 7 above) to the Estimated Population Projections.

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LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 2

RETAIL STRATEGY

OCTOBER 2009

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1.0 Introduction

The 'Retail Planning Guidelines for Planning Authorities' RPG (Department of the Environment, Heritage & Local Government, 2000) specifically required Local Authorities to prepare retail policies for their administrative areas. In particular the guidelines stated that the following matters should be included in all future Development Plans.

- Confirmation of the retail hierarchy, the role of centres and size of the main town centres.
- Definition of the boundaries of the core shopping area of the town centre.
- A broad assessment of the requirement for additional retail floorspace.
- Strategic guidance on the location and scale of development.
- Preparation of policies and action initiatives to encourage the improvement of town centres.
- Identification of the criteria for the assessment of retail developments.

The guidelines require a broad assessment of requirement for additional development reflecting local evidence of market interest and the need to provide good opportunities for retail provision to serve the main population centres in the County. The guidelines further state that this assessment should enable the formulation of appropriate policies and criteria for dealing with new developments.

In 2006, the Donegal County Council adapted the County Donegal Retail Strategy 2006 - 2012 to complement the policies of the County Development Plan 2006-2012. The County Retail Strategy: -

- Details a retail hierarchy for the County, including the Gateway of Letterkenny.
- Undertakes a broad assessment of additional retail floorspace.
- Provides strategic guidance on the location and scale of development.
- Details Policies and identifies criteria for the assessment of retail development.

This document entitled 'The Retail Strategy' has been prepared on foot of the County Development Retail Strategy continuing Letterkenny's role in the retail hierarchy, and amending policies so as to reflect the strategy for the town centre.

2.0 Review of Retail Policy & Trends

2.1 National Policy

Retail Planning Guidelines (Revised)

The Retail Planning Guidelines (Department of Environment, Heritage and Local Government), came into effect in January 2001 is so far as they relate to retail warehousing:

The 2005 guidelines note that: -

'There is evidence of consumer demand in Ireland for innovative types of large-scale retail warehouses which are capable of displaying a wide range of goods under one roof, together with a range of customer facilities'.

The guidelines identify Letterkenny as a town in the third tier of the National retail hierarchy where the Guidelines indicate that the vibrancy of centres in the third tier is such that they are allowing functions previously only found in higher order centres. The Guidelines also set out the matters that should be included in the strategy.

2.2 Regional Policy Context

Regional Strategy and Regional Planning Guidelines for the Border Region, 2004

The Border Regional Authority published their Regional Planning Guidelines in 2004. The objective of the Regional Planning Guidelines is to provide a long-term strategic planning framework, for the development of the Border Region in the next 20-year period. This planning framework sets the scene for the implementation of the National Spatial Strategy at a regional level.

In terms of retail it is the objective of the Regional Authority to support the retail sector in the Region and address any inter-county or regional dimension of retail both in the context of this Region and other adjoining regions, including Northern Ireland.

It is noted that the key retail locations in the Border Region are subject to cross border competition, where retail centres in Northern Ireland may provide more comparative and cost effective shopping. This is particularly relevant in the case of Letterkenny where the shopping catchments of Letterkenny and Derry are in the Border Region.

2.3 County and Letterkenny Development Plans

• County Development Plan 2006 - 2012

The County Donegal Development Plan 2006-2012 sought to address the following main issue areas:

- The decline of traditional industries and the need for rural diversification and indigenous business development;
- Tackling continual high unemployment rate and the need to compete for employment on a national and international scale;
- Infrastructural deficiencies and linking centres within the County and to regional centres outside the County and within Northern Ireland,
- Improving the weak urban structure and strengthening the role of centres with extensive rural populations,
- Tackling rural depopulation and supporting the Gaeltacht.

• **Spatial Structure**

The Spatial Structure of the County Development Plan 2006-2012 was devised to correspond with the provision of the NSS and the Regional Planning Guidelines for the Border Region. Analysis indicates that the prime area of urban growth in the county has continued to centre on the Letterkenny-Derry catchment in the northeast of the county. The second tier of urban growth is based on the N15 transport axis that runs down the east of the county and includes Bundoran, Ballyshannon, Ballybofey-Stranorlar, and Donegal Town. The rest of the County to the west have much smaller sized peripherally located urban centres serving extensive rural hinterlands.

The Spatial Strategy in the County Donegal Development Plan 2006-2012 tiers the urban centres as follows:

- Promotion of Letterkenny-Derry Linked Gateway.
 - A well developed retail environment (local to regional focus).
 - Co-ordinated development of the town centre expansion.
- Urban Strengthening of Urban Structure at Sub-Gateway Level (Ardara, Ballybofey-Stranorlar, Ballyshannon, Bridgend, Buncrana, Bundoran, Carndonagh, Castlefinn, Convoy, Donegal Town, Dungloe/Bunbeg/Derrybeg, Falcarragh, Glenties, Killybegs, Kilmacrennan, Milford, Newtowncunningham, Ramelton, Raphoe)
 - Provide important retail functions at the sub-gateway level
 - Support the County Retail Strategy
- Urban Support for Towns and Villages Within Close Proximity to the Gateways (Burnfoot, Fahan, Killea, Manorcunningham, Muff)
 - Limited nodal growth at predefined centres, contribute to Gateway critical mass through guiding development within these predefined centres
 - Buncrana, Newtowncunningham and Bridgend as main urban strengthening centres that will include important retail functions for Gateway in general
 - Improve retail functionality of these centres
- Support for Rural Villages and Communities
 - Improving retail functions
- Support for Gaeltacht Areas
- Centres With Special Functions (Lifford, Downings, Rathmullan, Rossnowlagh, Glencolumcille, Gortahork, Greencastle, Merville, Killybegs, Burtonport, Gweedore)

The Retail Strategy contained in the County Donegal Development Plan 2006-2012 identifies the retail hierarchy for the County and this Retail Strategy in respect of Letterkenny is consistent with the County retail hierarchy indicating Letterkenny at the top tier as the Gateway.

• **Letterkenny and Environs Development Plan 2009-2015**

Letterkenny is the principal town of Donegal and is identified in the National Spatial Strategy as a linked Gateway with Derry. The Donegal County Development Plan 2006-2012 responds to the Gateway status by designating Letterkenny-Derry as the primary urban centre within the plan's spatial strategy and views the development of the Gateway as crucial in creating the momentum to drive the development of the entire county.

In common with the rest of the state Letterkenny has enjoyed of period of sustained economic boom in the years prior to and during the period of the Letterkenny and Environs Plan 2003-2009 and is now experiencing the same economic slowdown that is evident at national level. The town has experienced rapid development and

considerable population growth. However, much of this development, both residential and retail, has taken place in a dispersed manner. In addition the town has significant amounts of undeveloped lands zoned and available for both retail and residential development.

This favourable macroeconomic climate has undoubtedly contributed to the expansion and strengthening of Letterkenny's retail offering. During the previous plan period Letterkenny has not only retained but enhanced its position as the primary retail centre within the County. In particular the newly developed area to the east of Pearse Road now boasts a range of branded comparison retailing formats including inter alia: Tempest, Next, TX Maxx, Argus, Atlantic Homecare, Marks and Spencer's, Halfords, Homebase and Dunnes and has significant unused capacity to attract additional stores of a similar format. The growth of the discount food store sector has also been evident with both Lidl and Aldi now operating in the town. In addition the traditional town centre continues to display a strong and diverse independent retailing sector.

- **Retail Development and the Letterkenny and Environs Development Plan 2009-2015**

The Letterkenny and Environs Development Plan identifies a number of significant challenges in the development of Letterkenny as a regionally important retail destination including; improving the attractiveness of the town centre, promoting pedestrian accessibility, and providing new public spaces. The plan also notes other weaknesses in its retail offering including the dispersal of retail activity across the town centre.

Letterkenny Development Plan policy seeks to create a, vibrant accessible, multifunctional and attractive town centre environment. Specifically the plan aims to maintain town centre vitality, improve pedestrian permeability, provide a better mix of uses within the town centre, protect and enhance its built heritage and townscape and create a high quality public realm (Volume I, Part B, Section 7.0 refers).

In order to ensure town centre vitality and viability, the plan utilises the sequential approach to guide the location of retail development. Under this policy the town centre is the preferred location for retail development. Retail Development outside of the town centre will only be permitted where there is no reasonable opportunity within the town centre. Furthermore retail developments will only be permitted outside the identified town centre provided that they: would not detract from the vitality of the town centre, and adhere to range of other planning criteria. The plan does however provide for the development of neighbourhood retail outlets, intended to serve a primarily neighbourhood need, outside of the defined town centre.

The plan also sets out policies which, detail the general criteria for retail development, place restrictions on the scale of ancillary retailing outside of the town centre and restrict the development of certain low density/inappropriate retail uses (e.g. car showroom/lots) within the town centre.

In addition the plan sets out a number of important town centre policies, directly related to retail development, which seek to:

- Guide future expansion of the town centre in accordance with the Urban Design Framework.
- Ensure that new development provide for a mix of town centre uses.
- Achieve a higher design standard in new developments.
- Develop key sections of active street frontage within the town centre.
- Protect the Built Heritage and Historic Streetscape area within the town centre.

- Improve pedestrian permeability.

2.4 Retail Trends

Ireland has for most of the last decade witnessed unprecedented rates of economic growth. This growth has manifested itself in the retail sector through increased floorspace and increased volume rates of growth. The retail sector now contributes 6% of Ireland's Gross Domestic Product (GDP) compared with just under 5% a decade ago. Along with these growths have emerged new forms of retailing not previously present in Ireland's retail market. The main trends are discussed below.

Growth in Retail Sales and Floorspace

Retail floorspace in Ireland grew a staggering 22.4% from 1988-1996. According to the 1988 CSO figures the retail floorspace requirements for convenience and comparison retail was 1,896,636sq m. According to the Retail Planning Guidelines the retail floorspace requirements in 1996 were 2,320,810sq m. These figures show a rise of 424,174sq m (22.4%). Total retail floorspace is estimated to have grown by 35.2% from 1996 to 2003, an annual average rate of 4.4%. According to Forfas and Goodbody Report retail sales grew by 60% during the period 1990-1996 and by a further 42% from 1996-2000.

Structural Changes

The Irish national policy and advisory board for enterprise, trade, science and technology (FORFAS) has identified four key trends in international retailing that are now affecting Ireland:

A trend towards large sized units, particularly in food retailing.

Diversification, particularly by food retailers, into new product areas (e.g. DIY, clothing and household products), new geographic markets, and into new businesses (e.g. Marks and Spencer's move into retail financial services).

Provision of improved services to customers, such as scanning at checkouts, home shopping, and home deliveries and centralised supply chain network.

International Trends

Below are some of the key trends, which are likely to affect retailing in Ireland.

• Entry of US Retailers

Many of the large-scale retailers in the US have now entered the European retail market (e.g. Wal-Mart, Toys 'R' Us), usually via one of the larger retail markets such as France, the UK or Germany. The average size of a US supermarket is 2,600m². Wal-Mart is the US market leader, and in 1999 it entered the UK market when it acquired the ASDA supermarket chain. The company is highly aggressive and often undercuts its rivals. TK Maxx, the clothing discount store, has already expanded into Britain and Ireland.

• Non-Store Retailing

A market that was once seen as relatively mature (e.g. mail order catalogue shopping) is now witnessing substantial change due to the growth in Internet and television shopping. The growth in this market has been marked, but also somewhat fragmented, with many new entrants losing out and a number of traditional retailers finding a foothold. This market is currently seeing intense change, and it is difficult at this state to estimate the growth potential in the market. However, it is likely to be substantial on a long-term basis, particularly for non-bulky comparison items such as books, CDs, and computer software. One area likely to see substantial growth is 'super-specialized' shopping, where the size of overall market allows traders,

particularly new entrants into the market, to specialise in a much narrower range of products than a high street store but with far greater depth. It would, however, require a large volume of these retailers to impact upon traditional town centre and out of town retailing.

- **IT**

Developments in information and communications technologies (ICTs) are enabling improvements in market research and analysis, and supply chain management. This is driving significant change in international retail supply chains as retailers seek out increasing efficiencies and seek to reduce inventories.

- **Growth in Hypermarkets**

There are currently no hypermarkets in Ireland, but the current population and economic conditions suggest that there will undoubtedly be demand for these types of units. However, current floorspace caps are likely to restrict the growth of this type of retailing.

- **Emergence of Category Killers**

The trend to larger sizes in the retail sector, already identified, has been a factor in the European emergence of what is known as 'category killers'. These are usually very large outlets, which offer a specialized product range. Examples include Toys 'R' Us and the Swedish retailer IKEA. They are often 'destination' retailers and their catchment is often much larger than traditional town centre.

- **Diversification**

With the increasing sophistication of consumer demand, recent years have seen a substantial increase in the product ranges that are provided by many larger stores. This includes expansion into alternative areas in addition to the expansion of existing product ranges. It has largely been the result of increasing sophistication of consumer demand. Stores have tried to keep pace with this demand with the emphasis very much on facilitating the consumer and ease of shopping.

- **Irish Retail Trends**

The number of retail outlets in Ireland has increased dramatically since the late 1970's (39,697 in 1977 to 52,764 in 1998). While the number of grocery and clothing outlets has declined this has been more than offset by the increase in the number of other outlets. Mainly specialised outlets, such as DIY, jewellers and hairdressing salons, have driven the growth in outlets. The fall in the number of grocery retailers reflects the low growth in consumer expenditure, coupled with the competition between retailers.

Food retailing within Ireland has experienced concentration. Dunnes Stores has approximately 22% of the market followed by Tesco with approximately 16%. The growth of symbol shops such as SuperValu, Spar, and Centra has also been a feature of the past decade. Independent shops have a 15% market share, which represents almost 87% of the retail outlets.

There has been a decline in the number of clothing outlets in Ireland since the late 1980's (4766 in 1988 to 4259 in 1998). The leading organisations in clothing are Dunes Store and Penney's who between them have 40% of the market.

The major retail trends in Ireland, of relevance to this Study are set out below.

- Further concentration of ownership in the food sector is likely, particularly through the entry of further UK supermarkets. Tesco has already entered the market; other retailers such as Sainsbury, Safeway or US retailer Wal-Mart/Asda may enter the market. The planning limits introduced in 2000 are likely to be a significant deterrent to UK retailers in the food sector, as they prevent them from operating in their preferred formats.
- Independent retailers are likely to have more of a future in Ireland than they have elsewhere in Europe. Many smaller stores have managed to maintain a role in the market as “top up” outlets located close to residential areas selling a variety of items, from bread and milk, newspaper, and with many also including small delicatessens to sell breakfast and lunch foods. Cultural differences, population densities, and deterrents to market entry from UK and other European multiples should ensure a strong future for Irish independents. However, a major problem has been the growth in garage forecourt shopping and the numbers of independent retailers is, however, predicted to continue falling. An alternative for some has been to join the symbol groups (Spar, Centra, Super Valu, Costcutter etc) as a way of maintaining competitiveness.
- Experience elsewhere in Europe suggests that supermarket retailers will attempt to launch new formats to increase market share: top-up shops in town centre or convenience sites; compact stores in edge of town or market town locations; and stand-alone petrol station stores with wider than usual products.
- Discount retailers Aldi and Lidl have been active in the Irish market since the late 1990s. While there was some scepticism initially from industry insiders over the likely success of this retail format, recent figures show that they are maintaining a 5% of the market. Discount foodstores tend to specialise in certain goods such as dry goods, pet food, confectionery, and cleaning products with many customers frequenting these stores specifically to bulk buy these types of products. While originally envisaged as being complementary to larger retail outlets there have been a few recent examples where discount foodstores have been accepted as providing a local retail service as part of a mixed-use development.
- Forecourt retailing is a rapidly developing concept in Ireland, particularly through the link-up between petrol companies and symbol groups (such as Maxoll or Maces). Many Local Authorities have initiated policy in recent years to regulate the size of such outlets which are increasingly seen as a threat to the vitality and viability of town centres.
- There has also been an increase in the popularity of farmers markets selling fresh produce such as fruit and vegetables, meat and dairy products. This trend has been particularly noticeable in Dublin and the larger urban areas. Letterkenny has a Farmer’s Market that operates the 1st and 3rd Saturday of every month.
- Concentration in the clothing sector is expected. Dunnes Stores and Penneys currently dominate this market. Concentration is likely to occur through the entry of UK and other European retailers into the Irish clothing sector. The easiest way for these retailers, such as Next, Monsoon, and Oasis, to gain a foothold is through the opening of new shopping centres, which is the easiest and cheapest way for these retailers to get suitably sized units. This trend is already growing, as international retailers are taking up units in new shopping centres. This division of the two dominant players should enable the existing independent retailers to remain strong, but it is necessary that these new shopping centres do not have advantages (such as accessibility by car) or the traditional town centre shopping would be threatened in Ireland the same way as it has been in the UK.
- Outside of the new shopping centres, this influx of UK retailers is likely to be most marked in the larger Irish towns and cities, where the uniformity of high streets in Britain is expected to spread to these Irish locations.

- The pressures for factory outlet retailing are likely to continue in Ireland, following the huge growth in this sector in the UK, and recent applications and permissions within Ireland. These centres comprise groups of manufacturers who trade from individual units on a common site, selling mainly end of lines or seconds, at significantly reduced prices. These outlet centres are part retail, part tourist attraction, but manufacturers prefer them to be located in out-of-town locations so that they are not competing with stores selling full-price products on the high street. Forfas estimates a capacity for only three or four factory outlets in Ireland, and they are likely to remain a very difficult planning issue.
- Retail warehouse parks saw huge growth in the UK in the 1980s and into the 1990s. More recently, they have started to be developed in Ireland, and demand for these parks is likely to remain high for the foreseeable future. Typically, they are locations for bulky items not easily bought on the high street (DIY, white electrical goods and carpets), but many UK retail parks include clothing retailers.
- Consumer shopping habits and meal preparation habits are changing. This is driving the food retail structure to one of large stores for once-weekly shopping trips and smaller convenience stores for top-up purchases.
- It is very evident that changes have taken place in the ownership of high street shops. The number of small independent retailer has substantially decreased and in its place are the larger retail shopping centres. According to AC Nielsen there were 9,387 independent shops in Ireland in 1988. Ten years later this fell to 7,872. The number of independent retailers is predicted to continue falling. Some may join the symbol groups as way of maintaining competitiveness.

The Emergence of New Forms of Retailing

There are a number of new forms of retailing breaking into the Irish market and include among others, retail warehousing, retail parks, factory outlet centres and e-retailing. The potential implications of each are examined below.

Retail Warehouse and Retail Parks

Retail parks are a single development of at least three retail warehouses grouped around a common car park. Retail warehousing is a form of retailing that specialises in the sale of mainly bulky goods. It operates on the basis of scrambled merchandising, which means that they sell everything from car tyres to baked beans. Stock is sold in bulk and at significantly lower prices than in traditional retail outlets. They are characterised by large display areas with the public usually travelling to them by car and taking away their purchases by said transport.

Due to the scale of this form of retailing, the Retail Planning Guidelines acknowledges that town centre sites are not always the best location for this form of retailing. In practice they are best suited to edge of centre or out of centre locations where ease of access is provided.

According to the Retail Planning Guidelines 'It is beneficial to group retail warehouses on planned retail parks so that the number of trips by car are minimised and outside the town centre so that there is relief for additional traffic within a congested town centre'.

Factory Outlet Centres

These centres comprise groups of manufacturers who trade from individual units on a common site, selling mainly end of lines or seconds, at significantly reduced prices. These outlet centres are part retail, part tourist attraction. The Retail Planning Guidelines state that town centre locations are not the best location for such developments and instead indicate that edge of town centres where public transport systems are provided may be more appropriate. Manufacturers also prefer them to be

located in out-of-town locations so that they are not competition to stores selling full-price products.

Forfas estimates a capacity for only 3-4 factory outlets in Ireland and believe that they are likely to remain a difficult planning issue. International experience suggests that there is a need for a large catchments population in order for such retail centres to be a success.

E-Retailing

This is one of the most recent developments of retailing on the Irish retail market. E-retailing takes place where items are purchased over the Internet without the need to visit a retail outlet. According to the Centre for Retail Studies, UCD, rates of home computer ownership and internet usage are rapidly increasing in Ireland and the centre estimates that 30% of the population have already made at least one purchase on the Internet.

Distribution lies at the heart of the expansion of this sector and the more efficiently this can be achieved, the greater the potential scope. In the food retail sector, because the product is high bulk/low value, efficient distribution has to be linked to relatively high-density population and high market share by participating retailers. The conditions are not in our opinion ideal in Ireland outside the Dublin conurbation and combined with the absence of trading in retailing by 'other' means, the impact may not be nearly as significant as is being predicted in other retail economies. These other means include mail order. Moreover, if relatively low levels emerge, the probability is that the form of retailing will be based on the larger foodstores rather than new distribution warehouses. In that case it will simply contribute towards normal retail expenditure.

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3.0 Review of Demographics & Existing Floorspace

3.1 Existing Floorspace

Table 1 below details the amount of existing retail floorspace in the County as a whole based on the floorspace survey conducted by DTZ Pida Consulting in 2002 and updated to 2005 based on figures gathered from a planning file search of granted retail applications at Donegal County Council, Letterkenny Town Council, Buncrana Town Council and Bundoran Town Council⁵. Furthermore, the additional new draft floorspace permitted within the Letterkenny plan area between 2005 and present is 36,654m² resulting in current existing and permitted retail floorspace of 102,344m².

Floorspace (m ²) in County Donegal, 2005				
Location	Convenience	Comparison	Bulky Goods	Total
Letterkenny	12,279	41,249	12,162	65,690
Donegal Town	4,210	7,619	1,060	12,889
Ballybofey-Stranorlar	1,934	10,324	380	12,638
Buncrana	2,916	7,252	4,024	14,192
Ballyshannon	2,542	3,657		6,199
Dungloe-Bunbeg-Derrybeg	5,795	4,075	1,500	11,370
Bundoran	3,014	4,977		7,991
Carndonagh	1,735	3,130		4,865
Falcarragh	1,164	2,024		3,188
Raphoe	801	1,764		2,565
Ardara	688	1,965		2,653
Moville	1,136	1,246		2,382
Killybegs	1,332	1,202		2,534
Glenties	762	779		1,541
Milford	279	1,331		1,610
Lifford	323	576		899
Ramelton	370	297		667
Castlefinn	280	207		487
Convoy	418	270		688
Other Areas	745	2,010	160	2,915
Total	42,723	95,954	19,286	157,963

Table 1: Floorspace (m²) in County Donegal as existed in 2005

3.2 Population Predictions

Volume 1, Part A, Section 2.0 outlines the analysis of existing and projected population for the plan area. The analysis shows that the population in 2006 (within the plan area) was 19,363 persons and taking continuing trends projects the population at 2020 to be between 36,000-39,000. The population of County Donegal was 137,575 in 2002, increasing to 147,264 in 2006.

⁵ These figures included a small number of approved applications that are not yet built/operational

4.0 Health Check Review

4.1 Letterkenny Town Centre Health Checks

In the course of preparing the Letterkenny and Environs Development Plan 2009-2015, the Planning Authority conducted a comprehensive Town Centre Health Check. This health check included a variety of indicators including: retailer profile, the quantity of retail floorspace, vacancy rates, accessibility, car parking, pedestrian flow and environmental quality. The key findings of this health check vis-à-vis retail development are summarised below:

There has been an overall increase in retail space of 36% in the period 2005-2008 resulting in a total existing and permitted retail space of 102,344m² within the town. This included a considerable increase (63%) in permitted bulky retail space alone.

The main street area remains the retailing, service, entertainment, cultural and social heart of the town and demonstrates a vitality and displays a vibrancy and diversity not evident elsewhere in the town centre. In particular the pedestrian survey found that the highest footfall continues to occur along the main street.

The town possesses a relatively strong comparison-retailing sector occupying 32% of the total number of business premises. In particular Letterkenny now boasts a range of branded high street comparison retailers including inter alia: Tempest, Next, TX Maxx, Argus, Atlantic Homecare, Marks and Spencers, New Look, Halfords, Homebase and Dunnes and has significant unused capacity to attract additional stores of a similar format.

The town boasts a relatively strong independent retail sector with a 3:1 split between independent retailers and national/multinational retailers. However it was noted that this Independent sector was significantly dominated by service activities (38%).

The town centre has a considerable supply of car parking spaces - 7828, of which 4044 are public and 3784 are private. However the health check noted that the majority of this parking was located in the newly developing area East of Pearse Road.

In addition to the above the Planning Authority has noted a number of other significant development trends. In particular it has been noted that the favourable economic climate in combination with a preference by retailers for large format retail units with car parking frontage, has resulted in the majority of multinational 'branded' higher order comparison retailers establishing themselves in large format retail warehouses dispersed throughout the eastern portion of the town centre. The overall design quality and general layout of development in this area is generally poor and the area suffers from limited internal and external pedestrian permeability. In tandem with this trend the town centre struggles to attract and retain higher order retail activities and is increasingly dominated by lower order retailing activities.

Taken in conjunction with the location of existing retail developments within the town this trend has resulted in the creation of a low density, multimodal retail environment of limited character. In turn this situation undoubtedly detracts from Letterkenny's attractiveness as a retail location.

5.0 Available Expenditure (Floorspace Growth Assessment)

5.1 National Retail Expenditure for 2002 (Annual Services Inquiry)

Initially, an estimate for current levels of convenience and comparison retail expenditure in County Donegal is obtained based on estimates derived from the following CSO and ESRI data:

- *2002 Annual Services Inquiry*, published December 2004
- *Retail Sales Index Figures*, published monthly
- *2002 County Incomes and Regional GDP*, published March 2005
- *ESRI Medium Term Review*, published May 2003
- *Quarterly Economic Commentary (Summer 2005)*, published May 2005

National Retail Expenditure, 2002 (Annual Services Inquiry) (€'000)			
Expenditure category	Expenditure excluding VAT (€ '000)	VAT (€ '000)	Total (€ '000)
Convenience in non specialised stores	9,908,127	967,889	10,876,016
Food, beverage, tobacco in specialised shops	1,093,048	62,974	1,156,022
Pharmaceuticals	1,008,409	74,065	1,082,474
Total Convenience	12,009,584	1,104,928	13,114,512
Comparison goods in non-specialised states	521,480	90,529	612,009
Other Retail sale of new goods in specialised stores	7,397,006	1,283,837	8,680,843
Pharmaceuticals	372,973	27,394	400,367
Total Comparison	8,291,459	1,401,760	9,693,219

Table 2: National Retail Expenditure as existed in 2002

Source: CSO

Assumptions:

5% of non-specialised stores are comparison (and with same rate of VAT as Other Retail).

Pharmaceuticals are split 73% convenience and 27% comparison (As in Cork Strategic Retail Study, 2002)

5.2 National Retail Expenditure updated to 2005 (Annual Services Inquiry and Retail Services Inquiry)

Then projected annual growth rates for convenience and comparison retailing are based on the most recent Retail Sales Index results for the 2nd quarter of 2005. The growth rates are applied based on a combination of both price and volume growth rates, so that these years are presented in current prices (As in the 2002 Retail Strategy). 2005 will therefore be the price base year for future projection.

National Retail Expenditure Growth 2002-2005 (Retail Sales Index) (€'000)		
Expenditure category	2002	Q2 2005
Convenience in non specialised stores	10,876,016	14,971,799
Food, beverage, tobacco in specialised shops	1,156,022	1,242,664
Pharmaceuticals	1,082,474	1,483,853
Total Convenience	13,114,512	17,698,316
Comparison goods in non-specialised states	612,009	842,485
Other Retail sale of new goods in specialised stores	8,680,843	10,444,776
Pharmaceuticals	400,367	481,721
Total Comparison	9,693,219	11,768,982

Table 3: National Retail Expenditure Growth between 2002 and 2005 in € '000

Note:

- Projections based on annual percentage growth rates for value and volume sales combined.
- The % growth rates indicated for "Other Retail sale of new goods in specialised stores" is taken as an average of the growth rates indicated in the Specialised Stores (NACE 52) category of the RSI excluding "Pharmaceuticals" and "Food, Beverages and Tobacco".

The CSO Population and Migration Estimates for April 2005 estimates the national population as 4,130,700. This gives estimated national per capita expenditure rates of **€4,285** for convenience and **€2,849** for comparison.

5.3 Non Household Expenditure

Calculations of the non-household (or business to business) expenditure is omitted from this calculation as on the one hand business expenditure is relatively small and also because a reasonably stable relationship between household and business expenditure can be assumed and carried through.

5.4 Differential Between State and County Expenditure Per Head

The *County Incomes and Regional GDP* 2002 data is used to obtain a more accurate figure for expenditure at county level. This data indicates that the disposable income per person in County Donegal (€13,928) is 83.8% of the state average (€16,625). This results in convenience expenditure for Donegal of €3,591 and €2,387 for comparison.

Per Capita Retail Expenditure, County Donegal 2005 (€)		
	National per capita expenditure 2005	Donegal County per capita expenditure 2005 (base year)
Convenience	4,285	3,591
Comparison	2,849	2,387

Table 4: Per Capita Retail Expenditure in Co. Donegal as of 2005

Source: CSO Annual Services Inquiry, 2002 and County Incomes and Regional GDP, 2002

5.5 Expenditure Per Head - Projections to 2015 (ESRI Projections)

Overall consumption rates are then transformed into expected increases in expenditure for convenience and comparison goods. Evidence from mature EU retail economies of the EU indicates that comparison retailing will eventually outgrow convenience to become the main source of retail expenditure. However, convenience expenditure sales have continued to grow steadily contrary to predictions in the early 2000s and are unlikely to experience a major decline in the short term. The 2002 Annual Services Inquiry and subsequent Retail Sales Index figures indicate that convenience expenditure grew by an average of 3.8% annually between 2002 and the first quarter of 2005 while comparison grew by 4.3% over the same period.

The general ESRI growth figures have been used in projecting annual growth rates going forward. The ESRI *Medium Term Review 2003-2010* published in July 2003 projected a cautious rise in personal consumption, from an average of 3.1% per annum in the period 2006-2010, down to 2.5% in the period 2011 to 2016. However, since the recent upturn in the Irish economy the more recent *Quarterly Economic Commentary (Summer 2005)* has forecast growths in consumer expenditure of 5.3% for 2005 and 5.6% for 2006.

The “High Growth” scenario used is based on a substantial increase in personal consumption as indicated in more recent ESRI reports further refined to indicate an increase in the comparison share of overall expenditure while convenience growth begins to decline. The “Low Growth” scenario is more reflective of the ESRI growth projections of the early 2000s and is based on a levelling off of the economy in general towards growth rates similar to the average for mature EU member state economies.

Annual % Growth For Convenience & Comparison Retail Expenditure, County Donegal		
	Convenience	Comparison
2005-2010 High	2.3%	5.5%
2005-2010 Low	1.8%	4.4%
2010-2015 High	1.8%	4.1%
2010-2015 Low	1.3%	3.3%

Table 5: Annual % Growth For Convenience & Comparison Retail Expenditure, Co. Donegal

Summary of Estimates of Expenditure by Residents of County Donegal 2005, 2010 and 2015 (€m 2005 prices)					
	Total Expenditure (€m)		Population	Per Capita Expenditure (€m)	
	Convenience	Comparison		Convenience	Comparison
2005	512.0	340.3	142,587	3,591	2,387
2010 High	608.9	472.0	151,350	4,023	3,119
2010 Low	594.2	448.0		3,926	2,960
2015 High	706.7	612.6	160,652	4,399	3,813
2015 Low	672.6	559.4		4,187	3,482

Table 6: Summary of Estimates of Expenditure by Residents of County Donegal 2005, 2010 and 2015 in millions of Euro (2005 prices)

As with all forecasting, there is an element of uncertainty with these projection figures, particularly with personal consumption growth, which from year to year is heavily influenced by factors such as inflation, and overall economic growth nationally and globally.

5.6 Turnover Estimates

The comparison and convenience retail turnover estimates for the County are then calculated by calculating the total amount spent by the resident population and those living outside the County on retail goods sold within the County and relating this back to turnover.

The DTZ PIEDA Consulting Household Survey conducted as part of the 2002 Retail Strategy indicated that 5.5% of convenience expenditure and 18% of comparison expenditure by the resident population is spent outside of the County. For 2005 it is assumed that the level of convenience and comparison expenditure leakage will remain constant.

Expenditure by the Resident Population on Retail Goods in County Donegal 2005		
	Convenience	Comparison
Total Expenditure by Resident Population on Retail Goods in and outside the County	€512.0	€340.3m
Proportion of Total Expenditure by residents on Retail Goods outside the County	5.5%	18%
Expenditure by Resident Population on retail Goods in the County (€m)	€483.8m	€260.7m

Table 7: Expenditure by the Resident Population on Retail Goods in County Donegal 2005

Expenditure by the Resident Population on Retail Goods in County Donegal 2005, 2010 and 2015 (€m)		
	Convenience	Comparison
2005	483.8	279.0
2010 High	575.4	387.0
2010 Low	561.5	367.4
2015 High	667.8	502.3
2015 Low	635.6	458.7

Table 8: Expenditure by the Resident Population on Retail Goods in County Donegal 2005, 2010 and 2015 (€m)

The Household Survey also estimated that 7.6% of convenience expenditure and 16.6% of comparison expenditure in the County could be attributed to non-residents. The surveys that indicated this estimate were conducted in January and were considered an underestimation of this type of spend.

Factored in also is an assumed decrease in the level of convenience and comparison expenditure trade draw from across the border due to the depreciation of Sterling against the Euro since late 2002. It is also estimated that foreign and domestic tourism expenditure in Donegal accounts for 0.5% of convenience and 3.5% of comparison retail expenditure in the County annually.

Based on a combination of the above factors, it is assumed that the percentage expenditure attributable to non-residents is 10% for convenience and 20% for comparison.

Combining resident and non-resident expenditure estimates gives total retail expenditure by all persons on goods in retail outlets throughout the County. The assumption is made, therefore, that the total amount of expenditure on goods in retail outlets in Donegal will be approximately equivalent to the level of turnover in these outlets.

Total Turnover (Resident and Non- Resident) in County Donegal 2005 (€M 2005 Prices)				
	Convenience		Comparison	
2005 Expenditure by Resident Population	483.8	90%	279.0	80%
2005 Expenditure by Non-resident Population on retail Goods in the County	48.38	10%	69.75	20%
2005 Total Expenditure/ Turnover on Retail Goods in the County	532.2	100%	348.7	100%
2010 High Expenditure by Resident Population	575.4	90%	387.0	80%
2010 High Expenditure by Non-resident Population on retail Goods in the County	57.54	10%	96.7	20%
2010 High Total Expenditure/Turnover on Retail Goods in the County	632.9	100%	483.7	100%
2010 Low Expenditure by Resident Population	561.5	90%	367.4	80%
2010 Low Expenditure by Non-resident Population on retail Goods in the County	56.1	10%	91.9	20%
2010 Low Total Expenditure/Turnover on Retail Goods in the County	617.6	100%	459.2	100%
2015 High Expenditure by Resident Population	667.8	90%	502.3	80%
2015 High Expenditure by Non-resident Population on retail Goods in the County	66.8	10%	125.6	20%
2015 High Total Expenditure/Turnover on Retail Goods in the County	734.6	100%	628.4	100%
2015 Low Expenditure by Resident Population	635.6	90%	458.7	80%
2015 Low Expenditure by Non-resident Population on retail Goods in the County	63.6	10%	114.7	20%
2015 Low Total Expenditure/Turnover on Retail Goods in the County	699.2	100%	573.4	100%

Table 9: Total Turnover (Resident and Non- Resident) in County Donegal 2005

Summary of Estimates of Expenditure by Non-Residents on Retail Goods in County Donegal 2005, 2010 and 2015 (€m 2005 prices)		
	Convenience	Comparison
2005	48.38	69.7
2010 High	57.54	96.7
2010 Low	56.1	91.9
2015 High	66.8	125.6
2015 Low	63.6	114.7

Table 10: Summary of Estimates of Expenditure by Non-Residents on Retail Goods in County Donegal 2005, 2010 and 2015

5.7 Turnover Ratios (Sales per Square Metre)

Turnover ratios (Sales per M²) are estimated based on turnover of retail outlets and the retail floorspace survey results, which indicated a net convenience floorspace of 42,723 m², 95,954 m² of comparison and 19,286 m² of bulky goods/retail warehousing.

This gives a turnover ratio of **€11,305** for convenience and **€2,421** for comparison, which includes retail-warehousing formats that generally have lower per square metre turnover than other retail formats.

5.8 Gross Additional Expenditure Potential

To project the additional retail expenditure from non-residents, the same high and low scenario as above is applied. These estimates are then added to the additional expenditure calculated for residents over the same period.

Total Available Expenditure from Residents and Non Residents 2005-2015 (€ 2005 prices)								
	Convenience				Comparison			
	2006-2010		2011-2015		2006-2010		2011-2015	
	Low	High	Low	High	Low	High	Low	High
Resident Population	85.4	100.7	81.6	101.7	110.5	135.0	114.2	144.7
Non-Resident Population	7.7	9.2	7.5	9.3	22.2	27.0	22.8	28.9
Additional Expenditure Potential	93.1	109.9	89.1	111.0	132.7	163.0	137.0	173.6

Table 11: Total Available Expenditure from Residents and Non Residents 2005-2015

5.9 Future Sources of Retail Sales

There were a number of extant planning permissions (August 2005) at Further Information or appeal stage, which if granted, would add an additional 3013 m² of convenience retail floorspace and 10,658 m² of comparison. Using our estimated turnover ratios, this additional floorspace, if granted will capture approximately €33.1m of convenience expenditure and €25.8m of comparison expenditure.

5.10 Turnover Efficiency Growth

As in the 2002 Retail Strategy turnover efficiency growth rates are not factored into the convenience calculations as it is felt that the main retail multiples, which account for the majority of the convenience retail space in the County are already operating at high efficiency rates.

However it is felt that comparison efficiency growth is relevant particularly since the large chain multiples such as TK Maxx and Next have entered the Donegal market in recent years. Research suggests that turnover efficiency in comparison retailing is about 1% per annum.

Going on the basis that the 2005 comparison turnover total is €317.0m this would give an additional €16.2m between 2006 and 2010 and €17.0m between 2011 and 2015 as a result of efficiency growth in turnover.

Turnover efficiency growth is also factored in the new comparison outlets were current extant permission. On the basis that these would be fully operational by 2008, it is estimated that the turnover efficiency from these stores will result in an additional €1.32m up to 2010 and €1.38m between 2011 and 2015.

5.11 Other Retail Sales

It is contended that there has been minimal growth in other forms of retailing such as mail ordering, market stalls and Internet retailing. While it is noted that Tesco has introduced a successful Internet retailing service in recent years any expected growth in convenience will be coming from already established stores and will contribute towards normal retail expenditure in these stores.

The market for comparison retailing over the Internet is strong particularly considering the peripherality of many areas of Donegal from large comparison retail centres both within and outside the County.

It is assumed that growth rates for Internet comparison retailing based on the 2002 Retail Strategy: 4% of total comparison expenditure up to 2010 and 6% between 2011 and 2015. There are four Country Markets operating in the County at Buncrana, Carndonagh, Dunfanaghy, and Ramelton. It is assumed that mail order sales and market stall sales for comparison goods will decline over this period, from 0.5% up to 2010 to 0.25% between 2011 and 2015.

5.12 Total Retail Sales From New Source of Supply

Total Retail Sales from New Sources of Supply in County Donegal, 2005 (£m 2005 prices)								
	Convenience				Comparison			
	2006-2010		2011-2015		2005-2010		2010-2015	
	Low	High	Low	High	Low	High	Low	High
New Retail Outlets	33.1	33.1			25.8	25.8		
Turnover Efficiency	0	0	0	0	16.8 1.32	16.8 1.32	17.65 1.38	17.65 1.38
"Other" Retail Sales	0	0	0	0	16.5	17.4	28.7	31.4
Retail Sales from New Sources of Supply	33.1	33.1	0.0	0.0	60.4	61.3	47.7	50.43

Table 12: Total Retail Sales from New Sources of Supply in County Donegal, 2005

5.13 Retail Floorspace Capacity

The additional expenditure potential for retail goods for the County is calculated by subtracting the retail sales figures for new sources from the estimated additional expenditure.

Net Additional Expenditure Potential for Retail Goods in County Donegal, 2005-2015 (€m 2005 prices)								
	Convenience				Comparison			
	2005-2010		2011-2015		2005-2010		2011-2015	
	Low	High	Low	High	Low	High	Low	High
Additional Expenditure Potential	93.1	109.9	89.1	111.0	132.7	163.0	137.0	173.6
Retail Sales from New Sources of Supply	33.1	33.1	0.0	0.0	60.4	61.3	47.7	50.4
Net Additional Expenditure Potential	60.0	76.8	89.1	111.0	72.3	101.7	89.3	123.2

Table 13: Net Additional Expenditure Potential for Retail Goods in County Donegal, 2005-2015

Estimates for additional floorspace required in the County up to 2015 are then derived from the net additional expenditure potential divided by the estimated turnover ratios for retail outlets in the County currently (€11,305 for convenience and €2,421 for comparison).

Net Indicative Floorspace Potential in County Donegal 2005-2015				
	Convenience		Comparison	
	Low	High	Low	High
2006-2010	5307	6793	29864	42007
2011-2015	7881	9818	36886	50888

Table 14: Net Indicative Floorspace Potential in County Donegal 2005-2015

The estimates increase the potential significantly for comparison retailing, but it is noticeable even in the short term there is capacity to accommodate over 5,000 m² of additional convenience floorspace.

Note: It is not proposed to break this floorspace assessment down to individual towns, as this would be too prescriptive, and of no real benefit. The additional floorspace identified above is to be taken as a guideline only.

6.0 Development Strategy

6.1 Objectives

The objectives below are derived from the County Retail Strategy and are herein repeated having regard to the need to ensure consistency within the retail hierarchy.

Objective 1

To improve the retail profile and competitiveness of County Donegal within the retail economy.

Objective 2

To address leakage of retail expenditure from the County by providing the means to strengthen the range and quality of its retail offer.

Objective 3

To ensure an equitable, efficient and sustainable spatial distribution of main centres across the County.

Objective 4

To establish a hierarchy which assists the definition of the County's spatial strategy and provides clear guidance on where major new retail floorspace would be acceptable.

Objective 5

To promote retail centres in the Donegal Gaeltacht to ensure achievement of objectives 3 and 4 and the continued preservation and extension of the Irish Language in this area of the County.

Objective 6

To encourage and facilitate innovation and diversification in the County's retail profile and offer.

Objective 7

To encourage and facilitate and re-use the re-use and regeneration of derelict land and buildings for retail uses, with due cognisance to the Sequential Test.

Objective 8

To promote and sustain the importance of retailing in the County's tourism economy particularly in small and rural centres.

Objective 9

To encourage and facilitate the preservation and enhancement of the retail role of small villages around the County.

Objective 10

To provide the criteria for the assessment of retail development proposals.

Objective 11

To locate regionally focussed comparison and retail warehousing primarily in appropriate locations within the Letterkenny - Derry Gateway, Gateway Corridor, and Inter - Gateway Centres.

Objective 12

To encourage increased convenience provision in appropriate locations to reduce overtrading and aid a better shopping environment.

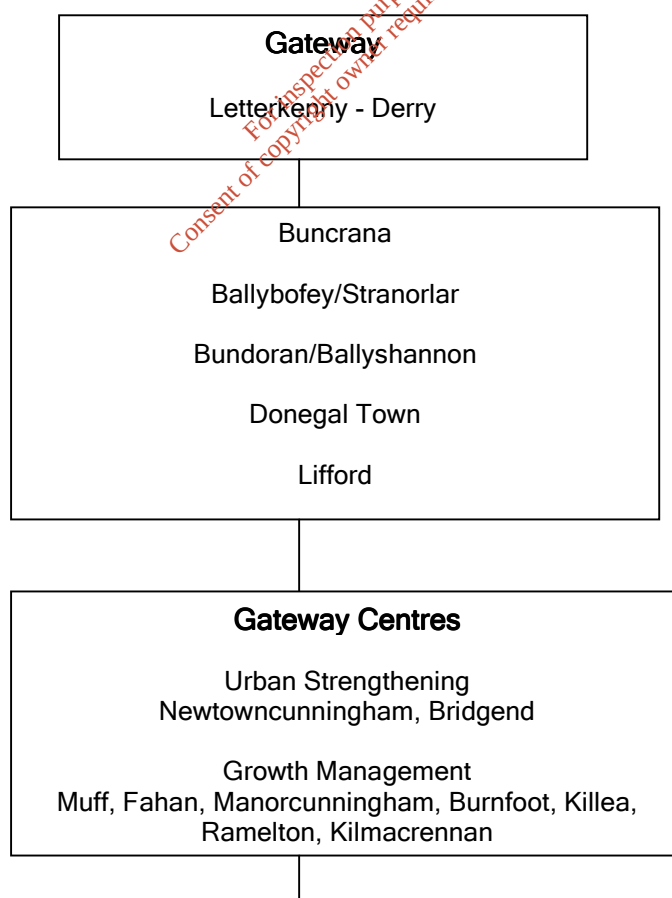
6.2 Retail Hierarchy

As indicated earlier in this document, the Letterkenny Retail Strategy is framed within the Retail Hierarchy of the County Retail Strategy. The Retail Hierarchy for the County consists of a number of different retail centre types and is based on a fusion of the following:

- The 2002 DTZ Pinda Retail Strategy Hierarchy, including the review of key settlements, Household Survey, Shoppers Survey, Health Checks
- Retail Strategy updates (2005) conducted by RPS Planning & Environment, including updates Health Checks, demographic and floorspace figures, retail expenditure and floorspace requirements,
- Review of national and regional policy development including the National Spatial Strategy, the updated Retail Planning Guidelines and the Border Authority Regional Planning Guidelines,
- Review of local policy development including the County Donegal Development Plan 2006-2012 (particularly the County Spatial Strategy, Transportation, Employment and Housing policies and objectives) and various Local Area Plans,
- Updated information on retail trends, economic growth, and currency fluctuations.

In addition, the County Retail Strategy demonstrates the correlation of the Retail Hierarchy against County Development Plans Spatial Strategy.

6.3 Retail Hierarchy for County Donegal



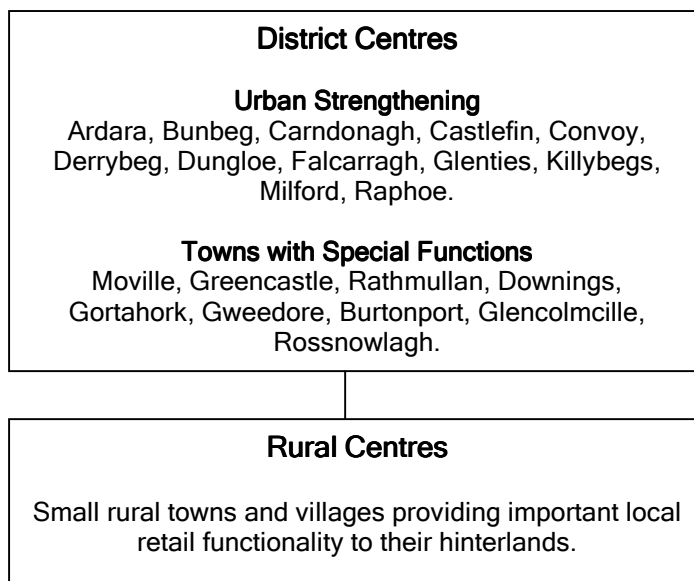


Figure 1: Retail Hierarchy for County Donegal

6.4 The County Retail Strategy sets out the preferred retail use for various centres with the Retail Hierarchy and is repeated below:

Retail Centre Type	Preferred Retail Use for Various Centres		
	Convenience	Comparison	Bulky Goods
Gateway	Regional Shopping Centres Large Superstores Discount Foodstores	Regional Shopping Centres Large higher order Clothing, Household Goods, Personal Goods Stores Large Department stores	Retail Outlets selling bulky goods. Retail Outlets ancillary to industrial light manufacturing, and service activities.
Gateway Centres - Urban Strengthening	Supermarkets ⁶	Local Small Floorspace Shops	Limited Retail Warehousing and Factory Outlet
Gateway Centres - Growth Management	Supermarkets	Local Small Floorspace Shops	
Inter-Gateway/Strategic Transport Corridor Centres	Shopping Centres Superstores Discount Foodstore	Shopping Centres Stand Alone Higher-Order Comparison Stores	Retail Warehousing Retail Parks Factory Outlets
District Centres- Urban Strengthening	Supermarkets	Local Small Floorspace Shops	Limited Retail Warehousing and Factory Outlet
District Centres - Towns with Special Functions	Supermarkets	Local Small Floorspace Shops	
Rural Centres	Local Shop	Local Shop	N/A

Table 15: Preferred Retail Use for Various Centres

⁶ The eventual size of any supermarket be appropriate to the level of growth projected for each centre.

The Sequential Approach

At specific site level the Sequential Approach developed in the Retail Planning Guidelines should remain the chief guide for deciding where new retail development should be located and distributed.

The Sequential Approach identifies the following preferred locations for new retail development in descending order:

1. Zoned **town centre** areas
2. If a town centre is inappropriate, unsuitable or unavailable then **edge of centre** areas within 300-400 metres of the town centre
3. **Out of centre** sites should be considered only after town centre and then edge of centre sites can be conclusively discounted in terms of size, availability, accessibility and feasibility.

6.6 Site Specific Retail Locations set out in the Letterkenny & Environs Development Plan 2009-2015.

The following table sets out the preferred retail locations for the town as set out in Volume 1 of the Letterkenny and Environs Development Plan 2009-2015.

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6.7 Preferred Retail Locations

Preferred Retail Locations in Letterkenny within Volume 1 of the Letterkenny & Environs Development Plan 2009-2015				
Retail Centre Type	Location	Plan Objectives	Retail Location	Recommended Retail Development
Letterkenny	Gateway			
	Town Centre	To create a vibrant, multifunctional, and accessible urban environment, with a high architectural character, and a quality public realm.	Defined Town Centre.	Regional, County, District and Local Scale Comparison, Convenience and Bulky goods. This includes: • Regional Shopping Centres. • Large Superstores. • Discount Foodstores. • Large higher order clothing, household and personal good stores. • Large Department Stores. • Retail outlets selling bulky goods. • Retail Outlets ancillary to industrial light manufacturing, and service activities. This excludes certain retail developments not suited to town centre locations (e.g. Car Showrooms).
	Outside the Town Centre	To provide a sufficient quantum and range of neighbourhood retail floorspace.	Outside the Town Centre	Limited and Local scale convenience and comparison (e.g. Local Grocery Store, Pharmacy, Hairdressers etc) intended primarily to serve a Neighbourhood need.

Table 16: Preferred Retail Locations in Letterkenny within Volume 1 of the Letterkenny & Environs Development Plan 2009-2015

7.0 Specific Retail Policies and Proposals

This section details a number of specific policies in order to further realise the objectives of the Retail Strategy.

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7.1 Retail Strategy Policies

Retail Strategy Policies		
Policy Reference	Policy/Objective	Actions
Policy RS1: Letterkenny Linked Gateway	It is an objective of the plan to: • Achieve a critical mass of retailers within the defined town centre. • Provide a diversity of different retailing types (comparison and convenience) and sizes throughout the town centre. • Establish a strong and competitive retailing environment including a strong independent retailing sector. • Develop an integrated retail environment accessible by a range of transportation modes. • Create an attractive retail environment in terms of overall design and the quality of the public realm.	• Ensure that all future retail applications: → Adhere to the sequential test in terms of their location. → Form part of a mixed-use development proposal, which provides for a mix of unit sizes located along active and visually pleasing frontages. → Are readily accessible by sustainable modes of transportation from other areas of the town centre. → Provide for the highest quality in terms of overall design, contributes to the public realm and satisfactorily integrates with the surrounding townscape. • Promote retail development at key back land locations adjacent to the Main Street and at strategic locations on lands East of Pearse Road. • Safeguard and enhance key pedestrian linkages (and develop new linkages) between the lands East of Pearse Road.
Policy RS8: Innovation in the County's Retail Offer	It is the policy of the Councils to encourage and facilitate innovation in the County's retail offer and attraction.	• Utilise Letterkenny's Linked Gateway status to encourage a wider range of higher order retail functions comparable to a Retail Planning Guidelines Tier 2 Centre (e.g. Limerick, Waterford, Galway). One of the main areas for development should be in retail warehousing of higher-order bulky goods to attract shoppers from throughout the Northwest region and from

		Northern Ireland. Monitor emerging trends and innovations in the EU and US retail sectors. The nature of the different innovations normally demands certain thresholds and characteristics to prevail. The baseline for the Strategy provides this information but it is essential that this is kept up to date in order that the County can sell itself when the opportunities arise.
Policy RS9: Re-Use and Regeneration of Derelict Land and Buildings	It is the policy of the Councils to encourage and facilitate the re-use and regeneration of derelict land and buildings in both main and smaller centres	- Review the constraints pertaining to the Town Renewal/IAP designated programme areas across the County to date and communicate issues to Department of the Environment, Heritage & Local Government in which achievement of objectives has been limited. - Review of the scope and area of these initiatives in the context of the County Retail Strategy with a greater focus on how these key buildings are areas can contribute to realising the retail potential within or on the edge of the main centres.
Policy RS10: Retailing in Tourism	It is the policy of the Councils to encourage and facilitate the development of retailing within the tourism sector.	Larger scale tourism related retailing projects, overall, tend to be unique and driven by entrepreneurs that have a commitment and vision. The feasibility of such ventures will be the promoters' risk. However, given the importance of these niche areas in the County's retail offer then the Councils should do all in its power to assist in making such schemes happen. However, assistance must be guided by consideration of the sequential approach and the capacity of different centres to integrate and benefit from such schemes. These factors acknowledged, such schemes should, overall be considered outside the broad assessment of capacity potential.

Policy RS11: Enhancement of Towns and Villages	It is the policy of the Councils to encourage and facilitate enhancement and environmental improvement of the Urban form.	- Establish a mechanism to assure the highest quality of design in retail/town centres developments, including: → Undertaking a Character Appraisal. → Preparing a design guide. → Setting up a Design Panel which could have local or national professional, business or public agency representatives.
Policy RS12: Discount Foodstore Development	It is the policy of the Councils to accommodate discount food stores as appropriate.	- Discount foodstores (approximately 1,000-1,500 m² gross floorspace) should be accommodated in the County's main retail centres in order to diversify the retail offer. - The re-use of existing non-retail or vacant premises should be promoted for these uses, subject to normal planning considerations and the sequential approach.
Policy RS13: Redevelopment of Redundant Brownfield Sites for Retailing Purposes	It is the policy of the Councils to consider the redevelopment of redundant brownfield sites for retail purposes subject to the sequential approach	- Proposals for the redevelopment of brownfield sites for uses including retailing should be considered on their individual merits, and should be focused on securing economic and/or infrastructural benefits. In considering such proposals the Councils will take into account the following factors: → The sequential approach; → Design, scale, massing and materials; → Landscaping; → Servicing and parking arrangements; → Accessibility by public transport; → Facilities for pedestrians and cyclists; → Employment opportunities; → Access for people with impaired mobility; and → Effect on the scale and character of the area.

Table 17: Retail Strategy Policies

7.2 Framework for the Assessment of Retail Developments - Planning Criteria

All retail developments will be considered against the following general Planning Criteria:

- The sequential test as identified in the Retail Planning Guidelines.
- The impact of the retail development on the vitality and viability of the town centre.
- Accessibility to/from the development by sustainable modes of transportation such as walking, cycling and public transport.
- The impact of the development upon the flow of vehicular traffic, both in the immediate vicinity of the development and in the wider area.
- Provision for car and bicycle parking in accordance with relevant technical standards.
- Achievement of the highest quality in the design of buildings and ancillary spaces.
- Compatibility with relevant Urban Design and Built Environment policies.
- The impact of the development on Historic Streetscapes, Protected Structures and Views and Prospects of special amenity value.
- The impact of the development on the flow of surface water.
- The impact of the development on residential and environmental amenities.

The above planning criteria is further expanded upon within the policies, zonings and spatial frameworks of the Letterkenny and Environs Development Plan.

7.3 Monitoring and Review

The County Retail Strategy has been founded on a sound basis of research, survey analysis, and published statistics and the Letterkenny Retail Strategy updates the County Strategy and extracts relevant information and policies in respect of Letterkenny. The strategies have been prepared during one of the most dynamic periods in the retail sector, as evidenced by the market interest in major scheme at key centres in the County. Having regard for the changing dynamics, there is a need therefore to ensure that:

- The Retail Strategy and its baseline are kept as up to date as possible.
- There is a means of monitoring progress with the implementation of policies.
- There is a mechanism that can enable change that is responsive to emerging trends and opportunities.

The above will be achieved by setting up a framework for regular monitoring and review. This will include:

- Monitoring of expenditure and population forecasts;
- The floorspace data to be kept up to date through planning consent monitoring of both new retail and change of use.
- House and shopper survey data to be updated every five years.

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 2

HOUSING STRATEGY

OCTOBER 2009

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1.0 Introduction

This housing strategy shall be implemented within the area of the plan described as the area of the Letterkenny and Environs Development Plan 2009-2015. This strategy is intended to be read in conjunction with the County Development Plan 2006 housing strategy which is set out in Appendix C and it will supersede the implementation of the Letterkenny Town Council Housing Strategy which was adopted in 2002 as a variation of the Letterkenny Urban District Development Plan 1993 and carried over to the Letterkenny and Environs Development Plan 2003-2009 as varied.

2.0 Current Housing Market Trends and Demographic Changes

The Letterkenny & Environs Development Plan 2003-2009 as varied oversaw a period of economic growth and major demographic changes in the County and Ireland as a whole which in turn seen unprecedented levels of demands for housing. This subsequently put pressure on house prices which rose significantly during this time. However, there has been a marked slow down in the Irish housing market over the last year, with a sharp decline in buyer confidence, tighter credit control arrangements and as such house prices have fallen. There has also been a strong pull back in house building with completions expected to sharply fall this year. There is no idea as to how much longer this down fall may last but a quick turn around is reported to be unlikely. There is also expected to be a sharp increase in the net outward migration. These market trends and migration forecasts will need to be taken into consideration in this housing strategy for the Letterkenny & Environs Development Plan 2009-2015.

3.0 Legislative Background

The Housing Strategy is prepared under Part V of the Planning & Development Act 2000 as amended by the Planning & Development (Amendment) Act 2002. The purpose of the Strategy is to ensure that the proper planning and sustainable development of the area of the Development Plan provides for the housing of the existing and future population of the area. The Strategy shall take into account the likely future need for housing, the need to ensure that housing is available for persons who have different levels of income, the need to ensure an appropriate mixture of house types and sizes and the need to counteract undue segregation in housing between different persons or different social backgrounds. In particular, a housing strategy shall provide that as a general policy a specified percentage, not being more than 20%, of land zoned residential use, or for a mixture of residential and other uses, shall be reserved under Part V.

4.0 Policy Context

The Housing Strategy, as part of the Letterkenny and Environs Development Plan 2009-2015, is prepared within the context of the following policy frameworks set out at a national and regional level:

- National Spatial Strategy and Regional Planning Guidelines: Letterkenny is a significant town, which has substantial capacity for development. It is identified as a large sized gateway linking with both Derry and Sligo and is envisaged as a nationally significant centre, whose location and scale support the achievement of the type of critical mass necessary to sustain strong levels of job growth in the region.
- Delivering Homes, Sustainable Communities 2007: ten-year key objective to build sustainable communities which are integrated and meet an individual's accommodation needs.



- The Social Partnership Agreement Towards 2016: ten-year framework to provide more people with access to home ownership.
- Both these policies underpin the approach to increased housing investment set out in the National Development Plan 2007-2013.
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities September 2007 aims to ensure that the design and layout of new apartments will provide satisfactory accommodation for a variety of household types.
- Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities May 2009. Aims to provide and support sustainable communities and improving quality of life by consolidating new growth, providing for high density residential development in the right locations, ensuring that they are well serviced in terms of public transport and community facilities and built to the highest possible standards.
- The above Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities May 2009 is accompanied by a companion document the Urban Design Manual, A Best practice Guide May 2009: this sets out and illustrates essential criteria for sustainable urban residential development and demonstrates how new development can be integrated and facilitated across a range of scale and locations.
- Guidelines for Planning Authorities on Residential Density 1999 is currently under review and will address specific issues and considerations for residential development not only in the larger urban areas but also in small towns and villages.
- County Development Plan 2006-2012: Promotes the Letterkenny-Derry linked gateway to channel investment into the area and create benefits for the entire County.
- Five year Action Plan for Social and Affordable Housing 2004-2008: Sets out the overall aims of social and affordable housing in County Donegal.
- The Traveller Accommodation Programme 2004-2008.
- Housing Needs Assessment 2005-2008 quantifies the social housing need for Donegal County Council as provided for in section 9 of the Housing Act 1988.

Since the last Letterkenny and Environs Development Plan has been published there has been a significant Government policy response in relation to the demand for housing and the subsequent effect on the environment. The above policy framework has introduced a strong Government emphasis towards delivering a high quality built environment, developing sustainable communities and contributing to increased quality of life which in turn should be a key consideration of this housing strategy. This National emphasis on delivering high quality housing and sustainable communities will directly inform the housing policies of this Plan and as such will focus on:

- Delivering sustainable, vibrant and socially inclusive communities where people want to live and,
- Developing residential neighbourhoods environments with an emphasis on high quality urban design.

5.0 Statistical Analysis

A statistical analysis was undertaken to interpret the housing supply and demand during the Letterkenny and Environs Development Plan 2003-2009 to inform the housing strategy for the Letterkenny and Environs Development Plan 2009-2015. In doing so, the comprehensiveness of the statistical analysis by the extent of the area to which statistics relate may change throughout the report in accordance with whether it

was the Letterkenny Town Council or Donegal County Council that correlated the data i.e. some statistics were available at the Town Council Area level and other statistics relate to the wider Letterkenny Electoral Area. The Housing strategy then informs housing objectives and policies arising from the key statistics that will be implemented within the lifetime of the plan.

5.1 Housing Construction

During the period of the Letterkenny and Environs Development Plan 2003-2009 as varied the housing construction rate in County Donegal has been consistently strong. The table below shows the total house completions in the County over the last 6 years has generally risen year on year.

Year	Total House Completions in Donegal
2002	2765
2003	3120
2004	2812
2005	3667
2006	4387
2007	4164

Table 1: Total house completions in Donegal County Council 2002-2007

Although the figures for 2007 are down slightly from the 2006 peak of house construction, figures for 2008 are predicted to significantly drop and experts envisage a further decline in 2009.

Data collected from the Letterkenny Urban Residential Commencement Notices in the table below received by the Building Control Authority correlate with the strong housing construction trend through the last Letterkenny Plan period.

Year	No. Residential Units Subject to Commencement Notices in Letterkenny Town Council Area
2003	19
2004	175
2005	245
2006	316
2007	144
Jan-July 2008	40

Table 2: Residential Commencement Notices in Letterkenny Town Council 2003-July 2008

The significant reduction in commencement notices in the figures for 2007 and for the first seven months in 2008 give an apparent indication that there is a house building slow down, in accordance with National predictions, which will in turn affect the completion rates in the County in the coming years.

This down turn in commencement of housing construction can also be seen on a County level with Government figures showing that the total amount of residential Units commenced in the County in 2007 was down 20% from 2006.

During the period 2002-2006 the percentage of public house completions in relation to all the houses constructed in County Donegal are as follows:

Year	% of Public House Completions
2002	22% (608 units)
2003	8% (250 units)
2004	10% (281 units)
2005	10% (367 units)
2006	5% (217 units)
2007	N/A

Table 3: Percentage of Public House Completions in County Donegal 2003-2007

After a large social housing provision in 2002 the number of units then reduced and marginally fluctuated thereafter on an annual basis.

5.2 Housing Units Grants

During the period August 2003 - July 2008 the combined total number of residential units granted planning permission within the Letterkenny Town Council area was 4743.

In terms of the types of houses built in the County, in 2006, Government statistics showed that just over half the houses built were scheme houses, a high percentage were individual houses and only a small percentage were apartments.

When analysing types of houses granted within the Letterkenny Town Council area in 2003-2008, only 2% of individual one off houses were built, which on an annual basis remained quite constant, with a slight reduction in 2007 (please see table below).

Multiple residential scheme applications (incorporating apartments) accounted for the remaining 98% of residential planning applications. The number of scheme units varied considerably on an annual basis. 2003 witnessed a low level of permissions for residential units preceded by a sharp rise in the following 4 years. 2004 and 2006 had a few exceptionally large residential scheme applications.

The high number of residential schemes would indicate a strengthening of the urban form in relation to densities and services within the Town Council area.

Year	No. of Multiple Residential Units	No. of Individual Residential Planning Units Granted
2003	139	18
2004	1108	19
2005	652	23
2006	1507	22
2007	1230	14
Jan-July 2008	7	4

Table 4: Number of Residential Planning Units Granted within Letterkenny Town Council

A substantial amount of residential units that have been granted within the plan area during the plan period have not yet been constructed. Comprehensive information at a plan level in relation to the total number of houses constructed is not available. However using a rate of 36% of all units granted are not yet constructed, in line with the methodology used in the County Development Plan 2006-2012, there could be approximately 1715 residential units that have been granted permission within the plan area during 2003-2008 that have not yet been constructed. This provides a substantial surplus of planning permissions for residential units that have not yet been implemented. These figures are presented as crude figures that provide a picture only of the level of supply within the plan area and are not presented as comprehensive and fully accurate statistics.

It can however be ascertained from calculating the amount of zoned residential land in the last Letterkenny Plan, that has planning permission or has since been developed, that there has been a 45% take-up of zoned 'residential' land within the plan area and therefore there is at least a surplus of 55% of 'residential' land that remains available for uptake.

In order to comprehensively monitor the amount of permitted residential units that have been completed, started and not yet commenced, an annual housing monitor system will be implemented during this plan period (as referred to in Policy H4). This will be conducted by a housing monitor whose responsibility will be to monitor the amount of residential units started, completed and not yet commenced on an annual basis.

5.3 Spatial Distribution of Housing Units Granted

The environs of Letterkenny have experienced significant pressure for residential development that is exemplified by available census figures that show a surge in the population of the environs. An analysis of the spatial distribution of planning permissions granted for residential units within the environs area shows a wide spread of planning applications throughout the plan area. It is apparent that over the last plan period that only a small amount of residential planning applications granted were located within the town centre area (as defined in the Land Use Map) and that the concentration of applications were outside the town centre on greenfield sites. The main concentrations of multiple residential applications granted were represented along the key arterial routes that serve the town, which has resulted in long spreads of housing developments. In particular major growth has taken place to the north of Letterkenny Town Council area namely along the

- N56 towards Mountaintop
- L-1174-1 in Glencar Scotch and Windyhall areas
- L1144-1 in the Lisnennan area
- Ballymacool area.
- Lismonaghan and Creeve areas to the south of old town.

The concentration of new housing development along these roads, at some distance from the town centre, with large areas of green space between the areas of built forms, have created large pockets of distinguishable residential developments that can be classed as neighbourhoods in their own right.

These apparent new neighbourhoods within Letterkenny Town Council should be identified in order to strengthen, consolidate and manage them in accordance with proper planning as advocated by National and Regional guidelines and also preventing further unsustainable sporadic development during this plan period.

Policies will focus on accessing each neighbourhood as to what services, amenities and infrastructure they each require to make them sustainable and attractive communities to live in, as well as an overall vision for the neighbourhood.

5.4 Projected Housing Need Over the Plan Period

Population projections outlined in the volume 1 of this plan in Part A, Section 1.0, predict that the population of the plan area, could on the highest growth scenario, reach 38,578 by 2020. Based on an average household size of 2.92 persons per household, this could give rise to a housing need of 3700 new housing units over this plan period while, on a longer time frame to 2020, there will be an additional need for a further 2875 new housing units.

In reviewing the land mass requirements in hectares within the existing plan, data showed that the land zoned as residential that is neither developed nor has planning permission amounts to a total of 343ha whereas need of land mass to 2015 is projected at only 106ha. Therefore, over the life of the plan, there is a surplus of residential land (238ha), which is sufficient to provide for the projected need for new housing to 2020 to meet the population projections of 38,578 persons.

Although a highest housing need scenario has been used, given the Gateway status of Letterkenny, the economic down turn and subsequent demographic implications are likely to produce a lower housing need. It is envisaged that when the new census data is collected in 2010, two years into the plan period, the demographics and population projections for the Letterkenny Town Council Area will be reviewed. If there are significant changes to the population projections and demographics predicted over the remainder of the Plan period, resulting in a causal affect to the housing need, policies will be amended where necessary.

5.5 Social & Affordable Housing

Part V of the Planning and Development Act 2000 requires that the housing strategy must make provision for both social and affordable housing. In this regards, this strategy defines social housing as rented housing provided either by the local authority or by a voluntary or co-operative housing body. Affordable housing is defined as owner-occupied, or shared ownership housing provided at a price below market value.

5.6 Existing Need for Social & Affordable Housing Within the Plan Area

The table below shows the social housing applications that the Letterkenny Town Council has received over the last plan period.

Year	No. of Social Housing Applications
2002	123
2003	205
2004	274
2005	406
2006	590
2007	271
Jan-July 2008	151

Table 5: No. of Social Housing Applications from 2002-Jul 2008 in Letterkenny Town Council

The figures show that there has been a steady annual growth in social housing applications with a reduction in 2007.

The total number of applications on the Social Housing List as of the 14.07.08 was 1021.

The table below shows the number of the 202 new social units that have been provided in the Letterkenny Town Council Area over the last 7 years on an annual basis. The figures show that there was a slow down in social house building when the private house building was at its peak in the County.

Year	2002	2003	2004	2005	2006	2007	Jan-July 2008
Number of Social units	35	56	14	14	14	64	5

Table 6: No. of New Social Units Provided from 2002-Jul 2008 in Letterkenny Town Council

There are exactly 408 properties belonging to the Town Council in Letterkenny as of 14.07.08. The properties are spread over 61 streets and housing estates. Only 11 of these streets and estates contain 10 or more social properties and only 3 of these would be classed as large estates containing between 56-60 units. It would appear that the properties are on the whole well spread and integrated throughout the Town Council Area.

5.7 Social Housing Need

The social housing need in Letterkenny Town Council as of 14th July 2008 is 1021.

5.8 Affordable Housing Need

Applications for affordable housing are generally not received until such time as the affordable housing is constructed and then advertised in the local newspapers. The table below shows the amount of affordable housing units that have been provided on an annual basis within the Letterkenny Town Council Area.

Year	2002	2003	2004	2005	2006	2007	2008
No. of Affordable Units	20	5	-	-	-	4	40

Table 7: Number of Affordable Housing Units Provided from 2002-Jul 2008 in Letterkenny Town Council

The table below shows that that affordable housing units are mainly designed as 3 bed properties.

Year	2 bed house	3 bed house	4+ bed house	2 bed apartment	3+ bed apartment
2002		20			
2003			5		
2004					
2005					
2006					
2007		4			
Jan-July 2008		40			

Table 8: Type of Affordable Units Provided From 2002-July 2008 in Letterkenny Town Council

5.9 Rental Accommodation Scheme Housing Need

The Rental Accommodation Scheme (RAS) dates back to 2004 and was designed to assist approved voluntary bodies to provide accommodation for persons in need of housing. It aims to transfer responsibility for housing SWA Rent Supplement Recipients (of 18 months plus) through the sourcing by housing authorities of accommodation from the private rented market or through other social housing measures over a four year period. Administered by Local Authorities the scheme is intended to provide an additional source of good quality rented accommodation for eligible persons.

Donegal County Council are currently in the process of implementing the new arrangements for RAS. The Rent Supplement clients of 18 months or longer which are to be moved to RAS will significantly increase the actual demand for social rented accommodation over the plan period. The figures in 2006 indicated that RAS could add on 20% to the social housing list when it is fully implemented.

Donegal County Council will be prioritising the long term housing needs of those who have not been given priority in the social housing schemes in the past namely single persons under sixty. Approximately 75% of all those on the RAS scheme require one or two bed roomed accommodation.

5.10 Delivery of Housing Under Part V

Within the Letterkenny Electoral Area 202 social units have been delivered under the Part V and 69 affordable units have been delivered under Part V during the last plan period.

5.11 House Types

The breakdown of house types in terms of social housing on the existing list are laid out in the table below.

No. of Bedrooms Required	No. Applicants on Current Social Housing List
1 bed property	484
2 bed property	274
3 bed property	169
4 bed property	94

Table 9: House Types Required for Applicants on Letterkenny Town Council Social Housing List as of 14th July 2008.

The table shows that 74 % of the applicants on the current social housing list need a 1 or 2 bed residential unit with 16% of applicants requiring a 3 bed property. This would indicate that a high percentage of smaller residential units are required to meet the needs of the social housing list.

The table below shows the number of bedrooms provided in the social properties that have been developed over the last plan period. 2002 and 2003 provided a mix of 2 and 3 bed units facilitating a range of housing needs. Over the following years only 3 bed units were provided together with a smaller proportion of 4 bed units.

Year	2 bed house	3 bed house	4+ bed house	2 bed apartment	3+ bed apartment
2002	12	17		6	
2003	24	27	5		
2004		12	2		
2005		12	2		
2006		12	2		
2007		61		3	
Jan-July 2008		3	2		

Table 10: House Types of Social Housing Provided from 2002-July 2008 in Letterkenny Town Council

There has been a significant change in demographics in Letterkenny and indeed the County as a whole which has mainly resulted in the shift in need away from larger family homes to the need for smaller units to accommodate single persons and single parents. As a result, targets need to be set at providing a larger percentage of 1 and 2 bed properties.

Smaller units are also required for applicants in the Rental Accommodation Scheme which targets single adults who have not been given priority on the housing list in the

past. Figures show that 75% of applicants are single people and single parents with one child.

In relation to affordable housing in the Letterkenny area, provision is intended to be in the main for 3 bed starter homes for young first time buyers.

5.12 Voluntary Housing

The number of voluntary housing provided in the Letterkenny Electoral Area over the last plan period totalled 153. The table below shows the amount of voluntary residential units that were provided on an annual basis. There is no specific waiting list for voluntary housing over the next plan period as applicants are taken off the social housing list.

Year	2003	2004	2005	2006	2007	Jan-July 2008
Number of Units	6	57	-	-	6	84

Table 11: Number of Voluntary Units Provided from 2003-July 2008 in Letterkenny Electoral Area

The table below shows the type of voluntary houses that have been provided over the same time period.

Year	Number of Family Units	Number of Sheltered Units	Number of Disabled Units
2003		6	
2004	34	7	16
2005			
2006			
2007			6
Jan-July 2008	29	39	16

Table 12: Type of Voluntary Units Provided from 2003-July 2008 in Letterkenny Electoral Area

5.13 Principle Reason for Housing Need

Both the Letterkenny Town Council and the Donegal County Council housing need information indicates that there is a change occurring in relation to the reason for housing need as indicated on applications for social and affordable housing. The table below highlights the category of need of applicants on the current Letterkenny Town Council social housing list:

Category of Need for Social Housing Applications	Share
Not Reasonably Able to Meet Cost of Accommodation	78%
Unfit Accommodation	1%
Medical or Compassionate Reasons	13%
Overcrowded Accommodation	3%
Involuntary Sharing	1.5%
Elderly	3.5%
Travellers	0%
Disabled	0%
Leaving Institutional Care	0%
Homeless	0%
Total	100%

Table 13: Principle Reason for Social Housing Need on Letterkenny Town Council Social Housing List as of 14th July 2008



The above table shows that unfit accommodation is at 1% and overcrowding is at 3% but that the main category of need is not reasonably able to meet the cost of accommodation. This demonstrates that the category of housing need has changed considerably over the last plan period wherein 66% of the demand for social housing arose from households who were living in unfit or unsuitable accommodation or in crowded conditions.

The category of need of those seeking voluntary housing is more specialised as shown in the table below. With 29% being elderly and requiring sheltered accommodation and 30% needing specialised disabled residential units.

Category of Need of Applicants that Received Affordable Housing During Last Plan Period	Share %
Not Reasonably Able to Meet Cost of Accommodation	37
Unfit accommodation	
Medical or Compassionate Reasons	
Overcrowded Accommodation	
Involuntary Sharing	
Elderly	29
Travellers	
Disabled	30
Leaving Institutional Care	
Homeless	4
Total	100%

Table 14: Principle Reason for Voluntary Housing Need of Applicants Who Received Voluntary Housing Units from 2003-July 2008 in Letterkenny Electoral Area

The statistics show that in Letterkenny, the principle reason for housing need is 'not reasonably able to meet the cost of accommodation'. The main reason indicated for why housing need is changing is due at least in part to rising house prices and changing economics. Although the average house price has fallen over this last year it is difficult to say whether this will increase affordability of buying a home given Donegal's reliance on employment in the construction sector, the lower industrial wages and the highest poverty index in the State.

5.14 Traveller Accommodation Need

The current Traveller Accommodation Programme 2005-2008 identified 47 families in need of permanent accommodation throughout County Donegal. Over the course of the programme 42 families have been allocated permanent accommodation. The table below shows the amount of traveller accommodation that was provided within the Letterkenny Electoral area.

Year	2005	2006	2007	2008
No. of Traveller Units/Accommodation Provided	2	4	6	6

Table 15: Amount of Traveller Accommodation Provided from 2005-July 2008 in Letterkenny Town Council

A new traveller programme will be set up in the coming year. In the absence of current traveller need statistics the 2007 census information provides information on families who are living in temporary accommodation in the Letterkenny Electoral Area

The annual census of Travellers in County Donegal completed in November 2007 identified 209 traveller families in the County. Of these 209 families 134 are located in the Letterkenny Electoral Area. Their current type of accommodation is set out in the table below.

Type of Accommodation	No. of Traveller Families
Group Housing	10
Housed	70
Permanent Halt	5
Private Rented	38
Sharing with Relatives	7
Temporary Halt	4

Table 16: 2007 Census Figures Showing Type of Accommodation Traveller Families are Residing in the Letterkenny Electoral Area

These statistics would suggest that there will be a need for permanent accommodation for Travellers in this plan period as there are families sharing with relatives and who are using temporary halts. At this stage it is envisaged that group housing and scheme housing can be provided under social and voluntary residential units. Although a transient halting site is required within the Letterkenny Electoral Area there is not a need within the Town Council Area at present therefore specific zoning is not required through this plan.

5.15 Meeting Needs

Meeting the housing need for social and affordable housing shall involve a range of allocation of tenancies under the Council's own social housing programme and the County Council's voluntary housing programme, the provision of assistance in the form of Loans Scheme, an Affordable Housing Scheme, the Traveller Accommodation Programme, and the Rental Accommodation Scheme.

The implementation of Part V is essential in order for the Councils to ensure the greatest output of social and affordable housing that can be achieved in the context of the legislative framework that is set out for delivery of such housing. In particular, having regard to the changing need for applicants on the housing list, the elements of Part V relating to affordable housing will be of critical importance and the delivery of adequate levels of affordable housing shall be an important challenge throughout the life of the plan.

6.0 Housing Strategy Goals and Objectives

6.1 Goal

To facilitate and support the provision of a high standard of accommodation to meet the needs of people of the area of the Letterkenny and Environs Development Plan 2009-2015 in a manner so as to ensure the proper planning and sustainable development of the plan area.

6.2 Objectives, Policies and Proposals:

1. To reserve 15% of land zoned for residential use or a mixture of residential and other uses for the provision of social and affordable housing. Exact percentages shall be subject to negotiation to meet the needs as determined.

Letterkenny Town Council and Donegal County Council shall continue to impose the following condition on all planning applications for housing on the relevant zoned lands: -

Prior to commencement of development, the applicant/ developer shall enter into an agreement with the Council under Section 92(2) of the Planning & Development Act 2000 as amended by Section 3 of the Planning and Development Act 2002 for: -

- a. Transfer of part of lands within application site; or
 - b. The building and transfer of houses within application site; or
 - c. The transfer of fully or partially serviced site with application site; or
 - d. Transfer of other lands; or
 - e. The building and transfer of housing on other lands; or
 - f. The transfer of fully or partially serviced sites on other lands; or
 - g. The payment of an agreed sum of money; or
 - h. A combination of (a) and any one or more of other options (i.e. (b) - (g))
- Reason: To comply with the Council housing strategy.*

2. Letterkenny Town Council and Donegal County Council will work in tandem so as to coordinate the delivery of social and affordable housing through Part V mechanism within the plan area that will meet identified needs.
3. The adoption of the Letterkenny & Environs Development Plan 2009-2015 shall provide a new policy framework for the delivery of social and affordable housing in Letterkenny.
4. The Councils will jointly identify social and affordable housing needs that are best facilitated by accommodation within town centres in lieu of greenfield sites. In doing so the Councils shall subsequently target the appropriate fulfilment of these needs by means of active consultation with landowners and developers.
5. To provide, through Letterkenny Town Council Civic Offices, advice to applicants in relation to the range of housing assistance available in accordance with all current schemes.
6. The purpose of this service is to ensure the availability of guidance to the public in relation to the range of options available and to assist in advising applicants of the most appropriate scheme to suit individual circumstances. In particular, this service is critical in terms of increasing delivery and participation in affordable

housing schemes in light of the changing categories of need that have been evidenced in the statistical analysis contained in this strategy.

7. Letterkenny Town Council and Donegal County Council will consult with the Department of the Environment, Heritage & Local Government and the relevant groups representing the range of disabled people to promote and develop the concept of lifetime adaptable housing to meet the needs of people with disabilities, the elderly, single persons and changing family situations.
8. Experience shall be taken from the construction of a lifetime adaptable house in Bruckless and Ballyshannon.
9. Priority will be placed on the early identification of needs in terms of lifetime adaptable housing together with appropriate tailoring of mix of house types to meet the identified needs.
10. Letterkenny Town Council and Donegal County Council propose to further
11. Bridge the gap between the housing waiting list and the various supply mechanisms through the continued active promotion of voluntary housing. Additional housing units supplied through the voluntary agencies to be also secured by way of turnkey and direct construction methods.
12. The Councils will continue their efforts to promote the activity of the voluntary housing bodies including implementation of guidelines for voluntary organisations in relation to how schemes are to be evaluated, so as to target schemes in areas of need as opposed to a development driven approach.
13. The Councils shall ensure a mix of social, affordable and private housing in all housing areas and the development of neighbourhood centres where appropriate by engaging in wide consultation with various agencies including the Housing/Building Strategic Policy Committee of Donegal County Council. Standards to be set and achieved in this activity to meet the accepted practice as set out in all relevant guidelines as issued by the Department of Environment, Heritage and Local Government, Volume 1 of the Letterkenny & Environs Development Plan 2009-2015 and the Childcare Strategy appended to this plan.
14. The requirement under objective 1 that 15% of all zoned lands be reserved for social and affordable housing in order to offset social segregation. The Councils will also take into consideration the size and location of individual turnkey, voluntary and purchase schemes to prevent over concentration of any one social group and to avoid over concentration of social and affordable housing in larger settlements.
15. The Councils will seek to develop a model concept of neighbourhood centre with a range of play and other facilities derived from experience of implementation of the Letterkenny Development Plan 2002 Housing Strategy and the first Housing Strategy adopted in 2002 as a variation to the County Donegal Development Plan 2000 in relation to the environs area of the plan. Experience shall also be drawn from implementation of policies and zonings set out in adopted Development Plans and Local Area Plans (e.g. Buncrana & Environs Development Plan, Ballybofey/Stranorlar Local Area Plan).
16. The Councils will further develop systematic monitoring and review systems to monitor the delivery of housing relative to demand and to avoid undue segregation in light of changing patterns of demand.

17. Annual reports will be prepared to monitor the procurement of housing and to review the need for agreements under Section 96(2). The monitoring system will ensure the update of a statistical analysis prepared as part of the County Donegal Development Plan 2006-2012 together with an update of the statistical analysis contained in this Housing Strategy as part of the Letterkenny & Environs Development Plan 2009-2015. The monitoring system will ensure the appropriate review of policy.
18. The Councils will strive to acquire and maintain a reasonable housing landbank for both general and specialised housing needs as part of its overall housing procurement policy with input of the Planning Section, the Housing Section and the support of Services supplying critical environment in maintaining a landbank consistent with the need for housing and the sustainable development of the County.
19. The Councils will acquire and maintain a housing landbank as part of its overall procurement policy. A more detailed landbank acquisition and utilisation policy will be prepared to guide location, scale and use of lands to be acquired.
20. The Councils will seek to allocate an adequate measure of funding through the annual Budget process and otherwise to maintain all of their rented stock to an acceptable standard and specifically to upgrade older stock using all available funding sources. Upgrading and maintenance of stock will be carried out in full consultation with tenants and residents associations with input from the Council's tenant liaison facility. Where relevant, linking of these proposals with private management agreements will be ensured.
21. The Councils will implement the Traveller Accommodation Programme 2004-2008 as adopted and prepare a new Traveller Accommodation Programme 2009-2013.
22. The Councils will strive to achieve appropriate house type mixes within developments that respond to the changing demographics of persons on the housing list and in doing so, shall consider the experiences drawn from the document entitled, "Mixed Tenure Housing Estates: Development, Design, Management and Outcomes", published by the Housing Unit.

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 2

DEVELOPMENT GUIDELINES & TECHNICAL STANDARDS

OCTOBER 2009

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1.0 Introduction

This section of the Plan sets out development guidelines and standards that will be required by new development in the Plan area, and indicates the criteria, which will be taken into account in considering applications for planning permission for new developments and where the Councils themselves undertakes development under Part XI of the 'Planning and Development Acts 2000 - 2006'.

The various standards are gathered under the headings of particular types of development. If any particular proposal does not fit into one of the set out categories below, the Councils will use their discretion and adopt the standards most suitable for the particular case.

These standards are provided to give a general guideline as to the Councils' requirements regarding particular detailed aspects of the design of developments, and are not intended to be, nor will they be applied in an inflexible way. Neither is it to be assumed that conformity with the standards set out hereunder will automatically entitle an applicant to receive planning permission. Good design is the paramount requirement, and all developments will be assessed in the light of the quality of their design and infrastructure.

Where reference is made to particular Guidelines by other bodies, their latest revision will be the guiding standard used.

2.0 Site Details

Applications for development will be required to be accompanied by sufficient details concerning the existing condition of the site, its environment and the character and condition of the surrounding area, so as to allow full and proper consideration of the development proposed.

The following details should be included where deemed appropriate by the Councils:

- a. A plan of the site at a scale appropriate to the size of the development showing:
 - i. The contours of the land;
 - ii. Existing vegetation;
 - iii. The location and material composition of boundaries;
 - iv. Existing buildings, structures and historical or archaeological features;
 - v. All existing and proposed pipes, culverts, septic tanks, wells, storage tanks and percolation areas;
 - vi. Existing roads, rights of way, footpaths and access tracks;
 - vii. Water courses, wetlands and water features;
 - viii. Land drainage;
 - ix. Lighting; and
 - x. Open space
- b. A description of the landscape character of the site and important views into and out of the site.

This does not preclude any standards set out in the '*Planning and Development Regulations 2001 - 2007*'.

3.0 General Employment

3.1 Development Guidelines & Technical Standards in respect of 'General Employment' Developments

1. A Traffic Transport Statement (TTS) shall accompany all planning applications.
2. Where Traffic Transport Assessments (TTA's) are required, they shall be carried out in accordance with the Traffic and Transport Assessment Guidelines as published by the NRA and DoEHLG.
3. Landscaping and in appropriate cases, buffer zones between different uses will be required to be provided.
4. Developers shall provide effective screening from the public road or residential areas.
5. A minimum of one third of the site shall be kept free from development, which shall be subject to a detailed landscaping scheme (development is defined as all buildings outside storage areas and site development works / service roads etc).
6. All external finishes of any development, including colour, shall integrate with existing development.
7. Car parking, commensurate with usage will be required to be provided in accordance with the Car Parking Standards in this Technical Appendix and policy provision of the Plan.
8. All car parking to serve employees and visitors shall be provided within the curtilage of the site.
9. Car parking areas shall be landscaped and planted with trees to minimise their visual impact.
10. All car-parking bays shall be a minimum size of 5m by 2.5m, clearly marked and maintained so as to remain visible.
11. All car parking and service areas shall be drained, graded and surfaced with tarmac or similar.
12. Covered bicycle parking provision will be required to facilitate visitors and workers.
13. All loading and unloading bays shall be a minimum size of 6m by 3m
14. All service areas shall be located entirely within the curtilage of the site with adequate manoeuvring space and a suitable means of access to the public road being provided.
15. Access shall be provided, and kept clear at all times, for emergency service vehicles.
16. All developments shall comply with guidelines for the control of noise. During the hours of operation, noise levels as measured at the boundary of the site, shall not exceed 5dBA above the ambient.
17. For National Roads all developments shall comply with the National Road Authorities' Guidelines for Noise and Vibration.
18. Developers shall indicate as part of the planning application, the proposed location of all extractor points.
19. All waste materials shall be stored to the rear of buildings in environmentally safe conditions to ensure runoff shall not seep into surface water drainage system.
20. All dangerous waste shall be stored in bunded areas.
21. All fuel connection points or similar discharge points shall be rollover bunded.
22. All runoff from bunded areas shall be collected and disposed of separately from surface water drainage.
23. All emission points from industrial or commercial buildings shall be minimum 3m above the apex of the roof, or as agreed with the Planning Authority.
24. No more than two vehicular accesses shall be permitted to any industrial or commercial developments, unless in exceptional circumstances.

25. The minimum radius of any entrance used by articulated vehicles shall be in accordance with the NRA DMRB with a minimum setback of any permanent barrier from the road kerb line/ edge line to be 20m. Turning movement (Autotrack) Analysis to be supplied with application.
26. Access roads including cul-de-sacs in industrial areas shall generally have a minimum width of 7.3m carriageway, two 2.0m footpaths and two 1.0m grass verges.
27. Planning Applicants will provide details of the nature of the proposed activities and of the means of controlling effluents, noise, solid waste and gaseous emissions from these activities together with ameliorative measures.
28. An Environmental Impact Assessment or Strategic Environmental Assessment may be required to accompany certain planning applications for industrial development in accordance with the provisions of the Planning & Development Regulations 2001 - 2007, and an Integrated Pollution Control Licence may also be required from the Environmental Protection Agency.

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4.0 Residential Development

4.1 Development Guidelines & Technical Standards in respect of 'Residential' Developments.

1. The Councils will use the 12 criteria set out in the DoEHLG publication, 'Urban Design Manual, A Best Practise Guide - February 2008', during both pre-application consultations and at planning application stage for housing schemes (See Policy H10 Core Document).
2. Proposals for all new housing estate development shall comply with these Development Guidelines & Technical Standards and to the DoEHLG publication, 'Quality Housing for Sustainable Communities', 'Best Practise Guidelines for Delivering Sustainable Communities, 2007' and with standards for construction set out in the document entitled 'Recommendations for Housing Areas in County Donegal' or any such revised version as agreed by the Councils.
3. In brown field and town centre locations, housing developments other than flats/apartments, will normally be required to provide a private outdoor space for each unit of approximately 30 sq. metres. Privacy is to be achieved by design, or by construction of rear boundary walls/fences.
4. Private back garden space of 48 sq. metres per unit for smaller houses (2 bedroom) and 60-75 sq. metres for 3/4/5 bedroom units as a minimum guideline should be provided with each unit. Smaller areas of private open space will be considered where the developer proposes semi-private enclosed landscaped space for use of the immediately adjoining residents.
5. Provision shall be made for the location of services underground.
6. As a guide two parking spaces per house shall be provided, located off the access road adjacent to the house. Grouped car parking will be considered having regard to housing size and mix.
7. As a guide rear boundaries shall ensure a minimum height of 2 metres, whether by wall construction or by retention of existing hedgerows.
8. Lateral or side building lines will be applied in low-density developments.
9. No maximum density for flats/apartments will apply in town centre locations. Proposals for flats/apartments shall be required to comply with the DOEHLG Guidelines to Planning Authorities, entitled 'Design Standards for New Apartments', published September 2007.
10. Prior to the commencement of development, housing developments shall be named and numbered by the developer in accordance with the Donegal Place names Committee. This should be done in a logical and sequential manner so as to facilitate ease of access by emergency services and the public. It will also be a requirement that developers install appropriate ramps, signage and lineage within housing developments prior to first occupation. In order to provide assistance with the naming of new residential areas, the Councils shall provide the Place names Committee with a list of planning applications.
11. In general, multiple residential developments shall include a minimum of 15% of the overall area reserved as public amenity open space.
12. Bonds to secure the satisfactory completion of site development works shall be provided by developers
13. Bonds are subject to review and bonds secured through banking institutions will generally be for a limited period. In the event that the development works have not been completed, a further bond will be required to be deposited with the Planning Authority and subject to approval of the authority may be set at levels commensurate with specified phasing.
14. In multiple housing developments, the current process of rolling over of existing cash deposits to subsequent phases shall be reviewed.

15. Development charges in respect of the provision of public services, roads, parking, storm drainage, open space, etc. shall be levied on housing developments in accordance with the respective Development Contribution Scheme of the Councils.
16. Regard must be had to the needs of the disabled and the elderly in the design of housing estates.
17. Bonds to ensure the satisfactory completion of site development works shall be provided by developers as follows: -

Development Type	Amount
Multiple Development	€2,539 per dwelling & €3,000 in respect of open space.

Bonds are subject to review and bonds secured through banking institutions will generally be for a limited period. In the event that the developments works have not been completed (in accordance with the terms of permission granted and to the satisfaction of the Authority), a further bond will be required to be deposited with the Planning Authority and subject to approval of the Authority may be set at levels commensurate specified phasing.

In multiple housing developments, the current process of rolling over existing cash deposits to subsequent phases shall be reviewed. In the interim period prior to the review of this process, rolling over of existing cash deposits will only be permitted following confirmation by the Planning Authority that the previous phase has been satisfactory completed (in accordance with the terms of the permission granted and to the satisfaction of the Authority).

4.2 The Procedures for Monitoring New Estates when Under Construction and the Take Over of Existing Estates.

4.2.1 New Estates (including under construction)

In order to facilitate the handover of New Residential Estates to the relevant authority, the Councils will offer developers the following options 1A or 1B at the commencement of the construction of the development.

Option 1A -Self Regulation

Self-regulation of construction standards will be allowed. Developers will have to satisfy the Councils that the qualified inspector, who will inspect and certify the works of the developer and the compliance with planning conditions, has professional indemnity insurance. Prior to take over the Councils will carry out inspections and satisfy themselves that the developer has satisfied the planning conditions. In such cases developers shall pay the costs of the inspections.

Option 1B - Continuous Council Involvement

The Councils at the invite of the developer will be involved in the building control of all new estates and work **alongside** the developer during the construction of the development. The Councils will become involved in these processes from the very beginning of the development to monitor all the work being carried out. The advantage of being involved from the beginning is that all underground works such as the laying of foul sewer or storm water drainage pipe can be monitored. Any problem that arises with these works can then be dealt with at that stage, alleviating any knock on effects

from that problem. The Councils personnel will monitor quality control during construction by the sampling and testing of materials to ensure that they satisfy the recommended specifications. The cost of carrying out such tests will be borne by the contractor. This process of testing will benefit both the developer and the contractor in ensuring a high standard of workmanship and material, therefore leading to improved quality within the development.

4.2. Take Over of Existing Estates

In order to facilitate the handover of Existing or Established Residential Estates to the relevant authority, the Councils will offer developers the following options 2A or 2B at the commencement of the construction of the development.

Option 2A - Resident Led Handover

Where the Councils cannot identify the developer or where the developer has ceased to trade, the primary responsibility for bringing the estate up to standard will rest with the residents. When such an estate is to be taken over, the Councils shall seek to ensure:

- A partnership be established between the Councils and the residents in the estate.
- An agreement programme of work be drawn up between residents in the estate.
- Funding scheme shall be agreed whereby the Councils, and the residents shall contribute towards the cost of the works.
- Schemes whereby residents can carry out the works involved will be promoted and supported by the Councils.
- On completion of the works, agreed the Councils will take over the agreed services. In some cases roads, sanitary services, public lighting or amenity areas will be separately taken over.

Option 2B - Developer Led Handover

Where a developer exists and can be clearly identified by the Councils, the Councils shall seek to ensure:

- A partnership be established between the residents, the developer, and the Councils.
- An agreed programme of work be drawn up between the residents, the developer and the Councils.
- Funding scheme shall be agreed whereby the developer, the Councils, and the residents shall contribute towards the cost of the works.
- Schemes whereby residents can carry out the works involved will be promoted and supported by the Councils.
- On completion of the works, agreed the Councils will take over the agreed services. In some cases roads, sanitary services, public lighting or amenity areas will be separately taken over.

5.0 Transport and Communications

5.1 Development Guidelines & Technical Standards in respect of 'Transport and Communications'

1. Requirement for Traffic and Transport Statement

All planning applications requiring an access on to a public road must be accompanied by a completed Transport and Traffic Statement, i.e. TTS 1 and a TTS.

2. Urban/Suburban Roadside Boundaries

Within urban/suburban context all roadside boundaries are to be maintained by the landowners to ensure vision line requirements are preserved. The Planning Authority shall encourage broadleaf planting along road fronting boundaries.

Where setbacks are required the following minimum standards as set out in Table 1 shall be complied with.

Road Type	Minimum Setback from Centre Line of Road
County Road	5.0m
Main/Regional	6.5m
National Secondary Road	10m
National Primary Road	12m

Table 1: Minimum Setback Distances for Boundaries from the Centre line of Road, Dependant on Road Type

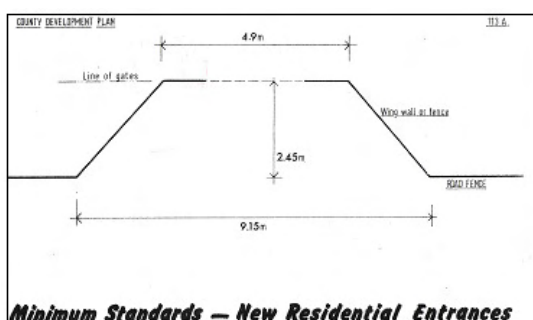
Should the existing roadside ownership boundary be further back than the setback identified in the table above, then that boundary shall be retained.

Should the existing adjacent roadside development boundary setback be less than that stated in the table above, the Councils shall decide the minimum setback.

3. Entrance Details

- Entrance details for residential properties shall be laid out in accordance with Figure 1 below and Table 1 above.
- For non-residential entrances the setback of entrance gates/barrier from road kerb shall be a minimum of 20 metres.
- Entrance radii for all developments other than single dwellings, shall provide public road/development junction radii in accordance with the National Road Authorities, Design Manual for Roads and Bridges (DMRB).

Figure 1: Entrance details for residential properties



4. Surface Water and Roadside Drainage

Existing roadside drainage shall be maintained and surface water road gullies or equivalent system shall be provided to cater for run-off from the public road. Suitable drainage systems shall be provided to prevent discharge of water from site onto public road or footpath (e.g. cattle grid system or slotted drainage block). Surface water systems shall preferably be routed to discharge to a watercourse, which is suitable to cater for the anticipated volume of water (soakpits shall not normally be encouraged). All proposed road works should include fully designed drainage systems to the final outfall.

5. County Road Junctions

It is an objective of the Councils to provide visibility splays at County road junctions.

6. Road Re-instatement

Any damage to public roads occurring as a result of a development shall be re-instated to the satisfaction of the Councils, where deemed necessary, a bond shall be imposed in this regard.

7. Building Setback on National and Regional Roads

A 50m building set back from the edge of the traffic lane on National Primary and National Secondary Roads shall be required. A minimum of 25m setback from outside edge of running carriageway on Regional Roads shall be required. Where existing buildings have formed an established building line, new buildings may follow the established building line, and the proposed set back may not be required.

5.2. National Roads (Primary and Secondary)

1. New Accesses

New accesses, developments requiring new accesses or which would result in the significant intensification of existing access points onto National Roads or roads treated to National Roads Standards (as identified in Guiding Development on Roads - County Donegal Development Plan - Core Document, Section 3.3) outside 60kph speed limit, shall not be permitted.

Intensification of an existing private road access onto a National Primary road shall be considered having regard to the length of that private road, the number of dwellings exiting onto the private road, and the design of the junction of the private road onto the National Primary Road.

2. Potential Permissible Development Accesses

Notwithstanding the above policy, the following categories of new development (detailed on Table 2) may be considered on National Roads and or roads treated to National Roads Standards (as identified in Guiding Development on Roads - County Donegal Development Plan - Core Document, Section 3.3) outside 60kph speed limit, where all of the four following criteria are met: -

- a. No other Non-National Roads access is available.
- b. Required visibility standards can be met.
- c. They do not conflict with other policy objectives in the Plan.
- d. The proposed access has been designed in accordance with the NRA DMRB.

Category 1	Residential Development by Replacement Dwellings
	Provision of a replacement dwelling where the existing occupied dwelling will no longer be occupied.
Category 2	New Industrial Development
	Industrial development tied to a fixed resource. Industrial development that has a large employment content (at least 30 employed) and with a properly designed and constructed junction in accordance with the DMRB.
Category 3	Replacement Access
	The creation of a new access point, which eliminates a traffic hazard from an existing, authorised use (Existing access to be closed). Extensions to existing Industrial/Commercial/Agricultural Premises. Extensions, which do not materially alter or intensify the character of the business and associated traffic intensification.
Category 4	Change of use of an Existing Structure
	Change within existing use categories. Change to a use with the same or lesser intensity of traffic usage.
Category 5	Others
	An access to facilitate a single dwelling for a person(s) who owned the site that is proposed for development, prior to 24 th March 2000, or for their immediate family member (This applies to National Secondary and excludes National Primary).

Table 2: Potential Accesses considered from National Primary Roads

3. For planning purposes in terms of development management, National Roads Standards will be applied to the Ramelton Road R245 to the Golf Course Road Junction from the Port Bridge Roundabout to the Ballyraine Creamery Roundabout and up to the (previously known as) UNIFI Site Junction.
4. All new development accesses affecting National roads or roads treated to National Roads standards (as identified in 'Guiding Development on Roads - County Donegal Development Plan, Core Document, Section 3.3') shall be designed and constructed in accordance with the National Road Authorities (NRA) Design Manual for Roads and Bridges (DMRB). The applicant shall submit a document demonstrating compliance with the NRA DMRB as part of the planning application.
5. Building Setback National Roads: 50m building set back from outside edge of running carriageway National Roads. Where existing buildings have formed an established building line, new buildings may follow the established building line, and the proposed set back may not be required. Any derogation will require the approval of the NRA.
6. Right Turning Lanes, Design Speeds and Visibility: With regard to such issues such as right turning lanes, design speeds and visibility on National Roads, the Councils will have regard to the relevant DMRB standards.

5.3 Non National Roads

5.3.1 Maximum Acceptable Gradients on Approach to Public Road

Table 3 below is indicative of maximum gradients permissible on access roads from developments onto public roads - refer to NRA DMRB for more detail:

Access Point	Section adjacent to Public Road	Maximum internal road gradient
Three Single (House) Dwelling Accesses or less	7m @ 4% gradient	10% gradient
Multiple Access with less than 500 AADT	15m @ 4% gradient	10% gradient
Multiple Access with greater than 500 AADT	15m @ 2% gradient	6% gradient

Table 3: Max. Permissible Gradient of Access Roads Entering or Exiting Public Roads

5.3.2 Vision Lines at Junctions with Non-National Public Roads

Permanent visibility splays shall be provided to enable emerging drivers using the direct access to have adequate visibility in each direction to see oncoming traffic in sufficient time to make their manoeuvre safely without influencing the major road traffic speed. Vision Lines at junctions with the Non-National Public Road shall be in accordance with Table 4, below. Deviation from the requirements in Table 4 may be considered upon certification by the Applicant's Designer to be designed and constructed in accordance with the NRA DMRB. The following diagram details the method by which the site envelope shall be calculated and presented for all planning applications.

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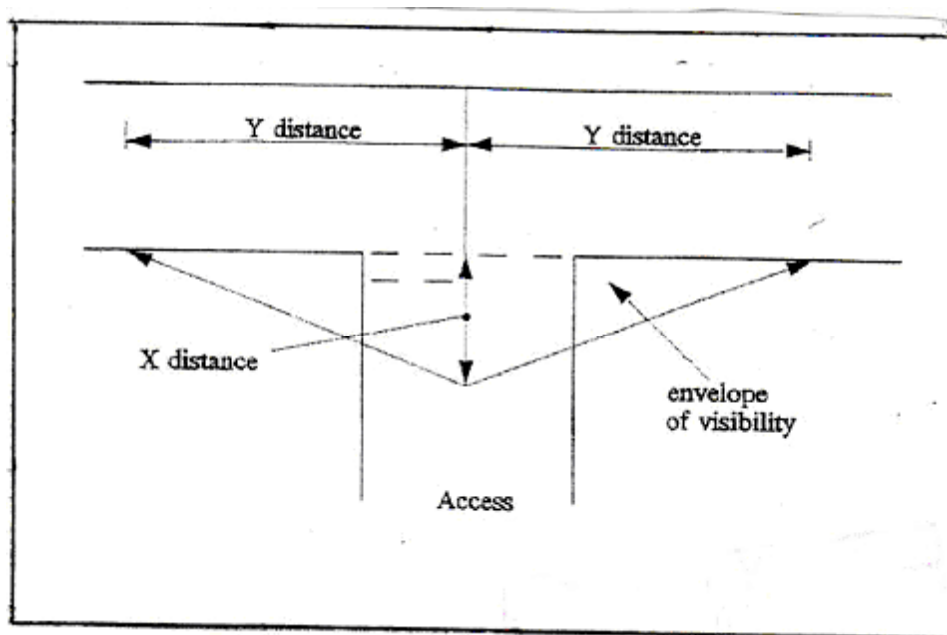


Figure 2: Illustrative Example of the Site Envelope

5.3.3 Definition of 'X' and 'Y' distances in Figure 2

The 'X' distance is referred to as the setback distance and shall be measured from the continuation of the nearer edge of the major road running lane (not from the continuation of the main road hard strip if this is present) along the centreline of the direct access. Where a hard shoulder on the major road continues across the line of the direct access, the 'X' distance shall be measured from the back of the hard shoulder.

The 'Y' distance is the minimum permissible vision line and shall be measured from a point on the nearer edge on the main road running lane to its intersection with the centreline of the access.

Visibility in the vertical plane shall be measured from a driver's eye-height of 1.05m and 2.0m positioned at the setback distance in the direct access to an object height of between 0.26m and 1.05m.

The following minimum vision lines shall be required at junction with public roads:

Vision Lines at accesses to Non-National Roads		
Type of Road	Regional Road	Local Road
Domestic Dwelling Single Access Point (Y * X)	90m-120m x 2.4m	70m-90m x 2.4m
Cul de Sac up to 6 dwellings (Y * X)	90m-120m x 2.4m	70m-90m x 2.4m
Direct Access/ Junction Point with design year* AADT<500 (Y * X)	120m-160m x 4.5m	90m-120m x 4.5m
Direct Access/ Junction Point with design year* AADT>500 (Y * X)	160m-215m x 9.0m	120m-160m x 9.0m
Note * Design year is 20 years after date of Planning Application		

Table 4: Minimum Vision Lines that shall be required at Junctions with Public Roads

Within speed limits minimum vision lines shall be determined by the Councils' Roads Department and will be based on the merits of each case.

5.3.4 Stopping Sight Distance

Minimum stopping sight distances on Non-National Roads shall be in accordance with Table 5 below. Deviation from the requirements in Table 5 may be considered upon certification by the applicant's designer to be designed and constructed in accordance with NRA DMRB.

Design Speed (km/h)	100	80	70	60	50
Stopping Sight Distance (m)	215	160	120	90	70

Table 5: Minimum Stopping Sight Distances

5.4 Pavement Improvements

The Councils will safeguard investment in road pavement improvements by encouraging pre-consultation with utility companies to ensure that underground utility lines are installed prior to pavement improvement where possible. In addition, the Councils will consult with utility companies with a view to developing an agreement on the procedures to be followed when installing utilities within public roads. It is anticipated that this will result in the formulation of a policy that will ultimately be adopted by the Councils.

5.5 Road Network Priorities

Tables 6 and 7 below highlights the strategic and key roads throughout the County that form both the strategic road network in the County and serve to make Letterkenny more accessible to other regions in the country and areas of the County. These roads and the key developmental priorities of the Councils.

Route Number	Route
M2/M3	Motorway/Dual Carriageway to serve the Northwest of Ireland
N14/N56	Letterkenny Outer Relief Road
N56	Mountain Top to Illistrin
N56	Pavement Strengthening + Minor Re-alignment and widening
N56	Port Bridge Roundabout - Ramelton Road - IDA Business Park Road - Pramerica Roundabout
N13	Ballyshannon to Beleek
N12 / N15	Pavement Strengthening and Localised Widening
N14 / A5	Manorcunningham to Strabane
N15 / N13	Ballybofey / Stranorlar Bypass
N56	Mountcharles to Killybegs
N56	Coolboy to Termon

Table 6: County Wide National Road List

Road Number	Route
R229	Port Bridge Roundabout - Station Roundabout - IDA Business Park Road - Pramerica Roundabout
R245	Letterkenny - Ramelton - Creeslough
R250	Letterkenny - Glenties

Table 7: County Wide Regional Road List

NB: - This table only lists the roads related to Letterkenny. Full countywide list contained in the County Development Plan 2006-2012.

Table 10 also highlights key significant roads and routes throughout the remit of the LEDP, the development of which in line with the Plan goals and objectives are essential in ensuring the continued strategic and sustainable growth of Letterkenny.

Other non-National Strategic roads (listed alphabetically)
Bonagee Link Road, Letterkenny
Fintown - Glencar Access Improvement Road, Letterkenny
Leck Road Eastern Link, Letterkenny
Leck Road Western Link, Letterkenny
Sallaghane Link Road, Letterkenny
Swilly Access Road, Letterkenny
Swilly Diversion, Letterkenny

Table 8: Other Non-National Strategic Roads relevant to the Strategic Growth of Letterkenny

NB: - This table only lists the roads related to Letterkenny. Full countywide list contained in the County Development Plan 2006-2012.

5.6 Developments - Required Infrastructure

Where the existing roads infrastructure is not adequate to support a proposed development in respect of road capacity, sight distances, footpaths, drainage and public lighting, the development shall not commence until the required infrastructure is fully in place.

Design and provision of the required infrastructure will be by agreement between the Councils and the developer(s).

Methods of improving or creating necessary infrastructure may include:

- The developer paying a development charge to the Councils to meet all of the estimated cost of upgrading the public roads infrastructure to meet the needs of the proposed development.
- The developer agreeing to carry out the upgrading of the roads infrastructure as determined by the councils

6.0 Car Parking

Car parking shall be required to be provided within the site of proposed developments or in exceptional circumstances at a location close to proposed development in accordance with Table 6 below. Development types not specified in Table 6 shall also be required to provide off street parking at a ratio reflective of anticipated demand as determined by the relevant-Planning Authority.

Land Use	Requirement	Cycle parking
Dwelling house	2 per house	With garage none. Without garage 1 secured space per unit.
Flats	1.25 per flat	1 secured space per flat or apartment
Shops	4 per 90 sq.m within speed limit 6 per 90 sq.m outside speed limit	1 space per 8 staff; 1 space per 90sq.m.
Offices	3 per 90 sq.m within speed limit 6 per 90 sq.m outside speed limit	1 space per 8 members of staff; 1 space per 90sq.m.
Banks	5 per 90 sq.m	1 space per 8 staff; 1 space per consulting room
Library	5 per 90 sq.m	1 space per 8 staff; 4 spaces per 90 sq.m
Hotel, Motel (excluding bars, function rooms to be calculated separately)	1 per 2 bedrooms within speed limit 1 per 1 b/room outside speed limit	1 secured space per 10 bedrooms; or 2.5 spaces per 90 sq.m of dining area; 4 spaces per 90 sq.m. of bar/dance floor
Pubs/Lounges without dancing areas	1 per 9.0 sq.m within speed limit 2 per 9.0 sq.m outside speed limit	1 space per 8 staff; 1 space per 90 sq.m.
Pubs/Lounges with dance areas, dance halls, function rooms	1.5 per 9.0 sq.m outside speed limit 3.0 per 9.0 sq.m outside speed limit	1 space per 8 staff
Restaurant	1 per 9.0 sq.m within speed limit 2 per 9.0 sq.m outside speed limit	1 space per 8 staff; 5 spaces per 90 sq.m
Schools	1 per classroom & bus & circulation/parking area adequate to service school population.	1 space per 8 staff; 1 space per 10 students (primary). 1 space per 8 staff; 1 space per 5 students (secondary).
Third level colleges	1 per classroom plus 1 per 6 students together with adequate bus circulation/parking area to serve school	1 space per 8 staff; 1 space per 5 students (third level).
Cinema	1 per 5 no. seats	1 space per 20 fixed seats
Theatre	1 per 5 no. seats	1 space per 20 fixed seats
Church	1 per 5 no. seats	1 space per 20 fixed seats
Manufacturing	3 per 90 sq.m or 1 per 4 no. employees whichever the greater.	1 space per 90 sq.m.



Warehousing	1.5 per 90 sq.m or 1 per 4 no. employees whichever the greater.	1 space per 90 sq.m.
Golf, pitch and putt	2 spaces per hole	
Golf driving range	1 per bay	
Bowling alley	1 per lane	1 space per 8 staff; .5 space per lane
Hospital	1.5 per bed	1 space per 8 staff; 1 space per 90 sq.m.
Guesthouse/B&B	1 per bedroom	1 secured space per 10 bedrooms
Nursing Home	1 per 3 bedrooms	5 spaces per 100 beds; 1 space per 8 staff
Surgeries	3 per consulting room	1 space per 8 staff; 1 space per consulting room
Takeaway	3 per 9.0m ²	1 space per 8 staff; 1 space per 90 sq.m
Sports hall/club	2 per 90 sq.m plus 2 per cent	2 spaces per 90 sq.m.
Cash & carry outlets	2 per 90 sq.m	1 space per 8 staff; 20 spaces per 1,000 sq.m
Hostel	1 space per bedroom	1 secured space per 10 bed spaces
Caravan/Camping Site	1 space per pitch	1 space per pitch
Medical/Dental/ Bank/ Financial/ Insurance	2 spaces per 90 sq.m.	1 space per 8 staff; 1 space per consulting room
Shopping Centre/Large Retail Store	5 spaces per 90 sq.m.	1 space per 8 staff; 2.4 spaces per 90 sq.m.
Petrol Filling Station	1 space per 90 sq.m.	1 space per 8 staff
Retail Warehousing	4 spaces per 90 sq.m.	1 space per 8 staff; 20 spaces per 1,000 sq.m
Amusement Arcades	1 space per 90 sq.m.	1 space per 90 sq.m.
Athletics/Playing Fields	5 spaces per track/field	2 spaces per track/field
Tennis Courts	1 space per court	2 spaces per court
Community Centre/Sports Centre	2 spaces per 90 sq.m.	1 space per 8 staff; 4 spaces per 90 sq.m

Table 9: Car Parking Standards

Notes:

Where reference is made to floor areas, it shall simply imply gross floor area.

A secured space is a space inside a building or structure where no part of the bicycle is accessible.

Dual use of spaces shall be permitted where it is clear to the Planning Authority that one of the uses are daytime uses and the other are evening use. Where it can be established that members of public visit the site by pre-arranged coach/bus cognisance shall be taken of same in calculating car-parking requirements.

Small extensions, which relieve overcrowding, shall be excluded from requirement to provide car parking, as shall first 28m² of new developments. Applications for change of use of property shall be required to provide car-parking equivalent to requirements for proposed new use.

Net public area shall be used in calculating car-parking requirements. Commercial properties shall be required to provide loading bays where appropriate as highlighted in Table 7.

Type	Dimensions
Car parking bay	5m x 2.5m
Loading bay	Designed and sized for appropriate Service Vehicles
Circulation Aisles	6m

Table 10: Dimensions of Car Parking and Loading Bays

The Planning Authority may seek financial contributions in lieu of actual parking spaces when the developer cannot conveniently provide the required spaces and / or the Councils wish to develop a centrally located car park rather than a number of individual car parks. The contribution per space will reflect the actual cost of developing the said alternative space.

6.1 Temporary Car Parks where the Councils Become Caretakers

The Councils will be prepared to enter caretaker agreements with landowners/property owners to provide car parking in towns whereby:

- The landowner retains full ownership and development potential of the lands concerned.
- The Councils will convert the lands into temporary car parking (usually for a period of at least 5 years).
- In this policy, adjoining lands owned by different landowners (backlands) may, by agreement with the parties, be aggregated into one single car park.

7.0 Development Contribution Scheme

The socio-economic development of the area under the Letterkenny & Environs Development Plan remit is dependent on the provision of the necessary infrastructural services by the Councils. Large sums have been and will continue to be expended by the Councils on the provision of these services without which many developments could not take place. It is considered reasonable that developers should contribute towards the cost of such service provision.

Section 48 of the Planning and Development Acts 2000-2004, enables Local Authorities, when granting planning permission, to include conditions requiring the payment of a contribution in respect of public infrastructure and facilities benefiting development in the area of the Planning Authority and provided by or on behalf of a local authority.

The Letterkenny & Environs Development Plan falls within the governing of two separate Planning Authorities, the Donegal County Council and the Letterkenny Town Council. Both of these Councils operate independent Development Contribution Schemes. Each individual applicant who receives or partakes in development will have to pay the Development Contribution Scheme charges relevant to the area that the development is located. Notwithstanding the above, and recognising their role as a Development Authority, the Councils will contribute to local development through various measures including the imposition of reduced levels of development charges and acceptance of payment of these charges on a phased basis where certain criteria is fulfilled.

The Councils will keep the Development Contribution Scheme under review during the period of this Plan. Charges may be increased to cover increased construction costs, inflation and external policy changes. Both the Donegal County Council and Letterkenny Town Council have recently reviewed their respective Development Contribution Schemes in February 2008.

The current Development Contribution Scheme charges, as adopted by both Letterkenny Town Council and Donegal County Council respectively, will apply to each planning application.

Under the Scheme, the Councils will, when granting planning permission under Section 34 of the Act, include conditions requiring the payment of a contribution in respect of public infrastructure and facilities benefiting development in and that is provided, or that it is intended will be provided, by or on behalf of the Councils, (regardless of other sources of funding for the infrastructure and facilities).

Car parking charges, where there is a shortfall, will be charged in accordance with the figures set out in the respective Development Contribution Scheme. Details of the current Donegal County Council and Letterkenny Town Council Development Contribution Schemes can be viewed on the Councils' respective websites at: -

www.donegalcoco.ie and www.letterkenny.ie

Note. Some exemptions and reductions within the Development Contributions Scheme apply (See website for details).

8.0 Petrol Stations

The following conditions will apply in respect of new petrol stations:

- Where appropriate a low wall, approximately 0.6m in height, shall be constructed along the road frontage.
- A maximum of 2 road access points shall be provided for, which will be designed and constructed in accordance with the NRA DMRB. The applicant shall submit a document demonstrating compliance with the NRA DMRB as part of the planning application.
- No advertising or commercial signage shall obstruct visibility over the site access points or front boundary/wing walls.

A shop/café of up to 100 square metres of net retail/café area may be allowed when associated with a petrol filling station. Where retail/café space in excess of 100 square metres of net retail/café area associated with petrol facilities is sought the sequential approach to such development will apply.

In order to protect the carrying capacity of national routes, new petrol filling stations requiring direct access onto such routes, will not be considered outside the 60kph speed limit. This policy will apply to:

- National Primary Routes.
- National Secondary Routes.
- For planning purposes in terms of development management, National Roads Standards will be applied to the Ramelton Road R245 to the Golf Course Road Junction, from the Port Bridge Roundabout to the Ballyraine Creamery Roundabout and up to the (previously known as) UNIFI Site Junction.

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9.0 Signage

This chapter gives detailed guidelines on the usage of signing within the Letterkenny & Environs Development Plan and the standards that shall be implemented.

General Purposes Directional Signage

This category relates to signage guiding road users in general and includes traffic signage, scenic/tourist drives and street/place names.

- An integrated network of scenic drives, incorporating existing and additional routes will underlie the Councils' approach and signage for these and existing routes will be based on distinctive logo's/symbols.
- Nameplates will be provided on local roads in rural areas.

Facilities and Attractions - Directional Signage

- This category covers finger post directional sign posting for public facilities i.e. post office, hospitals, health clinics, libraries, public toilets, landfill sites, swimming pools, airport, industrial estates etc.
- Tourist attractions (Heritage Centres, Museums, Interpretative Centres etc). Community Facilities (Community Centres, Sports facilities).
- Public and Community facility fingerpost signs must use an agreed colour (black and white) and tourist attraction fingerpost signs must use the standard brown and white colour. Logo's/symbols must be a dominant element of the sign.
- One fingerpost sign only within the speed limit area for each facility/attraction within that area will be the norm.
- For facilities/attractions outside a speed limit area, fingerpost directional signs (in required colours) will be permitted at appropriate junctions within an 8km radius of the facility/attraction.

B & Bs, Guesthouses, Hotels

- Directional Finger Post Sign (brown and white) at critical road junctions within 8k of premises.
- Within Speed Limit Areas.
- Individual business directional signs will not be permitted within speed limit areas.

Commercial & Business premises

- One finger post sign only, will be considered at a critical junction within the vicinity of the commercial/ business premises, and where a need is established.
- One advertising sign (for business and commercial premises) shall be considered within the curtilage of the business that it advertises.
- Sandwich boards shall not be permitted.

Welcome, Information & Interpretation Signage

- The provision of name/welcome, information and interpretation signage forms a significant part of the Councils' overall signage policy.
- At entry points to the town, the name/crest of the particular place should be the dominant element.
- At town entry points, the name sign should dominate, other signs i.e. Tidy Towns, Town Twinning etc. should be combined or located separately in advance information lay-by.

Information/Interpretative Signs

The Councils will initiate an information signage system, for public private and community business information through;

- Pilot scheme of Entry Point information lay-bys referred to above.
- Advance information lay-bys outside larger towns.
- Information points in public car parks in towns and villages.
- Interpretative Signs at areas of interest and historic significance, views and prospects.

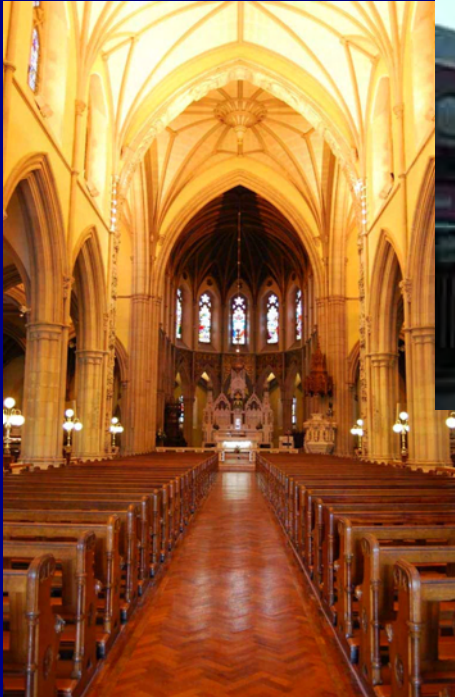
Advertising Signs

Advertising Signs (provide no directional value) will not be permitted in the open countryside or approach roads to the town. This includes large advertising hoardings and advance advertising for commercial facilities in the town. Such signs will be permitted in advance lay-bys only.

Advertising signs on approach roads shall not exceed 2.5 m in height or 3 sq. m in total area. Reflective material should not be used. This includes large advertising hoardings and advance advertising for commercial facilities. The Councils aims to actively promote the sharing of signage structures and the removal of inappropriate signage.

Signs proposed to be erected on public roadside verges (outside private property) require a license under Section 254 of the Planning and Development Acts 2000-2006.

DEVELOPMENT GUIDELINES & TECHNICAL STANDARDS



APPENDICES

Appendix A: Record of Protected Structures

KEY TO IMPORTANCE: A= Architectural, D= Detail Design, F= Archaeological Feature, G= Group, H= Historical, I= Interior, O = Other, P=Personality/Association, S= Streetscape/Setting, T= Technical, U= Unique//Rarity, V=Vernacular, (where appropriate).

Map Ref.	Dúchas Ref.	Location	Description	Importance	Rating
001	40501170	1. Mount Southwell Place	End-of-terrace, 3 bay, 1865-1870. 2 storey over basement house.	AG	Regional
002	40501171	2. Mount Southwell Place	Terraced 3 bay, 2 storey over basement house. 1865-1870	AGP	Regional
003	40503163	Mount Southwell Mews	End-of-terrace, 3-bay, 1865-1870 2-storey over basement house.	AG	Regional
004	40504072	Rosemount House, Rosemount Lane	Detached 4-bay, 2-storey house. Pre1858 (as directed by the Minister for Environment, Heritage and Local Government).	A	Regional
005	40500012	St. Conal's Psychiatric Hospital, Kilmacrennan Road	Mid Victorian 2-storey. Central section, 1860-1890 3-storey additions.	AGP	Regional
006	40501090	St. Eunan's College, College Road	3-Storey, symmetrically planned school building. 1900-1910.	AIGUD	Regional
007	40504052	Bank of Ireland, Upper Main Street	Detached, 4-bay, 2-storey former house. 1875-1880	AP	Regional
008	40502279	Courthouse, Upper Main Street	Detached, 3-bay, 2-storey over basement, 1825-1830 neo-Classical courthouse	A	Regional
009	40502086	Bank, Upper Main Street	End-of-terrace, 3 bay, 2-storey bank. 1900-1910	G	Regional
010	40501167	Conwal Church, Church Lane	Church of Ireland Parish Church. 1750-1790	AP	Regional
011	40501168	Cathedral of Saints Eunan & Columba, SENTRY Hill Road	French neo Gothic cruciform plan Cathedral 1890-1905	APD	Regional
012	40501199	Conwal Church, Church Lane	Conwal Parish Church graveyard. 1650-1940	HD	Regional

013	40504036	Ernest Speer, Lower Main Street	Terraced 3-bay, 1875-1880 2-storey shop retaining period shop front and interior.	AIG	Regional
014	40503214	Oldtown Bridge, Oldtown	Triple-arch road bridge over River Swilly 1700-1740.	D	Regional
015	40503215	Bridge, Oldtown	Disused single-span plated lattice-truss Railway Bridge. 1900-1905	HTD	Regional
016	40501164	Ardenaun, Cathedral Road	Detached six-bay, c. 1900. three storey over basement Bishop's Palace. <i>(as directed by the Minister for Environment, Heritage and Local Government).</i>	A	Regional
017	40502222	Donegal County Museum, High Road.	Detached five-bay, c. 1845, two-storey former workhouse and infirmary	A	Regional
018	No ref.	New Line Road	Single storey stone wash cottage with thatch roof.	A	Regional
019	40905303	Ballymacool House	Detached, five-bay three-storey over basement built c.1825	AH	Regional

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Appendix B: Recorded Monuments

Reference No.	Townland	Type
DG053-015	Castlebane	Ringfort - Cashel
DG053-017	Lisnennan	Ritual Site- Holy Well
DG053-018	Kiltoiy	Bullaun Stone
DG053-019	Kiltoiy	Church
DG053-019001	Kiltoiy	Graveyard
DG053-021	Carnamogagh Lower	Bullaun Stone
DG053-022	Ballymacool	Cashel
DG053-023001	Ballymacool	Ringfort - Unclassified
DG053-023002	Ballymacool	Souterrain
DG053-024	Ballymacool	Ringfort - Unclassified
DG053-025	Sallaghagrane	Standing Stone
DG053-026	Ballyraine	Ringfort - Unclassified
DG053-030	Ballymacool	Souterrain
DG053-031	Ballymacool	Souterrain
DG053-032	Oldtown	Standing Stone
DG053-033001	Oldtown	Church
DG053-033002	Drumnaoagh	Ritual Site- Holy Well
DG053-033003	Drumnaoagh	Bullaun Stone
DG053-033004	Drumnaoagh	Graveyard
DG053-034	Scribbly	Enclosure
DG053-035	Bunnagee	Bullaun Stone
DG053-045	Lisnennan	Souterrain
DG053-046	Ballymacool	Mass Rock
DG053-047	Sallaghagrane	Enclosure

Reference no. refers to identification in 'County Donegal, Recorded Monuments', published by Archaeological Survey of Ireland, The Office of Public Works. Recorded Monuments can also be viewed via the internet on :

www.archaeology.ie/ArchaeologicalSurveyofIreland/

Note: the above table highlights all acknowledge monuments within the Plan boundary acknowledged by the Councils. It must be noted that the collection of data and the review of the Record of Monuments is a continuous process and may include further additions during the lifetime of the Plan.



Appendix C: Natural Heritage Sites

Site Name	Designation	Site Code
River Swilly Valley Woods	Natural Heritage Area (NHA)	002011
Lough Swilly	Natural Heritage Area (NHA)	000166
	Candidate Special Area of Conservation (SAC)	002287
	Special Protection Area (SPA)	075

Natural Heritage Areas (NHAs)

Under the Wildlife (Amendment) Act 2000, Natural Heritage Areas (NHAs) are legally protected from the date they are formally proposed. Natural Heritage Areas represent the basic designation for wildlife protection. A list of these areas are shown in Section 6.4 and further information and updates are available on-line at:

www.npws.ie/en/Conservationsites/NaturalHeritageAreasNHAs/

Special Areas of Conservation (SACs)

Under the 1992 European Union Habitats Directive (92/43/EEC), Special Areas of Conservation are selected and designated. They are transposed into Irish law under the European Union (Natural Habitats) Regulations 1997. Special Areas of Conservation are prime wildlife conservation areas considered to be important at Irish and European levels. Under the directive certain habitats and species must be afforded protection. A list of these areas is shown in Section 6.5 and further information and updates are available on-line at:

www.npws.ie/en/Conservationsites/SpecialAreasofConservationSACs/

Special Protection Areas (SPAs)

Under the 1979 European Union Birds Directive (79/409/EEC). Special Protection Areas are selected and designated for the protection of birds, especially listed rare and vulnerable species and regularly occurring migratory species. Also protected under the directive are wetlands, especially those of international importance, that attract large numbers of migratory birds. A list of these areas is shown in Section 6.5 and further information and updates are available on-line at:

www.npws.ie/en/Conservationsites/SpecialProtectionAreasSPAs/

Statutory Nature Reserves

State-owned areas (or private lands in agreement with the landowner) that are set aside for the conservation of fauna, flora and their habitats. They are protected under Sections 15 and 16 of the Wildlife Act 1976. A list of these reserves is shown in Section 6.5 and further information and updates are available on-line at:

www.npws.ie/en/NatureReserves/Donegal/

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 3

ENVIRONMENTAL REPORT

OCTOBER 2009



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1.0 Non Technical Summary

1.1 Introduction

This section outlines the non- technical summary of this environmental report.

1.2 Context

The Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. no 436 of 2004) gave effect to the SEA Directive 2001 (2001/42/EC) so as to integrate SEA into current plan making procedures. The integration of SEA procedures into the plan process results in the systematic evaluation of the likely significant impacts on the environment of implementing a plan or programme.

Letterkenny Town Council and Donegal County Council in their joint responsibility for the review of the Letterkenny & Environs Development Plan 2003-2009 (as varied) and preparation of a new development plan, have also carried out a Strategic Environmental Assessment in tandem with the preparation of the plan as the population of the plan area is greater than 10,000 persons.

The environmental report outlined on the following pages sets out the sequential assessment of the strategic objectives and policies of the plan.

1.3 Methodology

The methodology utilised consisted of a number of sequential steps summarised as follows:

- Consideration of relevant plans and programmes at regional, national and international level.
- Collation of baseline information.
- Establishment of environmental protection objectives.

- Consideration of alternatives.
- Assessments of plan aim, strategic objectives, plan objectives and policies.
- Identification of mitigation measures.
- Identification of monitoring programme.

1.4 Collation of baseline data on the current state of the environment.

Baseline data was collated using a number of sources namely:

- Census of Population, Central Statistics Office
- Background Population Paper, central Planning Unit, February 2008.
- Donegal County Council, Water, Environment & Emergency Services.
- Donegal County Council, Geographic Information Systems.
- EPA website
- EPA bathing water publication (annual)
- NWIRBD website (Interactive Reporting Tool)
- EPA, Assessment Report on Air Monitoring in Letterkenny.
- EPA 'Environment in Focus 2006, Environmental Indicators for Ireland.'

In order to inform the collation of baseline data on the current state of the environment, an additional study in relation to biodiversity within the plan area was commissioned. The study was carried out by Glás Enviro Teo, Environmental Consultancy.

1.5 Consideration of alternatives

Three strategic alternatives were considered, namely:

- Continuation of existing policy framework.
- Planning for neighbourhoods.
- Sustainable development of the Gateway.

As a result of the assessment, strategic alternative c) 'Sustainable development of the Gateway', was identified as the preferred growth strategy.

1.6 Assessment

Population:

The population of the plan area in 2006 is 19,363 persons representing a high percentage of growth since 2002 at a rate of 21.6%. In particular there is a higher than average in migration level. The population is projected to grow to between 37,000 - 39,000 by 2020. As a result the plan makes adequate provision of housing land to meet this need. The plan places an emphasis on the requirement to ensure quality in all aspects of new growth in the plan area so as to provide an environment for integrated sustainable neighbourhoods, which will have knock on improvements in relation to quality of life. It is noted that a significant area of land is zoned for the purposes of residential development in the environs of the plan area. Having regard to the location of this land, it is noted that there will be negative impacts in relation to human health (accessibility), landscape, biodiversity.

Biodiversity:

There is a high level of biodiversity throughout the plan area and in particular there are three special areas for consideration at (1) Ballymacool Woods, Whinney Hill, Rodgers Burn, Drum Hill (2) Kilty Woods and (3) River Swilly. In addition there are 4 European protected sites within the plan area. The planning framework aims to give the highest level of protection to the European protected sites and to the special biodiversity areas. It is noted that special area at Rodgers Burn is identified both as 'recreation and open space' and for 'residential development' and will require careful assessment in the first instance through the roll out of design briefs as the plan may result in significant negative impacts in terms of landscape in the event that quality layout and design is not achieved.

Geology Soil:

The underlying geology of the area comprises 3 rock types as follows: Termon Formation (Schist), Lower Crana Quartzite and Dungiven Limestone. Soil types are shallow to moderate depth peaty podzols and established podzolic types with a moderate percentage of loam and sandy clays. The plan will not have significant effects on geology/soil.

Air/noise and climate:

Air quality monitoring carried out by EPA in Letterkenny has indicated that air quality level in Letterkenny at present is very good. Having regard to the extensive area of the plan and therefore the associated dependency on the private car, it is possible that these will be negative affects in relation to biodiversity. To counter this, the plan therefore aims to ensure the integrate of neighbourhood level facilities so as to encourage walking and cycling.

Water:

The plan area lies within the River Swilly catchment draining to Lough Swilly and the plan area is located in part on the natural flood plain. River water quality data generally shows an unpolluted indicator. Water supply capacity is restricted within the plan area and is being addressed through a number of schemes including the significant Letterkenny/Lough Mourne Scheme. Letterkenny is served by the Letterkenny Sewage Treatment Works which is of insufficient capacity. The scheme to upgrade the Waste Water Treatment Work's (WWTW's) is planned to commence construction in 2009. In the event that construction is delayed the implementation of the plan will have negative affects on estuary water quality due to deficiencies in WWTW's to accommodated the scale of growth provided for in the plan.

Material assets and cultural heritage:

There are 18 Recorded Monuments within the plan area and 19 buildings on the Record of Protected Structures. The plan sets out a clear framework to protect these features in a balanced manner so as to have significant likely positive effects on material assets and cultural heritage.

Landscape:

The plan area consists of a substantial amount of undeveloped lands that contribute to the landscape setting of the town. The plan aim is to promote a balance between landscape and the development of a Gateway City by guiding development in a manner so as to respond to context, topography and setting and to deliver quality, therein mitigating against negative impacts.

2.0 Introduction

This document forms part of the Letterkenny Environs Development Plan 2009-2015 and fulfils the Councils responsibilities in relation to the preparation of a Strategic Environmental Assessment (herein described as SEA) in accordance with the Planning & Development (Strategic Environmental Assessment) Regulations 2004.

2.1 Purpose

The purpose of the process of Strategic Environmental Assessment is to carry out a systematic evaluation of the likely significant impacts on the environment of implementing a plan or programme. The process involves the preparation of an Environmental Report to identify and evaluate the likely significant environmental effects of the plan/programme, to consult the public and the environmental authorities in relation to the Environmental Report, to take account of the findings of the report in deciding whether to adopt or modify the plan and to make the decision on adoption of the plan and to set out how SEA influenced the outcome.

The SEA process is intended to ensure the integration of the plan making process with the consideration of the likely significant environmental impacts of a plan and provide for this consideration on a cumulative basis. In doing so, the SEA process adds value to the plan making process and should be viewed as a positive measure that shall ensure the systematic consideration of alternatives together with the identification of mitigation and monitoring measures.

In simple terms though, the SEA process means that in making the plan, important environmental matters that require special types of planning considerations are sieved out. As a result, special and identifiable attention is given in the plan making process to these environmental issues. It also means that environmental issues are examined on a cumulative basis as opposed to at a local site level only (for example through consideration of a planning application and associated EIS). This means that the SEA process brings environmental considerations strongly

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into planning at the highest level in the decision making process and therefore the benefits should flow down through to a local level through local area plans or through planning applications. In other words, the aim is to consider environmental impacts in tandem with the making of the development plan so as to try to 'get it right' from the top down.

2.2 Legislative Background

The Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) gave effect to the SEA Directive 2001(2001/42/EC) so as to integrate SEA into current plan making procedures. As a result, SEA is required in respect of development plans, variations to development plans and local area plans likely to give rise to significant environmental effects.

2.3 Steps taken and the Strategic Environmental Assessment requirement

On 20th September 2007, Letterkenny Town Council and Donegal County Council jointly published notice to commence the review of the Letterkenny & Environs Development Plan 2003-2009 (as varied) to result in the preparation of a new plan entitled Letterkenny & Environs Development Plan 2009-2015.

Having regard to the population of the plan area as greater than 10,000 persons, the preparation of a Strategic Environmental Assessment is a mandatory requirement (Planning & Development (Strategic Environmental Assessment Regulations) 2004 refer).

As a consequence, a scoping exercise was carried out so as to ensure that the relevant environmental issues are identified and that these issues be addressed within the environmental report. The scoping report was issued to the prescribed Environmental Authorities for consultation resulting in submissions from (a) The Department of the Environment, Heritage & Local Government providing comments in relation to architectural heritage and (b) the Department of Communications, Marine & Natural Resources advising that the Department had no further comment at this time.

A final scoping report was subsequently prepared on foot of the consultation with the prescribed Environmental Authorities. This report brought together the preliminary scoping exercise and the consultation with the prescribed Environmental Authorities so as to ensure the relevant environmental issues are identified in order that they can be addressed appropriately in the environmental report. As a result, the emerging environmental issues forming the scope of the environmental report were identified as:

- Biodiversity, flora & Fauna: Impact on landscape (valley sides, the estuary, elevated/ visually sensitive area, designated green areas, Greenfield lands) and the biodiversity network (River Corridor, Kiltroy Woods, Ballymacool Woods).
- Population and human health: The need to create a safe, healthy and high quality environment to live in, to work in and to visit concentrating on quality of life.
- Soil, water, & air/climatic factors: Impact of proposed zoning in relation to climate change, sustainability agenda, flood risk, transport and air quality. The ongoing threat to water quality due to release of pollutants and restricted capacity of WWTWs.
- Material assets and cultural heritage/architecture and archaeology: Reconciliation of development with national monuments, protected structures, important landscapes, water bodies, important views and prospects.

3.0 Methodology

3.1 General

The methodology used follows the requirements of the SEA Directive and the Department of Environment, Heritage, & Local Government 'Implementation of SEA Directive (2001/42/ EC): Assessment of the Effects of Certain Plans and Programmes on the Environment, Guidelines for Regional Authorities and Planning Authorities' November 2004. Annex 1 of the Directive details the information to be included in the environmental report, summarised as follows:

- An outline of the contents, main objectives of the plan and its relationship with other relevant plans/programmes.
- A description of the relevant aspects of the current state of the environment and the likely evolution of the environment without implementation of the plan.
- A description of the environmental characteristics of areas likely to be significantly affected.
- Identification of any existing environmental problems, which are relevant to the plan particularly, those relating to any European protected sites.
- A list of environmental protection objectives, established at international, EU or national level, which are relevant to the plan and describe how those objectives and any environmental considerations have been taken into account when preparing the plan.
- A description of the likely significant effects on the environment including on matters such as biodiversity, population, human health, fauna, flora soil, water, air, climate factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape.
- A description of the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse environmental effects of implementing the plan.

- An outline of the reasons for selection of alternatives considered and a description of how the assessment was undertaken (including any difficulties).
- A description of monitoring measures.
- Non-technical summary of the above information.

3.2 Additional Studies Commissioned

In order to inform the preparation of the plan and the Environmental Report, Letterkenny Town Council and Donegal County Council engaged Glás Enviro Teo, Environmental Consultancy to prepare a Biodiversity Report in relation to the study area

3.3 Consideration of Alternatives

In accordance with Article 5 of the SEA Directive, 3 alternatives have been considered in this process as follows:

- a. Continuation of existing policy framework.
- b. Planning for neighbourhoods.
- c. Sustainable development of the Gateway.

Each alternative is considered in greater detail at section 7.0 of this environmental report. As a result, alternative 3 is the preferred option.

4.0 Contents, main objectives of the plan and its relationship with other relevant plans and programmes

4.1 Background

Letterkenny Town Council and Donegal County Council are preparing this plan jointly under the provisions of the Planning & Development Acts 2000-2006, Part II, Chapter 1. On adoption, this plan shall be the statutory development plan for the area of Letterkenny and its environs (as defined in the plan) for the period 2009-2015. The geographic area that is covered by the plan comprises some 2,600 hectares/ 6426 acres. The town is situated on the River Swilly valley slopes and the River Swilly traverses through the plan area west- east. Significant areas of established woodland are located at Kiltroy, Gortlee and Ballymacool and undeveloped lands have retained substantial levels of biodiversity and traditional rural form.

4.2 Contents and main objectives of the plan

The main objectives of the Letterkenny & Environs Development Plan 2009- 2015 are set out at Volume 1: Core Document, Part A, Section 2.0 and are described as 'strategic objectives'. The strategic objectives are as follows:

1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.
2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.
4. To consolidate the town centre and promote the area as a quality urban environment through the establishment of design quality and

public realm, improvement of permeability and access throughout, management of pedestrian and vehicular traffic, promotion of alternative modes of transport and enhancement of the architectural heritage of the town centre.

5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

The scale, type and location of development envisaged during the life of the plan is such that the spatial distribution of lands for immediate uptake for various uses are located closer to the core of the town so as to provide for consolidation of land use activity and integration of neighbourhood form. Lands located on the fringe of the town are identified for longer term strategic residential uses and these would not be anticipated as being appropriate for development in the short to medium term unless there is a clear evidenced led justification for their development. In addition, development will be concentrated away from or managed within, lands of environmental importance in terms of landscape value, important views, biodiversity value. Development within the flood risk area will be managed and will be required to ensure appropriate measures are taken so as to minimise the effects of flooding as a result of new development. General employment uses are concentrated in the east of the town around the areas of Bonagee, through to Carnamuggagh Lower. The town centre area is to be consolidated with the prioritisation of infill development and merging of the traditional Main Street area with the newly developing area to the east. Community, education, and open space activity will take place within the existing and newly emerging neighbourhoods of the plan area at locations where gaps are identified or future need will arise.

The type of development that is anticipated is that there will be a concentration of quality new development using design form and layout that contributes to the delivery of integrated sustainable neighbourhoods.

As a result, new development will provide for the creation of places with a strong sense of character and which are positive places for people to live and work in.

The amount of land supply provided results in:

Land Use Zone	Area in Hectares	% of total
Established Development	759	24.38
Strategic Community Opportunity	27	00.87
Town Centre	163	5.24
Primarily Residential	343	11.02
Strategic Residential Reserve	313	10.05
General Employment	143	4.59
Commercial	31	1.00
Opportunity Sites	99	3.18
Education	51	1.64
Open Space	234	7.52
Local Environment	240	7.71
Services	665	21.36
Education Opportunity Site	12	0.39
Low Density Residential	33	1.05

4.3 Relationship with other relevant plans and programmes

This plan is prepared within a framework of existing plans and programmes. The relationship of this plan to others is considered below:

- **National Spatial Strategy (2002)**

The National Spatial Strategy (NSS) was launched by Government in November 2002 and sets out a strategic vision for the spatial development of Ireland over a 20-year period. The key aim of the NSS is to achieve regional balance in terms of physical, social and economic development. As a means of achieving this aim, the strategy identifies a tiered national settlement structure designed to promote adequate opportunities for each region to develop to its full potential.

Within this settlement structure, Letterkenny has been identified as a linked Gateway with Derry, a high priority development corridor of national, regional, local and cross-border economic importance. It is envisaged that

it will be within this corridor where future growth and investment will be promoted and primarily channelled, with the advantages and spin offs filtering to positively impact on all areas of the county. It is considered that the role of Letterkenny, in tandem with Derry as a linked Gateway, is to the forefront of this development plan.

- **Architectural Heritage Protection, Guidelines for Planning Authorities (2004)**

In line with the requirements of the Planning and Development Act 2000, these Guidelines aim to assist local authorities in the adoption of suitable policies for protecting architectural heritage in their development plans and to ensure that they have practical effect through development control measures. It also offers guidance to Planning Authorities on determining planning applications in relation to protected structures or the exterior of a building within an Architectural Conservation Area.

The protection of Letterkenny's listed buildings and Architectural Conservation Areas plays an integral part of the Letterkenny and Environs Development Plan together with other policies in respect of the wider built heritage of the town. The Plan is considered to be consistent with these Guidelines.

- **National Biodiversity Plan (2002)**

In response to the requirements set out in Article 6 of the EU Convention on Biodiversity, the Department of Arts, Heritage, Gaeltacht and the Islands adopted the National Biodiversity Plan in 2002. The overall goal of the Plan is to "secure the conservation, including where possible the enhancement, and sustainable use of biological diversity in Ireland and to contribute to conservation and sustainable use of bio-diversity globally". As a means of achieving its goals, the Plan sets out 91 actions designed to ensure the protection and sustenance of Ireland's biodiversity and its habitats.

The principles of the National Biodiversity Plan are inherent in this review of the Letterkenny and Environs Development Plan, particularly with regard to the preparation of a Biodiversity Study to inform the plan making process.

- **National Climate Change Strategy (2000)**

Based on the principles of sustainability, as set out in 'Sustainable Development-A Strategy for Ireland 1997', the NCC Strategy aims to reduce Ireland's greenhouse gases to 13% above 1990 levels, as required under an agreement made by the United Nations Framework Convention on Climate Change in 1997.

Whilst recognizing the need to support Ireland's economic growth and competitiveness, this strategy provides a framework for reducing our greenhouse emissions through the use of economic instruments (including taxation and emissions trading) and a broad range of policies and measures tailored specifically to relevant sectors. In relation to the built environment and residential sector specifically, measures include improved spatial and energy use planning with reference to residential density guidelines. In relation to the transport sector, the key measures of the strategy include increased use of public transport. The Letterkenny and Environs Development Plan embraces the principles set out in this strategy in the policy presented or identifies future imminent programmes of work that will further achieve consistency with these principles.

- **National Development Plan 2007- 2013**

The key role of the National Development Plan is to manage the investment of funds in plans and programmes in a way that supports the key strategic objectives of the National Spatial Strategy. The current NDP represents the most ambitious funding programme ever proposed for Ireland and proposes the investment of some €184 billion in five investment priorities of (1) economic infrastructure (2) enterprise, science and innovation (3) human capital (4) social infrastructure and (5) social inclusion.

The NDP 2007- 2013 sets out a Regional Development Strategy that is based on the framework of the 2002 NSS. This involves promotion of investment in the nine gateway centres referred to in the NSS, including Letterkenny - Derry, complemented by development of the NSS Hub and County towns and their rural hinterlands. The Letterkenny and Environs Development Plan is considered to be consistent with the National Development Plan 2007-2013.

- **National Heritage Plan (2002)**

The Department of Arts, Heritage, Gaeltacht and the Islands published the National Heritage Plan in April 2002. A key concept of this plan is to "place the protection and enjoyment of heritage at the heart of public life". The Plan, therefore, aims to set out a clear and coherent strategy and framework for the protection and enhancement of our heritage, based on the principles of sustainability. It is considered that the Letterkenny and Environs Development Plan is consistent with the principles of the National Heritage Plan 2002.

- **Sustainable Development: A Strategy for Ireland (1997)**

To illustrate its commitment to the principles of sustainability, the Irish Government adopted "Sustainable Development - A Strategy for Ireland" in 1997. The strategy provides an analysis and framework to integrate and prioritise sustainable development into every sector of Irish life. The overall aim of the strategy is, 'to ensure that economy and society in Ireland can develop to their full potential within a well protected environment, without compromising the quality of that environment, and with responsibility towards present and future generations and the wider international community.'

As such, the Strategy highlights the need for Planning Authorities to take a strategic view of settlement patterns, development requirements and infrastructure needs in their Development Plans to avoid excessive suburbanisation, which is considered to be inefficient in the use of land, energy and transport. It states that Government funding for infrastructural development will not be forthcoming in the event of excessive and unnecessary land zoning in Development Plans. The principles of sustainability, particularly in relation to zoning of the land are integral in this development plan.

- **Towards Sustainable Local Communities: Guidelines on Local Agenda 21 (2001)**

Local Agenda 21 was established as the result of the Earth Summit in Rio de Janeiro in 1992. This document is an agreement for meeting the challenges of the environment and development into the next century. At a national level the government is, as a result of signing the document, committed to ensuring that the relationship between socio-economic growth and the environment is not negative. In effect, this implies that

development should not exceed the carrying capacity of its local environment. Local Agenda 21 also encourages consultative processes which involve the whole community, its local elected members and other community and representative groups through means of information awareness, public consultation and feedback, partnerships between authorities, businesses and communities, and a continuous monitoring of progress towards sustainability. The principles of Agenda 21 are being met through the process of Strategic Environmental Assessment and through the ongoing implementation commitments of this plan.

- **Border Regional Planning Guidelines**

The Border Regional Planning Guidelines, published in 2004, are designed to ensure the future socio-economic prosperity and competitiveness of the Border region. The guidelines build on the settlement structure set out in the National Spatial Strategy, identifying and recognising the importance of the Letterkenny-Derry linked Gateway and its role in energising the North West of the region as a whole. The future prosperity of the Gateway and its hinterlands is central to the Letterkenny and Environs Development Plan.

- **County Donegal Development Plan 2006-2012**

The County Donegal Development Plan 2006-2012 sets out the county settlement strategy for County Donegal. In doing so the County Donegal Development Plan 2006-2012 identifies Letterkenny as a linked Gateway with Derry in line with the NSS and Border Regional Planning Guidelines together the identification of the economic corridor linking the 2 settlements. It is considered that this plan supports and is consistent with the spatial strategy of the County Development Plan 2006-2012 in that the objectives of this plan aim to complement and support the linked Gateway status.

The plans and programmes described above have been considered in the preparation of the development plan and have been integral in terms of the establishment of strategic objectives for Letterkenny and its Environs.

5.0 The State of the Environment

This section sets out the current state of the environment and forms the record of the baseline environmental information relating to the plan area and how the environment would be expected to change without the implementation of the development plan. In addition, this section gives a description of the environmental characteristics that are likely to be significantly affected by the plan and identifies any existing environmental problems in the area.

5.1 Description of relevant aspects of the current state of the environment and the evolution of that environment without the implementation of the plan.

5.1.1 Population and Human Health

The population of the Letterkenny and Environs Development Plan area in 2006 is 19,363 persons representing a high percentage growth since 2002 at a rate of 21.6%. Letterkenny also has a higher than average in-migration level.

In the year 2005-2006, 2,564 people moved into Letterkenny from the County, Country and abroad. A total of 4229 people within the Letterkenny Plan area were born outside of Ireland (CSO 2006). Of these, 2439 people were born in the UK, 279 in Poland, 34 in Lithuania, 285 in the EU 25 and 1192 born in 'the rest of world'. The population of Letterkenny is projected to grow to between 36,000- 39,000 by 2020. The supply of land to meet the projected population will be catered for by lands zoned 'residential' that are neither developed nor have planning permission granted thereon. This supply of land totals 307ha while the land mass required to meet the need is approximately 106ha, therefore providing an excess of 'residential' zoned lands in the region of 201ha.

The perceived health of those living in Letterkenny can be represented through a number of the indicators that are used to describe the state of the environment at other parts of this section such as, air quality, water quality, levels of other pollutants, occurrence and quality of Material Assets & Cultural Heritage - Architecture and Archaeology. Other 'quality of life' indicators are identifiable through the neighbourhood analysis at Volume 1,

Part B of the plan which shows the existing spatial distribution of open space, childcare facilities, education, neighbourhood centres as examples.

The provision of community facilities, amenities and infrastructure (quality of life indicators) to support new developments within and surrounding the town centre has been slower and has struggled to keep up with the pace at which development is happening. There is a necessity to provide for the proper residential and associated infrastructural development on the basis of the key neighbourhood growth nodes so as to maximise investment and gain the greatest human health benefit in a spatial context.

POPULATION & HUMAN HEALTH NON-IMPLEMENTATION OF THE PLAN

Non implementation of the plan would likely result in a lack of coordination in terms of focusing attainable levels of development into specific areas, thereby aiding the creation of critical mass as well as creating well planned places to live and work. Non implementation of the plan would likely result in a continuation of current issues such as the prohibitive cost of securing land in the neighbourhood areas for community facilities and amenities thus preventing community gain.

Human health would also be likely to be affected through contact with potentially polluted river and streams within the catchment which could be mitigated against with various types of environmental controls.

5.1.2 Biodiversity

As part of the preparation of the Letterkenny and Environs Development Plan, Letterkenny Town Council and Donegal County Council commissioned Glás Enviros Teo, Environmental Consultancy to prepare a biodiversity study for the area of the plan. The baseline information identified through the biodiversity study is as follows:

- **European protected sites**

There are four European protected sites within the plan area, the details of which are set out in the table below.

Type, Site Code, Name and Site Synopsis

Lough Swilly - Special Protection Area

Site Code: 004075

Site Synopsis:

This site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly, a long inlet of the sea that cuts through a variety of metamorphic rocks on the west side of the Inishowen Peninsula. The Lough Swilly SPA extends from just below Letterkenny north to Rathmullan and, except in the area between Farsetmore and Blanket Nook on the southern side of Lough Swilly, the site is bounded by the High Water Mark; its seaward boundary is the Low Water Mark.

Between Farsetmore and Blanket Nook a series of improved pasture and arable fields of importance to geese and swans are included. The site includes sections of the estuaries of the River Swilly, the River Leannan and the Isle Burn and the predominant habitat is a series of extensive sand and mud flats which are exposed at low tide - both estuaries and sand/mud flats are listed on Annex I of the E.U. Habitats Directive. Other habitats represented on the site are salt marshes, lakes which are lagoonal in character (at Blanket Nook), rivers and streams, sand and shingle beaches, lowland wet, dry and improved grasslands, arable land, drainage ditches, reedbeds and scrub. The adjacent Inch Lough and Levels are included in a separate SPA.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallowwaters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted

Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit (a species that is listed on Annex I of the E.U. Birds Directive) and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe, both Birds Directive Annex I species. Golden Plover, a species that is listed on Annex I of the E.U. Birds Directive, used the site regularly during winter (4 year mean of winter maximum 1994/95-1997/98 was 1,001 individuals).

Lough Swilly supports internationally important numbers of Greenland White-fronted Geese (5 year mean of winter maximum 1995/96-1999/00 for the Lough Swilly flock was 970 individuals), Whooper Swans (5 year mean of winter maximum 1995/96- 1999/00 was 1,135 individuals, the largest population in the country) and Greylag Geese (5 year mean of winter maximum 1995/96-1999/900 was 2,020 individuals - this figure includes both migratory birds of the Icelandic population as well as an estimated 750-1,000 feral birds). The numbers of Greylag Geese using the site has continued to increase in recent years. The main areas of the site used by these species are at Big Isle, Farsetmore, Blanket Nook and Ballylawn. The Inch Levels are used by the same flocks of geese and swans - this area is included in a separate Special Protection Area. Both Greenland White-fronted Goose and Whooper Swan are listed on Annex I of the E.U. Birds Directive.

This site is major ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance and 3 species occurring within the site in numbers of international importance. The site is regularly used by in excess of 20,000 waterfowl and thus qualifies as of international importance. The site is used by several species that are listed on Annex I of the E.U. Birds Directive.

26.2.2002

Lough Swilly - Special Area Conservation

Site Code: 00166

Site Synopsis:

This large site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly. It extends from below Letterkenny to just north of Buncrana. Lough Swilly is a long sea-lough, cutting through a variety of metamorphic rocks on the west side of Inishowen.

The site is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site are the Swilly, Lennan and Crana. At low tide, extensive sand and mud flats are exposed, especially at the mouths of the Swilly and Lennan rivers. Bivalves and polychaete worms are well represented in the macro-invertebrate fauna, with species such as Cockles (*Cerastoderma edule*), Mussels (*Mytilus edulis*), Baltic Tellin (*Macoma balthica*), Ragworm (*Nereis diversicolor*) and Sand Mason (*Lanice conchilega*) being common. Cord-grass (*Spartina anglica*) is well established on parts of the intertidal flats. The shoreline above the flats varies from bedrock shore to shingle or cobbles, and here is found a scattering of salt tolerant plants such as Scurvygrass (*Cochlearia officinalis*), Sea Milkwort (*Glaux maritima*) and Red Fescue (*Festuca rubra*).

Salt marshes are well represented in the inner sheltered areas of the site, with good examples in the Ramelton area. The marshes are the Atlantic salt meadow type, and are characterised by such species as Thrift (*Armeria maritima*), Sea Milkwort (*Glaux maritima*), Sea Aster (*Aster tripolium*), Sea Arrowgrass (*Triglochin maritima*) and Red Fescue (*Festuca rubra*).

Lakes, which are lagoonal in character, occur at Inch and Blanket Nook. Inch Lough is a good example of a large, shallow lagoon with very low salinity in most of the lagoon. Less information is available for Blanket Nook but it is of a higher salinity and adds to the richness of the habitat within the site as a whole. The vegetation in Inch is diverse and typically lagoonal, with well developed charophyte communities, including a large population of *Chara canescens* (a Red Data Book species). It also supports Horned Pondweed (*Zannichellia palustris*) and a mixed Pondweed/Tassleweed Community (*Potamogeton pectinatus*/Ruppia

maritima). The green alga *Chaetomorpha linum* occurs at Blanket Nook. The aquatic fauna at Inch is rich and diverse and includes a range of lagoonal specialists and species that are apparently rare. These include *Lekanesphaera hookeri*, *Palaemonetes varians*, *Conopeum seurati*, *Sigara stagnalis*, *S. concinna*, *Jaera nordmanni*, *Neomysis integer* and *Cordyllophora caspia*. Less information is available on the aquatic fauna at Blanket Nook, though several lagoonal specialists have been recorded, including *Jaera ischiosetosa*, which appears to be a rare species in Ireland. Inch Lough is regarded as of significant conservation value for ectonotal Coleoptera, with several species indicative of well-developed shoreline habitats including two that are apparently rare: *Bembidion bipunctatum*, a halotolerant shore species, and *Bembidion aeneum*, a stenotopic halobiont species. Although artificial in origin, the lagoon habitat in this site is one of the largest and best examples of a shallow, low salinity lagoon habitat in the country.

Two woodlands occur adjacent to the north-western shore of Lough Swilly. These are Rathmullen and Carradoan Woods, the former being a Nature Reserve. They are dominated by Sessile Oak (*Quercus petraea*) and Birch (*Betula pubescens*), but many other species are present including exotics such as Beech (*Fagus sylvatica*). Alder (*Alnus glutinosa*) and Willows (*Salix* spp.) occur in the wetter parts. An area of wet heath, dominated by Ling (*Calluna vulgaris*), occurs on the hill above Carradoran Wood. These woodlands display a generally intact structure and support a range of breeding birds, including Woodcock.

A further area of woodland, scrub and heath occurs above the north-east shore at Crockacashel and at Porthaw. Oak/Hazel (*Corylus avellana*) scrub is frequent, and there is a well developed ground flora with species such as Wood-sorrel (*Oxalis acetosella*), Herb Robert (*Geranium robertianum*), Lady's fern (*Athyrium filix-femina*) and Broad Buckler Fern (*Dryopteris dilatata*). The heath vegetation includes Ling (*Calluna vulgaris*), Common Gorse (*Ulex europaeus*), Wood Sage (*Teucrium scorodonia*) and Tormentil (*Potentilla erecta*). In the wetter areas, Purple Moor-grass (*Molinia caerulea*) and Cross-leaved Heath (*Erica tetralix*) occur.

The site supports a population of Otter, a species listed on Annex II of the EU Habitats Directive.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallow waters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe.

The adjacent pasture and arable polders at Inch, Big Isle and Blanket Nook support internationally important populations of Whooper Swans, Greenland White-fronted Geese and Greylag Geese. Inch Lough is an important roosting area for these birds and at times they utilise other parts of Lough Swilly for roosting.

This site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows, old oak woods) and supports a population of Otter. In addition, it is of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance, plus 3 species occurring within the site and on adjacent polders in numbers of international importance.

14.03.2003

Lough Swilly, Big Isle, Blanket Nook, Inch Lake - Natural Heritage Area
Site code: 00166

Site Synopsis: Same as site synopsis for Lough Swilly SAC (002287) above.

River Swilly Valley Woods - Natural Heritage Area

Site code: 002011

Site Synopsis:

The River Swilly Valley Woods NHA consists of ten separate fragments of woodland one to the North East of Letterkenny in County Donegal, the other nine in the Valley to the west of the town.

Woodland has been planted in this area in the past, but more natural cover has developed also, so that the trees present today are a mixture of natives and exotics. Major native trees are the Hazel (*Corylus avellana*), Ash (*Fraxinus excelsior*) and Oak (*Quercus robur*) in drier parts, with Alder (*Alnus glutinosa*), Willow (*Salix* sp.) but especially Birch (*Betula* sp.) in the wetter areas. Exotic trees include Beech (*Fagus sylvatica*) and Sycamore (*Acer pseudoplatanus*). A range of age structures occurs across the site, so that some spaces are of a scrubby nature - Gorse (*Ulex europaeus*) and Bracken (*Pteridium aquilinum*) are frequent in more of these parts.

On the ground, woodland species such as Foxglove (*Digitalis purpurea*), Wood Sorrell (*Oxalis acetosella*), ferns such as Hardfern (*Blechnum spicant*) and various mosses and lichens occur.

Further habitat diversity is provided by a number of heathy areas with Heather (*Calluna vulgaris*), Purple Moor-grass (*Molinia caerulea*), Bog Asphodel (*Narthecium ossifragum*) and Common Cotton grass (*Eriophorum angustifolium*) among the parts to be found there. Rocky streamside ravines provide another habitat as do wet grassland and sites of former hazel coppice.

Some parts of the site are threatened by overgrazing by domestic stock, while other parts are suffering from ingorous growth of *Rhododendron*. These two threats lower the interest of what is otherwise a valuable refuge in the area for flora and fauna.

12.07.1995.

• **General biodiversity within the plan area:**

The general biodiversity of the plan area is captured on the habitats mapping (Map 1 at the rear of this report) prepared by Glás Enviro Teo. The assessment in general terms shows a range of habitat types including mixed semi- natural woodland, dry heath, unimproved grassland, bare ground, dense continuous shrub and improved grassland as examples. The general habitats character can be segregated into the following general sectors together with an indication of the quality of biodiversity:

Sector	Description	Level of biodiversity
Urban core; Main Street and area around St. Eunan's Cathedral	Main Street 2.5km in length located on a hill with extensive landscape view of Glenswilly. Main Street consisting of retail, commercial and residential properties. Main Street generally retains its traditional townscape character. Tree planting at Market Square provides niche habitat for passerine birds. Older buildings provide a nesting habitat for house martins, swallows and swifts during the summer period. Urban Feral pigeon found to be rare therefore reducing avian competition for passerine birds. Area around St Eunan's Cathedral retains original rock outcrop and upland shrub character with gorse shrub and native trees retained.	Low to moderate biodiversity.
Retail and commercial estates	Sylvian culture (tree and shrub) landscaping of	Low to moderate biodiversity.

Sector	Description	Level of biodiversity
	marginal areas surrounding buildings and car parking. Apparent increasing local biodiversity of urban marginal areas.	
Residential estates	Older residential estates close to Main Street consist of mature and semi- mature gardens providing niche habitat for small passerine birds. Most recently constructed estates are found to be less diverse with small areas of grass lawns and limited shrub or tree planting. Some retention of traditional hedgerow and linear tree boundaries apparent within estate landscape.	Low to moderate biodiversity.
Agricultural land	(Much of Strategic Residential Reserve, Local Environment) Agricultural lands from pasture fields with linear hedgerow boundaries and tree lines to small areas of tillage fields. Retains agricultural identify of mixed farming. Filed systems enclosed by hedgerows and linear tree lines.	Moderate-high biodiversity (Semi-improved pasture and hedgerow environments). Low to moderate biodiversity (Areas of tillage and improved pasture fields)

• **Special areas of biodiversity within the plan area:**

3 areas of special biodiversity habitats have been identified for more specific consideration within the plan area. Each special area is set out below:

- a) Ballymacool Woods, Whinney Hill, Rodgers Burn, Drum Hill:
Whinney Hill is an upland meadow grassland habitat with a high percentage of gorse shrub and consisting of a steep gradient. The area is moderately diverse in its ecological diversity and retains the old traditional field boundaries and trees. Drum Hill is the site of a Mass Rock. Rodgers Burn is a fast flowing mountain stream that rises in the upland of Ballymacool and enters the River Swilly close to the GAA playing fields on the banks of the Swilly. The area of Ballymacool once held a small area of oak woodland which has been partially felled at the Ballymacool estate and the existing woodland is a designated NHA. A new town park is currently under development. The park retains the old hedgerow boundary and standalone trees as part of the featured town landscape. The area consists of linear hedge, tree line, dry humid acid grassland, scrub, semi improved grassland, hedgerow with trees, scattered shrub, mesotrophic running water. Dominant site habitat is semi- improved pasture fields enclosed to the traditional stone ditch and hedgerow boundaries with scattered trees. Floristic biodiversity of the local plant communities was found to be moderate. Himalayan Balsam found growing along Rodgers Burn but not established within the stream. Primrose and violets blooming along the stream banks in early summer 2008. Nettle and bramble frequent close to the embankments. Small woodland passerine birds found to be abundant within the area close to the stream.
- b) Kilty Woods
Kilty Woods is semi natural woodland located at the East northeast boundary of Letterkenny. The woods tree structure is of local provenance. The tree canopy is loose knit allowing sunlight to filter through to the woodland floor providing a sound under canopy growth of shrub and ground flora. Birch found to be the dominant tree species with Willow, Elder, Blackthorn, Hawthorn, Alder and Oak frequent. The woodlands were managed by coppicing in the past, a traditional woodland management that has declined over the past twenty years. The woodland area is high in biodiversity providing an important habitat for small passerine bird species within an urban environment. The woodlands also provide habitat for small animals such as rabbit, stoat, badger and possibly squirrel. Consists of linear hedge, tree line and dry meadow.

c) River Swilly

River consists of dyke/pollard Dutch engineered system as rail embankment and flood defence system within the area of the Swilly alluvial plain. The dyke and pollard system were introduced in the circa of the 18th century with the introduction of the Donegal railway and traditionally provided three distinct roles namely (a) A rampart for the railway tract along the river embankment (b) A flood plain defence system and (c) Wet meadow management system for early grass production. The river section is slightly polluted in places with potential alterations to the aquatic environment with a detrimental affect. Himalayan Balsam was found to be a dominant occurring river bank flora. Competition of native flora species is undermined by Himalayan balsam due to its rapid spread and ability to become established. Japanese Knot Weed was also identified growing along the river embankment which is a non- native species which grows profusely once established, eradicating local indigenous flora. Broken into three sections of River, the following additional information is relevant:

i. River Swilly West Conwal to Dunnes Stores

Geology is Termon Formation Pelites. Dominant site habitat is semi improved pasture fields enclosed to the east and west by engineered earth banks (dykes). The adjoining fields have been designed to utilize the spring flood water to increase early grass growth in the area of wet meadow land. Floristically, biodiversity of the local plant communities was found to be low. The fields were found to be small enclosed by tree and hedgerow dyke. Himalayan Balsam, Nettle and bramble shrub were found to be dominant on embankments. Small woodland passerine birds were found to be abundant. Large area of improved grassland with access from north along the R250 road.

ii. Dunnes Stores to Ballyraine:

Geology is Termon Formation. The section is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. The dyke systems were created and designed during the Londonderry and Lough Swilly (LD&LS) railway construction period of mid 18th century. The engineering land management of the alluvial coastal plain has allowed the extensive use as prime arable lands for growing barley and oat crop. The section at present is used as development land, and infilled to raise the ground level. Dyke system

is mostly intact. Plant species diversity was found to be generally very low, increasing along the existing dyke bank. Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Rabbit seen frequently.

iii. Ballyraine/Port/Bonagee:

Geology is Lough Foyle Succession Schist and grit with thin marble units. The section is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. Extensive use as prime arable lands for growing barley and oat crop. The section at present is used as cattle pasture. Plant species diversity was found to be generally low, increasing along the hedgerow ditches. Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Bird species noted during the field survey was a flock of 6 *Oenanthe* Wheatears within open hill area, a flock of 30 *Sturnus vulgaris* (Starlings) flying between the stands of hazel and hawthorn scrub. 10 of hooded crow *Corvus corone cornix* were sighted flying above the lowland pasture fields to the north of the site. Numerous woodland birds were observed within the stands of woodland scrub; *Fringilla coelebs* (Chaffinch), *Phylloscopus trochilus* (Willow Warbler), *Motacilla alba ssp. Yarelli.*(wagtail), *Erithacus rubecula* (Robin), *Prunella modularis* (Dunnock), *Turdus merula* (Black bird) *Certhia familiaris* Tree creeper, *Phyrrhula phyrrhula* (Bull finch) and a small flock of 7 *Anthus pratensis* (meadow pipit). Likely habitat for badger, fox and rabbit. Otter was not observed during site visits.

BIODIVERSITY
NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will result in reduced protection for important habitats and areas of special biodiversity. The planning framework of the development plan aims to strengthen the protection in particular in relation to European designated sites and in relation to the form of development permissible within 'Local Environment areas.'

Furthermore, the plan provides the environment for the balanced and measured approach to the development of an urban area set against the need to protect natural habitats. In doing so the plan advocates the

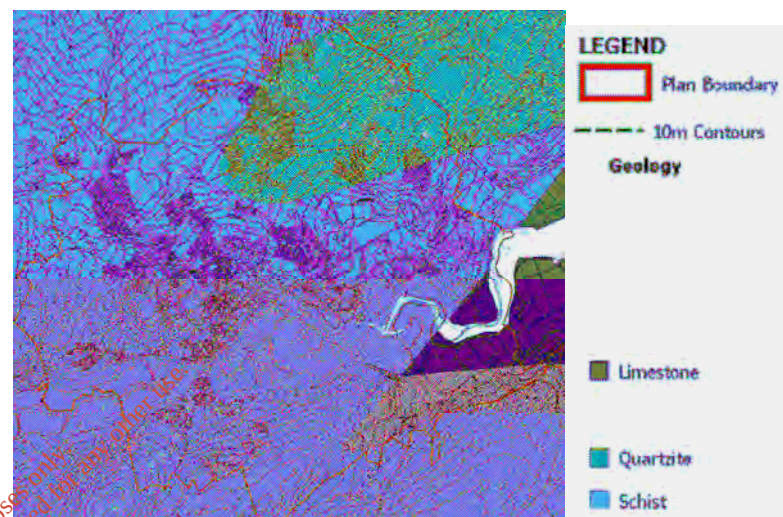
coordination of important natural habitat areas (where appropriate) within the urban form so as to contribute to the delivery of a quality urban environment and added opportunities for the public to utilise and benefit from the surrounding natural environment. Non- implementation of the plan would dilute this ethos and therefore have resultant negative effects on population and human health as there will be reduced retention of natural habitat area, reduced access to natural habitat areas and reduced opportunities for the development of quality urban areas.

5.3.1 Geology/Soil

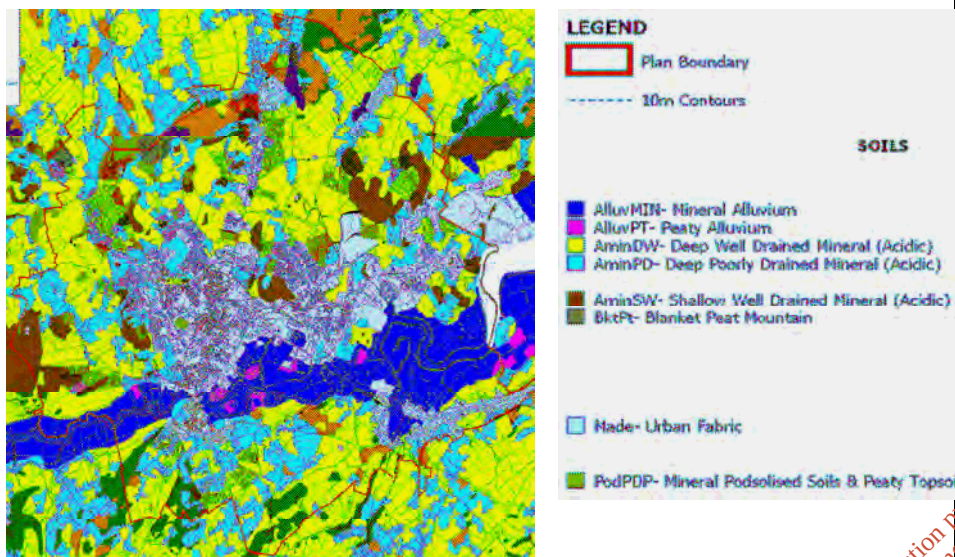
The underlying geology of the area falling within the plan boundary was for the most part formed during the Precambrian Era and comprises 3 rock types, as follows:

- Termon Formation (Schist) - This rock type dominates the plan area
- Lower Crana Quartzite - Comprises 2 areas within the plan area, 1 covering the areas of Carnamuggagh, Lisnennan, Knockybrin and Woodland and another covering the area from Drumnahoagh along the N13 to the plan boundary
- Dungiven Limestone - Comprises a small piece of land to the North of the N13 covering the areas of Bonagee, Glebe and Dromore.

The detail of rock type and location is illustrated on the map below.



Soil types occurring throughout the area range from shallow to moderate depth peaty podzols and established podzolics types with a moderate percentage of loam and sandy clays. Ground in most places appears to be relatively free draining, however there are areas prone to localised water-logging. The detail of soil type and location can be seen on the accompanying map.



GEOLOGY/SOIL

NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will not result in significant changes from the existing affects in relation to geology/soil. However, the long term objectives in relation to the preparation of a flood study will bring positive benefits in terms of ensuring for appropriate mitigating measure sin relation to surface water drainage and flood alleviation so as to protect soils/geology from the affects of flooding.

However, it is noted that non- implementation of the plan will result in a more diluted framework in relation to the protection of trees, hedgerows and natural environments in that there will less emphasis on the protection of these natural features and integration of same within the urban environment. As a result, non-implementation of the plan may result in increased erosion to soils.

5.1.4 Air, Noise and Climate Factors

• Air

The European Commission established an Air Quality Framework Directive in 1996 to assess the level of harmful toxins in the environment. This directive was passed under Irish Law in 1999. Initial research has established that, generally, Ireland has a good level of air quality, mainly due to the eradication of the burning of coal in many urban areas during the 1980s and the early 1990s.

Ireland is divided into four zones (A, B, C & D) for the purposes of assessment and management of air quality as defined in the Air Quality Regulations (2002). Letterkenny currently lies in Zone D - this zone is made up of all parts of the country not included in Zones A, B & C, which list certain cities and larger towns in the country with populations above 15,000. Areas in Zone D are not subject to the continuous monitoring of levels of PM10 or assessment of levels of nitrogen dioxide, sulphur dioxide and benzene.

Despite this, the Environmental Health Department of the Health Service Executive West carried out an assessment of air quality in Letterkenny from 22 November 2006 until 1 March 2007. This was initiated due to the observation of smog by Environmental Health staff over the town at various times during previous winters.

This study produced the following findings:

- None of the limit values for sulphur dioxide or black smoke were exceeded during the measurement period
- Levels of nitrogen dioxide (main source: traffic) would suggest that there is merit in further monitoring.
- Sulphur dioxide concentrations were very low relative to the limit values.
- Five out of the twenty nitrogen dioxide concentrations were not within the annual limit value. Four of these five readings were recorded at a major and busy junctions in the town centre.
- Black smoke levels were within both guide and limit levels. However, this should not give grounds for complacency, as the levels detected

are higher than the maximum levels found in certain parts of Dublin during 2005.

The study recommended that:

- Further monitoring be carried out of various pollutants to determine whether or not a ban in Letterkenny on the sale, marketing and burning of fuels generating smoke should be recommended.
- Statistics be generated regarding respiratory illness in Letterkenny.
- That the HSE recommends to the appropriate bodies that Letterkenny be included within the scope of Zone C under the Air Quality Standards Regulations 2002.

The Environmental Protection Agency (EPA) have established a mobile laboratory in the grounds of Donegal County Museum, High Road, Letterkenny. The project commenced on 16th May 2008 and will continue for an approximate period of six months in order to successfully assess the air quality levels in Letterkenny. During the project, the EPA will assess the levels of Ozone, Carbon Monoxide, Nitrogen Dioxide & Nitrogen Oxides, and Sulphur Dioxide as well as the levels of Particulate Matter (pm)* in the air. In general, levels of Carbon Monoxide, Nitrogen Dioxide & Nitrogen Oxides are increasing due to the increased levels of transportation and vehicles on the roads.

The results for the assessment are displayed on the following table. Due to the level of accessible information, the results are for the most recent period of recording.

Substance	Limit level**	Average recorded level
Sulphur Dioxide	350	0
Nitrogen Dioxide	200	7
Carbon Monoxide	10	0.1
Particular Matter (pm10)	50	11.15

All of the recorded figures are extremely low and therefore the EPA have stated that, at this stage in the research project, the air quality level of Letterkenny is very good.

*Particulate Matter (pm) is derived from a combination of vehicle exhaust emissions, soil & road surfaces, construction works and industrial emissions.

**Sulphur Dioxide, Nitrogen Dioxide & PM 10 are measured in microgrammes per cubic meter, whilst, carbon monoxide is measured in milligrammes per cubic meter.

• Noise

No baseline data exists in relation to noise pollution in Letterkenny. Issues surrounding noise and noise pollution have not been a prominent concern in Letterkenny to date. However, various complaints are made from time to time in relation to noise nuisance in the town, the sources of which range from the construction industry to late night entertainment venues.

• Climate

Climate of Ireland is cool temperate. The weather is changeable and generally enjoys mild weather conditions with little frost during winter months.

AIR, NOISE AND CLIMATIC FACTORS **NON-IMPLEMENTATION OF THE PLAN**

The affects of increasing volumes of traffic by means of increased urbanisation represents the key impact on the air quality of the environment. Non- implementation of the plan will result in the continued fragmented form of urbanisation that has been occurring to date, particularly in the environs area of the plan where a sequential policy void exists, that results in the inefficient increase in car dependency and journeys throughout the plan area. As a result, there would continue to be a link between the increase in car usage and movement and the threat to air quality. The affect of increases in traffic volumes, in particular lorries and buses has a direct link in terms of ongoing noise levels in Letterkenny.

5.1.5 Water

• River Water

The Letterkenny and Environs Development Plan area lies within the River Swilly catchment draining to the Lough Swilly. A Flood Study was carried

out in 2002 (commissioned by the Councils) providing information in relation to the River environment. The River Swilly commences adjacent to the Glendowan Mountains at an elevation of approximately 280mOD Malin. It flows in an easterly direction through Letterkenny and into Lough Swilly. The catchment area including Letterkenny is approximately 119kilometres squared. The catchment is predominantly rural with the only significant urban area at Letterkenny in the downstream end of the catchment. The annual average rainfall for the whole catchment is approximately 1600mm (1200mm in Letterkenny). The River Swilly is tidal throughout Letterkenny and to approximately 2.5km upstream on high spring tides.

Ordnance Survey maps indicate that the land adjacent to the river between Port Bridge and Old Town is marshy and prone to flooding. The OPW Flood maps identify 14 location of flood events recorded in the town. Increasing urbanisation of the catchment is leading to greater flows in the ditches and streams that drain Letterkenny into the River Swilly. At periods of high water levels in the River Swilly this water is unable to enter the river and must be stored in the area directly behind the embankments. Building works and raising of ground levels have reduced the storage capacity of this area. Increasing volumes of surface water runoff and reduced capacity of the storage area will lead to flooding problems. The Flood Study 2002, recommended that all infrastructure below the 5.3m contour should be considered at risk of flooding. The landuse-zoning map accompanying the plan identifies the flood risk area.

River water quality data is sourced from the Environmental Protection Agency indicating a station located at bridge at Newmills, station code 0200. The Q- rating (quality) for 2004 at this location was recorded as 4 showing river water quality at this point to be unpolluted. Recording at station 0250 in relation to the Corravaddy Burn, located at bridge near Bonagee recorded a Q- rating of 2/0 in 2004 indicating river water quality at this point to be seriously polluted.

• Estuary Water

Lough Swilly (SAC) lies to the east of the plan area and is a large estuarine Lough with intertidal sand and mud flat habitats. The trophic status (i.e. increased nutrient loading resulting in eutrophication) of estuarine and coastal water bodies is reported by the EPA. Three relevant

records are available and classification falls into four categories; unpolluted, intermediate, potentially eutrophic and eutrophic. Records show the following for the period 2001- 2005:

- i. Upper Swilly Estuary: Intermediate
- ii. Lower Swilly estuary: Unpolluted
- iii. Lower Lough Swilly: Unpolluted

• Drinking Water

Current water supply in Letterkenny is provided for through abstraction from Lough Salt and Lough Keel of 9MLD. Additional supply in drought years is provided for through abstraction from Lough Reelan. Total safe yield in drought year is 8.45MLD. Demand is at 9MLD and growing. There is minimal operational headroom of 10% and capacity of 10.15MLD.

Having regard to existing water supply capacity, future supply will be provided for through a number of schemes as follows:

- i. Water conservation.
- ii. Boreholes scheme at Ballymacool: To provide 1.8MLD for the short term needs of Letterkenny and to augment existing Lough Salt and Lough Keel sources. Project construction at Euro3.7million involving the construction of boreholes at Ballymacool, water treatment works at Ballymacool and rising main to Ard O'Donnell Reservoir. Quality of the water produced will fully comply with Drinking Water Regulations. . Groundwater to be blended with Lough Salt water to reduce the effect of hardness.
- iii. Lough Greenan Scheme: To provide 1.3MLD for the short terms needs of Letterkenny augmenting existing Lough Salt and Lough Keel sources and to ensure water is abstracted in an environmentally sustainable manner. Scheme involves rising main to Goldrum Reservoir and duplication of Lough Salt Raw Water Main. Lough Greenan water to be blended with Lough Salt and Lough Keel water. Water Treatment Plant upgrade at Goldrum is proposed as a future phase.
- iv. South Letterkenny Water Supply Scheme: To upgrade the water supply south of the River Swilly involving a storage Reservoir at Rahan, trunk and distribution pipelines.

- v. Letterkenny/Lough Mourne Scheme: To provide a total of 25MLD, 10 MLD of this for the medium/long term needs of Letterkenny. Project cost will be Euro84million involving impoundment of Lough Mourne, construction of Water Treatment Works, trunk mains to existing network and to Letterkenny Network at Listillion, new reservoir at Listillion, Trunk Main to reconstructed Knocknamona Reservoir, new networks, pumping stations and reservoirs in the Finn Valley area.

• **Urban Wastewater**

Letterkenny is serviced by the Letterkenny Sewerage Treatment works which is of insufficient capacity to cater for the existing and future populations of Letterkenny. The scheme to upgrade the Waste Water Treatment Works will provide appropriate treatment for Letterkenny to be size of 40,000 PE. Commencement of contract is anticipated during 2009 for Design Build and Operate.

WATER **NON-IMPLEMENTATION OF THE PLAN**

Non- implementation of the plan will result in the continued intermittent discharge of pollutants to the River Swilly and Lough Swilly with resultant impacts on water quality in the Letterkenny and surrounding areas.

Non- implementation of the plan will result in a more sporadic form of urban development which will result in reduced affect of investment in key infrastructure.

5.1.6 Material Assets and Cultural Heritage

- **Archaeology & Historic Reference** - There are 18 Recorded Monuments within the plan area. These monuments have National Monument status and are protected under Section 12 of the National Monuments (Amendment) Act, 1994.

The detail of these is as follows:

Map No. & Register No:	Type	Townland Location
DG053-015	Cashel	Castlebane
DG053-017	Holy well	Lisnennan
DG053-018	Bullaun Stone	Kiltoy
DG053-019	Church	Kiltoy
DG053-022	Cashel	Ballymacool
DG053-02301	Enclosure	Ballymacool
DG053-02302	Souterrain	Ballymacool
DG053-021	Bullaun Stone	Carnamogagh Lower
DG053-024	Enclosure	Ballymacool
DG053-025	Standing Stone	Sallaghgrane
DG053-026	Enclosure	Ballyrairie
DG053-030	Souterrain	Ballymacool
DG053-031	Souterrain	Ballymacool
DG053-032	Standing Stone	Oldtown
DG053-03303	Bullaun Stone	Drumnahoagh
DG053-034	Enclosure	Scribbly

In addition to these there are various other archaeological sites within the plan area, which are not protected under the National Monuments Act, while there may be other unknown archaeological sites. In terms of areas or features of historic reference the plan area comprises the disused railway line some of which is still intact as well as its associated features such as embankments, gates, stiles.

- **Natural Heritage** - Natural heritage falling within the plan area comprises areas and features such as, public amenity spaces, parks, various walkways, wooded areas, hedgerow, urban gardens, and individual tree species.
- **Waterbodies and associated flood protection measures within the river and estuary** - Comprising the River Swilly tributaries and distributaries e.g. Rogers Burn, embankments, bridges.
- **Built Heritage** - Built heritage falling within the plan area comprises 1 Architectural Conservation Area, 19 buildings on the Record of Protected Structures, an historic streetscape network in the town

centre identified as the 'historic streetscape', identified 'historic buildings' and 'historic residential' areas.

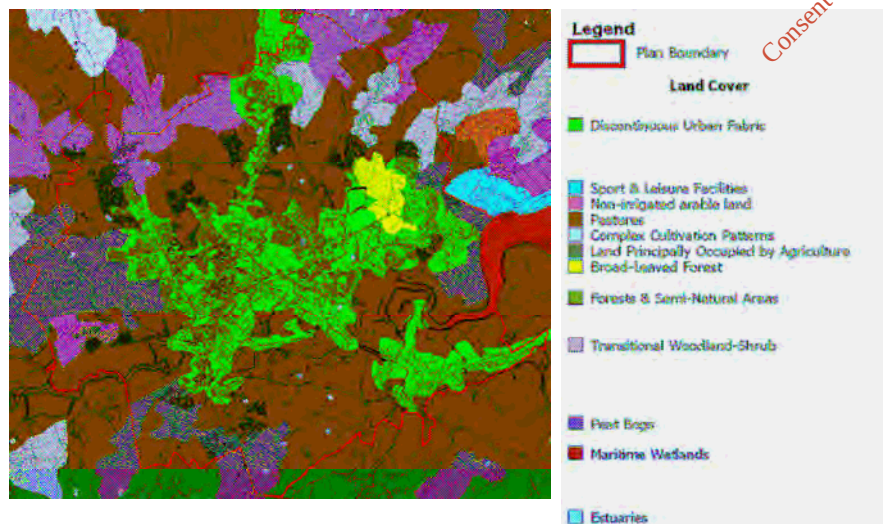
MATERIAL ASSETS & CULTURAL HERITAGE **NON-IMPLEMENTATION OF THE PLAN**

Non- implementation of the plan will result in a reduced policy framework for the protection and integration of the built heritage into the urban form, in particular within the town centre and therein may result in the loss of historic fabric and may result in reduced quality in the town centre.

5.1.7 Landscape

The landscape of Letterkenny is rich and varied. It comprises a valley settlement with surrounding local hillocks making up the Swilly Valley's sloping sides. The landscape in the environs of the town is significantly undeveloped on lands intervening the development along the key arterial roads. This land is largely agricultural in nature. The landscape has retained a significant level of tree cover through both the retention of existing trees and hedgerows and as a result of existing dense woodlands at Kiltory and Ballymacool.

Land cover within the area is varied and is set out in the following map.



LANDSCAPE **NON-IMPLEMENTATION OF THE PLAN**

Non- implementation of the plan will result in lower quality developments both in relation to the individual design and in relation to the layout and form of new areas.

5.2 Description of the environmental characteristics of the area likely to be significantly affected by implementation of the plan

5.2.1 Significant development during the lifetime of the plan

Significant development during the lifetime of the plan, is likely to take place at the following locations and in the following forms:

Location and type of development	What impacts on the environment are likely
Town Centre in the form of retail, commercial and mixed use developments including residential	• Positive impact on human health by means of concentrated provision of services and amenities. • Subsequent potential positive on air quality due to clustering of activities therefore reduction in car journeys. • The large area of undeveloped land provides significant opportunities for development. Much of this undeveloped land is located along the River Swilly; adverse impacts of developing this land may include the degradation of the quality of the river and the flora, fauna and biodiversity, which surround the river.
Town centre in the form of residential development on brownfield sites	• Positive impact through reuse of town centre land. • Reduction in dependency on cars therefore removal of potential threat to air quality. • Indirectly provides for the protection of biodiversity at other locations within the plan

	area. • Provides for opportunity to contribute to the built heritage of the plan area. • Provides for vitality in the mix of uses in the town centre therein contributing to the sustainability of the town centre and resulting in positive impacts on human health.
General Employment lands in the form of redevelopment of existing Brownfield sites and development upon existing Greenfield sites	• Potential loss of general biodiversity; hedgerows, individual trees, groups of trees. • Possible negative visual impacts on landscape. • Consolidation of existing uses and reduction of unnecessary trip generation. • Some increase in vehicular movements with subsequent affects on air and noise quality. • Increased volume of heavy load vehicular movement therefore subsequent affects on air and noise quality. • Opportunities for developer assistance to bring forward strategic routes therefore improving movement around the town, resulting in positive impacts on human health in the form of greater choice in terms of movement, enhanced accessibility, reduced journey times, reduced congestion in town centre.
Commercial Lands adjacent to the Port Road	• Consolidation of existing uses including bulky retail and commercial. • Intensification of use of existing infrastructure. • Slight increases in noise and air pollution.
Residential lands on Greenfield sites throughout the plan boundary	• Potential loss of general biodiversity; hedgerows, individual trees, groups of trees. • Increased trip generation for journeys to centre and subsequent increases in air and noise.

Open Space, Parks and Wildlife corridors	• Positive effect of sustaining a relatively high level of biodiversity through the protection of Green Corridors. • Positive human health effects in relation to quality of life by means of access to clean, green spaces.
Neighbourhood Centre creation	• Positive human health impacts in relation to quality of life by means of access to local retail and services and the creation of vibrant active neighbourhoods. • Reduction of trip generation through localised provision of day-to-day service and retail needs, therefore reduction of dependence on the car as mode of transport resulting in positive impacts on air quality.
Opportunity Sites	• Promotion of reuse of brownfield sites with resultant positive impacts across the spectrum of landscape, biodiversity, soil, air, noise and climate, human health, material assets and cultural heritage.

5.2.2 Sensitive Areas

The following areas within the plan area are considered to be more sensitive to development than others:

- a. River Swilly banks and corridor.
- b. River Swilly flood risk area.
- c. Kilttoy Woods and Ballymacool Woods.
- d. Elevated undeveloped hillside of the town: Drumnahoagh, Creeve, Lisnenan, Kilttoy, Mountain Top, Carnamuggagh, Killylastin, Killyclug.
- e. Rodgers Burn including Whinney Hill and Drum Hill.
- f. Main Street and Ecclesiastical Quarter Architectural Conservation Area.

These areas are identified as more sensitive in nature than others within the plan area due to their character in terms of the range of environmental resources which they provide including biodiversity, flora, fauna, heritage, water quality, landscape, visual aspects and including the natural forces of the town in relation to the River Swilly catchment and flood risk area. The plan will result in positive impacts on areas listed as a) and c), through the protection of these areas from development. The plan will have risks in relation to the likely significant effects on the environment in relation to areas b), d), e) and f) as development potential is identified for these areas within the plan. However, the plan will also have positive impacts on these areas due to the measures developed to manage development at these locations in a manner to achieve quality and appropriate forms of development.

5.3 Identification of any existing environmental problems that are relevant to the plan, particularly those relating to European protected sites.

A number of locations are identified within the plan area as areas that are the subject of environmental problems due to the type of development pressures that persist to date. These are outlined below:

- a. Kilttoy Woods (River Swilly Valley Woods NHA; Site code 002011): The nature of the environmental problem at this location is the pressure for multiple residential development on lands immediately adjoining the

NHA designation and the impact of this development on the biodiversity of the NHA together with visual impacts on the landscape of the encroachment of high density development on this important landscape feature.

- b. Lough Swilly SAC/NHA (site code: 00166) and Lough Swilly SPA (site code: 004075): The nature of the environmental problem at this location is the continued discharge of pollutants to Lough Swilly as a result of the deficiencies in the existing Waste Water Treatment Works capacity. Construction of the upgrade to the WWTW's is anticipated in 2009 and is critical in terms of alleviating this environmental problem and ensuring that the problem is not compounded in the light of the future anticipated growth of the town.
- c. Traditional town centre: The nature of the environmental problem at this location is the pressure for new build development to replace existing built fabric along the 'historic streetscape' of the traditional town centre in a manner which has the potential to conflict with the character of the 'historic streetscape' and with the quality of individual and groups of built fabric. The challenge that presents is the need to promote the traditional town centre as the heart of the town therein providing for new town centre opportunities and vitality whilst developing innovative proposals for the scale and form of floorspace required. New floorspace therefore, should respect and recognise the important character of the 'historic streetscape' and the contribution of this streetscape to the attractiveness of the town centre to both visitors and investors.
- d. Environs area of the plan: The nature of the environmental problem in this area is the pressure for multiple residential developments on lands that are essentially Greenfield, together with the pressure for additional housing proposals on lands identified as 'Strategic Residential Reserve.' This problem is compounded by the quality of layout and forms that as a result do not create quality residential environments that are integrated and sustainable. Specifically this means that the type of difficulties encountered are (i) Impacts on human health as there is a lack of linkages with existing and planned social and community services (ii) Impacts on human health as there is little or no integration of new proposals within a neighbourhood concept (iii) Impacts on human health as there is a lack of infrastructure and physical services to facilitate the development and (iv) Impacts on

landscape and biodiversity (v) Results in car dependant land use pattern as no alternatives in terms of accessibility are available.

6.0 Environmental protection objectives relevant to the plan and description of how those objectives and any environmental considerations have been taken account in preparing the plan

The following section lists environmental protection objectives that are relevant to the plan area of the Letterkenny & Environs Development Plan 2009-2015. These environmental protection objectives are derived on the basis of (a) national, European, and international policy documents, strategies, conventions and Directives that set out the key guiding principles in terms of sustainable development and environmental protection and (b) the indicative list of environmental protection objectives set out in the DoEHLG guidelines to Regional Authorities and Planning Authorities, 'Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment' and (c) an understanding of the environmental characteristics that are specific to the plan area and that as such require consideration within the environmental protection objectives.

The strategic alternatives, growth strategy, plan aims, strategic objectives, objectives and policies of the plan will be measured against these environmental protection objectives.

Biodiversity, Fauna and Flora:

B1: Conserve and enhance designated areas and other areas and features of biodiversity while increasing potential for flora and fauna, where appropriate.

B2: Balance the protection of natural resources with the harnessing of such resources for education, tourism, research and amenity where appropriate.

Population, Human Health:

P1: Ensure the creation of a safe, healthy and high quality environment to live, work and visit including the strengthening and diversification of the local economy.

P2: Ensure the provision of an adequate and sustainable transportation network comprising strategic roads, public transport, walkway/cycleway and the elimination of car dominated development.

P3: Improve quality of life by ensuring the provision of necessary physical and social infrastructure to serve existing and new communities.

P4: Minimise noise, vibration and emissions from traffic and industry.

Soil (including minerals):

S1: Maintain the quality of soils.

S2: Give preference to the re-use of brownfield lands with a particular emphasis on regeneration of town centre areas, rather than developing greenfield lands.

S3: Minimise the consumption of non-renewable sand, gravel and rock deposits.

S4: Minimise the amount of waste going to landfill.

Water:

W1: Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems.

W2: Promote sustainable water use based on a long-term protection of available water resources.

W3: Reduce progressively discharges of polluting substances to waters.

W4: Mitigate the effects of floods and droughts.

W5: Ensure adequate good quality water supply to serve existing and new communities.

Air, Climate, Noise:

A1: Reduce all forms of air pollution.

A2: Minimise emissions of greenhouse gases to contribute to a reduction and avoidance of human-induced global climate change.

A3: Reduce energy use and waste of energy, and maximise use of renewable energy sources and sustainable construction methods.

A4: Reduce trip generation, trip length and the need for motorized transport.

A5: Assess, plan and manage adaptation to climate change impacts such as areas of flood risk.

A6: Minimise noise pollution.

Material assets, Cultural Heritage:

M1: Protect, enhance and utilise material assets and cultural heritage, including built heritage, archaeology & historic reference, natural heritage, waterbodies and associated flood protection measures and views and prospects.

M2: Avoid flood risk and/or river and coastal erosion in selecting sites for development.

Landscape:

L1: Conserve and enhance valued natural and historic landscapes and landscape features.

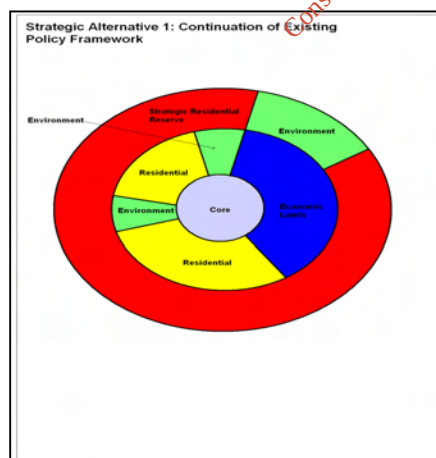
L2: Harness and respect the natural form and character of the landscape in a balanced manner ensuring integration of urban form

7.0 Consideration of alternatives

Article 5 of the SEA Directive 2001/42/EC requires that the environmental report shall set out reasonable alternatives. In doing so, 3 strategic alternatives are considered in order to identify a preferred growth strategy. Each alternative is schematically described below together with the key characteristics of the alternative and an assessment of the alternative against the environmental protection objectives.

7.1 Strategic Alternative 1: Continuation of existing policy framework

This alternative comprises continuation of the zoning framework adopted in 2003 providing for the town centre and area of town centre extension, identification of 'General Employment' lands to the East of the plan area, 1st phase release of residential lands supported by 2nd phase strategic residential reserve and defined areas of 'Local Environment' that provided for limited development where the



landscape has the capacity to absorb. This alternative loosely identifies neighbourhoods within the plan area that are to be strengthened in terms of settlement patterns and provision of local facilities.

The key principles of this strategic alternative are as follows:

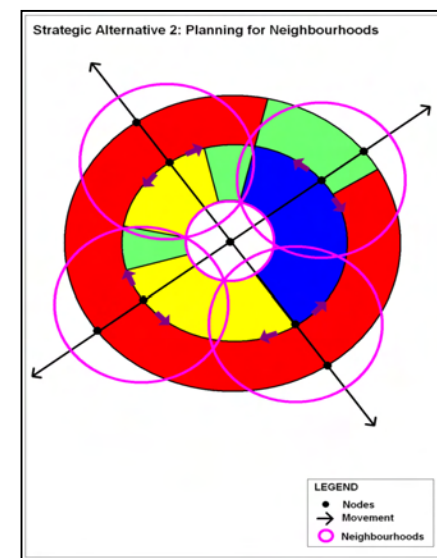
- Promote growth & development as the centre for the northwest.
- Enhance the natural & built environment.
- Support and protect existing economic base
- Strengthen the town centre
- Consolidate and strengthen urban form.
- Improve the quality of residential neighbourhoods.
- Support vibrant communities.
- Identify and prioritise infrastructural improvements.

7.2 Strategic Alternative 2: Planning for Neighbourhoods

This alternative continues the principle zoning framework of the development plan adopted in 2003 but places a greater emphasis on the identification of neighbourhoods and planning around a neighbourhood concept. In doing so, an understanding of the functionality of the existing neighbourhoods in the town is essential together with a strategy for integration of neighbourhoods, development of new emerging neighbourhoods and strengthening the function and form of the town centre.

The key characteristics of this strategic alternative are:

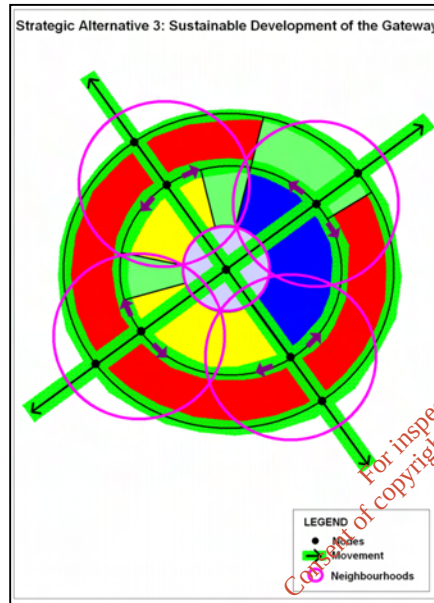
- Promote growth & development of the linked Gateway.
- Consolidation of the urban footprint.



- Integration of neighbourhoods.
- Quality in urban form throughout the plan area.
- Vitality in services/amenities in the context of neighbourhoods.

7.3 Strategic Alternative 3: Sustainable Development of the Gateway

This alternative again continues the principal zoning framework of the development plan adopted in 2003 and also incorporates the neighbourhood concept set out at strategic alternative 2. In addition, this alternative engages wholly in the Strategic Environmental Assessment process by clearly identifying the environmental assets of the plan area and planning for the balanced development of these environmental resources. These environmental resources include as examples, providing a framework in respect of the river corridor, harnessing the potential of the towns built heritage, identifying opportunities for green corridors/linkages. This alternative aims to deliver the characteristics of a Gateway town.



The key characteristics of this strategic alternative are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental resources.
- Quality of urban form.
- Vitality of services.

7.4 Assessment of the likely significant impacts on the environment of implementing the strategic alternatives:

Each of the options 1, 2 & 3 are considered against the environmental protection objectives formulated and set out at section 6.0 previously. In line with the DoEHLG Guidelines, the potential effects on the environment of each option are measured using the following assessment categories:

- ✓ Significant beneficial impact
- ? Uncertain Impact
- X Significant adverse impact
- O No relationship or insignificant impact

The assessment of each alternative against the environmental protection objectives is set out in the form of a matrix table as follows.

Environmental protection objectives	Strategic alternatives		
	1	2	3
B1	√	√	√
B2	√	√	√
P1	√	√	√
P2	?	√	√
P3	?	√	√
P4	√	√	√
S1	√	√	√
S2	√	√	√
S3	?	?	?
S4	?	?	?
W1	√	√	√
W2	√	√	√
W3	√	√	√
W4	?	?	?
W5	√	√	√
A1	√	√	√
A2	√	√	√
A3	?	√	√
A4	√	√	√
A5	√	√	√
A6	?	?	?
M1	√	√	√
M2	x	?	?
L1	√	√	√
L2	√	√	√

The matrix table above makes an assessment of each strategic alternative against the environmental protection criteria. Essentially, each strategic alternative will result in a significant benefit in terms of their likely impact on the environment. However, the significant benefits arising from alternative 3 are likely to be greater than the significant benefits arising from alternatives 1 & 2. In other words the benefits arising from alternative 3 are greater as this alternative provides for a more sophisticated and

detailed approach to the planning framework. Uncertain impact is identified where at a strategic level clarity on the likely impacts are difficult to capture and will be more readily ascertained on assessment of objectives and policies throughout the plan.

7.5 Preferred Strategic Alternative

On the basis of the assessment, option 3 is considered to be the preferred option/ growth strategy for the plan. This represents a balanced approach that recognises the need to integrate sustainability and the impact of the plan on the environment into the policy framework in a manner that means that the planning framework utilises existing environmental resources so as to create a quality urban environment that represents the linked Gateway with Derry for the northwest region. In particular this plan aims to protect key priority areas from new development and at the same time, builds in safeguards elsewhere in terms of design briefs, design statements, concept proposals, infrastructure, density as examples.

8.0 Assessment of preferred option/growth strategy

The following section sets out the assessment of the preferred option against the environmental protection objectives that were established at section 6.0 previously.

Having chosen option 3: 'Sustainable Development of the Gateway', as the preferred option/ growth strategy due to its compatibility with the environmental protection objectives (section 7.0 of this environmental report refers), the environmental report now considers the likely significant effects on the environment in greater detail.

To do so, four steps are undertaken:

- a. Matrix assessment to ensure the strategic objectives of option 3/ the preferred option (i.e. the growth strategy) are compatible with the overall plan aim.
- b. Matrix assessment to ensure the strategic objectives of option 3/ the preferred option (i.e. the growth strategy) are compatible with each other.
- c. Matrix assessment to consider the impact of the strategic objectives of option 3/ the preferred option against the environmental protection objectives set out at section 6.0 of this report.
- d. Matrix assessment to consider the impact of the objectives and policies of the plan, flowing from the strategic objectives of option 3/ preferred option against the environmental protection objectives set out at section 6.0 of this report.

Each step is set out on the following pages.

8.1 Compatibility of strategic objectives with overall plan aim (step a)

Overall plan aim	Strategic objective	Compatibility
To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social & cultural activities.	Strategic Objective 1: To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	√
	Strategic Objective 2: To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	√
	Strategic Objective 3: To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	√
	Strategic Objective 4: To create a consolidated, vibrant, multifunctional, accessible and attractive town centre	√
	Strategic Objective 5: To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√
	Strategic Objective 6: To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	√
	Strategic Objective 7: To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	√

In each case, the strategic objectives are (a) found to have a direct relationship with the overall plan aim and (b) found to be compatible with this aim.

8.2 Compatibility of strategic objectives (Step b)

The assessment below is classified as follows: √ Compatible; X Not compatible; O No relationship; ? Uncertain

	Strategic Objective						
1	To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	1					
2	To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	√	2				
3	To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	√	√	3			
4	To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.	√	√	√	4		
5	To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√	√	√	√	5	
6	To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	√	√	√	√	√	6
7	To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	√	√	√	√	√	√

The assessment shows that the strategic objectives are found to be inextricably linked and that in terms of the principles set out in the strategic objectives there is compatibility across the full range. The positive interrelationship of these strategic objectives with each other sets a strong framework for the development of further objectives and policies within each section of the plan.

8.3 Assessment of strategic objectives against environmental protection objectives (Step c)

	Environmental Protection Objectives																								
	B		P				S				W					A						M		L	
Strategic objective	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2
1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	O	√	√	O	√	√	O	O	O	O	O	O	O	O	O	√	√	O	√	O	√	O	O	O	O
2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	O	O	√	√	√	√	√	O	O	O	O	√	O	√	√	√	√	O	√	√	O	O	O	O	O
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	O	√	√	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O
4. To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.	O	O	√	√	√	√	O	√	O	O	O	O	O	O	O	√	√	O	√	O	√	√	O	√	√
5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√	√	√	O	O	√	√	√	√	O	√	√	√	√	O	√	√	√	O	√	√	√	√	√	√
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	O	O	√	√	√	√	√	O	O	O	O	O	O	O	O	√	√	O	√	O	√	O	O	O	O
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	O	O	√	√	√	√	O	O	O	O	O	√	√	O	√	√	√	√	√	O	√	O	O	O	O

The assessment shows that the strategic objectives show generally positive impacts across a broad range of the environmental protection objectives. This indicates that the strategic objectives comprehensively address the range of environmental issues that are identified within the plan area and that they are generally positive impacts or no impact at all.

8.4 Assessment of objectives and policies against environmental protection objectives

The following pages set out the assessment of the detailed policies contained in the plan in terms of their compatibility with the environmental protection objectives set out at section 6.0 of this environmental report. The assessment is set out in the form of a matrix using the following assessment criteria:

- √ Significant beneficial impact
- ? Uncertain Impact
- X Significant adverse impact
- O No relationship or insignificant impact

The matrices are arranged in line with the sequence of policy sections contained in the Letterkenny & Environs Development Plan, Volume 1, Part B.

Developing Neighbourhoods Through Urban Design

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective To achieve the aims of consolidation, integration, vitality and quality.	√	O	√	√	√	√	O	√	√	√	√	O	O	O	O	O	√	√	√	√	O	√	O	√	√	
Objective To develop a strategic framework extending from strategic neighbourhood level to local level so as to guide new development.	√	O	√	√	√	O	O	O	√	√	√	O	O	O	O	O	√	√	√	√	O	√	O	√	√	
Objective To develop sustainable neighbourhoods that are quality places to live.	√	O	√	√	√	O	O	O	√	√	√	O	O	O	O	O	√	√	√	√	O	√	√	√	√	
Objective To reduce negative impacts on the environment through improved permeability and accessibility within the urban form.	√	O	√	√	√	O	O	√	√	√	√	O	O	O	O	O	√	√	√	√	O	√	√	√	√	
Objective To harness the urban form in a manner that engages and acknowledges the quality of existing built fabric and which provides opportunity for new and innovative built form including the preparation of a Character Appraisal of the 'Historic Streetscape' of Letterkenny.	O	O	O	O	O	O		√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	√	O	O	
N1: Delivering the vision for neighbourhoods. The Councils will seek to work in partnership with Government Departments, other agencies and service providers, the community and voluntary sector, the business community and the construction sector to deliver the Vision for each 'key growth node neighbourhood'.	O	O	√			√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health
N2: Development proposals within 'Key Growth Node Neighbourhoods.' Proposals for new development will, in the first instance be considered at a strategic level by the developer within the context of the neighbourhood strategy set out in Part B, Section 2.0 of this plan, so as to demonstrate that the proposal: a. Contributes to the vision (written and mapped) for the 'key growth nodes neighbourhoods.' b. Relates to the wider neighbourhood strategy and land use zonings within the neighbourhood. c. Provides for opportunities for linkages, social/community infrastructure and the development of neighbourhood nodes.	O	O		√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health
N3: Urban Design Principles: Development proposals shall be required to demonstrate that the 12 urban design criteria set out in the Department of the Environment, Heritage and Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, have been utilised in the design and layout of the proposal.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health and on the landscape
N4: Informing Design Through Historic Buildings and Streetscapes The Councils will utilise the form and layout of existing historic buildings and streetscapes in Letterkenny so as to inform (a) good urban design (b) the development of integrated sustainable neighbourhoods and (c) proposals for development at a local level. In doing so, the Councils will implement policies N5 -N16 and the policies contained in Part B, Section 7.0	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape
N5: Historic Buildings. The Councils will, in relation to buildings identified on the land use zoning map as 'Historic Buildings': a. Protect, enhance and promote 'historic buildings' within the Letterkenny plan area. b. Where an 'historic building' reflects a residential character or was previously used in a residential capacity, compliance with those policies in relation to the 'historic residential' will be sought (Policies N15-N16 refer).	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape
N6: Record of Protected Structures. The Councils will protect structures included on the Record of Protected Structures (hereafter referred to as the RPS) by ensuring any works including maintenance, alteration/extension and/or repair of a Protected Structure shall be carried out in a manner sensitive to the character and setting of the structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape
N7: Works to a Protected Structure Works to a Protected Structure will only be permitted where it is clearly demonstrated that proposed works will enhance the character and setting of the Protected Structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape
N8: Demolition The Councils will resist the demolition of any protected structure or proposed protected structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape
N9: Content of planning applications at a Protected Structure. Planning applications in relation to a Protected Structure will include such information as is outlined in the 'Architectural Heritage Protection Guidelines for Planning Authorities', Chapter 6, as prepared by the Department of the Environment, Heritage & Local Government.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
N10: National Inventory of Architectural Heritage Policy: The Councils will support the work of the NIAH in collecting data relating to the architectural heritage of the county. Structures identified worthy of note by the NIAH will be considered by the planning authority as such, before making a decision on related planning applications.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N11: Additions to the RPS It is the policy of the Councils to identify future additions to the Record of Protected Structures and undertake to make such additions under the provisions of the Planning and Development Act 2000-2006, Section 55, during the lifetime of this plan.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N12: Development affecting Protected Structures. It is the policy of the Councils to: a. To protect buildings on the Record of Protected Structures their setting and curtilage/attendant grounds, and to ensure development proposals do not threaten the special character of the Protected Structure and; b. To ensure any proposed development within the vicinity of the protected structure shall be sited and designed so as only to positively impact upon the setting and character of the protected structure referred to.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N13: The Ecclesiastical Quarter Architectural Conservation Area It is the policy of the Councils to implement an Architectural Conservation Area, in accordance with the Planning & Development Act 2000-2006 herein described as 'The Ecclesiastical Quarter ACA.'	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N14: Management of the ACA It is the policy of the Council to manage the ACA as follows: - a. The Councils shall ensure that any development in the ACA will be carefully controlled to protect, safeguard and enhance their special character. The special character of the area includes its traditional building stock and material finishes, spaces, streetscape, landscape and setting. b. Streetscape views within, into and out of the ACA shall be maintained, enhanced and protected, particularly with reference to the character of Cathedral Square, Church Lane, and Castle Street c. It is the policy of the Councils to ensure that any development, modification, alteration or extension affecting a protected structure, adjoining structure or structure within an Architectural Conservation Area, are sited and designed appropriately and are in no way detrimental to the character or setting of the structure or surrounding area. d. It is the policy of the Councils to protect structures recorded on the RPS and features that contribute to the character of the ACA. e. In consideration of applications for development within the ACA, the following principles will apply: • Proposals will only be permitted where they positively enhance the character of the ACA. • The siting of new buildings will, where appropriate, retain the existing street building line. • The massing and scale of any new building form will respect and positively integrate with neighbouring buildings and the character of the area. • Where it is not desirable to comply with car parking standards, in respect of developments within an ACA, the Councils will consider a Financial Contribution in lieu of shortfall in car parking spaces.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N15: Areas identified as 'Historic Residential.' It is the policy of the Councils to protect the residential communities within the town centre, as identified on the land use zoning map as 'Historic Residential' and their residents in order to provide an attractive user friendly and safe living space for the town's residents.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	0	Significant beneficial impacts focused on population and human health
N16: Management of 'Historical Residential.' It is the policy of the Councils to manage areas designated as 'Historical Residential' on the land use zoning map as follows: - a. The Councils will to ensure the character, setting and design of the 'historic residential' is protected, either in an individual or collective capacity, so as inappropriate intervention or redevelopment will not be permitted. b. The Councils will to protect historic houses and associated outbuildings and as importantly their site, setting/attendant grounds to include gatehouses, trees, boundary walls/railings and laneways as an important element of our identity to inform future generations. c. The Councils will facilitate the re-use of traditional buildings and associated outbuildings of value in favour of the unsustainable and unnecessary demolition of remaining traditional building stock. d. Where an 'historic building' as identified on the land use zoning map reflects a residential character or was previously used in a residential capacity, compliance with policy (N15 and N16) in relation to the 'historic residential' are to be referred to.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health and management focus on historical residential including an emphasis on the landscape
N17: 'Development proposals within 'Established Development.' Proposals for development within areas zoned as 'Established Development' will only be permitted where it can be demonstrated that the proposal will integrate affectively with the surrounding area and that there will be no over- development of the site or inappropriate densities. In this regard, a proposal must demonstrate that the development is appropriate in its context and setting, that the scale, massing, footprint and height is appropriate and that it does not detract from the character, amenity and design of the surrounding neighbourhood including the character, amenity and design of surrounding buildings. Proposals for intensification of an existing site within 'Established Development' shall be required to submit a design concept to demonstrate the appropriateness of the proposed development in line with this policy.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0	Significant beneficial impacts focused on population and human health
N18: Signage Policy The Councils are in favour of promoting the functionality, health and vibrancy of Letterkenny through effective signage. The Councils will promote the use of Irish language, colour coding and symbols to provide quick and easy recognition. All signage should respect the architectural environment of National Monuments, important structures areas of civic amenity, and the natural environment of views and prospects of special amenity value and interest. Volume 2 - Development Guidelines & Technical Standards contains detailed definitions and permissible signage both public and privately, for the following categories: - Directional Welcome, Information & Interpretative Commercial & Business Tourism B & Bs, Guesthouses, Hotels Advertising Where a proposed sign is not covered in the above categories, the Councils will apply the criteria best suited to the proposed type of signage.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape

Housing

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective To supply sufficient quantity and range of lands to meet future housing need including social and affordable housing need.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective To ensure future sufficient strategic landbank.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective To promote quality in new residential areas.	√	0	√	√	√	√	√	0	√	√	√	0	0	0	0	0	√	√	√	√	√	√	√	√	√	
Objective To promote the delivery of sustainable integrated residential neighbourhoods though new residential development.	√	0	√	√	√	√	√	0	√	√	√	0	0	0	0	0	√	√	√	√	√	0	0	0	0	
H1: New Housing Development New housing development will predominantly be accommodated on lands zoned for the purposes of 'Primarily Residential' as outlined in policy H2 below. However, the Councils will consider new housing development at other locations as follows: a. Within 'Established Development' subject to policy N17 b. Within the town centre subject to the policies set out in Part B, section 7.0 c. Within identified 'Opportunity Sites' where the planning brief for the 'Opportunity Site' is such as to include residential development.	0	0	√	√	√	0	0	x	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.. Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as most of the lands zoned residential development consists of greenfield lands.
H2: Housing within 'Primarily Residential.' The Councils will support proposals for housing development on lands identified as 'Primarily Residential' on the land use-zoning map.	0	0	√	√	√	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health. Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as most of the lands zoned primary residential consists of greenfield lands.
H3: Single Houses in 'Primarily Residential' Proposals for single dwellings will only be permitted on lands identified as 'Primarily Residential' where it can be clearly demonstrated that; a. The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of comprehensive integrated residential development/s utilising the entire site area; and b. The location and layout of the dwelling would not compromise the line of any proposed relief road; and c. The proposal would not be detrimental to the residential amenity of the neighbouring properties or be injurious to the general character of the surrounding area.	0	0	√	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as policy H3 is in relation to land zoned primary residential which relates mainly to greenfield areas.
H4: Release of 'Strategic Residential Reserve.' The Councils will ensure the adequate supply of future strategic landbank for the purposes of housing beyond the life of the plan through the identification of lands as 'Strategic Residential Reserve.' The Councils will examine the release of 'Strategic Residential Reserve' lands on the basis of justification in the context of an annual housing monitor, the continued assessment of need and levels of supply and availability of or requirements for physical and social infrastructure in the context of the neighbourhood strategy. Release of 'Strategic Residential Reserve' lands shall only be carried out in the context of a variation to the development plan.	0	0	0	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as most of the lands zoned as strategic residential are greenfield lands.

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
H5: Single Houses in ‘Strategic Residential Reserve.’ Proposals for single dwellings will only be permitted on lands identified as ‘Strategic Residential Reserve’ where it can be clearly demonstrated that; a. The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of long term multiple residential development/s upon release of the land in accordance with its strategic function under Policy H4; and b. The location and layout of the dwelling would not compromise the line of any proposed relief road or infrastructure corridor; and c. The scale and form of the development would respect the existing character of the area and shall not have an adverse impact to the existing character of the area or the residential amenity of adjoining properties; and d. The proposal can reasonably connect to the future provision of mains services to the area; and e. The development will not prejudice access to land within the reserve for future development and will not contribute to forms of ribbon development that cumulatively could result in the land locking of the ‘Strategic Residential Reserve’.																										Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as policy H5 is in relation to land zoned as strategic residential reserve which are mainly greenfield lands.
H6: Integrated Sustainable Neighbourhoods The Councils will require that proposals for new residential development are of a design concept, form and layout that will contribute to the delivery of sustainable residential neighbourhoods in line with Part B, Section 2 of this Plan, the Department of Environment, Heritage & Local Government publications entitled, ‘Sustainable Residential Development In Urban Areas, Guidelines for Planning Authorities,’ May 2009 and ‘Urban Design Manual, A Best Practise Guide,’ February 2008 and policies H7, 8 & 9 of this plan.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	√	O	O	√	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
H7: Design Briefs The Councils will undertake to prepare a series of Design Briefs in respect of lands zoned ‘Primarily Residential’ that will be used in the assessment of planning applications and against which a Design Statement in the context of a planning application (policy H8 refers) will be measured.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	√	O	O	√	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
H8: Design Statements The Councils will require Design Statements to be submitted as part of any planning application process for all multiple developments. Design Statements shall address the Design Brief (where available) that has been prepared by the Councils.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
Policy H9: Concept Proposals The Councils will require that a Concept Proposal be submitted as part of any planning application for multiple developments. The Concept Proposal will describe elements of the scheme such as land uses and density range, open space hierarchy and built form, boundary conditions and connections and identify any requirement for an EIA.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
H10: Assessing planning applications for housing schemes The Councils will use the 12 criteria set out in the Department of Environment, Heritage & Local Government publication, ‘Urban Design Manual, A Best Practise Guide’, February 2008, during both pre- application consultations and at planning application stage for housing schemes. In addition, new housing schemes will be required to demonstrate: • That the design is sympathetic and responsive to the site characteristics including the landform, exposure to climate, and the built and natural heritage. • That the design provides for a high quality residential development both in terms of the overall site and also in relation to the individual dwelling in recognition of the acceptance of higher densities. • That the design considers all aspects of the layout in totality ensuring compatibility between structures, public amenity spaces landscaping, and access to and within the site, and • That the design does not interfere negatively with the residential amenity of adjoining/adjacent properties and that new homes offer a decent level of amenity, privacy, security and energy efficiency. • That the design promotes and encourages walking and cycling in line with Policy H13. • That the design provides for the right quantity and quality of public open space in line with Policy H18 & H19. • That the design includes measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	√	√	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
H11: Managing Quality The Councils will not permit proposals for new housing schemes where the design is such that it does not respond to the policies to achieve quality set out at H6, 7, 8, 9 & 10 of this plan nor to the guidance set out in the Department of the Environment, Heritage & Local Government publication ‘Urban Design Manual, A Best Practise Guide’, February 2008.	O	O	√	√	√	√	O	O	O	O	O	√	O	O	√	O	O	√	√	√	O	√	O	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.
H12: Design of Residential Streets The layout and design of streets in residential areas shall provide for clarity in the role and function of each street by identifying clearly the hierarchy of streets that will provide for: connectivity and permeability; sustainability in terms of priorities to walking, cycling and public transport together with a reduction in the need for car borne trips; safety; legibility in that streets should be easy for people to find their way around and; sense of place in that streets should contribute to the creation of attractive and lively places. A dominance of cul-de-sacs without provision for other functions of streets will not be permitted.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	√	O	√	√	Significant beneficial impacts focused on population and human health, and landscape
H13: Accessibility Direct pedestrian and cycle linkages shall be provided within proposals for new housing schemes interconnecting with central amenity areas, adjoining neighbourhood developments and neighbourhood facilities and provided in addition to the primary access to the development and be designed to have maximised passive surveillance from surrounding properties be well lit and maintained and of a materials and finish that is of a high quality. Linkages that follow indirect routes and to the rear of properties will not be considered acceptable. Road layouts shall reflect the requirements of Policy H12: ‘Design of Residential Streets’ and where appropriate, (i.e. adjacent to amenity areas, schools and community/neighbourhood facilities) introduce the use of raised surfaces to reduce traffic speed. Adequate provision shall be made within the development to accommodate drop-off/pick-up points and turning manoeuvres for public transport vehicles.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health
H14: Layout New residential developments shall be laid out and orientated in order to make use of the landscape characteristics including local features and vistas, and maximise from passive solar gain. Development adjacent to amenity areas shall be orientated to face onto the amenity areas to provide maximum informal surveillance. Locating amenity areas to the rear of properties will not be permitted. Dwellings should be designed to present an attractive outlook onto adjacent roads (existing and proposed). Front elevations should not face onto the rear private spaces of other dwellings.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy H14

	Assessment of policies against environmental protection objectives																										
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment	
H15: Housing Densities Proposals for new housing development must demonstrate that they achieve the greatest efficiency in the use of the land appropriate to its context, and encourage a sustainable pattern of development whilst ensuring the highest quality residential environment. As a guide, densities of 35-50 units per hectare will be sought. Higher densities may be more appropriate at the following locations but any such proposals must be accompanied by high qualitative standards of design and layout: Town centre. Brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces) where the Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied. Public transport corridors i.e. within 400- 500 metres of a bus stop (where these exist at present in respect of the town bus service or where public transport networks are planned for the future). Inner suburban/infill where Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied. Institutional lands	0	0	√	0	0	0	0	√	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	√	
H16: Housing Densities within 'Low Density Residential' Lands. Densities lower than 35-50 units per hectare will be considered on lands identified as 'Low Density Residential' on the land use zoning map.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	Limited relationship between environmental protection objectives and policy 16.
H17: Mix and Type of Units Proposals for residential development will be required to provide a mixture of house types and sizes in order to reasonably match the requirements of different household categories within the Plan area, including those groups with particular special needs. The Councils will seek to achieve a balance of housing stock to meet the needs and aspirations of the people residing within the Plan area.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy 17.
H18: Open Space in New Housing Schemes Multiple residential developments in general shall include a minimum of 15% of the overall site area reserved as public amenity area in accordance with the requirements set out below and the standards set out in the 'Development Guidelines & Technical Standards', in volume 2 of this plan. The provision of public amenity open space within new residential developments shall: a. Be conveniently located within the development, and designed as an integral part of the overall layout acting as an natural focal point that contributes to the visual enhancement of the development, and b. Be of a high quality design, providing for a multi function of uses, through the use of hard and soft landscaping techniques including equipped formal play areas, informal greens, furniture, paved and planted amenity areas, and c. Provide adequate lighting and signage, and highly accessible linkages with the surrounding public footpath network and other designated amenity areas, and d. Include a programme of maintenance.	√	√	√	√	√	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, and landscape	
H19: Open Space in High Density Areas For multiple residential developments within the town centre and on brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces), public open space shall be required at a minimum rate of 10% of the total site area where the proposal demonstrates that the quality of the development is significant.	√	√	√	√	√	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, and landscape	
H20: Landscaping New residential developments shall provide landscaping to provide screening, enclosure, shelter, and acoustic barriers to enhance the overall visual/environmental impact of the development. Detailed landscaping schemes shall be required with planning applications and will include: a. Species, variety, number and location of trees, shrubs and other features to be provided, and b. Proposals to retain and incorporate existing trees and hedgerows within the development (in accordance with Policy NE4, Part B, section 5.0 of this plan), and c. Programme of implementation of the landscaping scheme.	0	0	√	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	√		
H21: Car Parking New residential developments shall provide for adequate off-road car parking to facilitate the development in accordance with the standards set out in 'Development Guidelines & Technical Standards', contained at Volume 2.	0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H21	
H22: Housing Schemes and the Need for Education Facilities It is the policy of the Councils to monitor the need for education facilities within the plan area in the context of the ongoing implementation of the plan in partnership with the Department of Education and Science.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0		
H23: Provision of social and Affordable Housing Proposals for residential development on lands zoned 'Primarily Residential' or for mixed use purposes shall be required to comply with the policies set out in the 'Housing Strategy' at Volume 2 of this plan so as to make adequate provision for social and affordable housing under Part 5 of the Planning & Developments Act 2000-2006.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H23	
H24: Provision of Childcare Facilities Proposals for residential development shall be required to comply with the policies set out in the 'Childcare Strategy' at Volume 2 of this plan.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H24	
H25: Sustainable Building Practices in new Housing Schemes In line with policy NE12, Part B, section 5.0 of this plan, the Councils will encourage and support housing scheme proposals that utilise sustainable building practices.	0	0	√	0	0	0	0	√	√	√	0	0	0	0	0	0	0	√	0	0	0	√	0	0	0	Significant beneficial impacts focused on soil.	
H26: Residential Amenity It is the policy of the Councils both to protect the residential amenity of existing residential units and to promote design concepts for new housing that ensures the establishment of reasonable levels of residential amenity.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H26	
H27: Sub-Division of Residential Property The Councils will permit development that involves the sub division of residential sites only where it can be clearly demonstrated that: a. The existing house is not part of an overall development and the proposal would compromise the original layout of which the existing house formed part thereof. and	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H27	

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
b. The curtilage of original dwelling is not subdivided by more than 50% by the proposal, and c. The footprint of the proposed dwelling would not exceed one third of the new curtilage, and no window of the new dwelling is within 4m from any curtilage boundary, and d. The proposal would not appear incongruous with the density, massing, scale, proportions, materials and overall design and character of the existing property and the character of the street scene and surrounding area; and e. The proposal would not adversely effect the visual and residential amenity of adjoining properties and the surrounding area or give rise to adverse transport or road safety effects and will provide an acceptable level of parking for every separately occupied dwelling, and f. The proposal would not reduce the provision of adequate private amenity space for the existing dwelling and will provide sufficient private amenity space for any new separately occupied dwelling(s). The Councils shall not normally permit development of backland sites (e.g. those in back gardens which do not have road frontage) on the grounds of character and amenity.																										
H28: Conversion of Dwellings to Flats Proposals for the conversion of a building into flats or the conversion of existing large flats into smaller units will normally be permitted, provided that: a. The building/site is capable of accommodating the additional residential amenities and avoids over-development; and b. The proposal would not hinder traffic movement or prejudice the safety of road users or pedestrians; and c. The proposal includes amenities comprising refuse disposal facilities, drying areas and access to private outdoor amenity space; and d. The proposal is for self-contained flats; and e. Where appropriate, the proposal shall include convenient and adequate off-street car parking that integrates with the neighbouring properties.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy H28.
H29: Extension to or Refurbishment of a Residential Dwelling Proposals for extension to a dwelling will be permitted if all of the following criteria are met: a. The development reflects and respects the scale and character of the dwelling to be extended and its wider settlement; b. Provision is made for an adequate and safe vehicular access and parking; and c. The proposal would not adversely affect the amenity of adjoining properties.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy H29.
H30: Use of Upper Floors Above Commercial Premises For Residential Accommodation. Proposals for the re-use of upper floors above retail and commercial premises within the plan area for the purposes of residential accommodation will be permitted where it can be demonstrated that: a. The development does not prejudice existing commercial activity or result in the loss of residential amenity; and b. The development creates suitable pedestrian and vehicular access arrangements.	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy H30.
H31: Change of use of residential properties. It is the policy of the Councils that proposals for change of use from residential to commercial, within established residential areas, will not normally be permitted. This policy does not apply to 'Home-based employment', policy E5 refers.		O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy H31.

Social & Community Infrastructure

	Assessment of policies against environmental protection objectives																									
	P				S				W				A													
Policy																										Comment
Objective: To provide for the integration of social and community facilities within new residential neighbourhoods.	O	O	√	√	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	
Objective: To provide for social inclusion by ensuring ready and equal access to the range of social and community facilities.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	
Objective: To reserve land for community and institutional, cultural, recreational and amenity purposes.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	
Objective: To reserve land for educational purposes which may include ancillary recreational and childcare facilities.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	
Objective: To provide a co-ordinated and graded system of linked parks, open spaces and outdoor recreation areas which provide a range of active and passive open spaces for all sectors of the community resulting in a 'necklace' of high quality open space.	√	√	√	√	√	√	√	O	O	O	√	O	√	O	O	O	√	√	√	√	√	√	√	√	√	
Objective: To protect and improve quality and amenity value of existing open spaces.	√	√	√	√	√	√	√	O	O	O	√	O	√	O	O	O	√	√	√	√	√	√	√	√	√	
Objective: To identify valuable natural open space resources, landscape settings and other opportunities to develop new open spaces and recreational facilities that will provide for the incremental growth of the town.	√	√	√	√	√	√	√	O	O	O	√	O	√	O	O	O	√	√	√	√	√	√	√	√	√	
CF1: Provision of Health Services It is the policy of the Councils to work in partnership with the Health Service Executive in supporting and delivering the existing and future growth and expansion of health care facilities in Letterkenny together with affordable housing. In doing so, development proposals will be permitted for the provision of new, or extensions to existing, health facilities with a particular focus on Letterkenny General Hospital provided that the proposal: a. Would not have a significant detrimental impact on amenity of nearby occupiers; and b. Provides adequate access and parking facilities; and c. Supports existing or planned public transport network; and d. Establishes safe links for pedestrian and patient movement; and e. Would not have a detrimental impact on identified 'Protected Structures' or Historic Buildings/Groups of Buildings'.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF2: Development within the 'Strategic Community Opportunity.' On lands identified as 'Strategic Community Opportunity' on the land use zoning map, the Councils will seek to achieve a mix of health, social and community development which may include hospital expansion, community health, childcare facilities, affordable housing, community support housing. Any other use not identified herein will be considered on its own merits against the objective of establishing an area of integrated community provision that will provide benefits in terms of community development or health provision or social inclusion.	O	O			√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF3: Provision of Residential Care Homes Proposals for Residential Care Homes and Nursing Homes will be permitted where it can be demonstrated that: a. Adequate car-parking is provided for residents, staff and visitors; and b. Sufficient private open space is provided for residents; and c. They would not significantly detract from the amenity and character of the surrounding area.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF4: Provision of Childcare Facilities The Councils will encourage and promote the provision of high quality childcare facilities throughout identified neighbourhoods, within, adjacent to, or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes, and existing residential areas in order to facilitate localised provision of and increased accessibility to childcare facilities, and sustainable development in accordance with the Childcare Strategy contained at Volume 2 of this plan. The Councils shall establish a system of monitoring the achievement of the provision of childcare facilities in the locations set out above. Neighbourhood centres may be identified and used for the provision of childcare facilities where the Councils consider it more appropriate to cater for a wider area. Proposals for new childcare facilities will comply with the standards set out in the Childcare Strategy contained at Volume 2 of this plan.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF5: Provision of Educational Facilities The Councils will seek to work in partnership with the Department of Education and Science in the delivery of new primary and post primary educational facilities in line with the growing needs of the town.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF6: Overdevelopment of existing school grounds The Councils will support the Department of Education & Science in planning ahead for the provision of new school facilities however, extensions to existing schools or the provision of increased portable accommodation within school grounds for the purpose of accommodating increased student numbers, will only be permitted where the development would not lead to the loss of play/sports or car parking areas; would not be detrimental to the amenity of adjoining properties, or would not otherwise constitute a traffic hazard (as the result of the increased number of vehicles and associated turning movements generated by the proposed development).	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF7: Letterkenny Institute of Technology The Councils will support the continued growth and expansion of the Letterkenny Institute of Technology including the Mission and Vision set out in the Letterkenny Institute of Technology's Strategic Plan and including business development/incubation projects that are associated with the Institute subject to the following: a. That any new development is of a high quality and innovative architectural design that will represent landmark buildings to identify this important site. b. That any new development located on the Port Road side of the campus will be of a density that both maximises the site size and that provides for a Gateway entrance to the town whilst elsewhere on the site, new development will not impact negatively on residential amenities. c. That any new development makes provision for permeability, ease of access and provision of appropriate infrastructure that will support walking, cycling and public transport.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.

Policy	Assessment of policies against environmental protection objectives																								Comment
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d. That any new development will not give rise to unacceptable transport or environmental effects. e. That proposals to integrate relevant social infrastructure, such as childcare, will be encouraged.																									
CF8: Letterkenny Institute of Technology 'Strategic Future Zoning.' It is the policy of the Councils to support the long-term strategic growth of Letterkenny Institute of Technology by identifying lands for 'Strategic Future Zoning' to provide for the incremental growth of the existing campus over a long term period.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF9: New Recreation, Leisure and Community Facilities. Proposals for recreation, leisure and community facilities and extensions, conversions and reuse of existing facilities for recreation, leisure and community activities will be permitted where it can be demonstrated that such facilities will: a. Be accessible to local residents, pedestrians, cyclists and those with special mobility needs; and b. Not significantly detract from the amenity and character of the surrounding area; and c. Provide adequate access and parking facilities.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF10: Retention of Recreation, Leisure and Community Facilities. Development proposals for the change of use of a recreation, leisure or community facility will only be permitted where the applicant can demonstrate: a. That there is insufficient local demand for the existing facility; or b. That an alternative replacement facility of equal or greater community benefit is to be provided for the respective area.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF11: Existing open space The Councils will seek to improve the quality and scale of the existing open space so that open spaces are well designed, attractive to use, safe, and adequately serve the needs of the demographics in the plan area.	O	O	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy CF11
CF12: Protection of existing open space It is the policy of the Councils to protect land of recreation and open space value in order to ensure the provision of sufficient lands and amenities for the use and enjoyment of the public. There will be a presumption against development on open space unless an assessment has been undertaken which clearly shows that the land is surplus to requirements or is not functioning properly due to its scale, location or layout or where there is some significant community gain from its development for other recreational or community purposes.	√	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape.
CF13: The Provision of a Graded and Coordinated System of Parks The Councils will aim to deliver a hierarchy approach through the grading and co-ordination of a system of parks so as to provide a balance in the variety and choice of active and passive open spaces within the plan area which can be enjoyed by all sectors of the community.	√	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF14: New Districts Parks and Neighbourhood Parks The Councils will aim to achieve a greater supply of district parks as indicated on map no 3, 'Neighbourhood Strategy- New Neighbourhood Structure' by working in partnership with other agencies, voluntary groups and individuals so as to bring forward opportunities to improve access to District Parks throughout the plan area.	√	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF15: Pocket Parks New applications for residential development will be required to make provision for 'pocket parks' as part of the overall design statement and concept proposal that are integrated within the overall layout and accessible by means of identified walkways/ linkages from residential properties and in line with policies H8, H9 and H10, H18 & H19.	√	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF16: A 'Necklace' of Open Spaces. The Councils will identify and encourage links between open spaces (a 'necklace' of open spaces) that particularly benefit wildlife and biodiversity and that facilitate access to open space. In identifying a network of open space the Councils will identify some spaces within the network with limited access to provide a haven for wildlife habitats and to achieve a balance between people and animals.	√	√	√	√	√	O	O	O	O	√	O	O	O	O	O	O	√	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF17: Walkways/Cycleways The Council will encourage the provision of new high quality walkways and cycleways and the upgrading of existing networks to and within open spaces to ensure that they are safe accessible and attractive to use.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health.
CF18: Management and Maintenance of Open Space Developers will be required to make suitable provision for the adequate completion of open space areas and for the future management and maintenance of open space. Management regimes shall be set up to take on future maintenance responsibilities, which can take the form of Development Trust or a Management Company.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy CF18
CF19: Financial Contributions in lieu of open space The Councils will consider a Special Development Contribution to provide for a financial contribution in lieu of open space provision where considered expedient by and at the absolute discretion of the Council such contribution being held solely for the purpose of the acquisition/provision of open space and/or recreational, amenity or community facilities located in the neighbourhood in which the proposed development is to be located.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy CF19.
CF20: Cemeteries & Burial Grounds The Councils will facilitate identification of, and support in principle, provision of cemeteries within the Plan Area.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy CF20

Natural Environment

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective: To protect, manage and enhance the natural environment and ensure that environmental and ecological issues are considered in all areas of development.	√	√	0	0	0	0	√	0	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	
Objective: To integrate natural environment and recreation facilities to form a combined resource.	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	
Objective: To protect areas within Environmental Designations, such as NHA's, SAC's, SPA's.	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	
Objective: To encourage the use of and access to the Natural Environment where appropriate	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To raise awareness and improve practices in relation to nature conservation by promoting the development and implementation of codes of best practice in partnership with other relevant agencies in line with the County Heritage Plan and Biodiversity Plan for Donegal.	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	√	√	√	
Objective: To provide appropriate policy framework in relation to archaeology.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	
Objective: To provide a framework to protect against flooding.	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	0	√	0	0	
NE1: SAC, SPA, NHA and associated adjoining lands. Lands identified as 'SAC, SPA, NHA & associated adjoining lands' on the landuse zoning map have been designated as such under European and National legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all of the following criteria can be met: a. There is significant and identifiable public interest in doing so; and b. There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation (Volume 3, Environmental Report refers); and c. The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and d. Adequate mitigation measures are put in place.	√	√	√	0	0	0	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on biodiversity, fauna and flora and landscape.
NE2: Local Environment It is the policy of the Councils to limit new development within areas identified as 'Local Environment' to limited residential development of single housing only so as to ensure minimum negative impact on: a. The landscape setting i.e. The proposal must demonstrate that the development will not be an obtrusive and dominant feature within the landscape but rather that the development must be of a design form and scale that can be integrated comfortably into the landscape utilising and retaining key landscape features such as trees, hedgerows. b. The biodiversity quality of the area where existing habitats are of a significant level of biodiversity (Map No 1 contained in Volume 3, Environment Report, 'Biodiversity' at back of Volume 1 refers). The Councils will not permit multiple residential developments within 'Local Environment' (i.e. 2 or more units). In addition, where the cumulative impact of single houses is such to be resulting in a piecemeal and haphazard proliferation of single housing, permission will not be forthcoming.	√	√	√	0	0	0	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on biodiversity, fauna and flora and landscape.
NE3: Protection of Trees The Council will encourage development proposals that enhance the landscape through positive management and additional planting of native trees. Proposals for development will not be permitted where it is considered that it will result in the destruction or significant damage to any tree, or stand of trees, which makes a significant contribution to the ecology, character or appearance of the area.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape.
NE4: River Swilly and Environs The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/ cycle access to the river.	√	√	√	√	√	0	√	0	0	0	√	√	√	√	0	0	0	0	0	0	0	√	√	√	√	Significant beneficial impacts focused on biodiversity, fauna and flora, population and human health and landscape.
NE5: Biodiversity The Planning Authority shall have regard to the established level of biodiversity identified in the map entitled 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.	√	√	√	0	0	0	√	0	0	0	√	√	√	0	0	0	0	0	0	0	0	√	√	√	√	Significant beneficial impacts focused on biodiversity, fauna and flora, material assets, cultural heritage and landscape.
NE6: Water Quality Management Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.	√	√	√	0	0	0	0	0	0	0	√	√	√	√	√	0	0	0	0	√	0	√	√	0	0	Significant beneficial impacts focused on biodiversity, fauna and flora, material assets, cultural heritage and landscape.
NE7: Protection of Archaeological Sites and Places Proposals for development which are likely to have an adverse impact, damage, interfere or destroy any recorded monuments and their setting and zones of archaeological potential will only be permitted where it can be clearly demonstrated that: a. An archaeological assessment has been conducted; and b. The scale and the quality of any proposed development or other material considerations outweigh the value of the remains in question; and c. Proposals for the conservation and management of archaeological resources have been included; and d. There will be no destruction of recorded monuments	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape.

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
NE8: Flood Risk Management The Council will pursue a managed risk approach to flooding in the Letterkenny area and will be guided by the precautionary principle. The development plan will: a. Direct development considered of 'high risk' to public safety, away from vulnerable locations; b. Specify the criteria against which new development will be managed within areas within the settlement boundary below the 6m contour line; c. Safeguard floodplain areas and low lying land within the town from inappropriate development and ensure, where possible, that they can flood naturally; d. Identify proposals for new flood protection measures where development occurs; e. To is to encourage the use of sustainable urban drainage systems (SUDS) in the management of surface water runoff in all new development.	O	O	√	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	√	O	O	√	O	O	
NE9: Flood Risk Assessment The Councils will manage flooding through the assessment of flood risk as follows: i. High Risk Exclusions: The Councils will direct developments considered of 'high risk' away from sites that fall below the 6m contour line (Malin OD) and will refuse applications for such proposals that fall within such areas. Proposals will be considered of high risk if they: a. Represent an unacceptable threat to public safety or public health, (for example, cannot be evacuated in an emergency, and constitute a risk to human life); or b. Are likely to cause unacceptable levels of pollution or contamination of flood waters if inundated. Examples of developments considered as 'high risk' would include, hospital, medical and emergency services; special care residential developments for the physically impaired or elderly; commercial developments that involve polluting or contaminating processes or materials e.g. sawmills, chemicals, acids, or fuel storage. Developments that if flooded would cause risk to others: for example electricity sub stations. ii. Managed Risk Proposals The Councils will seek to manage the threat from flooding for developments not considered as 'high risk'. Within this approach there is an acceptance of risk on the basis that developments must adopt appropriate protection and mitigation measures and have the potential to make a contribution to the improvement of floodwater management within the area at risk. Proposals will only be considered where it can be demonstrated that the development: a. Has been designed to minimise the risk of surface water inundation and will not contribute to or increase the risk of surface water flooding elsewhere; and b. Has adopted all reasonable measures to improve the management of flood waters on and adjacent to the site and to assist the protection of properties within the vicinity of the site; and c. Incorporates building design measures and materials to assist evacuation and minimise damage from inundation. iii. Supporting Information The Councils may request supporting information to substantiate the adequacy of design/mitigation proposals for development at risk, or likely to cause risk elsewhere. This information will normally be required in the form of a hydrological report which in addition to addressing the issues raised in paragraph (ii) above, may be required to include the following information: a. Indicate the location, route and destination of culverts, channels and storage areas to accommodate surface water discharge from the proposed site to a suitable outfall. b. Include surface water design calculations establishing the adequacy of the proposed surface water drainage between the site and the proposed outfall to facilitate the proposed development and that has cognisance to the 50-year storm. These details shall be accompanied by the result surface water network and proposed outfall; c. Include a programme of maintenance for the upkeep of storm water drainage and flood storage areas from the proposed site to the proposed outfall; d. Provide details of proposed uses of the development/structure below the 6m contour line. Only appropriate uses that would not adversely be affected by temporary inundation will be considered acceptable within areas considered to be at risk to flooding.	O	O	√	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	√	O	O	√	O	O	
NE10: Flood Defence Requirements Where development is proposed in proximity to the River Swilly or its tributaries, proposals shall clearly demonstrate: a. The preservation of an undeveloped 20m buffer on either embankment of the river Swilly and an undeveloped 10m buffer to either side of the major tributaries to the Swilly with public access reserved for emergency and service vehicles. b. The provision of additional storage areas to cater for the possibility of breaching or overtopping of the Swilly or tributary embankments.	O	O	√	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	√	O	O	√	O	O	
NE11: Surface Water Management Where it is considered that the existing surface water drainage may be unable to accommodate an additional discharge generated by proposed development(s), the Councils will require the submission of surface water design calculations establishing the suitability of drainage between the site and a suitable outfall. The Councils will promote and may require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the Councils will require the use of Sustainable Urban Drainage Systems is in relation to lands located within the Flood Risk Area identified on the Land Use Zoning Map excluding the Town Centre.	√	O	O	O	√	O	O	O	O	O	O	O	O	√	O	O	O	O	O	√	O	O	√	O	O	
NE12: Sustainable Building Practices. The Councils will encourage and support the use of renewable technologies and sustainable building practices in all residential and non-residential developments and actively facilitate the continual development of renewable technologies with regard to residential amenities and landscape sensitivities.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	√	√	√	O	√	O	O	O	√	√	Significant beneficial impacts focused on air, climate, noise and landscape.

Employment, Enterprise & Economic Development

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective: To act on and promote the designation of Letterkenny as a Linked Gateway with Derry in the NSS 2002-2020 and their strategic roles of attracting inward investment, enterprise and employment creation within the Northwest of Ireland.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To zone sufficient land to allow for the creation of employment, enterprise and the economic development of Letterkenny.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To promote the creation of sustainable employment within Letterkenny.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To create an efficient working environment with employees in mind, allowing for the provision of necessary day-to-day facilities and services.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To concentrate the service industry within the town centre and to promote the development of the town centre having regard to the Retail Strategy (Volume 2) and Town Centre Policies as set out in Part B, section 7.0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E1: Employment Location and Land Supply It is the policy of the Councils to zone land for the purposes of employment creation, economic development and enterprise. Proposed developments that will create sustained employment and economic benefit will be appropriate in the following land use zonings: - a. Lands zoned for general employment; and b. Lands zoned for commercial uses; and c. Land with established employment generating uses; and d. The Town Centre Consideration will also be given to proposals in areas other than those mentioned where it can be demonstrated that there are no other sites available within land zoned for employment generating development purposes that can accommodate the proposed development. Any development proposal of this nature should be in accordance with the other policies of this plan and should not affect the amenity of the area in which it is proposed.	0	0	√	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative affect in relation to the preference in the re-using of brownfield lands and regenerating the town centre in the general zoning of employment location and land supply.

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	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
E2: Developments in 'General Employment' zones. In land zoned for General Employment or extensions to existing employment generating development, proposals will be permitted provided that: - a. They are appropriate to the respective area in terms of size and the type of employment generating development to be provided; and b. They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network; c. They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and d. Comply with the Major Accidents Directive as set in Policy PI10. Proposals will also be considered for developments within the general employment zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to industry and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.	0	0	√	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in developments in general employment zones
E3: Other Uses On General Employment Land Designated general employment zones are primarily reserved for enterprise, general industrial and storage and distribution activities. Activities that do not fall within these categories will be considered in relation to their suitability to the location concerned, including the supply of available land. In the context of creating sustainable working environments, the Councils will also consider the use of General Employment lands to cater for the day-to-day need of working life, including cafés and childcare facilities and will support the creation of a vibrant business district. Proposals for development other than for business, commercial, general industrial, storage and distribution uses within identified general employment zones will only be considered where it can be clearly demonstrated that: a. They do not give rise to adverse environmental impacts; and b. They do not compromise the provision of a sufficient supply of general employment land for employment generating activities within the plan area; and c. Where the proposal is for retail uses they are ancillary to a permitted zoned use. d. Proposals for residential developments on land zoned general employment will not normally be permitted.	0	0	√	0	√	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre.
E4: Developments in 'Commercial' zones Lands zoned 'Commercial' within the plan have been designated as not being able to support industrial uses. These zones are more suited to commercial uses that generate employment but that are less intensive than industrial development proposals and are located along key arterial transport corridors, which are highly accessible. The Councils will support proposals that generate sustainable employment within these lands. The Councils do not view these lands as being capable of supporting heavy industries. All other employment creating development proposals within this zoning will be considered on the basis that: - a. They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network; b. They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and c. They will provide for a design and form that responds to the location of the lands as key landmark sites marking the commercial entrances into the form; and d. Comply with the Major Accidents Directive as set in Policy PI10. e. Provide for a proposed design that is of innovative architectural form in the context of the location of these lands at the entrance Gateways to the town. Proposals will also be considered for developments within the commercial zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to retail and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.	0	0	√	0	√	0	0	?	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in developments in commercial zones
E5: Home-Based Employment Proposals for development which involve change of use or new development for purposes of home-based employment will be permitted where it can be clearly demonstrated that: a. The proposal is of an appropriate scale for its location; and b. The proposal will not give rise to adverse visual aspects or negatively impact adjoining uses, traffic safety, and environmental or residential amenity.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	
E6: Tourism Related Development The Councils will promote and support the establishment of a new landmark visitor facility on lands by the banks of the River Swilly, within the identified Town Centre area. The proposal will be linked to the leisure and recreational development of the riverside area. Proposals for new or extended tourism related development elsewhere within Letterkenny will be permitted subject to: a. Integration with existing holiday/tourism facilities; and b. Access through a variety of means of transport; and c. Car parking proposed in accordance with the standards established in the Plan; and d. Safe vehicular access to and from the highway; and e. Adequacy of access roads for the likely levels of traffic generated by the proposal; and f. There will be no adverse impact to any conservation interest, heritage interest, landscape or residential amenity; and g. Appropriate design that takes into account size, scale and materials of existing facilities; and h. The submission of a management scheme for the maintenance of the overall development including roads, footpaths, open spaces and services.	0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population, human health and landscape.
E7: Visitor Accommodation Proposals for holiday accommodation, including touring caravan and camping sites, will in principle be supported throughout the plan area. Proposals for visitor accommodation will be permitted where they can clearly demonstrate: a. That the proposal does not give rise to adverse visual impacts, or negative impacts to traffic safety, environmental or residential	0	√	√	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
amenity; and b. Adequate landscaping measures to integrate the site into its setting; and c. Design and layout to make use of site topography and layout; and d. That the proposal does not prejudice existing provision or local amenity.																										proposals for holiday accommodation.
E8: E-Commerce It is the policy of the Councils to support E-Commerce as a sustainable source of employment. The Councils will aim to promote and improve the existing broadband infrastructure, which is key in the creation and sustainability of E-Commerce. The Councils recognise that E-Commerce may not necessarily require a shop frontage and as such would be sustainable in business parks and lands zoned for general employment. As such proposals for developments predominantly associated with e-commerce will be permitted provided that: - a. The proposal is of an appropriate scale for its location; and b. The proposal will not give rise to adverse environmental and transport effects or be prejudicial to residential amenity.	O	O	√	O	√	O	O	x	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in proposals for E commerce.
E9: Opportunity Sites The Opportunity Sites identified on the land use-zoning map offer a unique development opportunity by reason of their strategic location, scale, nature or current use. The planning frameworks set out for each 'Opportunity Site' on the following pages shall form a guide to the type of development that may be appropriate at each location. Any specific proposal that is not referred to in the planning frameworks shall be considered on their own merits subject to the constraints identified in the planning frameworks and subject to the proper planning and sustainable development of the area.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy E9.
OPP 1: Extension to Town Park at Gortlee: This site, bounded by the Town Park, DeValera, Ramelton and Gortlee Roads, and Whitethorn housing developments, comprises one of the few remaining significant woodlands within the town. The woodlands cover some 16ha of land stretching up to the Town Park. Within the woodlands there are a number of large open spaces, which are difficult to access. The site and the setting of Gortlee House are major environmental assets to the town. The Councils consider that this site has the potential to be sensitively developed for a mix of uses and the concept for developing the site will demonstrate the following elements: a. That the site is developed as a town park campus, retaining the substantive woodland cover of the site and providing for discrete pockets within which buildings can be introduced into an extended parkland setting; b. That pre- planning consultation be carried out with the Planning Authority; c. That the proposal provides for an extension of the existing town park linking through to Gortlee Road and providing for the conservation of the existing mature woodland cover with full public access. The substantive areas of new parkland space must be contiguous with and adjacent to the existing town park; d. The setting of Gortlee House is safeguarded when considered both within the confines of the site and from views into the site. In particular, no development will be permitted that curtails views to the house from the de Valera Road and from the junction of Gortlee and Ramelton Roads; e. Uses exclude mainstream retail, and are compatible with the environmental setting of the site: e.g. specialist residential, apartments, offices, tourism or institutional uses may be appropriate; f. A high standard of architectural quality is achieved throughout having regard to the nature of the site as an important landmark site. In addition, density within the site will be carefully considered having regard in particular to the heritage value of Gortlee House and the wooded nature of the site; g. Vehicular access to the development is achieved via a new access improvement on Gortlee Road, subject to engineering and road safety assessment. Proposals to access the site from De Valera Road will only be considered where a clear justification is demonstrated together with evidence of minimal impacts with the town park, and subject to adequate and appropriate engineering and road safety both within the site and outside the site. h. Pedestrian and cycle access will be required to link through the development connecting the Town Park, De Valera Road, Gortlee Road and the Whitethorn housing area. i. The public parkland areas are served by footway and cycleway access, street lighting and park furniture as required by the Town Councils and provided by the developer. The Councils will consider the adoption and maintenance of all public spaces and woodlands on the basis that title is transferred to the local authority at completion of the development.	√	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	x	√	Significant beneficial impacts focused on population and human health. Potential negative affect on natural and historic landscape.	
Opp 2: Gortlee This site is located along Gortlee Road where there is substantial residential development, the Church of the Irish Martyrs and a range of industrial and employment generating activities to the north of the site. This site presents an opportunity to integrate the conflicting uses of residential and General Employment by creating a buffer between the housing to the west and the General Employment to the East together with the development of the site as a neighbourhood centre supporting a mix of small local retail units and community services so as to enhance on the existing established neighbourhood amenities.	O	O	√	O	√	√	O	?	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in relation to developing this opportunity site
Opp 3: Donegal Creameries Site The Donegal Creameries site is located on the edge of an established residential area and adjacent to 'General Employment' land use and zoning. The location is a transitional area between differing land uses and therefore any development proposal must give consideration to the creation of a buffer between the 'Residential' and 'General Employment' lands and have due regard to the protection of residential amenities. Notwithstanding, it is recognised that existing uses on the site are long established in the form of Donegal Creameries retail store and garden centre facility, associated offices, car parking facilities and the disused factory building along the Ballyraine Road. The redevelopment of this brownfield site is supported by the Councils for commercial, residential, tourism/leisure and small-scale retail uses with a maximum of 500m ² for any neighbourhood shop. Pedestrian access to adjoining undeveloped lands will also be required.	O	O	√	√	√	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	Significant beneficial impacts focused on population and human health.

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Opp 4: Thorn Pier & Landing Stage The site, which has a frontage onto the Swilly, is within a number of environmental designations such as SAC, SPA and it is also within the flood zone and adjacent to zoned green space. Subject to the amenity considerations related to the above and to adequate access arrangements, infrastructure and community considerations, the site could be the subject of a carefully designed Waterfront Regeneration Project introducing a number of appropriate commercial tourism/leisure uses. The Council would welcome the submission of a detailed design brief in regard to the site.	?	√	√	O	O	O	O	O	O	O	?	O	O	?	O	O	O	O	O	O	O	√	?	O	√	Potential negative affects on biodiversity fauna and flora and water. Also a potential negative affect in relation to flood risk and developing areas in the flood plain.
Opp 5: Former Town Port The site occupies a prime gateway position into the town and has potential to represent a landmark development that reflects the Linked Gateway status of Letterkeny- Dery. At present, this gateway entrance is represented by the views of the art structure at Port roundabout, the tourist office building and also the Mount Errigal Hotel. Given the location of the site adjacent to the Swilly, proposals providing for commercial tourism/leisure facilities are considered appropriate. In this regard, development proposals shall demonstrate: a. That the proposal is of high architectural design including high quality internal and external specification, and that is of an architectural form that will represent a landmark quality structure at this key Gateway to the town. b. That the development addresses the river and integrates the river corridor into the design concept providing for public realm/ amenity space. c. That any proposal must make provision for flood alleviation and flood risk management in line with policies NE9, NE10 and NE11.	O	√	√	O	√	O	O	√	O	O	?	O	O	O	O	O	O	O	O	O	O	√	?	√	√	Significant beneficial impacts focused on material assets, cultural heritage and landscape. Potential negative impacts in relation to protecting and enhancing aquatic ecosystems and in relation to developing in flood plain
Opp 6: South of River Swilly The site is located south of the River Swilly. Proposals for redevelopment of these lands shall be required to consist of a detailed design concept that considers the integration of the proposed development with residential land (south) and town centre (north). In addition, the design concept shall: a. Demonstrate a range of uses in the areas of residential, apartments, tourism, offices and community uses. Mainstream town centre retail activities are excluded. In lieu, local neighbourhood retail activity serving residential development may be considered. b. Adequate provision of open space, public realm, pedestrian and cycle permeability. c. High quality architectural design d. Consideration of flood risk and associated mitigation measures having regard to the flood risk management policies contained in the plan. e. Consideration of further linkages and compatibility with residential lands south and the town centre north.	O	√	√	√	√	√	O	x	O	O	O	O	O	O	O	O	O	O	O	O	O	O	x	O	O	Significant beneficial impacts focused on population and human health. Potential negative affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre and in relation to developing on flood plain.
Opp 7: South of Swilly The lands in question are located to the south of the River Swilly and the 'Town Centre'. The lands adjoin the River Swilly and consist of an existing walled graveyard whilst a proposed new bridge and proposed road alignment traverse the site. Having regard to the environmental and infrastructural issues arising, a masterplan approach to the development of these lands will be required. The overriding objective of the masterplan is to ensure a balanced approach to the development of the lands in terms of the delivery of appropriate scale and built form set against the delivery of integrated and substantive open space proposals in the form of linkages, corridors and parkland space. Furthermore the masterplan will be required to include: a. A mix of uses that will exclude mainstream town centre retail activity but may include residential, apartments, offices, tourism or institutional uses. b. The adequate provision of public open space both along the river corridor and within the overall site that provides for a high quality environment where access and permeability are paramount. c. Open space provision within the masterplan area will accommodate a graveyard and pedestrian river crossing. d. The provision of adequate buffer areas around the existing walled graveyard in such a manner so as to protect the integrity, context and setting of the graveyard whilst incorporating the buffer area within an overall open space concept for the site. e. Consideration of flood risk and associated mitigation measures having regard to policies NE9, NE10 and NE11. f. Consideration for further linkages and compatibility with residential lands south. g. Integration of the road and bridge structures in a manner that makes provision for a design and engineering concept that shall cause the structures to contribute positively to the strategic location of the site, to the open space/public realm concepts and to the setting of the walled graveyard.	O	√	O	O	O	O	O	x	O	O	O	O	O	O	O	O	O	O	O	O	O	x	O	O	Potential negative affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre and in relation developing on flood plain.	
Opp 8: Oldtown Oldtown is well located in relation to the town centre, but is located within and adjacent to the Swilly Flood Buffer zone. This site represents an opportunity to provide a neighbourhood centre supporting some small local convenience retail, childcare and play facilities and other community services that would serve the Oldtown residential area.	O	O	√	O	√	O	O	?	O	O	O	O	O	x	O	O	O	O	O	O	O	O	x	O	O	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre. It also has potential negative affect in relation to developing on flood plain.
Opp 9: Lands at Crieve to the south of the River Swilly. This area of land at Crieve represents an opportunity to consolidate both the established Oldtown residential area to the immediate southeast and the town centre area to the north. The site is bounded by the river Swilly to the north giving rise to significant flooding implications as the site is located within the flood risk area and proposals for development must demonstrate adequate flood protection measures and that there will be no contribution to or increase in the risk of flooding elsewhere. In addition, the use of Sustainable Urban Drainage Systems must be considered as part of any proposal. Uses will exclude mainstream retail and only be permitted where they are compatible with the environmental setting of the site e.g. specialist residential, apartments, offices or tourism. Any proposal will have due regard to the route of relief roads.	O	O	√	√	√	O	O	x	O	O	O	O	O	O	O	O	O	O	O	O	O	x	O	O	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre. It also has potential negative affect in relation developing on flood plain.	

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Opp 10: Former Mart, Sentry Hill The site of the former mart is located in an area where education, religious and recreational facilities are clustered as well as a substantial level of high-density residential development. Having regard to the location of the site within walking distance of a range of community facilities and the town centre whilst having regard also to the significant associated car parking/traffic congestion, the former mart site would serve needs for social/affordable housing (particularly for the elderly in conjunction with the provision of an area for bus/coach parking for school and tourist use. In addition, any proposal for these lands will be required to reflect a high quality architectural design so as not to result in a negative affect to the character of the Cathedral 'Architectural Conservation Area'.	0	0	√	√	√	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health

Town Centre

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective: Achievement of a critical mass of retailers within the existing town centre, and the expansion of retail activities thereafter in an incremental fashion.	0	0	√	0	0	0	√	√	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: Provision for of a diversity of different retailing types (comparison and convenience) and sizes throughout the town centre.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Creation of an attractive retail environment in terms of overall design and the quality of the public realm.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Establishment of a strong and competitive retailing environment including a strong independent retailing sector.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Development of an integrated retail environment accessible by a range of transportation modes.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
TC 1: Adherence of Development Proposals to the Town Centre Strategy. All Development proposals shall demonstrate overall compliance with the town centre strategy detailed above. Proposals, which the Planning Authority consider would conflict with, or hinder the achievement of, this strategy, will not be permitted.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0	
TC2: Adherence of Development Proposals to the Urban Design Framework Overall Requirement: All Development Proposals, within the Town Centre shall adhere to the Urban Design Framework (Map 6 refers) accompanying this Development Plan in terms of; development forms/layouts, the provision of street frontages/active frontages, building setbacks, the protection of existing and the provision of new linkages, the development of open spaces (including positively addressing and incorporating adjacent areas of open space within development proposals). Requirements within the Town Centre West of the Isle Burn/Isle Lane: In the area West of the Isle Burn/Isle Lane the Urban Design Framework identifies specific development forms/layouts, and linkages, including exact development blocks, block arrangements, active frontages and internal roadways/linkages. In addition to the overall requirements detailed above development proposals in this area shall adhere to the specific requirements of the Urban Design Framework in this regard. Notwithstanding this the Planning Authority may consider large scale development proposals in this area, which provide for alternative layouts in terms of block arrangements, internal linkages etc provided that the development proposal: - Provides for a comparable grain of development in terms of the size of individual blocks. - Creates a strong urban form with buildings, streets and places of a human scale. - Provides for the creation of the key urban spaces identified in the framework. - Achieves a similar density of development. - Provides an equivalent level and quality of pedestrian permeability including providing for the major internal and external pedestrian linkages identified in the framework. - Otherwise meets the specific requirements of Urban Blocks 1-4 as identified in Policies 20-23 Requirements within the Town Centre East of the Isle Burn/Isle Lane and in Urban Block 5 In the area East of the Isle Burn/Isle Lane and in Urban Block 5 the Urban Design Framework identifies more general development areas/layouts and more approximate road linkages and building setbacks. This allows for a more flexible approach in view of the Greenfield nature of the area. Notwithstanding these more general requirements, development proposals in this area shall be expected to provide for: - The creation of distinct development blocks within an overall grid structure. - A fine grain block and plot size (with block edges not greater than 80m in length). - A strong urban form with buildings, streets and places of a human scale. - Street Frontages and Streetscape along both the linkages identified in the Urban Design Framework and the edges of the blocks created within/by specific development proposals. → Such frontages shall provide for buildings to front directly onto the street with building setbacks only in so far as to accommodate sufficient space for footpaths, cyclepaths, kerbside parallel parking and (where appropriate) small areas of private space fronting residential developments. In exceptional cases a greater building setback will be permitted to accommodate suitably landscaped public open space or variations in setback to promote visual interest. - An overall development density suitable for a town centre environment. - Quality pedestrian linkages within the development and between it and the adjoining development blocks. - Public spaces within larger development areas.	0	0	√	0	√	X	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0		

	Assessment of policies against environmental protection objectives																									
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Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
• Active frontages along key sections of the street frontage in accordance with TC17.																										
TC3: Mixed Use Development Policy in the area identified as the Traditional Town Centre. New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the traditional town centre shall demonstrate that the proposed usage shall not detract from the objective of creating a vibrant and mixed use town centre. In addition such uses shall be reflective of the development's/building's location within the town centre. Larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy TC3
TC4: Mixed Use Development Policy in areas other than the Traditional Town Centre. New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the area zoned town centre extension, shall provide for a diversity of uses within the development/building in question. In addition, larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy TC4
TC5: Design Criteria in the Town Centre Development proposals in the town centre shall only be permitted where they: • Provide for distinctive buildings of high architectural quality, which contribute to a distinct sense of place and a quality public realm. • Adhere to the building lines set out in the Urban Design Framework or where same is not identified adhere to the established building line. • Provide for a fine grain of development in terms of overall scale, fenestration size/proportions, and detailing. • Promote visual interest through modulation and detailing of architectural elements (e.g. variation in building elevations, variations in roof form, cornices, windows, eaves, frontages and entrances and minor variations in setback). • Provides for a minimum 3-storey development along the Pearse Road and 2 Storeys elsewhere in the town centre. • Avoids the use of industrial type cladding. • Avoids the use the cladding or glazing of extensive areas of the proposed development.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC5
TC6: The Ecclestial Quarter Architectural Conservation Area It is a policy of the Council to implement an Architectural Conservation Area, herein described as 'The Ecclesiastical Quarter ACA'. Accordingly it will implement the relevant policies at Part B, section 2.0.																										
TC7: Historic Streetscape It is the policy of the Councils to protect and enhance the quality of the 'Historic Streetscape' as identified on Map no. 6.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC 7
TC8: Shop fronts along the 'Historic Streetscape.' It is the policy of the Councils to: a. Ensure the retention of historic street-fronts as appropriate. b. Only approve alterations to existing historic shop fronts if the proposal is an improvement on what exists. Particular care will be taken over proposals for the installation of blinds, canopies, security grilles and shutters to avoid harm to the visual amenity of historic shopping streets, if acceptable in principle they must be designed as an integral part of the shop front design. c. Avoid pastiche shop fronts and facades. d. Encourage contemporary design resolution where appropriate avoiding cautious pastiche, considering security lighting and shutters, additional security measures as necessary, signage and advertisements.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC 8	
TC9: Traditional town centre It is the policy of the Councils to reinforce the traditional town centre as the heart of the town, to increase its vibrancy and improve its environment. (Map No. 5 Refers)	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC9
TC10: High quality sustainable vibrant town environment It is the policy of the Councils to ensure the traditional historic streetscape of Letterkenny is preserved and enhanced to create a high quality sustainable vibrant town environment.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC10
TC11: Promotion of attractive town centre It is the policy of the Councils to promote an attractive town centre atmosphere which would encourage additional trade and business to the traditional town centre encouraging increased footfall along the historic streetscape of the town.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC11
TC12: Improvement programme It is the policy of the Councils to initiate a programme encouraging ongoing improvement in street fronts in order to attract more quality businesses to Main Street.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC12
TC13: Management of 'Historic Streetscapes.' The Councils will manage the 'Historic Streetscape' (Map No 6 Refers) as follows: a. All restoration and development proposals within the 'Historic Streetscape' will respect the character of existing buildings, important views and spaces and historic settlement pattern in terms of scale, height, density, grouping, design and materials along the designated Historic Streetscape and always of the highest design quality. b. Existing historic buildings adding to the character of the streetscape should not be damaged or demolished. There is a presumption in favour of the retention of historic buildings. c. The Councils will promote the sensitive re-use of existing buildings and encourage quality repair and maintenance carried out with appropriate materials and to a high standard of workmanship. d. The Councils will seek to retain all original features which are important to the character of the buildings along the Historic Streetscape such as entrances, chimney stacks, doors, windows and materials. e. The Councils will ensure all development within the designated historic streetscape should reflect and interpret the specific character of the streets, responding to and reinforcing the townscape, landscape, scale materials and topography, and always of the highest quality regardless of the conceptual approach adopted. f. The Councils will reinforce the value and importance of the green spaces in the town and the natural topography of the area in relation to the protection, enhancement and promotion of the 'Historic streetscape.'	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC13	

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
g. All planning applications will be accompanied by a design statement clearly outlining the concept and design approach chosen in relation to the development of buildings and/or sites along the designated spine.																										
TC14: Landmark Buildings. Proposals for the development of new buildings or the redevelopment of existing buildings on the sites designated as Landmark sites on Urban Design Framework shall not be permitted unless they provide for a distinctive landmark building of high architectural merit in terms of design, character, materials and finishes.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC14
TC15: Protection of Short views and Prospects of Special Amenity Value. It is a policy of the Councils to protect the identified Views and Prospects of Special Amenity Value [Map No. 6 refers]. Developments, which obstruct, detract from or otherwise compromise the architectural character, setting, streetscape, or general visual harmony of the view in question, shall not be permitted	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	Significant beneficial impacts focused on landscape.
TC16: Protection/Enhancement of Key Linkages: Developments, which obstruct, narrow, physically encroach upon, otherwise restrict the safe use of the established or potential linkages identified in Map No 6: 'Urban Design Framework' shall not be permitted.	O	O	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	
TC17: Provision of Active Frontage within the Town Centre. New development proposals, or the redevelopment of existing properties, in areas determined or considered by the planning authority to be 'active frontage' in the Urban Design Framework (map no.6), shall provide for the creation of an attractive, high quality urban environment that promotes commercial vitality and pedestrian amenity: a. Developments are built to the building line identified on the urban design framework. b. Buildings create a human scale and visually engaging façade by: i. The modulation and detailing of architectural elements (e.g. minor changes in sets backs, variation in roof lines, entrances, window detailing). ii. Ensuring that building forms along street frontages are broken down into narrow horizontal distances, which create a human scale and maintain visual interest. iii. The avoidance of large expanses of blank walls, or frontages exclusively devoted to display. c. The development, in combination with existing and permitted development in the immediate vicinity, provides for the occupation of ground floor units by a variety and mix of active uses (e.g. Convenience & Comparison Stores, Cafés, Restaurants) directly accessible from the street through the provision of a range of different unit sizes. In larger developments smaller units shall be interspersed with larger units. d. Buildings shall provide a minimum of two full storeys of useable floorspace along the full street frontage of the site. e. Car parking/loading spaces along the street frontage, where appropriate, shall i. Be arranged parallel to the street frontage, ii. Not amount to more than 50% of the overall street frontage. iii. Be grouped with an equal length of free kerbside between each group. f. With the exception of on street parking described above car parking, manoeuvring and loading areas shall be located, where appropriate, to the rear of buildings. Where it is not physically possible or desirable to locate parking to the rear of buildings or where the provision of same would not adhere to Point g. Above, the developer shall be expected to provide a Financial Contribution to the shortfall in Car Parking in line with the Technical standards contained within this plan and the applicable Development Contribution Scheme.	O	O	√	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	Limited relationship between environmental protection objectives and policy TC17	
Policy TC18: Provision of Car Parking in the Town Centre New development proposals, including proposals for the redevelopment of existing developments shall adhere to the following requirements in relation to the arrangement/layouts of car parking, manoeuvring and loading spaces. - With the exception of on street parking provided in the manner described below, car parking manoeuvring and loading areas, where appropriate, shall be located to the rear of buildings, or through alternative appropriate internal parking arrangements (e.g. basement or multi-storey parking) which do not hinder the creation of strong street frontage. - Car parking/loading spaces provided along the road/street frontage (i.e. to the front of buildings) shall: → Be arranged parallel to the street frontage. → Not amount to more than 50% of the overall street frontage. → Be grouped with an equal length of free kerbside between each group. - Where it is not physically possible or desirable to locate parking in accordance with the above provisions, the developer shall be expected to provide a financial contribution to the shortfall in Car Parking in line with the Technical Standards contained within the plan and the applicable Development Contribution Scheme. - In primarily residential developments within the town centre a more flexible approach shall be taken to application of the above parking policy. However in such locations, developments shall be expected to employ appropriate alternative solutions (e.g. small areas of grouped parking, basement parking, courtyard parking etc) in order to achieve a strong urban form in the design of such developments.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	Limited relationship between environmental protection objectives and policy TC18
TC19: Location of Certain Types of Retail Development. Proposals for the development of new, the extension of existing, or the change of use of buildings to: Car Retailing Showrooms/Lots, Builders Merchants or large scale outlets predominately dedicated to the wholesale trade, will not be permitted within the area defined as the town centre in Map No. 5.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	x	O	O	Potential negative impact in relation to development on flood plain.
TC20: Town Centre Urban Block 1: (Opportunity Site 12 Main Street/Church Lane Backland Area) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth Preplanning discussions. Such proposals shall provide for a high quality mixed use town centre development with a range of retail unit sizes capable of accommodating higher order retail developments, centred upon a direct pedestrian linkage between Main Street, and the upper part of Church Lane (or alternatively Ard O'Donnell road) fronted and passively supervised by an active streetscape. In addition any development proposals should provide for: - A high quality element of public realm and streetscape within the development that is accessible and incorporates a mix of complementary uses. - A high architectural quality and a fine grain appearance (in terms of design, finishes and materials) throughout. - Development of a scale and architectural form that will not detract from the character and quality of the Cathedral Quarter or the Architectural Conservation Area.	O	O	√	√	O	O	O	√	O	O	O	O	O	O	O	O	O	O	√	O	O	?	O	O	Limited relationship between environmental protection objectives and policy TC 20. Potential negative affect in relation developing on flood plain.	

Assessment of policies against environmental protection objectives																										
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
- The protection of uninterrupted views of the Cathedral from all vantage points in the plan area. - The protection, in so far as possible, of the residential amenities of the adjoining established residential areas. - Detailed assessment of and proposals for vehicular access, traffic management, parking and loading. A car-parking shortfall will be permitted for the non-residential elements of the development where it can be demonstrated that adequate alternative car parking provision exists within the town centre and can be easily accessed from the site.																										
TC21: Town Centre Urban Block 2: (Opportunity Site 13 Cultural/Recreational/Public Administration Quarter) Proposals for the Development/Redevelopment of the site shall contribute to the creation of a Civic/Cultural/Recreational Quarter and shall be for civic/public administration, arts, or tourism uses. The Planning Authority may also consider commercial uses such as proposals for the evening economy where they are compatible with the overall vision for the quarter. In addition any development proposals shall provide for: - Innovative and high quality architectural design and a quality public realm in terms of building design and ancillary public spaces. - Adequate accessibility and permeability in terms of walking and cycling, to the site and to the adjoining civic/public amenities.	O	O	√	√	O	O	O	√	O	O	O	O	O	O	O	O	O	O	√	O	O	√	?	O	O	Potential negative affect in relation developing on flood plain.
TC22: Town Centre Urban Block 3: (Opportunity Site 14) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions, and designed to provide a pedestrianised mixed use, civic quarter with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for: - A high quality pedestrian street with appropriate hard and soft landscaping treatments, lighting and street furniture along the axis shown in the Urban Design Framework. - High qualify pedestrian linkages, with appropriate landscaping, lighting and street furniture between the site and retail developments to the southeast and southwest along the indicative lines shown on the Urban Design Framework. - High Quality Active Street Frontages in accordance with Policy TC17 along the frontages designated as 'Active Frontages' in the urban design framework. - A civic square or similar publically accessible open space with appropriate hard and soft landscaping elements and incorporating a artistic landmark feature. - Public Toilets located adjacent to the civic square identified above.	O	O	√	O	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Limited relationship between environmental protection objectives and policy TC 22. Potential negative affect in relation developing on flood plain.
TC23: Town Centre Urban Block 4: (Opportunity Site 15) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan based on in-depth preplanning discussions, and designed to provide a mixed use, urban environment with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for: - A mixed-use urban environment with provision for a mix of retail units capable of providing both larger former higher order retail development and smaller retail units. - Building Setbacks in line with the setbacks identified on the Urban Design Framework for 'Railway Place' and the Linear Park. - A distinctive landmark building on the corner site at the north western and north eastern extremities of the site in line Policy TC14. - Continuous Active Frontages along the lines identified in the Urban Design Framework and in accordance with Policy TC 17. - The subdivision of the block between the Linear Park and the Paddy Harte Loop Road to provide key pedestrian linkages in accordance with the Urban Design Framework. - Specific hard and soft landscaping proposals on both the Linear Park and Inner public space identified in the Urban Design Framework. - Specific proposals for the 'Railway Place' including: → Hard and soft landscaping features such as street furniture, lighting, green areas, bicycle-parking provision etc. → The identification of vehicular and pedestrian spaces (including sufficient definition between same), and pedestrian crossing points.	O	O	√	√	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Potential negative affect in relation developing on flood plain.
TC24: Town Centre Urban Block 5: (Opportunity Site 16) Proposals for the development/redevelopment of this site shall be subject to a detailed masterplan based on in-depth preplanning discussions and designed to provide mixed-use urban environment with a superior architectural quality and a high quality public realm. In particular development proposal(s) should provide for: - A building layout which: → Screens and softens the visual impact of the retail warehousing directly to the north (when viewed from the southern slopes of the Swilly), whilst maintaining the service access to the rear of same. → Fronts, positively addresses and sensitively integrates the riverside park along the River Swilly in any design proposals. - A significant degree of residential development fronting the banks of the river Swilly. - The Key linkages (both to and within the site) identified in the Urban Design Framework. - High quality, public open space(s), passively supervised by the surrounding development with a minimum of car parking along its edges. - The avoidance of large areas of surface car parking. - The Retention of the mature trees situated at the southern extremity of the site on the northern bank of the Swilly and the incorporation of same into any overall landscaping proposals.	O	O	√	√	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Potential negative affect in relation developing on flood plain.	

Retailing

	Assessment of policies against environmental protection objectives																										
	B		P				S				W					A						M		L			
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment	
RT1: Retail Proposals and the Retail Strategy: Proposals for retail developments shall be considered in accordance with the amended objectives, frameworks and associated policies of the Retail Strategy contained in Volume 2 of this plan.	0	0	√	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0		
RT2 Policy RT2: Location of Retail Development: Proposals for retail development shall be subject to the sequential test whereby: - The area defined as the Town Centre (See Map 5: Town Centre Strategy) is the preferred location for Retail Development. - Retail Development outside the Town Centre will only be permitted where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within the Town Centre - If no development opportunities are available within the Town Centre, then the next preference shall be a location on the Edge of the Town Centre - Retail Development will then only be permitted outside of the Town Centre and Edge of Town Centre areas where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within same. - In addition to the above where a case is made for retail development outside of the Town Centre developers will be required to demonstrate that: → There is a demand for additional retail provision. → The development will not negatively impact on the existing standard of retailing or the overall vitality and viability of the defined Town Centre. The Council will seek a formal Retail Impact Assessment in circumstances where it is considered that the development might have a potential adverse impact. → The development can be accommodated at the specific location without contributing to ad hoc or haphazard development form or significantly hindering the capacity of the town to develop a compact urban form. → The development will be serviced by existing or proposed public transport links and will be easily accessible (in terms of distance and quality of linkages) from the town centre by both pedestrians and cyclists. → The development will be adequately serviced by existing infrastructure networks including roads, water, telecommunications, sewerage etc.	0	0	√	√	0	?	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0		
RT3: General Criteria for Retail Developments: Proposals for retail development will only be permitted where they: - Comply with the sequential approach outlined in the Retail Planning Guidelines and the locational Policies for Retail Development contained within this plan. - Provide safe and easy access to/from the development by pedestrians, cyclists and disabled persons. In particular large-scale retail developments shall demonstrate that they can be serviced by existing or proposed public transport links, local, regional and national. - Comply with the car and bicycle-parking standards contained within Volume 2 of this Development Plan. - Are of a high design standard and satisfactorily integrate with the surrounding built environment and comply with the built environment policies contained with this plan. - Do not negatively impact upon the flow of vehicular traffic in either the immediate vicinity of the development or in the wider area. - Provide adequate arrangements for the collection, attenuation, and discharge of surface water and otherwise comply with the Flood Prevention Policies contained within this plan.	0	0	√	√	√	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
RT4: Neighbourhood Retail Outlets Proposals for neighbourhood retail outlets, of up to 300m² in size (this size restriction includes public retail floorspace space, and excludes storage areas and ancillary facilities) or extensions of less than 50% to an existing shop, which are intended to primarily serve a neighbourhood need..	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy RT4
RT5: Ancillary Retailing Development proposals for ancillary retail development, (i.e. retail developments ancillary to Industrial, Light manufacturing, and Service type activities) outside of the defined Town Centre will only be permitted where such retailing operations are ancillary to the business as a whole. The size of the retail space shall not exceed more that 10% of the total indoor space of the business in question.	0	0	√	0	√	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy RT5

Transport & Movement

	Assessment of policies against environmental protection objectives																									
	B		P				S				W					A						M		L		
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment
Objective: To analyse land use and transport in a coordinated manner.	0	0	0	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0	
Objective: To provide for a coordinated and planned linked transport network.	0	0	0	√	√	√	0	0	0	0	0	0	0	0	0	√	√	√	√	√	√	0	0	0	0	
Objective; To support and promote improved regional access.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: To improve traffic congestion throughout the town particularly in the town centre.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: To promote, support and encourage modal shift to walking and cycling	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0	
T1: Letterkenney Integrated Land Use & Transportation Strategy	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts

[illegible]

[illegible]

- [illegible]

Physical Infrastructure

	Assessment of policies against environmental protection objectives																										
	B		P				S				W					A						M		L			
Policy	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2	Comment	
Objective: To co-ordinate growth nodes in the town with the delivery of key physical infrastructural projects.	0	0	0	√	√	0	√	0	0	√	√	√	√	√	√	√	√	√	√	0	0	0	0	0	0	0	
Objective: To ensure that existing and planned physical infrastructure is adequate to cater for the future growth of the linked gateway.	0	0	0	√	√	0	√	0	0	√	√	√	√	√	√	√	√	√	√	0	0	0	0	0	0	0	
Objective: To achieve the eradication of environmental pollution as a result of inadequate physical infrastructure.	√	0	√	√	√	√	0	0	√	√	√	√	√	√	√	√	√	√	√	0	0	√	0	0	0	0	
PI1: Power Provision The Councils will collaborate in the work of Bord Gais and ESB, to identify suitable corridors for conveyance of gas and electricity infrastructure. Where such corridors are identified, the Council will not permit developments which compromise their ability to be used for the conveyance of piped gas lines or overhead cables.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI1
PI2: Location of Electricity Power Lines In light of the quality of the environment around parts of Letterkenny, such as Gortlee, Rodgers Burn and particularly Kiltroy and the Swilly environs, the Council will enter into discussions with ESB to ensure that, where practicable, power lines be routed underground.	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape	
PI3: Telecommunications The Council will continue to work with the telecommunications industry to develop and extend the broadband infrastructure servicing Letterkenny to ensure the availability of up-to-date facilities.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI3
PI4: Erection of telecommunication facilities Proposals for the erection of masts, antennae or ancillary equipment shall be required to accord with the following: a. To provide an orderly development of the telecommunications infrastructure throughout the Letterkenny area, in accordance with the requirements of the ‘Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities - 1996’; and, b. To adopt a presumption against the erection of antenna in proximity to residential areas, schools or community facilities, due to the potential of public health risks.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI4
PI5: Water supply The Councils will seek to provide adequate and sufficient water supply in order to meet current capacity requirements together with future projected need. Proposals that cannot demonstrate that an adequate water supply can be achieved will not be permitted.	0	0	√	0	√	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	√	0	0	0	0	Significant beneficial impacts focused on water.
PI6: Wastewater Services The Councils will seek to provide adequate and sufficient wastewater treatment in order to meet current capacity requirements together with future projected need and to eradicate environmental threats.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
PI7: Groundwater Source Protection The Councils will seek to ensure that potable water sources are protected and to avoid contamination of groundwater sources. Therefore, proposals for on site treatment and disposal of wastewater shall not be permitted.	0	0	√	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	√	0	0	0	0	Significant beneficial impacts focused on water.
PI8: Waste Management The Councils are committed to reducing waste consigned to landfill sites by promoting waste minimisation and recycling and supporting the ongoing work of Letterkenny Tidy Towns Committee together with the implementation of the Waste Management Plan 2006-2010.	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI 8
PI9: Renewable Energy The Councils will encourage alternative and renewable energy sources in an effort to achieve Ireland’s obligations under the Kyoto Treaty, which aims to limit greenhouse gas emissions to 13% above 1990 levels in the period 2008-2012.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	√	√	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on air, climate and noise.
PI10: Accidents Directive Proposals for new developments or modifications of existing uses to those listed in Table 1 Schedule 8 of the Planning & Development Regulations 2001, shall not be located within the stated distances from the specified establishments set out in Table 2 of the said regulations.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI10
PI11: Surface Water Management The Councils will promote and will require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the use of SUDS will be required will be at locations within the flood risk area identified on the land use zoning map, excluding the town centre. This policy will be reviewed on completion of a ‘Flooding Study’ that is being commissioned in partnership between the Councils and the Office of Public Works.	0	0	0	0	√	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy PI11

9.0 Mitigation

A number of mitigating measures have been developed within the policy framework in order to redress potentially negative impacts on the environment. The significant issues that have resulted in the need for mitigation measures are set out in the table below. It is noted that this plan represents a refinement of previous plans and that mitigation is primarily channelled through the need to seek quality within the Gateway. It is also noted that further mitigation measures are likely to be developed within the life of this plan arising from the work outputs of the 'Flooding Study' and the 'Integrated Land Use and Transportation Study.'

Significant issues	Mitigation
The substantial amount of Greenfield land that is zoned for 'primarily residential' development and the associated potential impacts on the environment, dispersal of residential areas, quality of life, landscape, air quality.	To mitigate against the potential negative effects, the policy places emphasis on the need to develop quality residential areas through design processes. Specifically, the following policies have been developed: (i) A neighbourhood approach to the development of new residential areas is set out in the plan that assesses each emerging new neighbourhood and gives information on the likely level of neighbourhood facilities that would be required in the event that the neighbourhood develops to full capacity. This neighbourhood approach and policies N1, N2 and N3 provide the environment to consider new proposals on residential land within the context of developing sustainable integrated residential areas and therein redressing the possible negative effects on quality of life indicators. (ii) Policies H6-H20 have been developed in order to ensure that new residential areas on Greenfield lands is managed in order to achieve high ranking in terms of sustainability indicators. Specifically the

Significant issues	Mitigation
	policy deals with layout and design of new development in their wider context of neighbourhoods and in relation to the qualitative standards and specifications for new units. This includes the roll out of design briefs and the preparation of design statements and concept proposals. (iii) The Childcare Strategy, contained in Volume 2 of the plan mitigates against the effects of creating large new populations in the environs of the plan area by requiring the integration of childcare facilities within new housing areas.
A substantial amount of land is zoned 'Strategic Residential Reserve' within the plan area and is noted as inherited zoned lands from previous plans. Effects relate to potential for dispersed residential development.	Policy H4 has been developed so as to mitigate against the release of land for residential purposes in a sporadic and dispersed, unsustainable manner. Policy H4 firmly establishes the purposes of SRR lands as a long term strategic housing landbank and provides a framework for the release of these lands by means only of an evidenced led approach, managed through the Variation processes of the Planning Acts.
Effects on the landscape setting of the town particularly in the environs area.	Having regard to the significant land mass in the environs of the town together with the landscape quality of much of the lands, the plan provides mitigation in 3 ways: i. Identification of lands as 'local environment' and therein not providing for high density development of urban form. ii. Quality standards in relation to layout and design of new residential areas. iii. Policy NE5 in relation to biodiversity and policy NE3 in relation to the protection trees.

Significant issues	Mitigation
Effects on built heritage of the town including loss of important built heritage.	The plan recognises the wealth of important built heritage in the town in its cumulative form that provides an attractive set of streetscapes and townscapes. To mitigate against the pressure for removal or alteration of these important buildings in an inappropriate manner, the plan sets out a series of policies that are aimed at guiding new development in a manner that is complimentary to the important built heritage as exists and that recognises the contribution of built heritage in developing an attractive Gateway city for people to live in, to invest in and to visit. Specifically policies N4- N16 refer.
Loss of biodiversity, habitats, species at European protected sites.	To mitigate against any negative effects of new development on European protected sites, Policy NE1 has been developed so as to regulate the encroachment of development on these environmentally important sites and to endorse the EU designation in the first instance.
Loss of biodiversity, habitat, species in general terms within the plan area.	To mitigate against loss of biodiversity and environmental impacts on the more sensitive areas of Letterkenny, policies NE4 and NE5 have been developed to ensure that development proposals do not detract from important biodiversity features.
Impacts arising from flood risk.	To mitigate against the effects of flooding, a managed approach to developments within the flood risk area has been developed in recognition that the flood plain is generally identified as an area of development potential. Policies NE8, 9 and 10 refer.

10.0 Monitoring

Article 14J (1) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 requires monitoring of the significant environmental effects of the implementation of plans “in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.”

The purpose of monitoring is to cross check significant environmental effects, which arise during the implementation stage against those predicted during the plan preparation stage. Monitoring of the implementation of the Letterkenny and Environs Development Plan shall be focused on the following indicators, which have been identified and established throughout the course of this SEA in accordance with the SEA Guidelines.

The process of monitoring shall begin after the plan is adopted and shall continue over the period of the plan. The statutory Managers Progress Report is to be prepared 2 years after the adoption of the plan (Section 15(2) of the Planning and Development Act 2000); it is anticipated that the environmental indicators set out below will be used to monitor the environmental impacts of the plan and be presented in the context of this 2 year review. The monitoring results shall subsequently be used in the compilation of a baseline study in the normal review of the plan.

The monitoring element of the plan is considered to be a critical phase in the life of the plan. In this regard, the Letterkenny & Environs Development Plan is very much an implementation plan which will be used both in the determination of planning applications but furthermore in developing programmes for the integrated delivery of quality urban environments.

Nature of impact/subject area	Monitoring measure
Loss of biodiversity flora and fauna/deterioration in habitat quality	Continued monitoring of Biodiversity within the Plan area; based upon the baseline Biodiversity work as detailed in the 'Biodiversity Study'. Particular emphasis to be placed on the monitoring of areas identified as areas of special biodiversity importance.
Quality of life/human health	• Annual record of new neighbourhood facilities constructed. • Data indicators to be developed through the forthcoming 'Integrated land use and Transportation Study' (e.g. journey to work time, trip generations, access to public transport). • Collation of data on access (walking and cycling) to neighbourhood facilities within the category of neighbourhood shop, childcare, education, parkland, public transport, health facilities.
Landscape change	• Annual record of number of new commercial/employment units permitted. • Annual collation of data on new housing densities permitted within 'primarily residential' zones. • Annual update of existing land uses within the wider plan area and associated land use change. • Annual update of existing land uses within the town centre and associated land use change. • Annual housing monitor (number of units permitted, number of commencements, number of completions). • Annual assessment of per year uptake of zoned lands.

Nature of impact/subject area	Monitoring measure
Air quality	Continued collation of EPA air quality monitoring data.
Water quality	- Continued collation of EPA water quality data. - Collation of results of water quality monitoring carried out by Donegal County Council.
Flooding	- Continued collation of recorded floods within the plan area. - Data indicators to be developed via the forthcoming 'flood study' and monitored at regular intervals.
Material assets	- Record known loss and or damage of protected sites or structures within the Plan area. - Collate number of new additions to RPS

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**SECTION 11.0 Screening in respect of Appropriate Assessment of the
draft Letterkenny & Environs Development Plan 2009-
2015**

**In line with the requirements of Article 6 (3) of the EU
Habitats Directive (Directive 92/43/EEC)**

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11.1: Introduction

11.1.1 Background

This document fulfils the requirements of the EU Habitats Directive (Directive 92/43/EEC) in respect of the **screening for Appropriate Assessment** (AA) of the draft Letterkenny & Environs Development Plan 2009- 2015). The purpose of the screening exercise is to identify the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination and consider whether these impacts are likely to be significant.

Natura 2000 sites are protected habitats for flora and fauna of European importance and comprise Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive.

The Habitats Directive requires that any draft land use plan must be screened for any potential impact on areas designated as Natura 2000 sites. Specifically, article 6(3) states:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the sites conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

11.1.2 Methodology

The screening for AA in respect of the draft Letterkenny Plan 2009- 2015 has been prepared in line with the 'Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC', European Commission, 2001.

The Methodological Guidance outlines four steps in the AA process as follows:

- Stage 1: Screening (The purpose of this document).
The process, which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
- Stage 2: Appropriate Assessment
The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the sites structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.
- Stage 3: Assessment of alternative solutions
The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.
An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

11.1.3 Identification of Natura 2000 sites that may be affected.

There are two Natura 2000 sites that are in part located within the plan area of the draft Letterkenny & Environs Development Plan 2009- 2015 and part located outside the plan area. These are shown on the map below. The sites are as follows:

- Lough Swilly Special Area of Conservation (Site code 002287).
- Lough Swilly Special Protection Area (Site code 004075).



11.2. Screening

11.2.1 Introduction

This section sets out the actual screening exercise for the purposes of AA. The Methodological Guidance outlines four sub- steps within the screening exercise as follows:

1. Determining whether the project or plan is directly connected with or necessary to the management of the site;
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 site;
3. Identifying the potential effects on the Natura 2000 site;
4. Assessing the significance of any effects on the Natura 2000 site.

Each sub- step is now considered in the following pages.

11.2.2 Is the project or plan directly connected with or necessary to the management of the Natura 2000 sites? (Step 1)

The Methodological Guidance outlines that for a project or plan to be 'directly connected with or necessary to the management of the site', the 'management' component must refer to management measures that are for conservation purposes, and the 'directly' element refers to measures that are solely conceived for the conservation management of a site and not direct or indirect consequences of other activities. The draft Letterkenny & Environs Development Plan consists of objectives in relation to the natural environment including conservation but it is not directly or indirectly prepared for the purpose of the conservation management of the identified Natura 2000 sites.

11.2.3 Describe the project or plan and describe and characterise other projects or plans that in combination have the potential for having significant effects on the Natura 2000 sites (Step 2) and identify the potential effects on the Natura 2000 sites (step 3).

This section examines the various elements/parameters of the plan so as to assist in the understanding of potential impacts. Where an element/ parameter results in a potential impact on the Natura 2000 sites, these are noted.

(i) Description of the content of the plan:

The draft Letterkenny & Environs Development Plan is a statement of policy that sets a framework for the future growth of Letterkenny over the period 2009- 2015. In particular the role of the development plan, is to set out a vision and growth strategy for the town, to identify areas and zones that are suitable for development, to set out policies that will guide the manner in which development is carried out and to clarify proposals including planned projects in the area. The plan area comprises some 2482 hectares of land mass and the population in 2006, within the plan area, was estimated at 19,363. The town is identified as a linked Gateway with Derry city and is therefore to be an engine of growth for the region in terms of critical mass and all associated attributes such as economic development, retail activity, entertainment and education as examples.

The growth strategy adopted in the plan is one of achieving the 'Sustainable Development of the Gateway.' The key characteristics of this growth strategy are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental resources.
- Quality of urban form.
- Vitality of services.

The overarching aim of the plan is:

To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social and cultural activities.

The strategic objectives of the plan are as follows:

1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.
4. To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.
5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

Specifically and directly in relation to lands abutting the Natura 2000 sites, the draft plan provides the following policy context that may result in potential impacts on the Natura 2000 sites:

- The protection of Natura 2000 sites by zoning of the areas (only those lands that fall within the plan boundary) as 'SPA, NHA, SAC and associated adjoining lands' the policy of which is as follows:
'Lands identified as SAC, SPA, NHA and associated adjoining lands on the land use zoning map have been designated as such under European and National Legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all the following criteria can be met:
 - a) There is significant and identifiable public interest in doing so; and*
 - b) There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation; and*
 - c) The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and*
 - d) Adequate mitigation measures are put in place.'*

Potential impact: Minimal to zero interference at Natura 2000 sites.

- The identification of lands as 'open space' along the river corridor and adjoining the Natura 2000 sites.

Potential impact: Minimal to zero interference at Natura 2000 sites.

- The provision of policy NE4: River Swilly & Environs which states as follows: *'The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/ cycle access to the river.'*

Potential impact: Minimal to zero interference at the Natura 2000 sites in terms of built form. Potential loss of habitat as a result of construction of pathways and human erosion.

- The provision of policy NE5: Biodiversity which states as follows: *'The Planning Authority shall have regard to the established level of biodiversity identified in Map No. 1 contained in Volume 3, Environmental Report, 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.'*

Potential impact: Minimal to zero interference at Natura 2000 sites.

- The provision of policy NE6: Water Quality Management which states as follows: *'Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.'*

Potential impact: Protection of the integrity of the Natura 2000 sites.

(ii) Plan sector:

The draft Letterkenny & Environs Development Plan is a spatial land use plan prepared under the provisions of the Planning & Development Acts 2000- 2007.

Potential impacts: This plan does not provide for the implementation of activities or conservation measures within the Natura 2000 sites.

(iii) Physical changes that will flow from the plan:

The plan aims to facilitate new growth in the town. New development is likely to involve excavation and / or ground preparation works to varying degrees dependant on the topography of each development site.

Potential impacts: The plan guides new development to locations outside of the Natura 2000 sites therefore there is not likely to be a potential impact on the Natura 2000 sites.

(iv) Resource requirements:

- The new development envisaged by the plan will require water abstraction for the purposes of adequate water supply. Current water supply is provided through abstraction from Lough Salt and Lough Keel of 9MLD. Additional supply will be provided through a number of schemes, the most significant of which is the Letterkenny/Lough Mourne scheme that will secure medium/long term needs.

Potential impacts: There is not likely to be a potential impact on the Natura 2000 sites.

- The new development envisaged by the plan will require the uptake of land that is currently undeveloped/ Greenfield. The types of landscapes that will be required as a resource are wide ranging from semi- urban area to undeveloped rural lands. Undeveloped lands consist of agricultural lands from pasture fields with linear hedgerow boundaries and tree lines to small areas of tillage fields. The plan does however, identify lands that are not deemed to be suitable for development proposals and as such the plan places zoning protections/ limitations/requirements on these important sites.

Potential impacts: Uptake of land for development purposes is to be guided to locations outside of the Natura 2000 sites therefore there is not likely to be a potential impact.

(v) Emissions and waste:

- The new development envisaged by the development plan has the potential to impact on air quality in the area as increased urbanisation is likely to result in increased vehicular movement (both private car and public transport).

Potential impact: There are likely to be impacts on air quality in the plan area and at the Natura 2000 sites but in conjunction with the plan strategy and policies to increase sustainable modes of transport (walking cycling/ public transport), the effects are anticipated to be neutral.

- The new development envisaged by the development plan will result in increased loadings to the Wastewater Treatment Works. The existing Letterkenny Sewerage Treatment Works is of insufficient capacity to cater for the new growth anticipated. As a result, the plan supports the upgrade of the

WWTW's to provide for appropriate treatment for Letterkenny to the size of 40,000PE. This scheme is due for commencement of contract during 2009.

Potential impact: The impact associated with the existing WWTW's capacity is likely to negatively affect the water quality status of the Natura 2000 site in relation to the risk categories identified under the Water Framework Directive. It is noted that a scheme to upgrade the WWTW's to redress this deficiency is well advanced and therefore it is anticipated that there will be improvement in relation to the risk categories under the WFD.

(vi) Transportation requirements:

- A number of transportation proposals are contained within the plan comprising new road building and including a number of bridge crossings. The potential impacts arising from these projects involve the uptake of currently undeveloped land, excavation works, ground preparation works such as piling where appropriate and removal/ segregation of natural habitats.

Potential impact: The proposals are generally located outside the Natura 2000 sites and therefore it is not anticipated that there will be identifiable impacts.

- The plan envisages growth in alternative and sustainable transportation modes in the form of walking, cycling and bus services. The potential impacts arising involve the construction of necessary infrastructure such as pathways, cycleways, quality bus corridors that will result in uptake of lands, albeit integrated into already existing urban areas.

Potential impact: The proposals are generally located outside the Natura 2000 sites and therefore it is not anticipated that there will be identifiable impacts.

(vii) Plan implementation period/duration of construction:

The life of the plan is 6 years during the period 2009-2015. The plan will provide the land use framework through which development proposals will be guided and advanced therefore construction will be ongoing.

Potential impacts: No potential impacts.

(viii) Distance from Natura 2000 site or key features of the site:

- The two sites identified (Lough Swilly SAC 002287 and Lough Swilly SPA 004075) partly abut the plan area on the eastern side of Letterkenny and are in part located within the plan area forming the River Swilly, designated up to Magheranan (SPA) and to the Polestar Roundabout (SAC).

Potential impacts: A small area of the Natura 2000 sites are located within the plan area therefore the potential impacts in terms of all the conservation objectives of the Natura 2000 sites, is reduced. It is noted that at low tide, extensive sand and mud flats are exposed especially at the mouths of the Swilly and Lennan Rivers.

- The following site synopsis are sourced from www.npws.ie and set out the detail of each site. In addition, target notes in respect of the areas located within the draft plan boundary are sourced from the 'Biodiversity Assessment Study of Letterkenny & Environs' May 2008, prepared by Catherine Storey, GlásEnviros Teoranta on behalf of Letterkenny Town Council and Donegal County Council.

Lough Swilly Special Area of Conservation (Site code 002287):

This large site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly. It extends from below Letterkenny to just north of Buncrana. Lough Swilly is a long sea-lough, cutting through a variety of metamorphic rocks on the west side of Inishowen.

The site is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site are the Swilly,

Lennan and Crana. At low tide, extensive sand and mud flats are exposed, especially at the mouths of the Swilly and Lennan rivers. Bivalves and polychaete worms are well represented in the macro-invertebrate fauna, with species such as Cockles (*Cerastoderma edule*), Mussels (*Mytilus edulis*), Baltic Tellin (*Macoma balthica*), Ragworm (*Nereis diversicolor*) and Sand Mason (*Lanice conchilega*) being common. Cord-grass (*Spartina anglica*) is well established on parts of the intertidal flats. The shoreline above the flats varies from bedrock shore to shingle or cobbles, and here is found a scattering of salt tolerant plants such as Scurvygrass (*Cochlearia officinalis*), Sea Milkwort (*Glaux maritima*) and Red Fescue (*Festuca rubra*).

Salt marshes are well represented in the inner sheltered areas of the site, with good examples in the Ramelton area. The marshes are the Atlantic salt meadow type, and are characterised by such species as Thrift (*Armeria maritima*), Sea Milkwort (*Glaux maritima*), Sea Aster (*Aster tripolium*), Sea Arrowgrass (*Triglochin maritima*) and Red Fescue (*Festuca rubra*).

Lakes, which are lagoonal in character, occur at Inch and Blanket Nook. Inch Lough is a good example of a large, shallow lagoon with very low salinity in most of the lagoon. Less information is available for Blanket Nook but it is of a higher salinity and adds to the richness of the habitat within the site as a whole. The vegetation in Inch is diverse and typically lagoonal, with well developed charophyte communities, including a large population of *Chara canescens* (a Red Data Book species). It also supports Horned Pondweed (*Zannichellia palustris*) and a mixed Pondweed/Tassleweed Community (*Potamogeton pectinatus*/*Ruppia maritima*). The green alga *Chaetomorpha linum* occurs at Blanket Nook. The aquatic fauna at Inch is rich and diverse and includes a range of lagoonal specialists and species that are apparently rare. These include *Lekanesphaera hookeri*, *Palaemonetes varians*, *Conopeum seurati*, *Sigara stagnalis*, *S. concinna*, *Jaera nordmanni*, *Neomysis integer* and *Cordyllophora caspia*. Less information is available on the aquatic fauna at Blanket Nook, though several lagoonal specialists have been recorded, including *Jaera ischiosetosa*, which appears to be a rare species in Ireland. Inch Lough is regarded as of significant conservation value for ectonal Coleoptera, with several species indicative of well-developed shoreline habitats including two that are apparently rare: *Bembidion bipunctatum*, a halotolerant shore species, and *Bembidion aeneum*, a stenotopic halobiont species. Although artificial in origin, the lagoon habitat in this site is one of the largest and best examples of a shallow, low salinity lagoon habitat in the country.

Two woodlands occur adjacent to the north-western shore of Lough Swilly. These are Rathmullen and Carradoan Woods, the former being a Nature Reserve. They are dominated by Sessile Oak (*Quercus petraea*) and Birch (*Betula pubescens*), but many other species are present including exotics such as Beech (*Fagus sylvatica*). Alder (*Alnus glutinosa*) and Willows (*Salix* spp.) occur in the wetter parts. An area of wet heath, dominated by Ling (*Calluna vulgaris*), occurs on the hill above Carradoran Wood. These woodlands display a generally intact structure and support a range of breeding birds, including Woodcock.

A further area of woodland, scrub and heath occurs above the north-east shore at Crockacashel and at Porthaw. Oak/Hazel (*Corylus avellana*) scrub is frequent, and there is a well developed ground flora with species such as Wood-sorrel (*Oxalis acetosella*), Herb Robert (*Geranium robertianum*), Lady's fern (*Athyrium filix-femina*) and Broad Buckler Fern (*Dryopteris dilatata*). The heath vegetation includes Ling (*Calluna vulgaris*), Common Gorse (*Ulex europaeus*), Wood Sage (*Teucrium scorodonia*) and Tormentil (*Potentilla erecta*). In the wetter areas, Purple Moor-grass (*Molinia caerulea*) and Cross-leaved Heath (*Erica tetralix*) occur.

The site supports a population of Otter, a species listed on Annex II of the EU Habitats Directive. Lough Swilly is an important site for waterfowl in autumn and winter. The shallow waters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe.

The adjacent pasture and arable polders at Inch, Big Isle and Blanket Nook support internationally important populations of Whooper Swans, Greenland White-fronted Geese and Greylag Geese. Inch Lough is an important roosting area for these birds and at times they utilise other parts of Lough Swilly for roosting.

This site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows, old oak woods) and supports a population of Otter. In addition, it is of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance plus 3 species occurring within the site and on adjacent polders in numbers of international importance.

Lough Swilly Special Protection Area (Site code 004075):

This site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly, a long inlet of the sea that cuts through a variety of metamorphic rocks on the west side of the Inishowen Peninsula. The Lough Swilly SPA extends from just below Letterkenny north to Rathmullan and, except in the area between Farsetmore and Blanket Nook on the southern side of Lough Swilly, the site is bounded by the High Water Mark; its seaward boundary is the Low Water Mark.

Between Farsetmore and Blanket Nook a series of improved pasture and arable fields of importance to geese and swans are included. The site includes sections of the estuaries of the River Swilly, the River Leannan and the Isle Burn and the predominant habitat is a series of extensive sand and mud flats which are exposed at low tide - both estuaries and sand/mud flats are listed on Annex I of the E.U. Habitats Directive. Other habitats represented on the site are salt marshes, lakes which are lagoonal in character (at Blanket Nook), rivers and streams, sand and shingle beaches, lowland wet, dry and improved grasslands, arable land, drainage ditches, reedbeds and scrub. The adjacent Inch Lough and Levels are included in a separate SPA.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallowwaters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup

(143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit (a species that is listed on Annex I of the E.U. Birds Directive) and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe, both Birds Directive Annex I species. Golden Plover, a species that is listed on Annex I of the E.U. Birds Directive, used the site regularly during winter (4 year mean of winter maximum 1994/95-1997/98 was 1,001 individuals).

Lough Swilly supports internationally important numbers of Greenland White-fronted Geese (5 year mean of winter maximum 1995/96-1999/00 for the Lough Swilly flock was 970 individuals), Whooper Swans (5 year mean of winter maximum 1995/96-1999/00 was 1,135 individuals, the largest population in the country) and Greylag Geese (5 year mean of winter maximum 1995/96-1999/00 was 2,020 individuals - this figure includes both migratory birds of the Icelandic population as well as an estimated 750-1,000 feral birds). The numbers of Greylag Geese using the site has continued to increase in recent years. The main areas of the site used by these species are at Big Isle, Farsetmore, Blanket Nook and Ballylawn. The Inch Levels are used by the same flocks of geese and swans - this area is included in a separate Special Protection Area. Both Greenland White-fronted Goose and Whooper Swan are listed on Annex I of the E.U. Birds Directive.

This site is of major ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance and 3 species occurring within the site in numbers of international importance. The site is regularly used by in excess of 20,000 waterfowl and thus qualifies as of international importance. The site is used by several species that are listed on Annex I of the E.U. Birds Directive.

(ix) Cumulative impacts with other projects or plans:

The Letterkenny & Environs Development Plan will operate alongside (a) the County Donegal Development Plan 2006- 2012 (as varied) (b) a number of existing local area plans the most relevant in this case being Newtowncunningham Local Area Plan 2007- 2013 & Amendment no 1 2008 and (c) a series of other local area plans that are being prepared for the surrounding towns and villages, particular in the border region. The boundaries for this assessment include Letterkenny extending to include Manorcunningham, Newtowncunningham, Bridgend and Burnfoot as well as the intervening rural environment.

Cumulatively, the strategic policy framework of these plans provides for the establishment of critical mass within Letterkenny together with limited nodal growth at other key towns in the gateway region. In parallel, the policy framework places greater restrictions on the development of single one- off houses in the rural area in the gateway region (Urban Generated Rural Development). The cumulative potential impacts relate to the spin off from concentration of population to defined locations and a reduction in the dispersed settlement pattern evidenced heretofore. This has the potential to lead to (a) changes in trip generations by means of private car from sporadic and frequent to less sporadic, less frequent and more coordinated and linked to key trips for key purposes that have the potential to be accommodated through public transport services. Thus the impact may be evidenced through a reduction in carbon monoxide emissions. (c) Increased connections to Wastewater Treatment Works in lieu of septic tanks/ individual treatment systems resulting in reduced risk of contamination of groundwater sources and reduced risk of contamination of natural habitats. (d) Reduced land take due to more efficient use of

land and higher densities resulting in reduction of threat of loss of natural habitat, important environmental, heritage and cultural features and landscapes of visual importance.

The potential cumulative impacts described above are likely to provide a more coordinated spatial planning framework for the growth of the region that will begin to redress the dispersed settlement pattern of the area and support the growth of Letterkenny in the context of the Linked Gateway and the surrounding support nodes with knock on benefits in the protection of the integrity of the Natura 2000 sites.

- **Target notes in respect of River Swilly located within the draft plan boundary (sourced from the 'Biodiversity Assessment Study of Letterkenny & Environs' May 2008, prepared by Catherine Storey, GlásEnviros Teoranta on behalf of Letterkenny Town Council and Donegal County Council).**

Survey title: Biodiversity assessment	Site name: Ballyraine/ port Bonagee Letterkenny	Weather conditions: Cold and bright sunshine J		
Grid ref. Elevation: 10m	Geology; Lough Foyle Succession Schist and grit with think marble units	OS map re: Discovery series		
Surveyor (s) C. Storey		Survey date(s): 6 th Oct 2007		
County: Donegal	LA District Buncrana	Townland		
JNNC Habitat code: B.6 poor semi- improved grassland.	Heritage council code: GS4 Wet grassland water logged	Bonagee		
Target note: B.6. Grassland, Hedgerow J.2.3. (GS4 wet grassland WL1 linear hedge, WL2 tree line, Gs2 Dry meadow) Survey: The site is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. The dyke systems were created and designed during the LondonDerry and Lough Swilly (LD & LS) railway construction period of mid 19th century. The engineering land management of the alluvial coastal plain has allowed the extensive use as prime arable lands for growing barley and oat crop. Observation: The site at present is used as cattle pasture. Plant species diversity was found to be generally low, increasing along the hedgerow ditches. Birds: Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Bird species noted during the field survey was a flock of 6 <i>Oenanthe</i> Wheatears within open hill area, a flock of 30 <i>Sturnus vulgaris</i> (Stralings) flying between the stands of hazel and hawthorn scrub. 10 of hooded crow <i>Corvus corone cornix</i> were sighted flying above the lowland pasture fields to the north of the site. Numerous woodland birds were observed within the stands of woodland scrub; <i>Fringilla coelebs</i> (Chaffinch), <i>Phylloscopus trochilus</i> (Willow Warbler), <i>Motacilla alba ssp. Yarelli</i> (Wagtail), <i>Erithacus rubecula</i> (Robin), <i>Prunella modularis</i> (Dunnock), <i>Turdus merula</i> (Black bird) <i>Certhia familiaris</i> Tree creeper, <i>Phyrrhula phyrrhula</i> (Bull Finch) and a small flock of 7 <i>Anthus prathensis</i> (meadow pipit). Mammals Likely habitat for badger, fox and rabbit. Otter was not observed during the site visits.				
A. Woodland	B. Grassland	C. Tall herb/ fern C.3.2 tall ruderal	D. Heathland	E. Mire
F. Swamp	G. Open water	H. Coastland	I. Rock etc < 2% rock exposures	J. Miscellaneous J.2.3. hedge mixed species. J.3.6 buildings

Dominant plant species recorded			
Abundance: DAFOR scale: D=Dominant, A+ Abundant, F+ Frequent, O=Occasional, R= Rare			
Plant species Latin	English	Species code	Abundance
Hedgerows			
Quercus robur	Oak		O
Alnus glutinosa	Alder		O
Crataegus monogyna	Hawthorn		D
Corylus avellana	Hazel		A
Sorbus aucuparia	Rowan		O
Prunus spinosa	Blackthorn		A
Illex aquifolium	Holly		R
Hedera helix	Ivy		F
Ulex europaeus	Whin		F
Betula pendula	Birch		O
Sambucus nigra	Elder		O
Salix caprea	Goat willow		F
Grasses			
Lolium perenne	Rye grass		O
Arrhenatherum elatius	False oat grass		O
Festuca rubra	Red Fescue		O
Festuca pratensis	Meadow fescue		F
F. ovina	Sheep fescue		O
Agrostis capillaries	Common bent		F
Agrostis Curtsi	Bristle bent		A
A. Stolonifera	Creeping bent		O
Anthoxanthum odoratum	Sweet vernal grass		D
Deschampsia cespitosa	Tufted hair grass		F
Holcus lanatus	Yorkshire fog		O
Rushes			
Juncus effusus			A
Juncus inflexus			O
Flora			
Cardamine pratensis	Cuckoo flower		O
Cirsium arvense	Thistle		F
Trifolium repens	Clover		F
Bellis perennis	Daisy		F
Taraxacum officinale	Dandelion		O
Succisa pratensis	Devils bit scabious		F
Senecio jacobaea	Ragwort		O
Prunella vulgaris	Self heal		O
Filipendula ulmaria	Meadow sweet		F
Angelica sylvestris	Angelica		O
Achillea millefolium	Yarrow		O
Oxalis acetosa	Wood Sorrel		O
Geranium robertianum	Herb Robert		O
Geranium pratense	Meadowcranes Bill		O
Rumex acetosa	Common sorrel		O
Lotus corniculatus	Birds foot trefoil		F
Vicia cracca	Tufted vetch		O
Vicia	Vetch		O

Scrub			
Crategus monogyna	Hawthorn		D
Prunus spinosa	Blackthorn		D
Corylus avellana	Hazel		F
Ilex aquifolium	Holly		F
Lonicera periclymenum	Honetsuckle		F
Rubus fructuosa	Blackberry		F
Salix sp(p)	Willow		F
Boundary edge trees			
Fraxinus excelsior	Ash		O
Crategus monogyna	Hawthorn		D
Acer pseudoplatanus	Sycamore		O
Sorbus aucuparia	Rowan		R
Prunus spinsosa	Blackthorn		F
Betula pendula	Birch		O
Quercus robur	Oak		R
Illex aquilifolium	Holly		R

11.2.4 Assessing the significance of any effects on the Natura 2000 site (step 4)

This section assesses the significance of the potential impacts identified within section 2.3. The significance of the impact is assessed in terms of the possibility of the impact affecting the integrity of the sites to the degree where they can no longer sustain and ensure the continued viability of the complex habitats and populations of species for which the sites were designated. In this context, the significance of the impacts identified at section 2.3 are now considered:

Impact	Significance
Physical changes that will flow from the plan.	Having regard to the location of significant areas of the Natura 2000 sites outside the plan area and in conjunction with the policy framework of the development plan in the areas of Natura 2000 sites located within the plan area, no significant physical changes are anticipated as a result of the plan and therefore there will be no significant impacts on the integrity of the sites.
Impacts flowing from the plan as a result of resource requirements.	There will be no land take from the sites as a result of the plan therefore there will be no significant impacts on the integrity of the sites. On completion of the Letterkenny/ Lough Mourne water supply scheme, there will be sufficient capacity in water supply to accommodate the future growth anticipated by the plan and therefore there will be no significant impacts on the integrity of the sites.
Impacts flowing from the plan as a result of emissions and waste.	The effects in relation to air quality are considered not to be significant but rather are considered to be neutral as a result of a balance between new development activities and the encouragement of sustainable transport modes particularly

	in the context of the neighbourhood strategies. The effects in relation to the existing position for WWTW's currently pose a threat to the water quality status of the Natura 2000 sites. However, the proposed scheme to upgrade the WWTW's that is being advanced by the Directorate of Water, Environment and Emergency Services and that is contained as a policy output in the plan, will assist in improving the WFD risk categories for the sites. Therefore, whilst it is recognised that there is an existing threat to the integrity of the sites as a result of waste water treatment arrangements, it is considered that significant measures are being put in place to actively reduce the existing threat. In addition, the plan emphasises requirements for appropriate connections to the WWTW's in lieu of septic tanks/ treatment systems. Therefore, on balance it is not considered that there will be significant impacts on the integrity of the sites so long as the upgrade of the WWTW's is advanced as anticipated.
Impacts flowing from the plan as a result of transport requirements.	Proposal in relation to new roads, construction of infrastructure to facilitate walking/ cycling/ public transport, are generally located in areas outside the Natura 2000 sites and therefore there will be no significant impact on the integrity of the sites.

11.2.5 Conclusions

This assessment has demonstrated that the plan may have indirect impacts on the Natura 2000 sites particularly in relation to treatment of wastewater and air quality. The outputs of the plan however, provide measures to redress any risk to the integrity of the sites and in relation to wastewater, will provide the environment for improvement of the conservation status of the sites.

It is therefore considered that there will be no significant adverse impacts on the identified Natura 2000 sites and therefore that an Appropriate Assessment is not required.

11.2.6 Consultations

The following appropriate authorities were consulted during the SEA scoping process i.e. pre- draft plan and pre- environmental report:

- Environmental Protection Agency, Regional Inspectorate.
- Department of the Environment, Heritage & Local Government, Development Applications Unit.
- Department of Communications, Energy and Natural Resources, Coordination Unit.

As a result of this consultation, the following responses (summaries of) were received:

- Department of the Environment, Heritage and Local Government: The plan should recognise the value of architectural heritage and conserve and enhance landscapes and landscape features. Architectural heritage should inform the content of the plan from the outset. Areas of special character should be identified and preserved by one or more ACA's and structures of special interest should be put forward for inclusion on the Record of Protected Structures. In respect of monitoring, qualitative indicators rather than quantitative indicators are more appropriate in adjudging subsequent environmental impacts on architectural heritage.
- Department of Communications, Energy and Natural resources: Indicated that the Department have no comments to make.

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