

Chief Executive's Report on submissions received in respect of the Draft Seven Strategic Towns Local Area Plan 2018-2024

**Directorate of Community, Enterprise and
Planning Services**

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**Comhairle Contae
Dhún na nGall**
Donegal County Council

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1 INTRODUCTION

1.1 Background

On 22nd November 2017, Donegal County Council gave notice of its intention to prepare a Local Area Plan (LAP) for the seven strategic towns of An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs. When adopted, the Seven Strategic Towns Local Area Plan 2018-2024 will set out an overall strategy, land use and zoning objectives for the proper planning and sustainable development of the seven towns. The Plan is being prepared so that it shall be consistent with the Core Strategy of the emerging County Development Plan, 2018-2024.

The process for the preparation of the Local Area Plan is prescribed under the Planning and Development Act 2000 (as amended) which provides, as an initial step, for a period of public consultation during which time submissions or observations in relation to the LAP are invited. The purpose of this report is to record the issues raised during the public consultation period that ran from November, 2017 until January, 2018 and to give the Chief Executive's opinions on these issues, together with his recommendations arising as a result of the consultation process.

1.2 Legislative Requirements

In accordance with Section 20(3)(c)(ii.) of the Planning and Development Act 2000 (as amended), the Chief Executive's report is required to:

- List the persons who made submissions or observations;
- Summarise the issues raised by the persons in the submissions or observations; and
- Contain the opinion of the Chief Executive in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

1.3 The Consultation Period

In accordance with Section 20(3) of the Planning and Development Act 2000 (as amended), the Planning Authority published notice of the proposal to make the LAP in 4 newspapers circulating in the area and advertised throughout the County via social media and the Council's website. Copies of the Draft LAP, inclusive of the associated Environmental Report, were made available from Friday 24th November, 2017 – Wednesday 24th January, 2018 (both dates inclusive) at the following Council offices:

- The Planning Office, Donegal County Council, County House, Lifford
- Letterkenny Public Services Centre, Neil T. Blaney Road, Letterkenny
- Milford Public Services Centre, Main St., Milford
- An Clochán Liath (Dungloe) Public Services Centre, Gweedore Road, An Clochán Liath
- Carndonagh Public Services Centre, Malin Road, Carndonagh
- Donegal Town Public Services Centre, Drumlonagher, Donegal Town
- Bunrana Council Offices, St. Orans Road, Bunrana

In addition, a public 'drop-in' event was organised for each town addressed in the LAP between 28th November 2017-14th December 2017 (Table 1.1 below refers), in order to allow interested parties to view and discuss the contents of the Draft LAP. These drop-in events were also advertised in the press, radio and on social media. Facilities were made available at the drop-in events for persons to make written submissions in relation to the LAP should they so wish.

Table 1.1: Details of Public Drop-In Events for LAP

Venue	Date and Time
Bayview Hotel, Main Street, Killybegs	Tuesday, 28th November 2017, 3pm-8pm
Former Chamber, Ballyshannon Branch Library, Abbey View Office Block, Main Street, Ballyshannon	Wednesday, 29th November 2017, 3pm-8pm
An Clochán Liath (Dungloe) Public Services Centre, Gweedore Road, Dungloe	Thursday, 30th November 2017, 4pm-8pm
Ballybofey/Stranorlar Library, The Base Enterprise Centre, Railway Road, Stranorlar	Tuesday, 5th December 2017, 3pm-8pm
Scoil Naomh Aonghus, Bunnamayne, Bridgend	Thursday, 7th December 2017, 4pm-8pm
Donegal Public Services Centre, Drumlonagher, Donegal Town	Wednesday, 13th December 2017, 3pm-8pm
Carndonagh Public Services Centre, Malin Road, Carndonagh	Thursday, 14th December 2017, 3pm-8pm

Submissions were received from 9 Prescribed Bodies and Environmental Authorities and a total of 1152 submissions were received from members of the public. The numbers of responses from members of the public per town are as follows: Bridgend – 84; Donegal Town: 31; Killybegs: 838; An Clochan Liath: 25; Ballyshannon: 35; Carndonagh: 22; Ballybofey: 33. It is considered that these numbers constitute a successful public consultation exercise, notwithstanding the weight of submissions received in respect of one town-Killybegs.

1.4 Strategic Environmental Assessment

The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by SI No. 201 of 2011) transpose the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law. A Strategic Environmental Assessment (SEA) of the Draft LAP is a mandatory requirement pursuant to Article 14B of the aforementioned SEA Regulations, as the total population of the Plan area is greater than 10,000 persons; and a SEA Environmental Report was thus prepared for, and accompanied publication of, the Draft LAP.

Only one Prescribed Body/Environmental Authority, the EPA, made a substantive submission on the SEA Environmental Report.

1.5 Appropriate Assessment

The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, as amended by Council Directive 97/62/EC), and both involve a number of steps and tests that need to be applied in sequential order. An AA Natura Impact Report was thus prepared for, and accompanied publication of, the Draft LAP.

No substantive submissions were received from any of the Prescribed Bodies/Environmental Authorities on the AA Natura Impact Report.

1.6 Stage 2 Strategic Flood Risk Assessment

Having regard to comments received from the Department of Housing, Planning and Local Government in response to the Draft County Development Plan, 2018-2024, a Stage 2 Strategic Flood Risk Assessment has been prepared to inform the preparation of the Draft LAP 2018-2024. The work has been undertaken by Tobin Consulting Engineers who were appointed following a public tendering competition. This work has had a significant influence on the finalisation of this report and has resulted in amendments to the text in Chapter 3 of the Draft LAP 2018-2024 (refer to Appendix B of this report, General Material Alteration Ref. GENMA2 for details) in addition to recommendations for rezoning where relevant. Rezoning details for each of the seven towns the subject of the Draft LAP can be found in their respective sections in Chapters 3-9 of this report.

1.7 Other Issues Arising

Finally, it should be noted also that a number of issues have been identified through consultations between different sections of the Council outside of being raised through any of the public submissions, or submissions received from the Prescribed Bodies/Environmental Authorities. These issues are also addressed in the relevant town sections of this report as and where necessary.

1.8 Next Steps

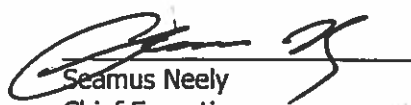
In accordance with the Sections 20(3)(d) of the Planning & Development Act 2000 (As Amended), the Members are now requested to consider the Draft Plan and the Chief Executive's Report. The Chief Executive's Report will be presented for formal consideration at the scheduled Plenary Council meeting of Monday 26th March, 2018 with a view to completing this stage of the Plan and seeking authorisation and a Resolution to proceed to issue Material Alterations as appropriate.

It is anticipated that Members shall require the opportunity to debate the contents of the report in workshop forum and, to that end, Municipal District level workshops have already been arranged as follows:

- **Stranorlar MD: Wednesday 28th February, 2018**
- **Donegal MD: Thursday 1st March, 2018 (all day)**
- **Inishowen MD: Tuesday 6th March, 2018**
- **Glenties MD: Wednesday 7th March, 2018**

1.9 Recommendation

Therefore and in accordance with Section 20(3)(d) of the Planning & Development Act, 2000 (As Amended), it is recommended that, the Members consider the Draft Seven Strategic Towns Local Area Plan 2018-2024 and Environmental Report together with the 'Chief Executive's Report', and thereafter decide that the Draft Plan should be amended in accordance with the list of proposed Material Alterations contained in Section 11 of the Chief Executive's Report subject to further steps as set out in Sections 20(3) of the Planning & Development Acts, 2000 (As Amended) including determinations as to whether a Strategic Environmental Assessment and/or Appropriate Assessment are required in respect of one or more of the proposed material alterations.


Seamus Neely
Chief Executive
Donegal County Council

2 PRESCRIBED BODIES SUBMISSIONS

2.1 Overview

A total of 9 submissions were received from Prescribed Bodies/Environmental Authorities. These include a number of positive and complimentary comments, including the following from the Department of Housing, Planning and Local Government: *'the draft Local Area Plan (LAP) provides a well-structured framework for planning of the seven strategic towns in physical, economic, social and environmental terms and in a way that broadly reflects national and regional policy objectives. Overall the draft LAP provides for a concise, comprehensive planning document for the seven towns.'*

The submissions include general observations including a comprehensive report from the EPA with a particular focus on the Environmental Report, as well as a number of town-specific comments from bodies including Transport Infrastructure Ireland, Irish Water and the Department of Culture, Heritage and the Gaeltacht.

General comments are addressed in this section of the report, while Town-specific comments are addressed in the relevant town sections.

Table 2.1: Prescribed Bodies Submissions

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
PB1		Department of Housing, Planning and Local Government, Forward Planning Section	<p>1. Provides a well-structured framework for planning of the seven strategic towns in physical, economic, social and environmental terms and in a way that broadly reflects national and regional policy objectives. Overall the draft LAP provides for a concise, comprehensive planning document for the seven towns. Welcomes the health check studies carried out to assess the vitality of the town centres and the evidence based, criteria driven, identification of lands for housing which is clearly laid out within each town chapter. However, there are some areas that could warrant further input in order to ensure the proper planning and sustainable development of the towns and the submission sets these out in further detail as below.</p> <p>2. Strategic Residential Reserve: The core strategy within the draft County Development Plan (CDP) is well laid out and indicates clear population targets and potential dwellings for the towns and villages throughout Donegal including headroom for market choice. The evidence based, criteria driven, identification of lands for housing within this draft LAP is clearly laid out within each town chapter and is broadly in compliance with the Draft CDP Core Strategy. However, some lands have been zoned as 'Strategic Residential Reserve'. While it is acknowledged that these lands will supply need over a longer term time frame, beyond the life of the current plan, the Department notes that all towns bar Ballybofey-Stranorlar (which has remained static and Donegal Town which has had a slight increase) (0.4%)) have declined in population between the 2011 and 2016 Census. Given that the proposed 'primarily residential' zoning provides</p>	<p>1. Comments noted.</p> <p>Recommendation: No change.</p> <p>2. The comments in relation to 'Strategic Residential reserve' are noted however it is considered that the provision through the Plan is appropriate and reasonable for the following reasons:</p> <p>(i) The Core Strategy of the Draft CDP 2018-2024 is to grow the County's Strategic Towns as the key drivers in the County and wider North west City region and as direct supporting urban centres to Letterkenny. Therefore, while the life of the plan is 6 years, the plan has been drafted having regard to a longer term 20 year horizon. The identification of 'Strategic Residential Reserve' provides clarity to all as to the Councils long term objectives for growth in each town.</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>the required level of potential development land for future housing provisions, requests that DCC re-examine the justification for any or a significant level of lands as 'strategic land reserve'.</p> <p>3. Water and Waste Water Service: Note that some of the towns, such as Ballybofey-Stranorlar and Bridgend, require upgrades to their existing waste water treatment systems in order to provide for any population expansion. Both upgrades are identified in the Irish Water Investment Plan 2017 – 2021. However, within the text, the plan is flexible on the potential of interim treatment plants. Recognising past and very serious difficulties with Developer Provided Infrastructure (DPI) for water services, which in Donegal's case are not fully resolved, the Department would be very strongly of the view that such solutions may only be considered in the context of the agreement of Irish Water and within the terms of its</p>	<p>(ii) The objectives and policies of the LAP ensure that SRR lands cannot be released in the absence of a review or amendment of the LAP. Any such review or amendment process will involve an evidenced based methodology to the need for release of SRR lands. This will provide for the proper planning and development of the towns.</p> <p>(iii) SRR lands have been identified in the context of and parallel to the identification of key infrastructure requirements. This long term approach attempts to coordinate investment in infrastructure with key future growth areas and this is considered to be an appropriate and sustainable approach.</p> <p>(iv) The amount of SRR lands identified is not considered excessive in the light of the foregoing justifications.</p> <p>Recommendation: No change.</p> <p>3. The comments in relation to wastewater treatment in Ballybofey-Stranorlar and Bridgend are noted and it is agreed that a collaborative approach between Donegal County Council and Irish Water is required to implement the policy in the Plan. Significant experience and practice has been built in relation to problematic cases of Development Provided Infrastructure in County Donegal and, in this context it is critical that wastewater arrangements are deemed secure, adequate and in compliance with relevant legislation. The collaborative approach to working with Irish Water will be continued, currently evidenced through a</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>connections policy and the fit of the given proposal with its strategic network investment approach. Requests that DCC engage with Irish Water on this point and to take any views on board in the finalisation of this plan.</p> <p>4. Flood Risk: Notes that flood risk assessment and management is contained within the SEA Environmental Report, Section 3.6 of the main text document and within each town section. Five towns within this LAP (An Clochan Liath (Dungloe), Ballybofey-Stranorlar, Carndonagh, Donegal Town and Killybegs are identified as Areas of Further Assessment (AFAs) within the CFRAM programme and the relevant mapping in relation to each is contained in the relevant town chapter. This is welcomed however, in order to further improve transparency and understanding the Department requests the incorporation of flood extent data on the land use zoning maps.</p>	<p>scheduled meeting of Irish Water and Donegal County Council Officials in relation to strategic planning issues and development management referral issues.</p> <p>Recommendation: No change.</p> <p>4. Comments noted. A stage 2 Strategic Flood Risk Assessment has been prepared in relation to the Draft LAP including the identification of flood zoning mapping in respect of all seven town which is to replace Draft CRAM mapping that is inserted in each towns section of the plan. In addition, this report also provides for town specific recommendations to necessary rezonings as a result of the outputs of the SFRA and its evidential basis. The recommendation below provides for an update of the draft Plan text to reflect the Stage 2 SFRA and to insert flood zone mapping to replace Draft CFRAM mapping.</p> <p>Recommendation: Amend the LAP so as to incorporate the outputs of the Stage 2 Strategic Flood Risk Assessment as set out in Appendix B to this report.</p> <p>This is a Material Alteration - Ref. GENMA2.</p>
PB2		Environmental Protection Agency	<p>1. Refer to their submission on the Draft CDP, 2018-2024 and state that the relevant recommendations should be taken into account in the Draft Seven Strategic Towns LAP, as relevant and appropriate.</p>	<p>1. Noted. All relevant recommendations made by the EPA in relation to the Draft CDP 2018-2024 will be taken into account in the Draft LAP as appropriate.</p> <p>Recommendation: Amend the Environmental Report as appropriate, having regard to the</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>2. Infrastructure: Note the wide range of proposed infrastructural projects in areas such as new roads, road upgrades, marina development, river crossings, bridges, pedestrian and cycle routes etc. All proposed development should be planned and implemented in accordance with the requirements of the EIA, Habitats, Floods and Water Framework Directives. This should ensure that environmentally sensitive areas which may be impacted are assessed and appropriate environmental protection and mitigation measures are put in place. The implications of climate change should also be considered particularly in areas such as critical infrastructure provision.</p>	<p>recommendations made by the EPA in relation to the Draft CDP 2018-2024.</p> <p>This is a Non-Material Alteration – Ref. GENNMA1.</p> <p>2. The Draft CDP and the Draft LAP should be read in tandem when interpreting the specific policies and objectives for the seven strategic towns. The general development management policies and standards of the Draft CDP are applicable to the Draft LAP. The Draft CDP has incorporated significant environmental mitigation measures in the form of proactive objectives and policies in accordance with the requirements of the EIA, Habitats, Floods and Water Framework Directives. These reflect the consideration given to potential environmental impacts throughout the iterative process of plan development which has guided the formulation and environmental assessment of all policies and objectives.</p> <p>The Draft CDP and the Draft LAP include policies to ensure that an ecological assessment, including where necessary an EIA, is carried out as part of the assessment of development proposals.</p> <p>The Draft CDP and the Draft LAP include policies to protect the Natura 2000 network through compliance with Article 6 of the Habitats Directive as part of the assessment of development proposals.</p> <p>All development proposals will be assessed in</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
				<p>accordance with 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities', (DoEHLG, 2009), and a sequential approach to flood risk mitigation will be adopted. All stages of flood risk management are required to comply with Articles 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interest and threats to the integrity of Natura 2000 site. In addition, the Council has engaged Consultants to carry out a Stage 2 Strategic Flood Risk Assessment (SFRA) for the seven towns subject to the Draft LAP which has informed the policies and objectives of the Draft LAP and in some instances has resulted in lands being rezoned to accommodate less vulnerable uses.</p> <p>The Draft CDP and the Draft LAP include many objectives and policy commitments to maintaining and restoring water quality in line with implementation of the Water Framework Directive through the relevant River Basin Management Plan and Programme of Measures.</p> <p>The implication of climate change will be considered particularly in areas such as critical infrastructure provision.</p> <p>Recommendation: In the interest of consistency with amendments made to the Draft CDP amend Section 1.6 Appropriate Assessment of the Draft LAP as follows:</p> <p>The Plan shall not have (or perpetuate) adverse effects on the integrity of the Natura 2000 Network</p>

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			<p>3. Policies and Objectives of the Draft CDP: Appendix A- Policies and Objectives of the Draft CDP, is noted. In the interests of clarity, it would be helpful to highlight in the relevant sections where specific key policies and objectives of the Draft CDP are responsible for mitigating/managing</p>	<p>or any European site (unless in exceptional circumstances where the provisions of Article 6(4) of the Habitats Directive may be invoked). Furthermore all policies and objectives of the Plan and their implementation are subject to compliance with Article 6 of the Habitats Directive and to the full range of considerations that may apply for compliance with the Birds Directive, the EIA Directive, the SEA directive and relevant national legislation. The Council in its duties as a public authority, under Regulation 27 of the European Communities (Birds and Natural Habitats) Regulations, 2011, shall exercise its functions, including consent functions, in compliance with or so as to secure compliance with the requirements of the Habitats Directive and the Birds Directive, and the above mentioned European Communities (Birds and Natural Habitats) Regulations 2011, and shall take appropriate steps to avoid in a European site the deterioration of natural habitats and the habitats of species as well as the disturbance of the species for which the site has been designated, insofar as such disturbance could be significant in relation to the objectives of the Habitats Directive.</p> <p>This is a Non-Material Alteration – Ref. GENNMA2.</p> <p>3. Noted. In the interests of clarity a new Section 1.7 Environmental Mitigation and Management will be added to the Draft LAP.</p> <p>Recommendation:</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>environmental issues that have been identified.</p>	<p>A. Add a new Section 1.7 Environmental Mitigation and Management as follows: [Consequently, the existing Section 1.7 Relationship with other Plans and Guidelines will be renumbered as Section 1.8]</p> <p>The Draft LAP has incorporated significant environmental mitigation measures in the form of proactive objectives and policies. These reflect the consideration given to potential environmental impacts throughout the iterative process of plan development which has guided the formulation and environmental assessment of all policies and objectives. It should also be noted that objectives and policies set out in the Draft CDP, and highlighted in the Natura Impact Report of Draft County Donegal Development Plan 2018 - 2024 also apply to the Draft LAP.</p> <p>Specific objectives and policies with positive environmental affects in the Draft LAP 2018-2024 are listed in Appendix A, Section 16:0. Some 63 of the objectives and policies set out in the Draft LAP specifically reference compliance with the Habitats Directive as a condition of implementation. A further 8 objectives or policies impose a constraint of no impact on Natura 2000 sites.</p> <p>Specific objectives and policies with positive environmental affects in the Draft CDP 2018-2024 are listed in Appendix A, Section 17:0. Some 27 of the objectives and policies set out in the Draft CDP specifically include compliance with Article 6 of the Habitats Directive as a condition of implementation. A further 10 objectives or policies impose a constraint of no impact on Natura 2000 sites. In</p>

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				<p>addition to this, wider environmental constraints are referenced throughout many of the objectives and policies of the Draft CDP, including compliance with RBMPs and Programmes of Measures, Freshwater Pearl Mussel Sub-Basin Plans, Shellfish Pollution Reduction Programmes, and EU Biodiversity Strategy.</p> <p>In addition to the specific objectives and policies listed in the Draft LAP and Draft CDP, many others promote environmentally beneficial measures such as retention of natural vegetation, hedgerows and woodland and best practice in flood risk abatement, or consideration of statutory environmental management plans (e.g. RBMPs and Programmes of Measures, Freshwater Pearl Mussel Sub-Basin Plans, Shellfish Pollution Reduction Programmes, and EU Biodiversity Strategy). Together they create an ethos of environmental awareness and appreciation that pervades the Draft CDP and Draft LAP and will contribute significantly to maintaining the conservation status and integrity of the Natura network.</p> <p>B. Include a new Section 16.0 Specific Objectives and Policies with Positive Environmental Affects in Appendix A of the Draft LAP 2018-2024 and a new Section 17.0. Specific Objectives and Policies with Positive Environmental Affects in the Draft CDP 2018-2024 in Appendix A of the Draft LAP 2018-2024 as follows: [Consequently, the existing Section 16.0 Development Guidelines and Technical Standards will be renumbered as Section 18.0]</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
				<p>Section 16.0 Specific Objectives and Policies with Positive Environmental Affects in the Draft LAP 2018-2024</p> <p>General objectives and policies presented in the Draft LAP apply in the case of each town covered by the Plan. General objectives and policies with positive affects for natural heritage and development (Objectives GEN-TC-2 GEN-EH-2, GEN-EH-3, GEN-EH-4, and Policies GEN-ED-5, GEN-EH-2 and GEN-EH-3) provide explicit and strong protection for the environment in general and for the Natura network of sites in particular through compliance with Article 6 of the Habitats Directive. Implementation of these objectives and policies will be critical for protection of SACs, and SPAs, and sites with other environmental designations or protected status, and for protection of species identified in the Wildlife Acts and Flora Protection Order.</p> <p>Other environmentally positive objectives and policies are listed specifically in relation to particular towns in the Draft LAP (Objectives BS-IS-2, BY-EH-1, BE-IS-1, CN-EH-1, CN-EH-2, DT-EH-1, and KB-EH-1, and Policies BY-EH-1, CN-MP-5, CN-IS-5, CN-EH-1, CN-EH-2, CN-EH-3 and DT-EH-1) and also provide for protection of the wider environment and prevention of impact on Natura sites. In particular they provide mitigation measures for surface and groundwater protection, upgrades to critical infrastructure, constraints on development in vulnerable areas, and implementation of environmentally favourable management practices</p>

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				<p>such as SuDs.</p> <p>17.0 Specific Objectives and Policies with Positive Environmental Affects in the Draft CDP 2018-2024</p> <p>A suite of objectives and policies dealing with natural heritage (NH-O-1 to NH-O-11 and NH-P-1 to NH-P-5, NH-P-10 and NH-P-18) provide explicit and strong protection for terrestrial, aquatic, water-dependent, and marine habitats and ecosystems. In particular they provide for protection of the Natura network of sites through compliance with Article 6 of the Habitats Directive, but also for conservation of a wider spectrum of habitats and species of significance in order to maintain biodiversity in general. Implementation of these objectives and policies will be critical for protection of SACs, SPAs, NHAs, pNHAs and RAMSAR sites, WFD Protected Areas, sites of high environmental status and for protection of species identified in the Wildlife Acts and Flora Protection Order.</p> <p>Objectives WES-O-4, WES-O-5, WES-O-6, and WES-O-7, and policies WES-P-4, WES-P-5, and WES-P-8 also provide for environmental protection. In particular they ensure that surface and groundwaters will be protected through implementation of the relevant River Basin Management Plan (RBMP) and Programme of Measures, and that water quality will be maintained, protected and enhanced.</p> <p>Objectives WES-O-7 and WES-O-8, and policies WES-P-5, WES-P-6 and WES-P-7 have been</p>

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			<p>4. Climate Change Mitigation and Adaptation: Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. The effects of climate change are already discernible in Ireland and projected impacts include higher intensity rainfall events, more intense storms and storm surge, sea level rise, warmer temperatures and longer periods of low rainfall. While the environmental objectives on climate change included in the SEA/ER are noted, recommend that the Plan includes a section detailing how climate change mitigation and adaptation measures will be considered in implementing the Plan. A commitment should be given to integrating the climate change recommendations of the Draft Donegal CDP 2018-2024, upon adoption, into the Plan.</p> <p>The EPA has published guidelines to support local authorities</p>	<p>included in the Draft CDP to ensure that waste is prevented and minimised in line with targets and objectives of the Regional Waste Management Plan, and that waste generated is managed and treated without causing environmental pollution.</p> <p>Other objectives and policies (WES-O-1 to WES-O-3, WES-O-9, WES-P-1 to WES-P-3, WES-P-9, and WES-P-11) provide for the timely and coordinated delivery of infrastructure in tandem with proposed development so that potential environmental impacts are mitigated appropriately in line with prioritized programmes.</p> <p>This is a Non-Material Alteration – Ref. GENNMA3.</p> <p>4. Noted. In the interests of clarity a new Section 1.8 Climate Change Mitigation and Adaptation will be added to the Draft LAP 2018-2024.</p> <p>Recommendation: Add a new Section 1.8 Climate Change Mitigation and Adaptation as follows: [Consequently, the existing Section 1.7 Relationship with other Plans and Guidelines will be renumbered as Section 1.9]</p> <p>The Government's National Renewable Energy Action Plan, 2010 (Irish Government submission to the European Commission) that sets out Ireland's National targets for generation of energy consumption from renewable energy sources by 2020 (as derived from EC Directive 2009/28). Within this context, Ireland is legally obliged to ensure that by 2020 at least 16% of all energy</p>

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			<p>in developing local climate adaptation strategies (EPA, 2016). The 'Climate Ireland' website provides information, support and advice to help local authorities, sectors and government departments to adapt to climate change and includes a Local Authority Adaptation Support Wizard. It can be consulted at www.climateireland.ie.</p>	<p>consumed in the state is from renewable resources. In Ireland, the Government has set an electricity target of 40% electricity consumption from renewable sources by 2020, together with a target of 10% in the transport sector and 12% renewable heat by 2020.</p> <p>The Government's 'Strategy for Renewable Energy 2012- 2020' which recognises that the development of renewable energy is central to overall energy policy in Ireland, as it has the potential to reduce dependence on fossil fuels; to improve security of supply; and to reduce greenhouse gas emissions creating environmental benefits while delivering green jobs to the economy, thus contributing to national competitiveness.</p> <p>The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR) which sets out a framework to guide policy and the actions that it intends to take in the energy sector up to 2030 taking into account European and International climate change objectives and agreements, as well as Irish social, economic and employment priorities.</p> <p>The National Mitigation Plan contains a series of mitigation measures and actions to address the immediate challenge to 2020 and to prepare for the EU targets that Ireland will take on for 2030. The National Mitigation Plan covers greenhouse gas emissions in the Electricity Generation, Built Environment, Transport, and Agriculture, Forest and Land Use sectors. For each sector, the Plan sets out the sectoral policy context, the greenhouse gas emissions trends for each sector, the</p>

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			<p>Specific Comments on the Environmental Report</p> <p>5. Non-Technical Summary (NTS): There is merit in including Figure 1.2 Vulnerability Mapping in County Donegal and Figure 5.23 Scenic Amenity Map, in the NTS. The NTS should also include specific information on the proposed monitoring programme, for example a table summarising the selected indicators, targets, monitoring sources, monitoring frequency, responsibilities and reviews etc.</p>	<p>opportunities and challenges, mitigation measures currently in place and under development, and specific actions to take forward work within each sector.</p> <p>Donegal County Council prepared an adaptation paper as part of Irelands first statutory National Adaptation Framework (NAF) which was published on 19th January 2018. The NAF sets out the national strategy to reduce the vulnerability of the Country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015.</p> <p>This is a Non-Material Alteration – Ref. GENNMA4.</p> <p>5. In the interests of clarity Figure 1.2 Vulnerability Mapping in County Donegal and Figure 5.23 Scenic Amenity Map will be included in the NTS. In addition, the NTS will include specific information on the proposed monitoring programme.</p> <p>Recommendation: Include Figure 1.2 Vulnerability Mapping in County Donegal and Figure 5.23 Scenic Amenity Map in Section 1.1 Non-Technical Summary of the Environmental Report for the Draft LAP 2018-2024. In addition, include a summary of the proposed monitoring programme for the Draft LAP in Section 1.1 Non-Technical Summary of the Environmental Report.</p> <p>This is a Non-Material Alteration– Ref.</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>6. Planning Context: Note the reference in Section 1.5 Planning Context to the National Planning Framework (NPF) and the Northern & Western Regional, Spatial and Economic Strategy (RSES) superseding the National Spatial Strategy 2002-2020 and the Border Regional Planning Guidelines 2010-2022 (RPGs) respectively during the lifetime of the Plan. There is merit in including in the Plan a commitment to integrating the recommendations of both the NPF and Northern & Western RSES, upon adoption.</p> <p>7. Critical Infrastructure Provision: Acknowledge the review of the wastewater capacity of the seven strategic towns undertaken in 5.14 Wastewater Treatment and note that Ballybofey-Stranorlar, Bridgend and Killybegs currently require a significant upgrade to wastewater provision. We also note that these upgrades are reflected in Table 5.8 Irish Water Investment Plan 2017-2021 (IP2) Wastewater Projects in the Plan Area.</p> <p>Table 5.2.1 Requirements for waste water treatment for multiple developments included in Appendix A-Policies of the Draft CDP, is also noted. Where relevant and appropriate, the commitment included in Table 5.2.1 of the Draft CDP that 'waste water treatment infrastructure shall be in place, operational and with adequate capacity, prior to any part of the development being occupied', should also be reflected in</p>	<p>GENNMA5.</p> <p>6. In the interest of clarity a commitment to integrate the recommendations of both the NPF and Northern & Western RSES, upon adoption will be included in Section 1.5 Planning Context of the Environmental Report for the Draft LAP.</p> <p>Recommendation: Amend Section 1.5 Planning Context of the Environmental Report for the Draft LAP 2018-2024 to include commitment to integrate the recommendations of both the NPF and Northern & Western RSES, upon adoption.</p> <p>This is a Non-Material Alteration – Ref. GENNMA6.</p> <p>7. The commitment included in Table 5.2.1 of the Draft CDP 2018-2024 that 'waste water treatment infrastructure shall be in place, operational and with adequate capacity, prior to any part of the development being occupied', will be included in Section 2.1.2 Infrastructure of the Draft LAP.</p> <p>Recommendation: Amend Section 2.1.2 Infrastructure of the Draft LAP to read as follows:</p> <p>The realisation of the objectives and policies in this Draft LAP are dependent on the completion of key infrastructure. The upgrade of the wastewater network is a critical determinant for significant new development in the seven towns. Waste water treatment infrastructure shall be in place, operational and with adequate capacity, prior to any part of the development being occupied. An</p>

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			<p>the Plan.</p> <p>8. Environmental Pressures: Note the environmental pressures in the Plan areas as described in the 'Summary of Environmental Pressures within the Plan Area (Environmental Report Table 6.2, p. 165). This should include the need for both improved waste water treatment provision and the need to protect key landscape character areas.</p> <p>9. Assessment of Strategic Policy Objectives: Acknowledge the inclusion of Table 8.4 'Assessment of Strategic Policy Objectives' (SPO's). Where the assessment has identified</p>	<p>upgraded transport network is also required to support development and in particular new residential development within the LAP lands.</p> <p>This is a Non-Material Alteration – Ref. GENNMA7.</p> <p>8. The need for both improved waste water treatment provision and the need to protect key landscape character areas will be included in Table 6.2, p. 165 of the Environmental Report for the Draft LAP and in the NTS, Table 1.2, pg. 5 of the Environmental Report.</p> <p>Recommendation: Amend Table 1.2 Summary of Main Environmental Pressures within the Plan Area in Section 1.1 Non Technical Summary, pg. 5 of the Environmental Report and Table 6.2 Summary of Main Environmental Pressures within the Plan Area in Section 6.11 Summary of Main Environmental Pressures in the Plan Area,, pg. 165 of the Environmental Report to include the need for both improved waste water treatment provision and the need to protect key landscape character areas under Environmental Issue/Pressures.</p> <p>This is a Non-Material Alteration – Ref. GENNMA8.</p> <p>9. Noted. The Draft LAP contains substantial environmental mitigation measures in proactive objectives and policies. Account has been taken of the potential for environmental impact throughout</p>

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			<p>that a number of the SPOs have the 'potential for conflict' with the status of specific Strategic Environmental Objectives, appropriate mitigation measures should be provided to minimise/mitigate the potential for significant environmental effects. Monitoring of the significance or otherwise of 'uncertain effects' identified in Table 8.4 should also be addressed as part of the on-going monitoring programme.</p> <p>10. Secondary, Cumulative (including Transboundary) Effects: The SEA should include information on how the full range of environmental effects of implementation of the Plan, have been assessed and documented. In particular, the Environmental Report should describe whether transboundary or cumulative effects/in-combination effects with other plans/programmes have been identified. How the full range of potential effects will be monitored and mitigated for over</p>	<p>the iterative process of plan development and this has guided the drafting of policies and objectives.</p> <p>Constraints to prevent environmental impact are referenced throughout many of the objectives and policies of the Draft LAP. They include requirements to comply with relevant national and European environmental legislation, strategies and plans including River Basin Management Plans, Freshwater Pearl Mussel Sub-Basin Plans, Shellfish Pollution Reduction Programmes, and EU Biodiversity Strategy.</p> <p>The monitoring programme is based on the environmental objectives, indicators and targets as set out in Table 8.1 of the Environmental Report for the Draft LAP. The measures outlined in Table 8.1 have been set out as part of the SEA to monitor the significant environmental effects of the implementation of the LAP and any gaps identified in the Environmental Report to help identify issues that need addressing during the lifetime of the LAP.</p> <p>Recommendation: No change.</p> <p>10. Cumulative and in-combination effects were considered in relation to other plans and programmes of relevance. Many of these were used to guide the formulation of objectives and policies in the Draft LAP. Many are themselves mutually complementary and supportive having been prepared as part of coordinated and structured planning systems and individually assessed in respect of Habitats Directive</p>

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			<p>the lifetime of the Plan should also be clarified.</p>	<p>Appropriate Assessment.</p> <p>County Donegal has an extensive border with Northern Ireland (c. 140km) and as such there is potential for cross border (transboundary) environmental issues particularly in relation to shared Natura 2000 sites. These potential transboundary impacts are considered within the Environmental Report for the Draft LAP.</p> <p>In the interest of consistency with amendments made to the Draft CDP suggested changes to the Strategic Environmental Objectives, in Chapter 8 of the Environmental Report will be made to clarify the transboundary obligations in relation to the protection of the Natura 2000 network of European sites.</p> <p>As noted above, the monitoring programme is based on the environmental objectives, indicators and targets as set out in Table 8.1 of the Environmental Report to monitor the significant environmental effects of the implementation of the LAP both within the County and within a surrounding 15km buffer including cross border linkages, or a wider zone of influence where potential impact is considered possible.</p> <p>Recommendation: In the interest of consistency with amendments made to the Draft CDP 2018-2024 amend the Strategic Environmental Objectives, in Chapter 8 of the Environmental Report and amend all relevant tables to clarify the transboundary obligations in relation to the protection of the Natura 2000 network of European</p>

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			<p>11. Biodiversity: The Plan should include a commitment to protect existing ecological corridors and habitats and protected species, undesignated sites / areas of local biodiversity interest and to improve green infrastructure where possible.</p>	<p>sites.</p> <p>This is a Non-Material Alteration – Ref. GENNMA9.</p> <p>11. Noted. The Environmental Report recognises the importance of ecological corridors. In this regard Section 5.5 of the Environmental report states 'Article 10 of the Habitats Directive recognises the importance of ecological networks as corridors and stepping stones for wildlife, including for migration, dispersal and genetic exchange of species of flora and fauna. The Directive requires that ecological connectivity and areas of ecological value outside the Natura 2000 network of designated ecological sites are maintained and it recognises the need for the management of these areas through land use planning and development policies. Ecological networks are important in connecting areas of local biodiversity with each other and with nearby designated sites so as to prevent islands of habitat from being isolated entities. Ecological networks are composed of linear features, such as treelines, hedgerows, rivers and streams, which provide corridors or stepping stones for wildlife species moving within their normal range. They are particularly important for mammals, especially for bats and small birds.' Section 5.5 also includes a list of water bodies (including their tributaries and lakes where relevant) in the Plan area. In recognition of the importance of protecting ecological corridors and habitats it is recommended to include a commitment for their protection as a target for the</p>

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			<p>12. Habitat Mapping: In implementing the Plan, development of the area should be informed by any available habitat mapping and the relevant aspects of the Draft County Donegal Heritage Plan 2014-2019.</p> <p>13. Monitoring: While noting that monitoring of the Plan is referenced in the Plan itself, note that there is limited</p>	<p>Strategic Environmental Objective BIO2 in Chapter 8 of the Environmental Report.</p> <p>Recommendation: Amend the target for Strategic Environmental Objective BIO1 in Table 8.1 of the Environmental Report to include the following text:</p> <p>'Protect existing ecological corridors and habitats and protected species, undesignated sites/areas of local biodiversity interest and improve green infrastructure where possible'.</p> <p>This is a Non-Material Alteration – Ref. GENNMA10.</p> <p>12. Noted. The Environmental Report details the 'Current State of the Environment' or 'Baseline' of the seven towns using known available data sources including habitat mapping. Geographical Information Systems (GIS) were used heavily in both the identification and mapping of the various layers of environmental vulnerabilities and also as a tool in assessing the cumulative effect of potential developments. The 'vulnerability' mapping system developed has been constantly updated with new data sets, including habitats, and shows an up to date picture of the environmental vulnerabilities that exist in the Plan area at present.</p> <p>Recommendation: No change.</p> <p>13. Noted. In the interests of clarity Section 8.1 Monitoring, Environmental Objectives, Indicators and Targets, Section 8.2 Assessment of Objectives,</p>

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			<p>reference to monitoring in the Environmental Report. In the interests of clarity, recommend that the ER include a separate distinct section on monitoring, rather than including this under 'The Likely Evolution of the Environment in the Absence of the Implementation of the Local Area Plan'. Recommend that full detail be provided on the monitoring proposed including:</p> <ul style="list-style-type: none"> • Environmental Objectives • Indicators • Targets • Monitoring frequencies • Data sources • Monitoring of both positive and negative effects, including unforeseen adverse effects • Monitoring the potential for secondary and cumulative effects • On-going review of environmental targets and indicators. Responsibility for this role should be clearly defined • Appropriate interim review(s) to assess the on-going effectiveness of the monitoring programme. <p>The Monitoring Programme should be flexible enough to take account of specific environmental issues as they arise. The programme should be designed to allow possible cumulative effects and unforeseen adverse effects to be identified and responded to as appropriate. As previously referenced, monitoring of the uncertain interactions with the status of SEOs identified in Table 8.4, should also be addressed. Details of the SEA-related monitoring programme should also be included in the Plan and associated Implementation and Monitoring Programme.</p>	<p>Policies and Settlement Frameworks and Section 8.3 Conclusion will be moved into a new Chapter 9 Monitoring of the Draft Local Area Plan 2018-2024. In addition the new Chapter 9 will include additional text re: monitoring of the Plan as suggested in the EPA submission.</p> <p>Recommendation: Include a new in the Environmental Report entitled Chapter 9 Monitoring of the Draft Local Area Plan 2018-2024 to incorporate the existing Section 8.1 Monitoring, Environmental Objectives, Indicators and Targets, Section 8.2 Assessment of Objectives, Policies and Settlement Frameworks and Section 8.3 Conclusion. In addition the new Chapter 9 will include additional text re: monitoring of the Plan as suggested in the EPA submission.</p> <p>This is a Non-Material Alteration – Ref. GENNMA11.</p> <p>14. Noted. It is a requirement of the Planning and</p>

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			<p>14. Future Amendments to the Draft Plan: Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.</p> <p>15. SEA Statement – “Information on the Decision”: Following adoption of the Plan, an SEA Statement, should summarise</p>	<p>Development Act 2000 (as amended), [Section 12(7)(aa)] to determine if a Strategic Environmental Assessment (and Appropriate Assessment) is/are required to be carried out in respect of the proposed Material Alterations of a Draft Development Plan. As such, once the Chief Executives Report, including the Proposed Material Alterations have been considered by the Members a SEA Screening Report will be prepared to evaluate the requirement to carry out an SEA for the proposed Material Alterations, as set out in the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended). The Screening Report will take account of the relevant criteria set out in Schedule 2A ‘Criteria for determining whether a plan or programme is likely to have significant effects on the environment’ of the Planning and Development (Strategic Environmental Assessment) Regulations (as amended), and Appendix 1 of the EU (SEA) Directive 2001/42/EC on the Assessment of Certain Plans and Programmes on the Environment.</p> <p>Similarly an AA Screening Report will be undertaken in tandem to assess the impact of the proposed Material Alterations on Natura 2000 sites (SACs and SPAs) in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/443/EEC).</p> <p>Recommendation: No change.</p> <p>15. Noted. Once the Plan has been adopted an SEA Statement will be prepared in respect of the Adopted Local Area Plan 2018-2024 will be</p>

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			<p>the following:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.</p>	<p>prepared in accordance with Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended) and including a summary of the information outlined in the EPA submission.</p> <p>Recommendation: No change.</p>
PB3	Killybegs	Department of Agriculture, Food and the Marine	Note: Submission refers exclusively to a Killybegs Harbour issue and the submission is therefore addressed in the Killybegs section of this report.	Refer to Section 9 of this report which relates exclusively to Killybegs.
PB4		Transport Infrastructure Ireland	<p>1. The TII submission contains both general comments and also specific comments in relation to five of the seven towns (An Clochán Liath; Ballybofey/Stranorlar; Ballyshannon; Bridgend; and Donegal Town).</p> <p>2. Request that the Draft Plan should reference the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities in Section 3; General Objectives and Policies of the Plan. and to reflect the provisions of 4.1.3 Transportation Policies of the CDP, 2012-2018 (As varied).</p>	<p>1. Noted. The general comments are addressed in this section of the report, and the town-specific issues raised are both summarised and responded to in the relevant town sections of this report.</p> <p>Recommendation: No change.</p> <p>2. The comments made are noted however, the LAP is structured so as not to duplicate the overriding objectives and policies of the relevant County Donegal Development Plan with particular reference to ensuring compliance with the most up-to-date iteration in the form of the Draft CDP 2018-</p>

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			<p>3. Welcomes reference to the EU TEN-T network in the Draft Plan and outlines ongoing work in conjunction with Donegal County Council to prepare a Corridor Needs Study on the TEN-T comprehensive network within Donegal. Advises that the outcome of the study prioritises schemes necessary to improve the route to TEN-T requirements. TII recommends consultation with Donegal County Council National Road Design Office to ensure the most up to date position in relation to the TEN-T Comprehensive Network and proposed improvements is included in the Draft Plan prior to adoption.</p> <p>4. The submission makes general comments in relation to masterplans stating:</p> <ul style="list-style-type: none"> • A number of specific objectives included in the Draft Plan require Opportunity Sites and Strategic Economic Development Opportunity Sites to prepare future agreed master planning exercises, TII would draw the Council's attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans. • Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them 	<p>2024. This approach is outlined in section 1.3 of the Draft LAP. It is noted that the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities are appropriately referenced in the Draft CDP 2028-2024.</p> <p>Recommendation: No change.</p> <p>3. Comments noted.</p> <p>Recommendation: No change.</p> <p>4. Comments are noted and agreed and it is acknowledged that positive collaboration is taking place with TII in this regard. Donegal County Council are committed to this collaborative approach and working with the parameters of the range of Guidelines in so far as practicable whilst at the same time being robust to respond to potential opportunities on an ongoing basis.</p> <p>Recommendation: No change.</p>

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			<p>in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. This is not evident in the text associated with Masterplans proposed in the Draft Local Area Plan with the potential to impact on the adjoining strategic national road network.</p> <ul style="list-style-type: none"> • A primary issue, in this regard, relates to the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for the strategic national road network in the area concerned, particularly those Masterplans proposed in Dungloe, Ballybofey-Stranorlar, Bridgend and Donegal Town. The Authority considers that such issues can be addressed with collaboration and should be addressed in advance of adoption of the Draft Local Area Plan. • The Council will be aware that the DoECLG Spatial Planning and National Roads Guidelines require that development should be Plan-led, as outlined above. The promotion of masterplan exercises without consultation and liaison by the local authority with TII (and other stakeholders) and in the absence of strategic transport and/or access evidence base requirements, where relevant, is inappropriate and leads to risks for future development. The absence of any mechanism/ framework for agreeing Masterplans and incorporating the agreed masterplans into a statutory framework is also a concern. • The DoECLG Guidelines require that planning authorities ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads. The Authority requests that this issue is addressed in the Draft Local Area Plan concerning Masterplan 	

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			<p>exercises that have the potential to impact the strategic national road network.</p> <ul style="list-style-type: none"> • Acknowledges the effective collaboration that has previously been undertaken with Donegal County Council on some of the sites/locations identified above and welcomes continued engagement with the Council to address any issues arising in a manner that ensures development proposals can be progressed complementary to safeguarding the strategic function of the national road network in the area. <p>5. In relation to Traffic and Transport Assessment, the following comments are made:</p> <ul style="list-style-type: none"> • Recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the local area plan concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Noise requirements and Signage, etc. • Requests reference is made to the TII Traffic & Transport Assessment Guidelines (2014) in the Draft Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads. <p>6. TII welcomes the referral, acknowledges consultation to-date on specific sites included in the Strategic Towns, and confirms availability to continue this collaboration with the Council.</p>	<p>5. As outlined in response to point 2 above the LAP is structured so as not to duplicate the overriding objectives and policies of the relevant County Donegal Development Plan with particular reference to ensuring compliance with the most up-to-date iteration in the form of the Draft CDP 2018-2024. This approach is outlined in section 1.3 of the Draft LAP. It is noted that the referenced Guidelines are appropriately referenced in the Draft CDP 2018-2024.</p> <p>Recommendation: No change.</p> <p>6. Comments noted.</p> <p>Recommendation: No change.</p>
PB5		Department of Culture,	1. The Department's submission contains both general comments and also specific comments in relation to a site in	1. The general comments are addressed in this section of the report, and the town-specific

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		Heritage and the Gaeltacht, Development Applications Unit	<p>Carndonagh.</p> <p>2. To ensure consistency throughout the Local Area Plan document the Department would like it noted that the Department's name is "The Department of Culture, Heritage and the Gaeltacht".</p> <p>3. Would like it noted in the document that there are 17 Monuments (as opposed to 13) that are in State Care.</p> <p>4. Also notes that the term National Monument is used to describe Recorded Monuments throughout the document and would be grateful if this could be updated.</p>	<p>comments are addressed in the Carndonagh section of the report.</p> <p>Recommendation: No change.</p> <p>2. Noted.</p> <p>Recommendation: Edit the Draft LAP to refer to the Department as the 'Department of Culture, Heritage and the Gaeltacht.'</p> <p>This is a Non-Material Alteration – Ref. GENNMA12.</p> <p>3. The submission does not clarify the location of the section in the report that refers to the number of Monuments in State care and the relevant section cannot be identified. It is noted the Draft CDP accurately lists 17 Monuments that are in State Care.</p> <p>Recommendation: No change.</p> <p>4. Noted.</p> <p>Recommendation: To edit the LAP to replace the term Recorded Monument with National Monument.</p> <p>This is a Non-Material Alteration – Ref. GENNMA13.</p>
PB6		Irish Water	The Irish Water submission contains only specific comments in relation to five of the seven towns (An Clochan Liath;	These town-specific comments are addressed in the relevant town sections of the report.

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			Ballyshannon; Bridgend; Donegal Town and Killybegs.	
PB7		Derry City & Strabane District Council	<ol style="list-style-type: none"> 1. The submission contains both general comments and also specific comments in relation to Bridgend. 2. Acknowledges the context in which the Draft Plan has been drafted in an ongoing period of uncertainty in light of Brexit and a stated national economic context of demonstrating a return to economic growth. 3. Satisfied with the level of scope, detail and resultant findings of the Environmental Report. 	<p>1. The general comments are addressed in this section of the report, and the Bridgend-specific comments are addressed in the Bridgend section of the report.</p> <p>Recommendation: No change.</p> <p>2 And 3: Comments noted.</p> <p>Recommendation: No change</p>
PB8		Northern & Western Regional Assembly (NWRA)	<ol style="list-style-type: none"> 1. The submission notes that the LAP is being prepared in a period where the National Planning Framework (NPF) is nearing completion and where the process of preparing a Regional Spatial and Economic Strategy (RSES) has commenced and acknowledges that this has the potential to present challenges in terms of maintaining consistency with the National Spatial Strategy and the Border Regional Planning Guidelines and pre-empting what may be in the NPF and RSES. 2. The submission notes that the Draft NPF recognises that the Northern and Western Region has a weak urban structure and indicates that a number of towns with populations >10,000 will be targeted for higher population growth (40% growth up to 2040); with Letterkenny, Sligo and Cavan town being the three regional centres identified within the Border area. Beyond these centres the Draft NPF identifies approximate growth rates of 11-15%, although this may be subject to change. 3. The NWRA acknowledge the figures contained within the LAP and advise that the quantum of zoned land is coherent with the framework of the County Development Plan (CDP) 	<p>1-6. The positive comments of the NWRA are noted, in particular the conclusion that the Draft Local Area Plan is broadly consistent with the overall settlement strategy goals set out in the Regional Planning Guidelines. It is acknowledged that the content of the emerging National Planning Framework and Regional Spatial and Economic Strategy may have implications for the County Development Plan and Local Area Plan, and appropriate reviews will be undertaken to ensure that both documents remain consistent with national policy guidance. The comments of the NWRA in relation to the suggested identification of the Letterkenny/Derry area as a 'city region' are welcomed and are fully consistent with the Council's ambitions in the context of the North West Strategic Growth Partnership.</p> <p>Recommendation: No change.</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>and Regional Planning Guidelines for the Border area 2010-2022.</p> <p>4. With regard to Strategic Flood Risk Assessment, the NWRA submission notes the provisions in the Draft LAP whereby the Draft County Development Plan contains the strategic planning framework, objectives and policies for managing flood risk. The submission states that the proposal to address this issue in conjunction with the CDP appears to be reasonable, in the event that the CDP is operational at the same time, or in advance of, the Local Area Plan being adopted.</p> <p>5. The submission states that it is notable that the Draft NPF includes provisions for the creation of Metropolitan Area Strategic Plans for the 5 city regions, as part of the RSES process. The NWRA has in its submission to the Department suggested that Letterkenny/Derry be identified as a city region. The NWRA suggest that there may be an opportunity to develop a bespoke cross border Metropolitan Area Strategy Plan which may incorporate the corridor between Letterkenny and Derry and the village of Bridgend. However, it is noted that the finalisation of the NPF and RSES may ultimately be an important informant for the development of the Seven Strategic Towns subject of the LAP, as all Planning Authorities will need to review their Development Plans to ensure consistency with the RSES when it is finished.</p> <p>6. NWRA submission concludes by confirming that the Draft Seven Strategic Towns Local Area Plan 2018-2024 is broadly consistent with the overall settlement strategy goals set out in the Regional Planning Guidelines.</p>	
PB9		Department of Culture, Heritage and the Gaeltacht,	<p>1. Submission notes that our archaeological and built heritage needs to be protected, whilst continuing to facilitate the practical developmental requirements of a modern society such as the upgrading of services,</p>	<p>1-10. The contents of this submission have been noted and considered. The Draft LAP and Draft CDP contain a suite of policies and objectives that will serve to protect the archaeological and built</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
		Development Applications Unit	<p>transport infrastructure and associated urban/suburban developments. This can be practically implemented by incorporating policies and objectives into the Review of the Draft Seven Strategic Towns Local Area Plan 2018-2024 for County Donegal which allow for the protection of our Built, Archaeological and Underwater Archaeological Heritage.</p> <ol style="list-style-type: none"> 2. The recommendations contained in the submission apply, in general, to all of the towns subject of the LAP. Specific objectives and policies in relation to the Archaeological, Underwater and Built Heritage of each plan have not been provided, as the Department strongly recommends that the observations of the County Council's Heritage Unit (i.e. the Conservation Officer and Heritage Officer) be incorporated into each plan. 3. The Department strongly advises that the Council exclude known monuments from lands zoned for dense industrial and/or residential/educational developments, particularly with reference to lands zoned as Strategic Land Reserves, or large areas zoned for renewable energy developments or linear developments for services and transport. With regard to renewable energy developments, the Department would like to draw the Council's attention to the Department's new guidelines in relation to the archaeological assessment of the impact of Solar Farms. 4. The Council should highlight those sites of archaeological importance in Co. Donegal that are either in State or Local Authority Ownership or Guardianship, as any works in the vicinity of these monuments may require Ministerial Consent for development (irrespective of planning permission). 5. The LAP should have an over-arching objective to ensure the protection and preservation of the Archaeological, Built and Underwater Heritage which can then be expanded upon in a specific section relating to 	<p>heritage of the County, inclusive of an overarching objective to 'conserve and protect the County's archaeological heritage for present and future generations' (Objective AH-O-1, Draft County Development Plan 2018-2024). Policies are also in place to, inter alia, 'protect and enhance the integrity of Archaeological Monuments and their settings' (Policy AH-P-1) and to 'protect, where appropriate, the character and setting of any unrecorded archaeological object or site' (Policy AH-P-4). The policies of the Draft CDP also deal with underwater archaeology, historic graveyards, zones of archaeological potential and known battlefields and their settings. Overall therefore, the policies of the Draft CDP, which are fully applicable within the LAP boundaries, will ensure that features of archaeological importance within the County are preserved/recorded for posterity.</p> <p>Recommendation: No change.</p>

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			<p>'Archaeological, Built and Underwater Heritage' for each town– as follows: <i>It is an objective of Donegal County Council, as part of this Seven Strategic Towns Local Area Plan 2018-2024, to secure the preservation and setting of all sites, features and objects of archaeological interest, including all archaeological monuments included in the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1930-2014 (either by preservation in-situ or, as a minimum, preservation by record).</i> <i>The planning authority will have regard to the advice and recommendations of the Department of Culture, Heritage and the Gaeltacht with respect to archaeological recommendations and specific archaeological mitigation.</i></p> <p>6. The LAP should be clear in highlighting the possible planning restraints in relation to developments in proximity to archaeological sites and monuments, and the possibility that applicants/developers may be required to carry out archaeological assessments, including geophysical survey and/or excavation, in order to address any archaeological concerns.</p> <p>7. The definition of 'archaeological heritage' which includes all structures, constructions, groups of buildings, developed sites, recorded monuments and their settings, as well as moveable objects, that are situated both on land and underwater, should be listed within the LAP.</p> <p>8. Submission suggests general policies and specific objectives that might be included in the LAP in relation to the protection and preservation of features of archaeological importance, in addition to suggested 'general information' that could possibly be included.</p> <p>9. The submission recommends the insertion of a specific section in relation to areas zoned for large scale developments, such as renewable energy projects.</p>	

Ref	Town	Organisation /Group	Summary of points raised in submission	Response and Recommendations Arising
			10. The submission suggests that text be included in relation to Promotion/Education/ Awareness and Tourism/Community Initiatives, in the context of features of archaeological and historical importance.	

3 AN CLOCHÁN LIATH (DUNGLOE) SUBMISSIONS

3.1 Overview

A total of 26 submissions were received comprised of:

- 25 from members of the public; and
- 1 from prescribed bodies.

3.1.1 Public Submissions

Site zoning proposals solicited the greatest number of substantive submissions. In relation to this, a total of 15 such submissions were received. Seven of these (Ref. Nos. CL15, CL16, CL17, CL18, CL22 and CL 23), referred to eight no. residential sites. A further five submissions referred to the Masterplan site (Ref. Nos. CL6, CL7, CL14, CL15 and CL16). Finally, three submissions referred to the proposed site for Economic Development located adjacent to Randox (Ref. Nos. CL14, CL15 and CL24).

A second significant volume of submissions (16 in total) addressed issues that may be categorised as road, footpaths and cycling related. Within this group, pedestrian facilities/requirements attracted eight no. submissions (Ref. Nos. CL4, CL8, CL9, CL10, CL11, CL12, CL16 and PB4). Strategic roads proposals were suggested in four submissions (Ref. Nos. CL14, CL16, CL19 and CL21). Finally, a number of comments and suggestions were received in relation to greenways (Ref. Nos. CL3 and CL14).

A number of other important issues were raised including the following:

- Town centre issues including casual trading (Ref. Nos. CL3, CL13, CL14 and CL16);
- The provision of the Irish language on signage (Ref. Nos. CL16 and CL20); and
- The Marina proposal identified in the Draft LAP (Ref. Nos. CL2).

3.1.2 Prescribed Bodies

A submission was received from the Transport Infrastructure Ireland (TII) (Ref. No. PB4) which directly relates to An Clochán Liath (Dungloe) and raised 4 specifics. Namely: the proposed Masterplan site, the proposed pedestrian link on the N56 Carnmore Road, the pedestrian link/recreation footpath proposed crossing the N56 east of the proposed Masterplan lands and the Glenties-Dungloe Greenway referred in association with improvements to the N56.

3.2 Other Issues Arising

3.2.1 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of consulting engineers to prepare a Stage 2 Strategic Flood Risk Assessment in respect of the seven towns covered by the Local Area Plan. Following completion of this report, it has been noted that the text relating to Opportunity Site 3 (Ref. No. CLMA1), will have to be amended to ensure compliance with the principles outlined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities, (2009)'. These issues are addressed in the recommendations below.

Opportunity Site 3

The site was identified in Stage 2 Strategic Flood Risk Assessment as being at risk of flooding and as such a Justification Test was conducted by the appointed Flood Consultants. This concluded that the site would be acceptable for 'less vulnerable' land uses as set out in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities,(2009), and also that the finished floor level of

buildings should be raised above flood levels. Also, all proposals for development must be accompanied by a site specific Flood Risk Assessment, prepared in accordance with the guidelines set out in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities, (2009).

Recommendation:

1. Amend Policy CL-TC-3 as follows; (new text shown in blue, text to be deleted shown in strikethrough)

Policy CL-TC-3: "It is a policy of the Council to consider proposals for retail/commercial development on Opportunity Site 3 where it can be demonstrated that the massing, footprint and height of the proposal, and the nature of the proposed uses(s), are compatible with the adjoining properties. Proposals shall provide for widening of the adjacent road and improvements to the Main Street junction. Proposals shall be required to demonstrate that they shall not give rise to any flood risk **by means of a site specific Flood Risk Assessment**. In this regard, proposals for residential development are ~~unlikely to be~~ **will not be** acceptable. **The finished floor levels of buildings shall be raised above predicted flood levels** ~~in accordance with Section 2.23 of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities, (DoEHLG, 2009)."~~

2. Amend text in Opportunity Site 3: North of the River paragraph on p. 26 (new text shown in blue, text to be deleted shown in strikethrough)

Opportunity Site 3: North of the River

Moderate size site of 0.62ha directly north of Dungloe river outside but adjoining the retail core area. The site is bound along the northern side by a narrow road which provides access from the Town centre to Dungloe Pier. ~~A large part of the southern portion of the site falls within Flood Zone C~~ **Flood Zone A** as identified in **Stage 2 Strategic Flood Risk Assessment Report CFRAMS map**. As such the Justification Test ~~was applied as part of this Report will apply for any development~~ as per the Planning System and Flood Risk Management-Guidelines for Planning Authorities (2009). **The site was subject to, and passed, a development plan 'justification test' for 'less vulnerable' land uses such as commercial activity. It is considered that the site provides some retail or cafe style riverside potential but must provide pedestrian accessibility along this riverside linking the amenity waterfront areas to the west. Any development proposals should provide pedestrian accessibility to the 'Riverwalk' walkway located to the north east of this site, along the river to the waterfront amenity areas to the west. Any proposal shall include proposals to widen the access road towards the north east of the subject site. There is also potential for linking these 2 amenity areas which could be used by the inhabitants of An Clochán Liath and could attract visitors into the town. Policy CL-TC-3 refers. "Any proposals for development must be accompanied by a site specific flood risk assessment, prepared in accordance with the guidelines set out in 'The Planning System and Flood risk Management Guidelines for Planning Authorities, (2009)"**

This is a Material Alteration – Ref. CLMA1

Table 3.1: An Clochán Liath (Dungloe) Submissions

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
PUBLIC SUBMISSIONS				
CL1	Des McCarry	<p>1. There is a missing link in the Carnmore footpath west from the GAA pitch which is putting a lot of people in danger and it is vital that the path is completed asap. Despite there being no footpath, several people walk along the verge on their way to Supervalu. The construction of the path will greatly improve sight lines for traffic emerging from the properties the onto main road.</p> <p>2. Masterplan area adjacent to Supervalu - part of this site should be zoned as low or medium density residential. This would provide for additional residential development within easy walking distance of services.</p> <p>3. Greenways and river walk - the Glenties greenway could approach Dungloe via Cloughwally, the Diamond and the Caravan Road instead of continuing along the N56 as far as Dungloe Lake. This alternative route would have a number of benefits for its users: a. It would take people off the N56 at Cloughwally thereby improving their safety and that of other road users, b. It would also provide for a more scenic</p>	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>1. Noted and agreed. Section 4.7 of the Draft LAP identifies a number of vital gaps in the town's walking and cycling network. These identified gaps include the missing section of footpath on the Carnmore Road as referred to in the submission. (See bullet point 4 on p31 of the Draft LAP). It is envisaged that this footpath would be constructed subject to the identification of funding.</p> <p>Recommendation: No change.</p> <p>2. Noted. Refer to response for submission CL6 below.</p> <p>3. Policy CL-TMR-1 of the Draft LAP seeks the provision of suitably designed pedestrian walkways and cycleways at the locations identified on the Land Use Zoning Map. The routes identified are indicative only. It is considered that An Clochán Liath merits an overall assessment of greenway opportunities and that this study could include an assessment of the route suggested in the submission.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>approach to Dungloe, c. this route could connect to the existing River walk at Lidl by travelling along the Chapel Road and turning left after the Community School.</p> <p>4. The existing River walk is not shown correctly on the drawing and the recent extension loop is not shown at all. The drawing should be amended to correct the errors.</p> <p>5. The River walk should be upgraded to shared path standard and be incorporated into the Greenway route.</p> <p>6. A new Greenway link could be constructed connecting the River walk to the N56 east of Loch Fada and Cois Locha Housing estate. It could then run east along the N56 for a short distance and turn left onto the Sheskinarone road and continue on through Sheskinarone to Meenbanad where it could connect with the Burtonport to Letterkenny Railway walk/Greenway at Meenbanad.</p>		<p>4. Noted. The information is correct and identifies an error on the Land Use Zoning Map. This requires to be rectified in accordance with the recommendation below.</p> <p>Recommendation: Amend identification of River Walk to show accurate route of walk on northern side of river and extend Local Area Plan Boundary to run immediately parallel to the re-positioned route on its northern side.</p> <p>This is a Material Alteration - Ref CLMA2.</p> <p>5. See response to submission Ref. CL1(3) above.</p> <p>6. See response to submission Ref. CL1(3) above.</p> <p>Recommendation: No change.</p>
CL2	Forbairt Na Rosan	The extensive Marina shown is not viable due to cost and that a lagoon type	No	Policy CL-TMR-2 of the Draft LAP states that the Council supports the principle of a 'marina-type' development. Whilst

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>structure for sports and recreation for locals and tourists alike and would be more viable and would enhance the shorefront.</p>		<p>this does not explicitly include a Lagoon development, it is considered that such a use would not be precluded by the policy. However, in the interests of clarity the recommendation below proposes minor edits that should address the concerns expressed in the submission.</p> <p>Recommendation: Amend Policy CL-TMR-2 and associated text as follows; (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>(i) Policy CL-TMR-2: "It is a policy of the Council to support the principle of a marina-type development Leisure/Amenity/Tourism type development in An Clochán Liath (Dungloe) subject to compliance with Habitats Directive, environmental considerations and all other relevant objectives and policies of this LAP".</p> <p>(ii) Amend the following text on the 2nd paragraph on p. 35 as follows:</p> <p>Marina Site "Consistent with the tourism and leisure role and function of An Clochán Liath (Dungloe), the town's position on the route of the Wild Atlantic Way, and the growing water-based tourism and leisure sector, DCC supports the principle of a marina-type development Leisure/Amenity/Tourism type development in the vicinity of the shorefront area of the town. A possible site for such a development in the vicinity of the town pier is identified on the Land Use Zoning Map (Map 2 refers). Such a development would complement the leisure uses already development and remaining to be developed in the shorefront area of the town".</p> <p>This is a Material Alteration – Ref. CLMA3.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
CL3	Youth Participation Advisory Group	<p>1. A cinema would provide entertainment and work for locals.</p> <p>2. A public swimming pool would provide great benefits.</p> <p>3. Need for basic amenities at beach, e.g. toilets, showers, boardwalks</p> <p>4. Outdoor amenities needed - e.g. parks, skate park, gym equipment for public use, bus shelters, market areas, river walk with better surfacing, bins for dog waste, energy efficient lighting along Greenways, tag walking schemes, cycle paths and access to bikes.</p> <p>5. Faster and more affordable fibre internet required. Not enough competition in this sector.</p> <p>6. Business: Encourage more food, clothes, theatre and late opening hours to bring life into the town.</p> <p>7. Rural transport needs to be enhanced, e.g. student rates for secondary students as well as third level.</p>	No	<p>1-7. The submission contains a range of positive proposals, all of which would enhance the overall town experience. Notwithstanding, the provision of several of the suggested items are beyond the remit of the Council including the cinema, digital connections, business interests, bus shelters and rural transport. In respect of those issues, the objectives and policies of the Draft LAP have been formulated to provide an appropriate, positive and facilitatory planning policy context that would allow for positive consideration of such proposals as and when they were forthcoming. In respect of the remaining proposals, the provision of the public swimming pool is not included in any Council Capital programme. With regard to the remaining items, the Draft LAP does not preclude the provision and/or improvement of these facilities. Again, the identification of funding is the critical factor in the provision of these services.</p> <p>Recommendation: No change.</p>
CL4	Molly McCarry	<p>1. The Draft Plan already includes for the provision of a pedestrian link on Carnmore Road. A section of this path has recently been completed. However, the missing link in the path is putting a lot of people in danger and it is vital that the path is completed ASAP.</p>	No	<p>Refer to response to submission Ref CL1(1) above.</p> <p>Recommendation: No change</p>
CL5	Forbairt Na Rosann	<p>Forbairt Na Rossan is concerned about the proposed limits of the zoning map for Dungloe. The outer town limits are similar</p>	<p>Yes</p> <p>See separate folded map for</p>	<p>Noted. However the LAP must be consistent with the County Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the County Development Plan</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>to those proposed under the 1988 Dungloe Development Plan and it is considered that it is time to further extend these limits. An expansion of the town boundaries would allow wider scope for economic development opportunities. In the event that the boundaries were extended in accordance with the suggestion in the submission, the proposed 'Relief Road' in the 1988 Draft Map for the town would be much more centrally located to serve the larger area.</p>	<p>An Clochán Liath (Dungloe) (Map 2)</p>	<p>2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including An Clochán Liath whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. The proposed boundary limits as identified in the submission would be entirely disproportionate to the existing built-up area and realistic potential of An Clochán Liath (Dungloe). In this regard Objective CS-O-12 of the Draft CDP is considered particularly relevant:</p> <p>"To require growth of towns in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure to the benefit of local communities and effective urban growth."</p> <p>In this context, it is considered the submission to further extend the limits is not warranted.</p> <p>Recommendation: No change.</p>
CL6	Pat the Cope Gallagher	<p>1. Submission requests that a portion of the Masterplan site be zoned Primarily Residential (specifically the plot between the N56 and running adjacent the football field and north towards the river). It is contended that the site is well located in relation to schools, amenities and shops and would provide additional residential potential for the town. The submission notes that residential zoning should have regard to potential flood risk in the area.</p> <p>2A The submission accepts the need for having a Masterplan for the overall area but does not accept that the Planning Authority</p>	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>Noted. It is considered appropriate to address the two sub issues identified in the submission in one collective response, given that they are so closely inter-related.</p> <p>Point 1 of the submission requests that a section of the overall site, specifically the plot contained between the N56 and running adjacent to the football field, is zoned for residential development. It is acknowledged that such a zoning was identified in the County Development Plan 2012-2018 (As Varied), and also the Draft County Development Plan, 2018-2024. However, it should be noted that this sub-area provides the only readily identifiable access to the Masterplan site. Given the relatively narrow width of this plot (the plot narrow to 45m or thereby at its northern end) the zoning of this site for a residential development unrelated to the broader masterplan</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>should only "envisage predominately community and leisure related activities". The submission notes the central location, proximity of the town and 'sensitivities of walk' constructed on lands owned by the author of the submission. In terms of the remainder of the Masterplan area, it is contended that flexibility of approach should be used. The lands offer the only potential for future expansion of the Community Hospital and local businesses and the submission states that we should be careful not to curtail the natural and future expansion of business.</p> <p>2B The submission requests that a more flexible interpretation be worded for the areas of the Masterplan site that border existing business, the hospital or centres of importance to the town.</p>		<p>site/concept could weaken the case for securing a suitable access through the sub area to the main part of the Masterplan site to the rear. Retaining this sub-area within the overall Masterplan site would avoid such a possibility arising. At the same time, to do so would not preclude the achievement of residential development on the sub area subject to a Masterplan layout being brought forward that identified not only housing in the sub-area but also a suitably designed junction and access road arrangement to serve not just the aforementioned housing but also the broader Masterplan area to the rear. It should be noted that the concept as just described would be consistent with the narrative and Policy in the Draft LAP, where it was demonstrated in the Masterplan the residential element would be ancillary to the broader uses envisaged for the site, and where it could be demonstrated that the residential element would be a major contributor to the 'opening up' of the remaining Masterplan lands to the rear. Finally, another benefit of the above noted approach would be that prospective purchasers of any such houses will be made aware at the outset of possible future additional uses and associated traffic.</p> <p>Recommendation: No change.</p> <p>The second aspect of the submission is that 'a broader more flexible Masterplan interpretation be adopted by the local authority to allow for the natural expansion of the town centre and existing businesses or activities which currently are located adjacent to or along the boundary...' The Draft LAP provides that the Planning Authority will consider proposals for predominately community and leisure-related uses, including those that are associated or compatible with the adjacent hospital and GAA uses. The Draft LAP also provides that 'A Masterplan may identify alternative, compatible uses where such</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>uses would be clearly ancillary to the aforementioned primary uses'.</p> <p>With regard to the proposal that the Masterplan should also allow for the natural expansion of the town centre, the N56 and the established development alongside the road on the Masterplan side of the road presents a major barrier between the town centre and the site and it is considered that these constraints would render the achievement of any meaningful integration with the existing town centre extremely difficult.</p> <p>Finally, in terms of the suggestion that the Masterplan should also allow for the expansion of existing businesses or activities which currently are located adjacent to or along the Masterplan site, the policy as currently worded (Policy CL-TMR-3) does already explicitly provide for the expansion of the main adjacent uses, namely the Hospital and the GAA. Notwithstanding, it is agreed that the policy wording should be modified to allow for expansion of other adjacent uses where such developments would not be contrary to other aspects of the Plan.</p> <p>(See also response to submission Ref. CL15(5) below)</p> <p>Recommendation: Amend Policy CL-TMR-3 and associated text as follows; (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>Policy CL-TMR-3: "It is a policy of the Planning Authority to consider proposals for predominantly community and leisure-related uses, including those that are associated or compatible with the adjacent Hospital and GAA uses within the site identified as 'Masterplan Site' on the Land Use Zoning Map. Proposed developments shall only be considered in the context of a submitted Masterplan for the entire area and the Masterplan may identify alternative, compatible uses where</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>such uses would be clearly ancillary to the aforementioned primary uses. Proposed extensions to established uses adjacent to the Masterplan area may also be considered where it can be clearly demonstrated that such development would not prejudice the achievement of the overall Masterplan concept and predominant uses therein, subject to compliance with the other objectives and policies of this Plan. Proposals for development shall:</p> <ul style="list-style-type: none"> a) Have regard to the CFRAMS An Clochán Liath (Dungloe) Fluvial Flood Extents mapping flood zone proposals shall be accompanied by a site specific flood risk assessment, prepared in accordance with the guidance set out in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009); b) Identify a suitable pedestrian access onto the N56/Carnmore Road side of the site; and c) Identify a suitable river crossing to the 'Riverwalk' amenity route." <p>This is a Material Alteration - Ref CLMA4.</p>
CL7	Rosses Athletic Club	<p>1. The submission highlights the strong membership numbers of both the Rosses Athletic club and Tir Chonaill Rugby club with limited training facilities and further states that the LAP provides an opportunity to provide a permanent home for the Rosses Athletic Club and Tir Chonaill Rugby Club and to make Dungloe the new home for athletics and rugby in west Donegal. Particular reference is made to the Masterplan site and in this regard the submission notes Objective CL-TMR-1,</p>	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>1-2. Noted. However, the nature of the uses proposed by the submission is already provided for in principle and not precluded by 'Community and Leisure Related uses' as supported in the wording of the Draft LAP's Policy CL-TMR-3. The identification of specific facilities will be a matter for consideration through the development of a detailed Masterplan.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>which states that 'it is an objective of the Council to develop and maximise the tourism and leisure potential of An Clochán Liath....'</p> <p>2. It is requested that the text of Section 4.9 of the Draft LAP is amended to include reference to the development of an athletics/running track and a co-located rugby playing pitch within the Masterplan site.</p>		
CL8	Tom Grannell	Submission expresses support for the completion of the footpath on the Carnmore Road, in the interests of improving the amenities and public safety of Dungloe.	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>Refer to response to submission Ref CL1(1) above.</p> <p>Recommendation: No change</p>
CL9	John Paul Doherty	Submission expresses support for the completion of the footpath on the Carnmore Road, in the interests of improving the amenities and public safety of Dungloe.	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>Refer to response to submission Ref CL1(1) above.</p> <p>Recommendation: No change</p>
CL10	Anita Meehan	Submission expresses support for the completion of the footpath on the Carnmore Road, in the interests of improving the amenities and public safety of Dungloe.	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe)</p>	<p>Refer to response to submission Ref CL1(1) above.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
			(Map 2)	
CL11	Peadar Doherty	1. Submission expresses support for the completion of the footpath on the Carnmore Road, in the interests of improving the amenities and public safety of Dungloe.	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	Refer to response to submission Ref CL1(1) above. Recommendation: No change
CL12	Bridget O'Donnell	1. The submission relates to the proposed Indicative Zebra Crossing point and questions how the crossing can be performed prior to the adoption of the LAP and without consultation of landowners. 2. The submission also requests that the Indicative Zebra Crossing be removed and relocated or written confirmation is acquired from the Council that a proposed alternative will find favour.	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	1-2. The position of the proposed zebra crossing point identified in the Draft Seven Strategic Towns LAP 2018-2024 was indicative only and thus subject to re-location in the event that a more suitable position was identified. A detailed survey carried out by the councils Roads Section identified the position of the now constructed zebra crossing as the optimum position. All required procedures were followed during this process. It should be noted that the zebra crossing will not necessarily prevent development of the correspondent land in the future as it may be possible to re-locate the structure in the event of a future application, subject to normal detailed considerations. Recommendation: No change.
CL13	An Garda Siochana	1. The submission recommends that a Casual Trading Area is zoned at Lower Main Street in the car park at the rear of the Stepping Stone.	No	1. Noted. However, the identification of additional casual trading sites is a county-wide issue requiring a county-wide approach. The identification of a casual trading site for An Clochán Liath (Dungloe) would be most appropriately pursued as part of this broader initiative. Recommendation: No change

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>2. The submission recommends a proposal that any new proposals for Fast Food outlets in the town boundary have restricted opening hours between 01:00 and 08:00 to reduce antisocial behaviour.</p>		<p>2. Noted. However a policy of imposing such restrictions as a standard condition is considered inappropriate for a town centre where social disorder issues are most appropriately addressed under other legislation. Rather, it is considered more appropriate to consider such proposals against the provisions of the Draft County Development Plan Policy GEN-TC-2. The policy reproduced below for ease of reference.</p> <p>Policy GEN-TC-2: "It is a policy of the Council that any proposal for commercial or retail use within a town centre area, in addition to other policy provisions of this LAP, will be required to demonstrate compliance with all of the following criteria –</p> <ul style="list-style-type: none"> (i) The proposed development is compatible with surrounding land uses existing or approved; (ii) The proposed development would not harm the amenities of nearby residents; (iii) There is existing or programmed capacity in the water and wastewater infrastructure or suitable developer-led improvements can be identified and delivered; (iv) The existing road network can safely handle any extra vehicular traffic generated by the proposed development or suitable developer-led improvements are identified and delivered to overcome any road problems; (v) Adequate access arrangements, parking, manoeuvring and servicing areas can be provided in line with the Development and Technical standards set out in the Draft CDP or as otherwise agreed in writing with the planning authority; (vi) The proposed development would not create a noise nuisance; (vii) Any emissions from the proposed development can be dealt with in accordance with relevant standards; (viii) The proposed development would not adversely affect important features of the built heritage or natural heritage

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>including Natura 2000 sites; (ix) The proposed development is not located in an area at flood risk and/or will not cause or exacerbate flooding; (x) The site layout, building design, associated infrastructure and landscaping arrangements are of high quality and assist the promotion of sustainability and biodiversity; (xi) Appropriate boundary treatments and means of enclosure are provided and any proposed areas of outside storage are adequately screened from public view; (xii) The proposed development would not compromise water quality nor conflict with the programme of measures contained within the current North Western River Basin (NWIRBD) Management Plan".</p> <p>Recommendation: No Change</p>
CL14	DUNGLOE Community Network and DUNGLOE Tidy towns Committee	<p>1. The submission request amendments including undergrounding of cables within the town boundary</p> <p>2. Local vehicular access developed west of upper main street to enable business owners to access lands and alleviate parking and deliveries on Main Street.</p>	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>1. Noted and Agreed. The undergrounding of cables within the town centre boundary would undoubtedly enhance the visual appearance of the centre. This aspiration is envisaged in, and provided for, under Objective CL-TC-1 where it states "...to provide for the enhancement of An Clochán Liath (DUNGLOE) Main Street by means of an environmental improvement scheme that would address, inter alia, street clutter..."</p> <p>Recommendation: No change.</p> <p>2. The concept of opening a vehicular access to the rear of business premises on upper main street is not without merit, but at this time remains a long term strategic vision. It should be noted that Policy CL-TC-1 does provide that "...incorporate a service lane for delivery vehicles servicing the associated Main Street properties."</p> <p>Recommendation: No Change</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>3. The submission states that Identification of ring road or upgrading of existing road should be included in the plan. The submission provides a potential candidate road in this regard of Crucknageragh Road as this roads runs east of the Quay Road and is heavily populated.</p> <p>4. The proposed Economic Development area should be removed as these lands are in private ownership and the area rezoned as Environment. The Economic Development zone should be on lands east of the 'Established Economic Development'</p> <p>5A Access from north of the town should be via Fairhill 5B Junctions at Fairhill, Barrack Brea, Carnmore Road, Greenes Corner, top of the town needs design development.</p> <p>6. Town boundary should be extended at Crucknagerragh to include lands at Dungloe Crèche.</p>		<p>3. The proposal is not without merit but is considered to be a long term objective that, in the absence of any detailed assessment cannot be supported in the Plan at this time.</p> <p>Recommendation: No change.</p> <p>4. Noted. Refer to response under submission Ref CL24 below.</p> <p>5A&B. It is noted that traffic congestion in and around the town is of concern. The Draft LAP (p30) has identified a preferred Industrial/H.G.V. route around the north of the town to direct heavy traffic and alleviate the town centre. This will be achieved by means of directional signage. The identification of a small vehicle route into the town from the N56/'The Angle' junction along 'The Angle' road as far as it junction with Pole road and then south along Pole Road between the junction of 'The Angle' and Pole Road and down to the junction of Pole Road/Burtonport Road.</p> <p>Recommendation: No change.</p> <p>6. Noted. Having regard to the proximity of the site to the existing LAP boundary and to the fact that the site is adjacent to established residential areas, it is considered that the site does</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>7. Riverwalk identified on the wrong side of river on map and should be corrected.</p> <p>8. Parking provision needs to be identified for cars using Library and Old Chapel 'Ionad Teampall Croine'.</p> <p>9. Riverhouse B&B lands should be included in the town centre.</p> <p>10. Requests that footpaths are included at A. Caravan Road. B. Supervalue TO Chapel lane N56, C. Cope Builders Providers TO</p>		<p>merit inclusion within the LAP boundary.</p> <p>Recommendation: Amend the boundary of the town and zone these lands as 'Established Development' as identified on the map entitled 'Proposed Material Alterations CLMA5' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. CLMA5.</p> <p>7. Noted. Refer to response under submission Ref. CL1(4) above.</p> <p>8. Limited car parking at the library/Old Chapel is available along the road frontage but no other Council lands are available at this time. It is considered that Council free car parking in the town and other parking is sufficient at this time.</p> <p>Recommendation: No change.</p> <p>9. Noted. Having regard to the proximity of this area to the existing Town Centre zoning and to the fact that the area is clearly delineated on the east side by the N56, and to the north by the Dungloe river, it is considered that the area does merit inclusion with the 'Town Centre.'</p> <p>Recommendation: Amend the zoning of lands from 'Established Development' to 'Town Centre' as identified on the map entitled 'Proposed Material Alterations CLMA6' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. CLMA6.</p> <p>10. Several of these footpaths sections are already identified in the Draft LAP. The received proposals are not without merit but</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Dungloe Fairhill-Sheskinarone D. Barrack Brae TO Angle Road, E. Pole Road Junction TO Randox Entrance, F. Quay road.</p> <p>11. The submission states that Lighting and Walking verge along Dungloe By-pass be provided (link Pole Road TO Sheskinarone Road)</p>		<p>are subject to funding being made available.</p> <p>Recommendation: No change.</p> <p>11. Noted. These matters are outside the remit of the LAP but have been referred to the Roads Directorate for further assessment.</p> <p>Recommendation: No change.</p>
CL15	Campbell's Auctioneers	<p>1. Re: Site PR7 (Primarily Residential), states that these lands are Sale Agreed for residential care units and should be looked at further.</p> <p>2. Site Opp 4 has been recently acquired, is currently being developed, and is no longer available.</p> <p>3. Large PURPLE land area at Pole Road is not available</p> <p>4. Green lands on Sheskinarone Road towards the Cope Builders should be zoned PR due to their locations, access and location of Main Services.</p>	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<p>1. The information provided in relation to tenure is noted. Notwithstanding, this information is of insufficient weight to justify or require any amendment to the zoning contained in the Draft LAP. It should also be noted that the development of residential care units is not precluded by the zoning.</p> <p>Recommendation: No change.</p> <p>2. The information provided in relation to site acquisition is noted. Notwithstanding, this information is of insufficient weight to justify or require any amendment to the zoning contained in the Draft LAP.</p> <p>Recommendation: No change.</p> <p>3. Noted. Refer to response under submission Ref CL24 below.</p> <p>4. Noted. However the LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county,</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>5. Masterplan area is not feasible due to poor access and onus on one individual wishing to develop within this site to create a masterplan. Guidance and expertise from the council should be identified.</p>		<p>including An Clochán Liath (Dungloe) whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town.</p> <p>Recommendation: No change.</p> <p>5. Noted. It is acknowledged in the Draft LAP (p35) that the identification of the site is long term in nature and that there would be significant constraints to development to be overcome. It remains the opinion of the Executive that the site does have "significant potential because of its size, proximity to the town centre and proximity to the river walk amenity". The concerns expressed in relation to the preparation of the Masterplan itself are acknowledged and the Council will explore with all relevant stakeholders, the most appropriate model for the development of an acceptable Masterplan, inclusive of the Council taking a proactive , lead role in the project.</p> <p>It is also acknowledged that the inclusion of the word 'aspirational' in the narrative in the Draft LAP that addresses the Masterplan site (p35) may be misleading as it may be interpreted as a lack of real Council support for the proposal. This issue could be addressed by substituting the word 'Long Term' for the word 'aspirational'.</p> <p>Recommendation: Amend the text in the third paragraph on p.35 (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>"...Whilst the identification of this site is aspirational 'Long</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>Term' in nature, and whilst there would be significant constraints to development to be overcome, Donegal County Council nevertheless considers the site to have significant potential because of its size, proximity to the town centre, and proximity to the River Walk amenity (although any development would have to have full regard to the setting and sensitivities of the Walk and adjacent River)."</p> <p>Refer also to response under submission Ref. CL6 above.</p> <p>This is a Non-Material Alteration – Ref. CLNMA1.</p>
CL16	<p>Public Meeting</p> <p>Issues raised as forwarded by email by Marie Therese Gallagher on the 17/01/2018</p>	<p>Public meeting held with the following issues raised:</p> <ol style="list-style-type: none"> 1. Designated trading area should be identified 2. Clarification sought on the implication for planning permission on land opposite the new traffic claiming island on the N56. 3. Lands should be identified for the development of Health Services adjacent to the hospital campus. 	<p>Yes</p> <p>See separate folded map for An Clochán Liath (Dungloe) (Map 2)</p>	<ol style="list-style-type: none"> 1. Noted. However, the identification of additional Casual trading sites is a county-wide issue requiring a county-wide approach. The identification of a casual trading site for An Clochán Liath (Dungloe) would be most appropriately pursued as part of this broader initiative. <p>Recommendation: No change.</p> <ol style="list-style-type: none"> 2. Noted. See response to submission Ref. CL 12 above. 3. The lands located adjacent to the hospital campus are included within the Masterplan site. Any development proposals within the Masterplan site will be subject to Policy CL-TMR-3 where it is the policy to allow proposals for community or leisure related uses. In this regard the development of Health Services facilities adjacent to the hospital campus would be compatible with this policy at this location. <p>Recommendation: No Change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>4. Masterplan area should be removed and re-designated as Local Environment.</p> <p>5. Lands classed as Environment between Gweedore Road and Sheskinarone Road should be re-designated primary residential.</p> <p>6. Town Boundary should be extended as per Forbairt na Rosann map submission.</p>		<p>4. Noted. See response to submission Refs.CL15 (5) and CL6 above.</p> <p>5. Noted. However the LAP must be consistent with the County Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including An Clochán Liath (Dungloe) whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town.</p> <p>Recommendation: No Change.</p> <p>6. Noted. However the LAP must be consistent with the County Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including An Clochán Liath (Dungloe) whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. The proposal boundary limits as identified in the submission, would be entirely disproportionate to the existing built-up area and realistic potential of An Clochán liath (Dungloe). In this regard Objective CS-O-12 applies which states "To require growth of towns in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure to the benefit of local communities and</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>7. Policy to have signage in Irish should be deleted. Signage should be choice of business owners.</p> <p>8. Lands should be reserved for future traffic management to enable link between N56 North and N56 South.</p>		<p>effective urban growth." In this context, it is considered the submission to further extend the limits will not be considered.</p> <p>Recommendation: No change.</p> <p>7. Noted. An Clochán Liath (Dungloe) has a strong Gaeltacht heritage and this is reflected in its designation as a Gaeltacht Service Town. In this regard the Council is guided by The Official Languages Act 2003 as referenced in section 9.7 of the Draft Donegal Development Plan (p176) where it states that "All Business/Community Signage in the Gaeltacht shall be either Irish only or Bilingual in nature with Irish first". This is supported by Policy CL-TC-4 of the Draft LAP where it is the policy that proposals for shop fronts shall be in Irish.</p> <p>Recommendation: No Change.</p> <p>8. The proposal is noted and is considered to be a long term vision. In the absence of any feasibility or route selection studies, it would not be appropriate to identify such strategic road route as this time. However the traffic problems in An Clochán Liath (Dungloe) are acknowledged and resulted in the identification of the Industrial/HGV route around the north of the town and the southern traffic management route to direct traffic from the N56 (to east of the town) to Main Street along Chapel Road to avoid the junction of Main Street and Carnmore Road. This will be achieved by means of directional signage and as such the N56 already operates as a partial ring road to alleviate traffic problems.</p> <p>Recommendation: No change.</p>
CL17	Francie McGovern	The lands marked 'X' should be zoned a primary residential (map attached)	Yes See separate	Noted. However the Draft LAP must be consistent with the County Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the County

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
			folded map for An Clochán Liath (Dungloe) (Map 2)	Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including An Clochán Liath (Dungloe) whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town. Recommendation: No change.
CL18	Conor Greene	1. Town Boundary to be extended along the N56 to include lands (map attached) 2. To extend the town boundary to east of the N56 to include lands (Map attached)	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	1-2. Noted. However the Draft LAP must be consistent with the County Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including An Clochán Liath (Dungloe) whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. The proposal boundary limits as identified in the submission, would be entirely disproportionate to the existing built-up area and realistic potential of An Clochán Liath (Dungloe). In this regard Objective CS-O-12 applies which states " <i>To require growth of towns in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure to the benefit of local communities and effective urban growth</i> ". In this context, it is considered the submission to further extend the limits will not be considered. Recommendation: No change.
CL19	Paul Gillispie	Query on why there is no consideration for the N56 as a ring road to bypass Dungloe	No	The traffic problems in An Clochán Liath (Dungloe) are acknowledged and have been identified. The Draft LAP includes

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		and alleviate the traffic problems of the Main Street.		<p>significant traffic management proposals including the Industrial/HGV route around the north of the town and the southern traffic management route to direct traffic from the N56 (to east of the town) to Main Street along Chapel Road to avoid the junction of Main Street and Carnmore Road. The N56 already operates as a partial ring road and these measures will help to further alleviate the pressures on Main Street.</p> <p>Recommendation: No change.</p>
CL20	Rory Cleary	All Road signs need to be Dual language	No	<p>Noted. The Council note that An Clochán Liath (Dungloe) has a strong Gaeltacht heritage and this is reflected in its designation as a Gaeltacht Service Town. In this regard the LAP is guided by section 9.7 of the Draft Donegal Development Plan (p176) where it states that "<i>All Signage erected by public bodies shall abide by the provisions of the Official languages Act 2003</i>".</p> <p>Recommendation: No change.</p>
CL21	Paul Chamberlain	Consideration is given to using the Quay Road extending along the seafront to join up with the Burtonport Road exiting Dungloe as this would open the seafront and by pass Main Street.	No	<p>The proposal is noted and is considered to be a long term vision. In the absence of any feasibility or route selection studies, it would not be appropriate to identify such strategic road route as this time. However the traffic problems in An Clochán Liath (Dungloe) are acknowledged and resulted in the identification of the Industrial/HGV route around the north of the town and the southern traffic management route to direct traffic from the N56 (to east of the town) to Main Street along Chapel Road to avoid the junction of Main Street and Carnmore Road. This will be achieved by means of directional signage and as such the N56 already operates as a partial ring road to alleviate traffic problems.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
CL22	Pat Boyle	Requests to designate subject lands (map attached) as Primarily Residential.	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	The 'backland' nature of the site and the absence of a readily identifiable access precludes the identification of the site as 'Primarily Residential'. Notwithstanding, the favourable location of the site is noted and the provisions of Policy GEN-H-1 and Policy GEN-H-2 provide a balanced support for the principle of residential development on such Established Development zone. Recommendation: No change.
CL23	Peter Smith	Inclusion of lands inside the town limits and designate subject lands (map attached) as Primarily Residential.	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	The reasonable proximity of this site to the centre of An Clochán Liath (Dungloe) is noted. However, the site is severely constrained by the absence of any readily identifiable access of sufficient dimensions to serve the traffic that would be generated by a site of this scale. Recommendation: No change.
CL24	Daniel McGee	Removal of 'Economic Development' zoning and rezone as 'Local Environment'	Yes See separate folded map for An Clochán Liath (Dungloe) (Map 2)	Noted. This site was included in the Draft LAP to solicit public opinion, including that of the landowners. Given the strategic direction of An Clochán Liath (Dungloe), namely as an important market service town and tourist destination, the securing of the subject site for the proposed Economic Development use is not considered critical to the future of the town, particularly in light of the intentions of the landowners as articulated in this submission. Recommendation: (a) Amend the zoning of lands from 'Economic Development' to 'Local Environment' as identified on the map entitled 'Proposed material Alterations CLMA7', contained at the end of this section of the report. (b) Remove Policy CL-ED-1 as follows; (new text shown in blue, text to be deleted shown in strikethrough)

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>Policy CL-ED-1: "It is a policy of the Council to consider proposals for the development of Class 3 (Offices), Class 4 (Light Industrial), research and innovation, and digital technologies on Economic Development Site 1 (ED1) (located to the south of the Radox etc complex, refer to Map 2), subject to compliance with the undernoted criteria, and all other relevant policies of the LAP. Proposals shall only be considered in the context of a Masterplan for the overall site. In Draft Seven Strategic Towns Local Area Plan 2018-2024 Chapter 4: An Clochán Liath (Dungloe) Page 29 exceptional circumstances, proposals for minor development may be considered in the absence of an agreed Masterplan."</p> <p>(ii) Delete 2nd paragraph in section 4.5.1 as follows:</p> <p>"The Radox complex is located in a wider industrial area that extends across an area of some 6.85 hectares. It is the opinion of the Council that the presence, stature and success of such a company is something that could be developed further to the overall benefit of the town. For this reason, and in the context of the preferred industrial/hgv traffic route around the north of the town (refer Section 4.7.1), a significant area of additional lands for economic development is identified adjacent to the area of town in which the Radox plant and other industrial uses are already situated. The identified area is also served by a potentially suitable road and junction onto the Regional Road although some surfacing, footpath and public lighting would be required. The established economic development area and the proposed economic development area would provide for a total of 13.95 hectares of such land. Any future application for significant development on these additional lands shall include an overall 'Masterplan' for the overall site."</p> <p>This is a Material Alteration – Ref. CLMA7.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
CL25	Daniel O'Brien	The submission objects to a pedestrian route at the rear of property at Quay Road.	No	Noted. There are indicative proposals to develop a foreshore footpath as a recreational amenity for the town. Donegal County Council will comply with all the statutory requirements in developing such proposals, inclusive of public participation and direct approaches to individual landowners as and where necessary. Recommendation: No change
PRESCRIBED BODIES SUBMISSIONS				
PB 4	TII	<p>1. The submission references Section 2.11 of the DoECLG Spatial Planning and National Roads Guidelines and advises of the policy to avoid the creation of additional access points for new development or the generation of increased traffic from existing accesses onto National Roads where the speed limit applies. The submission also states the following;</p> <p>TII consider there is a requirement to review the proposed Masterplan Objective and associated text as outlined in Policy CL-TMR-3 as the site is located where the 100kph speed limit applies. TII recommends review of the Masterplan lands.</p> <p>2. In relation to Section 4.7 Transportation and Movement, the proposal of a pedestrian link on the Carnmore Road is identified. Although the pedestrian link is</p>	No	<p>1. Noted. However, inspections confirm that the site access will not in fact be taken in a restricted speed zone area.</p> <p>Recommendation: No change.</p> <p>2. Noted. The TII will be consulted in advance of such proposals.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>within the 50kph zone, TII recommends that such objectives be developed complementary to the strategic function of the national road network and subject to consultation with the agreement of TII.</p> <p>3. Pedestrian Link/recreational footpath proposed crossing the N56 east of the proposed Masterplan lands at a point where the 100kph applies with significant road safety concerns to be resolved and as such TII would welcome a review of the proposed objective to acknowledge the required safety concerns</p> <p>4. In relation to section 4.9.1 (Glenties to Dungloe Greenway) TII clarify that they are not delivering a greenway in Donegal and a review of the relevant text should clarify this. Also, TII recommends consultation with the Donegal NRDO to ensure road schemes are reflected in the Draft LAP.</p>		<p>Recommendation: No change.</p> <p>3. Noted. The pedestrian link/recreation footpath crossing the N56 is within the 50kph zone and not in the 100kph zone as stated in the submission. However, the TII's concerns regarding the identification of a crossing point at the location of the Masterplan site are acknowledged and agreed in the interests of traffic and pedestrian safety particularly in light of the recently constructed section of footpath along the GAA front.</p> <p>Recommendation: Amend the indicative footpath link at this location as identified on the map entitled 'Proposed Non-Material Alteration CLMNA2' contained at the end of this section of the report.</p> <p>This is a Non-Material Alteration - Ref CLNMA2.</p> <p>4. Noted. Refer also to response under submission CL1(3) above.</p> <p>Recommendation: No change.</p>

4 BALLYBOFEY-STRANORLAR SUBMISSIONS

4.1 Overview

A total of 34 submissions were received comprising of:

- 33 from members of the public
- one submission from prescribed bodies

4.1.1 Public Submissions

The 33 public submissions cover a broad spectrum of differing issues throughout the plan area that are for the most part site specific and zoning related.

7 public submissions requested site specific rezoning of various sites to Primarily Residential or Low Density Residential to facilitate multiple residential developments. The response is provided in Table 4.1 below.

Economic Development was referenced in 4 submissions; 1 relating to small home based economic development policy, 1 for the rezoning of a site to facilitate economic development and 2 in relation to the large Strategic Economic Development Opportunity (site 1) in the eastern portion of the Draft LAP. Other economic related submissions highlighted the relationship of urban design, heritage and town centre vitality in the context of how it positively contributes to the vibrancy and quality of the town centre and hence the success of its economic function. The response is provided in Table 4.1 below.

General issues addressing recreation and amenity from 14 submissions, reflect the envisaged role and strategic vision of the Draft LAP for Ballybofey/Stranorlar, to build upon its strong recreational, tourism and hospitality offer and also further enhance the Twin Towns as a sought after place to live and work. The response is provided in Table 4.1 below.

Strategic access points along the Donegal Road were raised in 4 separate submissions and relating to a location along the National Primary, Donegal Road; and 3 submissions referenced flooding issues. The response is provided in Table 4.1 below.

4.1.2 Prescribed Bodies

Of the 9 submissions from prescribed bodies, Transport Infrastructure Ireland (TII) was the only submission that specifically referenced Ballybofey/Stranorlar, this is summarised and responded to in Table 4.1 below.

4.2 Other Issues Arising

4.2.1 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of Consulting Engineers to prepare a Stage 2 Strategic Flood Risk Assessment (SFRA) in respect of the seven towns covered by the Draft Local Area Plan. Following completion of this report, a number of issues were identified in relation to various sites within the Ballybofey/Stranorlar Plan boundary. Where these issues refer to lands the subject of public submissions, they are responded to in respect of the individual submission in Table 4.1 below. Responses to other issues raised which do not relate to the public submissions are set out below.

Opportunity Site 6

The SFRA delineates pluvial flooding in portions of OPP Site 6 along the watercourse, and thereby recommends the rezoning of these areas for recreation and amenity. On the basis that it is likely that the site would fail a Justification Test for the 'built development' uses (ie. economic development, or expansion of the hospital) proposed in the relevant Policy BS-ED-1, and having regard to the proximity of the adjacent hospital complex, this recommendation is agreed.

Recommendation:

Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA1' contained at the end of this section of the report from 'OPP Site 6' to 'Recreation and Amenity'.

This is a Material Alteration – Ref. BSMA1.

Lands Zoned as 'Community Site', Mill Brae

The SFRA identifies significant portions of the southern part of this site as being located within lands identified as Flood Zones A and B. On the basis that this zoning could facilitate the development of educational and health uses, which uses are categorised as 'Highly Vulnerable' uses, a development plan-Justification Test was conducted. The outcome of this test was a recommendation to rezone the areas identified at being of risk of flooding to amenity and water compatible uses. This recommendation is agreed.

Recommendation:

Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA2' contained at the end of this section of the report from 'Community' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. BSMA2.

Residential Site PR1

The SFRA delineates Flood Zone A encroaching within a narrow strip along the eastern fringes of this site. On the basis that residential use is classed as 'Highly Vulnerable, retention of the residential zoning of that part of the site could only be sustained on foot of a development Plan Justification Test. However, it is considered that the site would fail any such Justification Test. It is therefore recommended to amend the zoning of this narrow strip of the eastern part of the site to 'Recreation and Amenity'. The small scale of the change in area (0.069Ha) would result in minimal changes to the overall housing land supply and as such will have no impact on the land supply set out in the Core Strategy.

Recommendation:

Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA3' contained at the end of this section of the report from 'Residential' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. BSMA3.

Residential Site PR6

The SFRA delineates Flood Zone A encroaching within the eastern portion of this site, which part of the site is located closest to Lough Alaan. On the basis that residential use is classed as 'Highly Vulnerable', retention of the residential zoning of that part of the site could only be sustained on foot of a development Plan Justification Test. However, it is considered that the site would fail any such Justification Test. It is therefore recommended to amend the zoning of this part of the site to 'Recreation and Amenity'. The recommendation also provides for the necessary rezoning and the consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA4 contained at the end of this section of the report from Primarily Residential PR6' to 'Recreation and Amenity' and also to make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):
 - (i) Amend table 5.1 contained in chapter 5, page 48 to reflect the reduction in site area and potential number of housing units to be delivered as a result of the proposed amendments.

This is a Material Alteration - Ref. BSMA4.

2. Make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):
 - (i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;
 - (ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.

This is a Material Alteration – Ref. GENMA1.

Opportunity Site 1

The SFRA identified almost all of the site as falling within Flood Zone A. However, having regard to the prime and strategic town centre location of the site, and to the 'retail, commercial or tourism' uses supported in the relevant Policy BS-TC-1, it was considered appropriate to conduct a development plan Justification Test for this site. This Test is included in the SFRA report and concludes that the site passes the justification test for development of 'less vulnerable' land uses such as those identified in the Policy. The Report recommends that the text should be amended to provide that the flood risk assessment already referenced in the policy should explicitly consider residual risks of flooding and attenuation of rainfall during flood events (when flap valves are closed).

Recommendation:

1. Delete third para. of Section 5.4.2 and replace with the undernoted text (text to be deleted shown as ~~strikethrough~~ and proposed new text is blue).

~~Most of the lands fall within Flood Zone B as per 'The Planning System and Flood Risk Management Guidelines', November, 2009 as identified in the CFRAMS. There is also an issue with the capacity of the storm sewer network. Accordingly, a comprehensive flood risk assessment shall be required for any development proposals in this area. The identification of the site within Flood Zone B, and the prime town centre location, determines that only retail and commercial uses shall be considered~~

~~having regard to the contents of Para. 3.5 of the aforementioned Flood Risk Guidelines. Other uses above ground floor level shall be considered on their own merit.~~

Opportunity Site 1 was one of a number of sites specifically assessed in more detail in the SFRA report on the LAP, owing to its strategic location within the town centre. Almost the entire site is identified as lying within Flood Zone A, and reported occurrences of storm sewers surcharging during flood events on the River Finn have been referenced in the report. A justification test was carried out and concluded that development of 'less vulnerable' uses in this town centre location could be facilitated in accordance with the 'The Planning System and Flood Risk Management Guidelines', November 2009' dependent on the preparation of a detailed flood risk assessment of the Masterplan area that should explicitly consider residual risks of flooding and attenuation of rainfall during flood events.

2. Amend Policy BS-TC-1 as follows (text to be deleted shown as ~~strikethrough~~ and proposed new text is blue).

Policy BS-TC-1: "It is a policy of the Council to consider proposals for retail, commercial or tourism development on Opportunity Site 1; or for development providing for a combination of some, or all, of the aforementioned uses, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals shall only be considered in the context of a comprehensive masterplan, a comprehensive flood risk assessment (and appropriate mitigation measures as appropriate), and a comprehensive traffic impact assessment (and appropriate mitigation measures as appropriate). **Any flood risk assessment shall explicitly consider residual risks of flooding and attenuation of rainfall during flood events.**"

In exceptional circumstances, proposals for minor development may be considered in the absence of a Masterplan where the Planning Authority is satisfied that the overall masterplan approach will not be prejudiced.

The design principles set out below shall form the basis of the terms of reference for a masterplan to guide and inform development of the site:

- a) Design shall be of high quality, innovative and modern in architectural form so as to provide for landmark buildings and to contribute positively to the urban form.
- b) Proposals shall provide for a strong riverside frontage along the eastern side of the site.
- c) Proposals shall incorporate sufficient car parking to serve the proposed development. In this regard, internalised multi- storey car parking will be encouraged in order to make most efficient use of this brownfield site.
- d) With specific reference to the current Finn Park part of the site, a layout that provides for sufficient set back of frontage at Navenny Street so as to make sufficient provision for a public footpath and associated public lighting and drainage.

This is a Non-Material Alteration Ref - BSNMA1.

Opportunity Site 5

The SFRA identifies a significant portion of the site as falling within Flood Zone A. However, having regard to the prime and strategic town centre location of the site, and to the 'retail, commercial or tourism' uses supported in the relevant Policy BS-TC-1, it was considered appropriate to conduct a development plan Justification Test for this site. **A justification test was carried out and concluded that development of 'less vulnerable' uses in this town centre location could be facilitated in accordance with the 'The Planning System and Flood Risk Management Guidelines', November 2009' dependent on the preparation of a detailed flood risk assessment of the Masterplan area that should explicitly consider residual risks of flooding and attenuation of rainfall during flood events.**

Policy BS-TC-5 in the Draft LAP also supports the principle of other town-centre compatible uses, however residential development will not be permitted within the identified Flood Zone area.

Recommendation:

1. Insert the following text at the end of text of Opportunity Site 5: Back Road, Ballybofey, Section 5.4.2 to read as follows (proposed new text shown in **blue**):

Opportunity Site 5: Back Road, Ballybofey

These lands are situated in the town centre core on either side of Back Road and are generally comprised of multiple vacant and derelict properties, many of these forming the rear curtilages of commercial properties fronting onto Main Street. The area also contains a small number of commercial and residential properties. Whilst the central parts of this area are generally rundown in appearance, the area is 'book-ended' at either end by quality developments in the form of Jackson's Hotel in the west, and the Villa Rose Hotel and new Butt Hall Centre to the east. The area is accessed by, and bisected by, the narrow Back Road. Access onto Back Road from the west is via Glenfin Street, but access on its eastern side is not possible at present except for a sub-standard narrow and low archway road onto Main Street. The development pattern in the area does not allow for a two-way road system along the entire Back Road area. However, DCC considers that it is a reasonable objective to seek to achieve a two-way road system from the western edge of Back Road as far as the Villa Rose Hotel roundabout, with the possibility of a one-way road from the roundabout for continuing east-bound traffic linking back up to the Main Street. The Council will encourage the land assembly of the site or part of the site, by a private developer, with a view to the preparation of a masterplan for the redevelopment and regeneration of the area. Policy BS-TC-5 refers.

The SFRA identifies a significant portion of the site as falling within Flood Zone A. Having regard to the prime and strategic town centre location of the site, a development plan Justification Test was conducted for this site and concluded that the site passes the justification test for development of 'less vulnerable' land uses such as those identified in the Policy. The Report recommends that the text should be amended to provide that the flood risk assessment already referenced in the policy should explicitly consider residual risks of flooding and attenuation of rainfall during flood events (when flap valves are closed).

Policy BS-TC-5 in the Draft LAP also supports the principle of other town-centre compatible uses. Such uses might include residential development and therefore it would be advisable to clarify that residential development will not be permitted within Flood Zone areas.

2. To insert the following text into the first paragraph of Policy BS-TC-5 (text to be deleted shown in ~~strikethrough~~, proposed new text shown in **blue**):

It is a policy of the Council to consider proposals for retail, commercial or tourism development on Opportunity Site 5; or for development providing for a combination of some, or all, of the aforementioned uses, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Other town centre-compatible uses shall also be considered in the context of a comprehensive Masterplan, that shall be accompanied by a detailed flood risk assessment of the Masterplan site in accordance with the 'The Planning System and Flood Risk Management Guidelines', November 2009'. Any such Flood Risk Assessment shall consider residual risks of flooding and attenuation of rainfall during flood events (when flap valves are closed).

~~comprehensive flood risk assessment (and appropriate mitigation measures as appropriate), and A comprehensive traffic impact assessment (and appropriate mitigation measures as appropriate) shall~~ also be submitted as part of any proposed development within the Masterplan site. In exceptional circumstances, proposals for minor development may be considered in the absence of a Masterplan

where the Planning Authority is satisfied that the overall Masterplan approach would not be prejudiced.

1. Proposals shall not prejudice the achievement of the Council's road and pedestrian/cycle access through this area as detailed in Objective BS-TC-2 above.
2. Development shall incorporate sufficient car parking to serve the proposed development. In this regard, internalised multi- storey car parking will be encouraged in order to make most efficient use of this brownfield site.
3. Development shall make provision for the indicative linked walkway along the River Finn frontage and shall incorporate appropriate areas of seating and proposals for hard and soft landscaping.
4. Design shall ensure that strong street frontages are provided along either side of Back Road.
5. [In general, residential development will not be permitted within Flood Zone areas within the lifetime of this Plan unless otherwise varied/superseded.](#)

This is a Material Alteration Ref - BSMA5.

Economic Development Site ED3

The SFRA identifies a significant portion of this site as being located within Flood Zone A and B. These areas extend along the entire northern portion of this site, and also include 2 areas in the south of the site at interfaces with both 'Local Environment' and 'Established Development' zonings. The Report recommends dezoning the identified dezoning flood areas. The dezoning would allow for the 'softening' of the visual impact of the economic area on this important approach into Ballybofey and, for these reasons, the recommendation is agreed as contained below.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA6' contained at the end of this section of the report from 'Economic Development ED3' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. BSMA6.

Table 4.1: Ballybofey-Stranorlar Submissions

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
PUBLIC SUBMISSIONS				
BS1	Paul Anderson	1. Section 5.1 of the Draft LAP does not mention of the two Boxing clubs, Tennis Club, 3 swimming pools, power lifting club plus a number of gyms, pilates studios etc which would strengthen the value of the area being a sports hub.	No	<p>1. The Draft LAP already makes reference to many of the existing sporting facilities within the plan area. Section 5.3 sets out the Strategic Vision for the Twin Towns stating "That by 2024, Ballybofey/Stranorlar will have an enhanced reputation as a sporting centre of excellence and as a key centre of recreation and hospitality for the County.....". Similarly, Sections 5.1, 5.2, 5.4.1, 5.8.1, 5.8.2, 5.8.3 and Policy BS-TR-1 all recognise the sporting significance of the town both presently and for its future development. Notwithstanding, it is agreed that this Section could be further strengthened with the addition of text reflecting the point made in the submission.</p> <p>Recommendation: Insert the following text as an amendment to paragraph 4 in section 5.1 (new text shown in blue):</p> <p>'The Towns are distinguished by their tradition in sporting activities having regard to the location of Finn Harps Football Club, the Donegal County GAA Headquarters, Ballybofey-Stranorlar Golf Club and Finn Valley Athletic Centre and adjacent Finn Valley Leisure Centre opened in 2013. Further evidence of the sporting activities in the Towns can be found in the various local sports clubs including clubs for boxing, tennis and power lifting club, plus a number of gyms, pilates studios and so on. Other facilities such as the River Finn, Drumboe Woods and Trusk Lough as examples, are important recreational amenities for the towns. The Towns</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>2. Section 5.1 of the Draft LAP does not define the community sector which includes the Parish Centre, Planet Youth Club, Scout Den, Foroige, Men's Shed, Community Garden, Twin Towns Lost & Found Dogs rescue etc.</p> <p>3. Section 5.4.2 of the Draft LAP omits where the Heritage is in Ballybofey and fails to mention the largest Heritage Site on the main street the old Balor Theatre/Ritz Cinema. The submission refers to an application for demolition of the Balot Theatre/Ritz Cinema which was refused</p>		<p>are also renowned for the strength of its hospitality industry, with three iconic hotels being located in the Town centres, and also its retail offer with a particular focus on the nationally-recognised McElhinney's Department Store.</p> <p>This is a Non-Material Alteration - Ref . BSNMA2.</p> <p>2. Although Section 5.2, Key Planning Issues, bullet 5, references "the identification of a sufficient amount of land for other purposes such as recreational and community uses", it is agreed that the Draft LAP makes no reference to the existing community sector and that this omission should be rectified in Section 5.1 of the Draft LAP as below:</p> <p>Recommendation: Insert the following text as paragraph 5 in Section 5.1: In addition to the valued sporting and recreational resources available in the Twin Towns, a strong and vibrant community sector also exists as evidenced in the many community and voluntary groups that contribute significantly to the quality of life for all residents in the towns, across a spectrum of elements including built heritage, health, activities and benefits to society amongst others.</p> <p>This is a Non-Material Alteration - Ref. BSNMA3.</p> <p>3- 4. In the context of striking the appropriate balance between The importance of the built heritage, architectural and social character of the streetscape, aesthetically and structurally in general terms is recognised as being of the utmost importance in both the Draft County Development Plan (the primary policy document in the County), and also the Draft LAP. Section 3.7 of the Draft LAP outlines the</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>permission on the grounds that it would result in the loss of a structure of architectural and social value and would diminish the character of the streetscape at this location.</p> <p>4. The submission also fails to mention the other shops that have been left to fall into disrepair and impact on the overall appearance of the Main Street. What does the Plan intend to do about this?</p> <p>5. The submission questions the lack of consultation regarding the future use of the Ritz Cinema by the Butt Hall Committee. It is stated that the community have many ideas for the future use of the site including a skate park, a town park, community centre or cinema.</p>		<p>detailed built heritage policy framework that will apply to all seven towns addressed in the LAP, whilst the built heritage is also specifically referenced in Section 5: Ballybofey-Stranorlar at Section 5.2, bullet point 2, and at Section 5.4.1, paragraph 4. Notwithstanding this, it is agreed that the incorporation of specific reference to the built heritage of the twin towns would raise the profile of this important factor, and this is addressed in the recommendation below.</p> <p>Recommendation: Insert the following text as an additional bullet point (end bullet point) in section 5.2 of the Draft LAP (new text shown in blue):</p> <ul style="list-style-type: none"> The further enhancement of the streetscape of the Twin Towns, having particular regard to the treatment of historic and traditional buildings and vernacular groupings/ terraces. <p>This is a Non-Material Alteration - Ref. BSNMA4</p> <p>5. The Balor Theatre, as referenced specifically in the submission, is a good example of the sensitivity of the built heritage issue, and the challenges faced by local authorities in balancing objectives to re-invigorate our towns with preserving the important heritage resource. In 2015, the Planning Authority made a balanced decision to refuse an application for the demolition of the building (which decision was upheld by An Bord Pleanala). In the context of the aforementioned sensitivities and required balances, the Council would be willing to explore options with the owners of this property for a progressive resolution at this site.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
BS2	Secretary of the Corcam Residents and others Ivan Knox	<ol style="list-style-type: none"> 1. The submission relates to a historical rezoning (2004/2005) of agricultural lands (c. 21.5 acres) with a postal address of Corcam, Killygordon in the Parish of Donoughmore, Castlefin to the Parish of Stranorlar, townland of Trennamullen, Stranorlar. These lands were zoned out of one parish and into another to facilitate a development by an engineering firm under the Ballybofey/Stranorlar 2000-2008 Draft Plan. The submission claims that this rezoning was carried out by Elected Members and the public were not notified or given a chance to make submissions in relation to same. The submission provides a detailed history in relation to further rezoning of lands from rural residential to light industrial in the townland of Corcam. 2. The submission refers to a family home/property at Corcam which has experienced extensive flooding over the years. It is claimed that the flooding dates back to road works carried out by Donegal Co. Co. on the N15. However, the Council has always contended that the flooding issue is caused by the neighbouring farm. Mr Temple has carried out extensive works to prevent further flooding but to no avail. Mr Temple believes the Council is responsible for resolving the flooding issue. 3. The submission refers to a further flooding issue in an old laneway caused by the 	No	<ol style="list-style-type: none"> 1. Noted. The <u>parishional</u> location of any lands is of no relevance in either the formulation of statutory land use plans and their boundaries, or in the detailed policies, proposal and zonings to be contained therein. Rather, Plan boundaries and policies and zonings therein can only have regard to material land use planning issues, regardless of parish boundary considerations. Thus in this case, whether the subject lands are, or were, in either the Parish of Donoughmore or Stranorlar is of no relevance in the preparation of previous or future land use plans for Ballybofey/Stranorlar. Recommendation: No change. 2 and 3: Noted. Reference is made to historical flooding events allegedly arising from physical roadworks carried out by DCC. These issues are outwith the remit of the Plan. However the comments have been referred to the Roads Directorate. Recommendation: No change.

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>resurfacing of the N15. It is claimed that the Council has not responded to the issue and it needs to be resolved.</p> <p>4. The submission refers to work by the Roads Authority to improve the section of the N15 at the Corcam Corners. This work requires written consent of the landowner to carry out soil testing on his land. The submission states that such consent will only be provided once all of the 'demands' in this submission are met - which will allow changes to be made in the Finn Valley.</p> <p>5. The submission states that the Ballybofey-Stranorlar Map which accompanies the Draft LAP is too small and not legible. It also queries what the abbreviation SEDOS (1) on the Map means and what the brown box in the middle of SEDOS means. The submission also states that the disputed lands referred to in Item 1 above is shown on the Map and that this should now be removed as the rezoning of those lands lapsed in 2008 when the previous Ballybofey-Stranorlar 2002-2008 Town Area Plan expired.</p>		<p>4. Noted. These are detailed procedural matters dealt with through the subject Corcam bends Improvement Project, and are outwith the scope of the LAP.</p> <p>Recommendation: No change.</p> <p>5. The size and scale of the Land Use Zoning Maps are considered appropriate and legible. The land use zoning legend is clearly contained in the map and both SEDOS (1) and the 'brown box' are fully contained within.</p> <p>It is correct to state that the re-zoning of these lands lapsed when the previous Ballybofey/Stranorlar LAP, 2005-2011 expired. However, a new plan is now being prepared and the entire Ballybofey/Stranorlar area is being considered afresh. Arising from this new consideration, DCC agreed that the subject site would be identified in the Draft LAP as a Strategic Economic Development Opportunity Site.</p> <p>Recommendation: No change (refer also to response to Submission Ref. BS24 below)</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
BS3	Gerard Grindel on behalf of parents Denis & Margaret	Request for removal of amenity zoning from property (c. 1.25acres) at Drumboe Lower, Stranorlar which consists of an existing dwelling house and adjoining lands. It is contended that the amenity zone is impacting negatively on the value of the property. The amenity zone restricts their son from building a house on the subject lands in the future. The subject lands are unplanted and do not form part of Drumboe Wood and therefore should be unzoned similar to the lands to the east of their property.	Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)	<p>This site is a large residential curtilage containing an existing dwelling and shed and a large rear garden area. Having regard to the established use, and to the fact that this plot does not form part of the adjacent wooded area, it is agreed that the inclusion of this plot within the 'Amenity'- zoned area is erroneous and should be rectified. The site abuts a cluster of houses on small plots that are all in an area zoned as 'Established Development'. Having regard to the existing nature of the site and existing adjoining zoning, this site would be more appropriately zoned as 'Established Development'.</p> <p>Recommendation: Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA7' contained at the end of this section of the report from 'Recreation and Amenity' to 'Established Development.'</p> <p>This is a Material Alteration- Ref. BSMA7.</p>
BS4	Anne Morrow	<ol style="list-style-type: none"> <li data-bbox="501 928 1057 1209">1. The submission supports the rezoning of their lands from 'Recreational Amenity and Open Space' to 'Green' (No Map provided of subject lands). The submissions states that the proposed 'green' zoning of the subject lands ensures their personal privacy, allows them to continue farming and will allow the family to build on the land in the future. <li data-bbox="501 1264 1057 1412">2. The submission refers to a previous rezoning of the subject lands to 'Recreational Amenity and Open Space' to facilitate the development and extension of the Golf Course, which was approved by 	No	<p>1-3 Comments noted.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Councillors despite the Planners advice not to rezone it. It is stated that the Councillors should not have been allowed to go against the Planners advice and rezone the subject lands.</p> <p>3. The submission also supports the 'Residential' zoning of lands in their ownership at Admiran as well as other zonings at Dunwiley.</p>		
BS5	Clara Mason	The submission supports the 'Green' zoning of her grandmother's land at Castlebane and the fact that the family will be allowed to build on the subject lands in the future [see BS4 above].	No	(See response to Submission BS4 above.)
BS6	Wendy and Mark Mason	The submission supports the 'Green' zoning of their mothers land at Castlebane and the fact that the family will be allowed to build both farm buildings and houses on the subject lands in the future [see BS4 above].	No	(See response to Submission BS4 above.)
BS7	Andrew Mason	The submission supports the 'Green' zoning of his grandmothers land at Castlebane and the fact that the family will be allowed to build on the subject lands in the future [see BS4 above].	No	(See response to Submission BS4 above.)

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
BS8	Amy Paige Mason	The submission supports the 'Green' zoning of his grandmothers land at Castlebane and the fact that the family will be allowed to build on the subject lands in the future [see BS4 above].	No	(See response to Submission BS4 above.)
BS9	Barry McCullagh McCullagh Architecture & Surveying Ltd on behalf of Louise Cooney	The submission refers to his Clients' recent refusal for permission at the subject property to change the use of part of the lower ground floor of an existing dwelling to use as a beauty salon (Planning Ref: 17/51394] on the grounds that the property is not located within the town centre. The property is however located within the settlement boundary of the town. The submission requests that an objective be included in the Draft LAP to allow for small home based enterprises within the settlement envelope similar to Policy ED-P-13 in the Draft CDP which allows small scale, home based enterprises (c. 1-2 employees) in rural areas.	Yes. See separate folded map for Ballybofey/Stra norlar (Map 3)	<p>The suggestion to provide a policy base within which to consider the facilitation of small home based enterprises is considered appropriate and would be consistent with a similar approach to such development in the rural areas, as referenced in the submission. It is therefore recommended that the following new policy be included in Section 3.4.3 of the Draft Plan (pertaining to all 7 towns), as Policy GEN-ED-6. This would provide for a measure of consistency with Draft CDP Policy ED-P-13 (refers to small businesses in the rural area) as amended by Member's resolution and published as Material Alteration 4 for public consultation dated February 2018.</p> <p>Recommendation: Insert new policy in Section (new text shown in blue):</p> <p>GEN-ED-6: It is a policy of the Council to consider proposals for home-based businesses of a limited scale, of circa 1-5 employees, within an existing dwelling, or the curtilage of a dwelling and having regard to all other material planning considerations.</p> <p>This is a Material Alteration - Ref. GENMA3.</p>
BS10	Barry McCullagh McCullagh	The submission requests that his Clients lands be rezoned from the proposed 'Amenity' zoning in the Draft LAP to a land use zoning	Yes. See separate folded map for Ballybofey/	The subject site is zoned 'Amenity' within an overall area zoned as 'Local Environment' and was formerly used as playing pitches by a local sports club. 'Established Development' abuts this site

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	Architecture & Surveying Ltd on behalf of Lorna Barron	that shall allow small scale development such as one-off housing or similar small scale economic development. Historically the subject lands were utilised as a football training ground but that use has since ceased. Planning Ref: 14/50998 permitted the change of use of the clubhouse to a domestic dwelling. In addition there is a commercial garage development located on the southern boundary. A submission was also made to the Draft CDP to have these lands rezoned.	Stranorlar (Map 3)	to the east, although this is visually and physically removed from this site and is accessed from a different road closer to Ballybofey. It is agreed that the 'Recreation and Amenity' zoning is no longer appropriate in this area as the lands are no longer used as playing pitches and that a 'Local Environment' zoning is more appropriate. Recommendation: To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA8' contained at the end of this section of the report from 'Recreation and Amenity' to 'Local Environment'. This is a Material Alteration - Ref. BSMA8.
BS11	Barry McCullagh McCullagh Architecture & Surveying Ltd on behalf of Denis & Margaret & Gerard Grindel	Request for rezoning of the Clients' property (c. 1.25acres) at Drumboe Lower, Stranorlar which consists of an existing dwelling house and adjoining lands from 'Amenity' zoning to 'Established Development' or something similar. It is contended that the amenity zone is impacting negatively on the value of the property. The amenity zone restricts their son from building a house on the subject lands in the future who was recently refused planning permission to construct a dwelling house on the subject lands (Planning Ref: 17/50679). The subject lands are unplanted and do not form part of Drumboe Wood and therefore should be unzoned similar to the established residential lands to the east of the subject lands. [See BS3]	Yes. See separate folded map for Ballybofey/ Stranorlar (Map 3)	Refer to response to submission Ref. BS3 above.

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BS12	Carr & Company Civil Engineers on behalf of Brendan Dunleavy	<p>The submission asks why the subject lands at Glenfin Road, Ballybofey have been rezoned from 'Primarily Residential' in the previous LAP (2008-2014) to 'Amenity' in the Draft LAP. The submission requests that the lands as shown on the attached map be changed back to the 'Primary Residential' zoning for the following reasons:</p> <ul style="list-style-type: none"> • The lands are located in an established residential area of Ballybofey with access off Glenfin Road and benefit from existing services. • A recent digital survey of the lands has identified that the majority of the subject lands are above the 1,000 year flood level as provided for in the CFRAM Report for the River Finn at this location. A small portion of the subject lands are below the 100 year flood level; the submission states that the owners are happy for this area to be zoned 'River Corridor/Amenity'. • The owners have had discussions with the adjoining landowner to the South East and West and have agreed to co-operate on any future development of the subject lands. • Development of the subject lands as residential is consistent with the strategic objectives for housing in the Ballybofey LAP 2008-2014 and the current CDP 2012-2018. 	<p>Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>The points made in support of the proposal, including the site zoning history, and its proximity to other established residential areas, are noted. In relation to the zoning history, a more rigorous assessment of housing proposals is now required than would have been so required for previous Local Area Plans for Ballybofey/Stranorlar. The LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar, whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town and having regard to other factors most notably in this case, (i.) the local environment and (ii.) flooding.</p> <p>In terms of criterion (i.), the subject lands are located between the River Finn and an existing amenity/recreational walkway that runs from the Glenfinn Road towards Drumboe Woods. The provision and maintenance of recreational facilities is recognised as an important element in the Strategic Vision of the Draft LAP wherein it is identified that the Twin Towns will, inter alia, "...have (an) enhanced reputation as a centre of recreation and hospitality within the county.....also as an attractive place to live and work...". It is considered that the noted walkway and associated environment makes a significant contribution to the achievement of this vision. Regarding the second criterion, the comments in relation to flooding are noted. On foot of the points made in the submission the Flood Consultants were asked for</p>

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				<p>specific comments in relation to this area. The consultants note that much of the site is located within Flood Zone A and B and thus would be inappropriate for residential development. They also note that approximately 61% of the 'site' is located within Flood Zone C and therefore would be suitable for residential development. It is also noted that the entire frontage across which vehicular access would be taken is located in Flood Zone A.</p> <p>In conclusion, it is considered that the balance in this case lies in favour of not amending the Draft LAP having regard to the availability of other more suitable sites and to the amenity and (partial) flooding issues as discussed above.</p> <p>Recommendation: No change.</p>
BS13	Carr & Company Civil Engineers on behalf of Paul Murphy, Secretary of Butt Hall Committee re: lands at Town Centre	The submission relates to a site (c.3.5 acres) in the town centre owned by the Butt Hall Committee. The subject site contains a portion of the flood relief embankment protecting Ballybofey. The submission requests that a specific zoning be provided for the flood relief embankment on the Butt Hall Lands and for the full extent of the embankment	Yes. See separate folded map for Ballybofey/ Stranorlar (Map 3)	<p>Comments noted. Given that the embankments are a standalone physical feature in the town, it is not necessary or appropriate to provide a zoning for this structure. Notwithstanding, it is agreed that the presence of the embankments could be given stronger reference in the Plan as an informative and this is addressed in the recommendation below in the Donegal Town section of the report (ref. GENMA2) and the broad recommendation therein regarding an overall adjustment to Section 3.6: 'Flood Risk Management' .</p> <p>The relevant extract from the revised Section 3.6 is provided in blue below for ease of reference.</p> <p>('As an informative, an additional map is also provided below identifying the extent of the flood embankments in the centre of Ballybofey.')</p>

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				Recommendation: (Other than the changes recommended elsewhere in the document) No change.
BS14	Carr & Company Civil Engineers on behalf of Paul Murphy, Secretary of Butt Hall Committee re: Lands at Sessiaghoneill	The submission relates to a site (c.4 acres) located in Sessiaghoneill which adjoins the Northern Point Business Park to the west and that is owned by the Butt Hall Committee. The site was zoned 'Primarily Residential' in the previous LAP (2008-2014). It is zoned 'Local Environment' under the Draft LAP 2018-2024. The submissions requests that the subject site be rezoned to either 'Industrial' or 'Opportunity Site' to allow for industrial development in the town. The submission recognises that there are issues with flooding to the northern portion of the site.	Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)	<p>The SFRA report identifies a significant portion of the northern part of the site as being within Flood Zone A. On the basis that the economic development uses as proposed in the submission are classed as 'Less Vulnerable' in the Flood Guidelines, and that the principle of such use is not precluded in Flood Zone A but should be subjected to a development plan-Justification Test, the SFRA Consultants were requested to conduct such a test. The Consultants recommend that the lands in Flood Zone A should be rezoned to 'Recreation and Amenity'. This recommendation is agreed.</p> <p>With regard to the principle of economic development on the remainder of the site, the site is located within a largely rural area with a pattern of one-off residential development. Development in the adjacent industrial park is acknowledged but the re-use of this redundant site was considered to be acceptable on balance due to the sustainable benefits of re-using an established brownfield. Vehicular access to the subject site is through a network (substandard in parts) of minor county roads that would not have the carrying capacity to accommodate traffic associated with an industrial development at this location.</p> <p>Recommendation: To amend the zoning of the portion of this site as identified on the map entitled 'Proposed Material Alteration BSMA9' contained at the end of this section of the report from 'Local Environment' to 'Recreation and Amenity'.</p> <p>This is a Material Alteration - Ref. BSMA9.</p>

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BS15	Carr & Company Civil Engineers Submission No. 1 on behalf of Paul Murphy	<ol style="list-style-type: none"> 1. The submission asks why the subject lands at Ballybofey have been rezoned from 'Primarily Residential' in the previous LAP (2008-2014) to 'Amenity' in the Draft LAP. 2. The submission requests that the lands as shown on the attached map be changed back to the 'Primary Residential' zoning for the following reasons: <ul style="list-style-type: none"> • The lands are located in an established residential area of Ballybofey. Access to this site would be via lands to the Glenfin Road and benefits from existing services. • A recent digital survey of the lands has identified that the majority of the subject lands are above the 1,000 year flood level as provided for in the CFRAM Report for the River Finn at this location. A small portion of the subject lands are below the 100 year flood level; the submission states that the Dunleavy family are happy for this area to be zoned 'River Corridor/Amenity'. • Client has had discussions with the adjoining landowners to the North West and has agreed to co-operate on any future development of the subject lands. • Development of the subject lands as residential is consistent with the strategic objectives for housing in the Ballybofey LAP 2008-2014 and the 	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>The points made in support of the proposal, including the site zoning history, and its proximity to other established residential areas, are noted. In relation to the zoning history, a more rigorous assessment of housing proposals is now required than would have been so required for previous Local Area Plans for Ballybofey/Stranorlar. The LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar, whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town and having regard to other factors most notably in this case, (i.) the local environment and (ii.) flooding.</p> <p>In terms of criterion (i.), the subject lands are located between the River Finn and an existing amenity/recreational walkway that runs from the Glenfinn Road towards Drumboe Woods. The provision and maintenance of recreational facilities is recognised as an important element in the Strategic Vision of the Draft LAP wherein it is identified that the Twin Towns will, inter alia, "...have (an) enhanced reputation as a centre of recreation and hospitality within the county.....also as an attractive place to live and work...". It is considered that the noted walkway and associated environment makes a significant contribution to the achievement of this vision. Regarding the second criterion, the comments in relation to flooding are noted. On foot of the points made in the submission the Flood Consultants were asked for</p>

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		current CDP 2012-2018. [See BS12]		<p>specific comments in relation to this area. The consultants note that much of the site is located within Flood Zone A and B and thus would be inappropriate for residential development. The consultants also note in response to the submission on the adjacent site (and as referenced in the subject submission) that the entire frontage across which vehicular access would be taken is located in Flood Zone A.</p> <p>In conclusion, it is considered that the balance in this case lies in favour of not amending the Draft LAP having regard to the availability of other more suitable sites and to the amenity and (partial) flooding issues as discussed above.</p> <p>Recommendation: No change.</p>
BS16	Barry McCullagh McCullagh Architecture & Surveying Ltd on behalf of Andrea McLaughlin	<ol style="list-style-type: none"> The submission relates to lands in the townland of Navenny, Ballybofey. The subject lands were zoned 'Residential' in the previous CDP 2012-2018 and in the Draft CDP 2018-2024, however they have been rezoned to 'Local Environment' in the Draft LAP 2018-2024. The submission requests that the a portion of the subject lands be rezoned back to 'Residential' use given the location of the lands, the existence of mains services and public access etc.. The submission states that RPS Consulting Engineers are currently preparing a flood risk assessment for the lands which they will submit in due course. RPS have confirmed that about 40% of the site 	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>1 and 2: The points made in support of the proposal, including the site zoning history, and its proximity to services, are noted. In relation to the zoning history, a more rigorous assessment of housing proposals is now required than would have been so required for previous Local Area Plans for Ballybofey/Stranorlar. The LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar, whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town and having regard to other factors most notably in this case, (i.) flooding.</p>

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		<p>originally zoned for residential use is located within Flood Zone C and is therefore appropriate for residential development. The submission recognises that the remainder of the site is located within Flood Zone B and would therefore be more suitable to less vulnerable development such as leisure, warehousing, commercial or industrial uses.</p>		<p>The SFRA identifies that a significant portion of this site falls within an area identified as Flood Zone A. Following the sequential approach and justification test set out in 'The Planning System and Flood Risk Guidelines' Nov 2009, the site is not suitable for re-zoning to the uses requested. Moreover, given the identification of these lands within Flood Zone A, it is considered that the portion of this site that falls within Flood Zone A should be re-zoned from 'Local Environment' to 'Recreation and Amenity'. (nb. the Submission refers to an independent flood risk assessment being carried out for this site; this has not been submitted.)</p> <p>Recommendation: To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA10' contained at the end of this section of the report from 'Local Environment' to 'Recreation and Amenity'.</p> <p>This is a Material Alteration - Ref. BSMA10.</p>
BS17	Carr & Company Civil Engineers Submission No. 2 on behalf of Paul Murphy	<ol style="list-style-type: none"> The submission asks why the subject lands at Ballybofey have been rezoned from 'Primarily Residential' in the previous LAP (2008-2014) to 'Local Environment' in the Draft LAP. The submission requests that the lands as shown on the attached map be changed back to the 'Primary Residential' zoning for the following reasons: <ul style="list-style-type: none"> The lands are located in an established residential area of Ballybofey adjoining 	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>The points made in support of the proposal, including the site zoning history, and its proximity to services, are noted. In relation to the zoning history, a more rigorous assessment of housing proposals is now required than would have been so required for previous Local Area Plans for Ballybofey/Stranorlar. The LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar, whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it</p>

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		<p>lands zoned 'Primarily Residential' to the North West. Existing lands to the east and south are established residential development. Access to this site would be via the Glenfin Road and benefits from existing services.</p> <ul style="list-style-type: none"> • Development of the subject lands as residential is consistent with the strategic objectives for housing in the Ballybofey LAP 2008-2014 and the current CDP 2012-2018. [See BS15] 		<p>is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town and having regard to other factors most notably in this case, (i.) flooding.</p> <p>The SFRA identifies that a significant portion of this site falls within an area identified as Flood Zone A. Following the sequential approach and justification test set out in 'The Planning System and Flood Risk Guidelines' Nov 2009, the site is not suitable for re-zoning to the uses requested. Moreover, given the identification of these lands within Flood Zone A, it is considered that the portion of this site that falls within Flood Zone A should be re-zoned from 'Local Environment' to 'Recreation and Amenity'. (nb. the Submission refers to an independent flood risk assessment being carried out for this site; this has not been submitted.)</p> <p>Recommendation: To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA11' contained at the end of this section of the report from 'Local Environment' to 'Recreation and Amenity'.</p> <p>This is a Material Alteration Ref. BSMA11.</p>
BS18	Ian Davis	Requests rezoning of lands adjacent to area zoned as 'Established Development' and located at Cappry, Ballybofey from 'Local Environment' to 'Opportunity Site' or 'Primarily Residential' The 'Local Environment' zoning is too restrictive (Policy GEN-H-1) particularly	Yes. See separate folded map for Ballybofey/Stranorlar	Noted. However the LAP must be consistent with the Co. Donegal Development Plan and the Core Strategy provision therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar whilst also facilitating

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		<p>given the increasing demand for housing. The subject lands are considered suitable for housing in accordance with the criteria in a Tier 2 town for the following reasons:</p> <ul style="list-style-type: none"> not contained within a flood risk catchment; approx. 2km from Ballybofey; compatible with adjoining uses; accessed via a public road readily serviceable; offer opportunity to consolidate existing residential development. A multiple development was previously approved at this location(Planning Ref. 07/60115) but expired in 2012. 	(Map 3)	<p>appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in terms of the sequential growth of the town.</p> <p>Recommendation: No change.</p>
BS19	Kitty Coll	<p>The submission relates to the route of the bypass (although not explicitly stated). It is stated that they were informed by Donegal County Council Consultants that there will be more flooding from the bridge up river and the roundabout will flood from Trennamullen Burn and the River. If there is extensive flooding the treatment plant will be in danger. The submissions suggests consulting Jennings & O'Donovan Engineers, Sligo.</p> <p>The submission suggest an alternative route would be to use the line of the Old Road from Corcam to Kilross joining in with a route selected on higher ground away from the flood plain.</p>	No	<p>Comments noted. These are detailed matters that can only be investigated at the Detailed Preliminary Design and Environmental Assessment Stage. The following text was agreed as a minor amendment to be inserted into the County Development Plan, 2018-2024 and may be useful in providing further context to the issues raised in the submission.</p> <p><i>'Currently the Ten-T Priority Route Improvement Project Donegal is at Constraints Stage / Route Selection. The Route Selection will be completed by Q2/Q3 2018 and upon adoption of the preferred routes, a Material Alteration of the County Development Plan will be required. The new Ten-T Priority Route Improvement Project Donegal Route Corridors will supersede those 'historical project reserved corridors' currently within the County Development Plan as necessary, namely:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> N13-N15 Ballybofey Stranorlar Bypass <input type="checkbox"/> N56 Letterkenny Relief Road <input type="checkbox"/> N14 Letterkenny to Lifford". <p>Recommendation: No change</p>

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BS20	Aubrey Oliver	The submission relates to the preservation of Dunwiley Wood, which is currently in private ownership, as a greenbelt/Amenity area for the benefit of the Twin Towns. The submission requests that Dunwiley Wood be rezoned from 'Local Environment' in the Draft LAP to 'Amenity'.	Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)	<p>A large portion of lands within the subject site consist of mature deciduous natural woodland (known locally as Dunwiley Wood), it is considered that this portion of the site is of value from both an amenity and environmental sustainability perspective. The Land Use zoning objective of the Draft LAP 'Local Environment' for this site, would facilitate limited residential or small scale economic development.</p> <p>Having reviewed this site, it is considered that a 'Recreation and Amenity' zoning more appropriately reflects the amenity (and environmental) value of the portion of this site containing deciduous natural woodland.</p> <p>An amendment of the LAP to reflect this approach would be consistent with the provisions of the previous Ballybofey/Stranorlar LAP 2005-2011, the CDP 2012-2018 and the Draft CDP 2018-2022.</p> <p>Recommendation: To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA12' contained at the end of this section of the report from 'Local Environment' to 'Recreation and Amenity'.</p> <p>This is a Material Alteration Ref. BSMA12</p>
BS21	Rev. Adam Pullen	The submission claims there is a mistake on the Ballybofey-Stranorlar Map in relation to the zoning of the Church lands as identified on the attached map. The observer thinks that the Church lands have been incorrectly identified as Golf Course lands due to the 'Local Environment' and 'Amenity' zoning on part of the subject lands.	Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)	<p>The lands delineated in this submission were zoned based on the location, nature, survey and assessment of the site(s); the submission makes no suggestion/request for the re-zoning of these lands. Comments noted.</p> <p>Recommendation: No change.</p>

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BS22	Ian and Elaine Bailey	<p>1. The submission contends that it is disappointing to see that is no detailed guidance or specific policy set out in the LAP for the existing car park in front of the Ballybofey Shopping Centre, which is noted in the Draft Plan as having potential to provide a 'quality civic/public space for the town'. This central area is a fundamental element of Ballybofey town centre and it has the potential to significantly improve to the character, appearance and function of the town from an economic, social and physical perspective. This is a core part of the town centre, a central hub for the community and for businesses that needs a clear vision set out and protected at local planning policy level.</p> <p>The vision for the civic square for Ballybofey as set out in the Draft LAP, fails to provide a much needed indicative layout in the form of an urban design framework or concept plan. This does not need to be a detailed piece of work but something along the lines of what has been developed for other similar towns in the draft Plan. If the LAP does not make a specific policy provision for this, there is a risk that piece-meal development may gradually erode the existing urban square and therefore dilute what is left of this core area, preventing this vision from ever materialising. Having a clearly defined policy also provides</p>	No	<p>1 and 4. Comments noted. It is considered that the 'detailed guidance' would be more appropriately developed through the preparation of the Masterplan. Furthermore, any such masterplan will also be subject to a separate public consultation exercise.</p> <p>Recommendation: No change.</p>

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		<p>developers with certainty on how the Council view this site and how they wish to encourage its redevelopment.</p> <p>2. The square has the potential to provide a softer informal gathering space; an urban square, with appropriate public realm furniture and landscaping which in turn would require the car park being re-located. There are numerous options available to support this relocation of this car park, such as a shared car parking strategy for the town which could operate between the Council and Aldi and/or with the inclusion of the land owner to the rear of Ballybofey Shopping Centre. A joined up arrangement is clearly needed in order to provide a sustainable and successful solution, which in turn would have mutual benefits to all retailers and customers in carrying out multi trip shopping patterns.</p> <p>3. There is also considerable potential for the existing pedestrian link between Aldi and McElhinneys to be opened up to the public in a more formal manner (currently blocked with a chain). This would increase pedestrian movement. There is also potential for the creation of a covered and lit pedestrian link along this pathway which again would create a dedicated space within a thoroughfare and encourage greater movement of people and in turn</p>		<p>2. It is agreed that there may be options for the provision of alternative parking areas to replace displaced parking spaces. However, the identification of such areas and securing the buy-in of the relevant stakeholders requires detailed investigations and negotiations.</p> <p>Recommendation: No change.</p> <p>3. It is agreed that the existing pedestrian walkways should form an integral part of any proposed development within this town centre OPP site 1, and text to this effect is proposed as per the recommendation below.</p> <p>Recommendation: No change.</p>

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		<p>benefit local businesses and the vitality of the town. A covered link could also offer a location for the display platform for local community groups, artists to display their work, fund raising for local sporting groups and to create awareness for various local activities (and businesses). This is a small example of what the new civic space could achieve, however, without an indicative plan or a clearly defined policy for such a key location, the potential that this space has may be lost.</p> <p>4. The submission recommends that the introductory text on Page 40 of the draft LAP be developed further so that it refers to clearly defined planning policy and/or includes an 'Indicative Concept Plan' for this potential civic space in accordance with Government Guidance (i.e. Department's Guidelines for Planning Authorities for Local Area Plans (June 2013), Section 5.7 (Achieving Quality in Urban Design)).</p>		<p>4. Comments noted and agreed. It is considered that the potential of the existing shopping centre car-park could be given stronger expression in the Plan in line with the language contained in the submission. This is addressed in the recommendation below.</p> <p>Recommendation:</p> <p>1. Amend para. 5.4.2 in relation to 'Opportunity Site 1 as follows (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>Opportunity Site 1: Ballybofey Town Centre</p> <p>The lands comprising Opp Site 1 are located in the town centre core of Ballybofey, adjacent to the National Primary Road/Main Street and are a prime, high profile opportunity for a major development in the heart of the town centre. The lands are controlled by only a very small number of owners. Notwithstanding these advantages, a number of</p>

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				<p>constraints will have to be addressed and a masterplan approach should be adopted to ensure that the maximum benefit is derived for the town.</p> <p>Most of the lands fall within Flood Zone B as per 'The Planning System and Flood Risk Management Guidelines', November, 2009 as identified in the CFRAMS. There is also an issue with the capacity of the storm sewer network. Accordingly, a comprehensive flood risk assessment shall be required for any development proposals in this area. The identification of the site within Flood Zone B, and the prime town centre location, determines that only retail and commercial uses shall be considered having regard to the contents of Para. 3.5 of the aforementioned Flood Risk Guidelines. Other uses above ground floor level shall be considered on their own merit.</p> <p>The junction of Main Street/Chestnut Road already experiences difficulties in terms of movements on to and off the National Road. Any major development in this area will only add to these issues. Accordingly, any such proposals must be accompanied by a traffic impact assessment and road safety audit. Revised junction arrangements may be required.</p> <p>The Planning Authority considers the existing parking area to the front of the Ballybofey Shopping Centre as a major opportunity to deliver a quality area of civic/public space for the town. This central area is a fundamental element of Ballybofey town centre and acts as a central hub for the community and for businesses alike. This area has the potential to significantly improve the character, appearance and function of the town from an economic, social and</p>

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				<p>physical perspective Any comprehensive development proposals for the Opp 1 area should provide for such a facility at this location whilst also providing for the replacement of the displaced parking spaces at an alternative location in close proximity to the existing parking area. To clarify, the civic space idea cannot proceed unless and until the parking to be displaced has already been replaced at an adjacent site.</p> <p>Having regard to the proposed relocation of Finn Harps Football Club to the Masterplan Area, Stranorlar, and the central location of the site of the current Finn Park stadium, this site is included within the Opp 1 site. Policy BS-TC-1 refers.</p> <p>2. Amend Policy BS-TC-1 in relation to 'Opportunity Site 1 as follows (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>Policy BS-TC-1: It is a policy of the Council to consider proposals for retail, commercial or tourism development on Opportunity Site 1; or for development providing for a combination of some, or all, of the aforementioned uses, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals shall only be considered in the context of a comprehensive masterplan, a comprehensive flood risk assessment (and appropriate mitigation measures as appropriate), and a comprehensive traffic impact assessment (and appropriate mitigation measures as appropriate). In exceptional circumstances, proposals for minor development may be considered in the</p>

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				<p>absence of a Masterplan where the Planning Authority is satisfied that the overall masterplan approach will not be prejudiced. The design principles set out below shall form the basis of the terms of reference for a masterplan to guide and inform development of the site:</p> <ul style="list-style-type: none"> a) Design shall be of high quality, innovative and modern in architectural form so as to provide for landmark buildings and to contribute positively to the urban form. In particular, the existing car parking area to the front of the Ballybofey Shopping Centre may be the location for the development of a quality, designed civic space, subject to advance replacement of parking spaces that will be displaced at suitably convenient location(s). b) Proposals shall provide for a strong riverside frontage along the eastern side of the site. c) Proposals shall incorporate sufficient car parking to serve the proposed development. In this regard, internalised multi- storey car parking will be encouraged in order to make most efficient use of this brownfield site. d) With specific reference to the current Finn Park part of the site, a layout that provides for sufficient set back of frontage at Navenny Street so as to make sufficient provision for a public footpath and associated public lighting and drainage. <p>This is a Material Alteration - Ref-BSMA13.</p>
BS23	Michael Friel Architects on behalf of Barry Cannon	1. Submission refers to planning application ref. 17/51700 and outline permission ref. 11/60224. It is alleged that the landowner was never informed that the Council proposed to reserve land for a potential	Yes. See separate folded map for Ballybofey/	1. Noted. The Draft LAP public consultation process was conducted in accordance with all such requirement accordance with the Planning and Development Acts 2000 (As Amended) for a period from the 24th November 2017 until the 24th January 2018 inclusive. Notwithstanding the

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		<p>access onto the Donegal Road and as a result his planning application ref. 17/51700 has been paused to await the outcome of the Draft Plan.</p> <p>2. It is contended that there is more than adequate space to accommodate an access onto the Donegal Road in the residual land to the east of proposed site 17/51700.</p> <p>3. Council are requested to take this submission into account and allow the landowner progress his planning application.</p>	Stranorlar (Map 3)	<p>concerns expressed in the submission, it is not a requirement of the Planning Authority to notify individuals of Draft zoning proposals.</p> <p>Recommendation: No change.</p> <p>2- 3. The concerns expressed in the submission are noted. Other factors to be addressed in the consideration of this issue are the extent of the subject lands and the considerable development potential arising enable the sustainable concentric growth of the town; their location between two of the major road arteries serving the town (Glenfin Road and Donegal Road); plus the limited opportunities left to unlock these lands for development in terms of suitable access. In addition, the strategic benefits of the development of a strong link connecting these two roads, and the consequential benefits in terms of town centre congestion alleviation must also be given due consideration. For these reasons, the principle of the reserved access route is considered to be sound and it follows that the provision should be retained.</p> <p>With regard to the impact on the referenced planning application, an examination of the submitted layout has determined that there would be insufficient width left between the proposed house and the nearest property to the east to ensure that a junction and road of the required dimensions would be achievable.</p> <p>Recommendation: No change</p>
BS24	Seamus Mc Menamin	1. The Stranorlar MD has suffered from population decline in recent years. Unemployment, access to education and emigration are also big issues in the area.	No	Points 1-4 and the background information contained therein are noted. The strategic position of Ballybofey-Stranorlar and the critical mass of the towns is recognised in the Draft County Development Plan as well as Section 5.5.1 of the Draft LAP, and

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		<p>2. Many businesses in the area started out in a dwelling house or shed and have ended up expanding in remote rural areas. The buildings serving these businesses have become valuable to the individual business only and are difficult to re-sell.</p> <p>3. From a central planning perspective, the focus must be on the provision of suitable zoned lands in locations accessible by existing infrastructure and population mass.</p> <p>4. Within the Ballybofey Stranorlar area and indeed the Finn Valley there are little dedicated zoned lands that can be made available at an affordable price where expanding business can look to for expansion. Over the years, many businesses have had to relocate out of the Finn Valley as a result.</p> <p>5. The lands subject of the submission will be trisected by the N15, N13 and the proposed Ballybofey-Stranorlar bypass. The subject lands at Trennamullen and Corcam are located perfectly for the purpose of strategic development as they are close to the towns but far enough away so as not to disturb residential areas.</p> <p>6. The lands will have direct access to the proposed A5 and onwards to Dublin and access to the N13.</p> <p>7. The lands will be high profile by virtue of frontage onto the National Primary road.</p>		<p>the consequent economic development potential of the area is equally recognised.</p> <p>Points 5-9 profile the strategic locational advantages of the Strategic Economic Development Opportunity Site as zoned in the Draft LAP. Again, these points are noted and generally agreed. Notwithstanding, the advice of the (former) National Roads Design Office, DCC remains, as previously, that the Ballybofey/Stranorlar to Lifford Road Re-alignment Scheme remains on the work programme at present and that it would be premature to retain the proposed zoning of the subject lands in the finalised Plan as it would prejudice the planning and delivery of the road realignment scheme. it is for these reasons that the recommendation below is made.</p> <p>In relation to this site/issue, the Draft LAP noted that the</p>

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		<p>8. The lands are ideally located to attract emerging organic business, distribution centres or large office development.</p> <p>9. The submission supports DCC in seeking to attain an 'exemption' for access onto the NR road.</p> <p>10. The proper development of the subject lands would give rise to employment opportunities in the towns.</p> <p>11. The submission urges the retention of the proposed SEDOS(1) zoning of the lands at Corcam for the reasons set out above.</p>		<p>realisation of the potential of these lands depends on the Council securing consent from Transport Infrastructure Ireland (TII) for a strategic access onto the N15 (where the maximum speed limit applies) under the exemption set out in Section 2.6 of the Ministerial Planning Guidelines 'Spatial Planning and National Roads'. It was noted in the Draft LAP a case would be prepared and submitted to Transport Infrastructure Ireland in support of an exemption to the general presumption in accordance with protocols set out in the aforementioned Guidelines. This document is being finalised and will be submitted imminently to the TII.</p> <p>Recommendation</p> <p>1. Amend the Draft LAP by deleting text as identified at the following locations (deleted text shown in strikethrough, new text in blue):</p> <p>a) <u>Section 5.5.1 (second para.)</u></p> <p>For these reasons, and given also the critical mass of the Twin Towns, the LAP identifies a number of sites for economic development purposes. Sites have been identified to the east (Strategic Economic Development Opportunity Sites 1 and Opportunity Site 6), south (Economic Development Site 1) and west (Economic Development Sites 2 and 3) of the towns at locations that would provide for convenient access to the National Primary Road network and also to provide a degree of profile/visibility. The LAP also includes an Objective to identify additional land for economic development on the western fringes of Ballybofey. This proposal is for the long-term and development in this area will only be realised as and when the Ballybofey-Stranorlar Bypass is completed and the current National Primary Road</p>

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				<p>is 'down-graded' in category.</p> <p>b) <u>Section 5.5.1 (third and fourth paras.)</u></p> <p>The above-noted Strategic Economic Development Opportunity Site (identified on the Land Use Zoning Map as SEDOS 1) is located at Mullindrait to the east of Stranorlar. These lands were zoned for 'Economic Development' in the Ballybofey/Stranorlar Local Area Plan, 2005-2011 and the Council has again identified these lands as representing a Strategic Economic Development Opportunity Site in the context of the above-noted Policy ED-P-15 of the Draft County Development Plan. The lands are bisected by the proposed Ballybofey/Stranorlar Bypass Route Corridor Reservation and the lands to the east of the aforementioned route are also located immediately adjacent to the proposed N15 Lifford to Ballybofey/Stranorlar Route Corridor Reservation.</p> <p>The aforementioned location adjacent to a section of the N15 National Primary Road with a speed limit greater than 60kph presents a key challenge to delivering development on these lands. In these circumstances, access is subject to National Roads Policy restricting new accesses, or the intensification of existing accesses, onto national roads where such a speed limit applies. Consequently, the realisation of the potential of these lands depends on the Council securing consent from Transport Infrastructure Ireland (TII) for a strategic access onto the N15 under the exemption set out in Section 2.6 of the Ministerial Planning Guidelines 'Spatial Planning and National Roads'. The identification of this strategic opportunity and associated access/junction proposal in this Draft LAP is a significant step</p>

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				<p>in doing so. The Council will enter into negotiations with TH in this regard.</p> <p>c) <u>Objective BS-ED-1</u> It is an objective of the Council to develop lands zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1) for strategic economic development inclusive of identifying an agreed access solution to said lands onto the N15 in consultation with Transport Infrastructure Ireland.</p> <p>d) <u>Policy BS-ED-2</u> It is a policy of the Council to facilitate economic development proposals of a strategic economic development nature inclusive of proposals related to Class 3 (office); Class 4 (light industrial); Class 5 (wholesale warehouse or repository); manufacturing, information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall dovetail with, and incorporate as necessary, the Ballybofey/Stranorlar Bypass route; and (2.) the proposed N15 Lifford to Ballybofey/Stranorlar Route Corridor Reservation. The Masterplan shall make adequate provision to ensure the protection of residential amenities of existing residential properties situated adjacent to the National Primary Road by means of the identification of adequate buffer zone(s).</p> <p>2. To amend the zoning of the site identified on the map entitled 'Proposed Material Alteration BSMA14' contained at</p>

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				<p>the end of this section of the report from 'Strategic Economic Development Opportunity Site (SEDOS 1) from 'SEDOS 1' to 'Local Environment'.</p> <p>This is a Material Alteration - Ref. BSMA14.</p>
BS25	<p>Ballybofey and Stranolar Chamber of Commerce</p> <p>Leah Fairman</p>	<ol style="list-style-type: none"> 1. LAP must make adequate provision for non-retail industrial development in the towns. Over the past years a number of businesses have had to relocate due to absence of suitable lands. 2. Lands surrounding existing sporting amenities must be protected to allow for expansion/future development of facilities etc. Golf Club is an important tourism resource as well as being important for locals. 3. It is important that sites are designated for educational, health and primary care facilities. 	No	<ol style="list-style-type: none"> 1. Noted. The need for the provision of such lands was recognised during the preparation of the Draft LAP in the context of a balanced approach to the development of the Towns consistent with the overarching 'Strategic Vision' of the Towns 'having an enhanced reputation as a sporting centre of excellence and as a key centre of recreation and hospitality for the County...' . This recognition led to the identification of a range of sites for such uses including those zoned as 'Economic Development' and as 'Opportunity Sites'. <p>Recommendation: No change.</p> <ol style="list-style-type: none"> 2. Refer to response to BS31 below. 3. Noted. The public consultation exercise, including consultation with prescribed bodies, has not elicited any major proposals for such facilities. Notwithstanding, the 'Community' zoning located opposite the Finn Valley Centre provides for educational use reflecting the planning permission for a school at this site.

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		<p>4. Housing developments must make provision for recreation and community space.</p>		<p>Recommendation: No change</p> <p>4. The provision of adequate recreation and community space is a central component of policy on new residential developments. Policy UB-P-13 of the Draft County Development Plan, 2018-2024 is particularly relevant in this regard and will be applied appropriately for such developments in the Twin Towns area (the Policy is contained in Appendix A of the Draft LAP and is inserted below for ease of reference)</p> <p>Draft LAP Policy UB-P-13: Multiple residential developments shall, in general:</p> <ul style="list-style-type: none"> a) On greenfield sites, include a minimum of 15% of the overall site area reserved as public amenity area; b) In other cases, such as large infill sites or brown field sites include a minimum of 10% of the overall site area reserved as public amenity area or c) On lands characterised by a large private or institutional building/s set in substantial open lands, include a minimum of 20% of the overall site area reserved as public amenity area; in accordance with and subject to the guidance set out in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009) and the requirements set out below. <p>The provision of public amenity open space within new residential developments shall:</p> <ul style="list-style-type: none"> (i) 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

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		<p>5. A town park is needed - the Monument Field adjacent to Drumboe Woods would provide an excellent site for such a park.</p> <p>6. The LAP must make provision for dedicated cycle paths.</p> <p>7. It should be a deliberate policy that development is configured to have a river frontage. The river has the potential to be a key focus in the twin towns.</p>		<p>(ii) Be of a high quality design, providing for multi-functional uses, through the use of hard and soft landscaping techniques including equipped formal play areas, informal greens, furniture, paved and planted amenity areas, and</p> <p>(iii) Provide adequate lighting and signage, and highly accessible linkages with the surrounding public footpath network and other designated amenity areas, and</p> <p>(iv) Include a programme of maintenance.</p> <p>Recommendation: No change.</p> <p>5. Noted. Section 5.8.1 and Policy BS-TR-4 address this issue and contain a policy framework that would allow for such a project.</p> <p>Recommendation: No change.</p> <p>6. Noted. The Draft LAP includes such provisions.</p> <p>Recommendation: No change.</p> <p>7. Noted. The proposal is considered reasonable and reflects a provision already contained in Policy BS-TC-1 (town centre Opportunity Site 1). The recommendation below contains a proposed policy to address this issue.</p> <p>Recommendation:</p> <p>1. Insert new para. at end of Section 5.9.1 (new text shown in blue) As already noted elsewhere in this Section of the LAP, the River Finn running through the Twin Towns is an important</p>

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		<p>8. The Bus Éireann depot has potential for alternative uses. The Council should begin negotiations with CIE for relocation of depot.</p> <p>9. The current development plan makes provision for a number of proposed link roads within the towns - these should be retained.</p> <p>10. Old railways within the environs of the towns should be protected for the purpose of developing walkways.</p>		<p>asset and feature for the towns. The River creates enormous opportunities for the achievement of quality urban design that provides sympathetic integration with the River, as opposed to development that 'turns its back' on the resource.</p> <p>2. Insert new Policy at end of Section 5.9.1 (new text shown in blue)</p> <p>Policy BS-EH-1 It is a policy of the Council to ensure quality design solutions for developments located adjacent to the River Finn, where such sites are centrally-located in the towns and visible to the public. In general terms, such developments will be required to demonstrate sympathetic integration with the River and, in this regard, proposals that 'turn their back' on the River will not generally be supported.</p> <p>This is a Material Alteration - Ref. BSMA15.</p> <p>8. Noted.</p> <p>Recommendation: No change.</p> <p>9. Noted.</p> <p>Recommendation: No change.</p> <p>10. Noted. The existing railway lines within the plan area have been zoned for 'Walkway/cycleways' in the Draft LAP.</p> <p>Recommendation: No change.</p>

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		<p>11. Derelict buildings are an issue - the Council need to monitor situation and incentives should be put in place to encourage renovation / reuse.</p>		<p>11. Noted This issue is recognised in the Draft LAP including at Section 5.2: Key Planning Issues, (second bullet) wherein the following is recognised: 'The need for a cohesive strategy to maximise the capacity of the existing town centres, to identify key renewal and regeneration opportunities and additional, appropriate opportunities outside of the town centres.'</p> <p>It is considered that the Draft LAP provides a balanced policy framework within which such an initiative could be progressed subject to normal resourcing and third party ownership issues.</p> <p>Recommendation: No change.</p>
BS26	Harley Planning Consultants	<p>1. Submission requests the rezoning of certain lands at Navenny from Established Development (and a narrow strip of 'amenity') to Residential (maps included within text of submission). It is contended that the subject lands are close to the town centre, well served in infrastructural terms and contain a substantial number of unfinished houses granted under an earlier planning permission. Taken in conjunction with the acknowledged shortfall of 468 housing units and the failure of zoned lands to deliver housing during the last 5 years, it is suggested that the subject lands at Navenny should be rezoned for residential use.</p> <p>2. Planning permission previously granted for</p>	<p>Yes</p> <p>See separate folded map for Ballybofey/ Stranorlar (Map 3)</p>	<p>1-3. Re-zoning request and background information in relation to the location and infrastructural servicing of the site are noted, as is the planning history thereon.</p> <p>Recommendation: No change.</p>

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		<p>34 dwellings - ref. 05/60048; of which 24 were sited within the subject lands.</p> <p>3. A planning application for demolition of partly constructed dwellings on site and erection of 9 no. dwellings was refused on appeal to ABP.</p> <p>4. Submission provides details relating to Core Strategy of CDP as it applies to Ballybofey/Stranorlar.</p> <p>5. Submission contends that there are no valid planning applications for housing on any of the lands zoned for residential purposes in Ballybofey-Stranorlar.</p> <p>6. Doubts are cast on the efficacy of the Councils monitoring approach for housing development, contending that previous monitoring (or lack thereof) has failed to adequately provide for new housing requirements.</p> <p>7. It is contended that there is ambiguity and conflict between policies GEN-H-1 and GEN-H-2 that needs to be clarified - i.e. where exactly will multiple housing be permitted?</p> <p>8. It is contended that housing policies of the CDP should be enshrined in the LAP rather than included as an Appendix - e.g. policy UB-P-17.</p>		<p>4-6. Noted. It is considered that the process for the identification of sites for residential development for inclusion in the Draft LAP was robust. This process led to the identification of a range of different types of sites around the Twin Towns with the express purpose of providing prospective developers with a greater range and choice of sites to invest in.</p> <p>Recommendation: No change.</p> <p>7. Noted, but not agreed. It is considered that policies GEN-H-1 and GEN-H-2 are consistent and do not create ambiguity.</p> <p>Recommendation: No change.</p> <p>8. Comment noted. In general, it is considered that the structure of the document as contained in the Draft LAP is sensible and user-friendly in providing key CDP policies in a convenient manner. Specifically in relation to the policy for the resolution of unfinished estates given the importance of this policy, it is considered appropriate to restate it within the general housing policies of the LAP as outlined in the</p>

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				<p>recommendation below. This is considered to be a measure of clarification and therefore is not a material change.</p> <p>Recommendation: To amend the Draft LAP so as to insert an additional general housing policy at chapter 3, section 3.5.3, page 18 as follows (new text in blue):</p> <p>GEN-H-11: It is the policy of the Council to consider proposal for urban residential development that seek to resolve existing unfinished residential developments, including through appropriate reconfiguration of developments, and such proposals shall be considered outside the population targets set by the core strategy.</p> <p>This is a Non-Material Alteration - Ref. GENNMA14.</p> <p>It should be noted that a large part of this site falls within Flood Zone B as identified in the SFRA. Notwithstanding that the Planning System and Flood Risk Management Guidelines urges caution in dealing with proposed residential development in these areas, having regard to the development history on the site already and also to the relatively central location of the site, and having regard also to the policy support for the rehabilitation of unfinished estates as outline above, it is considered that the balance approach to this site is to retain the site's zoning as 'Established Development' subject to a requirement for a site specific flood risk assessment.</p> <p>Recommendation: 1. Insert new Policy BS-H-2 (new text shown in blue)</p> <p>Policy BS-H-2:</p>

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				<p>It is a policy of the Council that any applications for redevelopment of the unfinished estate located generally opposite the estate known as 'The Beeches', Navenny, Ballybofey shall be accompanied by a site specific flood risk assessment.</p> <p>2. Add new notation to Ballybofey-Stranorlar Land Use Zoning Map in the vicinity of the subject site to read as follows: (new text shown in blue)</p> <p>All applications for redevelopment of this area shall be accompanied by a site specific flood risk assessment.</p> <p>This is Material Alteration - Ref. BSMA16.</p>
BS27	Harley Planning Consultants	<ol style="list-style-type: none"> 1. Submission requests the rezoning of certain lands at Cappry from Established Development (and partly local environment) to Residential (maps included within text of submission). 2. The subject lands are an extension of the existing Aishling Court development (subject of planning ref. 02/8429, 04/9312 and 06/60609). 3. Submission provides details relating to Core Strategy of CDP as it applies to Ballybofey/Stranorlar. 4. Submission contends that there are no valid planning applications for housing on any of the lands zoned for residential purposes in Ballybofey-Stranorlar. 5. Doubts are cast on the efficacy of the 	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>1-3. Re-zoning request and background information in relation to the location and infrastructural servicing of the site are noted, as is the planning history thereon.</p> <p>Recommendation: No change.</p> <p>4-6. Noted. It is considered that the process for the identification of sites for residential development for inclusion in the Draft LAP was robust. This process led to the identification of a range of different types of sites around the Twin Towns with the express purpose of</p>

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		<p>Councils monitoring approach for housing development, contending that previous monitoring (or lack thereof) has failed to adequately provide for new housing requirements.</p> <p>6. It is contended that there is ambiguity and conflict between policies GEN-H-1 and GEN-H-2 that needs to be clarified - i.e. where exactly will multiple housing be permitted?</p> <p>7. It is contended that the subject lands are located relatively close to the town centre and consist of the final unfinished portion of the Aisling Court residential scheme granted under planning ref. 06/60609 (and thus should be given benefit of policy UB-P-19 of the Draft CDP).</p> <p>8. It is suggested that the land-use zoning map accompanying the draft LAP should include an 'unfinished housing scheme' designation and that the lands at Cappry should be included in this designation.</p> <p>9. Taken in conjunction with the acknowledged shortfall of 468 housing units and the failure of zoned lands to deliver housing during the last 5 years, it is suggested that the subject lands at Cappry should be rezoned for residential use.</p>		<p>providing prospective developers with a greater range and choice of sites to invest in.</p> <p>Recommendation: No change.</p> <p>7. Noted, but not agreed. It is considered that policies GEN-H-1 and GEN-H-2 are consistent and do not create ambiguity.</p> <p>Recommendation: No change.</p> <p>8. Refer to response to Submission ref BS26 above. (point 8)</p> <p>The rezoning request in the submission is noted, however the LAP must be consistent with the County Development Plan and the Core Strategy provisions therein. The Core Strategy of the Draft County Development Plan 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the county, including Ballybofey/Stranorlar whilst also facilitating appropriately scaled expansion(s) where such strategic growth decisions are warranted. In this context, it is considered that the housing opportunities identified in the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan and b) are more appropriately located in</p>

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				terms of the sequential growth of the town. Recommendation: No change.
BS28	Steven and Jackie Vance	Submission expresses support for rezoning of Castlebane as 'green'.	No	Refer to response to Submission BS4 above.
BS29	Michael J Cannon	Submission disagrees with proposed road access to Opp Site 4. Requests that consideration be given to an alternative access (identified on accompanying map).	Yes. See separate folded map for Ballybofey/Stranorlar (Map 3)	Refer to response to Submission BS23 above.
BS30	Kevin Mc Menamin	<ol style="list-style-type: none"> 1. Concerns raised re. proposed walkways in Drumboe Lower, Stranorlar. Existing walkways have led to anti-social behaviour and adverse impacts on livestock, damage to fences etc. 2. The proposed walkways would render useless the entire section of the landowners farm adjacent to the River Finn and would intrude on other lands in the north-western section marked as 'passive open space'. 3. DCC has shown total lack of respect over the years in terms of failure to maintain fences and not listening to concerns regarding 'designing out' the few areas where antisocial behaviour occurs. 4. Submission requests that proposals for walkways be shelved until all concerns are 	No	<p>1-4. Concerns noted. It should be stressed that the identification of the walks referred to in the submission are aspirational only and do not infer, or confer, any right of access for members of the public. The referenced routes have been longstanding proposals of the Council and were identified in the previous Ballybofey/Stranorlar LAP 2005-2011.</p> <p>Recommendation: No Change</p>

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		ironed out.		
BS31	Carr & Company Civil Engineers on behalf of Mr. P. J. Mc Gowan, Honorary Secretary, Ballybofey & Stranorlar Golf Club	<ol style="list-style-type: none"> The 18 holes and club house of the golf club are presently accommodated on 69 acres of land; the norm for such facilities would be over 100 acres. The perimeter of the golf course in the LAP is highlighted with 'Golf Course Buffer Zoning', however it is unclear what size or extent this buffer would be in the case of future development. The proposed zoning for lands to the south of the golf course is Opportunity Site and Strategic Economic Development Opportunity site - submission requests that consideration be given to providing an explicit 25m buffer to the golf club boundary, to help protect the integrity of the club from future development along the boundary (see drawing LAP-101-B, accompanying the submission). 	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	<p>1-3 comments noted. A 'Golf Course Buffer' is identified on the Draft Land Use Zoning map. The buffer is indicative only and any proposal for developments within or without the Golf Course Lands are matters to be assessed at detailed planning application stage.</p> <p>Recommendation: No Change</p>
BS32	Barry Cannon	The submission objects to the proposed access road to Opp Site 4 through the subject lands as identified on the enclosed map.	<p>Yes.</p> <p>See separate folded map for Ballybofey/Stranorlar (Map 3)</p>	Refer to response to BS23 above.
BS33	Cepta Colhoun c/o Paula Mc Cormick	The submission objects to the proposed access road to Opp Site 4 through the subject lands as identified on the enclosed map.	<p>Yes.</p> <p>See separate folded map for</p>	Refer to response to Submission BS23 above.

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		[submission similar to BS32 above]	Ballybofey/ Stranorlar (Map 3)	
PRESCRIBED BODIES				
PB4	Transport Infrastructure Ireland (TII)	<p>1. Opportunity Site 2/Policy BS-TC-2 Note that proposals include for vehicular access to be provided from Opportunity Site 2 to the bypass link road only and for the section of bypass link road concerned to be constructed by a developer in consultation with, and to the standards of, TII. The access to the bypass link road will facilitate Retail Warehousing, among other uses, and is also referenced in Section 5.7 Strategic Roads of the Draft Local Area Plan.</p> <p>Concerned that no consultation in relation to such proposals has been undertaken by the Council with TII and as currently presented TII does not support the approach or proposals included in the Draft Plan. Such an objective is considered premature as the Ballybofey-Stranorlar Bypass Scheme is only at route selection stage, as acknowledged elsewhere in the Draft Local Area Plan. TII recommends a review of the proposed Objective. In addition, the Council will be aware that TII is not in a position to engage with developers of their agents but will liaise</p>	No	<p>1. 2. The concerns of TII regarding prior consultations are acknowledged. This was assumed not to be necessary due to the fact that this link road would not be given national Road status and thus it was considered that consultation by means of the publication of the Draft LAP (inclusive of a copy being forwarded directly to TII) would be sufficient. However, notwithstanding the TII's concerns, it is considered that opening up the subject lands by means of a single access off the link road would constitute proper planning and sustainable development that would achieve a major, strategic benefit for the towns given the significant extent of lands that would be 'opened up' and given also their position in close proximity to the edge of the defined town centre.</p> <p>Finally, a second reason for including the subject junction arises from the fact that, as noted in the Draft LAP, it is considered that the section of the link road between Donegal Road and Trusk Road is 'essential for the town regardless of whether or not the bypass road and link road as currently proposed goes ahead' (last paragraph, Page 51 refers).</p> <p>For this reason it is considered important to include the subject junction as it will be required whether or not the bypass and link road is constructed.</p> <p>Recommendation: No Change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>directly with the Council on land use planning and national road related matters.</p> <p>2. Strategic Economic Development Site (SEDOS) 1: Acknowledges identification of the site. The associated text confirms that the Council are of the view that access proposals to the lands concerned are required to conform to the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines. In that regard, TII confirms availability to discuss proposals with DCC and will review the appropriate evidence base prepared by the Council, when available. Cognisance should be had to the Ballybofey-Stranorlar Bypass Scheme. Any agreed access strategy should be incorporated into the Local Area Plan. TII considers it premature to facilitate planning applications on the subject lands pending the outcome of such an approach. Further comments in relation to any proposed Masterplan exercise are outlined below.</p> <p>3. Economic Development Site 2: Similar to observations made on An Clochán Liath (Dungloe) in relation to lands adjoining the national road network outside areas subject to a reduced 50 – 60kph urban speed limit, there is, in TII's opinion, a requirement to review Economic Development Site 2, which adjoins the N15</p>		<p>2. Noted. Refer to response to BS24 above.</p> <p>3. Comment noted. However it is envisaged that access will be achieved off the Meenglass Road to the east of the site, and the TII onto the National Primary Road.</p> <p>Recommendation: No Change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>at a location where the Authority's records indicate a 100kph speed limit applies. TII recommends a review of the proposed zoning and/or access proposals to ensure compliance with the DoECLG Spatial Planning and National Roads Guidelines and the aforementioned provisions of the County Development Plan.</p> <p>4. Ballybofey-Stranorlar Bypass: Welcomes support for the Bypass project included in Objective BS-IS-1. The Council will be aware that the scheme is at route selection stage and no specific links or tie-ins to the existing road network are identified. Reference to any proposed link road in Objective BS-IS-1 is considered premature.</p>		<p>4. Noted. The reference to the link road is made in the context of the Draft Plan identifying the longstanding bypass route, which route included the link road as identified in the Draft LAP.</p> <p>Recommendation: No Change.</p>

TEXT ASSOCIATED WITH REF. BSMA4

Proposed Material Alteration Ref. BSMA4:

To make consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing by amending chapter 5, section 5.6.2 and table 5.1, page 48 so that it reads as set out below:

5.6.2 Methodology for the Identification of Housing Lands

In order to identify the 39 hectares of residential land required in Ballybofey/Stranorlar, an analysis of available lands within the defined plan boundary and their suitability for residential development was undertaken. The criteria used in the analysis included, inter alia, – distance of lands from the town centre; compatibility with adjoining land uses; flood risk; the presence of sites of conservation importance; serviceability in relation to wastewater and water; accessibility and visual vulnerability as examples. Arising from this assessment the most suitable lands for housing within Ballybofey/Stranorlar are made up of a combination of lands zoned ~~9 sites identified as~~ 'Primarily Residential.' and part of 1 other area of land which is identified as 'Opportunity Site 1' and which has the potential for mixed use development including an element of residential land uses. Table 5.1 shows that a total of ~~22~~ 24.14 hectares of land in Ballybofey/Stranorlar is provided through the identification of 'Primarily Residential' lands, with capacity to deliver circa ~~263~~ 286 residential units while a total of circa 5 units are targeted for delivery through Opportunity Site 1. As shown in chapter 2 of this LAP, the level of land supply in Ballybofey/Stranorlar for the purposes of residential development is broadly consistent with the Core Strategy of the Draft CDP.

Extract of Table 6.1 from Draft LAP 2018-2024: Total Lands Identified to Meet Residential Housing Need in Ballybofey/Stranorlar

Site Ref	Zoned as 'Primarily Residential' or 'Opportunity Site.'	Area of site (ha)	Potential number of housing units to be delivered
PR1	Primarily Residential	1.78	21
PR2	Primarily Residential	3.86	46
PR3	Primarily Residential	5.27	63
PR4	Primarily Residential	3.32	40
PR5	Primarily Residential	2.17	26
PR6	Primarily Residential	2.94 2.49	35 29
PR7	Primarily Residential	1.22	14
PR8	Primarily Residential	1.36	16
PR9	Primarily Residential	2.67	32
	Total 'Primarily Residential'	24.59 24.14	292 286
LDR1	Low Density Residential	3.02	22
LDR2	Low Density Residential	1.05	8
LDR3	Low Density Residential	0.59	5
	Total 'Low Density Residential'	4.66	35
OPP2	Opportunity Site	6.47	78
OPP4	Opportunity Site	6.52	78
	Total 'Opportunity Site'	12.99	156

5 BALLYSHANNON SUBMISSIONS

5.1 Overview

A total of 36 submissions were received in respect of Ballyshannon comprised of:

- 35 from members of the public; and
- 1 from prescribed bodies (Irish Water).

5.1.1 Public Submissions

Of the 35 submissions received, 17 (Ref. Nos. BY2, BY3, BY4, BY5, BY6, BY8, BY12, BY19, BY20, BY21, BY22, BY23, BY27, BY30, BY31, BY34 and BY35) refer to potential walking and cycling routes, including: the provision of a footpath on the bypass between the Donegal Road roundabout and Rossnowlagh Road Roundabout, completing a loop around Ballyshannon; potential greenway/walkway/cycleway routes along the existing railway tracks to the north of the town towards Creevy and Rossnowlagh, to the south of the town towards Bundoran, and to the east towards Belleek via the Knader. A number of submissions also refer to the provision of a coastal walk from the existing recreation ground on the Mall to the Abbey Bay and the Three Bridges Walk. The response to this broad issue is provided in Section 5.2.2 below.

The remaining submissions primarily relate to the protection and promotion of the cultural history and heritage of Ballyshannon, the regeneration of the town centre and the enhancement of the tourism and amenity offer of the town. In addition there are a number of site specific zoning requests throughout the Plan area. The responses to these individual submissions are provided in Table 5.1 below.

5.1.2 Prescribed Bodies

The IW submission is generally informative and confirms in relation to water services in Ballyshannon that the anticipated completion date of works for the town is 2020.

5.2 Other Issues Arising

5.2.1 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of Consulting Engineers to prepare a Stage 2 Strategic Flood Risk Assessment (SFRA) in respect of the seven towns covered by the Draft Local Area Plan. Following completion of this report, a number of issues were identified in relation to various sites within the Plan boundary. Where these issues refer to lands the subject of public submissions, they are responded to in respect of the individual submission in Table 5.1. Responses to other issues raised which do not relate to the public submissions are set out below:

Opportunity Site 1

The SFRA identified a small portion of lands in the south-east corner of Opportunity Site 1 as Flood Zone A. Given the relatively small area involved, it is considered that this matter can be dealt with by way of a requirement for a site specific flood risk assessment to accompany any planning application, as opposed to the alternatives of re-zoning the site, or seeking a development plan Justification Test.

Recommendation:

1. Amend para. 6.5.2 on **Opportunity Site 1: Business Park at Carrickboy** as below (text to be deleted shown in strikethrough, new text shown in blue)

This site comprises approximately 10.7 hectares of land having previously been the location of the IDA Business Park in Ballyshannon. The site contains a number of vacant commercial buildings, the Ballyshannon IT Centre which houses the 999 emergency call centre and an area of undeveloped lands to its most southerly point. Its development has the potential to open up lands for development through the delivery of strategic roads that would improve accessibility and movements south of the river. The site has an existing access point and service road via a local road to West Port which may require improvements in width, alignment and junction arrangement to accommodate significant development. These lands have the potential to provide for a cluster of economic development including enterprise, commercial development, research, innovation, business, health related or education. [A small part of the site in the south-eastern corner has been identified as Flood Zone A in the Stage 2 SFRA \(refer to flood mapping\).](#) Given the small extent of this area, it would be disproportionate to re-zone this area. Rather, a more measured approach in this case would be to require that any potential future development that will encroach towards this part of the site may be required to submit a site specific flood risk assessment with the planning application. Policy BY-ED-1-refers.

2. Amend Policy BY-ED-1 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BY-ED-1: "It is the policy of the Council to consider proposals for the development of enterprise, commercial development, research, innovation, digital technology, business, health related or education on Opportunity Site 1 (Business Park at Carrickboy), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any development proposals shall make appropriate provision of the delivery of indicative Strategic Roads. Residential and retail development shall not be permitted at this location. [Planning applications for development that will encroach towards the south-eastern part of the site \(refer to flood mapping\) may be required to submit a site specific flood risk assessment with the planning application.](#)"

This is a Material Alteration – Ref. BYMA1.

Opportunity Site 4

The SFRA identified a significant portion of Opportunity Site 4 as being within Flood Zone A. The flood zone is located in the northern portion of the site adjacent to the waters edge and running broadly parallel with the shoreline. On the basis that both 'Highly Vulnerable' and 'Less vulnerable' uses as defined in the Guidelines would be likely to fail Justification Tests at this site, it is considered that the most appropriate approach to this issue would be to amend the text and policy to provide that only Water-compatible Development would be acceptable on that portion of the site (nb. the definition of 'Water-compatible' contained in the Guidelines is copied in below for ease of reference).

Recommendation:

1. Amend para. 6.5.2 on **Opportunity Site 4: Former Mill and Distillery** as below (text to be deleted shown in strikethrough, new text shown in blue)

Located at the water's edge, this brownfield site was originally the location of a former mill and distillery and also housed the office of the Heitons Building Suppliers. The site is approximately 1 hectare and comprises a number of partially demolished buildings and a structure that is on the Record of Protected Structures. This is a prominent waterfront location that adjoins the Donegal Bay SPA and therefore its development involves environmental considerations. It also has a visual relationship with Opportunity Site 4-5 which comprises the pier on the other side of the river and its associated nearby lands identified as Opportunity Site 5. Given its waterfront location, its historical context and its proximity to the town centre, this site has the potential for a mix of development including tourism related and associated small scale commercial/ niche type activities together with potential for limited residential development. Its redevelopment will require a heritage-led approach. [The northern portion of the site is located in Flood Zone A \(refer to flood mapping\) and as such any development proposals for this portion of the site must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities \(DoEHLG/OPW, November 2009\) including marine, leisure, recreation and tourism related development.](#) Policy BY-ED-4 refers.

2. Amend Policy BY-ED-4 as below (text to be deleted shown in strikethrough, new text shown in [blue](#))

It is the policy of the Council to consider proposals for the development of tourism related and associated small scale commercial/ niche type activities together with potential for limited residential development at Opportunity Site 4 (Former Mill and Distillery), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Proposals incorporating an element of residential development shall provide for a maximum number of 18 units. Any proposals for commercial development comprising a retail element shall be subject to the sequential approach set out in the Draft CDP. In addition, any proposal shall be required to adequately demonstrate (i) the conservation of a protected structure located within the site (ii) massing and scale that is appropriate for this sensitive waterfront location and (iii) that the development will not result in significant environmental impacts on the Donegal Bay SPA and (iv) compliance with the Habitats Directive. [Development proposals for the northern half of the site \(refer to flood mapping\) must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities \(DoEHLG/OPW, November 2009\) including marine, leisure, recreation and tourism related development.](#)

This is a Material Alteration – Ref. BYMA2.

Opportunity Site 5

The SFRA identified a significant portion of Opportunity Site 5 as Flood Zone A. The flood zone is located in the southern and western portions of the site adjacent to the waters edge (refer to flood mapping). On the basis that both 'Highly Vulnerable' and 'Less vulnerable' uses as defined in the Guidelines would be likely to fail Justification Tests, it is considered that the most appropriate approach to this issue would be to amend the text and policy to provide that only Water-compatible Development would be acceptable (nb. the definition of 'Water-compatible' contained in the Guidelines is copied in below for ease of reference).

Recommendation:

1. Amend para. 6.5.2 on **Opportunity Site 5: The Mall Quay** as below (text to be deleted shown in strikethrough, new text shown in [blue](#))

Opportunity Site 5: The Mall Quay

This site comprises approximately 1 hectare of land and is the location of the pier, which is a Protected Structure together with a number of low level commercial storage buildings. The site is located at the mouth of the River Erne, adjoining the Donegal Bay SPA and facing the archaeologically important Inis Samer Island to the south-west. This site is a key historical location in the town as the pier is a

reminder of the importance of Ballyshannon as a thriving port and regional market centre, particularly during the late-eighteenth and the nineteenth centuries. This is a prime site, located at the western edge of the historic street known as The Mall where there is a concentration of historic buildings identified on the Record of Protected Structures and/or National Inventory of Architectural Heritage. The town centre, via The Mall is in ready walking distance of the site and to the immediate north of the site there has been significant investment in recreational infrastructure in the form of open space encircled by a walkway, a children's playground and an outdoor gym. The development of this site for marine, leisure, recreation and tourism related development would improve public access to this historically important site and would add to the network of Ballyshannon's heritage assets and recreational infrastructure that can be availed of by the public and visitors. The western portion of the site is located in Flood Zone A (refer to flood mapping) and as such any development proposals for this portion of the site must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development. Policy BY-ED-5 refers.

2. Amend Policy BY-ED-5 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BY-ED-5: "It is the policy of the Council to consider proposals for the development of marine, leisure, recreation and tourism related development on Opportunity Site 5 (The Mall Quay), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Any proposal for development shall be required to adequately demonstrate (i) the protection of archaeological records and monuments that may be impacted upon (ii) massing and scale that is appropriate for this sensitive waterfront location (iii) that the development will not result in significant environmental impacts on the Donegal Bay SPA (iv) compliance with the Habitats Directive and (v) adequate public pedestrian and cycle access. Development proposals for the western half of the site (refer to flood mapping) must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development."

This is a Material Alteration – Ref. BYMA3.

Opportunity Site 9

The SFRA identified a low lying portion of Opportunity Site 9 located towards the northern end of the site as Flood Zone B. This site is identified for 'town centre' uses in the relevant Policy BY-TC-6 but the supporting text at Section 6.4.3 as it refers to this site does reference support for the principle of residential development. Two considerations arise.

Firstly, 'Town Centre' uses are categorised as 'Less Vulnerable' in the Flood Guidelines and such uses in Flood Zone B are identified as being acceptable (ie. not requiring a Justification test). The principle of town centre uses therefore remains acceptable. Notwithstanding, it is considered prudent to identify the possible requirement for a site specific flood risk assessment, particularly for development encroaching towards the identified Flood Zone B area, given the proximity of housing to the north of the site/identified Flood Zone B area.

Secondly, the Flood Guidelines identify that residential development on Flood Zone B areas are not acceptable.

Finally, two further adjustments to the text and policy are required to take account of site PR1 being taken out of the residential land supply (also for flood related reasons as addressed elsewhere in this report), and the consequential removal of the associated strategic road proposal.

It is recommended that these matters are addressed as follows.

Recommendation:

1. Amend para. 6.4.3 on Opportunity Site 9: Bachelor's Walk as below (text to be deleted shown in strikethrough, new text shown in blue)

Opportunity Site 9: Bachelor's Walk

This site comprises approximately 2.5 hectares and is the only town centre Opportunity Site that has not been previously developed. It is located at the northern end of Main Street with road frontage along Bachelor's Walk and it provides an opportunity for sustainable town centre expansion. Its northern boundary adjoins existing residential development. ~~and lands to the immediate West are zoned 'Primarily Residential' (PR1).~~ This site has the potential for a mix of town centre uses to be planned from the southern portion lands closest to the town centre firstly with the sequential development of the remainder of the land. ~~In the event of residential development, the preferred location is to the most northerly section of the site. An indicative strategic road line traverses the site east-west and links through PR1 and this would provide for primary vehicular access to the site via Bishops Street.~~ The southernmost part of the site is located with the archaeological complex of Ballyshannon. ~~Part of the northern end of the site has been identified as Flood Zone B in the SFRA report. Residential development will not be permitted on this part of the site. Planning applications for other forms of development that will encroach towards the northern part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application.~~ Policy BY-TC-7 refers.

2. Amend Policy BY-TC-7 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BY-TC-7: It is the policy of the Council to consider proposals for the development of town centre uses on Opportunity Site 9 (Bachelor's Walk), subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any proposals for part only of the site shall ensure the delivery of the most southern portion of the site first closest to the town centre followed by the incremental development of the remainder of the site. ~~Proposals shall also be able to provide for the indicative strategic roads access that traverses the site and ensure that there will be no negative impact on material associated with the designated archaeological complex.~~ ~~Residential development will not be permitted on the northern part of the site.~~ ~~Planning applications for other forms of development that will encroach towards the northern part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application.~~

This is a Material Alteration – Ref. BYMA4.

Primarily Residential Site PR2

The SFRA identified a watercourse with limited risk crossing this site. In light of this, proposals for development on this site will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP 2018-2024 and contained in Appendix A of the Draft LAP.

Recommendation:

No change.

Economic Development Zone Adjacent To Site PR4

The SFRA identified a small portion of lands in this area as Flood Zone A. Given the small extent of this area, it would be disproportionate to re-zone this area. Rather, a more measured approach in this case would be to require that any potential future development that will encroach towards this part of the site may be required to submit a site specific flood risk assessment with the planning application.

Recommendation:

Insert new Policy BY-ED-7

Policy BY-ED-7: "It is a policy of the Council to consider proposals for the development of the site zoned as 'Economic Development' at Station Road, and immediately to the south-east of Site PR4, for economic development uses consistent with the zoning objectives for sites zoned for 'Economic Development' in Table 3.1 of the Plan. [Planning applications for development that will encroach towards the south-western part of the site \(refer to flood mapping\) may be required to submit a site specific flood risk assessment with the planning application.](#)"

This is a Material Alteration – Ref. BYMA5.

Strategic Residential Reserve Site (Located Immediately South of Site PR6)

The SFRA identified a large portion of lands in the south-eastern part of this site as being within Flood Zone A. On the basis that residential use is classed as 'Highly Vulnerable and that (part of) the site is located within Flood Zone A, this zoning could only be sustained on foot of a development Plan Justification Test. However, it is considered that the site would fail any such Justification Test. It is therefore recommended to amend the zoning of a triangular portion of the 'SRR' lands in the eastern and south-eastern part of the site to 'Recreation and Amenity'.

Recommendation:

Amend the zoning of a triangular portion of the 'Strategic Residential Reserve' lands (immediately south of PR6) in the eastern and south-eastern part of the site to 'Recreation and Amenity' to exclude the identified flood zone as identified on the map entitled 'Proposed Material Alteration BYMA6' contained at the end of this section of the report.

This is a Material Alteration – Ref. BYMA6

Site Identified as PR9

The SFRA identified the potential for pluvial flood risk on this site. In light of this, proposals for development on this site will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP 2018-2024 and contained in Appendix A of the Draft LAP.

Recommendation:

No change.

5.2.2 Potential Greenway/Walkway/Cycleway Routes

A central element of the Draft LAP strategy is to pursue the expansion of the network of pedestrian and cycle routes for Ballyshannon. Notwithstanding, a significant number of submissions have been received seeking an even greater focus on this issue in the Plan. A number of routes have been suggested with a particular focus on:

(1.) The provision of a footpath on the bypass section between the Donegal Road Roundabout and Rossnowlagh Road Roundabout for the benefit of walkers, joggers, pram walkers and so on. The Roads Directorate have no objections in principle to this proposal, subject to funding.

(2.) The development of greenways along the old railway routes in the town including: the old track from the north of the town out towards Creevy and Rossnowlagh (potentially joining up with the Creevy Coastal walk to provide a safe link back into the town); the route in the south of the town towards Belleek; and the old route from south of the town in the direction of Bundoran.

At the December, 2017 Council meeting to consider the Draft County Development Plan, 2018-2024 the issue of Greenways was discussed at a strategic, County-wide level. It was agreed that the new CDP will identify a total of 21 potential greenway developments for the County to provide a context in which to design a programme of delivery. Interestingly, the above-noted Ballyshannon greenways suggested in the submissions potentially align with 2 of these 21 County-level routes as illustrated below:

Route Proposed In Submission	Route to be named in CDP 2018-2024
Old track from the north of the town out towards Creevy and Rossnowlagh	Donegal Town-Bundoran
Route in the south of the town towards Belleek	Ballyshannon-Belleek
Route from south of the town in the direction of Bundoran	Donegal Town-Bundoran

Finally, another submission refers to the potential for a coastal walk running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patricks well) and continuing to join the Creevy coastal path.

It is agreed that the potential referred to above could be given greater focus in the Plan. The recommendations below are made to address this perceived deficit in the Plan.

Recommendation:

1. Amend Section 6.2 Key Planning Issues of the Draft LAP (bullet no. 12) as follows: (text to be deleted shown in strikethrough, new text shown in blue) “The need to identify and preserve a network of green infrastructure for potential greenways/walkways/cycleways/amenity areas for the purposes of recreation and amenity and as an important part of the tourism product of the town.”

This is a Non-Material Alteration - Ref. BYNMA1.

2. Add new text to Section 6.8.1 of the Draft LAP as follows: (text to be deleted shown in strikethrough, new text shown in blue)

In addition, Ballyshannon benefits from significant other existing recreational infrastructure including the open space encircled by walkway at the Mall Quay, the outdoor gym and play area, the GAA training ground and stadium, Allingham Park and the outdoor pursuits centre at the Erneside Caravanning and Camping Centre. Ballyshannon's old railway lines are additional potential recreational assets for the town. This LAP will support further additions to, and extension of, this network of recreational infrastructure.

This is a Non-Material Alteration – Ref. BYNMA2.

3. Amend the Ballyshannon Land Use Zoning Map to include an indicative pedestrian route along the bypass between the Donegal Road Roundabout and Rossnowlagh Road Roundabout as identified on the map entitled 'Proposed Material Alteration BYMA7' contained at the end of this section of the report.

This is a Material Alteration – Ref. BYMA7.

4. Amend the Ballyshannon Land Use Zoning Map to include an indicative greenway route along the old Ballyshannon to Creevy/Rossnowlagh railway as identified on the map entitled 'Proposed Material Alteration BYMA8' contained at the end of this section of the report.

This is a Material Alteration – Ref. BYMA8.

5. Amend the Ballyshannon Land Use Zoning Map to include an indicative greenway route along the old Ballyshannon to Bundoran railway as identified on the map entitled 'Proposed Material Alteration BYMA9' contained at the end of this section of the report.

This is a Material Alteration – Ref. BYMA9.

6. Include a new objective and new policy to support the potential development of greenway/walkway/cycleway projects in Ballyshannon as follows: (text to be deleted shown in strikethrough, new text shown in blue)

Objective BY-TMR-6: "It is an objective of the Council to secure the development of new greenway/walkway/cycleway projects in Ballyshannon."

This is a Material Alteration – Ref. BYMA10.

Policy BY-TMR-6: "It is a policy of the Council to protect established/historic railways in Ballyshannon to allow the development of a network of green infrastructure for potential greenway/walkway/cycleway projects and for recreational development as an important part of the tourism product of the town."

This is a Material Alteration – Ref. BYMA11.

7. Include a new objective and policy in the Draft LAP to support the potential development of a new coastal walk to join the Creevy coastal path as follows:

Objective BY-TMR-7: "It is an objective of the Council to explore the potential of achieving a coastal walk running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patricks well) and continuing to join the Creevy coastal path".

This is a Material Alteration – Ref. BYMA12.

Policy BY-TMR-7: "It is the policy of the Council to seek to preserve the route of the potential future coastal walk running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patricks Well) and continuing to join the Creevy coastal path. Developments shall only be permitted where it can be demonstrated that delivery of the said route shall not be prejudiced."

This is a Material Alteration – Ref. BYM A13.

Table 5.1: Ballyshannon Submissions

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
PUBLIC SUBMISSIONS				
BY1	Alvin Morrow	The submission relates to lands at Ballyshannon. The submission requests removal of the proposed 'Local Environment' zoning from the subject lands, and to have the lands entirely zoned as 'established development'. This would replace the two proposed zonings (part 'Established Development and part 'Local Environment' on the site, in order to facilitate a planning application.	Yes See separate folded map for Ballyshannon (Map 4)	Having regard to the small scale of the subject site, and to the nature of the lands adjoining the site to the east and west, it is recommended to remove the 'Local Environment' zoning from part of the subject site and to have the site entirely zoned as 'Established Development'. Recommendation: Rezone the subject lands from 'Local Environment' to 'Established Development' as identified on the map entitled 'Proposed Material Alteration BYMA14' contained at the end of this section of the report. This is a Material Alteration – Ref. BYMA14.
BY2	Deene Barrett Steve Churchill	1. The submission notes that a number of unique elements of Ballyshannon's history are not reflected in the Draft LAP: <ul style="list-style-type: none"> • Two separate railways in the town: 1) the Donegal narrow gauge railway in the north of the town connecting through to Creevy and Rossnowlagh to the west and Donegal and Derry to the north, and 2) the Great Northern standard gauge railway in the south of the town connecting through to Bundoran to the west and Enniskillen and Belfast to the East. • Ballyshannon's rich history as a centre for salmon fishing. • Ballyshannon has a current active and vibrant cultural community with regular annual festivals of music and arts held throughout the 	Yes See separate folded map for Ballyshannon (Map 4)	1. Ballyshannon's heritage is identified as one of the key pillars of the Draft LAP where there is potential for significant growth. The renewal and regeneration of the historic environment of Ballyshannon is the principle underlying objective for town. In this regard, Section 6.1 of the Draft LAP states "this Plan provides for a heritage-led approach to the urban renewal and regeneration of Ballyshannon which has the potential to lead to investment in strengthened tourism and retail sectors, increased investment in public realm and civic space, increased attractiveness to residents, visitors and investors and to further continued investment in the towns built heritage conservation thereby further enhancing one of the strongest assets of the town". In addition the promotion and protection of the cultural heritage of the town is at the heart of the key planning issues identified for Ballyshannon in Section 6.2 of the Draft LAP. The importance of the cultural history and heritage of

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		<p>year - Drama Festival, Rory Gallagher music festival (Europe's longest running Folk festival), and the Allingham Arts Festival etc.</p> <p>2. The submission refers to a proposed development to build a new road from the Health Campus at the Eastern end of College Street, through the market yard joining the main street north of the bridge. This proposal will result in the loss of public parking, the existing bus terminus and the level area which is used for the marquee during the folk festival. Opportunity Site 10 is identified in the Draft LAP as being a potential area for replacement car parking and should be secured as part of the process to build the new road so that car parking is not lost in the interim. Also it is unclear from the Draft LAP how the level area used for festivals and access to the bus terminal would be protected.</p> <p>3. Prior to the dam being built in the 1940s, wild salmon spawned in an area close to the Shiel hospital. This was lost during the building of the dam along with the role of the Erne Estuary as a tourist destination for salmon fishing. However, there is still</p>		<p>Ballyshannon is further underpinned in the strategic vision for Ballyshannon as set out in Section 6.3 of the Draft LAP. Measures to deliver the strategic vision for the town are set out in the detailed policies and objectives in the Draft LAP.</p> <p>Recommendation: No Change.</p> <p>2. This issue was given careful consideration during the processing of the relevant planning application ref. 16/51654. The loss of a modest amount of car parking at Market Square was, on balance, considered acceptable. As a trade-off, the proposed development creates a new through route thereby improving accessibility and traffic movement. It should be noted also that Opportunity Site 10 (located immediately to the north of the subject area) provides for, <i>inter alia</i>, additional public car parking and planned civic space.</p> <p>In response to the issues raised in relation to festivals and access to the bus terminal, this is not a matter for the Draft LAP. Events are dealt with through a separate procedure for an application for road closure. Again, the assessment of, and decision on the planning application, had careful regard for this issue.</p> <p>Recommendation: No Change.</p> <p>3. Tourism is also identified as one of the key pillars of the Draft Plan where there is potential for significant growth in Ballyshannon. The heritage-led approach to the regeneration of Ballyshannon has the potential to lead to investment in a strengthened tourism market for the town. The proposal to promote the Erne Estuary as a tourist</p>

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		<p>potential to recover a spawning ground and this potential should be protected. It may need to protect an area of fresh water close to the dam or allow the development of an improved fish pass upstream.</p> <p>4. Some of the track bed in the north of the town towards Creevy and Rossnowlagh has been built on, but there is potential to develop a greenway/cycle path on the remaining track bed - similar to the development at Burtonport. This has potential to join up with the Creevy Coastal walk and provide a safe link back into the town.</p> <p>5. The railway heritage of the town should be protected. Given that the old station house is now in a residential area it is suggested that the old cattle mart would provide a good site for the development of a railway heritage centre. The track bed towards Belleek has potential as a greenway and should be preserved.</p> <p>6. There is potential for a coastal walk running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patricks well) and continuing to join the Creevy coastal path. This should be protected in the Plan.</p>		<p>destination for salmon fishing would support the aim of the Draft LAP to promote the growth of the tourism sector. It is further noted that such a proposal is not precluded by the policies and objectives of the Draft LAP.</p> <p>Recommendation: No Change.</p> <p>4. See Response at Section 5.2.2 of this report.</p> <p>5. As previously noted, Ballyshannon's heritage is identified as one of the key pillars of the Draft LAP where there is potential for significant growth. The proposal to develop the old cattle mart as a heritage centre would support the aim of the Draft LAP to promote the heritage-led urban renewal and regeneration of Ballyshannon. It is further noted that such a proposal is not precluded by the policies and objectives of the Draft LAP.</p> <p>Recommendation: No Change.</p> <p>6. See Response at Section 5.2.2 of this report.</p>

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		<p>7. PR1 and Opp Site 9 propose the development of +38 houses and a primary access road via Bishop Street. The submission states that Bishop Street and its continuing road past Danby, Ashbrook and Woodlands to the Abbey River bridge is a dangerous narrow road and cannot take any additional traffic. An amendment to the strategic road proposed could help alleviate pressure by linking Woodlands estate with PR1 and Opportunity Site 9 and providing vehicular access to the Donegal Road at the end of Bachelors Walk and the link road as planned.</p>		<p>7. The Council has engaged Consultants to carry out a Stage 2 Strategic Flood Risk Assessment (SFRA) for the seven towns subject to the Draft LAP. The SFRA has identified a large portion of the site identified as PR1 on the Ballyshannon Land Use Zoning Map as Flood Zone B which is not suitable for residential development. A large portion of the lands to the immediate north of PR1, zoned 'Local Environment', are also subject to Flood Zone B. In accordance with the approach advocated in 'The Planning System and Flood risk Management Guidelines', it is therefore necessary to rezone PR1 as 'Recreation and Amenity' and rezone the lands to the immediate north of the site from 'Local Environment' to 'Recreation and Amenity'. Consequently there is no longer a requirement for a strategic road access through PR1 and Opportunity Site 9. Future Access to Opportunity Site 9 shall be provided from Bachelors Walk to the south of the site.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of Site PR1 to 'Recreation and Amenity' and also amend the zoning of the lands to the immediate north of site PR1 from 'Local Environment' to 'Recreation and Amenity'. In addition, remove the indicative strategic road route from the subject site (PR1) and the adjoining Opportunity Site 9 as identified on the map entitled 'Proposed Material Alteration BYMA15' contained at the end of this section of the report. <p>This is a Material Alteration – Ref. BYMA15.</p> <ol style="list-style-type: none"> 2. Amend policy BY-H-1 below to reflect the change in proposed zoning from PR1 to 'Recreation and Amenity': (text

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				<p>to be deleted shown in strikethrough)</p> <p>Policy BY-H-1: "It is a policy of the Council that all proposals for residential development on 'Primarily Residential' sites R1, R6, R7, R8 and R9 shall make provision for the indicative strategic roads access identified on the land use zoning map for Ballyshannon (Map 4) or such other strategic roads access that will facilitate the comprehensive delivery of the wider zoning objectives of that area in addition to compliance with all other relevant policies of this LAP."</p> <p>This is Non-Material Alteration - Ref. BYNMA3.</p>
BY3	Margaret Gallagher	The submission proposes the inclusion of a footpath on the bypass between the Donegal Road roundabout and Rossnowlagh Road Roundabout, completing a loop around Ballyshannon, for the benefit of walkers, joggers, pram walkers etc. in the Draft LAP.	Yes	See Response at Section 5.2.2 of this report.
BY4	Philip Mulligan		See separate folded map for Ballyshannon (Map 4)	
BY5	Mary Mulligan			
BY6	Martin Burke			
BY7	Beau Park Law Solicitors on behalf of Sean Rooney	The submission states that they have previously contacted the Council regarding the status of Smiver Bridge as a Protected Structure in the current Development Plan. Given that they have not heard back from the Council they have been advised by their Counsel to issue proceedings against the Council on this matter.	No	<p>Noted. It should also be noted that the Planning Section in Donegal County Council has engaged with the correspondent on this matter.</p> <p>Recommendation: No Change.</p>

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BY8	Linda Mc Manus	<p>1. The submission proposes the inclusion of a footpath from town up to the Morning Star roundabout, down the bypass towards Abbey River and Rossnowlagh Road Roundabout, for the benefit of walkers, joggers, pram walkers etc. in the Draft LAP.</p> <p>2. The issue of dog fouling on footpaths needs to be addressed with more signage.</p>	No	<p>1. See Response at Section 5.2.2 of this report.</p> <p>2. The issue of dog fouling on footpaths is not a material planning consideration.</p> <p>Recommendation: No change.</p>
BY9	Paul and Karen Doherty	Request to remove the 'Local Environment' and 'Visually Vulnerable' zonings from the subject lands at Back Mall, Town parks, Barony of Tirhugh to facilitate the future development of a family home on the subject lands.	No	<p>Noted. The 'Local Environment' and 'Visually Vulnerable' zonings on the subject lands are considered to be reasonable. Notwithstanding this, it is important to note that the proposed zonings do not preclude the future development of a family home on the subject lands subject to satisfying all other material planning considerations including environmental considerations. It is therefore not recommended to amend the proposed 'Local Environment' and 'Visually Vulnerable' zonings on the subject lands.</p> <p>Recommendation: No Change.</p>
BY10	Patrick Grimes on behalf of Nora Grimes	1. The submission states that there is an error on the Ballyshannon Zoning Map which identifies a Protected Structure on the subject lands. There was no Protected Structure identified on the lands in the previous Ballyshannon land use zoning map and nothing has changed since.	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>1. It is noted that there is an inadvertent error on the Ballyshannon Land Use Zoning Map which identifies the subject property as a Protected Structure. This is a mapping error and will be rectified in the final Ballyshannon Land Use Zoning Map.</p> <p>Recommendation: Amend the Ballyshannon Land Use Zoning Map to remove the Protected Structure label from the subject property.</p>

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		<p>2. Rezoning request to remove the current 'recreation and amenity zoning' from part of the subject lands overlooking the Mall Quay and Erne Estuary. The submission suggests the subject lands should be zoned as a new Opportunity Site or an extension of Opportunity Site 5 if the conditions can be agreed as suitable to both parties.</p>		<p>This is a Non-Material Alteration BYNMA4</p> <p>2. Given the fact that the subject lands are located immediately adjacent to Opportunity Site 5, there is a reasoned logic to extend Opportunity Site 5 to include the subject lands within Opportunity Site 5 as it would further increase the development capacity and potential of this site.</p> <p>Recommendation: Remove the 'Recreation and Amenity' zoning from the subject lands and extend Opportunity Site 5 eastwards to include the subject lands overlooking the Mall Quay and Erne Estuary as identified on the map entitled 'Proposed Material Alteration BYMA16' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. BYMA16.</p>
BY11	Roci Allan, Allan.Curran Architects on behalf of Harry Mc Grory	<p>Rezoning request to remove the proposed zoning of 'Partially Strategic Residential Reserve' and 'Partially Local Environment' and to zone the lands 'Primarily Residential' instead, in order to facilitate a social housing development of between 10 and 30 dwellings in association with Cluid Housing Association. The subject site is located adjacent to the indicative strategic road line and is 250 meters from Abbey Centre and Sráid Tir Conail and is served by existing services.</p>	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>The assessment of this proposal should, it is submitted, be considered in tandem with the adjacent lands to the west identified as SRR (Strategic Residential Reserve) in the Draft LAP. The subject site is narrow and these restricted dimensions would create difficulties in achieving an acceptable standard of layout. However, when considered in conjunction with the aforementioned SRR site to the west, the resultant consolidated site would present a more developable unit.</p> <p>The zoning of the majority of these consolidated lands as 'Primarily Residential' would provide for development of a large area of land 4.329 Hectares in close proximity to an existing cluster of multiple residential development. Furthermore, having regard to the fact that it is recommended to rezone PR1 (3.2 hectares) as 'recreation and Amenity' due to flooding concerns, it is considered that the proposed rezoning would be consistent</p>

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				<p>with the Core Strategy.</p> <p>Some matters of detail then require further consideration.</p> <p>(1.) In the interest of proper planning and sustainable development, a portion of the lands to the north of the proposed consolidated site adjacent to the 'Established Economic Development' lands (to the north-west) are recommended to remain zoned as 'Local Environment' to act as a buffer between the established uses on the adjoining site to the north west and the proposed housing site. Furthermore, it is noted that a large portion of the area to remain zoned as 'Local Environment' is identified as Flood Zone B which is not suitable for Residential Development in any case.</p> <p>(2.) It is noted that a small strip of land to the south of the overall proposed 'Primary Residential' lands is identified as Flood Zone B and as such any potential future access to these lands from the south would have to cross this flood zone. Any development proposal would need to be cognisant of this.</p> <p>The overall net lands after lands are omitted in recognition of the issues raised at Pts. (1.) and (2.) above comprise 18.2 hectares and have the potential to deliver 13 residential units. This proposed rezoning, together with other proposed material alterations arising from submission BY2(7), would result in a total land supply for housing purposes of 18.2 hectares. It is considered that the resultant excess in housing land supply in Ballyshannon of 1.1 hectares is within the general parameters of the Core Strategy and will be guided through a monitor and manage approach. Consequential amendments to the text of the Draft LAP are therefore also required at section 2.1.1 and table 2.3 as well as at section 6.6.2 and table 6.1 in order to</p>

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				<p>reflect the accurate amounts of land supply for housing as a result of the relevant collective Proposed Material Alterations contained in this report.</p> <p>Recommendation:</p> <p>3. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BYMA17' contained at the end of this section of the report from 'Strategic Residential Reserve' and 'Local Environment' to 'Primarily Residential'. It is also recommended to make the consequential amendments to the text of the Draft LAP as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p style="padding-left: 40px;">a. To amend chapter 6, section 6.6.2 and table 6.1, page 76 so that it reads as set out at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. BYMA17.</p> <p>4. Make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p style="padding-left: 40px;">(iii) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;</p> <p style="padding-left: 40px;">(iv) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.</p> <p>This is a Material Alteration – Ref. GENMA1.</p>

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BY12	Terry McIntyre, Chairman of Erne Enterprise Development Company	<p>1. The cultural history and heritage of the town should be protected. All of the buildings should be encouraged to retain their traditional look. Small shops should be encouraged to re-open in the town. Duncan McLaren, Dedalus Architecture is currently preparing a Streetscape Plan for the centre of the town which Donegal Co. Co. should actively seek to give full backing to.</p> <p>2. There is currently a feasibility study being</p>	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>1. Ballyshannon's heritage is identified as one of the key pillars of the Draft LAP where there is potential for significant growth. The renewal and regeneration of the historic town centre is one of the principle underlying objectives for the town. Section 6.4.2 of the Draft Lap states that "<i>the historic environment is one of the most significant and valuable attributes of Ballyshannon and, if managed and harnessed effectively and appropriately has the potential to generate significant visitor numbers (including both shoppers and tourists) and new economic investment.</i>" This LAP strategy recognises the potential of the town centre due to its exceptional historic environment and therefore advocates a heritage-led approach to its renewal and regeneration based on three pronged approach which includes "<i>providing design guidelines and standards for interventions in the built fabric of the historic town centre and also identifying an action to prepare a more detailed and standalone design guide in respect of the streets and buildings in Ballyshannon town centre.</i>" Measures to deliver the strategic vision for the town are set out in the detailed policies and objectives in the Draft LAP. Furthermore, it is noted that the Planning Section in Donegal County Council prepared the terms of reference for the study being prepared by Dedalus Architecture under the Town and Village renewal Programme 2016. It is noted that this work is ongoing and while it does not constitute a statutory document it will be a valuable guidance document for the purposes of designing and assessing relevant development proposals.</p> <p>Recommendation: No change.</p> <p>2. It is not proposed that Donegal County Council acquire the Town Clock at present; it is not part of any capital plan.</p>

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		<p>prepared for the Town Clock which has been grant aided and funded by Erne Enterprise and DLDC. In addition it is noted that the County Councillors intend to have a compulsory purchase order put on the building. The submission supports the building being brought into public ownership and recommends this is included in the Draft LAP.</p> <p>3. Opportunity Site 5 The Mall: It is submitted that Morgan's Yard/The Old Pound be demolished and converted to a public amenity areas with toilets, car parking and boating marina etc. as identified on the enclosed Map</p> <p>4. Area on south bank of the tailrace at the waste-water pumping station: It is submitted that the site as outlined on the enclosed Map 2 should be designated as a continuation of the river walk from the footbridge towards the old distillery building and mill, all for use as a public amenity area, viewing platform and parking facility. This would be a huge benefit to the proposed heritage project at the Old Distillery Building.</p> <p>5. Lands at Port na Marbh/Portnason: It is submitted that Donegal Co. Co. should acquire</p>		<p>Notwithstanding this, it is noted that the restoration and re-use of the Town Clock as a tourist/heritage attraction is not precluded by the policies and objectives of the Draft LAP and indeed would be consistent with the heritage-led approach to the regeneration of the town as advocated by the Draft LAP.</p> <p>Recommendation: No change.</p> <p>3. Noted. While part of Opportunity Site 5 is in the ownership of the Council, a large part of the site is in third party ownership. The policies for Opportunity Site 5 do not preclude the proposed uses, subject to the owner's approval and subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: No change.</p> <p>4. Agreed. The proposed continuation of the walkway is a logical extension and would add value to the project, subject to the support of the owners and subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: Extend the river walkway westwards from the footbridge towards Opportunity Site 4 as identified on the map entitled 'Proposed Material Alteration BYMA18' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. BYMA18.</p> <p>5. It is not proposed that Donegal County Council acquire the Lands at Port na Marbh/Portnason at present; it is not part</p>

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		<p>these lands (as illustrated on Map 3) from Inland Fisheries Ireland in order to clean up the riverside property, upgrade the current access and lighting facilities and install an elevated viewing platform to allow a photo opportunity area on the WAW. The lands marked B on the enclosed Map 3 on the north shore also belong to Inland Fisheries Ireland and it is submitted that the area identified B should be cleared of all vegetation to open up panoramic views of the estuary.</p> <p>6. Paths and lands either side of the bridge, southside of the river. It is submitted that 12 no. flags and flagpoles (6 each side of the roundabout) should be installed to display the flags of major Donegal clans in tandem with the proposed banners for the town (see enclosed Map 4).</p> <p>7. Outside Bus Station: The submission requests a pedestrian crossing be installed at this location for health and safety reasons (see enclosed Map 5).</p>		<p>of any capital plan. Notwithstanding this, it is noted that the proposed use of the site is not precluded by the existing zoning. Furthermore, it is considered that the viewing platform facility would be an appropriate development at this location and would enhance the tourism and leisure offer of the town. Finally, it is noted that the cleaning of vegetation on lands in the ownership of Inland Fisheries Ireland is not a not a material planning consideration.</p> <p>Recommendation: Amend the Ballyshannon Land Use Zoning Map to show identification of an elevated viewing platform along the river to allow a photo opportunity area on the WAW. This is identified on the Map entitled 'Proposed Non-Material Alteration BYNMA1' contained at the end of this section of the report.</p> <p>This is a Non-Material Alteration – Ref. BYNMA5.</p> <p>6. It is noted that the provision of such flags and flagpoles is not precluded by the policies and objectives of the Draft LAP. Any such development proposal would be assessed on its merits subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: No change.</p> <p>7. Noted and agreed. Following discussions with the Roads Directorate it is noted that a pedestrian crossing is planned in the vicinity of the Bus Station. A detailed study in relation to the most appropriate location for a pedestrian crossing for the town identified a location just up the street from the Bus Station close to the Rory Gallagher statue. In this regard, it is confirmed that a proposal has been made to</p>

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		<p>8. Market Yard: It is suggested to demolish and reconstruct the existing toilet block or at the very least a complete refurbishment of the existing facilities and that they be coin operated to deter vandalism (see enclosed Map 6).</p> <p>9. Pedestrian Crossing at Paupers Grave: It is suggested that a pedestrian crossing approx. 30 meters west of McGinleys pub on Bishop Street to cater for tourists wishing to view the new attraction (Paupers Grave). There is no footpath to serve the heritage site on the southern side of the public footpath (see enclosed Map 7).</p> <p>10. Walks around the town: It is suggested that the opening up of existing walks around the town and development of further walks in the town boundary would be beneficial. The Three Bridges walk should be developed by Donegal Co. Co. and the dangerous wall near the swimming pool should be fixed. A further extended walk to Belleek via Knather has been in planning for some time and this should be</p>		<p>road design for the preferred location.</p> <p>Recommendation: No change.</p> <p>8. It is agreed that the suggestion to demolish and reconstruct /refurbish the existing toilet block has merit albeit subject to funding. It is important to note that the proposal is not precluded by the existing zoning of the site; however, any such development proposal would be subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: No change.</p> <p>9. Noted. Donegal County Council has no plans at present to install a pedestrian crossing at Paupers Grave as the existing footfall would not support it. Notwithstanding this, the Roads Directorate are willing to explore the potential to insert a dropped kerb at this location in the interest of pedestrian safety.</p> <p>Recommendation: No change.</p> <p>10. See Response at Section 5.2.2 of this report.</p>

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		<p>developed.</p> <p>11. Workhouse: The submission acknowledges the work that is being carried out by Donegal Co. Co. in relation to the workhouse. It is suggested that the development would benefit from a Restoration Plan.</p> <p>12. Cycleway: It is requested that Donegal Co. Co. consider building a cycleway from Ballyshannon to Rossnowlagh on the old existing railway line, which could have significant tourism potential for the town.</p> <p>13. Roundabout: It is recommended that a casting fisherman being included on the roundabout at the bridge end to represent the towns fishing history.</p>		<p>11. Noted.</p> <p>Recommendation: No change.</p> <p>12. See Response at Section 5.2.2 of this report.</p> <p>13. Noted. The Draft LAP is founded on recognising the cultural and heritage value of Ballyshannon. It is recognised that public art can have a positive impact on the experience of a town. It contributes to the well being of residents and visitors alike. Any future proposals for any such proposal for a sculpture to represent Ballyshannon's fishing history at the roundabout at the bridge end of the town would be subject to detailed design considerations and funding.</p> <p>Recommendation: No change.</p>
BY13	Architectural Designs on behalf of Martin Treacy	<p>Submission relates to commercial units at Sminver/Carrickboy, Ballyshannon.</p> <ul style="list-style-type: none"> Submission states that the subject lands were rightly zoned as 'industry/employment' under the 2009-2015 Ballyshannon and Environs Land Use Zoning Map. 	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>Noted and agreed. Having regard to the nature of established uses on the subject site it is recommended to amend the zoning of the subject lands from 'Local Environment' to 'Established Economic Development'.</p> <p>Recommendation: Amend the zoning of the subject lands from 'Local Environment' to 'Established Economic Development' as identified on the map entitled 'Proposed Material Alteration</p>

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		<ul style="list-style-type: none"> It is contended that the units on site were built in the 1970's and have been used for various commercial activities down through the years and continue to be an important location for local business activities today. Under the Draft LAP 2018-2024 the site is proposed as 'Local Environment'. The owner does not see the logic in this zoning given the long-established commercial use of the site and he requests that the site be rezoned as 'Established Economic Development'. 		<p>BYMA19' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. BYMA19.</p>
BY14	Tom and Kathleen Mc Fadden	<p>Submission refers to lands that are proposed to be zoned as 'Local Environment' in the Draft LAP 2018-2024.</p> <ul style="list-style-type: none"> Submission states that the subject lands previously had the benefit of planning permission until 2012 - however, the owner was not in a position to build at the time. Submission requests that the subject lands be rezoned as 'Established Development' given the previous permission and having regard to the consideration that part of the Folio is already zoned as Established Development. 	No	<p>Noted. Having regard to the fact that the vast majority of the subject site is undeveloped it is considered that there is no justification for the re-zoning of the subject lands from 'Local Environment' to 'Established Development'. The submission also refers to an expired permission to build a family home on the subject lands. It is noted that the proposed 'Local Environment' zoning does not preclude the development of a family home on the subject lands subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: No change.</p>

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BY15	Architectural Designs on behalf of John Grimes	<p>Submission refers to land proposed be zoned as Local Environment (and Visually Vulnerable) in the Draft LAP.</p> <ul style="list-style-type: none"> • Submission requests that the subject lands be rezoned as Established Development for a number of reasons - a. The site has had the benefit of various planning approvals through the years (Ref. 00/130, 05/20395, 07/20896) and currently has a 'live' permission (12/50339). • Submission states that a commencement notice has been submitted in respect of the site and the site has the road frontage cleared, drainage in place and groundworks prepared for raft foundation. • Submission states that all DCS levies have been paid in respect of the site. • Given the current state of preparation for development, the owner requests that the site be zoned as Established Development. 	No	<p>Noted. Having regard to the fact that the vast majority of the subject site is undeveloped it is considered that there is no justification for the re-zoning of the subject lands from 'Local Environment' to 'Established Development'. The submission also refers to an expired permission to build a family home on the subject lands. It is noted that the proposed 'Local Environment' zoning does not preclude the development of limited one-off housing and small scale economic development on the subject lands subject to satisfying all other material planning considerations including environmental considerations.</p> <p>Recommendation: No change.</p>
BY16	Architectural Designs on behalf of Brian Campbell	<ol style="list-style-type: none"> 1. Submission relates to lands at Carrickboy and Sminver, Ballyshannon. Submission states that the lands are currently zoned as Opportunity Sites 7 and 8 in the Ballyshannon and Environs LAP 2009-2015. The Draft LAP would see existing Opportunity site 8 changed to Strategic Residential Reserve - the owner has no problem with this. 	No	<ol style="list-style-type: none"> 1. Comments noted in relation to the subject lands identified as Opportunity Site 8 in the Ballyshannon and Environs LAP 2009-2015. <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>2. The Draft LAP would see existing Opportunity site 7 changed to Local Environment. The owner contends that this would leave the land with very little value and would seriously hinder development potential.</p> <ul style="list-style-type: none"> • It is contended that the subject site is sequentially closer to the town than most others and can be accessed off the Mart Road roundabout. Furthermore, it is noted that the site is opposite lands currently proposed for Economic Development use, bus interchange, warehousing etc. The site is also stated to be adjacent to an existing sports ground, sharing perimeter boundaries with an established housing development and sandwiched between plots PR5 and PR6, primarily residential. • The landowner requests that the zoning of the site be left as it was previously (i.e. Opportunity Site) or alternatively changed to a mix of primarily residential and economic development, or either one of these. 		<p>2. The points made in support of the proposal, including the site zoning history, and its proximity to the town centre, are noted. In relation to the zoning history, a more rigorous assessment of housing proposals is now required than would have been so required for previous Local Area Plans for Ballyshannon. In this regard, during preparation of the Draft LAP, the Area Roads Office advised of concerns that vehicular access from the north would cause significant traffic problems due to the capacity of the existing road network in the area. Thus in order to develop the subject lands, significant road access would have to come from the south of the site. In respect of this option, the Area Roads Office has again advised that achieving such an access would be difficult to achieve due to levels and flooding concerns. It would also appear that such an access would cross third party lands and that third party consent would therefore be required. These concerns around achieving a suitable access led to the site not being put forward for residential development in the Draft LAP. Notwithstanding the points made in the submission, the access concerns remain.</p> <p>Furthermore, the Council has engaged Consultants to carry out a Stage 2 Strategic Flood Risk Assessment (SFRA) for the seven towns subject to the Draft LAP. The SFRA has identified a portion of the subject lands in the south-eastern part of the site as Flood Zone A which is not suitable for residential development.</p> <p>For these reasons it is not considered appropriate to amend the zoning as proposed in the submission.</p> <p>Recommendation: No change.</p>

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BY17	Architectural Designs on behalf of Eddie Mc Caffrey	<p>Submission relates to lands at Sminver, Ballyshannon.</p> <ul style="list-style-type: none"> Submission states that the lands in question were zoned as 'Utilities' in the 2009-2015 LAP. The Draft LAP would see the lands zoned as 'Local Environment' and it is contended that this would greatly hinder any meaningful development potential at this location. The landowner requests that the zoning be amended to 'Economic Development' as there is Established Economic Development and proposed Economic Development zoning adjacent to his land to the north, in addition to long established economic development units immediately west of the site. The site is stated to be adjacent to the Mart Link Road, with easy access to the N15. 	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>Noted and agreed. Having regard to the context of the site and adjacent uses as referenced in the submission it is recommended to amend the zoning of the subject lands from 'Local Environment' to 'Economic Development'.</p> <p>Recommendation: Amend the zoning of the subject lands from 'Local Environment' to 'Economic Development' as identified on the map entitled 'Proposed Material Alteration BYMA20' contained at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. BYMA20.</p>
BY18	Architectural Designs on behalf of Donal Kelly	<p>Submission relates to lands at Coolcholly, Ballyshannon.</p> <ul style="list-style-type: none"> Submission notes that an 'indicative road line' or 'indicative pedestrian link' is proposed (see Map A accompanying submission). The landowner seeks clarification that the proposed road/pedestrian link is intended to be as per Map B accompanying the submission (i.e. outside the landholding of Mr. Kelly). 	No	<p>Noted. Notwithstanding the concerns raised in the submission, the indicative strategic roads access as indicated on the Ballyshannon Land Use Zoning Map is considered appropriate as there already is an access corridor at this location, and as such an access would allow for the opening up of the lands to the north the development of which would be consistent with the objectives for the development of the town in a sequentially acceptable manner. Any future development proposal including junction and road access would be subject to detailed design and discussions in relation to land acquisition by a developer, should this be necessary.</p> <p>Recommendation: No change.</p>

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BY19	Phonsie Lavery; Kathleen Grimes Edward Grimes, Elaine Grimes, Eamonn McGinn, Jack & Rosemarie Downey, Louise & Martin Gallagher, David & Claire Downey & family, Desmond Walsh, Gordon & May Connell, Gemma & Vincent Connell, Dominic & Nora McGinn, Sadhbh	The submission requests a footpath that runs along the by-pass road between the Erne Roundabout and the Rossnowlagh Roundabout as it is used all year round but can be dangerous and there is sufficient space to allow for this path. The amenity would greatly contribute to the well being of all road users.	Yes See separate folded map for Ballyshannon (Map 4)	See Response at Section 5.2.2 of this report.
BY20	Philip O'Reilly			

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
BY21	Anita McGinn Sean & Mary McSharey?, Ken & Maria Monaghan, James Monaghan			
BY22	Sarah O'Reilly			
BY23	Rita (Surname illegible), Cami MacMahon, Mary MacMahon, Gloria Lynch, Maureen Keenaghan, Marian Wymbs, Clare O'Reilly, PJ O'Reilly, Rev. Cathal O'Ferrai PP, Rev. Dermot Burke,			

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	Aisling Heerey, Karen McGrath, Billy Cleary			
BY24	Diarmaid Keon, Deirdre Donagher, Ballyshannon Business Chamber	<p>The submission requests that the Economic Development Area provide a stronger identity to reflect its strategic gateway status.</p> <ul style="list-style-type: none"> • This area should be extended (as per map attached) and allow bulky retail goods, offices, hotel, motorway type services including convenience retail. • The submission does not expect these lands would be accessible from the By-Pass but accessible from the link road and further states that prior to the development it was stated by both the Local Authority and the NRA that these lands would have access along the link road. • The submission requests extension of zoning 'Strategic Economic Development Opportunity Site 1' as per map attached. 	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>Noted and agreed. The strategic potential of this area was recognised in the past due to its position adjacent to an important National Primary Road junction and high profile/visibility. For these reasons, it is agreed that the status of the site could be given a higher profile. It is proposed to do so by: expanding the site area (as proposed in the submission); and by identifying the site as an 'Opportunity Site' and also expanding the range of acceptable uses, which uses are considered to comply with the broad strategy, objectives and policies of the LAP. The range of uses that would be acceptable include: petrol station and associated services, industry, warehousing/storage, offices/call centre and R&D but excluding retailing (including convenience, comparison and bulky retailing). Any ancillary convenience retailing associated with a petrol station will be subject to Policy RS-P-10 in the Draft CDP 2018-2024 which restricts any shop associated with a petrol station to 100 sq.m. net retail area. Access to the subject site shall be from the R231 Regional Road and would be subject to detailed design proposals.</p> <p>Recommendation:</p> <p>a. Amend the zoning of the subject lands from 'Local Environment' to Opportunity Site 11 as identified on the map entitled 'Proposed Material Alteration BYMA21' contained at the end of this section of the report and make the consequential amendments to the text of the Draft LAP, including a new policy, as follows (in order to reflect the identification of the subject site</p>

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				<p>as a new Opportunity Site 11).</p> <p>b. Amend Section 6.4.3 'Opportunity Sites Located Within the Defined Town Centre' as follows: (text to be deleted shown in strikethrough and new text shown in blue)</p> <p>'A total of 1011 Opportunity Sites have been identified in this LAP due to their potential to contribute to the economic development of Ballyshannon and/or due to their particular strengths, characteristics or requirements.'</p> <p>c. Amend Section 6.5.2 'Opportunity Sites Located Outside the Defined Town Centre' by the insertion of the following new paragraph (text to be deleted shown in strikethrough and new text shown in blue)</p> <p>Opportunity Site 11: Coolcholly</p> <p>This site comprises approximately 3.093 of greenfield land located at a strategic gateway point into the town, adjacent to the Morning Star roundabout and Bachelor's Walk. It is intended to promote/facilitate development on these lands to maximise their dominant strategic gateway location/entrance to the town. Developments should actively address road frontages and the entrance to the town should demark this significant junction by appropriately scaled and designed developments which make a positive contribution to this historic and heritage town. Access to the site shall be from the R231 Regional Road and shall be subject to detailed design proposals. Having regard to the location of the site it has the potential for a range of uses including hotel, industry, warehousing/storage, petrol station and associated services, offices/call centre and R&D but excluding retailing (including convenience, comparison and bulky</p>

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				<p>retailing). Any ancillary convenience retailing associated with a petrol station will be subject to Policy RS-P-10 in the Draft CDP 2018-2024 which restricts any shop associated with a petrol station to 100 sq.m. net retail area. It is important to note that a central portion of the proposed Opp 11 has been identified as Flood Zone B in the Stage 2 Strategic Flood Risk Assessment, prepared by Consultants on behalf of the Council, and as such any potential future development of these lands would need to be cognisant of this.</p> <p>d. Amend Section 6.5.4 Economic Development Policies by inserting the following additional policy (text to be deleted shown in strikethrough and new test shown in blue):</p> <p>Policy BY-ED-7: "It is the policy of the Council to consider proposals for hotel, industry, warehousing/storage, petrol station and associated services, offices/call centre and R&D but excludes retailing (including convenience, comparison and bulky retailing) related development on Opportunity Site 11 (Coolcholly), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any proposal for ancillary convenience retailing associated with a petrol station will be subject to Policy RS-P-10 in the Draft CDP 2018-2024 which restricts any shop associated with a petrol station to 100 sq.m. net retail area. Proposals for development on this site will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP 2018-2024. Proposals shall also be required to demonstrate traffic management measures within the site and to the site from the surrounding roads</p>

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				<p>infrastructure."</p> <p>This is a Material Alteration – Ref. BYMA21.</p>
BY25	<p>Donagh Keon, Deirdre Donagher, Ballyshannon Business Chamber</p>	<p>The submission requests that reference section 2.3.1 on p28 in the previous Ballyshannon LAP be retained in the new Ballyshannon LAP to read as follows;</p> <p>"To facilitate the development of a Riverside park/Walkway with associated ancillary infrastructure and extensive Coach/car and Bus Parking. The Riverside park and Bus/Coach & Car Parking to be located on the South Bank along the Belleek Road with walkways provided on all embankments South Bank and North bank on either side of the Allingham Bridge."</p>	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>Noted. Following discussions with the Roads Directorate it is considered that the provision of Coach/Car and Bus Parking would be acceptable in principle on the south bank of the river (subject subject to satisfying all other material planning considerations including environmental considerations), particularly given the loss of public parking at Market Yard as a result of the new road. Any Coach/Car and Bus Parking proposals would be required to be located on the western section of the south bank zoned as 'Town Centre' as the remainder of the south bank is zoned 'Recreation and Amenity' and such developments precluded by the policies for such zoned areas. It is important to note that the entire south bank lands have been identified as Flood Zone A in the Stage 2 Strategic Flood Risk Assessment and, as such, any potential future development of these lands would need to be cognisant of this.</p> <p>Section 6.7.1 of the Draft LAP states: "The LAP identifies a number of indicative pedestrian linkages predominantly within the town centre and these are designed to provide a network of continuous looped routes throughout the historic built up fabric of the town and where possible along or close to the River Erne. The Council is supportive of the ongoing work to advance local initiatives aimed at the development of the 'Three Bridges Looped Walk' and are committed to engaging further with the community sector, ESB and the private sector where appropriate in the mechanisms required to complete this pedestrian infrastructure. This infrastructure is essential in terms of maximising public access to the 'green lung' along the river whilst also recognising the nature of the river as forming part of</p>

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				<p>the network of the nationally important Cathleen Falls Hydroelectric Power Station and the resulting health and safety constraints." Having regard to the above, it is therefore not considered necessary to include the suggested text from the previous Ballyshannon LAP.</p> <p>Recommendation: No change.</p>
BY26	Donagh Keon, Deirdre Donagher, Ballyshannon Business Chamber	<p>The submission requests that Policy BY-IS-4 be reworded as follows;</p> <p>"It is a policy of the Council not to permit accesses onto the Ballyshannon bypass or to permit development within a 10 metre buffer of the bypass."</p>	No	<p>Not agreed. The proposed Policy BY-IS-4 is consistent with National Policy and Countywide Policy. Any change to the wording of Policy BY-IS-4 would contravene National Policy.</p> <p>Recommendation: No change.</p>
BY27	Valerie Mc Nulty	<p>1.Requests more specific walkways and cycleways connecting housing estates for local use including the following;</p> <ul style="list-style-type: none"> • Around the town centre. • From the Mall along the coast to Abbey graveyard and Rossnowlagh roundabout and return back into town. • Connect Famine workhouse heritage site to the famine graveyard and onwards over the flyover to Donegal Roundabout. • Requests scenic walkway/cyclepath along the river and suggests access from the new roundabout at Sheil and connect to footbridge and onto the Mall. 	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	<p>1. See Response at Section 5.2.2 of this report.</p>

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		<ul style="list-style-type: none"> • Repair/Completion of Footpath from Shannons Corner to Rosstown roundabout. • Greenway along the old railway tracks both at the top of the town and the other from station road towards Bundoran. <p>2. As Ballyshannon is a historic town, provision of more public Art to reflect this.</p> <p>3. New initiative like Dublin's 'Beat the Street.'</p> <p>4. More social housing.</p>		<p>2. Noted and agreed. The Draft LAP is founded on recognising the cultural and heritage value of Ballyshannon. It is recognised that public art can have a positive impact on the pedestrian experience of a town. It contributes to the well being of residents and visitors alike. Any future proposals for public art in Ballyshannon would be subject to design proposals and subject to funding.</p> <p>Recommendation: No change.</p> <p>3. Agreed that 'Beat the Street' is a good initiative, however it is not a material planning consideration.</p> <p>Recommendation: No change.</p> <p>4. Noted. In the context of the National drive to provide more social housing the Council is actively pursuing the identification of appropriate projects across the County including Ballyshannon.</p> <p>Recommendation: No change.</p> <p>5. Noted. The Roads Directorate have confirmed that there is a</p>

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		<p>5. Removal of parking charges.</p> <p>6. ESB fences to be lowered to allow accessibility in the event of lifesaving situation required.</p>		<p>countywide review underway at present in relation to the removal of parking charges. Ultimately this is a decision that the full Council has to make whether to remove the parking charges or not.</p> <p>Recommendation: No change.</p> <p>6. Noted. It is important to note that the ESB have planning permission for the fences along the river and the Council is therefore not in a position to request the ESB to lower them. However it is further noted that the Draft LAP acknowledges the importance of the River Erne which runs through the centre of Ballyshannon. Section 6.7.1 of the Draft LAP states: "The Council is supportive of the ongoing work to advance local initiatives aimed at the development of the 'Three Bridges Looped Walk' and are committed to engaging further with the community sector, ESB and the private sector where appropriate in the mechanisms required to complete this pedestrian infrastructure. This infrastructure is essential in terms of maximising public access to the 'green lung' along the river whilst also recognising the nature of the river as forming part of the network of the nationally important Cathleen Falls Hydroelectric Power Station and the resulting health and safety constraints." Section 6.8.1 of the LAP further states "the banks of the river provide a town centre interface between land and sea as well as a sense of openness, place and space and are an asset that contributes to recreational infrastructure and health and wellbeing. The LAP therefore identifies the river zone as 'Recreation and Amenity' which will include a combination of active and inactive amenity space."</p>

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		<p>7. Repair of footpaths to the Mall.</p> <p>8. Query as to ownership of Haunted house (Connolly house) as no Community Centre in Ballyshannon.</p> <p>9. The submissions raises concerns regarding a number of traffic management issues including:</p> <ul style="list-style-type: none"> • Free flow driving system (One Way?) should be considered on College Street. • No Right turn into/from Saimer Court shopping centre at junction with Main Street. • Left turn only from Market Yard onto Main Street. <p>10. Provision of Traffic Lights and parking at Creevy School.</p>		<p>Recommendation: No change.</p> <p>7. Noted. While this is considered largely a maintenance issue it is noted that Policy T-P-12 in the Draft CDP 2018-2024 provides for the improvement and extensions of footpaths throughout the County.</p> <p>Recommendation: No change.</p> <p>8. Noted. The Council will investigate if the building requires enforcement action.</p> <p>Recommendation: No change.</p> <p>9. Noted. Discussions were held with the Roads Directorate in relation to these traffic management issues. With regards to the proposed free flow driving system on College Street it is considered that the new road proposed through Market Yard will facilitate better traffic flow around the town and as such there would be no need for a one-way system on College Street. In relation to Saimer Court shopping centre it is noted that there is an existing junction box to facilitate right turning and traffic queuing for the shopping centre. Furthermore, the Roads Directorate have confirmed that there is not enough traffic at present to warrant a 'no right-turn' at this location. Finally, it is noted that Road Design are currently looking at various options for Market Yard onto Main Street as part of the proposed new road.</p> <p>10. Creevy School is located outside the Plan boundary and</p>

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		11. Infrastructure areas to be developed in the town.		therefore cannot be considered as part of this process. Recommendation: No change. 11. Noted. The vision of the Draft LAP for Ballyshannon is to grown the town and drive regeneration. Recommendation: No change.
BY28	Diarmaid Keon, Deirdre Donagher, Ballyshannon Business Chamber	The submission requests a new policy to protect the traditional open space as follows; <i>" That the indicative road being proposed from the Knader to the Market Yard proceeds as planned, however that the traditional events that take place in this area namely the Ballyshannon Folk Festival, Rory Gallagher International Festival and the Harvest Fair be facilitated as normal for set-up, event time and post event dismantling and restoration. These events are crucial to the Economic, Culture and Tourism that Ballyshannon offers annually."</i>	Yes See separate folded map for Ballyshannon (Map 4)	Noted. Refer to response to Submission ref. BY2(2) above.
BY29	Carl Duggan	The submission includes 2 specific requests; 1. CPO the town clock and convert it into the town museum. 2. B. The Mall Quay identified as a must see destination on the Wild Atlantic Way.	Yes See separate folded map for Ballyshannon (Map 4)	1. Noted. Refer to the response to Submission Ref No. 12(2) above. 2. Tourism is also identified as one of the key pillars of the Draft Plan where there is potential for significant growth in Ballyshannon. The heritage-led approach to the regeneration of Ballyshannon has the potential to lead to investment in strengthened tourism market for the town.

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				<p>The proposal to promote the Mall Quay as a must see destination on the Wild Atlantic Way would support the aim of the Draft LAP to promote the growth of the tourism sector. It is further noted that such a proposal is not precluded by the policies and objectives of the Draft LAP.</p> <p>Recommendation: No Change.</p>
BY30	Sharon Mc Gowan	<p>1. The submission acknowledges that the LAP is a strategic vision but it should consider inclusion of a section on actions including priority, time frames and delivery agent is required.</p> <p>2. The submission states that it is necessary to tell the story of the towns' heritage use QR codes on relevant buildings and delivery of strategic events.</p> <ul style="list-style-type: none"> • Significant regeneration required from Local Government such as revitalisation and painting signage. • Works need to be undertaken to identify owners of Derelict properties and plans put in place to prepare development briefs and explore funding options. • Temporarily use Opportunity site 4 as a green area until properly invested in order to improve visual quality. • A portfolio needs to be prepared for Opportunity Sites for investor ready sites. 	No	<p>1. Noted. The Council will endeavour to implement the key objectives, policies and actions during the lifetime of the Plan, in collaboration with other agencies and the private sector as appropriate.</p> <p>Recommendation: No change</p> <p>2. Ballyshannon's heritage is identified as one of the key pillars of the Draft LAP where there is potential for significant growth. The renewal and regeneration of the historic environment of Ballyshannon is the principle underlying objective for town. In this regard, Section 6.1 of the Draft LAP states "this Plan provides for a heritage-led approach to the urban renewal and regeneration of Ballyshannon which has the potential to lead to investment in strengthened tourism and retail sectors, increased investment in public realm and civic space, increased attractiveness to residents, visitors and investors and to further continued investment in the towns built heritage conservation thereby further enhancing one of the strongest assets of the town". In addition the promotion and protection of the cultural heritage of the town is at the heart of the key planning issues identified for Ballyshannon in Section 6.2 of the Draft LAP. The importance of the cultural history and heritage of Ballyshannon is further underpinned in the strategic vision for Ballyshannon as set out in Section 6.3 of the Draft LAP.</p>

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		<p>3. Greenway required from Bundoran via Finner and from Belleek via the Knader.</p> <ul style="list-style-type: none"> Promotion and marketing of walks at Ballyshannon, Creevy, Rossnowlagh. Promotion of walks with Forestry service for walks at the Knader. 		<p>Measures to deliver the strategic vision for the town are set out in the detailed policies and objectives in the Draft LAP.</p> <p>Recommendation: No Change.</p> <p>3. See Response at Section 5.2.2 of this report.</p>
BY31	Bob Kennedy	The submission requests footpath to link between Ballyshannon and Rossnowlagh included in the Local Area Plan.	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	See Response at Section 5.2.2 of this report.
BY32	Donagh Keon, Deirdre Donagher, Ballyshannon Business Chamber	<p>This submission requests that Opportunity Site 2 be redesignated as part of the core town centre. It is contended that this site previously had a retail function and is the most readily developable site closest to the town centre, with good road access.</p> <ul style="list-style-type: none"> The submission contends that it is of crucial importance for Ballyshannon to have a Masterplan site to allow for core retail in the town centre. 	No	<p>Noted. Having regard to the location of Opportunity Site 2 and the distance of the nearest part of the site to the edge of the town centre, it is not considered appropriate to redesignate the site as part of the core town centre. Notwithstanding this, the physical constraints of the existing town centre were acknowledged previously resulting in support in the Plan for a mix of convenience and/or bulky retail uses in addition to enterprise, business and commercial development. Furthermore, the policy recognises the strategic location of the subject site as an edge-of-centre site and its development potential as a viable economic use which would represent sustainable and positive development for Ballyshannon.</p>

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				Recommendation: No change.
BY33	Donagh Keon, Deirdre Donagher, Ballyshannon Business Chamber	<p>1. This submission requests that Opportunity Site 1 be renamed Masterplan for Manufacturing, Service Business' and IT company function - Opportunity Site 1 - Portnason Industry Park.</p> <ul style="list-style-type: none"> The submission states that the industry park is owned by Donegal County Council and notes that the LAP needs to give serious attention to this site and the through the LEO make this site a Development Hub for new start-ups and existing business relocation to this site. Submission states that there are already manufacturing, service and IT business within the industry park but all efforts to enhance the park by way of a masterplan need to be explored in conjunction with all relevant agencies. The submission states that the IDA has interestingly and importantly retained a 1 acre site within the industry park at Portnason. 	No	<p>1. Noted. The Masterplan approach is most appropriately used when dealing with a greenfield site and where a variety of uses is required. The subject site is already partially laid out and it is the case also that the proposed uses fall within the single broad uses of industry, IT, research and so on. Notwithstanding, following consultation with the Local Enterprise Office manager, it is agreed that a more proactive approach to the promotion and marketing of the site should be explored, particularly given the increased economic development function of the Council. Notwithstanding the fact it is not recommended to rename Opportunity Site 1 as a Masterplan site it is noted that the proposed uses are not precluded by the policy. In the interests of clarity it is recommended to amend the text associated with opportunity Site 1 (Section 6.5.2 of the Draft LAP) to explicitly include the following uses: manufacturing, service business and IT company function.</p> <p>Recommendation:</p> <p>1. Amend the text associated with Opportunity Site 1 in Section 6.5.1 of the Draft LAP as follows: (deleted text shown in strikethrough; new text shown in blue)</p> <p>Opportunity Site 1: Business Park at Carrickboy</p> <p>This site comprises approximately 10.7 hectares of land having previously been the location of the IDA Business Park in Ballyshannon. The site contains a number of vacant commercial buildings, the Ballyshannon IT Centre which houses the 999 emergency call centre and an area of undeveloped lands to its</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>most southerly point. Its development has the potential to open up lands for development through the delivery of strategic roads that would improve accessibility and movements south of the river. The site has an existing access point and service road via a local road to West Port which may require improvements in width, alignment and junction arrangement to accommodate significant development. These lands have the potential to provide for a cluster of economic development including enterprise, commercial development, research, innovation, business, manufacturing, services, IT, start-ups and health related or education. The site is significantly under-utilised at present and the Council will explore the most appropriate means of addressing this issue.</p> <p>2. Amend the text of Policy BY-ED-1 associated with Opportunity Site 1 in Section 6.5.2 of the Draft LAP as follows (deleted text shown in strikethrough; new text shown in blue)</p> <p>Policy BY-ED-1 "It is the Policy of the Council to consider proposals for the development of enterprise, commercial development, research, innovation, digital technology, business, manufacturing, services, IT, start-ups and health related or education on Opportunity Site 1 (Business Park at Carrickboy), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any development proposals shall make appropriate provision of the delivery of indicative Strategic Roads. Residential and retail development shall not be permitted at this location. The Council will explore the most appropriate vehicle with which to promote and market the potential of this site, subject to the identification</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				of appropriate resources.” This is a Material Alteration – Ref. BYMA22.
BY34	Paul McLoone	<p>1. This submission proposes the creation of a walkway from the Mall Park to the Abbey Wall and the development of other walks at the Knather and at Ballure Lane.</p> <p>2. Submission requests that a footpath be provided on the bypass on the Rossnowlagh side as it is quite dangerous.</p>	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	See Response at Section 5.2.2 of this report.
BY35	Marie McLoone	<p>1. This submission proposes the creation of coastal walks from Rossnowlagh to Bundoran and also around Assaroe Lake.</p> <p>2. Submission requests that a footpath be provided on the bypass on the Rossnowlagh side.</p>	<p>Yes</p> <p>See separate folded map for Ballyshannon (Map 4)</p>	See Response at Section 5.2.2 of this report.
PRESCRIBED BODIES				
PB5	TII	<p>1. Welcomes objectives BY-IS-4 to safeguard and protect the carrying capacity of the N15 and policy BY-IS-4 restricting access to the bypass.</p> <p>2. State that planning applications for proposals on 'Economic Development' zoned lands in proximity to national road junctions should be accompanied by a Traffic and Transport Assessment in accordance with the TII Traffic and Transport Assessment Guidelines 2014. Also state a Road Safety Audit should be undertaken where relevant.</p>	No.	<p>Noted.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		State that TII would welcome this matter being addressed and included in the LAP prior to adoption.		
PB6	Irish water	The submission refers to water services in Ballyshannon and notes that the completion of works for the town is anticipated to be completed by 2020.	No.	Noted. Recommendation: No change.

TEXT ASSOCIATED WITH REF. BYMA17

To make consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing by amending chapter 6, section 6.6.2 and table 6.1, page 75 so that it reads as set out below:

6.6.2 Methodology for the Identification of Housing Lands

In order to identify the 19 hectares of residential land required in Ballyshannon, an analysis of available lands within the defined plan boundary and their suitability for residential development was undertaken. The criteria used in the analysis included, inter alia, – distance of lands from the town centre; compatibility with adjoining land uses; flood risk; the presence of sites of conservation importance; serviceability in relation to wastewater and water; accessibility and visual vulnerability as examples. Arising from this assessment the most suitable lands for housing within Ballyshannon are made up of combination of lands zoned **10 sites identified as** ‘Primarily Residential’ and **part of 1 other area of land which is identified as ‘Opportunity Site 1’ and which has the potential for mixed use development including an element of residential land uses.** Table 5.1 shows that a total of ~~22~~ **18.2** hectares of land in Ballyshannon is provided through the identification of ‘Primarily Residential’ lands, with capacity to deliver circa ~~263~~ **217** residential units while a total of circa ~~20~~ **5**-units are targeted for delivery through Opportunity Site ~~4~~ **and Opportunity Site 6**. As shown in chapter 2 of this LAP, the level of land supply in Ballyshannon for the purposes of residential development is broadly consistent with the Core Strategy of the Draft CDP.

Extract of Table 6.1 from Draft LAP 2018-2024: Total Lands Identified to Meet Residential Housing Need in Ballyshannon

Site Ref	Zoned as ‘Primarily Residential’ or ‘Opportunity Site.’	Area of site (ha)	Potential number of housing units to be delivered
PR1	Primarily Residential	4.3 3.2	51 38
PR2	Primarily Residential	2.3	27
PR3	Primarily Residential	1.4	17
PR4	Primarily Residential	0.7	8
PR5	Primarily Residential	0.2	2
PR6	Primarily Residential	1.8	22
PR7	Primarily Residential	1.6	19
PR8	Primarily Residential	3.0	36
PR9	Primarily Residential	1.5	18
PR10	Primarily Residential	1.4	17
Total ‘Primarily Residential’		18.2	217
OPP4	Opportunity Site	1.0	18
OPP6	Opportunity Site	0.3	6
Total ‘Opportunity Site’		1.3	24

6 BRIDGEND SUBMISSIONS

6.1 Overview

A total of 88 submissions were received comprised of:

- 84 from members of the public; and
- 4 from prescribed bodies.

6.1.1 Public Submissions

Of the 84 public submissions, 83 (ref. nos. BE2-BE84 inclusive) refer exclusively to a single issue, namely the provision of traffic calming at St. Aengus' National School, including road ramps and a crossing for children. A summary of the issues raised and the response is provided in Table 6.1 below. A list of the names of those persons who made submissions on these issues is included in Appendix D of this report.

The single remaining public submission (BE1) proposes the inclusion of a site to the east of the existing Aileach Valley estate, and its zoning as an Opportunity Site that would allow for residential development. The response is provided in Table 6.2 below.

6.1.2 Prescribed Bodies

The four prescribed body responses were received from: the Minister for Housing, Planning and Local Government (DHPLG) [PB1]; Transport Infrastructure Ireland (TII) [PB4]; Irish Water (IW) [PB6]; and Derry City & Strabane District Council (DCSDC) [PB4].

None of these submissions gives rise to any serious concerns and the points raised are addressed in the responses provided in Table 6.2. The DHPLG identifies one issue in relation to the weight to be given to the position of Irish Water in terms of future taking-in-charge of wastewater treatment and disposal plant. The TII submission emphasises the need for consultation on the proposed village enhancement scheme; the SEDOS site access arrangements; and the proposed Derry-Buncrana Greenway. The IW submission is generally informative in nature. Finally, the DC&SDC submission is again generally informative in nature noting the strong working links now established between the two authorities.

6.2 Other Issues Arising

6.2.1 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of Consulting Engineers to prepare a Stage 2 Strategic Flood Risk Assessment (SFRA) in respect of the seven towns covered by the Draft Local Area Plan. Following completion of this report, a number of issues were identified in relation to various sites within the Bridgend Plan boundary. Where these issues refer to lands the subject of public submissions, they are responded to in respect of the individual submission in Table 6.1. Responses to other issues raised which do not relate to the public submissions are set out below.

Strategic Economic Development Opportunity Site

In the SFRA report, a significant part of the western side of the site on both the northern and southern side of the National Primary Road is identified as being within Flood Zone B. Furthermore, lands immediately adjacent to the north of the site along the entire extent of the site's northern boundary are

zoned as Flood Zone A (refer to flood mapping). The Flood Report notes that the site is appropriate for development of 'less vulnerable' land uses (the strategic economic uses proposed in the Draft LAP fall within the definition of 'less vulnerable') according to the sequential approach but recommends that the policy should be bolstered to include the requirement for a site specific flood risk assessment, in particular the attenuation of rainwater and run-off during flood events. This recommendation is agreed.

Recommendation:

1. Amend para. 7.5.1 on **Strategic Economic Development Opportunity Site** by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue)

'A part of the western area of the site has been identified as falling within Flood Zone B, whilst lands to the north of the site have also been identified as being within Flood Zone A. Development proposals for development that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Such assessments shall be required to address, inter alia, proposals for the attenuation of rainwater and run-off during flood events.'

2. Amend Policy BE-ED-1 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BE-ED-1: "It is a policy of the Council to facilitate economic development proposals of a strategic economic development nature inclusive of proposals related to information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall: (1.) dovetail with, and incorporate as necessary, the Derry-Buncrana Greenway Scheme; and (2.) provide for widening of the public roads to the west and south of the site along those site boundaries. Proposals for development that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Such assessments shall be required to address, inter alia, proposals for the attenuation of rainwater and run-off during flood events."

This is a Material Alteration – Ref. BEMA1.

Opportunity Site 1

In the SFRA report, parts of the site are identified as being within Flood Zone A and parts are also identified as being within Flood Zone B (refer to flood mapping). The proposed town centre uses fall within the category of 'Less Vulnerable' developments. Less vulnerable developments in Flood Zone A require a development plan Justification Test. This test was carried out by the Consultants and the site passed the justification test for development of 'less vulnerable' land uses such as commercial activity. The report also advises that a site specific flood risk assessment should be required as a part of the policy. This recommendation is agreed and it is also recommended that the policy is modified further to clarify that residential development will not be acceptable in light of the identified Flood Zone information.

Recommendation:

1. Amend para. 7.6.1 on **Opportunity Site 1** by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue)

'Development proposals that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Having regard to the Flood Zone information, residential development will generally not be acceptable at this location.

2. Amend Policy BE-OPP-1 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BE-OPP-1: "It is a policy of the council to consider proposals both for town centre/retail uses and also for general commercial developments, including light industrial, warehouse, wholesale, or storage use, car servicing, on lands identified as Opportunity Site 1 (Opp 1) on the accompanying land use zoning map (Map 1 refers)."

Development proposals that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Having regard to the Flood Zone information, residential development will not generally be acceptable at this location.

This is a Material Alteration – Ref. BEMA2.

Opportunity Site 2

The SFRA report identifies a significant localised flooding issue within an area identified as Flood Zone A on part of the northern edge of the site (refer to flood mapping). These issues are considered to require the re-zoning of this portion of the site to effectively remove development potential at that locality. Another portion of the site running parallel with the local road is identified as falling within Flood Zone B. Consistent with the general approach of preventing residential development in Flood Zones A and B, the recommendation is to amend the policy to prevent residential development on this part of the site, and to require a site specific flood risk assessment in respect of any other type of development.

Recommendation:

1. Amend the zoning of a part of the northern area of the site identified as Opportunity Site 2 to 'Recreation and Amenity' to exclude the identified Flood Zone A, as identified on the map entitled 'Proposed Material Alteration BEMA3' contained at the end of this section of the report.

2. Amend para. 7.6.1 on **Opportunity Site 2** by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue)

'An area to the north of the site that would otherwise appear to logically fall within the boundaries of the site is omitted and newly identified as 'Recreation and Amenity' as this site has been identified as falling within Flood Zone A and subject to localised flooding concerns (refer to flood mapping). Another section of the southern part of the site and running parallel with the local road is identified as falling within Flood Zone B (refer to flood mapping). Residential development will not be permitted on this part of the site. Proposals for other forms of development that will encroach towards this area of the site may be required to submit a site specific flood risk assessment depending on the scale and position of the development.'

3. Amend Policy BE-OPP-2 as below (text to be deleted shown in strikethrough, new text shown in blue):

Policy BE-OPP-2: "It is a Policy of the Council to consider proposals for the development of residential, light Industrial/commercial, or tourism-related uses; or for development

providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area. Proposals for retail development will not be favourably considered unless it can be demonstrated that the proposal would comply with the sequential approach to retail development and retail impact assessment requirements as set out in the County Retail Strategy. Proposals for petrol filling stations/fuel storage depots and amusement arcades/indoor amusement areas or other large scale single use developments shall not be permitted in accordance with the terms of Policy BE-TC-1 above. The undernoted criteria shall apply:

- a) Vehicular access shall only be permitted via the County Road to the east of the site. Pedestrian access shall be required onto both the National Road and County Road;
- b) Layout and design shall not give rise to sky-lining on the elevated parts of the site.
- c) Connection to the town sewer following commissioning of the upgraded public treatment works.
- d) Compatibility of any proposal with an overall cohesive development proposal for the entire Opportunity Site area. An overall site layout plan for the entire Opportunity Site shall be required in this regard.
- e) Residential development will not be permitted on that part of the site identified as falling within Flood Zone B. Proposals for other forms of development that will encroach towards this area of the site may be required to submit a site specific flood risk assessment depending on the scale and position of the development.'

This is a Material Alteration – Ref. BEMA3.

Opportunity Site 3

In the SFRA report, a significant portion of the site is identified as being within Flood Zone A and a further portion is identified as falling within Flood Zone B (refer to flood mapping). Consistent with the Flood Guidelines, residential development will not be permitted on these lands. Furthermore, in this particular case, given the extent of Flood Zone B and the low-lying nature of these lands, it is recommended that residential use is prohibited for the entire site. For the other uses identified in the policy (the principle of which remains acceptable under the Flood Guidelines), the recommendation is to amend the policy to require a site specific flood risk assessment and that such assessment would include modelling of the watercourse that crosses the site.

Recommendation:

1. Amend para. 7.6.1 on **Opportunity Site 3** as below (text to be deleted shown in strikethrough, new text shown in blue)

Opportunity Site 3

~~Residential~~; or Light industrial/commercial; or tourism-related; or development providing for a combination of some, or all, of the aforementioned uses **may be considered**. This Opportunity Site is situated between the main built-up area of Bridgend to the west (with residential development to the north and to the south-west, whilst to the west is located the central open space area proposed in this LAP), and the Strategic Economic Development Opportunity to the east. The site is currently bisected by the narrow L-8041-1 County Road. The site could be developed in one of two ways: (1.) two separate developments either side of the public road, in which case widening of the existing road, together with the provision of a footpath, public lighting and drainage improvements shall be required; or (2.) one consolidated development facilitated by the re-location of the public road to the eastern side of the site and its dedication to Donegal County Council in accordance with the required statutory

procedures. The new road line would again be constructed by the developer together with required junction work, associated footpaths, public lighting and drainage.

The site is somewhat removed from the public sewer network but developers will be required to identify a suitable route to connect to this network. Finally, it is reasonable to expect that any permitted layout will be required to provide for suitable pedestrian connectivity through to, and from, the proposed public open space area to the west.

2. Amend Policy BE-OPP-3 as below (text to be deleted shown in strikethrough, new text shown in blue)

Policy BE-OPP-3: "It is a Policy of the Planning Authority to consider proposals for the development of ~~residential~~, light Industrial/commercial, or tourism-related uses; or for development providing for a combination of some, or all, of the aforementioned uses **on lands identified as Opportunity Site (Opp 3)** subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area. Two development model options shall be considered:

- a) Two separate developments either side of the public road, in which case the following shall be required:
 - (i) widening of the existing L-8041-1 road along its entire length, together with the provision of a footpath, public lighting and drainage improvements as necessary;
 - (ii) the widening of the L-7931-3 road along the southern frontages of the sites, together with the provision of a footpath, public lighting and drainage improvements as necessary; and
 - (iii) improvements to the junction of the L-8041-1 and L-7913-3 roads; or
- b) One consolidated development facilitated by the re-location of the public road to the eastern side of the site and constructed to the appropriate standards and its dedication to Donegal County Council in accordance with the required statutory procedures. The new road line would again be constructed by the developer together with required junction work, associated footpaths, public lighting and drainage. The following will apply:
 - (i) Proposals for retail development will not be favourably considered unless it can be demonstrated that the proposal would comply with the sequential approach to retail development as set out in the County Retail Strategy. Proposals for petrol filling stations/fuel storage depots and amusement arcades/indoor amusement areas or other large scale single use developments shall not be permitted in accordance with the terms of Policy BE-TC-1.
 - (ii) Connection to the town sewer following commissioning of the upgraded public treatment works.
 - (iii) Creation of a pedestrian link to and from the proposed amenity/open space area to the west.

'Development proposals may be required to submit a site specific flood risk assessment to include modelling of the on-site watercourse depending on the scale and position of the development.'"

This is a Material Alteration – Ref. BEMA4.

6.2.2 Derry-Buncrana Greenway

The Greenways Officer has recommended a small number of amendments to the Draft LAP in respect of the Greenway issue. The recommended changes arise largely due to the fact that a detailed examination of the exact route has commenced and that it has already been established that the route identified on the Draft LAP Land Use Zoning Map could be amended significantly. It is therefore

recommended that the route as identified on the Draft Land Use Zoning Map be deleted. However, in order to maintain the profile of the project and to alert potential developers to the ongoing project planning and development process, it is recommended that the relevant objective and policy already contained in the Plan text be copied onto the Land Use Map.

Recommendation:

1. Insert new para. immediately before the para. headed 'Flooding' on page 96:

'Sustainable Transport

The location of Bridgend within a 3 to 4km radius of several centres of employment as well as recreational facilities on both sides of the Border provides opportunity for sustainable forms of transport, including walking and cycling to replace a percentage of carbon based car journeys. Many of the challenges to pedestrian road users within the village centre identified in Section 7.4 also present difficulties for cyclists, while the lack of cycling infrastructure linkages from the village to the nearby employment and amenities is also a barrier to encouraging sustainable transport.'

This is a Non-Material Alteration. – Ref. BENMA1.

2. Amend Objective BE-IS-3 as follows (text to be deleted shown in black strikethrough, and new text shown in blue).

Objective BE-IS-3: "It is an objective of the Council to improve pedestrian and cycle accessibility throughout the Plan area ~~and to improve pedestrian and cycling linkages from the plan area to nearby areas of employment and recreational facilities.~~"

This is a Non-Material Alteration. – Ref. BENMA2.

3. Delete para. 7.10.1 and replace with the new text below (new text shown in blue).

As part of the North-West Greenways Network project, funding was recently allocated under the INTERREG VA programme 2014-2020 for the construction of a Greenway between Derry and Buncrana via Bridgend. A key aim of this project is to deliver high quality, safe Greenway networks, enhancing linkages between communities and promoting sustainable transport opportunities.

A Study Area (see Figure 7.5) has been identified for development of Route Options and a Constraints Study and Route Selection process is expected to be carried out in advance of applications for Planning approval with construction also programmed to happen within the life of this Local Area Plan. Public Consultations on the Route Selection process are expected to be carried out in 2018 and the preferred route identified under this process shall be considered in and masterplans or development proposals.



This project has the potential to provide both a sustainable transport alternative and enhance recreational opportunities for the residents of the village and visitors alike.

During the detailed design phase of this project, there may be opportunities for pedestrian issues as discussed above for the northern side of the National Road to be considered with a view to incorporating such solutions into the design as and where possible and appropriate

This is a Material Alteration - Ref. BEMA5.

4. Delete Greenway route identified on Draft LAP Land use Zoning Map.

This is a Material Alteration – Ref. BEMA6.

5. Copy Objective BE-TR-1 and Policy BE-TR-1 onto the Land Use Zoning map approximately in the vicinity of the area identified as Opp Site 1.

This is a Non-Material Alteration – Ref. BENMA3.

6.2.3 Bridgend Strategic Road Links

The Council's National Roads Design Office (NRDO Office) has examined the Draft LAP and advised of an issue in relation to Objective BE-TC-1, the wording of which is reproduced below for ease of reference.

Objective BE-TC-1 *It is an Objective of the Council to examine options for an alternative strategic road link between Donegal and Derry in the Bridgend area to enable the achievement of a quality, sustainable village centre, and the sustainable growth of the centre.*

The NRDO Office advises that the Objective as drafted could be interpreted as being primarily concerned around the enhancement of the village and that any new strategic road would be little more than a means to that end, and that the broader strategic economic and road transportation benefits of improving this section of the critical N13 TEN-T link between Letterkenny and Derry may be unintentionally down-played as a result.

This concern is considered to be valid and the recommendation below is made to address this issue and thereby give the appropriate weight of profile to the inherent importance of the road project in terms of the critical strategic economic and transport benefits it would be provide.

Recommendation:

Amend wording of Objective BE-TC-1 as follows (text to be deleted shown in black strikethrough, and new test shown in blue):

Objective BE-TC-1: "It is an Objective of the Council to examine options for an alternative strategic road link between Donegal and Derry in the Bridgend area ~~to improve this section of the critical N13 TEN-T link between Letterkenny and Derry and also thereby~~ to enable the achievement of a quality, sustainable village centre, and the sustainable growth of the centre

This is a Non-Material Alteration. – Ref. BENMA4

6.2.4 Strategic Economic Development Opportunity Site (and Derry-Buncrana Greenway)

The Greenways Project Officer has advised of a long-term objective of developing an alternative section of the Derry-Buncrana Greenway along the route of the Skeoge River within the northern fringes of the Strategic Economic Development Opportunity Site (SEDOS 1), with the benefit of this section being off-road. Notwithstanding the long-term nature of this ambition, it is considered reasonable to identify this objective, given the generous dimensions of this site. This requires amendments to the written statement as per the recommendation below.

Recommendation:

1. Add new para. at end of Section 7.5.1

'The ambition of providing a greenway between Derry and Buncrana, and passing through Bridgend, is addressed in Section 7.10.1 below. It is likely that the selected route will proceed along the National Primary Road Corridor, or parallel with it, for the entire length of the identified Strategic Economic Development Opportunity Site (SEDOS1). Notwithstanding, there is also an associated ambition in the longer-term to provide another section of greenway within the northern fringes of the SEDOS1 site.'

2. Amend Objective BE-ED-1 as follows (text to be deleted shown in black strikethrough, and new test shown in blue).

Objective BE-ED-1: It is an objective of the Council to develop the lands zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1) for strategic economic development inclusive of identifying an agreed access solution to said lands onto the N13 in consultation with Transport Infrastructure Ireland and the Council's strategic partners in Northern Ireland. The Council also notes the scope and potential mutual benefits of managing the development of the Bridgend SEDOS 1 site as part of a joint approach with DC&SDC that would also take in the economic development lands on the DC&SDC side, ~~and that~~

would allow for the construction of the Derry-Buncrana Greenway.

3. Amend Policy BE-ED-1 as follows (text to be deleted shown in black strikethrough, and new text shown in blue).

Policy BE-ED-1: It is a policy of the Council to facilitate economic development proposals of a strategic economic development nature inclusive of proposals related to information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall: (1.) dovetail with, and incorporate as necessary, the Derry-Buncrana Greenway Scheme **inclusive of potential routes along the northern and southern edges of the site**; and (2.) provide for widening of the public roads to the west and south of the site along those site boundaries.

This is a Material Alteration – Ref. BEMA7.

6.2.5 Proposed Additional Opportunity Site

The Draft Land Use Zoning Map boundary includes the remaining, undeveloped part of the overall Aileach Valley estate as previously permitted. This is an error as, if the site was to be included, it should have been identified as an Opportunity Site in recognition of its 'undeveloped but with development potential' status. Having regard to the previous history of permission on the site, to its relatively small scale, and to the visible preliminary site works, it is considered reasonable to identify this site as an Opportunity Site. Further support for this approach is provided by the loss of previously-identified potential residential development at Opportunity Site 1, Opportunity Site 2 (in part) and opportunity Site 3.

Recommendation:

1. Amend Land Use Zoning Map to identify a further Opportunity Site comprised of the undeveloped section of the Aileach valley estate previously granted permission.
2. Insert additional para. at Section 7.6.1

Opportunity Site 5

Residential. Whilst this site is located on the edge of the village, this site is considered to constitute a modest opportunity for a small residential development having regard to the history of planning permission on the site and the fact that the site does fall within the long-established town boundary.

3. Insert additional Policy:

Policy BE-OPP-5: It is a Policy of the Planning Authority to consider proposals for residential development subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area.

- a) Provision of a 2m-wide footpath and public lighting along the entire site frontage to connect into the existing footpath to the north of the site.
- b) Connection to the public sewer following commissioning of the upgraded public treatment works.

This is a Material Alteration – Ref. BEMA8 .

Table 6.1: St. Aengus' National School Bridgend

Summaries of Submissions with regard to traffic concerns/speeding (Refer to Appendix D for names of parties that lodged submissions)

Generalised Submissions	Summary of	Response and Recommendations Arising
<p>The submission is a petition signed by multiple people requesting the following:</p> <ol style="list-style-type: none"> 1. Provide traffic calming at St. Aengus' National School Bridgend including road ramps and a crossing for children. 		<p>Noted. This issue is already captured in the Draft LAP at Policy BE-IS-1, the relevant supporting text on Pages 95/96, and also on the Land Use Zoning Map for Bridgend. Notwithstanding, and whilst acknowledging that the location already has some traffic calming measures in place, the number of submissions underlines the strength of public concern around this issue. In light of this, Road Design will be requested to review the location and undertake pedestrian and traffic speed surveys and to report and make recommendations as to how safety could be improved. The identification of appropriate funding must also be considered.</p>

Table 6.2: Bridgend Submissions – Summary

Ref.	Organisation/ Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
PUBLIC SUBMISSIONS				
BE1	Harley Newman Planning Consultants on behalf of PJ McDermott Group	<p>The submission relates to lands at Elaghbeg, Bridgend and requests the undernoted amendments. The requests are made on the basis of concerns that the Draft Plan's Opportunity sites may not realise any significant amount of housing due to the limited size of Opportunity Site OPP4, and to the other potential uses identified on the remaining Opportunity sites.</p> <p>1. Extend the town boundary of Bridgend to the north-east to include the subject lands as shown on Map 1 in the submission. The subject lands are adjacent to the Aileach Valley estate and would be a natural extension to this existing housing estate.</p> <p>2. Zone the subject lands as Opportunity Site 5 in the LAP with the following wording: Opportunity Site 5 <i>"Residential. As a consolidation of and natural extension to the established Aileach Valley housing estate to the north of the town centre, this site, which is within close walking proximity of the town centre, constitutes the optimum location to provide high quality residential development for the town."</i></p> <p>3. Include a new policy for the suggested Opportunity Site 5 with the following wording:</p>	<p>Yes</p> <p>See A3 map for Bridgend (Map 1) inserted at the end of this table.</p>	<p>It should be noted that the settlement boundary identified in the Draft LAP provides for the development of a further 25 units or thereby in this part of Bridgend on a site ('existing site') located immediately to the west of the proposed site. The 'existing site' was proposed for inclusion within the Draft LAP settlement boundary as the outcome of a balanced consideration of several factors. In favour of its inclusion, the planning history thereon was considered whereby planning permission was previously granted for residential development. Also considered was the a need to provide for some options for modest levels of housing development in the village. It was considered that in the circumstances of this particular case, such modest further development should be accommodated in this part of the village notwithstanding the broader objective of seeking to consolidate the village by means of prioritising development opportunities immediately around the village centre (refer Opportunity Sites OPP1, OPP2, and OPP3).</p> <p>The submitted proposal to extend the boundary further to the east should be considered in the above context. Furthermore, the overall housing numbers that could be developed if the zoning request was accommodated should also be considered. With 25 existing houses and capacity in the existing zoned area for a further 25 units or thereby, the development of the proposed site would see the potential overall housing number in this part of the village increase to around 90 to 100 units. It is considered that development of this scale would be</p>

Ref.	Organisation/ Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Policy BE-OPP-5: <i>"It is a Policy of the Planning Authority to consider proposals for residential development subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area.</i> <i>(a) connection to the town sewer following commissioning of the upgraded public treatment works."</i></p>		<p>disproportionate to a village of the scale of Bridgend at an unfavourable location relative to the village centre, and would also be disproportionate to the current low and projected demands for such housing in the village.</p> <p>Recommendation: No Change</p>
PRESCRIBED BODIES				
PB1	Department of Housing, Planning & Local Government	<p>Specific Comments Re Bridgend:</p> <p>Notes that Bridgend requires upgrades to the existing waste water treatment systems in order to provide for any population expansion and that the upgrade is identified in the Irish Water Investment Plan 2017 – 2021. However, within the text, the plan is flexible on the potential of interim treatment plants. Recognising past and very serious difficulties with Developer Provided Infrastructure (DPI) for water services, the Department would be very strongly of the view that such solutions may only be considered in the context of the agreement of Irish Water and within the terms of its connections policy and the fit of the</p>	No	<p>Noted. All proposals for multiple residential developments are referred to Irish Water in accordance with established procedures. Permissions will only be granted on the basis of positive recommendations of Irish Water, save for exceptional, unforeseeable circumstances</p> <p>Recommendation: No change</p>

Ref.	Organisation/ Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		given proposal with its strategic network investment approach. Your authority is specifically requested to engage with Irish Water on this point and to take any views on board in the finalisation of this plan.		
PB4	Transport Infrastructure Ireland (TII)	<p><u>1. Town/Village Centre Objectives and Action</u> Notes proposals to prepare a Bridgend Village Enhancement Scheme/N13 Corridor Study and acknowledges that the Draft Plan identifies the objective to minimise impact on the operational effectiveness of the N13, national primary road; Objectives BE-TC-1, BE-TC-2 and Action 1 refer</p> <p>Agrees that such objectives should be developed complementary to the strategic function of the national road network and requests consultation in relation to proposals with the potential to impact on the efficiency and safety of the N13, national road. Cognisance should also be had of the TEN-T Corridor Needs Study.</p> <p><u>2. Strategic Economic Development Opportunity Site (SEDOS) 1</u> Acknowledges the identification of the site. The associated text confirms that the Council are of the view that access proposals to the lands concerned are required to conform to the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads</p>	Yes See A3 map for Bridgend (Map 1) inserted at the end of this table.	<p>1. Noted and agreed. The project will be developed by means of a robust consultation process with key stakeholders, including the TII at both route selection and planning permission stages.</p> <p>Recommendation: No Change</p> <p>2. Noted. The 'evidence base' referred to by the TII is already referenced in the Draft LAP (Section 7.5.1, last para. refers). The compilation of the evidence base was ongoing at the time of drafting this report. Further updates will be provided to Members at the Inishowen MD workshop and at the Plenary Council meeting of 26th March, 2018.</p> <p>Recommendation: No Change</p> <p>3. Noted and agreed. The project will be developed by means of a robust consultation process with key stakeholders, including the TII.</p> <p>Recommendation: No Change</p>

Ref.	Organisation/ Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Guidelines. In that regard, TII acknowledges consultation that has taken place to date and confirms availability to further discuss proposals with DCC. TII will review the appropriate evidence base prepared by the Council, when available.</p> <p>TII considers it premature to facilitate planning applications on the subject lands pending the outcome of such an approach. Any agreed access strategy should be incorporated into the Local Area Plan.</p> <p><u>3. Derry – Bunrana Greenway</u> Acknowledges the inclusion of Objective BE-TR-1 to secure the delivery of the Derry – Bunrana Greenway and associated text outlined in Section 7.10.1 which details the relationship of the proposed greenway route with the N13, national road. Recommends that such an objective should be developed complementary to the strategic function of the national road network and subject to consultation with and the agreement of TII.</p>		
PB6	Irish Water	1. Water Services - Irish Water is aware that Donegal County Council has secured funding for the taking in charge of three estates in Bridgend. Donegal County Council should	No	1. Noted. The Taking-In-Charge Team in the Planning Division have commenced consultations and these consultations are ongoing in accordance with established procedures.

Ref.	Organisation/ Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>contact Irish Water to discuss requirements for connection of these estates.</p> <p>2. Wastewater Services - features in Irish Water's Investment Plan 2017-21. The scope of the project is providing adequate wastewater treatment infrastructure and Irish Water is also looking at a number of options for treatment in relation to merging treatment facilities between Bridgend and its neighbouring village, Burnfoot. We expect a feasibility study to be completed later in the year which will assess options and make further recommendations.</p>		<p>Recommendation: No change</p> <p>2. Noted. This position is as per that set out in the Draft LAP (Section 7.8.1 refers).</p> <p>Recommendation: No Change</p>
PB7	Derry City & Strabane District Council	<p>Notes a particular interest in Bridgend due to the shared strategic location. Notes inter-Authority discussions on, and satisfaction with proposals in respect of the juxtaposition of the proposed SEDOS site in relation to the Derry settlement limit and the Industry zoning at Elagh Business Park, as well as the compatibility of roads proposals, the Greenway, and the aesthetic appearance of this key gateway from Bridgend through to Bunrana Rd/Skeoge Roundabout. Notes that such commitment will be for the betterment of both Districts and the wider North-West region.</p>	No	<p>Noted. As acknowledged in the submission, the ongoing consultations between both authorities on matters of mutual interest are a good example of the broad North-West City Region strategic approach delivering practical, 'on-the-ground' co-operation at a project level that will be for the betterment of both districts.</p> <p>Recommendation: No Change</p>

7 CARNDONAGH SUBMISSIONS

7.1 Overview

A total of 23 submissions were received from members of the public in relation to Carndonagh. One submission relating specifically to Carndonagh was received from a prescribed body, namely the Department of Culture, Heritage and the Gaeltacht.

7.1.1 Public Submissions

Of the 23 submissions received in relation to Carndonagh, 9 related directly to site-specific zoning requests, inclusive of requests for lands to be zoned for housing and/or economic development purposes. Two submissions related to the development of the Barrack Hill lands. One submission advocates community based 'renewable energy generating projects' using existing technologies whilst another envisages Carndonagh becoming the 'Green Hub' of Inishowen. A number of submissions raise concerns in relation to traffic management in the town.

7.1.2 Prescribed Bodies

The Department of Culture, Heritage and the Gaeltacht has lodged a submission dealing specifically with proposed Opportunity Site 3. A summary of the submission, together with the response of the Chief Executive and recommendations arising, can be found under Table 7.1, submission Ref. PB5.

7.2 Other Issues Arising

7.2.1 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of consulting engineers to prepare a Stage 2 Strategic Flood Risk Assessment in respect of the seven towns covered by the Local Area Plan. Following completion of this report, additional areas of potential flood risk have been identified and accordingly the zoning and/or policy requirements relating to 4 sites (namely PR4; PR8 and the adjoining Strategic Residential Reserve lands; Opportunity Site 6 and Opportunity Site 7) will have to be amended to ensure compliance with the principles outlined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities'. Specifically, the SFRA report identified small additional areas of potential pluvial flooding along (a.) the western boundary of site PR4, (b.) the western boundary of Opportunity Site 6 and (c.) the northern boundary of Opportunity Site 7. In light of this information, it is recommended that these relatively small parcels of land be rezoned from their current zoning to 'Recreation and Amenity'.

With regard to site PR8 and the immediately adjoining Strategic Residential Reserve (SRR) lands, the SFRA report noted that these lands could potentially be affected by pluvial (overland) flooding and recommended that any development on these lands be subject to the completion of a suitable site specific flood risk assessment. Accordingly, a policy to this effect has been drafted and is included for consideration below.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA1' contained at the end of this section of the report, such that lands within 'Primarily Residential' site PR4 are rezoned to 'Recreation and Amenity'.

This is a Material Alteration – Ref. CNMA1.

2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA2' contained at the end of this section of the report, such that lands within 'Opportunity Site 6' are rezoned to 'Recreation and Amenity'.

This is a Material Alteration – Ref. CNMA2.

3. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA3' contained at the end of this section of the report, such that lands within 'Opportunity Site 7' are rezoned to 'Recreation and Amenity'.

This is a Material Alteration – Ref. CNMA3.

4. Insert a new Policy CN-H-1 into section 8.7.4 that reads as follows (new text in blue):

Policy CN-H-1: "It is a policy of the Council to require that all proposals for development on 'Primarily Residential' Site PR8 or on the adjoining 'Strategic Residential Reserve' (SRR) lands be accompanied by a site specific flood risk assessment, prepared in accordance with the 'Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) or any subsequent iteration of said guidelines."

This is a Material Alteration – Ref. CNMA4.

5. Make consequential amendments to the text of the Draft Plan as follows (in order to reflect the supply of lands zoned for housing):

(i.) To amend chapter 8, section 8.7.2, Table 8.1 (page 111) and section 8.7.4 so that they read as set out in the text at the end of this section of the report.

This is a Material Alteration – Ref. CNMA5.

5. Make consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):

(i) Amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;

(ii) Amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.

This is a Material Alteration – Ref. GENMA1.

Table 7.1: Carndonagh Submissions

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
CN1	Derek and Roisin McLaughlin	1. Seeking extension of the LAP boundary to allow land and private dwelling to be considered for development and future provision of services for Carndonagh. Note that previous planning permission (08/70403) granted on these lands.	Yes See separate folded map for Carndonagh (Map 5)	<p>1. Noted. However, the LAP must be consistent with the County Donegal Development Plan, and the Core Strategy provisions therein. The Core Strategy of the Draft County Development Plan, 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including Carndonagh, whilst also facilitating appropriately-scaled expansion(s) where such strategic growth decisions are warranted. The Core Strategy housing requirement for Carndonagh has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Carndonagh and b) are more appropriately located in terms of the sequential growth of the town than the subject proposal.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
CN2	Patsy Doherty	<p>1. This submission confirms support for rezoning of his land as OPP6.</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>1. The contents of this submission are noted. However, on foot of a recent Stage 2 Strategic Flood Risk Assessment, the western fringe of Opportunity 6 site has been identified as being in Flood zone A; i.e. where the probability of flooding from rivers and the sea is greater than 1% (or 1 in 100) for river flooding or 0.5% (or 1 in 200) for coastal flooding. Having applied the sequential approach principles for flood risk management and to ensure compliance with the Department of Environment, Heritage and Local Government 'Planning System and Flood Risk Management Guidelines for Planning Authorities, it is considered that this portion of land should be rezoned as 'Recreation and Amenity'.</p> <p>Recommendation: Refer to recommendations outlined in Section 7.2.1 above, entitled Stage 2 Strategic Flood Risk Assessment.</p>
CN3	Morgan McCandless	<p>1. Confirms support for the inclusion of their lands within the LAP boundary, and for the proposed zonings for these lands i.e. Primarily Residential (PR7) and Opportunity Site (OPP1). Lists some 20 no. specific 'merits' of the subject lands:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the site is benefitted by a functional shape, well defined boundaries and a level topography throughout; <input type="checkbox"/> the site is readily accessible from Malin Road with an at grade and safe vehicular access point that is also benefitted by good vision lines; <input type="checkbox"/> the site does not appear to be burdened by any access constraints so it would seem that 	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>1-3. The contents of this submission have been noted. The Planning Department has undertaken an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. The lands subject of this submission are ideally located in close proximity to the town centre and offer an opportunity to provide sustainable housing development within easy reach of local amenities and services.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>the existing access point could be relocated along the site's frontage to Malin Road to suit a future development;</p> <p><input type="checkbox"/>the site will be easily accessible for waste collection;</p> <p><input type="checkbox"/>the site has access to important infrastructure (electricity, sewer and water);</p> <p><input type="checkbox"/>the site is located in close proximity to the town centre (3 minute walk to town centre boundary) and its key services (4 minute walk to Supervalu, adjoining retail units, PSC and the library, and a 5 minute walk to the various services located around the Diamond);</p> <p><input type="checkbox"/>the site is located in close proximity to Carn Football Club (2 minute walk)</p> <p><input type="checkbox"/>from a sequential perspective, the subject site is the second best located residential site after PR6 in terms of its walking relationship to the town centre boundary;</p> <p><input type="checkbox"/>the site is benefitted by a well dimensioned footpath along its western boundary and which continues to the town centre;</p> <p><input type="checkbox"/>the greenfield nature of the site means that it is readily developable and that the risk of ground contamination is minimal;</p> <p><input type="checkbox"/>the site represents a natural infill along Malin Road;</p>		

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p><input type="checkbox"/> Residential development within the 'PR7' zoned section of the site will help to ensure that the site will be developed with uses that are compatible with the immediately adjoining residential dwellings so as to reduce the potential for adverse amenity impacts;</p> <p><input type="checkbox"/> The site can help to unlock the development potential of the remaining area of 'Opp 1' by opening up the land and providing a means of access from Malin Road to its northern portion;</p> <p><input type="checkbox"/> The site's level topography reduces the potential for any negative visual impacts on views or landscapes as well as the potential for overlooking and overshadowing of neighbouring properties;</p> <p><input type="checkbox"/> The site is held by a single interest party which can ensure its availability and deliverability;</p> <p><input type="checkbox"/> The site is not burdened by any heritage designations;</p> <p><input type="checkbox"/> The site is not burdened by any environmental designations;</p> <p><input type="checkbox"/> The site is not burdened by any flooding issues;</p> <p><input type="checkbox"/> The site is not burdened by any special views to/from the site; and</p>		

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p><input type="checkbox"/>The site is not burdened by any physical structures or constraints within the site.</p> <p><input type="checkbox"/>Note that they are willing to deliver a development in the short-term.</p> <p>2. Welcomes the positive vision in the LAP for Carndonagh and the strategic role of the town and suggests that it is critical that 'deliverable housing land' is available to cater for this evolving role and the growing population of the Carndonagh.</p> <p>3. Considers that for residential development proposals, a form of flexibility should be incorporated into the Plan with due regard and weight being given to the relative merits of any given site including issues such as viability and housing need. This would provide prospective developers with the incentive needed to persuade them to invest in areas like Carndonagh, so as to deliver the housing numbers required.</p>		
CN4	Paul Donaghy	<p>1. Supports 'mother's submission' to amend the LAP to include her land that was zoned in the town boundary for residential in earlier plans. Notes that lands had outline planning permission for multiple development before; refers to sale of land 'for the bypass' and that residential zoning was part of such considerations; and that lands are close to the Gaelic pitch and the proposed new soccer pitch recently purchased.</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>1. Refer to response in relation to submission Ref. CN7.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
CN5	Siobhan Shiels	Envisages Carn becoming a green hub of Inishowen; providing sites for repair café's, DIY share and zero waste initiatives. A space which encompasses environmental initiatives, promotes greener and more sustainable lifestyles which can echo back into the community. Creating links with groups already in existence.. ..A space where we could develop green businesses - like zero waste shops, zero waste cafes...community run not for profit space where we can all learn, develop and instigate conscious ways for us to live and be in our community.	No	<p>The contents of this submission are noted. The submission contains a range of positive proposals, all of which would enhance the overall town experience. Notwithstanding, several of the suggested items are beyond the remit of the LAP including the zero waste cafes and zero waste shop. In respect of those issues, the objectives and policies of the LAP seek to provide an appropriate planning policy context that would allow for positive consideration of such proposals if they were forthcoming and the LAP does not preclude the advancement of the provision and/or improvement of these facilities.</p> <p>Recommendation: No change.</p>
CN6	Liam Donaghy	Supports 'mother's submission' to amend the LAP to include her land that was zoned in the town boundary for residential in earlier plans. Notes that lands had outline planning permission for multiple development before; refers to sale of land 'for the bypass' and that residential zoning was part of such considerations; and that lands are close to the Gaelic pitch and the proposed new soccer pitch recently purchased.	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	Refer to response in relation to submission ref. CN7.
CN7	Shane Donaghy	Submission refers to lands at Tulnaree on the eastern side of the town and requests that a significant area of ground, most of which is currently located outside of the town boundary, be included within the boundary. The lands in question are mainly to the north and east of the small area zoned in the Draft Plan for economic development at Tulnaree,	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>1. The contents of this submission have been noted and considered. The lands in question are rural in character and are located on the eastern periphery of the town. Whilst the presence of existing commercial developments to the west of the subject lands is acknowledged, it is nonetheless considered that an expansion of 'economic development' uses at this location may have serious implications for the development and regeneration of the town centre. The Draft</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>together with another area to the south. The submission notes that this area (Simpson's site) has been 'one of the mainstays of the Town and (in) existence long before many of the recent expansions'. The submission contends that whilst the LAP acknowledges the existing commercial development, it is not supportive of future growth in this localised area and suggests that there is a greater need to zone lands at this location as it is located on an arterial route to the town and meets the policies laid out in the Draft LAP in addition to supporting the CDP.</p> <p>The submission contends that there should be greater scope for future developers to expand the town and have more opportunity sites. It is contended that infrastructure is already in place in this part of the town and that the rural area to the east of the town has a significant population that tend to avail of the existing retail site. It is therefore suggested that this area of town is much more capable of accommodating future growth than the proposed opportunity sites; being more sustainable and making more economic sense with much less resources required for providing and upgrading the infrastructure.</p> <p>The submission contends that the current Draft LAP proposal would stifle development in this location which already has all the services</p>		<p>LAP identifies numerous 'Opportunity Sites' for economic development closer to the town centre than the lands subject of this submission, and The uptake of these Opportunity Sites would serve to consolidate the commercial core of Carndonagh by following a sequential approach to development – i.e. developing from the centre out. In the absence of any further detail, it is considered that an extension of the town boundary at this location would be inappropriate and thus no changes are recommended to the boundary at this time.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>required to meet future growth.</p> <p>It is contended that the plan fails to recognise the existing built up nature of the area. The 'Henderson field' (not identified on maps accompanying the submission) is stated to be merely an infill site with an existing line of housing development either side of its boundary. The submission notes that Section 8.7.1 of the housing policy indicates the LAP will support Infill sites and contends that this proposed amendment would only be in support the strategies and policies of the plan.</p> <p>It is contended that there is an opportunity for any proposed development to provide significant improvement to a poorly formed crossroads, i.e. the junction of the old Merville road, Craigtown road and the Hillhead road. Concerns are raised over the safety of pedestrian and cars using this junction and it is contended that future housing/development on this site may offer the opportunity to improve the junction. It is contended that the subject lands are located in an area of 'infill' and are more sustainable than many of the proposed sites outlined in the draft plan given the links to local services.</p> <p>In terms of the land on left of the R244 exiting the town, the submission contends that there is an existing line of development which extends much further than the proposed boundary. The submission states that this</p>		

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>should be taken into consideration, in addition to the recreational use of the show field and the location of the GAA pitches and future Carndonagh FC pitch. The submission suggests that the town needs to develop more in this direction and provide services such as footpaths to extend in this route. It is contended that the nature of the road serving the lands already caters for future development and this was part of the agreement when the new road was constructed. It is contended that the footpath on either side of the road clearly indicates that the natural town limit is beyond the cross roads of the old and new link road.</p> <p>It is contended that consideration must be given to the existing GAA pitch, which is likely to intensify in terms of use. The submission states that many of the town's residents have expected that as a minimum it would be served by at least a single footpath to the site with lighting. It is contended that any proposals to further develop this location would only support further development of townlands in this direction. The submission contends that the GAA pitch is at present an isolated development and doesn't fit with the current LAP.</p> <p>Whilst the plan has a strategy to provide a new link road to serve Opportunity site 5, it is contended that this is an extremely costly site to develop given the infrastructure required</p>		

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>whereas the infrastructure is already present to the east of the town.</p> <p>The submission is supported by a map identifying the lands proposed for inclusion in the settlement boundary to 'rebalance the proposed expansion of the town'.</p> <p>Concludes by noting that whilst the proposed amendment seeks to extend the boundary by a limited amount, it could be argued that it should be increased significantly in this direction as the long linear stretches of development along the main roads are not supported by any mixed use development whereas this area of the town offers an existing core which should be (given) much more weight when considering future sustainable growth.</p> <p>2. Doubts the merits of zoning Site Opp4 for residential and economic development/hotel due in part to proximity to the Agricultural Co-Op.</p>		<p>2. With regard to the zoning of Opportunity Site 4, this site comprises a significant area (circa 4.7Ha) and is capable of accommodating a variety of uses including residential, commercial and tourism use. The site is served by pedestrian footpath along the Regional road and is located in close proximity to the town centre. The presence of the co-op to the east of the site is acknowledged, but it is not considered that the presence of that development would in any way hinder the appropriate development of Opportunity Site 4.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Mapped Yes/No	Response and Recommendations Arising
		<p>3. Re Opportunity Site 1, questions consideration given to flooding, particularly the failure of the LAP to reference recent experiences of flooding in the town. Concerned that any engineering solution could impact on the existing Simpsons site (which has experienced numerous flooding incidents). Urges a rethink re this and suggests may be more appropriate for soft development of recreational open space.</p>		<p>3. With regard to potential flood risk within the plan area, the Council engaged a firm of consulting engineers to carry out a Stage 2 Strategic Flood Risk Assessment and as a result of this report certain changes to land-use zonings are recommended herein. No issues arose however, with respect to the zoning of Opportunity Site 1. Having regard to the consultants findings, no changes are recommended in this respect.</p> <p>Recommendation: No change.</p>
CN8	Thornhill Developments	<p>The parties on whose behalf this submission has been made have recently purchased the subject lands, with the intention of completing development previously granted under 07/70571. The submission notes the location of the site to the rear of established developments of Woodland, Churchland Quarters and currently just outside of settlement envelope. The submission contends that the area is characterised by housing estates and that the site is serviced, excavated and road make up in place as part of overall Woodlands development. Ready for development should planning permission be granted. Notes that current zoning of site as within a 'Stronger Rural Area' in the Draft County Development Plan, 2018-2024 would leave the site being only for one-off dwellings. Considers zoning to be unreasonable for two reasons: 1. Lands are already serviced and ready for development to complete the overall development of Woodland housing</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>Noted. However, the LAP must be consistent with the County Donegal Development Plan, and the Core Strategy provisions therein. The Core Strategy of the Draft County Development Plan, 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including Carndonagh, whilst also facilitating appropriately-scaled expansion(s) where such strategic growth decisions are warranted. The Core Strategy housing requirement for Carndonagh has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Carndonagh and b) are more appropriately located in terms of</p>

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		development; and 2. land has a positive planning history for 20 no. residential units under planning permission ref. no. 07/70571 - not constructed due to the economic downturn. Requests that lands are zoned as Primary Residential. This would be minor as it is merely stretching the existing boundary and not requesting a massive inclusion of lands.		the sequential growth of the town than the subject proposal. Recommendation: No change.
CN9	Joe Doherty	Seeking rezoning of site from 'Local Environment' to 'Primary Residential'. The submission contends that – a. The site is serviced with public water and wastewater since 2003, b. site had benefit of planning permission which did not proceed due to economic downturn, c. area is substantially developed with 14 no. units already completed and would be compatible with, and ensure consolidation of, adjoining land uses, e. site presents no issues in terms of flooding, f. has good road links as it is adjacent to the public road, g. pedestrian access to town centre is roughly a five minute walk. It is contended that the site addresses all the issues identified at Section 3.5 of the LAP.	Yes See separate folded map for Carndonagh (Map 5)	Noted. However, the LAP must be consistent with the County Donegal Development Plan, and the Core Strategy provisions therein. The Core Strategy of the Draft County Development Plan, 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including Carndonagh, whilst also facilitating appropriately-scaled expansion(s) where such strategic growth decisions are warranted. The Core Strategy housing requirement for Carndonagh has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Carndonagh and b) are more appropriately located in terms of the sequential growth of the town than the subject proposal.

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				Recommendation: No change.
CN10	Peter Doherty	<p>1. Relates to proposal to create 'The Ballywilly Brook Forest Park' and the 'Inishowen Celtic Heritage Trail' at Barrack Hill site. Intention is to develop an area of roughly 20 acres adjacent to the current Barrack Hill Town park and create a park amenity that will provide the facility for extensive walking opportunities in the natural environment that is currently unavailable in Carn. Will also include a heritage trail that celebrates the wealth of prehistoric heritage that is bountiful within the Inishowen peninsula. Notes that the concept was developed as a postgraduate thesis at Boston University. Notes the extent of the park, that it is surrounded primarily by residential areas, that the access to the town centre from these areas takes a circuitous route along busy roads and that the development of the park will create a nature corridor from the town centre to surrounding areas. Will also create increased access to outlying areas that are hampered in their availability for residential development because of this inaccessibility. The plan incorporates a transport access through the development that has been part of the DCC's transport strategy for Carn for some time. The</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>Noted. The submission proposes a single use for the Barrack Hill site, namely its use as a wooded town park incorporating a network of walking routes and references to local history.</p> <p>Whilst the proposed use of the site would undoubtedly be a major asset for the town, the proposal must be considered against the alternative development potential of the site. This development potential was previously recognised by the Council in the Master plan document proposal prepared by Canavan Associates in 2003.</p> <p>That master plan identified alternative uses for the site, including private and social housing, a neighbourhood centre, community and school facilities, amenity and open space areas and workspace units, and also identified a road layout that would provide access to additional large strategic areas of land immediately to the North & South of the Barrack Hill site.</p> <p>The general thrust of the master plan was replicated in the relevant sections of the Draft LAP, wherein the potential uses identified include a mixed use of residential, community uses and light industrial, commercial, but excluding retail.</p> <p>A further important and relevant point to note is the identification in the Draft LAP of the lower part of the site adjacent to and parallel with the Ballywilly Brook as being within flood zone A and B in the OPW'S Draft CFRAMS flood mapping. As a consequence, it is likely that a development would not in any event extend across this part of the site in accordance with the principles of the 'Planning System and Flood Risk Management Guidelines for Planning Authorities'. This part of</p>

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		<p>submission then goes on to discuss several beneficial aspects of the Plan including: Biodiversity-Proposed park will be completely indigenous and represents a unique opportunity to address issue of endangered flora and fauna. Notes deficits in forestry coverage in Ireland relative to other EU states. Education-Proposal includes information points relating to each species highlighting and informing of their historical, mythological, environmental and spiritual significance. Will provide an opportunity for children and adults to immerse themselves in nature in a safe and welcoming environment. Health and Leisure-Pathways will be reasonably low level, unlike the paths running through the current Barrack Hill Town park which have a prohibitively steep gradient. Proposed surfaces would make them safe for various activities including walking, cycling etc. Notes absence of family-friendly walking routes in Carn, that the most popular route in Carn is the busy bypass, and that families are forced to drive to surrounding towns that do have such facilities. Tourism-Notes the significance of forests for tourism in Ireland and notes also the importance and potential of the Wild Atlantic Way and that the theme of the park (an indigenous and unmanicured area where Irish nature can be left to display its beauty while remaining comfortably accessible) should</p>		<p>the site would thus be preserved as a green/amenity space.</p> <p>Having regard to the longstanding policy of the Council to develop the site, to the significant benefits for the town that could arise from said development and to the likelihood that a significant part of the lower portion of the site parallel to the Ballywilly Brook will be suitable only for green/amenity uses in any event, it is considered that on balance the uses and planning approach as proposed in the Draft LAP shall be retained.</p> <p>Finally, it should also be noted that the master plan project would include a meaningful public consultation exercise with all relevant stakeholders.</p> <p>Recommendation: No change.</p>

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		<p>prove to be an attraction to the overseas visitor. Notes that the proposal reflects many of the guidelines and objectives in the LAP including the Strategic Vision, Economic Development objectives, Zoning objectives, and specific objectives and policies for Barrack Hill including Objective CN-OPP-1, Policy CN-MP-1 and Policy CN-MP-4. Submission then provides detail on the proposed 'Inishowen Celtic Heritage Trail' in the context of the extent of the cultural and heritage tourism sector in Ireland generally. Notes that aim of project is to create a touristic potential in Carn that reflects the significant relationship that the town and the greater Inishowen area has with the culture and heritage of Ireland. Notes the importance of the Carndonagh Cross on the edge of town but also that it does not encourage tourists to come into the town. The proposed attraction would do so and complement the Cross. Proposed that the trail will incorporate representations of the most outstanding archaeological artefacts throughout the peninsula in the form of standing stones that will feature an element of the original. Notes the potential of the reported visits to the area by St. Patrick and St. Colmcille. Notes further context of plans to develop a visitor trail around the town that explores the built heritage of the town as well as the cross and the mass rock. The trail is</p>		

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		<p>designed to complement these and many other features in the town. Also seeking to create a number of other thematic links other attractions in Inishowen including Grianan of Aileach and the IOSAS centre. Proposal will encourage more investment in the hospitality infrastructure of the town. Goes on to detail the various proposed art works in the park, proposed funding and future maintenance. The submission includes a very detailed Master Plan that goes into all of the above-noted issues in much greater detail together with a large no. of sketch illustrations and photographs.</p>		
CN11	Noreen Donaghy	<p>Please refer to summary of submission CN7, which contains all of the points contained in submission CN11 and has elaborated on same.</p>	<p>Yes See separate folded map for Carndonagh (Map 5)</p>	<p>Refer to response in relation to submission CN7, which has effectively copied and thereafter elaborated on the contents of submission CN11.</p>
CN12	Cllr. Albert Doherty	<p>Council must and ought to respond to significant developments at Tulnaree, Foden, Hillhead and Carrickafoden areas of Carn. Carn GAA, Inishowen GAA, Inishowen Agricultural Committee, Inishowen Co-Operative Society Ltd. and Carndonagh Soccer Field Trust have invested, envisioned and delivered sporting et al facilities in this area. The town boundary on the north and eastern side in the LAP ought to be extended to facilitate and allow proposed and present development in 2018-2024 period.</p>	<p>No</p>	<p>Noted. See response to submission CN7 above.</p>

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CN13	Cllr. Albert Doherty	<p>Submission re significant building previously Tillie and Henderson/Montay. Has traditionally provided significant employment opportunities for Inishowen. The building's significant frontage on Bridge St and back buildings on Station Rd. can again sustain and deliver and support development in Carn. Presently, Station Rd. (western location) provides employment opportunities at the Public Service centre, Ashley Martin, Atlanfish. Services are also located there including the Fire Service, recycling service. Some nearby sites remain landlocked with no outlet onto Station rd. Unlikely that significant additional residential streetscape will result on the remains of the Road. Present ongoing activity at the road serves both as a mainstay for future investment and as a deterrent and safeguard against dereliction and unwanted vandalism to/in empty buildings. The site has a role to play.</p>	No	<p>The contents of this submission are noted. The Bridge St. and Station Road areas are located within the defined town centre of Carndonagh and as such the policies and objectives of the LAP will support appropriate development at these locations.</p> <p>Recommendation: No change</p>
CN14	Shaun Bradley	<p>Proposes community based "Renewable Energy Generating Projects" using existing technologies to further educate the community that "Carbon Reduction" and energy use are intrinsically linked. Wants to show how waste management can be a positive process if considered as a Waste To Energy Process. Would also like to promote the upgrade/retrofit of properties with renewable technologies and encourage development of larger commercial</p>	No	<p>The contents of this submission are noted. The submission contains a range of positive proposals, all of which could enhance the overall town experience. Notwithstanding, several of the suggested items are beyond the remit of the LAP including the community based 'Renewable Energy Generating Projects'. In respect of those issues, the objectives and policies of the LAP seek to provide an appropriate planning policy context that would allow for positive consideration of such proposals if they were forthcoming and the LAP does not preclude the advancement of the provision and/or improvement</p>

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		<p>scale installations.</p> <p>Submission states that Ireland exports approximately 85% of agricultural produce and notes that there is a significant failure to promote the utilisation of this sector for renewable energy generation (states that our European counterparts have shown this to be successful) while it could deliver stability and sustainability to uncertain farming sectors.</p> <p>Contends that these processes, if implemented on a holistic level, involving local communities, local businesses and local agri-producers, can deliver amazing results, not just on carbon reduction but also on renewable energy generation and can bring the amount of bio-degradable waste produced by communities, the local business sector and the local agri-sector and sent to landfill down to 0%.</p> <p>Submission contends that, if there were successful development of the above suggestions, this "Green Energy" could be used to further develop other sectors and attract much needed employment e.g. Recycling of locally generated plastic waste, made into Benches, Chairs, Bird Tables etc.</p> <p>Submission contends that, if commercial scale generation of renewable energy could be achieved, the temperate climate of north west Donegal is more attractive to Global Scale Corporations requiring "Data Storage Centres" than Cork for example where the annual</p>		<p>of these facilities.</p> <p>Recommendation: No change.</p>

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		<p>temperature average is almost 3 degrees above Donegal. Submission contends that the cost benefit of this is significant in the amount of reduced energy requirements.</p> <p>The writer would like to establish an information centre in Carndonagh to promote the importance of Carbon Reduction to local businesses, farmers and the local community, where they can access advice and financial models on renewable energy generating technologies and waste management. Envisages this centre to be a "hub" where promoting "Green Inishowen" could be born and could be an example of how a carbon neutral community based working economy can be prosperous for all.</p>		
CN15	Teresa McConalogue	<p>1. Proposes that Chapel Street, New road and Bridge Street become a one way system as traffic on these streets is horrendous and a nightmare the way cars park on these roads.</p> <p>2. Also proposes that some traffic control measure be introduced on the Malin Road from the roundabout to the town centre as cars parked on right hand side of street causing serious hazard to cars entering town and cars coming down Malin street not giving way to traffic trying to drive up Malin street.</p>	No	<p>1 and 2. The contents of this submission are noted and concerns regarding traffic safety/traffic movements in Carndonagh are acknowledged. In general terms, it is considered that the detailed processes and procedures for the creation of one-way systems and the introduction of traffic control measures are outside the scope of the LAP and should in the first instance be addressed via the Area Roads Office.</p> <p>Recommendation: No change.</p>
CN16	Yvonne McConalogue Lee	<p>1. Proposes that Chapel Street, New road and onto Bridge Street becomes a one way street with traffic going down Chapel Street. Cars</p>	No	<p>1 and 2. The contents of this submission are noted and concerns regarding traffic safety/traffic movements in Carndonagh are noted. In general terms, it is considered that the detailed</p>

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		<p>parked on these streets are causing hazardous conditions for all drivers concerned and only a one way system may resolve this. Carn town is a nightmare to drive in and something needs to be done.</p> <p>2. Also Malin road from roundabout to Carn town is a nightmare and that pole on the left below Annie Divers is a hazard and no left hand mirrors left after meeting numerous cars not obeying rules of the road giving way to traffic coming up.</p>		<p>processes and procedures for the creation of one-way systems and the introduction of traffic control measures are outside the scope of the LAP and should in the first instance be addressed via the Area Roads Office.</p> <p>Recommendation: No change.</p>
CN17	Richard Lee	<p>1. Can something be done with the traffic problems in Carn town. The roundabout at Supervalu is dangerous especially from traffic coming from Malin direction full steam ahead and only people on the road. Come up Malin Street and it's a free for all who can get up without losing a wing mirror on that pole on us left or us car with all oncoming traffic assuming they have right of way and plough on down past parked cars on their side of the road. Can something be done with Chapel Street as it's a nightmare. No parking should be allowed on this street or make it one way only please. I hope my submission will be considered or at least looked at.</p> <p>2. Can we also have public toilets please.</p>	No	<p>1. The contents of this submission are noted and concerns regarding traffic safety/traffic movements in Carndonagh are noted. In general terms, it is considered that the detailed processes and procedures for the introduction of traffic control measures are outside the scope of the LAP and should in the first instance be addressed via the Area Roads Office.</p> <p>Recommendation: No change.</p> <p>2. Comments regarding the need for public toilets are noted. The LAP would be supportive of the provision of appropriately located and maintained public conveniences.</p> <p>Recommendation: No change.</p>

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CN18	Jim Harley on behalf of GDC Ireland Ltd.	<p>Submission made in respect of lands in their ownership at Quigley's Point Rd identified on Draft LAP Map as PR4. Refer to zoning of part of their lands for 'Recreational Amenity' and whilst acknowledging that it is essential to zone lands for such, consider that better opportunities for such uses exist within the town and cite lands at Barrack Hill, along the Moss Road and the Gort Road which are also zoned Recreational Amenity and are in more advantageous strategic locations to provide space for both active and passive recreational uses. The Glentogher River offers limited recreational opportunities. This could be provided by the provision of a tow path along both banks of the river to facilitate walking and/or seating. The amount of ground needed for this would be no more than 4m wide. The extent of Recreational Amenity land identified does not seem reasonable. Recreational open space would be provided in association with residential development of the lands zoned PR4 to meet the needs of future residents. Accordingly, requested that the Recreational Amenity zoning of the subject lands be amended to facilitate a riverside walk.</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>The contents of this submission have been noted and considered. The land zoned 'Recreational Amenity' (note: this is a typo – the map legend should read 'Recreation and Amenity') on the western side of PR4 were designated as such due to the identification of a potential flood risk on these lands as part of the CFRAMS study. Since issuing the Draft LAP for consultation, the Council has engaged engineering consultants to carry out a Stage 2 Strategic Flood Risk Assessment (SFRA) report in respect of the seven towns subject of the LAP, and it transpires that a small additional area on the western side of site PR4 is potentially at risk of flooding (see Flood Risk maps provided in Stage 2 SFRA report). Applying the sequential approach principles for flood risk management therefore, and to ensure compliance with the Department of Environment, Heritage and Local Government 'Planning System and Flood Risk Management Guidelines for Planning Authorities, it is considered that the additional area of flood risk land identified in the SFRA report should be rezoned as 'Recreation and Amenity'.</p> <p>Recommendation: Refer to recommendations in Section 7.2.1 above, entitled Stage 2 Strategic Flood Risk Assessment.</p>
CN19	Cllr. Albert Doherty	<p>1. Submission refers to Barrack Hill Masterplan site. Proposes that the Council promotes an overall plan, considers development of tennis, athletics, basketball facilities in an overall plan. Submission notes that established and</p>	<p>Yes</p> <p>See separate folded map for Carndonagh</p>	<p>1. Noted –refer to response to submission ref. CN10 above.</p>

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		<p>interested Inishowen environmental groups, Carndonagh Development, Tidy Town Committee, Heritage group, Carndonagh Community gardens, People of Carn. et al must be consulted and invited to participate in all proposed plans for the site.</p> <p>The submission notes that the Council and interested groups should engage and familiarise themselves with the contents in " Ballywilly Brook Forest Park", a master plan thesis which envisaged a heritage and tree trail on site.</p> <p>Submission notes that relevant flood relief works must likewise be prioritised and flood threat addressed.</p> <p>2. Carrickafodan and Hillhead area.</p> <p>Submission states that extension has been limited here and notes that Council acknowledgement and response is required to sporting developments established and proposed for this area, including facilitating a footpath and road measures for the annual Inishowen Agricultural Show.</p> <p>3. Ballyloskey Rd extension agreed at Workshop.</p>	(Map 5)	<p>2. Noted –refer to response to submission ref. CN7 above.</p> <p>Recommendation: No change.</p> <p>3. Noted. In the absence of any details with the submission, it is not possible to comment any further.</p> <p>Recommendation: No change.</p>
CN20	Michael Doherty	Submission made in respect of lands in their ownership adjacent to Shopping Centre. Refer to zoning of their lands for 'Recreational	Yes See separate	Noted. However, the LAP must be consistent with the County Donegal Development Plan, and the Core Strategy provisions therein. The Core Strategy of the Draft County Development

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		<p>Amenity' and whilst acknowledging that it is essential to zone lands for such, consider that better opportunities for such uses existing within the town and cite lands at Barrack Hill, along the Moss Road and the Gort Road which are also zoned Recreational Amenity are in more advantageous strategic locations to provide space for both active and passive recreational uses. The Carndonagh River offers limited recreational opportunities. This could be provided by the provision of a tow path along both banks of the river to facilitate walking and/or seating. The amount of ground needed for this would be no more than 4m wide. The extent of Recreational Amenity land identified does not seem reasonable and will hinder plans for future development. Accordingly, request that the Recreational Amenity zoning of the subject lands be amended to facilitate a riverside walk.</p>	folded map for Carndonagh (Map 5)	<p>Plan, 2018-2024 identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including Carndonagh, whilst also facilitating appropriately-scaled expansion(s) where such strategic growth decisions are warranted. The Core Strategy housing requirement for Carndonagh has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Carndonagh and b) are more appropriately located in terms of the sequential growth of the town than the subject proposal.</p> <p>Recommendation: No change.</p>
CN21	Seamus Doherty	<p>Submission is in relation to Opportunity Site 5 and notes that he is the owner. During the recent construction boom was granted planning for 2 detached houses at the north west end of the site. Due to the collapse in construction the sale fell through. At this time the planning office requested that he submit an outline plan for the whole site (OPP 5) (9 ha.) and this plan should show 22 units per</p>	<p>Yes</p> <p>See separate folded map for Carndonagh (Map 5)</p>	<p>The Core Strategy housing requirement for Carndonagh has been identified as being 21Ha of residential land and the Planning Department has undertaken an exercise to identify the most appropriate sites for new housing development in Carndonagh in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In order to provide an</p>

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		<p>hectare, services etc. A record of this letter should be on file in the Planning office. It is difficult to understand how now only 2.5 Hectares out of 9.3 hac. is only suitable for residential purposes. This site has dual vehicular access one to the east and the other to the west. The main sewer servicing Ard Colgan goes from the Moss Road in the west across the centre of the site to the east end and across the Donagh river at the recycling plant in the town (this is not shown on the map). Also the mains water servicing the Church Road goes up through the site from north along the bank of the river to the Church Road. The site is fully serviced with broadband (E-fibre), electricity at both the east and west boundary, water, sewage, public street lighting, footpath uninterrupted to the town centre. Flood free regardless of how bad the weather. It is only a few meters from the center of the town. It is also 400 meters from the shopping centre Church Road about 700 meters from the boys primary school, 800 meters from the Carndonagh Community school and there is talk about extending the river walk along the east boundary.</p> <p>Thinks that given all the points listed this site conforms most closely to the criteria for residential lands. Also thinks that these lands should be first developed within the core development area in preference to lands at the extremity of the town boundary zoned as</p>		<p>appropriate spread of potential housing sites across the town, the 21Ha 'Primarily Residential' allocation has been dispersed throughout the settlement. In general terms, it would not be prudent to zone the entirety of Opportunity Site 5 (approximately 9 Ha) as Primarily Residential, as this would constitute nearly half of the total allocation for the town and may result in the provision of new housing development being unduly dependent on a limited number of landowners. In terms of new housing within Opportunity Site 5 having to be on the southern side of the proposed relief road, it is considered that this would allow for ease of pedestrian movement toward the town centre and is thus entirely appropriate. Whilst suggestions in relation to a pedestrian bridge over the relief road are acknowledged, it is nonetheless considered that the relief road would act as a barrier to effective pedestrian movement and a bridge in itself would not serve to fully remove this barrier.</p> <p>Recommendation: No change.</p>

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		<p>residential and unserviced sites.</p> <p>With reference to OPP 5 site the proposal is to put all residential lands to the south of the proposed relief road; the reason given for this is to avoid pedestrians crossing the relief road on their way to town. If a bridge is in place pedestrian access will be to both sides of the road leading to the town centre. I would hope that you might possibly consider leaving it open and consider any application on its own merit whether it be north or south of the relief road.</p>		
CN22	Brian Breslin	1Would like to extend town boundary to include his lands at Ballyloskey.	No	<p>The contents of this submission have been noted. However, in the absence of a map or any indication of the position and extent of the lands in question, it is not possible to assess the suitability or otherwise of the lands for inclusion within the town boundary.</p> <p>Recommendation: No change</p>
PRESCRIBED BODIES				
PB5	Department of Culture, Heritage and the Gaeltacht	The Department submission recommends that prior to the zoning of the site identified as OPP3, the Council should undertake an Archaeological Impact Assessment of the proposed zoning given the potential impact on one of the main early ecclesiastical centres in Donegal (National Monument 271).	No	<p>These comments are noted. The description of Opportunity Site 3 as set out on page 105 of the Draft LAP is unequivocal in terms of acknowledging the potential archaeological importance of this site; noting that the subject lands are the original location of the Carndonagh High Cross and two flanking carved pillar stones. With this in mind, Policy CN-OPP-3 of the Draft Plan clearly provides that any development proposals on this site must be accompanied by a detailed archaeological assessment. In the event that findings of archaeological significance were</p>

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				<p>uncovered as a result of such an assessment, the Council would consult with the Department in order to determine the most appropriate course of action for the preservation and/or recording of findings. It is therefore considered that the policies in the Draft LAP are fully cognisant of the potential archaeological value of this site and indeed will require that an archaeological assessment is carried out prior to any development being permitted.</p> <p>Recommendation: No change.</p>

TEXT ASSOCIATED WITH REF. CNMA4 AND CNMA5 (NEW TEXT IN BLUE, DELETIONS IN STRIKETHROUGH)

To make consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing by amending chapter 8, section 8.7.2 page 110, section 8.7.4 and table 8.1, page 111 so that it reads as set out below:

8.7.2 Identification of Housing Lands

In order to identify the most appropriate sites for residential use, the Planning Authority undertook an analysis of available lands within the defined town boundary. The criteria used in the analysis included, inter alia, – An examination of potential flooding issues, ~~based on the Office of Public Works Catchment Flood Risk and Assessment (CFRAM) programme;~~ distance of lands from the town centre; compatibility with adjoining land uses; the presence of sites of conservation importance; accessibility and visual vulnerability. Further to this assessment the Planning Authority has identified the lands deemed most suitable for housing within the town and these lands (comprising ~~23.4~~ 20.72 hectares in total) are zoned either as 'Primarily Residential' or as an 'Opportunity Site' on the accompanying land use zoning Map 5. ~~The Council acknowledges the fact that the total area of potential housing lands marginally exceeds the 21 hectare requirement identified in the Core Strategy of the Draft County Development Plan 2018-2024; however, a monitoring approach will be implemented in order to ensure that there is no significant deviation from the objectives and targets of the Core Strategy.~~

In addition to lands suitable for 'first phase' housing development, the Planning Authority has identified lands that may be appropriate for housing development in the medium to long term, and these lands are zoned as 'Strategic Residential Reserve' on the land-use zoning map accompanying this Local Area Plan (Map 5). The Strategic Residential Reserve Lands are regarded as a long term landbank to cater for the future expansion of Carndonagh rather than a means to address current housing need within the town. Accordingly, proposals for the development of multiple housing (i.e. 2 or more dwellings) on lands zoned 'Strategic Residential Reserve' will not be considered during the lifetime of this Local Area Plan. The release of these lands for multiple housing will instead be considered during future reviews of the Local Area Plan and the situation will be reviewed and managed through a clear and transparent evidence-led approach that will involve, inter alia, an assessment of the uptake of land zoned 'Primarily Residential'.

Extract of Table 8.1 from the Draft LAP 2018-2024: Total Lands Identified to Meet Residential Housing Need in Carndonagh

Site Ref	Zoned as 'Primarily Residential' or 'Opportunity Site.'	Area of site (ha)	Potential number of housing units to be delivered
PR1	Primarily Residential	1.9	23
PR2	Primarily Residential	2.0	24
PR3	Primarily Residential	2.57	31
PR4	Primarily Residential	1.75	21
PR5	Primarily Residential	0.7	8
PR6	Primarily Residential	1.28	15
PR7	Primarily Residential	1.0	12
PR8	Primarily Residential	1.0	12
	Total 'Primarily Residential'	12.2	146
	Total 'Opportunity Site'	8.52 Ha	102

Total Hectareage of Lands Zoned for Residential Development in Carndonagh	
Lands Zoned Primarily Residential	13.39 Ha
Lands Zoned as Opportunity Site also allowing for Residential Development	8.71 Ha
Total Residential Lands	22.1 Ha

8.7.4 Housing Policies

Chapter 3 of this LAP sets out the general policies in relation to residential development on lands zoned as 'Primarily Residential', 'Established Development', 'Town Centre', 'Local Environment' or 'Strategic Residential Reserve'. However, in certain circumstances residential development will also be considered on identified Opportunity Sites in accordance with the specific policies set out under Section 8.6.4 and 8.6.5 of this LAP. ~~There are no site specific policies in relation to housing in Carndonagh.~~ 'Primarily Residential' Site PR8 and the adjoining Strategic Residential Reserve Lands have been identified as being at risk of pluvial flooding and accordingly a specific policy to address this potential risk is set out below.

Lands that are potentially subject to fluvial flood risk (as identified by the ~~OPW CFRAMS study in the Stage 2 Strategic Flood Risk Assessment Report~~) have not been zoned for residential purposes in this LAP. However, given that the extent of flooding can never be predicted with one hundred per cent accuracy, it will be a requirement that residential development proposals on lands that adjoin areas of potential flood risk must be designed using a precautionary approach taking account of potential flooding issues (e.g. by providing amenity areas adjacent to potential flood risk areas); refer to Policy CN-IS-5 in this regard together with the objectives and policies of the Draft CDP in relation to flooding (Chapter 3 and Appendix A of this LAP refer).

Policy CN-H-1: "It is a policy of the Council to require that all proposals for development on 'Primarily Residential' Site PR8 or on the adjoining Strategic Residential Reserve (SRR) lands be accompanied by a site specific flood risk assessment, prepared in accordance with the 'Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) or any subsequent iteration of said guidelines. Developers will be required to demonstrate that suitable measures can be put in place to mitigate flood risk on these sites and to ensure that no flood risks arise on adjoining lands as a result of developing the subject lands."

8 DONEGAL TOWN SUBMISSIONS

8.1 Overview

A total of 32 submissions were received comprised of:

- 31 from members of the public; and
- 2 from prescribed bodies.

8.1.1 Public Submissions

The 31 submissions predominantly relate to site specific zoning requests for significant scale land use types including requests for rezoning to 'Primarily Residential', 'Town Centre', 'Economic Development' and 'Opportunity Site' designation.

Five public submissions were received in relation to a single issue seeking the provision of a footpath to Scoil an Libh Íosa, beyond the underpass with the N56.

One submission has been received from a professional collective (of architectural, landscape architects and engineering professionals) in the town and it provides a conceptual revised land use zoning map for Donegal Town addressing the area of town centre, economic gateway sites, residential development, schools, neighbourhood centres and tourism opportunities.

The responses to each public submission are set out in Table 8.1 below.

8.1.2 Prescribed Bodies

Two submissions were received from prescribed bodies in relation to Donegal Town. Transport Infrastructure Ireland comment primarily in relation to Opportunity Sites close to the national road network and the need for Traffic and Transport Assessment on all Opportunity Sites. Irish Water (Ref. No. PB6) addresses minor, indeed editorial issues only. The specific issues raised are summarised and responded to in the last rows of Table 8.1.

8.2 Other Issues Arising

8.2.1 Existing playing field adjacent to Tirconail Park, Killybegs Road

The land use zoning map erroneously shows the existing playing field adjacent to Tirconail Park as 'Local Environment' and 'Visually Vulnerable.' In order to reflect the existing recreational use at this location, it is proposed to identify the area as 'Recreation and Amenity' as set out in the recommendation below.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA1 and DTMA2' contained at the end of this section of the report from 'Local Environment/Visually Vulnerable' to 'Recreation and Amenity.'

This is a Material Alteration- Ref. DTMA1.

2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA1 and DTMA2' contained at the end of this section of the report from 'Local Environment to Recreation and Amenity.'

This is a Material Alteration- Ref. DTMA2.

8.2.2 Stage 2, Strategic Flood Risk Assessment- Opportunity Site 3, Drumlonagher

The Stage 2 Strategic Flood Risk Assessment delineates Flood Zones A and B encroaching significantly into the western portion of 'Opportunity Site 3' at Drumlonagher. Given the central location of Flood Zone A and the extent of flooding events that have occurred at existing properties to the west, it is considered necessary and appropriate to rezone the areas of both Flood Zone A and B from 'Opportunity Site 3' to 'Recreation and Amenity.' Accordingly, the range of uses identified for the remainder of the site are acceptable in principle as the lands are located within Flood Zone C. Policy DT-ED-3 in the Draft Plan appropriately requires a flood risk assessment as part of any proposal coming forward. The recommendation below provides for the aforementioned rezoning together with amendment to the discussive text in the Draft LAP in relation to 'Opportunity Site 3' in order to accurately state the area of the site and to clarify the need for site specific flood risk assessment as part of any proposal.

Recommendation:

Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA3' contained at the end of this section of the report from 'Opportunity Site 3' to 'Recreation and Amenity' and also to clarify the discussive text at section 9.5.3, page 124, headed 'Opportunity Site 3: Drumlonagher' so that it reads as follows (new text in blue, text for deletion in strikethrough):

Opportunity Site 3: Drumlonagher

This area comprises 6.5 hectares and is located adjoining the R267 while the N56 bypass route adjoins the northern boundary of the site. The lands are located on the eastern edge of the plan boundary and represent a high profile and key gateway site to the town, whether observed on entrance into the town or by onward journeys to Killybegs, Ballyshannon or Sligo which also dual as the route of the Wild Atlantic Way. Potential uses include enterprise, business, research and innovation, commercial uses and education, civic and/or health provision. The existing Donegal County Council Public Service Centre is located to the east of the site accessed via one key service route which will also provide access for future potential development of the Opportunity Site. The Public Service Centre already provides a landmark building of notable scale and its design and architectural form are of high quality setting a benchmark for the overall development the Opportunity Site. Significant issues are evident in relation to flood risk downstream of the Opportunity site **which will necessitate the carrying out a site specific Flood Risk Assessment as part of any proposed development. In addition,** ~~as well as the need for~~ junction improvement at the R267 **will be required** in order to accommodate the associated and cumulative volumes of traffic. Policy DT-ED-3 refers'.

This is a Material Alteration- Ref. DTMA3.

8.2.3 Stage 2, Strategic Flood Risk Assessment-Primarily Residential Sites PR4, PPR5 and PR6 and adjoining 'Strategic Residential Reserve.'

The Stage 2 Strategic Flood Risk Assessment delineates Flood Zone A encroaching in a linear manner through Primarily Residential Sites PR4, PR5 and PR6 and adjoining 'Strategic Residential Reserve.' The recommendation below provides for the necessary rezoning and the consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of this section of the report from 'Primarily Residential PR4' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. DTMA4.

2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of this section of the report from 'Primarily Residential PR5' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. DTMA5.

3. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of this section of the report from 'Primarily Residential PR6' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. DTMA6.

4. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of this section of the report from 'Strategic Residential Reserve' to 'Recreation and Amenity'.

This is a Material Alteration - Ref. DTMA7.

5. To amend the Draft LAP as follows to make consequential amendments relating to housing supply as follows:
 - (i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;
 - (ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report .

This is a Material Alteration - Ref. GENMA1.

6. Amend chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out in the text at the end of this section of the report.

This is a Material Alteration - Ref.DTMA8.

8.2.4 Stage 2, Strategic Flood Risk Assessment- Economic Development lands at Drumlonagher and Milltown

The Stage 2 Strategic Flood Risk Assessment delineates Flood Zone A and B either side of the River Eske and encroaching into lands identified as 'Economic Development' at Drumlonagher and Milltown. The recommendation below provides for the rezoning of the area of Flood Zone A from 'Economic Development' to 'Recreation and Amenity.' In accordance with the Flood Risk Management Guidelines, 2009, the types of uses provided for under 'Economic Development' zoning are categorised as 'less vulnerable uses' and, within Flood Zone B, development of 'less vulnerable uses' is identified as appropriate and no justification test is required. Therefore, no further alteration is recommended in relation to the lands identified as being with Flood Zone B.

Recommendation:

To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA9' contained at the end of this section of the report from 'Economic Development' to 'Recreation and Amenity.'

This is a Material Alteration - Ref. DTMA9.

Table 8.1: Donegal Town Submissions

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
PUBLIC SUBMISSIONS				
DT1	Kevin McGrory	<p>Submission requests that lands within the townland of Ballyboyle, Donegal Town be included within the town boundary of the Donegal Town LAP in order to obtain planning permission for 6 dwellings and sewage treatment plants for family members. The following supporting information is provided:</p> <ul style="list-style-type: none"> ▪ Notes that there is considerable commercial development in close proximity, mainly holiday home developments. ▪ Notes that planning permission has recently been granted for a factory outside the town boundary. ▪ Notes that most developments are being advanced by persons who are not from the area. 	No	<p>Although a map did not accompany the submission, the townland of Ballyboyle is located immediately outside the western plan boundary of Donegal Town. The plan boundary currently runs between the townland boundaries of Rosssylongan and Ballyboyle where it provides for the inclusion of a number multiple residential and holiday home developments as 'established development' and thereafter recognises the rural nature of the area as 'Local Environment.'</p> <p>The proposal to extend the plan boundary further to include any additional lands at Ballyboyle would not be considered appropriate as the area is significantly removed from the established urban form of the town, is rural in nature and is not served by waste water network. Furthermore an extension of the plan boundary is not required in order to achieve the strategic objectives for Donegal Town as sufficient other lands are identified to cater for the projected growth. For information, proposals for development of lands in the townland of Ballyboyle would be considered in the context of the relevant policies of the existing County Donegal Development Plan 2012-2018 or the forthcoming County Donegal Development Plan 2018-2024, when adopted. It is also noted that submission reference DT10 also relates to lands in Ballyboyle and is accompanied with a map.</p> <p>Recommendation: No change.</p>
DT2	MH Associates, Gregg Smeaton	Submission requests that lands at Brookfield, Donegal Town zoned as 'Local Environment' in the Draft LAP be re-zoned to either	Yes See separate folded map for	The permission referred to in the submission for 7 no. housing units (Ref 15/51518) is noted and is an extant permission valid until March 2021. Although located on the southern area of the

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>residential or established development as planning permission for the construction of 7 housing units exists on the subject lands, 15/51618 refers.</p>	<p>Donegal Town (Map 6)</p>	<p>town, the zoning of the land as 'Primarily Residential' would provide for infilling of a small pocket of land (0.5 hectares) within an existing cluster of multiple residential development. Furthermore, having regard to the limited number of housing units to be delivered at this location, it is not considered that the rezoning would be inconsistent with the Core Strategy. It is noted that the lands comprise 0.5 hectares and have the potential to deliver 7 residential units. This proposed rezoning, together with other proposed material alterations arising from submission(s) DT2, DT5, DT15 and other issues set out at section 8.2.3 of this report, would result in a total land supply for housing purposes of 23.5 hectares. It is considered that the resultant excess in housing land supply in Donegal Town of 2.5 hectares is within the general parameters of the Core Strategy and will be guided through a monitor and manage approach. Consequential amendments to the text of the Draft Plan are therefore also required at section 2.1.1 and Table 2.3 as well as at section 9.6.2 and table 9.1 in order to reflect the accurate amounts of land supply for housing as a result of the relevant collective Proposed Material Alterations contained in this report.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA10' contained at the end of this section of the report from 'Local Environment' to 'Primarily Residential' and label the area as 'PR7.' <p>This is a Material Alteration - Ref. DTMA10.</p> <ol style="list-style-type: none"> 2. Amend the Plan so as to make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>housing):</p> <ul style="list-style-type: none"> (i) To amend chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out in the text at the end of this section of the report. <p>This is a Material Alteration - Ref.DTMA8.</p> <p>3. Make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <ul style="list-style-type: none"> (i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and; (ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report. <p>This is a Material Alteration - Ref. GENMA1.</p>
DT3	Dennis Feeley	<ol style="list-style-type: none"> 1. Submission requests that lands adjacent to Lidl at the Drumlonagher Roundabout be rezoned from 'Local Environment' to either 'Economic Development' or 'Established Development' as the site surrounds Lidl in a pattern of linear economic development; there is an 'Opportunity Site' on the opposite side of the road being developed. Also states the recent refusal of permission for a cinema on this site has highlighted the need for proper zoning. 2. Submission requests that lands identified on an attached map and zoned as Opportunity site 2 be rezoned to 'Town 	<p>Yes</p> <p>See separate folded map for Donegal Town (Map 6)</p>	<ol style="list-style-type: none"> 1. The area (lands adjacent to Lidl) referred to in this submission is addressed comprehensively in the responses to submissions DT16 and DT24. The recommendation in relation to DT16 provides for a rezoning from 'Local Environment' to 'Established Development' in order to reflect the area recently granted planning permission for the expansion of the Lidl Foodstore. The recommendation in relation to DT24 provides for rezoning from 'Local Environment' to 'Opportunity Site 9' in relation to the remainder of the lands and adjoining lands to the south west. Therefore please refer to the response to DT16 and DT24. 2. The area (Opportunity Site 2- The Mullans) referred to in this submission is addressed comprehensively in the response to submission DT18 which provides a recommendation to

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Centre' for the reasons stated below:</p> <ul style="list-style-type: none"> • The site is closer to the Diamond than other sites zoned as Town Centre and it is within walking distance of the town centre. • Site is disadvantaged by adjacent bypass and viewed the same as sites further out of town. • Some of the lands zoned as Town Centre are in flood plains and some are on elevated sites. • Lack of suitable land could be hindering the development of Donegal Town. • Drumlins are zoned as town centre and a Drumlin has been cut into already to facilitate development along Séné Lane. <p>3. Suggests bilingual signage be encouraged in the town as it serves the Gaeltacht, and bilingual signage encouraged in housing estates based on the locality. Also suggests that townland names should be used in estate names as the growth of a town outwards often results in the loss of townland names.</p> <p>4. Submission refers to policy DT-TC-5 that provides for roads and junction improvement and traffic management for any future development at Séné Lane. States that 2 recent developments on this</p>		<p>extend the 'town centre' to include part of the lands referred to in this submission. Therefore please refer to the response to DT18.</p> <p>3. Comments noted. The policies of the Draft CDP will be implemented in relation to both bilingual signage and naming of estates and these are set out in Appendix A of the Draft LAP for information. (Specifically refer to Policy UB-P-21 and reference to the 'Development Guidelines and Technical Standards' of the Draft CDP 2018-2024).</p> <p>Recommendation: No change.</p> <p>4. Comments noted. Any future proposal on 'Opportunity Site 5' at Séné Lane would be required to provide for the necessary roads infrastructure improvements as outlined in Policy DT-TC-5.</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Lane provided only limited traffic management. Refers to a problem with the junction onto Main Street and Quay Street suggesting there should be an 'entry only' sign on Main Street and a signalised junction at Quay Street.</p> <p>5. Suggests that the Council in conjunction with local businesses develop a one way system as lower Main Street is unable to carry 2 way traffic along with car parking and that Tirchonaiill Street, Castle Street, Water Street, and Séné Lane should all form part of this discussion.</p> <p>6. Extra parking should be provided near the town centre and on-street parking on busy streets removed.</p>		<p>Recommendation: No change.</p> <p>5. and 6: Comments noted. Potential measures are being sought and followed up on an ongoing basis to improve traffic movement, accessibility and car parking within the town centre.</p> <p>Recommendation: No change.</p>
DT4	Pat O'Connor of O'Connor Burke Architecture on behalf of Shaun Doherty	Submission refers to lands zoned as PR2 in Donegal Town Draft LAP zoning map and states their client, the landowner, is happy with this zoning. Note: No map accompanied the submission.	No	Noted. Recommendation: No change.
DT5	Declan M. McCabe of McCabe Architects on behalf of Barry Monaghan	Submission requests that the Draft Land Use Zoning Map for Donegal Town be amended at Drumlonagher to provide for the following: <ul style="list-style-type: none"> Provision of a new strategic link road to link the existing roads at Drumlonagher and Farmleigh Park that joins the Laghy Road to open up lands and to relieve traffic congestion. 	Yes See separate folded map for Donegal Town (Map 6)	The submission provides for a sustainable and positive approach to the supply of 'Primarily Residential' and 'Economic Development' lands in the town that have the potential to integrate effectively with the adjoining surrounding established landuse, to grow the town sequentially and which will maximise existing infrastructural services. The re-zonings are therefore provided for in the recommendations below. The proposal in relation to the potential for the creation of a

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<ul style="list-style-type: none"> • Suggest the rezoning of part of the lands from 'Local Environment' to 'Residential' for the following reasons: there is a shortage of residential land on the edge of the town centre, it is an extension of an existing residential development, and there are currently not enough zoned residential lands in the Draft Plan. Furthermore, suggests that lands to the south of this site and south of the suggested link road should be zoned residential or residential reserve. • Suggest the rezoning of lands from 'Local Environment' to 'Economic Development' between the suggested 'link road' and adjoining lands that are zoned in the Draft Plan as 'Established Economic Development' and 'Economic Development' stating that such development would make proper economic sense. 		<p>strategic road linking from Drumlonagher and Farmleigh Park has merit however it is not considered appropriate to delineate any such road on the land use zoning map in order to provide for fluidity in access arrangements through the design process and configuration of layouts including appropriate integration with the existing uses.</p> <p>The proposal relating to the rezoning of land from 'Local Environment' to 'Residential' or 'Strategic Residential Reserve' on lands south of the site of the submission is not considered appropriate as the gradient in this area rises and leads to one of the important areas of drumlin landscape which form defining features in Donegal Town. It is therefore not considered appropriate to alter the plan in this regard.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA11 and DTMA12' contained at the end of this section of the report from 'Local Environment' to 'Economic Development.' <p>This is a Material Alteration – Ref. DTMA11.</p> <ol style="list-style-type: none"> 2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA11 and DTMA12' contained at the end of this section of the report from 'Local Environment' to 'Primarily Residential' and to label the 'Primarily Residential' area as 'PR8.' <p>This is a Material Alteration – Ref. DTMA12.</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>3. Amend the Plan to make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p>(i) To amend chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out in the text at the end of this report.</p> <p>This is a Material Alteration – Ref. DTMA8.</p> <p>4. Make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p>(i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;</p> <p>(ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.</p> <p>This is a Material Alteration – Ref. GENMA1.</p>
DT6	Siobhán McNamara & Raymond Jordan on behalf of Killymard Old Church Restoration Committee.	<p>The submission outlines the need for a footpath from Donegal Town to St Mary's Church via Lough Eske Road for the following reasons:</p> <ul style="list-style-type: none"> Regular events in the area around the school, parish hall and old St Mary's Church result in pedestrians using the road which is dangerous. The ongoing works to restore the old St Mary's Church will increase the number of events and therefore increase the number of walkers. A footpath would make the historic area 	No	<p>The issues raised in the submission are noted and have been raised by a number of other submissions also. Although the road referred to is largely located outside of the plan area, it is considered appropriate to identify an indicative walkway/cycleway along the extent of the route that is within the remit of the Plan. It is noted that the lack of footpath at this location has been raised at MD meetings and as a result, efforts are ongoing to identify potential funding sources for delivery which may involve a phased approach dependant on those resources.</p> <p>Recommendation: Amend the Draft LAP to identify an 'Indicative Walkway/ Cycleway' along the Lough Eske Road (L-</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>more accessible.</p> <ul style="list-style-type: none"> • Although a rural road, it is used as an alternative and shorter route to the main Ballybofey or Killybegs Roads. • Large delivery vehicles also use to road to service the two nearby hotels. • The road is used by tourist as it forms part of the Bluestack Drive. 		<p>1915-2) as far as the plan boundary in the townland of Drumrooske West.</p> <p>This is a Material Alteration– Ref. DTMA13.</p>
DT7	Jackie Grant	<p>Submission relates to public realm and physical quality and character of the town making the following suggestions:</p> <ul style="list-style-type: none"> • Streetscape: Shopfronts are important to the character, quality and perception of shops including traditional features, materials signage, proportioning. Design guidance should also be utilised. In addition, state that streets would benefit from traditional stone paving, traditional street furniture and electricity cables, transformers and sub stations should be concealed. • States that approach roads at Tullyearl, Ballybofey Road and Killybegs Road are unattractive and uninviting. Suggests that public art be commissioned for each roundabout to enhance visitor's first impression coming into town. • Riverscape: Suggests a riverscape maintenance plan is required to reinforce the bank walls on New Row and a walking trail could be created. Also suggests the lighting of the towns 3 bridges would be an excellent feature. 	No	<p>The physical quality of the town including environment, heritage, streetscape, public realm, walkways and riverscape is a central theme within the LAP. Improvements to quality and character are identified as a key component of the strategy to further strengthen Donegal Town as an attractive place to invest in, to live in and to visit. The types of suggestions outlined in the submission are therefore embedded in the strategy of the LAP through for example the strategic vision of the Plan as well as objectives and policies relating to:</p> <ul style="list-style-type: none"> • The enhancement of townscape. • Creation of civic space. • Green infrastructure including walkways. • The riverine environment. • The identification of 'Area of Townscape Character' and specific policy in relation to design and quality within the area. <p>Recommendation: No change</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		Suggests plans be put in place to address trees falling into the river.		
DT8	Michael and Caroline Feeney	Submission requests the construction of a footpath along the road from Drumkrooske to Scoil an Linbh Íosa for reasons of road safety and amenity for leisure walkers and people attending local community facilities in Killymard.	No	The comments raised in the submission are noted and have been raised by a number of other submissions also. The issues have been addressed through the response set out in relation to submission Ref DT6 which recommends the inclusion of an indicative 'walkway/cycleway' on the land use zoning map for the extent of the road that is located within the plan boundary.
DT9	Donna Maskey, Manager of County Donegal Restoration CLG	<p>1. Submission relates to the Old Station House (Donegal Railway Heritage Centre), Tyrconnell Street and requests that the site be considered as part of an opportunity site for the following reasons:</p> <ul style="list-style-type: none"> ▪ There is a need for stronger all weather tourism offer in the town and along the WAW to maximise potential as a world class tourism destination. ▪ The potential for a tourism, cultural and heritage destination of this site consisting of the old station house, adjoining gardens and exhibition space is a key strength. <p>2. Submission sets out the following needs of the organisation: access to accommodate greater tourism numbers, parking, signage, links to other tourism attractions, footpaths, better infrastructural services, space to expand and modernize, access to links/greenways, a tour train, link to railway museum from the town centre, stronger visual presence, potential to</p>	No	<p>1 and 2: The importance of the Old Station House which comprises the Donegal Railway Heritage Centre is acknowledged. It provides an important heritage asset and tourism product and its location in the heart of the town adds to the character and strength of the town centre. In the Draft LAP, the Donegal Railway Heritage Centre is within the defined town centre land use zoning and this provides a broad opportunity for the continuation of the existing use or further enhancement or extension of the existing use together with other viable activities. The town centre zoning is considered to be the most appropriate land use zoning approach at this site as it provides broader parameters for the consideration of any future development proposals. Specific reference as an Opportunity Site is not considered to be warranted and may furthermore have the effect of constraining development potential of the site.</p> <p>Recommendation: No change.</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		compliment a tourism hub, tourism information hub.		
DT10	Kevin Mc Grory	<p>Submission requests that lands within the townland of Ballyboyle, Donegal Town be included within the plan boundary of the Donegal Town LAP for the following reasons:</p> <ul style="list-style-type: none"> • The lands have been in family possession since the 1960s. • They wish to obtain planning permission for 6 dwellings and sewage treatment plants for family members. • There has been considerable commercial development in close proximity to their lands, mainly holiday home developments, housing developments and a factory has also been recently permitted outside the town area. 	<p>Yes See separate folded map for Donegal Town (Map 6)</p>	<p>Note a similar submission (DT1) also relates to lands in Ballyboyle but was not accompanied by a map.</p> <p>The identified lands in the townland of Ballyboyle are located outside the western plan boundary of Donegal Town. The plan boundary currently runs between the townland boundaries of Rosssylongan and Ballyboyle. Lands that are within the plan boundary include a number multiple residential and holiday home developments as 'established development' only and thereafter recognises the rural nature of the area as 'Local Environment.' This approach indicates that the area is not suitable for significant development.</p> <p>The proposal to extend the plan boundary further to include the lands at Ballyboyle would not be considered appropriate as the area is significantly removed for the established urban form of the town, is rural in nature and is not served by waste water network. Furthermore an extension of the plan boundary is not required in order to achieve the strategic objectives for Donegal Town as sufficient other lands are identified to cater for the projected growth. For information, proposals for development of the subject lands would be considered in the context of the relevant policies of the existing County Donegal Development Plan 2012- 2018 or the forthcoming County Donegal Development Plan 2018-2024, when adopted.</p> <p>Recommendation: No change.</p>
DT11	Seamus Campbell	Submission requests the consideration of a footpath and the upgrade of the road from the town to Killymard School, St Mary's Church and playing fields for reasons of	No	The comments raised in the submission are noted and have been raised by a number of other submissions also. The issues have been addressed through the response set out in relation to submission Ref DT6 which recommends the inclusion of an

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		traffic safety, and access to amenities.		indicative 'walkway/cycleway' on the land use zoning map for the extent of the road that is located within the plan boundary.
DT12	WRS Allan of Allan Curran Architects Ltd on behalf of Old Mill Hotels Ltd.	<p>Submission requests the rezoning of lands adjacent to the Mill Park Hotel from 'Local Environment' to either 'Economic Development', an 'Opportunity Site' or preferably 'Mixed Use' for the following reasons:</p> <ul style="list-style-type: none"> The Mill Park Hotel are keen to be in a position to respond to growth in the hospitality industry owing to the success of the Wild Atlantic Way and an increase in visitor numbers. Concerned the draft Local Environment zoning would restrict the ability to respond to this pressure, as they are considering a number of options including an extension to the hotel, additional apartments and a range of additional leisure facilities. 	Yes See separate folded map for Donegal Town (Map 6)	<p>The lands identified in the submission comprise 3.4 hectares and are located on the western side of the national road and are currently undeveloped. They immediately adjoin the existing Mill Park Hotel complex and, as outlined in the submission, it is agreed that the lands may provide an opportunity for the future expansion of the existing hotel campus. It is also noted that the existing site of the hotel is used to its capacity and therefore the identification of land solely for the purposes of expansion is considered appropriate in order to support the strengthening of the tourist sector in the town. It is considered that the identification of the lands as an 'Opportunity Site' would be appropriate subject to specification of the use as being confined to the expansion of the existing hotel as well as demonstrating suitable access arrangements via the county road to the south west and adequate provision of the indicative walkway greenway along the route of the old railway line.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA14' contained at the end of this section of the report from 'Local Environment' to 'Opportunity Site 8' and to insert the necessary associated text as follows: <ol style="list-style-type: none"> Insert additional text in chapter 9 at the end of section 9.5.3, page 124 to state as follows (new text in blue): Opportunity Site 8: The Mullans This area comprises 3.4 hectares of land and is located to the immediate north of the existing Mill Park Hotel. The land is bounded to the east by the national road and to its southern boundary by the old railway line. It

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>exclusively represents a potential opportunity for the future expansion of the existing hotel in order to provide opportunity to increase tourist accommodation capacity and/or facilities in line with expected increases in visitor numbers to the area. Access to the site would not be permitted via the national road network. In lieu, any proposal would be required to show adequate access through the existing access arrangements serving the Mill Park Hotel. Suitable set back from the national road to the east would also be required. The route of the old railway line intervenes the northern boundary of the existing hotel and southern boundary of the site. The land use zoning map identifies an objective to protect the route of the old railway line for the purposes of an indicative walkway/greenway. Any proposal for development of Opportunity Site 8 would be required to demonstrate integration and delivery of a walkway/greenway along the old railway line for the length of the southern boundary of the site and future-proof it to ensure a viable connection to the remainder of the old railway line to the west. Policy DT-ED-4 refers.</p> <p>(ii) Insert an additional policy in chapter 9, at the end of section 9.5.4, page 125 to state as follows (new text in blue):</p> <p>Policy DT-ED-4: It is a policy of the Council to consider proposals on lands identified as 'Opportunity Site 8' for the expansion of the existing adjoining hotel in order to provide opportunity to increase tourist accommodation capacity and/or facilities in line with expected increases in visitor numbers to the area. Other uses outside of those related to the expansion of the existing hotel campus shall not be permitted. Access to</p>

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				<p>the site shall not be permitted via the national road network. Any proposal for the development of lands shall be required to demonstrate (i) adequate access through the existing access arrangements serving the Mill Park Hotel; (ii) necessary set back from the national road to the east; (iii) the integration and delivery of a walkway/greenway along the old railway line for the length of the southern boundary of the site and to future- proof it to ensure a viable connection to the remainder of the old railway line to the west. Any proposals shall also be required to demonstrate compliance with the Habitats Directive and compliance with all other relevant policies of this plan.</p> <p>This is a Material Alteration- Ref. DTMA14.</p>
DT13	Yvonne Callaghan on behalf of 'We Want Our Cinema Committee'.	<p>1. Submission makes the following observations in relation to the draft LAP:</p> <ul style="list-style-type: none"> • Welcomes a future vibrant town centre with a leisurely retail experience and adequate car parking. • Refers to key designated development areas and specifically references the PSC/ Lidl roundabout area. States that this area will greatly benefit from further enhancement of opportunity development. • Suggests all developments sought should be offered greater consideration and Donegal County Council should work with potential developers. • States that more development on the outskirts of towns leads to less congestion inwards and that town 	No	<p>The comments set out in the submission are noted. The LAP aims to support Donegal Town as a vibrant, successful and attractive place to live, work and to invest in and the Council will continue to work proactively in this regard in terms of its support for proposals that are appropriate across the full spectrum of planning and legislative considerations. The LAP specifically asserts the primacy of the town centre.</p> <p>Recommendation: No change.</p>

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		centres are more suited to smaller retail projects in existing suitable units available for use.		
DT14	Paul Doherty of paul Doherty Architects Ltd on behalf of Hugh Cassidy	<p>Submission requests the re-zoning of lands from 'Local Environment' to 'Residential' along the Old Laghy Road for the following reasons:</p> <ul style="list-style-type: none"> • Adjoining uses are private residential in a ribbon form and proposed zoning would open access to backlands while there are multiple housing developments nearby (Brookfield Manor and Cuirt Na Ri). • The site is flat with small undulations and can easily be developed without any major engineering works • There are no archaeological features within the site or nearby. • Gael Scoil is located 250m from the site. • Existing county road consists of footpaths therefore there is a complete pedestrian link to the town, to 2 national schools and the Gael Scoile. • Mains sewer and water pass the site located on the adjoining county road and have adequate capacity to serve a development with no need for pumping. • Storm water can directly discharge to an adjoining stream that discharges to the River Eske. • Planning permission has previously been granted on these lands for multiple housing; 05/20346 and ABP PL05.218112 refer. 	Yes See separate folded map for Donegal Town (Map 6)	<p>The site is located in the townland of Tully on the south eastern area of the town and comprises 3.6 hectares. It is surrounded by one off residential properties and represents an area of backland. For clarity, permission ref 05/20346 was refused by Donegal County Council but subsequently granted by An Bord Pleanala. Having regard to the nature of the site as a backland site and its serviceability in terms of infrastructure as well as the methodology in the Plan to identify a significant area of 'Strategic Residential Reserve' at Brookfield, to the west, it is considered that this site could provide for long term residential needs in the town. Given its location removed from the core urban fabric of the town and the phased approach to the identification of 'Primarily Residential' lands closer to the town centre (and north of the site) it is not considered appropriate to identify the site as 'Primarily Residential.' In order to recognise the long term potential, it is considered appropriate to identify the lands as Strategic Residential Reserve.' It is noted that the emerging Stage 2 Strategic Flood Risk Assessment indicates a Flood Zone A located outside the area of the site to the North East. The area of Flood Zone A is proposed to remain zoned as 'Local Environment.' Furthermore, it is noted that in the event the lands in question are considered for development, the flood related objectives and policies of the Plan would be considered and implemented to ensure a managed approach to flood risk arising from the nearby Flood Zone A or arising as a result of a proposed development on the subject site particularly any proposed storm outfall leading to the River Eske.</p> <p>Recommendation: Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA15'</p>

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		<ul style="list-style-type: none"> Site has potential to supply 40-60 houses. 		<p>contained at the end of this section of the report from 'Local Environment' to 'Strategic Residential Reserve.'</p> <p>This is a Material Alteration- Ref. DTMA15.</p>
DT15	Paul Doherty of Paul Doherty Architects Ltd on behalf of Seamus Quinn	<p>Submission requests the following changes to the Draft LAP:</p> <ul style="list-style-type: none"> Re-zoning of part 'Opportunity site 1' at the front of the GAA pitch to 'car-parking.' Re-zoning of the higher lands along the N56, in the NE of the site, within the opportunity site from 'Residential' to 'Office/medical facility with flexibility to provide IT office accommodation. The submission also requests amendment to the definition of uses for the Opportunity Site to include tourism related uses, leisure/recreational, healthcare, educational and commercial office accommodation. Requests that the area zoned 'Opportunity Site 1' be extended westward to include 3 fields to the SW that are in the landowners overall landholding, the rationale being that proposals to develop these fields for tourism purposes is required to justify infrastructural costs associated with the requirement to provide a roundabout at Doonan junction to gain access to the site. Submission states that planning permission previously existed in the middle of the overall landholding 	Yes See separate folded map for Donegal Town (Map 6)	<p>The subject site is recognised as a complex and large site and is identified as an 'Opportunity Site' in the Draft LAP due to its strategic importance for the town. There are a number of critical elements to this site and the submission requests are addressed as follows:</p> <ul style="list-style-type: none"> The request in relation to the delineation of 'car parking' at the front of the GAA pitch is considered to be acceptable on grounds that it will meet an identified need to service the GAA pitch and improve traffic safety. Therefore, the recommendation below makes provision for this amendment. The request in relation to the rezoning of the higher lands in the NE from 'residential' to 'office/medical facility with flexibility to provide IT office accommodation' is noted. For clarity, policy DT-ED-1 does not specify or map the precise location for residential development within the 'Opportunity Site' except that it shall be at a location that does not require pumping for waste water treatment. It is not considered detrimental to omit a 'residential' development type from the policy for the lands in question and this is reflected in the recommendation below together with the consequential amendments in relation to Core Strategy. Furthermore, the request in relation to the amendment of the broad development types for the 'Opportunity Site' in relation to medical facility and office accommodation is considered to be reasonable in terms of providing a comprehensive mixed use development proposal that is not anticipated to conflict with the town centre. This amendment is therefore reflected in the recommendation below.

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		<p>(04/1666 refers) for a 120 bedroom hotel, bars, restaurants, function suite, conference facilities, leisure/health centre and associated car parking with access and drainage arrangements, site development works and landscaping. Access from the N56 to service the proposed development was to be a roundabout located at the Doonan junction; this was referenced in previous LAPs and CDP.</p> <ul style="list-style-type: none"> • Submission states there is a current planning application (17/51771) on this site for access roundabout on the N56 associated with the realignment of the existing roads, 19 no. holiday chalets for short term letting, associated reception building and car parking areas, wellness centre, fitness centre, water sports/recreational activity based building, playgrounds and play areas, foul sewer pumping station with rising main, all roads, drains, sewers and services, footpaths, raised boardwalks. • Submission states that the view over the site from the Doonan Road junction has been incorporated into the overall design (17/51771) to be maintained as a development free boulevard, and it is recognised this view is important for tourist related development. States the Draft LAP has sterilised the 3 fields to the SW and doesn't achieve the objective to 		<ul style="list-style-type: none"> • The submission requests the extension of the 'Opportunity Site' westwards and provides a site layout showing the footprint of three buildings perpendicular to the road which are noted to cut across the natural contours of the site. It is acknowledged however, that the key view from the N56, which is designated as part of the Wild Atlantic Way can be protected within the overall development of the site from a critical mid-point along the road frontage with the N56. Thus, it is considered reasonable to provide for the extension of the site westwards. However, building design, height and composition as well as layout, levels, use of contours and landscaping are critical for any development in the area requested for extension and it is considered appropriate that the text relating to the site be amended to reflect this as provided for in the recommendation below. In addition, the southernmost part of these lands are shown as 'Visually Vulnerable' in the Draft LAP and given the sensitive location, it is considered appropriate to retain this policy. • The status of the current planning application is 'further information'. <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA16 and DTMA17' contained at the end of this section of the report from 'Opportunity Site 1' to 'Future Car Parking' and to make the associated text changes as follows: <ol style="list-style-type: none"> (i) Insert an additional land use zoning objective at table 3.1, page 12 to identify a new land use zone as 'Future Car Parking' and to include the objective as follows: 'To reserve land for future car parking purposes'. <p>This is a material alteration-Ref. DTMA16.</p>

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		<p>maintain the most important view through the site and the N56.</p> <ul style="list-style-type: none"> Submission states planning application (17/51771) includes the continuation of a bank walk through the subject lands towards the waters edge from the town centre to the Coilte forest at Rosssylongan; and is willing to discuss with the council the treatment, material and detailing of any bank wall to tie in with any proposal for a standardised water edge walkway. This walkway will be open to the public. 		<p>2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA16 and DTMA17' contained at the end of this section of the report from 'Local Environment' to 'Opportunity Site 1' and to make the associated text changes as follows:</p> <p>(i) Amend the text relating to 'Opportunity Site 1' in section 9.5.1, page 123 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>'Opportunity Site 1: Revlin This site consists of 6.6 10 hectares and is located along the N56 road leading to Killybegs. The 100kmph speed limit is positioned beyond the Western extremity of the site. The pattern of development in the area along the N56 comprises ribbon form of single dwellings and a ribbon of commercial development including some retail activity which cumulatively results in significant traffic movements on the national secondary road. To the east of the site, a local county road provides access to the established GAA pitch and clusters of residential development. The lands, at their most easterly point are approximately 1km from the Diamond and approximately 0.5 km from the edge of the town centre as it is defined in this LAP. The lands are coastal in their location, adjoining the Donegal Bay SPA and SAC. In addition, there are notable views to be had along the N56/ Wild Atlantic Way of Donegal Bay through Rosssylongan Strand and Revlin Point. The lands represent a complex development opportunity in terms of environmental, access, and visual amenity considerations together with their nature at an out-of-</p>

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				<p>town centre location. However, the lands represent an opportunity for the development of tourism related uses, leisure/ recreational, healthcare, medical facility educational and office accommodation in conjunction with limited residential development of up to 5 low density residential units at a location that will not require pumping for waste water treatment. Policy DT-ED-1-refers.'</p> <p>(ii) Amend Policy DT-ED-1 in section 9.5.3, page 124 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>'Policy DT-ED-1: It is a policy of the Council to consider proposals on Opportunity Site 1 (Revlin) for the development of tourism related uses, leisure/ recreational, healthcare, medical facility, educational and office accommodation in conjunction with limited residential development of up to 5 low density residential units at a location that will not require pumping for waste water treatment; or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, the requirements of the Habitats Directive, subject to all other relevant policies of the LAP including environmental considerations and compliance with the proper planning and sustainable development of the area. Having regard to the availability of other lands within and closer to the town centre, retail development will not be acceptable on this Opportunity Site. Any proposed development will be required to demonstrate suitable access onto the county road to the east together with realignment and appropriate upgrade at the junction of that county road onto the N56 and will</p>

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				<p>be required to demonstrate that the volumes and traffic movements associated with the proposed development will not have a negative impact on the capacity and safety of the N56. In addition, any proposed development will be required to demonstrate a layout that ensures the retention of critical views to Donegal Bay from the N56 and Wild Atlantic Way. Development proposals on the western portion of the lands shall also demonstrate suitable integration into the receiving landscape through appropriate building design, height and composition as well as consideration of layout, levels, use of contours and landscaping.</p> <p>This is a Material Alteration - Ref. DTMA17.</p> <p>3. To make consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing by amending chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out in the text at the end of this report.</p> <p>This is a Material Alteration - Ref. DTMA8.</p> <p>4. To make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <ul style="list-style-type: none"> (i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and; (ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.

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				This is a Material Alteration- Ref. GENMA1.
DT16	Fintan Morrin of The Planning Partnership on behalf of Lidl Ireland	<p>Submission relates to the existing LIDL site and a portion of adjacent lands. It requests that lands on the adjoining site to the rear of the existing Lidl building be rezoned from 'Local Environment' to 'Established Development' and make the following supporting comments:</p> <ul style="list-style-type: none"> • The rezoning request is to accommodate necessary expansion/ redevelopment of the existing store. • State that the lands are not Greenfield in nature and therefore are not appropriate as 'Local Environment.' • Refers to planning application 17/51384 which relates to proposed extension of the Lidl store into the subject lands. States the rezoning is sought so as not to materially encroach on Local Environment or Greenfield lands and suggests in any case that the zoning in the draft plan would not prevent permission being granted given the limited nature of the proposed extension. • State that the subject site is the optimum location for the proposed development as alternative Opportunity Sites are not available to the applicant and the Draft LAP recognises that the existing building stock in the town centre is already well utilised. 	Yes See separate folded map for Donegal Town (Map 6)	<p>Planning permission 17/51384 was granted on 20/01/18 to provide for demolition of existing foodstore and construction of new store within the lands in question. It is therefore considered reasonable and appropriate to identify the lands as 'Established Development.'</p> <p>Recommendation: Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA18' contained at the end of this section of the report from 'Local Environment' to 'Established Development.'</p> <p>This is a Material Alteration - Ref. DTMA18.</p>

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DT17	WRS Allan Curran of Allan Architects Ltd on behalf of Tommy and Nora Gallagher	<p>Submission supports the zoning of their lands at Muckros as 'Local Environment' but requests that the 'Visually Vulnerable' designation be removed as it is erroneous and sets out the following supporting information:</p> <ul style="list-style-type: none"> • Outlines that the landowners intention is to build one retirement home for their own use. • State that the land is heavily vegetated and cannot be seen from the road nor the navigable channel. • There are no views through the site to the bay beyond and there are 2 different swathes of planting between the road and the estuary. 	Yes See separate folded map for Donegal Town (Map 6)	<p>The lands in question are located on the seaward side of the road in the townland of Muckros and are acknowledged to consist of significant blocks of planting thus resulting in no clear view of the Bay. The purpose of 'visually vulnerable' designation is to identify landscapes of some sensitivity and, in Donegal Town these are made up of the elevated drumlin landscape and the coastal area. In considering the appropriateness of this designation, it is not relevant whether there is a view to the Bay, or likewise back to the public road. Of relevance is that the lands are identified as part of the important landscape setting of the town, from the public road or from the sea, and that significant change in the existing landscape environment may or may not be appropriate. A consistent approach to the identification of 'Visually Vulnerable' designation has been taken along the coast where there are sections of currently undeveloped coastline. Most importantly, the identification of 'Visually Vulnerable' designation does not preclude development but rather ensures an additional level of scrutiny. Through the application of appropriate design and layout, it may be feasible to integrate a new home and demonstrate that the interventions required in the landscape will be minimal with only limited loss of tree vegetation surrounding the proposed building. Therefore, in the interests of consistency, it is not considered that the removal of 'Visually Vulnerable' designation is warranted. Refusal of planning permission for 1 no. house is also noted on the site ref 17/51435 for reason of (i) the lands are currently zoned amenity in the CDP 2012-2018 and the proposed development contravenes the zoning and; (ii) that the proposed development would detract from the visual amenity of this undeveloped coastal strip.</p> <p>In the light of the recent refusal, the onus is on the applicant to demonstrate that the development proposed will not have a</p>

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				negative visual impact. Recommendation: No change.
DT18	Paul Doherty of Paul Doherty Architects Ltd on behalf of Tommy and Nora Gallagher	<p>Submission relates to lands within an area zoned 'Opportunity site 2- The Mullans' and requests that the town centre boundary be extended to include the subject site to provide core retail for a major national retailer. In support of the request the submission outlines the following additional information:</p> <ul style="list-style-type: none"> • The current zoning in the Draft LAP would not allow flexibility to capture passing trade, in and around 6000 cars per day along the N56. • Retail development at this location would encourage people to walk into the Diamond which is 320m away. States that ease of access to the Diamond will not add to traffic congestion. • Planning permission has already been granted for development of a bulky goods retail building and construction of a roundabout, footpaths and access road from the site to the town centre, and car parking (16/51136 refers) with construction works already started (current investment at approximately €1m) including the provision of the roundabout. Infrastructural services are currently being extended to the site. • States the Diamond due to its topography and proximity to the shore is choked for 	Yes See separate folded map for Donegal Town (Map 6)	<p>This site is identified in the Draft LAP as an 'Opportunity Site' for a range of mixed uses. Retail activity is limited to bulky goods in the Draft LAP in an effort to protect the vitality of the town centre. The comments raised in relation to the proximity of the site to the established town centre are noted. In this regard it is noted that the existing junction at Lough Eske Road is a walking distance of approximately 360m from the Courthouse. Dispersing to the uppermost, north western point of the site the subject of this submission, results in a further 200m walking distance, resulting in total distance from the Courthouse of approximately 560m. The entire hectareage of the site submitted in this submission is 7 hectares, the potential capacity of which can be understood when set against the comparative size of the existing core shopping area of and around the Diamond (extending from the Reel Inn to Lidl) which comprises 8.5 hectares of land. Accordingly, the inclusion of the entire site which is delineated in the submission (DT18) is not considered to be a reasonable approach and would have the potential to result in significant negative impacts on the vitality and viability of the existing town centre. In addition, the inclusion of the entire lands submitted within town centre would result in the gravitation of the town centre westwards and may impact on the viability of delivering the regeneration objectives envisaged through the development of 'Opportunity Sites 4 and 5.'</p> <p>However, it is considered that having regard to permitted layouts in respect of planning applications 16/51136 and 17/51075, there is merit in extending the town centre relating to a smaller area of the overall site located on lands closest to</p>

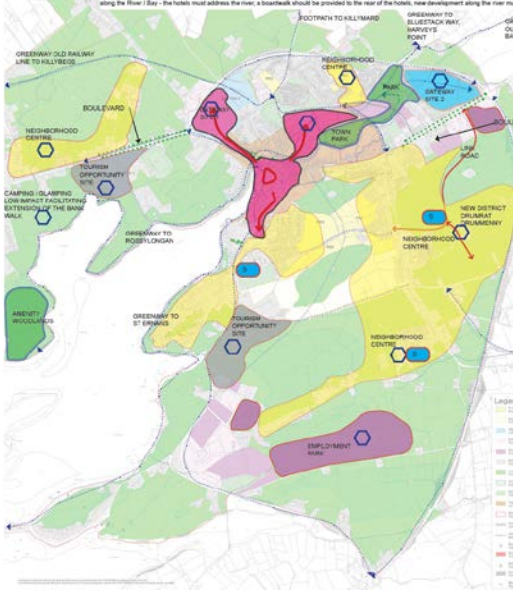
Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>expansion and has no adequate car parking which is an impediment to growth.</p> <ul style="list-style-type: none"> • States there is a current live application on this site for a 5 storey building to provide bulky goods retailing, restaurant, offices and additional 225 car parking spaces. • State it is also intended to provide development such as an all-weather children's play facility, possibly a town cinema and other suitable development that would complement the town centre. • State that local groups identified this site for the natural extension to the town centre and most suitable site to accommodate a large national retail outlet. • States that lands identified in the Draft LAP for large scale town centre development are within lands identified as flood plain by the OPW and it would be impossible to get funding for the development of this site nor insurance. 		<p>the existing town centre for the following reasons:</p> <ol style="list-style-type: none"> (i) The area closest to the town centre is approximately 400 metres from the existing core of the town. (ii) It is comparatively as close to the town centre as identified 'Opportunity Sites 4 &5'. (iii) Its identification for potential 'town centre uses' provides opportunity to deliver a natural transition to the remainder of 'Opportunity Site 2' for uses other than core town centre. (iv) The southern area of the lands is not the subject of flood risk. (v) It increases the capacity of the defined town centre within appropriate thresholds. <p>Further note that the Stage 2, Strategic Flood Risk Assessment predicts an area of pluvial flood risk at the south eastern portion of the site. The recommendation below provides for this flood risk to be referenced in Policy DT-ED-2</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA19' contained at the end of this section of the report, in order to include the area delineated, as 'Town Centre' as well as remaining as part of 'Opportunity Site 2,' on both the land use zoning map and on the town centre insert map and to make the following associated text changes: <ol style="list-style-type: none"> (i) Amend the text relating to 'Opportunity Site 2' in section 9.5.2, page 123/124 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue): <p>'Opportunity Site 2: The Mullans This site consists of approximately 11 hectares. It</p>

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				<p>comprises lands to the south east of the site that are identified as being within the 'Town Centre' and the remainder of the lands are it is located immediately North West of the defined town centre between the regional road known as the Lough Eske Road and the route of the N56 bypass. Established surrounding development comprises a number of long established residential properties fronting onto the Lough Eske Road and an area of mixed use development at Drumrooske on the North Eastern boundary. This The land that immediately adjoins adjoin the town centre part of the 'Opportunity Site' and provides an opportunity for business, offices, recreation and tourism related uses. It and also has potential for the development of retailing of bulky comparison goods only. located on the south western portion of the site closest to the town centre. The provision of other comparison goods at this part of the site that are not of bulky nature may have a detrimental impact on the vitality of the town centre and therefore shall not be permitted on this Opportunity Site the area located outside the defined 'Town Centre.' In addition it has potential for business uses, offices, recreation and tourism related uses. Uses appropriate to 'town centre' will be considered within the area located in the defined 'Town Centre.' The lands are significant in area and therefore a comprehensive strategy for the long term delivery of the entire site shall be required through the preparation of a masterplan as part of any proposals coming forward. In particular, proposals for the area defined as forming part of the 'Town Centre' will be required to demonstrate design and layout linkages to the existing town centre including provision on site of public realm/open space, walking and cycling</p>

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				<p>and including a strategy to address the potential physical obstacles to the pedestrian/cyclist as a result of the road network/infrastructure to serve the overall site. In this regard, proposals to manage the interface of significant roads infrastructure and pedestrian/ cycle/car will be required so as to ensure that the area identified as 'Town Centre' performs effectively as a new extension to the existing retail core and is readily and easily accessible on foot or by bicycle. In addition, proposals will be required to provide a set back of at least 50 metres form the N56. Policy DT-ED-2 refers'.</p> <p>(ii) Amend Policy DT-ED-2 relating to 'Opportunity Site 2' in section 9.5.4, page 124/125 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>Policy DT-ED-2: It is a policy of the Council to consider (i) proposals for the development of retailing (of bulky comparison goods only), business uses, offices, recreation, tourism related uses on that part of Opportunity Site 2 (The Mullans) located outside the defined 'Town Centre'; or for development providing for a combination of some, or all, of the aforementioned uses and; (ii) Uses appropriate to town centre on that part of 'Opportunity Site 2' located within the defined 'Town Centre'. Proposals on any part of 'Opportunity Site' shall demonstrate subject to compliance with the undernoted criteria and the requirements of the Habitats Directive, and be subject to all other relevant policies of the LAP including environmental considerations and compliance with the proper planning and sustainable development of the area. In order to protect and strengthen the vitality of</p>

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				<p>the town centre, retailing of comparison goods that are not bulky goods is not appropriate. Bulky retail development will only be permitted on the south western portion of the site at a location closest to the town centre. In particular, proposals for the area defined as forming part of the 'Town Centre' will be required to demonstrate design and layout linkages to the existing town centre including provision on site of public realm/open space, walking and cycling and including a strategy to address the potential physical obstacles to the pedestrian/cyclist as a result of the road networks/infrastructure to serve the overall site. The overall development of the lands will require a masterplan outlining a strategy for the integration of public and civic space including a walking and cycling strategy throughout the development providing for the integration of the route of the former railway line and linking to the town centre. A masterplan shall also demonstrate a suitable vehicular access of sufficient capacity to service the entire site as well as a 50 metre set back from the N56. Any proposal within the site will ensure a sufficient buffer between established residential development along Lough Eske Road and the proposed development in order to protect residential amenities. The lands adjoin an area of flood risk to the north eastern boundary and an area of predicted pluvial flooding at the south-eastern corner of the site and therefore any proposed development will be required to comply with the flood risk management objectives and policies of this Plan.</p> <p>This is a Material Alteration- Ref. DTMA19.</p>

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DT19	Donegal Town Local Architects Group C/o Paul Doherty (Group: Allan Associates Architects, McMullin Associates Architects, McCabe Architects, Paul Doherty Archtiects Ltd, Marcus Flanner, Landscape Architect and William Donoghue, Engineer).	1. Submission consists of a proposed revised land use zoning map for the town showing primarily conceptual land use zoning shapes (see map insert below). Submission advises that the proposed revised land use zoning map has been drafted by a collection of 4 architectural firms, an engineer and a landscape architect and that it has been discussed with and has the support of local councillors, former politicians, representatives of Donegal Town Business Focus Group, Donegal Town Community Chamber and the St. John Bosco Centre Committee. State that the group would welcome a meeting with planners before the final plan is adopted. Revised land use zoning map that accompanied the submission:	No (Note: Not mapped as it relates to the entire area of the plan).	1. Comments noted.

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		 <p>2. The revised land use zoning map identifies more areas for residential development (shown in light yellow extending to the south of the plan area and to the west along the Killybegs Road. Rationale is to strengthen residential patterns, providing choice, preventing landbanking, facilitating the creation of a new future proofed neighbourhood at Drumrat/Drumenny and using a masterplan approach.</p>		<p>2. Comments are noted however, the Planning and Development Act 2010 requires that Development Plans consist of Core Strategies which includes the need to outline the amount of land zoned for housing development in relevant land use plans and demonstrate consistency with projected growth in the RPGs (2010) in the case of County Donegal. The Draft CDP 2018-2024 provides the Core Strategy context for the target quantum of lands for 1st phase residential development in Donegal Town and targets a need for 21hectares of land. It is noted that the low densities have been utilised I the preparation of the Draft LAP in order to maximise the quantum of lands to be identified. This Plan already provides an excess of 1st phase</p>

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		<p>3. The revised land use zoning map identifies additional employment areas (shown in purple) to the north and east of Abbots Ireland/Cherrymore and at Drumlougher adjacent to Lidl. Rationale is to provide large scale employment areas that should be suitably services. State that Council should bring in stakeholders such as IDA.</p>		<p>residential lands and the excess is rationalised on the basis of the implementation of a monitor and manage approach. In addition, the Development Plan Guidelines, 2007 require the incremental growth of towns as opposed to over-zoning of land with the potential to result in housing growth on the edge of towns, remote from urban fabric, services and infrastructure. Therefore, to rezone to provide for the extent of land for residential development outlined in the submission would neither be consistent with the Core Strategy of the Draft CDP 2018-2024, the RPG's 2010 and anticipated RSES and the Development Plan Guidelines, 2007 nor would such a strategy result in the proper planning and development of Donegal Town.</p> <p>Recommendation: No change</p> <p>3. Proposed revisions in relation to lands adjacent to Lidl are noted. Please refer to comprehensive responses and recommendations to submissions DT16 and DT24 which provide for recommended rezoning proposal in this area. In relation to additional employment areas to the north and east of Abbots Ireland/Cherrymore, it is not considered that a further zoning in this area is either warranted or appropriate. Firstly, significant employment generating lands have been provided throughout the area of the Plan and through the recommendations contained within this report. This provision is in the form of zonings for 'Economic Development', 'Established Economic Development', 'Opportunity Sites', 'Town Centre' as well as appropriate provision within 'Established Development' and 'Local Environment'. Furthermore, the area north of Cherrymore Kitchens comprises pockets of one-off houses and the</p>

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		<p>4. The revised land use zoning map shows an extended town centre area (shown in pink colour) to include Opportunity Site 2 at the Mullans and the Bosco/Mart site as well as growth toward Supervalve to the south. Rationale is that that the existing town centre is limited for future growth and the Diamond is at capacity. Notes that public realm is key priority and pedestrian/tourist access.</p> <p>5. The revised land use zoning map shows a town park area overlapping with that shown in the draft Plan and an additional area to the north east (shown in dark green colour). State that this is critical as there is no public space at present and existing sports clubs are short of pitch space, located on a flood plain and accommodating the old railway.</p> <p>6. The revised land use zoning map shows 2 tourism opportunity sites (shown in grey), one at Revlin on Killybegs Road and one</p>		<p>zoning in the Draft LAP of 'Local Environment' in this area will ensure the protection of residential amenity.</p> <p>Recommendation: No change.</p> <p>4. The proposals in the submission at the Bosco/Mart and at Supervalve reflect the 'Town Centre' zoning in the Drat LAP. Please refer to comprehensive response and recommendation to submission DT18 which provides for recommended rezoning proposal in the area of 'Opportunity Site 2-The Mullans'.</p> <p>Recommendation: No change.</p> <p>5. The lack of a public park in the town is noted as a key environmental, social and health deficiency in the town. Detailed assessment of flood risk together with the options for pedestrian access to future potential parkland has been considered in the configuration of 'Opportunity Sites 4 & 5' and is further provide for through the response and recommendation set out to submission DT23 and through the recommendation arising from the Stage 2 SFRA set out under 'other issues' at section 8.2.4 of this report. As a result, the area of 'Recreation and Amenity' largely correlates with the proposal in the submission.</p> <p>Recommendation: No change.</p> <p>6. Please refer to comprehensive response and recommendation to submission DT15 which provides for</p>

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		<p>at Lurganboy/Ardchicken, north of the craft village. Notes that flexibility should be provided in these sites to also allow for medical or office or light commercial development.</p> <p>7. The revised land use zoning map indicates that lands described as 'Gateway site 2' (Opportunity site 3 adjacent to the PSC in the Draft LAP) should be linked to the proposed town park with pedestrian and cycle linkages to the town centre.</p> <p>8. The revised land use zoning map shows neighbourhood centres (shown as black hexagons) throughout the plan area in all designated residential, gateway and tourism areas.</p> <p>9. The revised land use zoning map shows locations for three new schools (shown in bright blue) and Drumrat/Drumenny, Brookfield (Gaelscoil) and expansion of the secondary school at Ard Chicken or new secondary school.</p>		<p>recommended rezoning proposal in this area of 'Opportunity Site 1-Revlin' and supports the tourism potential of the lands in question. In relation to lands at Lurganboy/Ardchicken, the proposed rezoning is not considered necessary as there is sufficient land supply at other locations in the plan area.</p> <p>Recommendation: No change.</p> <p>7. Comments noted. The land use zoning map in the Draft LAP indicates indicative pedestrian/cycle linkages from 'Opportunity Site 3-Drumlonagher' to the area identified in the Draft LAP as 'Urban Parkland.'</p> <p>Recommendation: No change.</p> <p>8. It is noted that neighbourhood centres are shown within areas proposed in the submission for residential land use zoning. Please refer to previous response in relation to land supply for residential areas outlined at point 2.</p> <p>Recommendation: No change.</p> <p>9. School development and expansion is provided for in the plan through the 'Established Development' land use zone which relates to two of the proposed locations namely the Gael Scoile and expansion of Abbey Vocational School. Other school development is not precluded by the Plan through the identified policies of the Draft CDP (CCG-P-4, 5 and 8 refer as indicated at Appendix A of the Draft LAP).</p> <p>Recommendation: No change.</p>

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		<p>10. The revised land use zoning map shows the designation of an 'amenity/woodlands' with walks/trails at Rosssylongan on Coillte lands.</p> <p>11. The revised land use zoning map shows a number of greenways.</p>		<p>10. The area referred to in the submission at Rosssylongan is identified as 'Local Environment' and 'Visually Vulnerable' which would not preclude the enhancement of the area or walking trails.</p> <p>Recommendation: No change.</p> <p>11. The greenways shown on the revised land use zoning map submitted as part of DT 19 are:</p> <ul style="list-style-type: none"> • Old Railway line to Killybegs- this is already shown on the land use zoning map of the Draft LAP as an 'Indicative Walkway/Cycleway'. • Greenway to Bluestack Way/Harveys Point and Old Railway to Barnesmore – the part of the route located within the plan area is already shown as an 'Indicative Walkway/Cycleway' on the land use zoning map of the Draft LAP. • Greenway to Rosssylongan- this is shown on the land use zoning map of the Draft LAP as an 'Indicative Walkway/Cycleway' and is recommended below to be extended to the plan boundary. • Greenway to St Ernans- this is shown on the land use zoning map of the Draft LAP as an 'Indicative Walkway/Cycleway' looping back to the town at the Golf Course Road. The recommendation below provides for this route to be extended to the plan boundary. <p>In addition, the recommendation below provides for insertion of additional text to reflect the potential greenways identified.</p> <p>Recommendation:</p> <p>1. To amend the Draft LAP in relation to greenways as follows:</p>

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		<p>12. State that the Plan should provide small areas for housing for the elderly and sheltered accommodation to facilitate the ageing population, which will allow for independent living in a community environment within walking distance of the town. No locations are identified on the revised land use zoning map.</p>		<p>(i) To amend the 'Indicative Walkways/ Cycleways' delineated on the land use zoning map at the coastline south of Killybegs Road so as to extend as far out as the plan boundary and; to extend the delineated 'walkway/cycleway' from the Golf Course Road as far out as the plan boundary at St Ernans.</p> <p>(ii) To insert an additional objective at section 9.9.2, page 133 so as to state:</p> <p>Objective DT-EH-3: It is an objective of the Council to explore potential greenway connections in partnership with other organisations and interested groups at key locations including the Old Railway line to Killybegs; Bluestack Way/Harveys Point; Old Railway to Barnesmore; Bank Walk to Rossylongan and; to St Ernans.</p> <p>This is a Material Alteration- Ref. DTMA20.</p> <p>12. The Plan does not preclude consideration of housing for the elderly and sheltered accommodation particularly within pockets of 'Established Development' with ready access to services and facilities. This is also supported through policy CCG-P-4 of the Draft CDP as referenced in Appendix A of the Draft LAP. It is noted that the revised land use zoning map that accompanied the submission does not identify any specific potential sites for consideration.</p> <p>Recommendation: No change.</p>
DT20	Nicola Martin, on behalf of Scoil An Linbh Iosa Parents	1. Submission requests the upgrade of the Lough Eske Road towards Killymard and the provision of a footpath for priority status for 2018 outlining safety reasons	No	1. The comments raised in the submission are noted and have been raised by a number of other submissions also. The issues have been addressed through the response set out in relation to submission Ref DT6 which recommends the

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	Association	<p>for pedestrians, cyclists and drivers. States that the deficiency in the existing road results in problems for the national school and the 2 nearby hotels. The submission also states that the request is supported by a number of policies in the CDP 2012-2018 namely CS-O-10, T-P-4, T-P-5, T-P-40. States that the upgrade of the road will support schools/ community safety measures, enhance and develop local amenities and infrastructure and support a local vibrant tourism industry providing sustainability for job creation and security for young people.</p> <p>2. Suggests the Lough Eske area be designated EHSA in the next CDP and provide suitable footpaths and cycleways, owing to the attraction of the area by tourists.</p>		<p>inclusion of an indicative 'walkway/cycleway' on the land use zoning map for the extent of the road that is located within the plan boundary.</p> <p>2. The designation of the area of Lough Eske as EHSA is a matter for the County Development Plan and cannot be considered through this Local Area Plan.</p> <p>Recommendation: No change.</p>
DT21	Paul Doherty of Paul Doherty Ltd, on behalf of Maeve Melley, Emer Brennan and Ailbhe Rowlette	<p>Submission requests the rezoning of lands at Tullaghcullion from 'Local Environment' to 'Residential' for the following reasons:</p> <ul style="list-style-type: none"> • Site is 770m from the Diamond, 150m from the Abbey school, site identified in local community and business group submission as being suitable for residential development. • Site is SE of the heavily developed Golf Course Road. • There is existing vehicular access through the site of the single house and 	Yes See separate folded map for Donegal Town (Map 6)	<p>The comments made in the submission are noted and agreed as regards the site as an area of infill adjoining established residential development, proximity to the town and potential to contribute to the delivery of the necessary infrastructure shown by means of an 'Indicative Strategic Road Line' from the site to the Old Laghey Road. However, having regard to the parameters for housing land supply set out in the CDP Core Strategy, the site is considered to have merit as part of the long term strategic land bank for housing and therefore the recommendation below provides for rezoning to 'Strategic Residential Reserve' together with additional lands to the East along the route of the 'Strategic Indicative Road Line.' Note that</p>

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		<p>a public footpath back into Donegal Town from the South boundary.</p> <ul style="list-style-type: none"> • Serviced with mains water, sewage and storm drainage. • Site suited to provision of small pockets of residential units in an established residential area that could ideally provide for sheltered accommodation/ housing for the elderly. • Outlines previous planning permission granted ref 07/21054 which required proposals (along with adjoining landowner) to provide a roundabout to service this site and to access adjoining lands and provide potential link to the Old Laghey Road. Development of the site stalled due to recession. Significant investment made at this time in survey and design. • Advises that trees were felled on the site at DCC request due to concerns of potential falling trees. • States it is difficult to understand 'Visually Vulnerable' zoning on this infill site surrounded by existing residential development that does not break the skyline. 		<p>lands to the East are shown in part within Flood Zone A in the Stage 2 Strategic Flood Risk Assessment and are therefore dissected by an area of 'Recreation and Amenity' to reflect the extent of Flood Zone A. This alteration would serve to provide a complete policy framework in the context of the identified road network improvements in the Plan.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA21' contained at the end of this section of the report from 'Local Environment' and 'Visually Vulnerable' to 'Strategic Residential Reserve.' <p>This is a Material Alteration- Ref. DTMA21.</p> <ol style="list-style-type: none"> 2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA22 and DTMA23' contained at the end of this section of the report from 'Local Environment' to 'Strategic Residential Reserve.' <p>This is a Material Alteration- Ref. DTMA22.</p> <ol style="list-style-type: none"> 3. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA22 and DTMA23' contained at the end of this section of the report from 'Local Environment' to 'Recreation and Amenity.' <p>This is a Material Alteration- Ref. DTMA23.</p>
DST22	Scoil an Linbh Iosa	Submission refers to a proposed footpath from the flyover at the chapel; suggest this should be included on the zoning map to	No	The comments raised in the submission are noted and have been raised by a number of other submissions also. The issues have been addressed through the response set out in relation to

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		provide positive information for people who walk to mass and the potential to encourage others to walk to school.		submission Ref DT6 which recommends the inclusion of an indicative 'walkway/cycleway' on the land use zoning map for the extent of the road that is located within the plan boundary.
DT23	Paul Turley of John Spain Associates on behalf of Como Trading Limited	<p>1. Submission requests 4 key changes to the Draft LAP as follows:</p> <p>(i) That the central area of Opportunity site 4 that is identified as 'recreation and amenity' be relocated southwards to form part of the buffer between future development lands and the River Eske;</p> <p>(ii) Amendment to the written text as follows (text for deletion shown in strikethrough; new text for insertion shown in blue): 'In addition, an area of 'recreation and Amenity' has been identified within the centre of Opportunity Site 4 and also on lands to the south intervening Opportunity Site 4 and the river. These locations are This location is associated with the area of highest probability of flooding and provides for compensatory storage to facilitate future development of the opportunity site lands. This area of 'Recreation and Amenity' has potential to form a linear urban and riverside park as an important resource for the town. Given the nature of the site as a strategically important town centre regeneration site, any proposals for the lands will</p>	Yes See separate folded map for Donegal Town (Map 6)	<p>1 and 2: This site is located within the defined town centre and is identified as a brownfield site in nature as it comprises a number of buildings, both disused and in current use. It represents an important opportunity for the town centre to grow with viable linkages to the Diamond and performing a complementary expansion of the core retail area.</p> <p>This area is affected by significant flood risk. The approach in the Draft Plan published November 2017, utilised Draft CFRAM data to identify the primary areas of flood risk and to utilise these areas for future potential urban parkland while restricting the use of the Opportunity Site for 'less vulnerable uses' or 'water compatible uses' as defined by the Flood Risk Guidelines 2009 i.e. excluding 'highly vulnerable uses'. The Draft LAP provides for a masterplan approach to the development of Opportunity Site 4 (the subject site), Opportunity Site 5 (John Bosco Community Centre and the Mart) and the area identified as urban parkland. The Stage 2, Strategic Flood Risk Assessment prepared in respect of the Draft LAP identifies Flood Zone A and B within the site. Flood Zone A and B encroach on a larger area than identified in the Draft LAP and this would indicate that a level of rezoning is required.</p> <p>The submission seeks a reconfiguration of the lands identified as 'Recreation and Amenity', in particular the area located centrally within the site which also falls on the footprint of an existing building. The submission requests that this area, together with the existing car park area, be relocated to lands to the east and closer to the river. This proposal accords with the larger extent of Flood Zone A identified in the Stage 2 SFRA and is considered appropriate. The remaining area of</p>

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		<p>require the submission of a masterplan for an overall concept to integrate the development potential of Opportunity Site 4 and the potential of the adjoining 'Recreation and Amenity' lands as future linear riverine urban parkland.-</p> <p>(iii) The existing car parking area that is subject to a recreation and amenity zoning objective should be incorporated into opportunity site 4 objective as per the JDA masterplan appended to this submission.</p> <p>(iv) That 3 new indicative roadlines should be included in the zoning maps, to give access to opportunity sites 4 and 5 as shown in the masterplan submitted.</p> <p>2. Further detailed information is provided to support the submission as follows: The following supporting information is provided:</p> <ul style="list-style-type: none"> • An indicative masterplan for the site is appended to the submission • The alteration is sought to provide an appropriate framework for emerging development. Without the alteration, there is potential to adversely impact on the emerging development proposals (town centre type retail, services development, convenience store with associated parking and access) that are at an 		<p>Opportunity Site that is located within Flood Zone A is considered to be of small scale and its development and incorporation into the overall concept for the site, is considered to be necessary for the regeneration objectives of the town centre and therefore satisfies the requirements of the justification test. The recommendation below provides for the reconfiguration of lands identified as 'Recreation and Amenity.'</p> <p>The submission also sets out requested associated text changes to the Draft LAP. The recommendation below sets out appropriate text changes in this regard.</p> <p>The submission also requests the identification of 3 new indicative roadlines on the land use zoning map as shown on the masterplan drawing that accompanied the submission. It is not considered appropriate at this stage to map potential vehicular access (including a phased approach) to the site in the absence of greater information on the level and intensity of traffic that would be associated with a future planning application. However, it is noted that to maximise the regeneration objectives for the land, significant pedestrian access should be provided from Water Street.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA24 and DTMA25' contained at the end of this section of the report from 'Recreation and Amenity' to 'Opportunity Site 4'. <p>This is a Material Alteration- Ref. DTMA24.</p> <ol style="list-style-type: none"> 2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA24 and DTMA25' contained at the end of this section of the report from

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		<p>advanced stage.</p> <ul style="list-style-type: none"> • RPS have advised flood risk mitigation in the south of the site is appropriate and accords with guidelines. • Such a development could be delivered successfully whilst ameliorating flood risk elsewhere. • Approach has been prepared in consultation with an ecologist to advise on the FWPM associated with the River Eske and the need to retain a buffer zone. • Submission suggests that pedestrian and cycle routes could be provided through the site linking with the town centre vis the Magee factory site which has the potential to develop as a tourist hub. • Submission details the planning history for the site. • Submission provides a narrative review of parts of the draft LAP. • Submission points out that objectives and policies associated with Opp site 4 are broadly consistent with their emerging development proposals. • Submission states that the final planning application shall be accompanied by an NIS and EIA. 		<p>'Opportunity Site 4' to 'Recreation and Amenity' and amend the associated text as follows:</p> <p>(i) Amend the text at 9.4.5, page 120 as follows (new text in blue; text for deletion shown in strikethrough):</p> <p>'Opportunity Site 4: Milltown This Opportunity Site comprises circa 7.8 6 hectares. It is located within the defined town centre and is a brownfield site and it comprises a number of disused buildings as well as the Magee factory and office block. It is bounded by the River Eske to the South, Tirchonail Street to the west and Railway Road to the north. An indicative strategic road line marks the eastern boundary. A narrow laneway traverses through the centre from the west to the east. The general area is evidenced as having a fluvial flood risk in the OPW's CFRAMs programme and in line with the guidelines entitled, 'The Planning System and Flood Risk Management' the development of these lands is considered to be required to achieve the proper planning and sustainable development of Donegal Town. Flood risk has consequently informed the extent of the Opportunity Site identified and the types of uses that may be considered. Having regard to the extent of flood risk, the types of uses that may be considered within the identified Opportunity Site are town centre uses excluding the highly vulnerable uses identified in the Draft CDP (Table 5.4.1 of the CDP 2012 refers). Chapter 3 of this LAP sets out the policy context for flood risk assessment in the consideration of applications for planning permission and in this regard the objectives and policies of the Draft CDP will be applied.</p> <p>In addition, an area of 'Recreation and Amenity' has</p>

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				<p>been identified within the centre of Opportunity Site 4 and also on lands to the south intervening Opportunity Site 4 and the river. These This location is locations are associated with the area of highest probability of flooding. This area of 'Recreation and Amenity' has potential to form a linear urban and riverside park as an important resource for the town. Given the nature of the site as a strategically important town centre regeneration site, any proposals for the lands will require the submission of a masterplan for an overall concept to integrate the development potential of Opportunity Site 4 and the potential of the adjoining 'Recreation and Amenity' lands as future linear riverine urban parkland. There are also significant environmental considerations to be taken into account in the consideration of any proposals at Opportunity Site 4 as the Lough Eske and Ardnamona SAC is located along the River Eske and it includes several important habitats listed on Annex I of the EU Habitats Directive and supports a number of important species as listed on Annex II of the Directive including Atlantic Salmon and Freshwater Pearl Mussel. In addition, the Donegal Bay (Murvagh) SAC and Donegal Bay SPA are designated from Bridge Street'.</p> <p>(ii) Amend Policy DT-TC-3 at 9.4.7, page 122 as follows (new text in blue; text for deletion shown in strikethrough):</p> <p>'Policy DT- TC-3: It is the policy of the Council to consider proposals for the development of town centre uses excluding highly vulnerable development types as defined in the Draft CDP, table 5.4.1, on Opportunity Site 4 (Milltown), or for</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, the requirements of the Habitats Directive, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Any proposal for development shall be required to provide for a masterplan relating to the 'Masterplan Area' identified on Map 6. The masterplan shall set out an overall layout concept to integrate the development potential of the Opportunity Site and the potential of identified 'Recreation and Amenity' lands as future active parkland, including a suitably located pedestrian bridge crossing. Any masterplan and proposal made shall also (i) demonstrate suitable vehicular access to the site including provision for the indicative strategic road link identified on Map 6 and located to the east of the site (ii) provide for indicative pedestrian linkages identified on Map 6 (iii) submit an independent 'Flood Risk Assessment' and be in compliance with the guidelines entitled, 'The Planning System and Flood Risk Assessment', published 2009 including appropriately satisfying the requirements of the justification test at project level FRA (iv) demonstrate integration of open space/ civic space/ walkways/ cycleways within the development proposal and; (v) demonstrate a high quality urban environment'.</p> <p>This is a Material Alteration- Ref. DTMA25.</p>
DT24	Paul Turley of John Spain Associates on behalf of Como	Submission requests the rezoning of lands adjacent to Lidl at the Drumlonagher Roundabout from 'Local Environment' to 'Opportunity Site' including permissible uses	Yes See separate folded map for Donegal Town	The lands in question are located to the rear of the Lidl Foodstore and were the subject of a refusal of planning permission ref 17/51431 (no subsequent appeal submitted) for a cinema on grounds of (i) sequential growth of the town (ii)

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	Trading Limited	<p>for tourism, leisure, economic and commercial developments without unnecessary restrictions and sets out the following supporting information:</p> <ul style="list-style-type: none"> • The site is a brownfield, Gateway site along the N15 and its development will attract people into the town. • Advise of planning application for a cinema, recently refused (Ref 17/51431). • Outlines similarities of a proposed cinema with that the surrounding land uses both existing and permitted and difficulty with locating such uses within the compact urban form of the town centre. • Notes the natural boundary between urban and rural to the rear of the site. • Note that Donegal Town is identified as a Strategic Town in the current and forthcoming CDP's and identified as a town with 'Special Economic Functions.' States that the town needs to capitalise on this to deliver where possible in the short term and thus to 'set the wheels in motion' for further development. • Outlines question marks regarding the deliverability of the Opportunity Sites in the Plan. • Outlines the specific merits of the subject site including: beneficial shape and topography; single ownership which assists in deliverability; readily accessible; electricity, footpath, sewer and water available; within the 	(Map 6)	<p>visual impact on the approach road to the town (iii) traffic and transport related and (iv) premature pending the adoption of the Draft CDP and Draft LAP.</p> <p>The case made in the submission for the identification of the lands as an 'Opportunity Site' are accepted in the context of the extent and cluster form of surrounding existing and permitted uses, the opportunity to consolidate these land uses and the degraded nature of the site. The primacy of the town centre remains critical however, and its protection and enhancement is a fine balance when all 'Opportunity Sites' and 'Economic Development' lands located outside the town centre boundary are considered and this will, at all times, form part of the decision making process in the context of the proper planning and sustainable development of the area and is reflected in the recommendation below.</p> <p>The policy approach in the LAP for 'Opportunity Sites' is to provide suitable flexibility for the consideration of broad development types as opposed to defining specific and individual uses and therefore, the recommendation below provides for the consideration of tourism/leisure and economic developments on the subject lands (and the logical inclusion of adjoining lands to the south west) that are more appropriate for edge of town activity and that do not conflict with the objectives for town centre regeneration.</p> <p>Notwithstanding the potential of the site and subsequent recommendation for rezoning there remain significant traffic and transport issues that will require resolution. Options in this regard will vary dependant on the specific uses that come forward and the associated traffic arising, its intensity and its potential interaction with existing and planned developments and importantly the TEN-T network. This issue is reflected in</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>settlement envelop at a gateway location; along a strategic road network; within an established area of commercial activity; compatible with 'Opportunity' Site zoning objective; no impacts of residential properties, bring regeneration benefits as a brownfield site; no heritage, archaeological or environmental designations; no flood risk or physical structures or constraints.</p> <ul style="list-style-type: none"> • Outlines that the site satisfies the sequential approach as it maximises existing infrastructure, is located within an established commercial area and not lead to leap-frogging. • Notes commonalities with Opportunity Site 3 (at the PSC) and suggest both should therefore be interpreted similarly. • Notes that Opportunity Site 1 at Revlin is remote from the town centre and more complex to deliver than the subject site. • Suggest that a cinema would be acceptable under the wording for Opportunity Site 1 and suggest wording of Opportunity Site 1 be revised as it would provide for a cinema and this is a 'rural' location and has the potential to compete with the town centre. • Note that if Opportunity sites 4 and 5 are developed the gravity of the town centre would shift eastwards and therefore enhance the merits of the lands the subject of the submission. 		<p>the recommendation below.</p> <p>The comments in the submission regarding the need for final mapping in the LAP to reflect planned expansion of the Lidl Foodstore are noted. The response and recommendation arising from submission DT16 address this matter including a recommendation to rezone the area for expansion to 'Established Development.' Submission DT16 and Proposed Material Alteration DTMA18 refer.</p> <p>The comments in relation to broad land uses types in respect of Opportunity Site 1 are noted. As discussed above, the role of the LAP is to define broad land uses groups. A consistent approach will apply to all 'Opportunity Sites' in the consideration of site specific development proposals that in principle fit with the policy framework in the LAP for the particular site.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA26' contained at the end of this section of the report from 'Local Environment' to 'Opportunity Site 9' and to amend the text accordingly as follows: <ol style="list-style-type: none"> (i) Insert additional text in chapter 9 at the end of section 9.5.3, page 124 to state as follows (new text in blue): <p>Opportunity Site 9: Drumloughagh adjacent to Lidl Foodstore The area comprises 2.7 hectares and is located to adjacent to the existing Lidl Foodstore, a single dwelling and an area of existing economic development. The lands are located on the eastern edge of the town and form the end point of an area of mixed use development types. The lands represent a gateway location that have</p>

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		<ul style="list-style-type: none"> The requested rezoning would contribute to the towns overall offer and competitiveness, support the tourism sector and improve quality of life for residents. State that planned investment in Lidl should be reflected in the mapping. 		<p>the potential for tourism, leisure and economic type developments that are more appropriate for edge of town activity and that do not conflict with the objectives for town centre regeneration. There are traffic and transport issues associated with the future development of this site and options in this regard will vary dependant on the specific uses that come forward and the associated traffic arising, its intensity and its potential interaction with existing and planned developments and importantly the TEN-T network. Policy DT-ED-5 refers.</p> <p>(ii) Insert an additional policy in chapter 9, at the end of section 9.5.4, page 125 to state as follows (new text in blue):</p> <p>Policy DT-ED-5: It is a policy of the Council to consider proposals on lands identified as Opportunity Site 9 for tourism, leisure and economic type developments; or for development providing for a combination of some, or all, of the aforementioned uses. Any proposed development types shall be required to demonstrate appropriateness as an edge of town activity and that will not conflict with the objectives of this LAP for town centre regeneration. In addition, any proposals for development shall address the traffic and transport associated with the future development of this site and options in this regard will vary dependant on the specific uses that come forward and the associated traffic arising, its intensity and its potential interaction with existing and planned developments and importantly the TEN-T network.</p> <p>This is a Material Alteration - Ref. DTMA26.</p>
DT25	Paul Doherty of Paul	Submission requests that the density of housing on site zoned PR4 be increased from	No	The densities relating to lands zoned 'Primarily Residential' in the Plan are identified as indicative only and are not provided in

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	Doherty Ltd on behalf of Colin Harvey	59 housing units to a minimum of 80 housing units to make the development of the site viable.		<p>order to constrain the potential of a particular site that would otherwise deliver a higher density development demonstrating sustainability, compatibility with surrounding land uses and their residential amenity and where proposals would not materially affect the Core Strategy of the relevant County Development Plan. This approach is provided for through policy GEN-H-10 on page 18 of the Draft Plan. In relation to the Core Strategy, it is proposed to adopt a monitor and manage approach which will consider the uptake of the Core Strategy and zoned lands on an ongoing basis.</p> <p>Recommendation: No change.</p>
DT26	Paddy Brogan	<p>Submission requests the rezoning of a site at Brookfield from 'Local Environment' to 'Residential' for the following reasons:</p> <ul style="list-style-type: none"> • Planning permission previously existed on this site (09/20436) but due to the economic downturn no works were carried out. • Site was previously zoned SRR in Donegal LAP 2005-2011 and later re-zoned as part of the CDP 2012-2018. • The site is serviced by DCC water and sewer. • The nearby Abbotts Ireland are creating an additional 200 jobs and there is a shortfall of housing. 	<p>Yes See separate folded map for Donegal Town (Map 6)</p>	<p>The land identified in the submission is located on a minor county road in the southern extremity of the plan area. Some multiple residential development has occurred in the area to the north known as Brookfield and it is noted that the site is close to the Gaelscoil and to a small infill area that is recommended for amendment to 'Primarily Residential' as a result of submission DT2. However, the identified lands are removed in location from the linear residential development that has occurred along Brookfield and a significant amount of undeveloped lands intervene the site and the core built up fabric of the town. Notwithstanding previous permission (for 4no. units) which is noted to have now expired, it is not considered appropriate to zone the lands in question as 'Primarily Residential' or 'Strategic Residential Reserve' as it would contravene the objective to grow Donegal Town sequentially and to build upon and maximise existing and future investment in infrastructure.</p> <p>Recommendation: No change.</p>
DT27	Jason Mc Clintock of Carr	Submission requests the rezoning of lands at Ballydevitt Beg, as delineated on attached	<p>Yes See separate</p>	<p>The lands identified in the submission are located along a county road in Ballydevitt Beg, north west of the Mill Park Hotel.</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	Architects on behalf of Michael Kelly and Liam Hyland.	map from 'Local Environment' to 'Strategic Residential Reserve' or 'Primarily Residential'.	folded map for Donegal Town (Map 6)	<p>The surrounding development in the area comprises linear one-off residential development surrounded by open and undeveloped fields. The site is removed from the existing core of built up form and significant undeveloped lands intervene it and the built up fabric. The Core Strategy housing requirement for Donegal Town has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Donegal Town in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Donegal Town and b) are more appropriately located in terms of the sequential growth of the town than the subject proposal. Therefore to rezone the land for either 'Primarily Residential' or 'Strategic Residential Reserve' would not be considered appropriate.</p> <p>Recommendation: No change.</p>
DT28	Paul Doherty of Paul Doherty Architects Ltd on behalf of Pat Britton & Co Ltd	<p>Submission requests that the 'Economic Development' zoning on lands at Lurganboy, near the Craft Village, have an amended policy that would include 'the acceptable use of Bulky Goods Retail' on these lands for the following reasons:</p> <ul style="list-style-type: none"> • Planning permission has recently been 	Yes See separate folded map for Donegal Town (Map 6)	The lands are located at Lurganboy within an area identified in the Draft Plan as 'Economic Development.' The lands are adjacent to Abbots Ireland, Cherrymore Kitchens, the existing enterprise centre, craft village and a number of other business enterprises. The zoning of the land as 'Economic Development' does not preclude the consideration of the principle of bulky retail goods at this location and any such proposal would be

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>granted to construct a 2 storey office building on the top of the site.</p> <ul style="list-style-type: none"> • Site was previously zoned for Industrial/ Commercial uses • Site history includes permission for light industrial and 1st floor offices, 03/1168; change of use from permitted to retail commercial use on ground floor, 07/20865 (permitted by An BP); permission for extension of duration of 07/20865, 12/50429 refers. • Similar adjoining uses exists (Cherrymore kitchens). • To apply flexibility for future uses of this site. 		<p>subject to the requirement of the Retail Planning Guidelines. A further amendment is therefore neither required nor considered appropriate.</p> <p>Recommendation: No change.</p>
DT29	Declan Mc Cabe of McCabe Architects on behalf of Ferm Engineering	<p>Submission requests that lands at Brookfield be zoned 'Economic Development' and provides the following additional information:</p> <ul style="list-style-type: none"> • Land is currently occupied by Fern Engineering, a local Mechanical and Electrical firm that employs 50 people fulltime in administration, electricians, engineers and general operatives. • Primary services provided by the company are electrical contracting, facility maintenance and renewable energy. • Previous planning permission on site included a commercial gym, in operation until 2012 • 2015 planning permission was granted for change of use to storage depot, in operation for a number of years. 	Yes See separate folded map for Donegal Town (Map 6)	<p>The lands in question are located in the Brookfield area and are identified as 'Established Development' in the Draft Plan. While the submission refers to permissions granted it is noted that the use on the site has incrementally intensified via planning permission for change of use from agricultural storage to gym, followed by retention of storage depot associated with engineering business. In January 2017, permission was refused (16/50847) for the construction of a storage shed and office building on grounds of its location in an non-industrial/business area, that it would be injurious on adjoining amenities and on the rural nature of the host landscape, access arrangements and vision lines and, set back from the public road. Having regard to the recent refusal of planning permission and to the limited size of the lands, location in a distinctly rural area of the town and disjointed from the existing urban fabric of the town and existing clusters of employment areas, it is not considered appropriate to rezone the lands as 'Economic Development.' Rather it is considered reasonable to continue the identified</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<ul style="list-style-type: none"> Firm engineering intend to lodge and application for a further storage facility, stating it is vital for the day to day running of the business. State that rezoning will allow centralizing activities in one site and safeguard jobs. State that the proposal will contribute significantly to the sustainable development of Donegal Town. 		<p>'Established Development' zoning which may provide for reconfiguration as appropriate subject to satisfactory scale, intensity and access and traffic safety arrangements.</p> <p>Recommendation: No change.</p>
DT30	Enda Nolan	<ol style="list-style-type: none"> Submission suggests that the Council offer the proprietor of the 'Red Shed', McPhilemy's Furniture, to relocate to the Council's land at Drumlonagher and be given a purpose made factory because the building is an eyesore, the location does not suit a business that carries large goods, lack of car parking and it is situated on a lawned area that could be landscaped into a recreational area for locals and visitors. Submission suggests that murals should be painted on available wall spaces such as the owners of the Reel Bar, Doherty's Fishing Tackle and Mc Garrigles Picture Framing, Quay Street. Suggests the Council should approach such property owners to discuss. Makes reference to Esteponia in Spain as an example. 	No	<ol style="list-style-type: none"> The building described as the 'Red Shed' is in private ownership as noted in the submission and to some extent is, in itself a landmark and notable structure en-route into the town centre. In any case, the acquisition of the building in question through public funds is not considered as a priority regeneration scheme in the town. Furthermore, such a proposal is not with the remit of the plan for delivery. <p>Recommendation: No change.</p> <ol style="list-style-type: none"> The suggestion in relation to murals is considered to have merit in terms of a potential regeneration project but in itself is not with the remit of this land use plan. <p>Recommendation: No change.</p>
DT31	Jim Harley of Harley Planning	The submission requests the rezoning of lands at Doonan from 'Local Environment' to 'Residential' and provides the following	Yes See separate folded map for	The planning history in relation to the subject site is noted together with the commencement works undertaken on site. Notwithstanding zonings in the previous Local Area Plan, the

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
	<p>Consultants Ltd on behalf of Longmarsh Development Ltd.</p>	<p>supporting information:</p> <ul style="list-style-type: none"> • Outlines extensive planning history for the lands including permission granted in 2006 for 49 no units and treatment plant; permission consequent granted in 2007 and Extension of Duration granted in 2012 to extend to 10th June 2017 • Outlines the core strategy of the Draft CDP as well as the content of the Donegal Town settlement strategy including a policy providing for a single access point on the northern side of the N56. • Outlines the methodology undertaken to identify residential lands in the Draft LAP and states that the lands zoned in the draft plan, apart form PR4 have had no previous planning permissions and therefore could not have been selected on evidence that they would be of genuine interest to developers. • Outlines doubts that the 'monitor and manage' approach will be implemented as the approach has not been implemented to date. • States that the lands are serviced in infrastructural terms at present under previous permission granted. • States that the developer is a renowned builder and will deliver housing. • States the lands are relatively close to the town centre and are as sequentially close as any other zoned lands. 	<p>Donegal Town (Map 6)</p>	<p>lands in question are considered to be located at a substantial distance from the core fabric of the town and large areas of undeveloped land intervene the site in question and the town. The Core Strategy housing requirement for Donegal Town has been identified as being 21Ha of residential land. In preparing the Draft LAP, the Planning Department undertook an exercise to identify the most appropriate sites for new housing development in Donegal Town in the short to medium term, taking into consideration factors such as distance of the lands from the town centre, flooding issues, compatibility with adjoining uses, accessibility, servicing, visual vulnerability and the presence of sites of conservation importance. In this context, it is considered that the housing opportunities identified in the Draft LAP and as otherwise identified through assessment of the submissions received in response to the Draft LAP both a) provide for an adequate quantum of lands in terms of meeting the Core Strategy allocation in the County Development Plan for Donegal Town and b) are more appropriately located in terms of the sequential growth of the town than the subject proposal.</p> <p>As a result and notwithstanding the previous planning permission, the site is not considered as a preferred location for new multiple development and its zoning as 'Local Environment' in the Draft LAP reflects the objectives to develop Donegal Town outwards from the core. Furthermore, the modest site development works undertaken at this location are not considered to constitute an unfinished estate.</p> <p>In relation to policy for the resolution of unfinished estates, it is considered that, Draft LAP identifies policy UB-P-17 of the Draft CDP as a relevant county level policy. Given the importance of this policy, it is considered appropriate to restate it within the general housing policies of the LAP as outlined in the recommendation below. This is considered to be a measure of</p>

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<ul style="list-style-type: none"> States that the lands consist of an unfinished residential development and should be given the benefit of emerging policy UB-P-19 in the draft CDP and therefore designated as an 'unfinished Housing Scheme' designation or zoned as 'Residential.' 		<p>clarification and therefore is not a material change.</p> <p>Recommendation: Amend the Draft LAP so as to insert an additional general housing policy at chapter 3, section 3.5.3, page 18 as follows (new text in blue):</p> <p>GEN-P-11: It is the policy of the Council to consider proposal for urban residential development that seek to resolve existing unfinished residential development, including through appropriate reconfiguration of developments, and such proposals shall be considered outside the population targets set by the core strategy.</p> <p>This is Non-Material Alteration- Ref. GENNMA14.</p>
PRESCRIBED BODY SUBMISSIONS				
PB5	Transport Infrastructure Ireland	<ol style="list-style-type: none"> Submission notes Opportunity sites 1, 2 and 3 are close to or adjoin national road network and junctions. Welcome Policy DT-ED-1 in relation to the Opportunity Site 1 (Revlin) that the proposed development will be required to demonstrate no negative impact on the capacity or safety of the N56. States also that any proposed works at the N56 should conform to TII design standards and be subject to consultation with the Authority. And proposals should be complementary to safeguarding the strategic function of the national road. 	No	<ol style="list-style-type: none"> Comments noted. and 3: the comments of TII are noted and it is agreed that the protection of the strategic function of national roads is critical. The approach in the LAP is structured so as not to duplicate the overriding objectives and policies of the relevant County Donegal Development Plan with particular reference to ensuring compliance with the most up-to-date iteration in the form of the Draft CDP 2018-2024. This approach is outlined in section 1.3 of the Draft LAP. It is noted that Policy T-P-8 of the Draft CDP 2018-2024 requires Traffic and Transport Assessment and a Road Safety Audit for any development proposing access to the Strategic Road Network. This policy is reiterated in Appendix A of the Draft

Ref	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>3. States that in relation to all 'Opportunity Sites' at such locations, proposals should be accompanied by a Traffic and Transport Assessment in accordance with the TII Traffic and Transport Assessment Guidelines (2014) and a road safety audit should be undertaken where relevant. State that TII would welcome this matter being provided for in the LAP.</p>		<p>LAP.</p> <p>Recommendation: No change.</p>
PB6	Irish Water	<p>1. State the figures in table 2.2 are mixed up in relation to Donegal Town and Killybegs.</p> <p>2. Suggest replacing the words 'wastewater network' with 'wastewater infrastructure in section 2.1.2.</p>	No	<p>1. Table 2.2 correctly states the current and projected population for Donegal Town and Killybegs.</p> <p>Recommendation: No change.</p> <p>2. Noted and agreed as a non material alteration.</p> <p>Recommendation: Replace the words 'wastewater network' with 'wastewater infrastructure in section 2.1.2, page 8 of the Draft LAP</p> <p>This is Non-Material Alteration - Ref. DTNMA1.</p>

TEXT ASSOCIATED WITH REF. DTMA8

Proposed Material Alteration - Ref. DTMA8

To make consequential amendments to the text of the Draft Plan in order to reflect the consequential supply of lands zoned for housing by amending chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out below:

9.6.2 Methodology for the Identification of Housing Lands

In order to identify the 21 hectares of residential land required in Donegal Town, an analysis of available lands within the defined plan boundary and their suitability for residential development was undertaken. The criteria used in the analysis included, inter alia, – distance of lands from the town centre; compatibility with adjoining land uses; flood risk; the presence of sites of conservation importance; serviceability in relation to wastewater and water; accessibility and visual vulnerability as examples. Arising from this assessment the most suitable lands for housing within Donegal Town are made up of a combination of lands zoned ~~8 sites identified as~~ ‘Primarily Residential.’ ~~and part of 1 other area of land which is identified as ‘Opportunity Site 1’ and which has the potential for mixed use development including an element of residential land uses.~~ Table 9.1 shows that a total of ~~22~~ **23.5** hectares of land in Donegal Town is provided through the identification of ‘Primarily Residential’ lands, with capacity to deliver circa to ~~263~~ **282** residential units ~~while a total of circa 5 units are targeted for delivery through Opportunity Site 1.~~ As shown in chapter 2 of this LAP, the level of land supply in Donegal Town for the purposes of residential development is broadly consistent with the Core Strategy of the Draft CDP.

Extract of Table 9.1 from the Draft LAP 2018-2024: Total Lands Identified to Meet Residential Housing Need in Donegal Town

Site Ref	Zoned as ‘Primarily Residential’ or ‘Opportunity Site.’	Area of site (ha)	Potential number of housing units to be delivered
PR1	Primarily Residential	0.2	2
PR2	Primarily Residential	1.2	14
PR3	Primarily Residential	3.9	47
PR4	Primarily Residential	4.9 4.6	59 55
PR5	Primarily Residential	5.1 4.6	61 55
PR6	Primarily Residential	6.7 6	80 72
PR7	Primarily Residential	0.5	7
PR8	Primarily Residential	2.5	30
Total ‘Primarily Residential’		22 23.5	263 282
OPP1	Opportunity Site	6.6 (Part of)	5
Total ‘Opportunity Site’		6.6 (Part of)	5

9 KILLYBEGS SUBMISSIONS

9.1 Overview

A total of 838 submissions were received from members of the public.

One submission commenting specifically on the contents of the LAP as it relates to Killybegs was received from a prescribed body, namely the Department of Agriculture, Food and the Marine.

9.1.1 Public Submissions

Of the 838 submissions received in relation to Killybegs, 757 referred specifically to the future development of the St. Catherine's Well area and the immediately adjoining harbour complex. 721 of these submissions were in support of the zoning proposals presented in the Draft LAP whilst 36 were against the draft zoning. Summaries of the respective arguments 'for' and 'against' the draft zoning proposals concerning the St. Catherine's Well/Harbour area are set out in Table 9.1 below, together with the Chief Executive's response. Names of the parties that lodged a submission in relation to this issue can be found at Appendix C of this report.

Another issue that attracted a large number of submissions (36 in total) is the site on the Fintra Road identified on the Land Use Zoning Map by the notation 'SRR' (Strategic Residential Reserve). This issue is dealt with at Table 9.2.

Most of the remaining issues raised in the submissions including, inter alia, matters relating to housing, traffic and accessibility, community and amenities, tourism, commercial and economic development, flooding and site specific zoning requests are addressed in Table 9.3. However, a final group of submissions is addressed in Table 9.4. These latter submissions were so general in nature that it was not possible to provide a meaningful response.

9.1.2 Prescribed Bodies

The Department of Agriculture, Food and the Marine made a submission in relation to the Harbour centre/St. Catherine's Well area issue and this is addressed in the aforementioned Table 9.1 below. No other Killybegs-specific comments were received from Prescribed Bodies/Environmental Authorities

9.1.3 Stage 2 Strategic Flood Risk Assessment

The Council engaged a firm of consulting engineers to prepare a Stage 2 Strategic Flood Risk Assessment in respect of the seven towns covered by the Local Area Plan. The Flood Report has raised a number of issues in Killybegs that are required to be addressed in this Chief Executive's Report.

Firstly, a strip of land along the eastern boundary of the area zoned 'Community' in Killybegs has been identified as being potentially at risk of flooding and accordingly it is considered prudent that this area of land be rezoned to 'Recreation and Amenity'. In addition, Opportunity Sites 1-4 have been noted to be potentially at risk of coastal flooding and consequently it is recommended that policies in relation to these sites be amended such that prospective developers will be required to examine and address flood risk in the design of developments. These issues are addressed in the recommendations below.

Recommendation:

1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA1' contained at the end of this section of the report such that a small part of the 'Community' zoning is amended to 'Recreation and Amenity'.

This is a Material Alteration – Ref. KBMA1.

2. Amend the wording of Policy KB-TC-1 as follows (new text in blue):

"It is a policy of the Council to consider proposals for the development of harbour-related, commercial or tourism-related uses on Opportunity Site 1, or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. All proposals for development on Opportunity Site 1 must fully address any potential safety issues at this waterside location and must fully address all flood risk issues".

This is a Material Alteration – Ref. KBMA2.

3. Amend the wording of Policy KB-TC-2 as follows (new text in blue):

Policy KB-TC-2 "It is a policy of the Council to consider proposals for a mix of town centre compatible uses on Opportunity Sites 2, 3 and 4 subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals for standalone residential development will not be considered. Development proposals on these sites must be designed to fully address the harbour setting and must demonstrably contribute towards the regeneration and revitalisation of the town centre. Development proposals must also be designed to address all potential flood risk issues".

This is a Material Alteration – Ref. KBMA3.

9.1.4 Proposed Outer Relief Road

Due to a mapping error when publishing the Draft LAP for public consultation, the route of the proposed Outer Relief Road for Killybegs was inadvertently omitted from Map No. 7, Killybegs. Accordingly, it will be necessary to correct the map and show the proposed route. The text in the document relating to the provision of the relief road has not been affected.

Recommendation:

Amend Map No. 7 (Killybegs) of the Draft Local Area Plan to show the route of the proposed Outer Relief Road and amend the map legend accordingly.

This is a Material Alteration – Ref. KBMA4.

Table 9.1: St. Catherine's Well Area / Immediately Adjoining Harbour Complex**Summaries of Submissions in Support of, and Against, Draft LAP Zoning (Refer to Appendix C for names of parties that lodged submissions)**

Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Department of Agriculture, Food and the Marine Submission	Response and Recommendations Arising
<p>The submissions are broadly supportive of the Killybegs LAP in that they agree that the land adjacent to St. Catherine's Well/Graveyard/Kits Castle should be zoned Amenity/Open Space and Visually Vulnerable and further agree that St. Catherine's Well and the Archaeological/Heritage areas of Killybegs should be protected and remain free of any future growth with no buildings. The reasons given in the submissions include the following;</p> <ul style="list-style-type: none"> • Preservation of natural amenity/open space • Historical interest importance/relevance • Protection of scenic beauty • Sacred/Religious/Spiritual importance • Heritage value <p>The submissions are supportive of the Killybegs Draft Plan and request</p>	<p>The submissions request a change to the Draft Land Use Zoning Map for Killybegs such that the extent of the area to be zoned reverts to that which was shown in the previous LAP as 'Port/Harbour related' activities.</p> <p>The submissions contend that all lands within the Fishery Harbour Boundary should be designated for harbour/Port Activities.</p> <p>The submissions question why there is a proposed change from 'Public Amenity' near St. Catherine's Well to 'Visually Vulnerable' and contend that there is an error in the extent of the proposed 'Open Space/Amenity' designation as an area under this proposed designation has been already developed for port related use.</p> <p>The submissions state that it is vital that coastal lands adjacent</p>	<p>The Department of Agriculture, Food and the Marine submission notes that the Killybegs Fishery Harbour Centre is one of six designated Fishery Harbour Centres that are owned, managed and maintained by the Department. The submission raises concerns that a site within the Fishery Harbour Centre and immediately adjacent to the fire station, which is being proposed for designation as 'Amenity/Open Space', will impinge on the ability of the Department to manage the Fishery Harbour Centre appropriately. The Department submission notes that the site in question is reclaimed foreshore owned by the Department and is earmarked for commercial use in keeping with harbour activities and to benefit the economic viability of the Fishery Harbour Centre generally. The submission states that Killybegs Fishery Harbour Centre is a busy working harbour and contends that a proposal for</p>	<p>The St. Catherine's Well area of Killybegs is undoubtedly one of the key heritage sites in the town, due to its archaeological, cultural and religious significance, its open space and amenity value and its historical importance. Similarly, the commercial harbour area is of utmost importance given that it is a central element of the economic functioning of the town, is the basis for significant employment in the area and indeed contributes hugely to the sense of place and character within Killybegs.</p> <p>The development of the St. Catherine's Well/Harbour area has proven to be the most prominent issue arising from the public consultation exercise undertaken in respect of the Draft Local Area Plan (LAP). Of the 838 submissions received in relation to Killybegs, 757 related directly to the future development of the St. Catherine's Well area and the immediately adjoining harbour complex. 721 of these submissions were in support of the zoning proposals presented in the Draft LAP – i.e. these submissions essentially request that the 'Recreation and Amenity' zoning presented</p>

Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Department of Agriculture, Food and the Marine Submission	Response and Recommendations Arising
<p>that the area of St. Catherine's Well/Graveyard is protected as proposed.</p>	<p>the harbour are designated to complement off shore development.</p> <p>The submissions state that lands inside the boundary of the Fishery Harbour Centre together with adjacent lands should be zoned as 'Harbour/Port Activities'.</p> <p>A concern is raised that the extent of the proposed 'Amenity/Open Space' designation will impinge upon the development and functioning of the Fishery Harbours Centre.</p>	<p>'Amenity/Open Space' at the entrance/exit of such a busy commercial harbour would not only have serious operational implications but also significant public safety risks. As a consequence, the Department states that it is not in a position to support this aspect of the Draft Plan and is of the view that the area designated as 'Port/Harbour Related Activities' should be extended to cover the site in question. The Department submission also notes that there are areas of land adjacent to the new harbour development at Smooth Point that are proposed to be designated as 'Amenity/Open Space' and states that this proposed designation may cause the Department similar concerns.</p>	<p>in the published Draft LAP be retained in the finalised document. The reasons for supporting the zoning proposals contained in the Draft LAP broadly refer to (a.) the need to preserve the natural amenity and open space value of the area, (b.) the historic importance of the area, (c.) the need to protect the scenic amenities of the area, (d.) the religious importance of the site and (e.) the heritage value of the area.</p> <p>36 submissions have been received that do not support the zoning presented in the Draft LAP and request that all lands within the boundary of the Fishery Harbour Centre as well as adjacent lands to the south of the Harbour Centre, be zoned as 'Harbour/Port Activities'. These submissions contain a shared reasoning as to why the zoning in the Draft LAP should be amended. In broad terms, the submissions contend (a.) that Killybegs Harbour has been the key point of many large projects in the northwest region; the importation of wind turbine components being cited as an example and (b.) that the uncertainty around Brexit and how it may affect fisheries and marine freight traffic requires every effort to be made to safeguard and enhance opportunities for Killybegs to develop, centred on the fisheries and marine sector industries. The submissions note the strategic vision for Killybegs as outlined in the LAP which is to, inter alia, 'strengthen</p>

Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Department of Agriculture, Food and the Marine Submission	Response and Recommendations Arising
			<p>the strategic importance of Killybegs as a fishing port' and further note that the fundamental economic importance of the fishing/fish processing industries and port-related activities to Killybegs are recognised in the Draft LAP.</p> <p>The arguments 'for' and 'against' the zoning of the St. Catherine's Well area, as presented in the Draft LAP, are all considered to have merit. There can be no question that the protection of St. Catherine's Well, the ruins of St. Catherine's Church and Cat's Castle and the associated curtilage of these structures, must be a central element of any Local Area Plan for the town. There can also be no question as to the importance of Killybegs Harbour in terms of the future commercial development of the town and indeed wider area. In light of the foregoing, it appears clear that the most appropriate course of action in relation to this issue is to attempt to strike a balance between the preservation of the Well and provide for the sustainable expansion of Killybegs Harbour. In this respect, it is considered that the proposals presented to Members on 25th September 2017 as part of the 'Working Draft' Seven Strategic Towns Local Area Plan 2018-2024, which retained a significant 'Recreation and Amenity' zoning around the St. Catherine's Well area, but which at the same time provided for an extension to the</p>

Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Department of Agriculture, Food and the Marine Submission	Response and Recommendations Arising
			<p>western side of the 'Port/Harbour Related Activities' zoning, would serve both to recognise and protect the amenities of this important area of archaeological, historical and religious significance, whilst at the same time allow for the sustainable expansion of harbour related commercial activities in the town.</p> <p>Recommendation: To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA5' contained at the end of this section of the report such that the 'Recreation and Amenity', 'Visually Vulnerable' and 'Port/Harbour Related Activities' zonings be amended to reflect those zonings presented to Members on 25th September 2017.</p> <p>This is a Material Alteration – Ref. KBMA5.</p>

Table 9.2: Submissions in relation to proposed Strategic Residential Reserve Zoning on Fintra Road (Refer to Appendix E for names of parties that lodged submissions)

PUBLIC SUBMISSIONS		
Submissions in relation to proposed Strategic Residential Reserve (SRR) zoning on Fintra Road		
Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Response and Recommendations Arising
<p>1. The submissions seek to retain the 'Strategic Residential Reserve' zoning on the Fintra Road, as contained in the Draft LAP.</p> <p>2. It is contended that the lands in question are suitable for single dwellings or a small development.</p> <p>3. Queries are raised in relation to the previous 'amenity' zoning in the Killybegs LAP 2008-2014 and it is contended that the SRR zoning would allow for development that would be consistent with the established pattern of development in the area.</p>	<p>1. The submissions request that the lands zoned SRR on the Draft LAP map be zoned 'amenity', for the following reasons -</p> <p>a. Traffic safety – it is suggested that any additional residential development in this location would have impacts on traffic in the area and would adversely impact the substandard road network (specifically the L1355), which is deficient in terms of junction safety, sight distance, pedestrian safety and public lighting. The submissions note that the L1355 forms part of the Wild Atlantic Way and thus will continue to be subject to increased volumes of traffic.</p> <p>b. Services – it is contended that water pressure in the area would be adversely impacted by additional residential development; concerns exist re. the ability to adequately collect and dispose of surface water, giving rise to concerns re. flooding in area. It is suggested that a 'storm plan' would need to be prepared prior to any development of the subject lands. Concerns also exist in relation to the capacity of the sewerage infrastructure serving the area.</p> <p>c. It is suggested that development of this land should be in keeping with the surrounding area, which is predominantly one-off/low density housing.</p>	<p>1. The contents of all submissions have been noted and considered. Following further analysis and deliberations however, it is considered that this site may provide an opportunity for low density residential development rather than being held back as 'Strategic Residential Reserve' lands. This site of approximately 2 hectares is located on the Old Fintra Road, between existing housing developments to the east and west. Public services (water and sewer) are available in the locality and the Area Water & Environment Office has advised that there will be no capacity issues regarding these services in this area.</p> <p>A number of public submissions make reference to the inadequacy of the local road network. However, the Area Roads Office has advised that a Local Improvement Scheme (LIS) is to be carried out on the private road to the immediate northwest of the site, over to the junction with local road L-1265-1, and taken together with road upgrade works to the immediate north of the site (which would be a policy requirement), it is considered that a suitable means of vehicular access could be provided to the site.</p> <p>A number of public comments have been received in relation to the inadequacy of local drainage</p>

PUBLIC SUBMISSIONS		
Submissions in relation to proposed Strategic Residential Reserve (SRR) zoning on Fintra Road		
Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Response and Recommendations Arising
	<p>d. The submissions note that there is a recorded monument on the Old Fintra Road, referred to as 'Stoney Batter' (ref. DG097-011 No. 4 Court Tomb). It is suggested that retaining the subject lands as open space/amenity would help to ensure the monuments future preservation.</p> <p>e. It is contended that there is a wildlife habitat in this area. The submissions note that the Planning & Development Act requires that the County Development Plan include a number of statutory objectives including the conservation and protection of such environments.</p> <p>f. Concerns are raised in relation to potential impacts on adjoining properties that might arise if this land was to be developed for residential purposes - e.g. overlooking, subsidence, impacts caused by construction traffic, disposal of construction and demolition waste.</p>	<p>networks in this area. However, the Area Roads Office has advised that development of this site would not prove problematic in this regard, subject to the installation of suitable storm water attenuation systems. Certain public submissions have also noted the existence of historical monuments in the locality. These comments are noted. However, there are no features of this nature mapped within the subject site itself. Furthermore, the site is not located within an area indicated as being of nature conservation importance.</p> <p>Having regard to the strategic position of this site in terms of its proximity to the town centre, it is considered that these lands present an opportunity for the development of low density housing that would serve to further consolidate the residential population of Killybegs and that would offer residents ease of access to all local amenities and services.</p> <p>Recommendation:</p> <p>1. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA6' contained at the end of this section of the report from 'Strategic Residential Reserve' to 'Low Density Residential' and label the area as 'LDR'.</p> <p>This is a Material Alteration – Ref. KBMA6.</p>

PUBLIC SUBMISSIONS		
Submissions in relation to proposed Strategic Residential Reserve (SRR) zoning on Fintra Road		
Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Response and Recommendations Arising
		<p>2. To make consequential amendments to the text of the Draft Plan as follows (in order to reflect the supply of lands zoned for housing):</p> <p>(i.) To amend chapter 10, section 10.6.2 and table 10.1, page 144 so that it reads as set out in the text at the end of this section of the report.</p> <p>This is a Material Alteration – Ref. KBMA7.</p> <p>3. To make consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p>(i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;</p> <p>(ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.</p> <p>This is a Material Alteration – Ref. GENMA1.</p> <p>4. Arising from the foregoing, it is recommended that a new policy be inserted into the Draft LAP to read as follows:</p> <p>Policy KB-H-4: “It is a policy of the Council to consider proposals for Low Density Residential development (maximum of 8 residential dwellings per hectare) on the site denoted LDR on Map No.</p>

PUBLIC SUBMISSIONS		
Submissions in relation to proposed Strategic Residential Reserve (SRR) zoning on Fintra Road		
Generalised Summary of Submissions in Support of Draft LAP Zoning	Generalised Summary of Submissions Against Draft LAP Zoning	Response and Recommendations Arising
		<p>7 of this LAP. All proposals for development of this site must make provision for, inter alia (a.) access via the northern end of the site (b.) the upgrade and widening of the existing road along the northern site boundary, (c.) the installation of pedestrian footpaths that link the site with existing pedestrian footpaths in the locality, (d.) the installation of appropriate public lighting within the site and along the widened roadway to the north of the site and (e.) the installation of appropriate storm water attenuation systems on site. All proposals for development on this site must otherwise comply with all other relevant policies of this LAP. "</p> <p>This is a Material Alteration – Ref. KBMA8.</p>

Table 9.3: Other Specified Issues Raised during Public Consultation Process

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
Submissions in Relation to Other Specified Issues				
KB1	Derek Vial, Killybegs History and Heritage Committee	<p>1. National Monuments should be detailed on the 'inset' map for Killybegs, in addition to being detailed on the main map.</p> <p>2. The 'visually vulnerable' layer on the Killybegs map (around St. Catherine's Well) is difficult to discern from the amenity zoning - it should be made clear on the legend that these lands are <i>both</i> visually vulnerable and zoned for amenity</p> <p>3. The lake adjacent to the proposed Biomarine facility is currently zoned 'industrial' but should be zoned amenity as it is the only lake in the town.</p>	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>1. Noted and agreed.</p> <p>Recommendation: Identify the monuments on the inset map for Killybegs as well as the main map.</p> <p>This is Non- Material Alteration – Ref. KBNMA1.</p> <p>2. Noted and agreed.</p> <p>3. Noted. The lake in question should be retained as a valuable visual amenity in the area.</p> <p>Recommendation: It is recommended that the text of Policy KB-ED-1 be amended as follows (new text in blue):</p> <p>"It is a policy of the Council to consider proposals for appropriate new commercial developments, including industrial uses, (or proposals for extensions to or redevelopment of existing commercial/industrial uses) on lands zoned 'Economic Development' on the accompanying land-use zoning map (see Map 7), subject to compliance with all relevant policies of this Local Area Plan. Any development proposals located in close</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>proximity to the existing lake within the area zoned Economic Development must be designed and configured so as to preserve the visual amenities of the lake and its immediate environs".</p> <p>This is a Material Alteration – Ref. KBMA9.</p>
KB3	Arthur Kee	A concern is raised in relation to the Council zoning lands for residential purposes without indicating that the lands may be split between various landowners. (NB - The lands subject of this submission are zoned PR6 in Killybegs. This came to light during the public drop-in event in Killybegs, when the correspondent explained the situation regarding the lands as he saw it).	Yes See separate folded map for Killybegs (Map 7)	<p>The Primarily Residential zonings are intended to indicate the most appropriate location for new housing development within the town. Land ownership is not directly relevant to this issue. The effectiveness of the supply in terms of delivering residential development will be monitored during the life of the Plan.</p> <p>Recommendation: No change.</p>
KB5 (1.)	Gary Anderson	Very keen to see the regeneration of the town centre as a priority in the LAP.	No	<p>Noted. This objective is shared by the Council and is reflected in the strategy and detailed policies of the Plan for Killybegs.</p> <p>Recommendation: No change.</p>
KB131 (9.)	Killybegs History and Heritage Committee	Submission notes that there are many sites of archaeological importance that are not presently visible but where special attention needs to be paid, e.g. the site of Mooney Boats (Castle Point).	No	<p>Noted. The Environment and Heritage policies of the LAP will serve to protect areas of archaeological importance where they exist.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB132	Derek Vial	Submission contains 3 poly pockets of photographs depicting Killybegs (linked to submission KB131 above, although not referred to explicitly).	Yes See separate folded map for Killybegs (Map 7)	Noted. Recommendation: No change.
KB138	Gary Rogers	<p>1. Proposes that 2 acres/0.809 hectares along the 'industrial road' be rezoned from industrial to low density housing. It is contended that this would allow for the orderly development of additional residential units in an area that is fully serviced and would prevent industrial uses being located in close proximity to a long established residential area.</p> <p>2. The site is more suited for low density housing than industrial uses due to (a.) its location along the WAW, (b.) its proximity to an existing housing development pattern similar to what is being sought for the 2 acres.</p> <p>3. The proposal would allow for a suitable distance or buffer between existinh housing along the Fintra Road and the proposed industrial zoning.</p> <p>4. The LAP should allow for a masterplan approach to the site, with an agreed access servicing both industrial and residential uses within the lands.</p>	Yes See separate folded map for Killybegs (Map 7)	<p>1-4. The lands subject of this submission are located within an area zoned as 'Economic Development', along the northern end of the Industrial Road in Killybegs. The Council has invested heavily in the construction of this roadway which in turn provides Killybegs with an ideal location for industrial and commercial enterprise and which serves to further the economic development objectives for Killybegs. The proposal to change the zoning of 2 acres of land to allow for low density housing would be likely to conflict with industrial uses in the locality and therefore the proposed zoning change may seriously compromise the future development potential of the remaining lands for commercial and industrial purposes. With regard to the proposal for an additional vehicular entrance to the subject lands, the Area Roads Office has advised that the existing Industrial Road access points have been specifically designed to meet with all relevant technical standards and have noted that the addition of a further entry/exit point along the road could erode the carrying capacity of the route. It should be noted that the proposed zoning in the Draft LAP is generally consistent with that set out in the Killybegs LAP 2008-2014.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB142	Derek Vial	<p>1. The submission states that the town's shopfronts should be respected.</p> <p>2. Historic Town must secure the primacy and importance of this heritage factor in planning and objectives with Killybegs</p> <p>3. Both Plantation and medieval quarters will help Killybegs to be the 'Kinsale' and Dingle of the North-West.</p>	No	<p>Noted. Policy TV-P-7 of the Draft CDP 2018-2024 (which will also apply to the LAP) requires the provision of high quality shopfronts.</p> <p>2-3. Noted – the policies and objectives of the LAP will operate to protect important heritage features within the town (natural, built and archaeological). Sections 10.1 and 10.9.1 of the LAP specifically note the richness of the heritage assets in Killybegs whilst Objective KB-EH-1 states that it is an objective of the Council to protect important natural, built and archaeological heritage environments within Killybegs. In addition, Policy KB-EH-1 provides specific protection for the identified zones of archaeological potential within the town.</p> <p>Recommendation: No change.</p>
KB144	Derek Vial	<p>1. The submission states that all new estates should have different size units from single occupancy to large families as this will progress within their own area and negate 'one off housing'</p> <p>2. Incentives should be used for Town Centre Living in the Central Business District and</p>	No	<p>1. Noted and agreed. This matter will be addressed via the Development Management process and is explicitly supported by Policy UB-P-11 of the Draft County Development Plan, which provides that "Proposals for residential development shall 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 Council will seek to achieve a balance of housing stock to meet the needs and aspirations of the people residing within the Plan area."</p> <p>Recommendation: No change.</p> <p>2. Noted – this matter is generally outside the scope of the LAP but is addressed in a broad sense in the Government's 'Rebuilding Ireland – Action Plan for Housing and</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		Core Areas (Above shop living)		Homelessness', to which the Council will have full regard. Recommendation: No change.
KB145	Derek Vial	The Lake Area at Greenhills Industrial Estate is valuable to the town as this is the only lake in the immediate environs and can be developed for recreation, nature and amenity.	Yes	Refer to recommendation above for Material Alteration Ref. KBMA9 (submission ref. KB1[3])
KB146	Derek Vial	The submission states that the old trackway through the town centre, churchill and down to Drumbeigh and up to Blakes Farm could be a possible cycleway route with the consent of the landowners and would add to the towns heritage. The submission states that they would work with the council to make this achievable.	No	<p>The Draft LAP already 'seeks to facilitate appropriate tourism opportunities and ensure the development of a high quality townscape, inclusive of pedestrian and cycleways. Related to this issue, the Greenways Officer identified 21 potential greenway developments for the County in the Addendum to the Chief Executives Report of October 2017 to be included as non-material amendments to the Draft CDP 2018-2024, including Donegal Town-Killybegs.</p> <p>Recommendation: Include a new objective and policy in the Draft LAP to support the potential development of greenway/walkway/cycleway projects in Killybegs as follows:</p> <p>Objective KB-TMR-2: "It is an objective of the Council to support the potential development of new greenway/walkway/cycleway projects in Killybegs."</p> <p>Policy KB-TMR-5: "It is a policy of the Council to protect established/historic railways in Killybegs to develop a network of green infrastructure for potential greenway/walkway/cycleway projects and for recreational development as an important part of the tourism product of the town."</p> <p>This is a Material Alteration – Ref. KBMA10.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB281 (2.)	Sarah Smith	Submission notes that dereliction is a problem for the town. No need to spread the town boundary.	No	<p>Noted. The Core Strategy of the Draft County Development Plan, 2018-2024 and the Draft LAP identifies a very clear and strong focus on the regeneration of our towns and villages across the County, including Killybegs, whilst also facilitating appropriately-scaled expansion(s) where such strategic growth decisions are warranted.</p> <p>Recommendation: No change.</p>
KB285	Karen Devine	<p>1. The submission requests free parking in the council yard and the shore road.</p> <p>2. Hotels should provide their own parking</p> <p>3. The submission request new developments should adhere to proper</p>	No	<p>1. Noted. The need for additional car parking in Killybegs is being reviewed on an ongoing basis and the Council will continue to explore all reasonable options for additional car parking in the town.</p> <p>Recommendation: No change.</p> <p>2. Noted – the County Development Plan sets out car parking standards for new developments. However, in considering requirements for car parking, the Council will also have regard to, inter alia, the accessibility of a given location, the availability of public parking in the area, the potential for dual use of spaces (i.e. the space serves one particular use during the day and another in the evening) and situations where the exercise of flexibility would assist in the conservation of the built or natural heritage, would aid the renewal of areas in need of regeneration, would facilitate a better quality of development or the beneficial reuse of an existing building.</p> <p>Recommendation: No change.</p> <p>3. Noted – it is an objective of the LAP (Objective KB-EH-1) to “protect important natural, built and archaeological heritage environments within Killybegs” and new developments will be</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>design stanards for HERITAGE Towns</p> <p>4 . Main Street should be surfaced using cobble stone</p>		<p>assessed in this context. In addition, the Draft 2018-2024 contains a suite of policies designed to protect the built heritage of towns and villages and these are all fully applicable within Killybegs.</p> <p>Recommendation: No change.</p> <p>4. This suggestion is noted. Section 10.4.1 of the LAP sets out the Council's ambitions in terms of town centre regeneration within Killybegs, supported by Objective KB-TC-1 and Action KB-A-1, and proposals for resurfacing of the Main Street will be considered in this context.</p> <p>Recommendation: No change.</p>
KB368	Thomas McBrearty	The footpaths in the town need to be addressed.	No	<p>Noted. However, the LAP is a strategic policy document – matters relating to the need for footpath repairs/replacement are more appropriately dealt with through the Area Roads Office and Municipal District committee.</p> <p>Recommendation: No change.</p>
KB450 (2.)	Joan Cunningham	The submission states that they do not agree with any more commercial buildings on Church Road.		<p>Submission noted. All development proposals will be assessed in light of the relevant policy provisions of the LAP and County Development Plan and having regard to all relevant guidance and standards.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB504	Harley Newman	The submission seeks a rewording of policy KB-ED 5 to allow for permanent mobile homes. The submission refers to OPP site 6 and requests removal of the reference to permanent/static units.	Yes See separate folded map for Killybegs (Map 7)	<p>The subject land is located at the southern periphery of the town boundary (circa 1.6km from the town centre) and are zoned as Opportunity Site 6 in the Draft LAP. An Bord Pleanála has previously granted permission for retention and completion of a motorhome and touring caravan park at this location (Ref. PL05.237569) and for the use of lower lying lands within the site for locating motor homes, touring caravans and for camping (Ref. PL05.237992). It must be noted however, that this latter decision specifically prohibited the placement of 'permanent' mobile homes on the site, in the interests of preserving the visual amenities and character of the local landscape.</p> <p>Consistent with An Bord Pleanála's decision, Policy KB-ED-5 of the Draft LAP, which refers to the subject lands, states that "It is a policy of the Council to consider proposals for the use of Opportunity Site 6 as a facility for mobile homes/touring caravans/camping, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals for permanent/static mobile homes shall not be considered on this site". The land owner seeks to have the restrictions on the placement of permanent/static mobile homes removed.</p> <p>Whilst the contents of the submission have been noted, it is considered that removing the restriction on the placement of 'permanent' mobile homes at this location would (a.) be inconsistent with An Bord Pleanála's previous decision, particularly where no material change in circumstances has been demonstrated and (b.) would be inconsistent with emerging policy in the Draft CDP 2018-2024 as it relates to mobile homes, specifically Policy TOU-P-17, which requires that such</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>developments be 'within safe walking distance of local services and facilities, i.e. via an existing or proposed footpath (The site in this case is peripheral to the town centre and is not served by any suitable pedestrian linkages).</p> <p>Recommendation: No changes are recommended to the substance of Policy KB-ED-5. However, it is noted that some confusion may arise in relation to the terminology employed in this policy and consequently it is recommended that minor edits be carried out whereby references to 'mobile home' are replaced with references to 'motor homes', as follows (new text in blue, deletions in strikethrough) -</p> <p>Opportunity Site 6 - Mobile Motor Homes/Touring Caravans/Camping This site is located on the periphery of the settlement and has previously been approved for use as a mobile motor home/touring caravan/camping facility. The Council is supportive of the continuation of this previously approved use. Policy KB-ED-5 refers.</p> <p>Policy KB-ED-5: It is a policy of the Council to consider proposals for the use of Opportunity Site 6 as a facility for mobile motor homes/touring caravans/camping, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals for permanent/static mobile homes shall not be considered on this site.</p> <p>This is a Non-Material Alteration – Ref. KBNMA2.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB725	Carr & Company Civil Engineers on behalf of Myles Cunningham	<p>1. Submission queries why lands previously zoned 'residential' are now proposed to be zoned 'local environment' (lands identified on accompanying map).</p> <p>2. Submission requests that the subject lands be zoned 'Primarily Residential', on the basis that the lands are located within an established residential area, with access to Roshine Road and existing services. It is contended that the development of these lands for housing would be consistent with the strategic objectives for housing set out in the Draft LAP and CDP 2012-2018.</p>	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>1-2. The subject lands are located north of the industrial road and west of Roshin Road. The lands are in relatively close proximity to the town centre. However, there is no suitable means of vehicular access to the site (i.e. access is via a very narrow road that would not be capable of catering for any significant level of development) and gradients on the north-western portion of the lands are quite steep and thus not readily conducive to development. Owing primarily to the lack of a suitable access no changes are recommended to the zoning on this site.</p> <p>Recommendation: No change.</p>
KB726	Carr & Company Civil Engineers	<p>1. Submission requests the rezoning of a parcel of land proposed to be zoned as 'Community' - i.e. Requests that the subject lands be zoned as 'Economic Development', with an 'Amenity/Community' buffer zoning between the economic development zoning and existing housing (proposals are identified on plans accompanying the submission).</p> <p>2. It is contended that the subject lands are the only area available to Killybegs Seafoods for useful, functional expansion.</p> <p>3. Apart from protecting the public walkway and retaining amenity to the existing housing, it is contended that there is little merit restricting development of this area.</p>	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>1-3. The lands subject of this submission are located northeast of the existing Killybegs Seafoods premises and are zoned 'Community' in the Draft LAP. Permission was previously granted on the southern half of the lands for a playground (ref. 06/20907), but this permission was never implemented. A more recent application on the northern half of the subject lands (ref. 15/50742) which provided, inter alia, for an extension to the concrete yard serving the Seafoods premises, was the subject of a two-part order wherein the commercial yard extension was refused due to concerns that (a.) the proposed yard extension would be detrimental to the residential amenities of nearby properties and (b.) extension to the commercial use at this location may lead to traffic congestion within the town. These concerns remain valid and consequently, no changes to the draft 'Community' zoning are recommended.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB727	Killybegs Regeneration Group	<p>1. Killybegs is a strategic town. Development of the towns physical infrastructure, shops, cafes and amenities all need to be supported.</p> <p>2. Traffic flows need to be aligned to facilitate visitors in stopping and shopping in Killybegs. 3. The views on approach to Killybegs need to be kept clear of trees and shrubs to allow views over the harbour. Visual improvements are needed on a number of premises along this road; landscaping and a footpath should be continued to the Lough Head Bridge.</p> <p>4. The Diamond area is in need of a more welcoming civic space.</p> <p>5. Parking in the town needs to be addressed.</p> <p>6. Dereliction is an issue in the town centre.</p> <p>7. It is suggested that the street in the town is partially pedestrianised to create more of a civic space.</p> <p>8. Footpaths are in a bad state of repair and should be replaced with a cobble scheme.</p> <p>9. Street signs and premises signs could be themed to enhance the attractiveness of the facade.</p> <p>10. It is suggested that Bridge St. could be made one-way or pedestrianised. Overhead cabling could be run underground. Footpaths</p>	No	<p>1-19. The contents of this submission have been noted and considered. The Draft LAP will be supportive of all appropriate proposals that enhance the amenities of Killybegs. The Draft LAP already incorporates policies to promote appropriate signage, urban regeneration and the provision of amenities such as cycleways and greenways. The LAP also incorporates policies to protect views over the harbour when approaching on Regional Road R263.</p> <p>In terms of car parking within the town, the Council will continue to explore all reasonable approaches to supplement car parking provision within Killybegs and it should be noted that the 'Established Development' zoning that applies to the Council yard in the Draft Plan would not preclude the consideration of appropriate proposals for the provision of car parking. The old coal yard on the Shore Road is zoned as Opportunity Site 3 in the Draft LAP and is a strategic site where the creation of a strong street frontage would be important. For this reason, the designation of the site solely for car parking is not considered appropriate. Any development proposals on this site however, would be required to comply with the Councils parking standards. With regard to the greenfield site on Conlin Road, the 'Established Development' zoning in the Draft LAP would not preclude consideration of a proposal for a car park at this location and as such a revised zoning is not considered necessary, although it should be noted that the site has an issue with Japanese Knotweed and gradients are not ideal for development.</p> <p>With regard to comments concerning a civic space in the town, Section 10.4.6 'Town Centre Actions' clearly sets out ambitions to develop a pedestrian friendly centre/civic space within the</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>should be widened to allow safe passage for school children and to inhibit parking on the street.</p> <p>11. The old Council yard should be utilised as a car park.</p> <p>12. Vibrant colours should be used on buildings along the streetscape in the town centre and along the old Fintra Road.</p> <p>13. Connectivity from the Shore Road to Main St. is an issue and a footbridge along the river up to the Main St. should be considered.</p> <p>14. Further parking areas needed in town. Suggestions are - Old coal yard site in town centre, Council yard at Bridge, site at Conlin Road linking a walkway into the old slaughterhouse lane on Bridge St. and site on Church Road behind St. Catherine's Vocational School.</p> <p>15. Submission suggests that the auction hall, harbour store and old coastguard buildings should be opened for retail, tourism and public amenities.</p> <p>16. A maritime museum and aquarium is a must for the town.</p> <p>17. Cycleways, walkways and greenways are important. The river walk from Bridge Street to Drumbarity and the connectivity from the Emerald Drive estate to the school as looped</p>		<p>town centre.</p> <p>In terms of housing, the development management process will continue to ensure that an appropriate mix of residential dwelling units is provided throughout the town in order to cater for varying tenures. This approach is explicitly supported by Policy UB-P-11 of the Draft County Development Plan 2018-2024.</p> <p>With regard to the heritage of the town, the policies of the LAP and CDP will operate to ensure that all heritage features within the settlement are conserved and protected.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>river walks will promote the area.</p> <p>18. There is a need for housing for families, students visitors and for retirement housing.</p> <p>19. There is a need to protect the heritage of the town.</p>		
KB800	Killybegs Tidy Towns Committee	Submission requests that a significant boundary be kept around the lake at Greenhills on the Industrial Road in order to protect said lake and wildlife. This is the only lake in close proximity to Killybegs.	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	Refer to recommendation above for Material Alteration Ref. KBMA9 (submission Ref. KB1)
KB801	Carr Architects	<p>1. Submission relates to lands around Hollybush Bar, Killybegs.</p> <p>2. it is noted that some of the subject lands are included in a local environment zoning. Landowner is requesting that a portion of the lands be zoned for economic development. Town boundary would have to be extended to facilitate this.</p> <p>3. Submission contends that an opportunity exists for a bespoke tourism product incorporating the Hollybush Bar and a number of riverside lodges and that an Economic Development zoning would facilitate this.</p> <p>4. Submission notes that all required services are in place.</p> <p>NB - addendum sent 24/01/18. Photographs</p>	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>1-4. The lands subject of this submission are located adjacent to Regional Road R263, approximately 1.8km from the town centre, in an area that is distinctly rural in character. The former Hollybush Bar lies within the lands in question.</p> <p>The proposed town boundary for Killybegs, as presented in the Draft LAP, is extensive; the reason for this being that the boundary has been defined to effectively mirror the route of the proposed Killybegs outer relief road. A further extension to the town boundary on foot of this submission may effectively result in a 'multiple' holiday home development in a location that is very peripheral to Killybegs, with no pedestrian footpaths and where occupants would not have easy access to local shops and amenities. Whilst the existence of the former Hollybush Bar on the site is acknowledged, it is generally considered that the redevelopment of this building would not in itself constitute a 'resource related' tourist development that would merit the provision of additional holiday accommodation at this rural location. As such, the proposal subject of this submission would</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		are attached in order to demonstrate the scenic amenity of the Bungosteen River which runs along the eastern boundary of the McHugh's site. Addendum submission cites potential for fishing activities and the extension of walking trails identified in the Draft LAP to link into a riverside walk.		<p>not accord with emerging policy in the Draft CDP 2018-2024 as it relates to holiday home development. Consideration must also be given to the fact that a 'multiple' development on this site might compromise the delivery of the outer relief road and may be premature pending further detailed design of said route.</p> <p>Notwithstanding the foregoing, it should be noted that alternative opportunities may exist for this landowner under the tourism policies in the Draft County Development Plan, without the need to extend the town boundary of Killybegs.</p> <p>Recommendation: No change.</p>
KB813	Oideas Gael	<p>1. The submission notes that the Sliabh Liag Peninsula offers an extensive range of heritage sites, with Killybegs being an integral part of this heritage</p> <p>2. The submission states, inter alia, that it is satisfying to see that Donegal County Council is recognising the enormous potential of the county's extensive cultural riches.</p>	No	<p>1-2. The contents of this submission are noted.</p> <p>Recommendation: No change.</p>
KB818	Evelyn Kierans	Submission is from an existing business owner in Killybegs. Submission requests that certain lands be included within the 'economic development envelope' in order to allow for future expansion of business (relevant lands are identified on map accompanying the submission).	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>This submission cites the likelihood that Swan Net will be seeking to expand their business operations at their Roshin Road premises at some point in the future and requests (a.) that the town boundary be extended to include the lands in question (approx. 0.55 Ha) and (b.) that the lands be zoned as 'Economic Development'.</p> <p>The proposed boundary extension and zoning proposal would represent a relatively minor alteration to the town boundary and would allow for the sustainable expansion of an existing</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
				<p>business.</p> <p>Recommendation: Amend the Killybegs town boundary to incorporate the lands indicated on the map entitled 'Proposed Material Alteration KBMA11' contained at the end of this section of the report and include said lands within the 'Economic Development' zoning.</p> <p>This is a Material Alteration – Ref. KBMA 11.</p>
KB819	Killybegs Regeneration Group	<p>1. Submission requests the inclusion of 2 potential sites for car parking in Killybegs - a. The now redundant coal yard on the Shore Road, b. The field adjacent the Londis store on Conlin Road.</p> <p>2. Submission requests that mention be made of the potential to develop the car parks at LYIT for use as a camper van stopover during the summer months.</p>	<p>Yes</p> <p>See separate folded map for Killybegs (Map 7)</p>	<p>1. The contents of this submission are noted. The old coal yard on the Shore Road is zoned as Opportunity Site 3 in the Draft LAP and is a strategic site where the creation of a strong street frontage would be important. For this reason, the designation of the site solely for car parking is not considered appropriate. Any development proposals on this site however, would be required to comply with the Councils parking standards. With regard to the field opposite the Londis store on Conlin Road, the 'Established Development' zoning in the Draft LAP would not preclude consideration of a proposal for a car park at this location and as such a revised zoning is not considered necessary. The Area Roads Office has advised however, that gradients within this site are not especially conducive to development and that there is also an issue with the invasive species Japanese Knotweed.</p> <p>2. These comments are noted but this is essentially a matter for the LYIT. Any development of this nature would be a material change of use and thus would require a planning application.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
KB823	Seawinds B&B	<p>1. Submission requests that Shore Road be widened to allow for more car parking.</p> <p>2. Suggests that wall should be removed outside KFO car park and that this car park should then be joined up with Swan Net's car park.</p> <p>3. Protect right of way between St. Catherine's Vocational School and Church Road and complete to a high standard.</p> <p>4. Protect big tree at play ground.</p>	No	<p>1. Submission noted. The Draft LAP (Map No. 7) identifies an indicative area for additional car parking along the Shore Road.</p> <p>Recommendation: No change.</p> <p>2. Submission noted. This issue is considered to be outside the scope of the LAP and is a matter for the respective property owners.</p> <p>Recommendation: No change.</p> <p>3. The procedure for preservation of rights of way by means of provisions in a Development Plan is set out under the Planning and Development Act 2000 (as amended). The Draft County Development Plan 2018-2024 includes a list of public rights of way and a route between Church Road and St. Catherine's Vocational School is not included on this list. The existence or otherwise of a public right of way at this location is essentially outside the scope of the LAP.</p> <p>Recommendation: No change.</p> <p>4. Noted. Policy NH-P-10 of the Draft CDP 2018-2024 (which is also applicable within the LAP boundary) states that 'it is a policy of the Council to retain and protect significant stands of existing trees....'.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>5. Need to widen Church road up to graveyard and provide a pedestrian path.</p> <p>6. Requests that Sliabh Liag be kept natural.</p> <p>7. Suggests that greenway should be provided along Shore Road, up to industrial road and on to Mass Rock and water reservoir and over windmills to Bavin in Kilcar.</p>		<p>Recommendation: No change.</p> <p>5. These comments are noted. The policies of the LAP (and Draft CDP) would support appropriate road widening proposals and proposals for extensions to public paths.</p> <p>Recommendation: No change.</p> <p>6. Noted. This issue however, is outside the scope of the LAP.</p> <p>Recommendation: No change.</p> <p>7. Noted. Policy CCG-P-13 of the Draft CDP (which would be applicable within Killybegs) would support the creation of appropriately designed greenway infrastructure.</p> <p>Recommendation: No change.</p>
KB824	Seawinds B&B	Submission contains a SWOT analysis and documentation concerning an idea for a 'Museum of Coastal Life'.	No	<p>The contents of submission are noted. The objectives and policies in the LAP would position Killybegs favourably should such a proposal be forthcoming.</p> <p>Recommendation: No change.</p>
KB826	John O'Neill	Submission suggests that EU funding is possibly available for walk/cycleway between Killybegs and Fintra Strand (and even if no funding is available the submission notes that this is a most dangerous road).	No	Refer to response to KB146 above.
KB828		The submission requests that an area of amenity open space be rezoned as Established Development. The submission states that the land in question (which is	Yes See separate folded map for	The contents of this submission have been noted and considered. It would indeed appear that the existing grotto and area of landscaped open space is located on lands to the immediate north of the O' Riordans lands and as such it is

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		identified on a map accompanying the submission) comprises part of the garden of an existing house.	Killybegs (Map 7)	reasonable that their garden area be rezoned as 'Established Development'. Recommendation: Rezone the lands indicated on the map entitled 'Proposed Material Alteration KBMA12' contained at the end of this section of the report from 'Amenity/Open Space' to 'Established Development'. This is a Material Alteration – Ref. KBMA 12.
KB829	Geraldine Shovlin Kee	Submission requests that land previously zoned High Density Residential in the 2008-2014 Killybegs LAP be zoned to allow for one-off housing. It is contended that the land will never be used for high density development.	Yes See separate folded map for Killybegs (Map 7)	The contents of this submission have been noted and considered. The subject lands are zoned as a mix of 'Established Development' and 'Primarily Residential' in the Draft LAP, as opposed to 'High Density Residential'. Any proposals for 'one-off' residential development on these lands will be assessed on their own merits in the context of all relevant policies and standards. Recommendation: No change.
KB834	Paul Doherty Architects on behalf of Mr. Martin Connell	Submission requests that the proposed 'Primarily Residential' zoning on site PR7 be maintained. The landowner contends that if the zoning is maintained he will seek planning permission for housing development on these lands.	Yes See separate folded map for Killybegs (Map 7)	The contents of this submission are noted. No changes are proposed to site PR7. Recommendation: No change.
KB837	Seawinds B&B	1. Submission states that the Draft LAP shows a good plan for Killybegs for the future. 2. Submission contends that road appearance from the 5 points to the town centre is poor. Notes that it will be important to protect the views on approach to the town on the sea side of the road and keep trees	No	1-22. The contents of this submission have been noted and considered. The LAP will be fully supportive of developments that serve to enhance the visual and cultural amenities of Killybegs, that attract visitors to the town centre and that protect and improve the built, natural and archaeological heritage. Certain matters raised in the submission are considered to be outside the scope of the LAP (e.g. development levies, monitoring of water pollution, protection of Blue Flag

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>low in this location.</p> <p>3. Submission contends that signage coming into the town is very poor and refers to a proposal called 'Re-branding Killybegs'. Quality signage is needed to reflect existence of fishing port, history, tourism college.</p> <p>4. Funding required to improve LYIT campus in Killybegs.</p> <p>5. Fintra Bridge should be a priority for improvement.</p> <p>6. it is suggested that there should be no development charges for investors until the town sees a turn in fortune and employment rates increase.</p> <p>7. Tourism aspect of Killybegs needs to be developed.</p> <p>8. Submission notes that we need to entice visitors to get out of their cars and walk through the town.</p> <p>9. Signage at junctions between Shore Road and Main St. needs to be improved in order to direct traffic towards Main St.</p> <p>10. It is suggested that a large scale visitor centre is required.</p> <p>11. Submission suggests a number of sites to potentially zone 'Recreation' - a. The red auction shed on the pier, b. Council yard and buildings on Bridge St., c. possible site beside</p>		<p>beaches, funding for LYIT campus, improvement of Fintra Bridge). With regard to the sites suggested for solely recreational use, these sites are generally considered to be important town centre sites that could potentially be used for mixed purposes (e.g. commercial, tourism related etc.). Such mixed uses could perhaps incorporate amenity areas within the overall design, thus adding to the environmental quality of the town. However, it is considered that a zoning solely for recreation would be unduly restrictive at these locations and may hamper development potential in the town – as such, no zoning changes are recommended on these sites.</p> <p>With regard to the provision of cycle lanes and greenways, the LAP will be supportive of appropriately designed schemes.</p> <p>Flooding issues affecting new developments within the town will be addressed via the suite of policies and objectives set out in the Draft CDP 2018-2024 (which are also applicable within the LAP boundary). Specific suggestions regarding the construction of new culverts and flood defence walls are not within the scope of the LAP.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>the new fire station on the pier.</p> <p>12. New street furniture, hanging baskets and murals etc. would encourage cars to stop in the town.</p> <p>13. Link required between the Shore Road and Main St. A river walk should be provided on the ESB/Cope House side of the river, with permission of owners.</p> <p>14. Cycle lanes should be provided along the Shore Road onto the Industrial Road.</p> <p>15. Water pollution needs to be managed within harbour.</p> <p>16. Drinking water needs to be monitored and no chemicals added.</p> <p>17. Blue flag beach (unspecified) needs to be protected from pollution.</p> <p>15. Greenways should be developed.</p> <p>16. Submission notes that the harbour is a great asset but is under-utilised. Water sports, outdoor pursuits, marina etc. all need to be developed and supported.</p> <p>17. Hospital needs to be protected, as does Mass Rock and monuments in the town.</p> <p>18. Submission notes that it is vital to protect St. Catherine's Well area.</p> <p>19. Fishermans Wharf (OPP Site 1) should be</p>		

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>linked to Main St.</p> <p>20. Flooding - Donegal Co. Co. should build a wall bordering the river near the Shore Road and around by the Cope car park and Molloy's garden. Pipes for storm water are too small - large culvert pipe under the Shore Road is needed. Flooding occurred recently because of poor pipe outlets to the sea.</p> <p>21. Submission proposes that no development levies should be applied for shortfall in car parking provision if retail ground floor is less than 500 square feet, in order to promote re-use of vacant shops in the town centre.</p> <p>22. SWOT analysis submitted in relation to Killybegs.</p>		

Table 9.4: Unspecified Issues raised during public consultation process (Refer to Appendix F for names of parties that lodged submissions)

Submissions dealing with unspecified issues	
Summary of points raised in submissions	Response and Recommendations Arising
The submissions state that they support the protection of an unspecified area. No maps or further details in relation to the area in question have been provided.	The submissions are noted. However, in the absence of any additional detail it is not possible to comment any further.

10 GENERAL PUBLIC SUBMISSIONS

10.1 Overview

Nine submissions have been lodged that do not relate to a specific town as such, but rather deal with a wide range of more generalised and varied issues, ranging from, inter alia:

- Expressions of support for the draft document;
- Concerns in relation to the cost of producing the plan;
- Suggestions for the provision of community facilities throughout the county;
- Comments in relation to the need for preservation of the Irish language;
- Comments in relation to gaming/casinos;
- General comments in relation to built heritage;
- Comments in relation to the use of Council lands;
- Comments regarding pop-up shops and markets and
- Comments in relation to the need for strict guidelines for asbestos and fire safety.

A summary of all submissions, together with the response and recommendations arising, can be found in Table 10.1.

Table 10.1: General Public Submissions

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
GEN1	Thomas McMenamin	Submission claims that Donegal County Council is wasting money on the Draft Seven Strategic Towns LAP 2018-2024 and has already wasted billions on other matters.	No	<p>The contents of this submission are noted. The preparation of the Seven Strategic Towns Local Area Plan 2018-2024 is necessary to provide for the proper planning and sustainable development of each settlement and will ensure amongst other things that important features of natural, built and cultural heritage are protected whilst at the same time providing a degree of certainty for prospective developers and making sure that adequate lands are reserved to cater for the future housing, economic and social needs of the towns. The plan has been prepared in-house, in full accordance with legislative provisions and it is not considered reasonable to suggest that this strategic planning document is a waste of money or resources.</p> <p>Recommendation: No change.</p>
GEN2	Thomas McMenamin	Submission raises concerns in relation to major underspend by Donegal County Council in relation to rural scheme budget. Claims this is proof of Donegal County Council wasting money.	No	<p>This submission relates to spending by Donegal County Council on schemes such as the Clár programme, the Rural Recreation Scheme and the Town and Village Renewal Scheme. Budgetary matters in relation to these programmes are outside the scope of the LAP.</p> <p>Recommendation: No change.</p>
GEN3	Paul Anderson	Submission queries whether there a cost associated with making a submission on the Draft LAP and asks why does the submission have to be hard copy only?	No	<p>There is no cost associated with making a submission on the Draft LAP and submissions can be accepted by hard copy or via email. The Planning Department contacted the writer of the submission in this case and clarified the position.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
GEN4	Eamon Flanagan	Submission notes that the writer is happy to support the Draft LAP.	No	Noted. Recommendation: No change.
GEN5	Deirdre Taylor	Submission states that it is great to see area preserved and designated open space (no area identified in submission).	No	Noted. Recommendation: No change.
GEN6	Anne Voogel McGuinness	Supports the Draft LAP 'for amenity'.	No	Noted. Recommendation: No change.
GEN7	Rachel Carr	<ol style="list-style-type: none"> The submission suggests a number of community and amenity facilities which should be incorporated in the Draft LAP: <ul style="list-style-type: none"> • make all areas wheelchair accessible • install speed ramps at all town/village entrance • build outdoor gyms to promote a healthy lifestyle for communities • provide basketball/skateboard parks for teenagers • provide safe parking at schools The submission suggests the following tourism initiatives be incorporated in the Draft LAP: <ul style="list-style-type: none"> • promote walking/cycling/jogging by having enough room on roads to facilitate these activities • work with Fáilte Ireland and make more lay-bys on the WAW 	No	<p>1-2. These comments are noted. The LAP would be supportive of all appropriate community initiatives that would serve to improve the quality of life for residents within each of the seven settlements.</p> <p>Recommendation: No change</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<ul style="list-style-type: none"> • promote coastal activities <p>3. The submission suggests the following initiatives be incorporated in the Draft Plan to meet the housing needs in the seven towns:</p> <ul style="list-style-type: none"> • be the first Council to eliminate homelessness by applying CPOs on abandoned houses • move quicker to open up boarded up Council houses • build more social/affordable passive homes in the seven towns 		<p>3. Comments in relation to homelessness and the need for social and affordable housing are noted. Matters in relation to the compulsory purchase of abandoned houses are noted but are outside the scope of the LAP. Similarly, comments in relation to the use of existing Council properties and in relation to the housing construction programme are outside the scope of the LAP and would in the first instance have to be addressed through the Council's housing department.</p> <p>Recommendation: No change</p>
GEN8	Cordelia Nic Fhearraigh	<p>1. Baineann an aighneacht seo le caomhnú na Gaeilge:</p> <ul style="list-style-type: none"> • Caithfidh Comhairle Contae Dhún na nGall agus forais stáit eile gníomhú go láidir leis an Ghaeilge a chaomhnú agus a bhuanú nó go mbeidh an Ghaeilge básaithe laistigh de thréimhse 10 mbliana. • Níor chóir caomhnú agus buanú na Gaeilge a fhágáil faoi chúram grúpaí ná coistí pobail agus deonacha sa Ghaeltacht. Tá dualgas ar an Rialtas agus ar Chomhlachtaí Stáit eile agus ar Chomhairle Contae Dhún na nGall na ceantracha Gaeltachta a chaomhnú agus a chosaint. • Cé go bhfuil gá le neamhspleáchas agus féin-rialú sa Ghaeltacht, ní mhairfidh sí as a stuaim féin. Tá tacaíocht agus 	No	<p>1. Tá na tagairtí don ghá atá leis an Ghaeilge a chaomhnú tugtha faoi deara. Cé go bhfuil cuid de na ceisteanna a ardaíodh taobh amuigh de scóip an PCA (e.g. cainteoirí líofa Gaeilge a fhostú) tá Comhairle Contae Dhún na nGall mar Údarás Pleanála tiomanta chun an Ghaeilge a chaomhnú mar theanga bheo phobail sna ceantracha is láidre Gaeltachta agus chun úsáid na teanga a neartú in áiteanna eile (féach Cuspóir CCG-O-8, Dréachtphlean Forbartha Contae 2018-2024). Féachann an Dréachtphlean Forbartha Contae le tacaíocht a thabhairt do bhonn teanga na Gaeltachta trí thithíocht inbhunaithe tuaithe a éascú do chainteoirí dúchais Gaeilge agus trí Mheasúnaithe Tionchair Teanga a thabhairt isteach le haghaidh roinnt forbairtí ilchónaitheacha sa Ghaeltacht (féach Polasaí CCG-P18), Dréachtphlean Forbartha Contae 2018-2024).</p> <p>Moladh: Gan aon athrú.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>aitheantas de dhíth uirthi ó thaobh amuigh den Ghaeltacht.</p> <ul style="list-style-type: none"> • Caithfidh Comhairle Contae Dhún na nGall a bheith níos gníomhaí i dtaca le cur chun cinn na Gaeilge agus níos mó baill foirne, oibrithe, agus oifigigh shinsearacha a bhfuil Gaeilge líofa acu a earcú. <p>2. Cuirtear roinnt ceisteanna maidir le leaganacha Gaeilge den Dréachtphlean Ceantracha Áitiúla, An Tuarascáil Chomhshaoil agus an Measúnú Iomchuí NIR:</p> <ul style="list-style-type: none"> • Níl Dréacht-Doiciméid Ghaeilge ar fáil ar an suíomh idirlín. An mbeidh siad ar fáil nuair a fhoilseofar an Plean Ceantair Áitiúil críochnúil. <p>3. Tá sé doghlactha litriú Béarla / dátheangach a chur ar logainmneacha Gaeltachta ar gach léarscáil a thaispeánann bailte/bailte fearainn atá suite sa Ghaeltacht. Ba chóir Gaeilge amháin a úsáid le haitheantas ceart a thabhairt don</p>		<p>2. Beidh leaganacha Gaeilge den PCÁ agus den Tuarascáil Chomhshaoil ar fáil ar shuíomh idirlín na Comhairle. Maidir leis an Mheasúnú Iomchuí i dtaca le Tuarascáil Tionchair Natura – is anailís eolaíochta í an Measúnú Iomchuí ar an tionchar a d'fhéadfadh a tharlú de bharr cur i bhfeidhm an PCÁ (agus aon Athruithe Ábhartha) ar gach ceann de spéiseanna incháilithe na Suíomhanna Eorpacha (SPA-anna agus SAC-anna) agus ar shláine ghréasán Natura 2000 laistigh den Chontae agus laistigh de 15KM den Chontae. Is doiciméad oibre, cúlra, eolaíoch é seo chun bonn eolais a chur faoin Mheasúnú Iomchuí. Níl sé riachtanach an chuid seo den phróiseas a fhoilsiú go dátheangach; tá gá, áfach, leis an Ráiteas Measúnaithe Iomchuí a sholáthar sa dá theanga agus cuirfear an ráiteas seo ar shuíomh idirlín na Comhairle.</p> <p>Moladh: Gan aon athrú.</p> <p>3. Maidir le teidil na léarscáileanna agus ainmneacha na mbailte fearainn orthu siúd etc agus úsáid téacs dátheangach i gcoitinne; creidtear gur oiriúnaí téacs/ainmneacha dátheangacha a úsáid mar ghnáthchleachtas mar go gciallaíonn sé go mbíonn an plean níos sothuigthe agus níos soiléire, agus go bhfreastalaíonn sin ar lucht léite níos forleithne an oiread agus is féidir, gan aon dochar a</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Ghaeltacht.</p> <ul style="list-style-type: none"> • Maidir le Measúnú Iomchuí (MI) – Caibidil 4 – Réamhrá: Tá gach oileán amach ó chósta sa Chontae suite laistigh den Ghaeltacht agus ba chóir, dá bhrí sin, go mbeadh gach logainm agus gach ainm oileáin a bheith i nGaeilge amháin e.g. Ceann Fhánada, Gleann Cholm Cille, Toraigh, Inis Bó Finne, Inis Meáin, Arainn Mhór etc. • Maidir le MI – Caibidil 4 – Léarscáil 4.1 Léarscáil Lonnaithe Bailte: ba chóir ainmneacha na mbailte ar an léarscáil seo a bheith i nGaeilge amháin. Bain amach téacs dátheangach e.g. An Clochán Liath (Dungloe). • Maidir le MI – Caibidil 4 – Roinn 4.2 An Clochán Liath (Dungloe): Bain amach an téacs dátheangach do An Clochán Liath (Dungloe). Tá ceantar/paróiste iomlán na Rosann suite taobh istigh den Ghaeltacht agus ba chóir an téacs seo a leanas a cheartú mar seo a leanas: "Is é an príomhbhaile sna Rosa (atá suite sa Ghaeltacht)....." (it is the main town of the Rosses (which is located within the Gaeltacht)). • Maidir le MI – Caibidil 4 – (Tábla 5.1: téacs dátheangach do An Clochán Liath (Dungloe) mar go bhfuil sé suite sa Ghaeltacht. • Maidir le MI – Caibidil 4 – Léarscáileanna agus gach Léarscáil sna doiciméid: ba 		<p>dhéanamh d'úsáid na Gaeilge. Maidir leis an 'bhonnléarscáiliú' sna léarscáileanna sa PCÁ, caithfear a chur in iúl gur formáid chaighdeánaithe atá i gceist anseo a chuireann Suirbhéireacht Ordanáis na hÉireann ar fáil, agus dá bhrí sin nárbh fhéidir ainm gach baile fearainn etc a athrú ar an léarscáileanna seo.</p> <p>Moladh: Gan aon athrú.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>chóir leaganacha Gaeilge amháin de na na logainmneacha a úsáid ar an Léarscáil seo le haitheantas ceart a thabhairt don Gaeltacht.</p> <p>1. The submission relates to the preservation of the Irish Language.</p> <ul style="list-style-type: none"> • Donegal Co. Co. and other state bodies need to take strong action to conserve and preserve the Irish language or else the language will have disappeared in 10 years time. • The conservation and preservation of the Irish language should not be left to community and voluntary groups and committees in the Gaeltacht. The Government and other State Bodies and Donegal Co. Council have a duty to preserve and protect Gaeltacht areas. • Although independence and self-governance is essential for the Gaeltacht, it will not survive on its own. It needs support and recognition from the community outside the Gaeltacht. • Co. Co. needs to be more proactive in relation to the promotion of the Irish language and to recruit workers/staff/senior officers who are fluent in Irish. 		<p>1. Comments in relation to the need to preserve the Irish language are noted. Whilst some of the issues raised in the submission are outside the scope of the LAP (e.g. hiring of fluent Irish speakers) Donegal County Council as a Planning Authority is committed to sustaining the Irish language as a living community language in the strongest Gaeltacht areas and to strengthening the use of the language elsewhere (see Objective CCG-O-8, Draft County Development Plan 2018-2024). The Draft County Development Plan also seeks to support the linguistic base of the Gaeltacht through the facilitation of sustainable rural housing for native Irish speakers and the application of Language Impact Assessments for certain multiple residential developments in Gaeltacht area (see Policy CCG-P18, Draft County Development Plan 2018-2024).</p> <p>Recommendation: No change</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>2. The submission asks a number of questions in relation to the Irish Language versions of the Draft LAP, Environmental Report and Appropriate Assessment NIR:</p> <ul style="list-style-type: none"> • The Draft Irish documents are not accessible on the website. Will they be available when the final LAP is published? <p>3. English spellings/bilingual spellings of Gaeltacht placenames on all the maps that show/illustrate towns/towlands located in the Gaeltacht are not acceptable. Only Irish should be used to give proper recognition to the Gaeltacht.</p> <ul style="list-style-type: none"> • Re: AA - Chapter 4 - Introduction: All the off-coast islands in the County are within the Gaeltacht and as such all placenames and Island names should be in Irish only eg. Fanad Head, Glencolmcille, Tory Island, Inishbofin, inishmeane, Aranmore etc. • Re: AA - Chapter 4 - Map 4.1 Town 		<p>2. Irish versions of the LAP and Environmental Report will be made available on the Council website. With regard to the Appropriate Assessment Natura Impact Report - the Appropriate Assessment is a scientific analysis of the potential impact of the implementation of the LAP (and any Material Alterations) on each of the qualifying interests of European Sites (SPAs and SACs) and the integrity of the Natura 2000 network within the County and within 15km of the County. This is a background, working, scientific document that informs the AA Statement. It is not a requirement to publish this element of the process bilingually; it is however necessary to produce the Appropriate Assessment Statement bilingually and this statement will be made available on the Council website.</p> <p>Recommendation: No change</p> <p>3. With regard to the titles of maps and the names of townlands etc. thereon and the use of bilingual text generally; it is considered that the use of bilingual naming/text is the most appropriate course of action as it makes the plan user-friendly to as wide an audience as reasonably practical, without compromising in terms of the use of the Irish language. With regard to the 'base mapping' on the maps within the LAP, it must be noted that this mapping is provided in a standardised format by Ordnance Survey Ireland and consequently it would not be possible to change the name of all townlands etc on this mapping.</p> <p>Recommendation: No change</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>Location Map: Irish language names of towns should only be used on this Map. Remove bilingual text eg. An Clochán Liath (Dungloe).</p> <ul style="list-style-type: none"> • Re: AA - Chapter 4 - Section 4.2 An Clochán Liath (Dungloe): Remove bilingual text for An Clochán Liath (Dungloe). The Rosses area/parish is entirely within the Gaeltacht area and the following text should be corrected as follows: "Is é an príomhbhaile sna Rosa (atá suite sa Ghaeltacht)....." (it is the main town of the Rosses (which is located within the Gaeltacht). • Re: AA - Chapter 4 - (Table 5.1: bilingual text for An Clochán Liath (Dungloe) as it is located in the Gaeltacht. • Re: AA - Chapter 4 - Maps in the documentation: Irish language placenames should only be used to give proper recognition of the Gaeltacht. 		
GEN9	Patricia McCafferty	<p>The submission relates to a number of issues as set out below:</p> <ol style="list-style-type: none"> 1. Tourism potential: The submission claims that the Tourism Officer in Bundoran is underutilized and could include other towns such as Ballyshannon and Donegal Town. 2. Gaming Loopholes: <ul style="list-style-type: none"> • The submission claims that there are gaming loopholes that allow Casinos to 	No	<ol style="list-style-type: none"> 1. These comments are noted but are outside the scope of the LAP. Recommendation: No change. 2. These comments are noted but are outside the scope of the LAP. Recommendation: No change.

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>operate anywhere in the County. It claims that Donegal Co. Co. is very inactive in enforcing gaming legislation. It is suggested that gaming legislation should form part of the planning strategy.</p> <ul style="list-style-type: none"> • Each of the seven towns should be allowed to apply for gaming licenses, not just Bundoran. There is tourism and business potential for towns like Donegal Town and Ballyshannon that currently have insufficient indoor amusement, bowling, co-karting and adventure facilities. <p>3. Historic Heritage protection:</p> <ul style="list-style-type: none"> • Ballyshannon and other towns have seen heritage buildings destroyed for no reason. All buildings of architectural value would be reassessed and further orders added to protect them. • If a developer leaves a heritage building like the Milstone Hotel lie vacant even though planning permission has been granted, they should be prosecuted by the Council. • Bundoran is a prime example of speculators buying sites and leaving them derelict, especially in town centres. 		<p>3. The Draft LAP and Draft County Development Plan (CDP) together contain a suite of policies and objectives that seek to protect and preserve the built heritage of our towns and villages. In terms of vacancy and dereliction within town centres, the Draft LAP and CDP contain policies to specifically address this issue (see Objective TV-O-7, Policy RS-P-8, Objective HS-O-1, Objective UB-O-9, Objective UB-O-11 and CCG-O-7 of the Draft CDP and Policy BY-TC-1, Policy CN-TC-2 and Policy KB-TC-4 of the Draft LAP).</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>4. Retail/Industrial development:</p> <ul style="list-style-type: none"> • The submission refers to the problem in Ballyshannon with Donegal Co. Co. allowing an Enterprise Centre to be built on private lands at Finner. • The submission contends that many years ago it was proposed that Bundoran IDA site be used for Donegal Co. Co. business hubs. The submission states that this idea was shot down, which resulted in IDA sites being built too far out of towns. • The submission suggests that IDA sites and Donegal Co. Co. lands should be made available for small businesses to set up and industry to blossom especially with the development of pop up shops and markets. <p>5. Objective GEN-TC-2: All public right of ways should be listed and mapped for each town for tourism potential, employment opportunities and for footfall opportunities.</p> <p>6. Objective GEN-ED-5: This objective should include the residents' right to light.</p>		<p>4. These comments are noted. The Draft Local Area Plan (LAP) and Draft County Development Plan (CDP) require that the sequential approach be applied to the location of new retail development. The Draft LAP identifies numerous sites within each of the seven settlements for general economic and industrial purposes and any development proposals for new commercial/retail/economic/industrial development will be assessed in light of all relevant policies of the LAP and CDP and all relevant guidelines and standards.</p> <p>Recommendation: No change.</p> <p>5. Comments in relation to rights-of-way are noted. The Draft County Development Plan 2018-2024 contains a list of Public Rights of Way (Table 18, Appendix 3) together with a map detailing the general location of these routes.</p> <p>Recommendation: No change.</p> <p>6. Comments in relation to 'rights to light' are noted. However, such matters would be more appropriately addressed via the Development Management process.</p> <p>Recommendation: No change.</p>

Ref.	Organisation /Group Or Name	Summary of points raised in submission	Submission Mapped Yes/No	Response and Recommendations Arising
		<p>7. Cycle routes should be developed in both urban and rural areas for greater safeguards to cyclists.</p> <p>8. Need strict guidelines for asbestos and fire concerns to avoid what happened in the Astoria Ballroom fire in Bundoran.</p>		<p>7. Noted. The LAP is fully supportive of the provision of appropriately designed and located cycle routes.</p> <p>Recommendation: No change.</p> <p>8. Comments in relation to fire safety standards and standards for asbestos are noted. However, such matters are outside the scope of the LAP and would be more appropriately addressed under the Building Regulations and associated legislation and guidance.</p> <p>Recommendation: No change.</p>

11 COLLATION OF MATERIAL ALTERATIONS

The following pages collate the proposed material alterations arising from the recommendations throughout this Report and in the following order of sequence:

- Table 11.1: Proposed General Material Alterations.
- Table 11.2: Proposed Material Alterations Relating to An Clochán Liath.
- Table 11.3: Proposed Material Alterations Relating to Ballybofey-Stranorlar.
- Table 11.4: Proposed Material Alterations Relating to Ballyshannon.
- Table 11.5: Proposed Material Alterations Relating to Bridgend.
- Table 11.6: Proposed Material Alterations Relating to Carndonagh.
- Table 11.7: Proposed Material Alterations Relating to Donegal Town.
- Table 11.8: Proposed Material Alterations Relating to Killybegs.

Table 11.1: Collation of the Proposed General Material Alterations

Material Alteration Ref. No	Material Alteration	Mapped Yes/No
General Proposed Material Alterations		
GENMA1	<p>1. Amend the Draft LAP as follows to make consequential amendments relating to housing supply as follows:</p> <p>(i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as set out in Appendix A of this report and;</p> <p>(ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as set out in Appendix A of this report.</p>	No
GENMA2	To amend the LAP so as to incorporate the outputs of the Stage 2 Strategic Flood Risk Assessment as set out in the text contained in Appendix B of this Report.	No
GENMA3	<p>Insert new policy in Section 3.4.3 of the Draft LAP as follows (new text shown in blue):</p> <p>GEN-ED-6: It is a policy of the Council to consider proposals for home-based businesses of a limited scale, of circa 1-5 employees, within an existing dwelling, or the curtilage of a dwelling and having regard to all other material planning considerations.</p>	No

Table 11.2: Collation of the Proposed Material Alterations Relating to An Clochán Liath

(NB: Where relevant, mapping for proposed material alterations for An Clochán Liath are contained at the end of Table 3.1 in section 3 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
An Clochán Liath (Dungloe)			
CLMA1	<p>(a) Amend Policy CL-TC-3 as follows; (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>Policy CL-TC-3: It is a policy of the Council to consider proposals for retail/commercial development on Opportunity Site 3 where it can be demonstrated that the massing, footprint and height of the proposal, and the nature of the proposed uses(s), are compatible with the adjoining properties. Proposals shall provide for widening of the adjacent road and improvements to the Main Street junction. Proposals shall be required to demonstrate that they shall not give rise to any flood risk by means of a site specific Flood Risk Assessment. In this regard, proposals for residential development are unlikely to be will not be acceptable. The finished floor levels of buildings shall be raised above predicted flood levels in accordance with Section 2.23 of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities, (DoEHLG, 2009)'. The finished floor levels of buildings shall be raised above predicted flood levels in accordance with Section 2.23 of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities, (DoEHLG, 2009)'. The site was subject to, and passed, a development plan 'justification test' for 'less vulnerable' land uses such as commercial activity. It is considered that the site provides some retail or cafe style riverside potential but must provide pedestrian accessibility along this riverside linking the amenity waterfront areas to the west. Any development proposals should provide</p> <p>(b) Amend text in Opportunity Site 3: North of the River paragraph on p. 26 (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>Opportunity Site 3: North of the River</p> <p>Moderate size site of 0.62ha directly north of Dungloe river outside but adjoining the retail core area. The site is bound along the northern side by a narrow road which provides access from the Town centre to Dungloe Pier. A large part of the southern portion of the site falls within Flood Zone C Flood Zone A as identified in Stage 2 Strategic Flood Risk Assessment Report CFRAMS map. As such the Justification Test was applied as part of this Report will apply for any development as per the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The site was subject to, and passed, a development plan 'justification test' for 'less vulnerable' land uses such as commercial activity. It is considered that the site provides some retail or cafe style riverside potential but must provide pedestrian accessibility along this riverside linking the amenity waterfront areas to the west. Any development proposals should provide</p>	Section 3.2.1 of CE Report in relation to SFRA	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
An Clochán Liath (Dungloe)			
	pedestrian accessibility to the 'Riverwalk' walkway located to the north east of this site, along the river to the waterfront amenity areas to the west. Any proposal shall include proposals to widen the access road towards the north east of the subject site. There is also potential for linking these 2 amenity areas which could be used by the inhabitants of An Clochán Liath and could attract visitors into the town. Policy CL-TC-3 refers. <i>"Any proposals for development must be accompanied by a site specific flood risk assessment, prepared in accordance with the guidelines set out in 'The Planning System and Flood risk Management Guidelines for Planning Authorities, (2009)"</i>		
CLMA2	To amend boundary of the town and zoning of lands identified on the map entitled 'Proposed Material Alterations CLMA1' contained at the end of this section of the report. to accurately identify the route of the River walk on the northern side of the river	CL1	Yes
CLMA3	To amend Policy CL-TMR-2 and associated text as follows; (new text shown in blue, text to be deleted shown in strikethrough) (i) Policy CL-TMR-2: It is a policy of the Council to support the principle of a marina-type development <i>Leisure/Amenity/Tourism type development</i> in An Clochán Liath (Dungloe) subject to compliance with Habitats Directive, environmental considerations and all other relevant objectives and policies of this LAP. (ii) Amend the following text on the 2 nd paragraph on p. 35 as follows; Marina Site Consistent with the tourism and leisure role and function of An Clochán Liath (Dungloe), the town's position on the route of the Wild Atlantic Way, and the growing water-based tourism and leisure sector, DCC supports the principle of a marina-type development <i>Leisure/Amenity/Tourism type development</i> in the vicinity of the shorefront area of the town. A possible site for such a development in the vicinity of the town pier is identified on the Land Use Zoning Map (Map 2 refers). Such a development would complement the leisure uses already	CL2	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
An Clochán Liath (Dungloe)			
	development and remaining to be developed in the shorefront area of the town.		
CLMA4	<p>To amend Policy CL-TMR-3 and associated text as follows; (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>Policy CL-TMR-3:</p> <p>It is a policy of the Planning Authority to consider proposals for predominantly community and leisure-related uses, including those that are associated or compatible with the adjacent Hospital and GAA uses within the site identified as 'Masterplan Site' on the Land Use Zoning Map. Proposed developments shall only be considered in the context of a submitted Masterplan for the entire area and the Masterplan may identify alternative, compatible uses where such uses would be clearly ancillary to the aforementioned primary uses. Proposed extensions to established uses adjacent to the Masterplan area may also be considered where it can be clearly demonstrated that such development would not prejudice the achievement of the overall Masterplan concept and predominant uses therein, subject to compliance with the other objectives and policies of this Plan. Proposals for development shall:</p> <ol style="list-style-type: none"> a) Have regard to the CFRAMS An Clochán Liath (Dungloe) Fluvial Flood Extents mapping flood zone proposals shall be accompanied by a site specific flood risk assessment, prepared in accordance with the guidance set out in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009); b) Identify a suitable pedestrian access onto the N56/Carnmore Road side of the site; and c) Identify a suitable river crossing to the 'Riverwalk' amenity route. 	CL6	No
CLMA5	To amend the boundary of the town and zone these lands as 'Established Development' as identified on the map entitled 'Proposed Material Alterations CLMA5' contained at the end of this section of the report.	CL14	yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
An Clochán Liath (Dungloe)			
CLMA6	To amend the zoning of lands from 'Established Development' to 'Town Centre' as identified on the map entitled 'Proposed Material Alterations CLMA6' contained at the end of this section of the report.	CL14	yes
CLMA7	<p>To amend the zoning of lands from 'Economic Development' to 'Local Environment' as identified on the map entitled 'Proposed material Alterations CLMA7', contained at the end of this section of the report.</p> <p>(b) To remove Policy CL-ED-1 as follows; (new text shown in blue, text to be deleted shown in strikethrough)</p> <p>Policy CL-ED-1: It is a policy of the Council to consider proposals for the development of Class 3 (Offices), Class 4 (Light Industrial), research and innovation, and digital technologies on Economic Development Site 1 (ED1) (located to the south of the Radox etc complex, refer to Map 2), subject to compliance with the undernoted criteria, and all other relevant policies of the LAP. Proposals shall only be considered in the context of a Masterplan for the overall site. In Draft Seven Strategic Towns Local Area Plan 2018-2024 Chapter 4: An Clochán Liath (Dungloe) Page 29 exceptional circumstances, proposals for minor development may be considered in the absence of an agreed Masterplan</p> <p>(ii) To delete 2nd paragraph in section 4.5.1 as follows;</p> <p>The Radox complex is located in a wider industrial area that extends across an area of some 6.85 hectares. It is the opinion of the Council that the presence, stature and success of such a company is something that could be developed further to the overall benefit of the town. For this reason, and in the context of the preferred industrial/hgv traffic route around the north of the town (refer Section 4.7.1), a significant area of additional lands for economic development is identified adjacent to the area of town in which the Radox plant and other industrial uses are already situated. The identified area is also served by a potentially suitable road and junction onto the Regional Road although some surfacing, footpath and public lighting would be required. The established economic development area and the proposed economic development area would provide for a total of 13.95 hectares of such land. Any future application for significant development on these additional lands shall include an overall 'Masterplan' for the overall site.</p>	CL24	Yes

Table 11.3: Collation of the Proposed Material Alterations Relating to Ballybofey-Stranorlar

(NB: Where relevant, mapping for proposed material alterations for Ballybofey-Stranorlar are contained at the end of Table 4.1 in section 4 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
BSMA1	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA1' contained at the end of Table 4.1 in section 4 of this report from 'OPP Site 6' to 'Recreation and Amenity'.	Section 4.2.1 Stage 2 Strategic Flood Risk Assessment	Yes
BSMA2	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA2 contained at the end of Table 4.1 in section 4 of this report from 'Community' to 'Recreation and Amenity'.	Section 4.2.1 Stage 2 Strategic Flood Risk Assessment	Yes
BSMA3	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA3' contained at the end of Table 4.1 in section 4 of this report from 'Residential' to 'Recreation and Amenity'.	Section 4.2.1 Stage 2 Strategic Flood Risk Assessment	Yes
BSMA4	<p>2. Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA4 contained at the end of this section of the report from Primarily Residential PR6' to 'Recreation and Amenity' and also to make the consequential amendments to the text of the Draft Plan as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p>(i) Amend table 5.1 contained in chapter 5, page 48 to reflect the reduction in site area and potential number of housing units to be delivered as a result of the proposed amendments.</p>	Section 4.2.1 Stage 2 Strategic Flood Risk Assessment	Yes
BSMA5	1. Insert the following text at the end of text of Opportunity Site 5: Back Road, Ballybofey, Section 5.4.2 to	Section 4.2.1 Stage 2	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>read as follows (proposed new text shown in blue):</p> <p>Opportunity Site 5: Back Road, Ballybofey</p> <p>These lands are situated in the town centre core on either side of Back Road and are generally comprised of multiple vacant and derelict properties, many of these forming the rear curtilages of commercial properties fronting onto Main Street. The area also contains a small number of commercial and residential properties. Whilst the central parts of this area are generally rundown in appearance, the area is 'book-ended' at either end by quality developments in the form of Jackson's Hotel in the west, and the Villa Rose Hotel and new Butt Hall Centre to the east. The area is accessed by, and bisected by, the narrow Back Road. Access onto Back Road from the west is via Glenfin Street, but access on its eastern side is not possible at present except for a sub-standard narrow and low archway road onto Main Street. The development pattern in the area does not allow for a two-way road system along the entire Back Road area. However, DCC considers that it is a reasonable objective to seek to achieve a two-way road system from the western edge of Back Road as far as the Villa Rose Hotel roundabout, with the possibility of a one-way road from the roundabout for continuing east-bound traffic linking back up to the Main Street. The Council will encourage the land assembly of the site or part of the site, by a private developer, with a view to the preparation of a masterplan for the redevelopment and regeneration of the area. Policy BS-TC-5 refers.</p> <p>The SFRA identifies a significant portion of the site as falling within Flood Zone A. Having regard to the prime and strategic town centre location of the site, a development plan Justification Test was conducted for this site and concluded that the site passes the justification test for development of 'less vulnerable' land uses such as those identified in the Policy. The Report recommends that the text should be amended to provide that the flood risk assessment already referenced in the policy should explicitly consider residual risks of flooding and attenuation of rainfall during flood events (when flap valves are closed).</p> <p>Policy BS-TC-5 in the Draft LAP also supports the principle of other town-centre compatible uses. Such uses might include residential development and therefore it would be advisable to clarify that residential</p>	Strategic Flood Risk Assessment	

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>development will not be permitted within Flood Zone areas.</p> <p>2. To insert the following text into the first paragraph of Policy BS-TC-5 (text to be deleted shown in strike through, proposed new text shown in blue):</p> <p>It is a policy of the Council to consider proposals for retail, commercial or tourism development on Opportunity Site 5; or for development providing for a combination of some, or all, of the aforementioned uses, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Other town centre-compatible uses shall also be considered in the context of a comprehensive Masterplan, that shall be accompanied by a detailed flood risk assessment of the Masterplan site in accordance with the 'The Planning System and Flood Risk Management Guidelines', November 2009'. Any such Flood Risk Assessment shall consider residual risks of flooding and attenuation of rainfall during flood events (when flap valves are closed).</p> <p>comprehensive flood risk assessment (and appropriate mitigation measures as appropriate), and A comprehensive traffic impact assessment (and appropriate mitigation measures as appropriate) shall also be submitted as part of any proposed development within the Masterplan site. In exceptional circumstances, proposals for minor development may be considered in the absence of a Masterplan where the Planning Authority is satisfied that the overall Masterplan approach would not be prejudiced.</p> <p>1. Proposals shall not prejudice the achievement of the Council's road and pedestrian/cycle access through this area as detailed in Objective BS-TC-2 above.</p> <p>2. Development shall incorporate sufficient car parking to serve the proposed development. In this regard, internalised multi- storey car parking will be encouraged in order to make most efficient use of this brownfield site.</p> <p>3. Development shall make provision for the indicative linked walkway along the River Finn frontage and shall incorporate appropriate areas of seating and proposals for hard and soft landscaping.</p>		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>4. Design shall ensure that strong street frontages are provided along either side of Back Road.</p> <p>5. In general, residential development will not be permitted within Flood Zone areas within the lifetime of this Plan unless otherwise varied/superseded.</p>		
BSMA6	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA6' contained at the end of Table 4.1 in section 4 of this report from 'Economic Development ED3' to 'Recreation and Amenity'.	Section 4.2.1 Stage 2 Strategic Flood Risk Assessment	Yes
BSMA7	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA7' contained at the end of Table 4.1 in section 4 of this report from 'Recreation and Amenity' to 'Established Development.'	BS3	Yes
BSMA8	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA8' contained at the end of Table 4.1 in section 4 of this report from 'Recreation and Amenity' to 'Local Environment'.	BS10	Yes
BSMA9	To amend the zoning of the portion of this site as identified on the map entitled 'Proposed Material Alteration BSMA9' contained at the end of Table 4.1 in section 4 of this report from 'Local Environment' to 'Recreation and Amenity'.	BS14	Yes
BSMA10	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA10' contained at the end of Table 4.1 in section 4 of this report from 'Local Environment' to 'Recreation and Amenity'.	BS16	Yes
BSMA11	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA11' contained at the end of Table 4.1 in section 4 of this report from 'Local Environment' to 'Recreation and Amenity'.	BS17	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
BSMA12	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BSMA12' contained at the end of Table 4.1 in section 4 of this report from 'Local Environment' to 'Recreation and Amenity'.	BS20	Yes
BSMA13	<p>1. Amend para. 5.4.2 in relation to 'Opportunity Site 1 as follows (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>Opportunity Site 1: Ballybofey Town Centre</p> <p>The lands comprising Opp Site 1 are located in the town centre core of Ballybofey, adjacent to the National Primary Road/Main Street and are a prime, high profile opportunity for a major development in the heart of the town centre. The lands are controlled by only a very small number of owners. Notwithstanding these advantages, a number of constraints will have to be addressed and a masterplan approach should be adopted to ensure that the maximum benefit is derived for the town.</p> <p>Most of the lands fall within Flood Zone B as per 'The Planning System and Flood Risk Management Guidelines', November, 2009 as identified in the CFRAMS. There is also an issue with the capacity of the storm sewer network. Accordingly, a comprehensive flood risk assessment shall be required for any development proposals in this area. The identification of the site within Flood Zone B, and the prime town centre location, determines that only retail and commercial uses shall be considered having regard to the contents of Para. 3.5 of the aforementioned Flood Risk Guidelines. Other uses above ground floor level shall be considered on their own merit.</p> <p>The junction of Main Street/Chestnut Road already experiences difficulties in terms of movements on to and off the National Road. Any major development in this area will only add to these issues. Accordingly, any such proposals must be accompanied by a traffic impact assessment and road safety audit. Revised junction arrangements may be required.</p> <p>The Planning Authority considers the existing parking area to the front of the Ballybofey Shopping Centre</p>	BS22	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>as a major opportunity to deliver a quality area of civic/public space for the town. This central area is a fundamental element of Ballybofey town centre and acts as a central hub for the community and for businesses alike. This area has the potential to significantly improve the character, appearance and function of the town from an economic, social and physical perspective Any comprehensive development proposals for the Opp 1 area should provide for such a facility at this location whilst also providing for the replacement of the displaced parking spaces at an alternative location in close proximity to the existing parking area. To clarify, the civic space idea cannot proceed unless and until the parking to be displaced has already been replaced at an adjacent site.</p> <p>Having regard to the proposed relocation of Finn Harps Football Club to the Masterplan Area, Stranorlar, and the central location of the site of the current Finn Park stadium, this site is included within the Opp 1 site. Policy BS-TC-1 refers.</p> <p>2. Amend Policy BS-TC-1 in relation to 'Opportunity Site 1 as follows (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>Policy BS-TC-1:</p> <p>It is a policy of the Council to consider proposals for retail, commercial or tourism development on Opportunity Site 1; or for development providing for a combination of some, or all, of the aforementioned uses, subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals shall only be considered in the context of a comprehensive masterplan, a comprehensive flood risk assessment (and appropriate mitigation measures as appropriate), and a comprehensive traffic impact assessment (and appropriate mitigation measures as appropriate). In exceptional circumstances, proposals for minor development may be considered in the absence of a Masterplan where the Planning Authority is satisfied that the overall masterplan approach will not be prejudiced. The design principles set out below shall form the basis of the terms of reference for a masterplan to guide and inform development of the site:</p> <p>a) Design shall be of high quality, innovative and modern in architectural form so as to provide for</p>		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>landmark buildings and to contribute positively to the urban form. In particular, the existing car parking area to the front of the Ballybofey Shopping Centre may be the location for the development of a quality, designed civic space, subject to advance replacement of parking spaces that will be displaced at suitably convenient location(s).</p> <p>b) Proposals shall provide for a strong riverside frontage along the eastern side of the site.</p> <p>c) Proposals shall incorporate sufficient car parking to serve the proposed development. In this regard, internalised multi- storey car parking will be encouraged in order to make most efficient use of this brownfield site.</p> <p>d) With specific reference to the current Finn Park part of the site, a layout that provides for sufficient set back of frontage at Navenny Street so as to make sufficient provision for a public footpath and associated public lighting and drainage.</p>		
BSMA14	<p>1. Amend the Draft LAP by deleting text as identified at the following locations (deleted text shown in strikethrough, new text in blue):</p> <p><u>a. Section 5.5.1 (second para.)</u></p> <p>For these reasons, and given also the critical mass of the Twin Towns, the LAP identifies a number of sites for economic development purposes. Sites have been identified to the east (Strategic Economic Development Opportunity Sites 1 and Opportunity Site 6), south (Economic Development Site 1) and west (Economic Development Sites 2 and 3) of the towns at locations that would provide for convenient access to the National Primary Road network and also to provide a degree of profile/visibility. The LAP also includes an Objective to identify additional land for economic development on the western fringes of Ballybofey. This proposal is for the long-term and development in this area will only be realised as and when the Ballybofey-Stranorlar Bypass is completed and the current National Primary Road is 'down-graded' in category.</p>	BS24	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p><u>b. Section 5.5.1 (third and fourth paras.)</u></p> <p>The above-noted Strategic Economic Development Opportunity Site (identified on the Land Use Zoning Map as SEDOS 1) is located at Mullindrait to the east of Stranorlar. These lands were zoned for 'Economic Development' in the Ballybofey/Stranorlar Local Area Plan, 2005-2011 and the Council has again identified these lands as representing a Strategic Economic Development Opportunity Site in the context of the above-noted Policy ED-P-15 of the Draft County Development Plan. The lands are bisected by the proposed Ballybofey/Stranorlar Bypass Route Corridor Reservation and the lands to the east of the aforementioned route are also located immediately adjacent to the proposed N15 Lifford to Ballybofey/Stranorlar Route Corridor Reservation.</p> <p>The aforementioned location adjacent to a section of the N15 National Primary Road with a speed limit greater than 60kph presents a key challenge to delivering development on these lands. In these circumstances, access is subject to National Roads Policy restricting new accesses, or the intensification of existing accesses, onto national roads where such a speed limit applies. Consequently, the realisation of the potential of these lands depends on the Council securing consent from Transport Infrastructure Ireland (TII) for a strategic access onto the N15 under the exemption set out in Section 2.6 of the Ministerial Planning Guidelines 'Spatial Planning and National Roads'. The identification of this strategic opportunity and associated access/junction proposal in this Draft LAP is a significant step in doing so. The Council will enter into negotiations with TII in this regard.</p> <p><u>c. Objective BS-ED-1</u></p> <p>It is an objective of the Council to develop lands zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1) for strategic economic development inclusive of identifying an agreed access solution to said lands onto the N15 in consultation with Transport Infrastructure Ireland.</p> <p><u>d. Policy BS-ED-2</u></p>		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	<p>It is a policy of the Council to facilitate economic development proposals of a strategic economic development nature inclusive of proposals related to Class 3 (office); Class 4 (light industrial); Class 5 (wholesale warehouse or repository); manufacturing, information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall dovetail with, and incorporate as necessary, the Ballybofey/Stranorlar Bypass route; and (2.) the proposed N15 Lifford to Ballybofey/Stranorlar Route Corridor Reservation. The Masterplan shall make adequate provision to ensure the protection of residential amenities of existing residential properties situated adjacent to the National Primary Road by means of the identification of adequate buffer zone(s).</p> <p>2. To amend the zoning of the site identified on the map entitled 'Proposed Material Alteration BSMA14' contained at the end of Table 4.1 in section 4 of this report from 'Strategic Economic Development Opportunity Site (SEDOS 1) from 'SEDOS 1' to 'Local Environment'.</p>		
BSMA15	<p>1. Insert new para. at end of Section 5.9.1 (new text shown in blue)</p> <p>As already noted elsewhere in this Section of the LAP, the River Finn running through the Twin Towns is an important asset and feature for the towns. The River creates enormous opportunities for the achievement of quality urban design that provides sympathetic integration with the River, as opposed to development that 'turns its back' on the resource.</p> <p>2. Insert new Policy at end of Section 5.9.1 (new text shown in blue)</p> <p>Policy BS-EH-1:</p> <p>It is a policy of the Council to ensure quality design solutions for developments located adjacent to the River Finn, where such sites are centrally-located in the towns and visible to the public. In general terms, such developments will be required to demonstrate sympathetic integration with the River and, in this</p>	BS25	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Ballybofey-Stranorlar			
	regard, proposals that 'turn their back' on the River will not generally be supported.		
BSMA16	<p>1. Insert new policy Policy BS-H-2 (new text shown in blue)</p> <p>Policy BS-H-2:</p> <p>It is a policy of the Council that any applications for redevelopment of the unfinished estate located generally opposite the estate known as 'The Beeches', Navenny, Ballybofey shall be accompanied by a site specific flood risk assessment.</p> <p>2. Add new notation to Ballybofey-Stranorlar Land Use Zoning Map in the vicinity of the subject site to read as follows: (new text shown in blue)</p> <p>All applications for redevelopment of this area shall be accompanied by a site specific flood risk assessment.</p>	BS26	No

Table 11.4: Collation of the Proposed Material Alterations Relating to Ballyshannon

(NB: Where relevant, mapping for proposed material alterations for Ballyshannon are contained at the end of Table 5.1 in section 5 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
BYMA1	<p>1. Amend para. 6.5.2 on Opportunity Site 1: Business Park at Carrickboy as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>This site comprises approximately 10.7 hectares of land having previously been the location of the IDA Business Park in Ballyshannon. The site contains a number of vacant commercial buildings, the Ballyshannon IT Centre which houses the 999 emergency call centre and an area of undeveloped lands to its most southerly point. Its development has the potential to open up lands for development through the delivery of strategic roads that would improve accessibility and movements south of the river. The site has an existing access point and service road via a local road to West Port which may require improvements in width, alignment and junction arrangement to accommodate significant development. These lands have the potential to provide for a cluster of economic development including enterprise, commercial development, research, innovation, business, health related or education. A small part of the site in the south-eastern corner has been identified as Flood Zone A in the Stage 2 SFRA (refer to flood mapping). Given the small extent of this area, it would be disproportionate to re-zone this area. Rather, a more measured approach in this case would be to require that any potential future development that will encroach towards this part of the site may be required to submit a site specific flood risk assessment with the planning application. Policy BY-ED-1- refers.</p> <p>2. Amend Policy BY-ED-1 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is the policy of the Council to consider proposals for the development of enterprise, commercial development, research, innovation, digital technology, business, health related or education on Opportunity Site 1 (Business Park at Carrickboy), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any development proposals shall make appropriate provision of the delivery of indicative</p>	Section 5.2.1 of CE Report in relation to SFRA (OPP site 1)	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>Strategic Roads. Residential and retail development shall not be permitted at this location.</p> <p>Planning applications for development that will encroach towards the south-eastern part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application.</p>		
BYMA2	<p>1. Amend para. 6.5.2 on Opportunity Site 4: Former Mill and Distillery as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>Located at the water's edge, this brownfield site was originally the location of a former mill and distillery and also housed the office of the Heitons Building Suppliers. The site is approximately 1 hectare and comprises a number of partially demolished buildings and a structure that is on the Record of Protected Structures. This is a prominent waterfront location that adjoins the Donegal Bay SPA and therefore its development involves environmental considerations. It also has a visual relationship with Opportunity Site 4-5 which comprises the pier on the other side of the river and its associated nearby lands identified as Opportunity Site 5. Given its waterfront location, its historical context and its proximity to the town centre, this site has the potential for a mix of development including tourism related and associated small scale commercial/ niche type activities together with potential for limited residential development. Its redevelopment will require a heritage-led approach. The northern portion of the site is located in Flood Zone A (refer to flood mapping) and as such any development proposals for this portion of the site must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development. Policy BY-ED-4 refers.</p> <p>2. Amend Policy BY-ED-4 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is the policy of the Council to consider proposals for the development of tourism related and associated small scale commercial/ niche type activities together with potential for limited residential development at Opportunity Site 4 (Former Mill and Distillery), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Proposals incorporating an</p>	<p>Section 5.2.1</p> <p>of CE Report in relation to SFRA (OPP site 4)</p>	<p>No</p>

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>element of residential development shall provide for a maximum number of 18 units. Any proposals for commercial development comprising a retail element shall be subject to the sequential approach set out in the Draft CDP. In addition, any proposal shall be required to adequately demonstrate (i) the conservation of a protected structure located within the site (ii) massing and scale that is appropriate for this sensitive waterfront location and (iii) that the development will not result in significant environmental impacts on the Donegal Bay SPA and (iv) compliance with the Habitats Directive.</p> <p>Development proposals for the northern half of the site (refer to flood mapping) must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development</p>		
BYMA3	<p>1. Amend para. 6.5.2 on Opportunity Site 5: The Mall Quay as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>Opportunity Site 5: The Mall Quay</p> <p>This site comprises approximately 1 hectare of land and is the location of the pier, which is a Protected Structure together with a number of low level commercial storage buildings. The site is located at the mouth of the River Erne, adjoining the Donegal Bay SPA and facing the archaeologically important Inis Samer Island to the south-west. This site is a key historical location in the town as the pier is a reminder of the importance of Ballyshannon as a thriving port and regional market centre, particularly during the late-eighteenth and the nineteenth centuries. This is a prime site, located at the western edge of the historic street known as The Mall where there is a concentration of historic buildings identified on the Record of Protected Structures and/or National Inventory of Architectural Heritage. The town centre, via The Mall is in ready walking distance of the site and to the immediate north of the site there has been significant investment in recreational infrastructure in the form of open space encircled by a walkway, a children's playground and an outdoor gym. The development of this site for marine, leisure, recreation and tourism related development would improve public access to this historically important site and would add to the network of Ballyshannon's heritage assets and recreational infrastructure that can be availed of by the public and visitors. The western portion of the site is located in Flood Zone A (refer to flood</p>	Section 5.2.1 of CE Report in relation to SFRA (OPP site 5)	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>mapping) and as such any development proposals for this portion of the site must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development Policy BY-ED-5 refers.</p> <p>2. Amend Policy BY-ED-5 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is the policy of the Council to consider proposals for the development of marine, leisure, recreation and tourism related development on Opportunity Site 5 (The Mall Quay), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Any proposal for development shall be required to adequately demonstrate (i) the protection of archaeological records and monuments that may be impacted upon (ii) massing and scale that is appropriate for this sensitive waterfront location (iii) that the development will not result in significant environmental impacts on the Donegal Bay SPA (iv) compliance with the Habitats Directive and (v) adequate public pedestrian and cycle access. Development proposals for the western half of the site (refer to flood mapping) must be 'water-compatible' as defined in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG/OPW, November 2009) including marine, leisure, recreation and tourism related development.</p>		
BYMA4	<p>1. Amend para. 6.4.3 on Opportunity Site 9: Bachelor's Walk as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>Opportunity Site 9: Bachelor's Walk</p> <p>This site comprises approximately 2.5 hectares and is the only town centre Opportunity Site that has not been previously developed. It is located at the northern end of Main Street with road frontage along Bachelor's Walk and it provides an opportunity for sustainable town centre expansion. Its northern boundary adjoins existing residential development. and lands to the immediate West are zoned 'Primarily Residential' (PR1). This site has the potential for a mix of town centre uses to be planned from the southern portion lands closest to the town centre firstly with the sequential development of the remainder of the land. In the event of residential development, the preferred</p>	Section 5.2.1 of CE Report in relation to SFRA (OPP site 9)	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>location is to the most northerly section of the site. An indicative strategic road line traverses the site east-west and links through PR1 and this would provide for primary vehicular access to the site via Bishops Street. The southernmost part of the site is located with the archaeological complex of Ballyshannon. Part of the northern end of the site has been identified as Flood Zone B in the SFRA report. Residential development will not be permitted on this part of the site. Planning applications for other forms of development that will encroach towards the northern part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application. Policy BY-TC-7 refers.</p> <p>2. Amend Policy BY-TC-7 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is the policy of the Council to consider proposals for the development of town centre uses on Opportunity Site 9 (Bachelor's Walk), subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any proposals for part only of the site shall ensure the delivery of the most southern portion of the site first closest to the town centre followed by the incremental development of the remainder of the site. Proposals shall also be able to provide for the indicative strategic roads access that traverses the site and ensure that there will be no negative impact on material associated with the designated archaeological complex.</p> <p>Residential development will not be permitted on the northern part of the site. Planning applications for other forms of development that will encroach towards the northern part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application.</p>		
BYMA5	<p>Insert New Policy BY-ED-7</p> <p>Policy BY-ED-7: It is a policy of the Council to consider proposals for the development of the site zoned as 'Economic Development' at Station Road, and immediately to the south-east of Site PR4, for economic development uses consistent with the zoning objectives for sites zoned for 'Economic Development' in Table 3.1 of the Plan. Planning applications for development that will encroach towards the south-western part of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment with the planning application.</p>	Section 5.2.1 of CE Report in relation to SFRA	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
BYMA6	Amend the zoning of a triangular portion of the 'Strategic Residential Reserve' lands (immediately south of PR6) in the eastern and south-eastern part of the site to 'Recreation and Amenity' to exclude the identified flood zone as identified on the map entitled 'Proposed Material Alteration BYMA6' contained at the end of table 5.1 in section 5 of this report.	Section 5.2.1 of CE Report in relation to SFRA	Yes
BYMA7	Amend the Ballyshannon Land Use Zoning Map to include an indicative pedestrian route along the bypass between the Donegal Road Roundabout and Rossnowlagh Road Roundabout as identified on the map entitled 'Proposed Material Alteration BYMA7' contained at the end of table 5.1 in section 5 of this report.	Section 5.2.2	Yes
BYMA8	Amend the Ballyshannon Land Use Zoning Map to include an indicative greenway route along the old Ballyshannon to Creevy/Rossnowlagh railway as identified on the map entitled 'Proposed Material Alteration BYMA8' contained at the end of table 5.1 in section 5 of this report.	Section 5.2.2	Yes
BYMA9	Amend the Ballyshannon Land Use Zoning Map to include an indicative greenway route along the old Ballyshannon to Bundoran railway as identified on the map entitled 'Proposed Material Alteration BYMA9' contained at the end of table 5.1 in section 5 of this report.	Section 5.2.2	Yes
BYMA10	Include a new objective to support the potential development of greenway/walkway/cycleway projects in Ballyshannon as follows: (text to be deleted shown in strikethrough, new text shown in blue): Objective BY-TMR-6: It is an objective of the Council to secure the development of new greenway/walkway/cycleway projects in Ballyshannon.	Section 5.2.2	No
BYMA11	Include a new policy in the Draft LAP to support the potential development of a new coastal walk to join the Creevy coastal path as follows: Policy BY-TMR-6: It is a policy of the Council to protect established/historic railways in Ballyshannon to allow the development of a network of green infrastructure for potential greenway/walkway/cycleway projects and for recreational development as an important part of the tourism product of the town.	Section 5.2.2	No
BYMA12	Include a new objective in the Draft LAP to support the potential development of a new coastal walk to join the Creevy coastal path as follows: Objective BY-TMR-7: It is an objective of the Council to explore the potential of achieving a coastal walk	Section 5.2.2	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patricks well) and continuing to join the Creevy coastal path.</p>		
BYMA13	<p>Include a new policy in the Draft LAP to support the potential development of a new coastal walk to join the Creevy coastal path as follows:</p> <p>Policy BY-TMR-7: It is the policy of the Council to seek to preserve the route of the potential future coastal walk running from the existing recreation ground on the Mall, to the Abbey Bay (and St Patrick's Well) and continuing to join the Creevy coastal path. Developments shall only be permitted where it can be demonstrated that delivery of the said route shall not be prejudiced.</p>	Section 5.2.2	No
BYMA14	<p>Rezone the subject lands from 'Local Environment' to 'Established Development' as identified on the map entitled 'Proposed Material Alteration BYMA14' contained at the end of table 5.1 in section 5 of this report</p>	BY1	Yes
BYMA15	<p>Amend the zoning of Site PR1 to 'Recreation and Amenity' and also amend the zoning of the lands to the immediate north of site PR1 from 'Local Environment' to 'Recreation and Amenity'. In addition, remove the indicative strategic road route from the subject site (PR1) and the adjoining Opportunity Site 9 as identified on the map entitled 'Proposed Material Alteration BYMA15' contained at the end of table 5.1 in section 5 of this report.</p>	BY2	Yes
BYMA16	<p>Remove the 'Recreation and Amenity' zoning from the subject lands and extend Opportunity Site 5 eastwards to include the subject lands overlooking the Mall Quay and Erne Estuary as identified on the map entitled 'Proposed Material Alteration BYMA16' contained at the end of table 5.1 in section 5 of this report.</p>	BY10	Yes
BYMA17	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration BYMA17' contained at the end of table 5.1 in section 5 of this report from 'Strategic Residential Reserve' and 'Local Environment' to 'Primarily Residential'. It is also recommended to make the consequential amendments to the text of the Draft LAP as follows (in order to reflect the consequential supply of lands zoned for housing):</p> <p>(i) To amend chapter 6, section 6.6.2 and table 6.1, page 76 so that it reads as set out in the text contained at the end of table 5.1 in section 5 of this report.</p>	BY11	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
BYMA18	Extend the river walkway westwards from the footbridge towards Opportunity Site 4 as identified on the map entitled 'Proposed Material Alteration BYMA18' contained at the end of table 5.1 in section 5 of this report.	BY12	Yes
BYMA19	Amend the zoning of the subject lands from 'Local Environment' to 'Established Economic Development' as identified on the map entitled 'Proposed Material Alteration BYMA19' contained at the end of table 5.1 in section 5 of this report.	BY13	Yes
BYMA20	Amend the zoning of the subject lands from 'Local Environment' to 'Economic Development' as identified on the map entitled 'Proposed Material Alteration BYMA20' contained at the end of this section of table 5.1 in section 5 of this report.	BY17	Yes
BYMA21	<ol style="list-style-type: none"> 1. Amend the zoning of the subject lands from 'Local Environment' to Opportunity Site 11 as identified on the map entitled 'Proposed Material Alteration BYMA21' contained at the end of table 5.1 in section 5 of this report and make the consequential amendments to the text of the Draft LAP, including a new policy, as follows (in order to reflect the identification of the subject site as a new Opportunity Site 11). 2. Amend Section 6.4.3 'Opportunity Sites Located Within the Defined Town Centre' as follows: (text to be deleted shown in strikethrough and new text shown in blue): 'A total of 4011 Opportunity Sites have been identified in this LAP due to their potential to contribute to the economic development of Ballyshannon and/or due to their particular strengths, characteristics or requirements.' 3. Amend Section 6.5.2 'Opportunity Sites Located Outside the Defined Town Centre' by the insertion of the following new paragraph (text to be deleted shown in strikethrough and new text shown in blue) Opportunity Site 11: Coolcholly This site comprises approximately 3.093 of greenfield land located at a strategic gateway point into the town, adjacent to the Morning Star roundabout and Bachelor's Walk. It is intended to promote/facilitate development on these lands to maximise their dominant strategic gateway location/entrance to the town. Developments should actively address road frontages and the 	BY24	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>entrance to the town should demark this significant junction by appropriately scaled and designed developments which make a positive contribution to this historic and heritage town. Access to the site shall be from the R231 Regional Road and shall be subject to detailed design proposals. Having regard to the location of the site it has the potential for a range of uses including hotel, industry, warehousing/storage, petrol station and associated services, offices/call centre and R&D but excluding retailing (including convenience, comparison and bulky retailing). Any ancillary convenience retailing associated with a petrol station will be subject to Policy RS-P-10 in the Draft CDP 2018-2024 which restricts any shop associated with a petrol station to 100 sq.m. net retail area. It is important to note that a central portion of the proposed Opp 11 has been identified as Flood Zone B in the Stage 2 Strategic Flood Risk Assessment, prepared by Consultants on behalf of the Council, and as such any potential future development of these lands would need to be cognisant of this.</p> <p>4. Amend Section 6.5.4 Economic Development Policies by inserting the following additional policy (text to be deleted shown in strikethrough and new text shown in blue):</p> <p>Policy BY-ED-7: It is the policy of the Council to consider proposals for hotel, industry, warehousing/storage, petrol station and associated services, offices/call centre and R&D but excludes retailing (including convenience, comparison and bulky retailing) related development on Opportunity Site 11 (Coolcholly), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any proposal for ancillary convenience retailing associated with a petrol station will be subject to Policy RS-P-10 in the Draft CDP 2018-2024 which restricts any shop associated with a petrol station to 100 sq.m. net retail area. Proposals for development on this site will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP 2018-2024. Proposals shall also be required to demonstrate traffic management measures within the site and to the site from the surrounding roads infrastructure.</p>		
BYMA22	<p>1. Amend the text associated with Opportunity Site 1 in Section 6.5.1 of the Draft LAP as follows: (deleted text shown in strikethrough; new text shown in blue)</p>	BY33	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>Opportunity Site 1: Business Park at Carrickboy</p> <p>This site comprises approximately 10.7 hectares of land having previously been the location of the IDA Business Park in Ballyshannon. The site contains a number of vacant commercial buildings, the Ballyshannon IT Centre which houses the 999 emergency call centre and an area of undeveloped lands to its most southerly point. Its development has the potential to open up lands for development through the delivery of strategic roads that would improve accessibility and movements south of the river. The site has an existing access point and service road via a local road to West Port which may require improvements in width, alignment and junction arrangement to accommodate significant development. These lands have the potential to provide for a cluster of economic development including enterprise, commercial development, research, innovation, business, manufacturing, services, IT, start-ups and health related or education. The site is significantly under-utilised at present and the Council will explore the most appropriate means of addressing this issue.</p> <p>2. Amend the text of Policy BY-ED-1 associated with Opportunity Site 1 in Section 6.5.2 of the Draft LAP as follows (deleted text shown in strikethrough; new text shown in blue)</p> <p>Policy BY-ED-1</p> <p>It is the policy of the It is the Policy of the Council to consider proposals for the development of enterprise, commercial development, research, innovation, digital technology, business, manufacturing, services, IT, start-ups and health related or education on Opportunity Site 1 (Business Park at Carrickboy), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria including the requirements of the Habitats Directive and environmental considerations, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Any development proposals shall make appropriate provision of the delivery of indicative Strategic Roads. Residential and retail development shall not be permitted at this location. The Council will explore the most appropriate vehicle with which to promote and market the potential of this site, subject to the identification of appropriate resources.</p>		

Table 11.5: Collation of the Proposed Material Alterations Relating to Bridgend

(NB: Where relevant, mapping for proposed material alterations for Bridgend are contained at the end of Table 6.2 in section 6 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
BEMA1	<p>1. Amend para. 7.5.1 on Strategic Economic Development Opportunity Site by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>'A part of the western area of the site has been identified as falling within Flood Zone B, whilst lands to the north of the site have also been identified as being within Flood Zone A. Development proposals for development that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Such assessments shall be required to address, inter alia, proposals for the attenuation of rainwater and run-off during flood events.'</p> <p>2. Amend Policy BE-ED-1 as below (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>It is a policy of the Council to facilitate economic development proposals of a strategic economic development nature inclusive of proposals related to information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall: (1.) dovetail with, and incorporate as necessary, the Derry-Buncrana Greenway Scheme; and (2.) provide for widening of the public roads to the west and south of the site along those site boundaries.</p> <p>Proposals for development that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Such assessments shall be required to address, inter alia, proposals for the attenuation of rainwater and run-off during flood events.</p>	Section 6.2.1; of CE Report in relation to SFRA	No
BEMA2	<p>1. Amend para. 7.6.1 on Opportunity Site 1 by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue):</p> <p>'Development proposals that will encroach towards the identified flood zone areas of the site (refer to flood</p>	Section 6.2.1; of CE Report in relation to SFRA	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Having regard to the Flood Zone information, residential development will generally not be acceptable at this location.</p> <p>2. Amend Policy BE-OPP-1 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is a policy of the council to consider proposals both for town centre/retail uses and also for general commercial developments, including light industrial, warehouse, wholesale, or storage use, car servicing, on lands identified as Opportunity Site 1 (Opp 1) on the accompanying land use zoning map (Map 1 refers).</p> <p>Development proposals that will encroach towards the identified flood zone areas of the site (refer to flood mapping) may be required to submit a site specific flood risk assessment depending on the scale and position of the development. Having regard to the Flood Zone information, residential development will not generally be acceptable at this location.</p>		
BEMA3	<p>1. Amend the zoning of a part of the northern area of the site identified as Opportunity Site 2 to 'Recreation and Amenity' to exclude the identified Flood Zone A, as identified on the map entitled 'Proposed Material Alteration BEMA3' contained at the end of table 6.2 of section 6 of this report.</p> <p>2. Amend para. 7.6.1 on Opportunity Site 2 by inserting additional final para. as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>'An area to the north of the site that would otherwise appear to logically fall within the boundaries of the site is omitted and newly identified as 'Recreation and Amenity' as this site has been identified as falling within Flood Zone A and subject to localised flooding concerns (refer to flood mapping). Another section of the southern part of the site and running parallel with the local road is identified as falling within Flood Zone B (refer to flood mapping). Residential development will not be permitted on this part of the site. Proposals for other forms of development that will encroach towards this area of the site may be required to submit a site specific flood risk assessment depending on the scale and position of the development.'</p> <p>3. Amend Policy BE-OPP-2 as below (text to be deleted shown in strikethrough, new text shown in blue)</p>	Section 6.2.1; of CE Report in relation to SFRA	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p><u>Opportunity Site 3</u></p> <p>In the SFRA report, a significant portion of the site is identified as being within Flood Zone A and a further portion is identified as falling within Flood Zone B (refer to flood mapping). Consistent with the Flood Guidelines, residential It is a Policy of the Council to consider proposals for the development of residential, light Industrial/commercial, or tourism-related uses; or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area. Proposals for retail development will not be favourably considered unless it can be demonstrated that the proposal would comply with the sequential approach to retail development and retail impact assessment requirements as set out in the County Retail Strategy. Proposals for petrol filling stations/fuel storage depots and amusement arcades/indoor amusement areas or other large scale single use developments shall not be permitted in accordance with the terms of Policy BE-TC-1 above. The undernoted criteria shall apply:</p> <ul style="list-style-type: none"> a) Vehicular access shall only be permitted via the County Road to the east of the site. Pedestrian access shall be required onto both the National Road and County Road; b) Layout and design shall not give rise to sky-lining on the elevated parts of the site. c) Connection to the town sewer following commissioning of the upgraded public treatment works. d) Compatibility of any proposal with an overall cohesive development proposal for the entire Opportunity Site area. An overall site layout plan for the entire Opportunity Site shall be required in this regard. e) Residential development will not be permitted on that part of the site identified as falling within Flood Zone B. Proposals for other forms of development that will encroach towards this area of the site may be required to submit a site specific flood risk assessment depending on the scale and position of the development.' 		
BEMA4	<p>1. Amend para. 7.6.1 on Opportunity Site 3 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>Opportunity Site 3</p> <p>Residential; or Light industrial/commercial; or tourism-related; or development providing for a combination of some, or all, of the aforementioned uses may be considered. This Opportunity Site is situated between</p>	Section 6.2.1; of CE Report in relation to SFRA	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>the main built-up area of Bridgend to the west (with residential development to the north and to the south-west, whilst to the west is located the central open space area proposed in this LAP), and the Strategic Economic Development Opportunity to the east. The site is currently bisected by the narrow L-8041-1 County Road. The site could be developed in one of two ways: (1.) two separate developments either side of the public road, in which case widening of the existing road, together with the provision of a footpath, public lighting and drainage improvements shall be required; or (2.) one consolidated development facilitated by the re-location of the public road to the eastern side of the site and its dedication to Donegal County Council in accordance with the required statutory procedures. The new road line would again be constructed by the developer together with required junction work, associated footpaths, public lighting and drainage.</p> <p>The site is somewhat removed from the public sewer network but developers will be required to identify a suitable route to connect to this network. Finally, it is reasonable to expect that any permitted layout will be required to provide for suitable pedestrian connectivity through to, and from, the proposed public open space area to the west.</p> <p>2. Amend Policy BE-OPP-3 as below (text to be deleted shown in strikethrough, new text shown in blue)</p> <p>It is a Policy of the Planning Authority to consider proposals for the development of residential, light Industrial/commercial, or tourism-related uses; or for development providing for a combination of some, or all, of the aforementioned uses on lands identified as Opportunity Site (Opp 3) subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area. Two development model options shall be considered:</p> <p>a) Two separate developments either side of the public road, in which case the following shall be required:</p> <ul style="list-style-type: none"> (i) widening of the existing L-8041-1 road along its entire length, together with the provision of a footpath, public lighting and drainage improvements as necessary; (ii) the widening of the L-7931-3 road along the southern frontages of the sites, together with the provision of a footpath, public lighting and drainage improvements as necessary; and (iii) improvements to the junction of the L-8041-1 and L-7913-3 roads; or 		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>b) One consolidated development facilitated by the re-location of the public road to the eastern side of the site and constructed to the appropriate standards and its dedication to Donegal County Council in accordance with the required statutory procedures. The new road line would again be constructed by the developer together with required junction work, associated footpaths, public lighting and drainage. The following will apply:</p> <ul style="list-style-type: none"> (i) Proposals for retail development will not be favourably considered unless it can be demonstrated that the proposal would comply with the sequential approach to retail development as set out in the County Retail Strategy. Proposals for petrol filling stations/fuel storage depots and amusement arcades/indoor amusement areas or other large scale single use developments shall not be permitted in accordance with the terms of Policy BE-TC-1. (ii) Connection to the town sewer following commissioning of the upgraded public treatment works. (iii) Creation of a pedestrian link to and from the proposed amenity/open space area to the west. <p>'Development proposals may be required to submit a site specific flood risk assessment to include modelling of the on-site watercourse depending on the scale and position of the development.'</p>		
BEMA5	<p>Delete para. 7.10.1 and replace with the new text below (new text shown in blue).</p> <p>As part of the North-West Greenways Network project, funding was recently allocated under the INTERREG VA programme 2014-2020 for the construction of a Greenway between Derry and Buncrana via Bridgend. A key aim of this project is to deliver high quality, safe Greenway networks, enhancing linkages between communities and promoting sustainable transport opportunities.</p> <p>A Study Area (see Figure 7.5) has been identified for development of Route Options and a Constraints Study and Route Selection process is expected to be carried out in advance of applications for Planning approval with construction also programmed to happen within the life of this Local Area Plan. Public Consultations on the Route Selection process are expected to be carried out in 2018 and the preferred route identified under this process shall be considered in and masterplans or development proposals.</p> <p>This project has the potential to provide both a sustainable transport alternative and enhance recreational opportunities for the residents of the village and visitors alike.</p> <p>During the detailed design phase of this project, there may be opportunities for pedestrian issues as discussed</p>	In house discussions with Trevor Gordon	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	above for the northern side of the National Road to be considered with a view to incorporating such solutions into the design as and where possible and appropriate		
BEMA6	Delete Greenway route identified on Draft LAP Land use Zoning Map.	In house discussions with Trevor Gordon	Yes
BEMA7	<p>1. Add new para. at end of Section 7.5.1</p> <p>'The ambition of providing a greenway between Derry and Bunrana, and passing through Bridgend, is addressed in Section 7.10.1 below. It is likely that the selected route will proceed along the National Primary Road Corridor, or parallel with it, for the entire length of the identified Strategic Economic Development Opportunity Site (SEDOS1). Notwithstanding, there is also an associated ambition in the longer-term to provide another section of greenway within the northern fringes of the SEDOS1 site.'</p> <p>2. Amend Objective BE-ED-1 as follows (text to be deleted shown in black strikethrough, and new text shown in blue).</p> <p>Objective BE-ED-1:</p> <p>It is an objective of the Council to develop the lands zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1) for strategic economic development inclusive of identifying an agreed access solution to said lands onto the N13 in consultation with Transport Infrastructure Ireland and the Council's strategic partners in Northern Ireland. The Council also notes the scope and potential mutual benefits of managing the development of the Bridgend SEDOS 1 site as part of a joint approach with DC&SDC that would also take in the economic development lands on the DC&SDC side, and that would allow for the construction of the Derry-Bunrana Greenway.</p> <p>3. Amend Policy BE-ED-1 as follows (text to be deleted shown in black strikethrough, and new text shown in blue).</p> <p>Policy BE-ED-1:</p> <p>It is a policy of the Council to facilitate economic development proposals of a strategic economic</p>	In house discussions with Trevor Gordon	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>development nature inclusive of proposals related to information technology, international traded services, and high-end services manufacturing on land zoned Strategic Economic Development Opportunity Site 1 (SEDOS 1). Proposals shall only be considered in the context of an agreed Masterplan for the entirety of the Opportunity Site. The Masterplan, and any subsequent development, shall: (1.) dovetail with, and incorporate as necessary, the Derry-Buncrana Greenway Scheme inclusive of potential routes along the northern and southern edges of the site; and (2.) provide for widening of the public roads to the west and south of the site along those site boundaries.</p>		
BEMA8	<p>1. Amend Land Use Zoning Map to identify a further Opportunity Site comprised of the undeveloped section of the Aileach valley estate previously granted permission.</p> <p>2. Insert additional para. at Section 7.6.1</p> <p>Opportunity Site 5</p> <p>Residential. Whilst this site is located on the edge of the village, this site is considered to constitute a modest opportunity for a small residential development having regard to the history of planning permission on the site and the fact that the site does fall within the long-established town boundary.</p> <p>3. Insert additional Policy:</p> <p>Policy BE-OPP-5:</p> <p>It is a Policy of the Planning Authority to consider proposals for residential development subject to compliance with the undernoted criteria, subject to all other relevant policies of the LAP and compliance with the proper planning and sustainable development of the area.</p> <p>a) Provision of a 2m-wide footpath and public lighting along the entire site frontage to connect into the existing footpath to the north of the site.</p> <p>b) Connection to the public sewer following commissioning of the upgraded public treatment works.</p>	In house review	Yes

Table 11.6: Collation of the Proposed Material Alterations Relating to Carndonagh

(NB: Where relevant, mapping for proposed material alterations for Carndonagh are contained at the end of Table 7.1 in section 7 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
CNMA1	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA1' contained at the end Table 7.1 in section 7 of this report, such that lands within 'Primarily Residential' site PR4 are rezoned to 'Recreation and Amenity'.	Section 7.2.1 of CE Report in relation to SFRA	Yes
CNMA2	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA2' contained at the end Table 7.1 in section 7 of this report, such that lands within 'Opportunity Site 6' are rezoned to 'Recreation and Amenity'.	Section 7.2.1 of CE Report in relation to SFRA	Yes
CNMA3	To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration CNMA3' contained at the end of Table 7.1 in section 7 of this report, such that lands within 'Opportunity Site 7' are rezoned to 'Recreation and Amenity'.	Section 7.2.1 of CE Report in relation to SFRA	Yes
CNMA4	To insert a new Policy CN-H-1 into section 8.7.4 that reads as follows (new text in blue): Policy CN-H-1: It is a policy of the Council to require that all proposals for development on 'Primarily Residential' Site PR8 or on the adjoining 'Strategic Residential Reserve' (SRR) lands be accompanied by a site specific flood risk assessment, prepared in accordance with the 'Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) or any subsequent iteration of said guidelines.	Section 7.2.1 of CE Report in relation to SFRA	No
CNMA5	To make consequential amendments to the text of the Draft Plan as follows (in order to reflect the supply of lands zoned for housing): (i.) To amend chapter 8, section 8.7.2, Table 8.1 (page 111) and section 8.7.4 so that they read as set out in the text at the end of Table 7.1 in section 7 of this report.	Section 7.2.1 of CE Report in relation to SFRA	No

Table 11.7: Collation of the Proposed Material Alterations Relating to Donegal Town

(NB: Where relevant, mapping for proposed material alterations for Donegal Town are contained at the end of Table 8.1 in section 8 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
DTMA1	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA1 and DTMA2' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment/Visually Vulnerable' to 'Recreation and Amenity.'	Section 8.2.1 of CE Report; other issues	Yes
DTMA2	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA1 and DTMA2' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment to 'Recreation and Amenity.'	Section 8.2.1 of CE Report; other issues	Yes
DTMA3	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA3' contained at the end of Table 8.1 in section 8 of this report from 'Opportunity Site 3' to 'Recreation and Amenity' and also to clarify the discussive text at section 9.5.3, page 124, headed 'Opportunity Site 3: Drumlonagher' so that it reads as follows (new text in blue, text for deletion in strikethrough):</p> <p>'Opportunity Site 3: Drumlonagher</p> <p>This area comprises 6 5-hectares and is located adjoining the R267 while the N56 bypass route adjoins the northern boundary of the site. The lands are located on the eastern edge of the plan boundary and represent a high profile and key gateway site to the town, whether observed on entrance into the town or by onward journeys to Killybegs, Ballyshannon or Sligo which also dual as the route of the Wild Atlantic Way. Potential uses include enterprise, business, research and innovation, commercial uses and education, civic and/or health provision. The existing Donegal County Council Public Service Centre is located to the east of the site accessed via one key service route which will also provide access for future potential development of the Opportunity Site. The Public Service Centre already provides a landmark building of notable scale and its design and architectural form are of high quality setting a benchmark for the overall development the Opportunity Site. Significant issues are evident in relation to flood risk downstream of the Opportunity site which will necessitate the carrying out a site specific Flood Risk Assessment as part of any proposed</p>	Section 8.2.2 of CE Report in relation to SFRA	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	development. In addition, as well as the need for junction improvement at the R267 will be required in order to accommodate the associated and cumulative volumes of traffic. Policy DT-ED-3 refers'.		
DTMA4	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of Table 8.1 in section 8 of this report from 'Primarily Residential PR4' to 'Recreation and Amenity'.	Section 8.2.3 of CE Report in relation to SFRA	Yes
DTMA5	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of Table 8.1 in section 8 of this report from 'Primarily Residential PR5' to 'Recreation and Amenity'.	Section 8.2.3 of CE Report in relation to SFRA	Yes
DTMA6	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of Table 8.1 in section 8 of this report from 'Primarily Residential PR6' to 'Recreation and Amenity'.	Section 8.2.3 of CE Report in relation to SFRA	Yes
DTMA7	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA4, DTMA5, DTMA6 and DTMA7' contained at the end of Table 8.1 in section 8 of this report from 'Strategic Residential Reserve' to 'Recreation and Amenity'.	Section 8.2.3 of CE Report in relation to SFRA	Yes
DTMA8	Amend chapter 9, section 9.6.2 and table 9.1, page 126 so that it reads as set out in the text at the end of Table 8.1 of the report.	Section 8.2.3 of CE Report in relation to SFRA and; DT2; DT5; DT15	No
DTMA9	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA9' contained at the end of Table 8.1 in section 8 of this report from 'Economic Development' to 'Recreation and Amenity.'	Section 8.2.4 of CE Report in relation to SFRA	No
DTMA10	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA10' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Primarily Residential' and label	DT2	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	the area as 'PR7.'		
DTMA11	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA11 and DTMA12' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Economic Development.'	DT5	Yes
DTMA12	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA11 and DTMA12' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Primarily Residential' and to label the 'Primarily Residential' area as 'PR8.'	DT5	Yes
DTMA13	Amend the Draft LAP to identify an 'Indicative Walkway/ Cycleway' along the Lough Eske Road (L-1915-2) as far as the plan boundary in the townland of Drumrooske West.	DT6	No
DTMA14	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA14' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Opportunity Site 8' and to insert the necessary associated text as follows:</p> <p>(i) Insert additional text in chapter 9 at the end of section 9.5.3, page 124 to state as follows (new text in blue):</p> <p>Opportunity Site 8: The Mullans</p> <p>This area comprises 3.4 hectares of land and is located to the immediate north of the existing Mill Park Hotel. The land is bounded to the east by the national road and to its southern boundary by the old railway line. It exclusively represents a potential opportunity for the future expansion of the existing hotel in order to provide opportunity to increase tourist accommodation capacity and/or facilities in line with expected increases in visitor numbers to the area. Access to the site would not be permitted via the national road network. In lieu, any proposal would be required to show adequate access through the existing access arrangements serving the Mill Park Hotel. Suitable set back from the national road to the east would also be required. The route of the old railway line intervenes the northern boundary of the existing hotel and southern boundary of the site. The land use zoning map identifies an objective to protect the route of the old railway line for the purposes of an indicative walkway/greenway. Any</p>	DT12	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>proposal for development of Opportunity Site 8 would be required to demonstrate integration and delivery of a walkway/greenway along the old railway line for the length of the southern boundary of the site and future- proof it to ensure a viable connection to the remainder of the old railway line to the west. Policy DT-ED-4 refers.</p> <p>(ii) Insert an additional policy in chapter 9, at the end of section 9.5.4, page 125 to state as follows (new text in blue):</p> <p>Policy DT-ED-4: It is a policy of the Council to consider proposals on lands identified as 'Opportunity Site 8' for the expansion of the existing adjoining hotel in order to provide opportunity to increase tourist accommodation capacity and/or facilities in line with expected increases in visitor numbers to the area. Other uses outside of those related to the expansion of the existing hotel campus shall not be permitted. Access to the site shall not be permitted via the national road network. Any proposal for the development of lands shall be required to demonstrate (i) adequate access through the existing access arrangements serving the Mill Park Hotel; (ii) necessary set back from the national road to the east; (iii) the integration and delivery of a walkway/greenway along the old railway line for the length of the southern boundary of the site and to future- proof it to ensure a viable connection to the remainder of the old railway line to the west. Any proposals shall also be required to demonstrate compliance with the Habitats Directive and compliance with all other relevant policies of this plan.</p>		
DTMA15	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA15' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Strategic Residential Reserve.'	DT14	Yes
DTMA16	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA16 and DTMA17' contained at the end of Table 8.1 in section 8 of this report from 'Opportunity Site 1' to 'Future Car Parking' and to make the associated text changes as follows:</p> <p>(i) Insert an additional land use zoning objective at table 3.1, page 12 to identify a new land use zone as 'Future Car Parking' and to include the objective as follows: 'To reserve land for future car parking purposes'.</p>	DT15	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
DTMA17	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA16 and DTMA17' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Opportunity Site 1' and to make the associated text changes as follows:</p> <p>(i) Amend the text relating to 'Opportunity Site 1' in section 9.5.1, page 123 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>'Opportunity Site 1: Revlin</p> <p>This site consists of 6.6 10 hectares and is located along the N56 road leading to Killybegs. The 100kmph speed limit is positioned beyond the Western extremity of the site. The pattern of development in the area along the N56 comprises ribbon form of single dwellings and a ribbon of commercial development including some retail activity which cumulatively results in significant traffic movements on the national secondary road. To the east of the site, a local county road provides access to the established GAA pitch and clusters of residential development. The lands, at their most easterly point are approximately 1km from the Diamond and approximately 0.5 km from the edge of the town centre as it is defined in this LAP. The lands are coastal in their location, adjoining the Donegal Bay SPA and SAC. In addition, there are notable views to be had along the N56/ Wild Atlantic Way of Donegal Bay through Rossylongan Strand and Revlin Point. The lands represent a complex development opportunity in terms of environmental, access, and visual amenity considerations together with their nature at an out-of-town centre location. However, the lands represent an opportunity for the development of tourism related uses, leisure/ recreational, healthcare, medical facility educational and office accommodation in conjunction with limited residential development of up to 5 low density residential units at a location that will not require pumping for waste water treatment. Policy DT-ED-1- refers.'</p> <p>(ii) Amend Policy DT-ED-1 in section 9.5.3, page 124 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>'Policy DT-ED-1:</p> <p>It is a policy of the Council to consider proposals on Opportunity Site 1 (Revlin) for the development of</p>	DT15	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>tourism related uses, leisure/ recreational, healthcare, medical facility, educational and office accommodation in conjunction with limited residential development of up to 5 low density residential units at a location that will not require pumping for waste water treatment; or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, the requirements of the Habitats Directive, subject to all other relevant policies of the LAP including environmental considerations and compliance with the proper planning and sustainable development of the area. Having regard to the availability of other lands within and closer to the town centre, retail development will not be acceptable on this Opportunity Site. Any proposed development will be required to demonstrate suitable access onto the county road to the east together with realignment and appropriate upgrade at the junction of that county road onto the N56 and will be required to demonstrate that the volumes and traffic movements associated with the proposed development will not have a negative impact on the capacity and safety of the N56. In addition, any proposed development will be required to demonstrate a layout that ensures the retention of critical views to Donegal Bay from the N56 and Wild Atlantic Way. Development proposals on the western portion of the lands shall also demonstrate suitable integration into the receiving landscape through appropriate building design, height and composition as well as consideration of layout, levels, use of contours and landscaping.</p>		
DTMA18	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA18' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Established Development.'</p>	DT16	Yes
DTMA19	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA19' contained at the end of Table 8.1 in section 8 of this report, in order to include the area delineated, as 'Town Centre' as well as remaining as part of 'Opportunity Site 2,' on both the land use zoning map and on the town centre insert map and to make the following associated text changes:</p> <p>(j) Amend the text relating to 'Opportunity Site 2' in section 9.5.2, page 123/124 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>'Opportunity Site 2: The Mullans</p> <p>This site consists of approximately 11 hectares. It comprises lands to the south east of the site that are</p>	DT18	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>identified as being within the 'Town Centre' and the remainder of the lands are It is located immediately North West of the defined town centre between the regional road known as the Lough Eske Road and the route of the N56 bypass. Established surrounding development comprises a number of long established residential properties fronting onto the Lough Eske Road and an area of mixed use development at Drumrooske on the North Eastern boundary. This The land that immediately adjoins adjoin the town centre part of the 'Opportunity Site' and provides an opportunity for business, offices, recreation and tourism related uses. It and also has potential for the development of retailing of bulky comparison goods only. located on the south western portion of the site closest to the town centre. The provision of other comparison goods at this part of the site that are not of bulky nature may have a detrimental impact on the vitality of the town centre and therefore shall not be permitted on this Opportunity Site the area located outside the defined 'Town Centre.' In addition it has potential for business uses, offices, recreation and tourism related uses. Uses appropriate to 'town centre' will be considered within the area located in the defined 'Town Centre.' The lands are significant in area and therefore a comprehensive strategy for the long term delivery of the entire site shall be required through the preparation of a masterplan as part of any proposals coming forward. In particular, proposals for the area defined as forming part of the 'Town Centre' will be required to demonstrate design and layout linkages to the existing town centre including provision on site of public realm/open space, walking and cycling and including a strategy to address the potential physical obstacles to the pedestrian/cyclist as a result of the road network/infrastructure to serve the overall site. In this regard, proposals to manage the interface of significant roads infrastructure and pedestrian/ cycle/car will be required so as to ensure that the area identified as 'Town Centre' performs effectively as a new extension to the existing retail core and is readily and easily accessible on foot or by bicycle. In addition, proposals will be required to provide a set back of at least 50 metres form the N56. Policy DT-ED-2 refers'.</p> <p>(ii) Amend Policy DT-ED-2 relating to 'Opportunity Site 2' in section 9.5.4, page 124/125 so that it reads as follows (text for deletion shown in strikethrough; new text shown in blue):</p> <p>Policy DT-ED-2:</p> <p>It is a policy of the Council to consider (i) proposals for the development of retailing (of bulky comparison goods only), business uses, offices, recreation, tourism related uses on that part of Opportunity Site 2 (The Mullans) located outside the defined 'Town Centre'; or for development providing for a combination of</p>		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>some, or all, of the aforementioned uses and; (ii) Uses appropriate to town centre on that part of 'Opportunity Site 2' located within the defined 'Town Centre'. Proposals on any part of 'Opportunity Site' shall demonstrate subject to compliance with the undernoted criteria and the requirements of the Habitats Directive, and be subject to all other relevant policies of the LAP including environmental considerations and compliance with the proper planning and sustainable development of the area. In order to protect and strengthen the vitality of the town centre, retailing of comparison goods that are not bulky goods is not appropriate. Bulky retail development will only be permitted on the south western portion of the site at a location closest to the town centre. In particular, proposals for the area defined as forming part of the 'Town Centre' will be required to demonstrate design and layout linkages to the existing town centre including provision on site of public realm/open space, walking and cycling and including a strategy to address the potential physical obstacles to the pedestrian/cyclist as a result of the road networks/infrastructure to serve the overall site. The overall development of the lands will require a masterplan outlining a strategy for the integration of public and civic space including a walking and cycling strategy throughout the development providing for the integration of the route of the former railway line and linking to the town centre. A masterplan shall also demonstrate a suitable vehicular access of sufficient capacity to service the entire site as well as a 50 metre set back from the N56. Any proposal within the site will ensure a sufficient buffer between established residential development along Lough Eske Road and the proposed development in order to protect residential amenities. The lands adjoin an area of flood risk to the north eastern boundary and an area of predicted pluvial flooding at the south-eastern corner of the site and therefore any proposed development will be required to comply with the flood risk management objectives and policies of this Plan.</p>		
DTMA20	<p>Amend the Draft LAP in relation to greenways as follows:</p> <p>(i) To amend the 'Indicative Walkways/ Cycleways' delineated on the land use zoning map at the coastline south of Killybegs Road so as to extend as far out as the plan boundary and; to extend the delineated 'walkway/cycleway' from the Golf Course Road as far out as the plan boundary at St Ernans.</p> <p>(ii) To insert an additional objective at section 9.9.2, page 133 so as to state:</p> <p>Objective DT-EH-3: It is an objective of the Council to explore potential greenway connections in</p>	DT19	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	partnership with other organisations and interested groups at key locations including the Old Railway line to Killybegs; Bluestack Way/Harveys Point; Old Railway to Barnesmore; Bank Walk to Rossylongan and; to St Ernans.		
DTMA21	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA21' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' and 'Visually Vulnerable' to 'Strategic Residential Reserve.'	DT21	Yes
DTMA22	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA22 and DTMA23' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Strategic Residential Reserve.'	DT21	Yes
DTMA23	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA22 and DTMA23' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Recreation and Amenity.'	DT21	Yes
DTMA24	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA24 and DTMA25' contained at the end of Table 8.1 in section 8 of this report from 'Recreation and Amenity' to 'Opportunity Site 4'.	DT23	Yes
DTMA25	<p>Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA24 and DTMA25' contained at the end of Table 8.1 in section 8 of this report from 'Opportunity Site 4' to 'Recreation and Amenity' and amend the associated text as follows:</p> <p>(i) Amend the text at 9.4.5, page 120 as follows (new text in blue; text for deletion shown in strikethrough):</p> <p>'Opportunity Site 4: Milltown</p> <p>This Opportunity Site comprises circa 7-8 6 hectares. It is located within the defined town centre and is a brownfield site and it comprises a number of disused buildings as well as the Magee factory and office block. It is bounded by the River Eske to the South, Tirchonail Street to the west and Railway Road to the</p>	DT23	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>north. An indicative strategic road line marks the eastern boundary. A narrow laneway traverses through the centre from the west to the east. The general area is evidenced as having a fluvial flood risk in the OPW's CFRAMs programme and in line with the guidelines entitled, 'The Planning System and Flood Risk Management' the development of these lands is considered to be required to achieve the proper planning and sustainable development of Donegal Town. Flood risk has consequently informed the extent of the Opportunity Site identified and the types of uses that may considered. Having regard to the extent of flood risk, the types of uses that may be considered within the identified Opportunity Site are town centre uses excluding the highly vulnerable uses identified in the Draft CDP (Table 5.4.1 of the CDP 2012 refers). Chapter 3 of this LAP sets out the policy context for flood risk assessment in the consideration of applications for planning permission and in this regard the objectives and policies of the Draft CDP will be applied.</p> <p>In addition, an area of 'Recreation and Amenity' has been identified within the centre of Opportunity Site 4 and also on lands to the south intervening Opportunity Site 4 and the river. These This location is locations are associated with the area of highest probability of flooding. This area of 'Recreation and Amenity' has potential to form a linear urban and riverside park as an important resource for the town. Given the nature of the site as a strategically important town centre regeneration site, any proposals for the lands will require the submission of a masterplan for an overall concept to integrate the development potential of Opportunity Site 4 and the potential of the adjoining 'Recreation and Amenity' lands as future linear riverine urban parkland. There are also significant environmental considerations to be taken into account in the consideration of any proposals at Opportunity Site 4 as the Lough Eske and Ardnamona SAC is located along the River Eske and it includes several important habitats listed on Annex I of the EU Habitats Directive and supports a number of important species as listed on Annex II of the Directive including Atlantic Salmon and Freshwater Pearl Mussel. In addition, the Donegal Bay (Murvagh) SAC and Donegal Bay SPA are designated from Bridge Street'.</p> <p>(ii) Amend Policy DT-TC-3 at 9.4.7, page 122 as follows (new text in blue; text for deletion shown in strikethrough):</p>		

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>'Policy DT- TC-3:</p> <p>It is the policy of the Council to consider proposals for the development of town centre uses excluding highly vulnerable development types as defined in the Draft CDP, table 5.4.1, on Opportunity Site 4 (Milltown), or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, the requirements of the Habitats Directive, all other relevant policies of the LAP including environmental considerations and taken in the context of the proper planning and sustainable development of the area. Any proposal for development shall be required to provide for a masterplan relating to the 'Masterplan Area' identified on Map 6. The masterplan shall set out an overall layout concept to integrate the development potential of the Opportunity Site and the potential of identified 'Recreation and Amenity' lands as future active parkland, including a suitably located pedestrian bridge crossing. Any masterplan and proposal made shall also (i) demonstrate suitable vehicular access to the site including provision for the indicative strategic road link identified on Map 6 and located to the east of the site (ii) provide for indicative pedestrian linkages identified on Map 6 (iii) submit an independent 'Flood Risk Assessment' and be in compliance with the guidelines entitled, 'The Planning System and Flood Risk Assessment', published 2009 including appropriately satisfying the requirements of the justification test at project level FRA (iv) demonstrate integration of open space/ civic space/ walkways/ cycleways within the development proposal and; (v) demonstrate a high quality urban environment</p>		
DTMA26	<p>To amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration DTMA26' contained at the end of Table 8.1 in section 8 of this report from 'Local Environment' to 'Opportunity Site 9' and to amend the text accordingly as follows:</p> <p>(i) Insert additional text in chapter 9 at the end of section 9.5.3, page 124 to state as follows (new text in blue):</p> <p>Opportunity Site 9: Drumlonagher adjacent to Lidl Foodstore</p> <p>The area comprises 2.7 hectares and is located to adjacent to the existing Lidl Foodstore, a single dwelling and an area of existing economic development. The lands are located on the eastern edge of the town and form the end point of an area of mixed use development types. The lands represent a gateway location</p>	DT24	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
	<p>that have the potential for tourism, leisure and economic type developments that are more appropriate for edge of town activity and that do not conflict with the objectives for town centre regeneration. There are traffic and transport issues associated with the future development of this site and options in this regard will vary dependant on the specific uses that come forward and the associated traffic arising, its intensity and its potential interaction with existing and planned developments and importantly the TEN-T network. Policy DT-ED-5 refers.</p> <p>(ii) Insert an additional policy in chapter 9, at the end of section 9.5.4, page 125 to state as follows (new text in blue):</p> <p>Policy DT-ED-5: It is a policy of the Council to consider proposals on lands identified as Opportunity Site 9 for tourism, leisure and economic type developments; or for development providing for a combination of some, or all, of the aforementioned uses. Any proposed development types shall be required to demonstrate appropriateness as an edge of town activity and that will not conflict with the objectives of this LAP for town centre regeneration. In addition, any proposals for development shall address the traffic and transport associated with the future development of this site and options in this regard will vary dependant on the specific uses that come forward and the associated traffic arising, its intensity and its potential interaction with existing and planned developments and importantly the TEN-T network.</p>		

Table 11.8: Collation of the Proposed Material Alterations Relating to Killybegs

(NB: Where relevant, mapping for proposed material alterations for Killybegs are contained at the end of Table 9.4 in section 9 of this Report)

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Killybegs			
KBMA1	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA1' contained at the end of table 9.4 in section 9 of this report such that a small part of the 'Community' zoning is amended to 'Recreation and Amenity'.	Section 9.2.1 of CE Report in relation to SFRA	Yes
KBMA2	Amend the wording of Policy KB-TC-1 as follows (new text in blue): 'It is a policy of the Council to consider proposals for the development of harbour-related, commercial or tourism-related uses on Opportunity Site 1, or for development providing for a combination of some, or all, of the aforementioned uses subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. All proposals for development on Opportunity Site 1 must fully address any potential safety issues at this waterside location and must fully address all flood risk issues'.	Section 9.2.1 of CE Report in relation to SFRA	No
KBMA3	Amend the wording of Policy KB-TC-2 as follows (new text in blue): 'It is a policy of the Council to consider proposals for a mix of town centre compatible uses on Opportunity Sites 2, 3 and 4 subject to compliance with the undernoted criteria, all other relevant policies of the LAP and taken in the context of the proper planning and sustainable development of the area. Proposals for standalone residential development will not be considered. Development proposals on these sites must be designed to fully address the harbour setting and must demonstrably contribute towards the regeneration and revitalisation of the town centre. Development proposals must also be designed to address all potential flood risk issues'.	Section 9.2.1 of CE Report in relation to SFRA	No
KBMA4	Amend Map No. 7 (Killybegs) of the Draft Local Area Plan to show the route of the proposed Outer Relief	Section 9.2.2 of	Yes

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Killybegs			
	Road and amend the map legend accordingly.	CE Report	
KBMA5	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA5' contained at the end of table 9.4 in section 9 of this report such that the 'Recreation and Amenity', 'Visually Vulnerable' and 'Port/Harbour Related Activities' zonings be amended to reflect those zonings presented to Members on 25 th September 2017.	Table 9.1 of CE Report	Yes
KBMA6	Amend the zoning of the lands identified on the map entitled 'Proposed Material Alteration KBMA6' contained at the end of this section of the report from 'Strategic Residential Reserve' to 'Low Density Residential' and label the area as 'LDR'.	Table 9.2 of CE Report	Yes
KBMA7	<p>Make consequential amendments to the text of the Draft Plan as follows (in order to reflect the supply of lands zoned for housing):</p> <p>(i.) To amend chapter 10, section 10.6.2 and table 10.1, page 144 so that it reads as set out in the text at the end of table 9.4 in section 9 of this report.</p>	Table 9.2 of CE Report	No
KBMA8	<p>Insert a new policy KB-H-4 into the Draft LAP to read as follows –</p> <p>Policy KB-H-4: It is a policy of the Council to consider proposals for Low Density Residential development (maximum of 8 residential dwellings per hectare) on the site denoted LDR on Map No. 7 of this LAP. All proposals for development of this site must make provision for, inter alia (a.) access via the northern end of the site (b.) the upgrade and widening of the existing road along the northern site boundary, (c.) the installation of pedestrian footpaths that link the site with existing pedestrian footpaths in the locality, (d.) the installation of appropriate public lighting within the site and along the widened roadway to the north of the site and (e.) the installation of appropriate storm water attenuation systems on site. All proposals for development on this site must otherwise comply with all other relevant policies of this LAP.</p>	Table 9.2 of CE Report	No
KBMA9	It is recommended that the text of Policy KB-ED-1 be amended as follows (new text in blue):	Table 9.3 of CE Report and;	No

Material Alteration Ref. No	Material Alteration	Related section of CE Report and/or related submission	Mapped Yes/No
Killybegs			
	"It is a policy of the Council to consider proposals for appropriate new commercial developments, including industrial uses, (or proposals for extensions to or redevelopment of existing commercial/industrial uses) on lands zoned 'Economic Development' on the accompanying land-use zoning map (see Map 7), subject to compliance with all relevant policies of this Local Area Plan. Any development proposals located in close proximity to the existing lake within the area zoned Economic Development must be designed and configured so as to preserve the visual amenities of the lake and its immediate environs ".	KB145	
KBMA10	<p>Include a new objective and policy in the Draft LAP to support the potential development of greenway/walkway/cycleway projects in Killybegs as follows:</p> <p>Objective KB-TMR-2: It is an objective of the Council to support the potential development of new greenway/walkway/cycleway projects in Killybegs.</p> <p>Policy KB-TMR-5: It is a policy of the Council to protect established/historic railways in Killybegs to develop a network of green infrastructure for potential greenway/walkway/cycleway projects and for recreational development as an important part of the tourism product of the town.</p>	Table 9.3 of CE Report and; KB145	No
KBMA11	Amend the Killybegs town boundary to incorporate the lands indicated on the map entitled 'Proposed Material Alteration KBMA11' contained at the end of this section of the report and include said lands within the 'Economic Development' zoning.	KB818	Yes
KBMA12	Rezone the lands indicated on the map entitled 'Proposed Material Alteration KBMA12' contained at the end of table 9.4 in section 9 of this report from 'Amenity/Open Space' to 'Established Development'.	KB828	Yes

**APPENDIX A- Text and Changes Associated with Material
Alteration Ref. GENMA1**

Appendix A
Text and Changes Associated with Material Alteration Ref. GENMA1

- (i) To amend the text in chapter 2, section 2.1.1, page 7, last paragraph, so that it reads as follows:
 'The total housing units that could be supplied from the set Housing Land Requirement set out in the Draft CDP for all of County Donegal up to 2024 is 7,752 no. units as set out in 'The Core Strategy Table' (contained in Chapter 2, Part A of the Draft CDP- Table 2.6). The Core Strategy allocation for housing in the strategic towns is 2,628 no. units of which circa ~~1,440~~ 1553 no. units will be provided in the seven towns over the lifetime of this LAP (up to 2024).
- (ii) To amend table 2.3 contained in chapter 2, page 9 so that it reads as follows:

LAP Towns	Core Strategy Population Allocation to 2024	Housing Land Requirement (ha) (set out in Draft CDP)	No. of Housing Units Required (set out in Draft CDP)	Existing zoning (ha) (As at 1st February 2017)	Amount of land zoned Primarily Residential in this LAP (ha)	Amount of land zoned Low Density Residential in this LAP (ha)	Amount of land zoned in this LAP as Mixed Use/Opp Site with specified residential development potential (ha)	Potential Yield of housing units from land zoned Primarily Residential in this LAP	Potential Yield of housing units from land zoned Low Density Residential in this LAP	Potential Yield of housing units from land identified as Mixed Use/Opp Site in this LAP	Shortfall/ Excess in Housing Units in this LAP
An Clochán Liath (Dungloe)	210	10	120	5.1	12.87	0	0	142 154	0	0	+22 34
Ballybofey-Stranorlar	838	39	468	10.3	24.14	4.66	12.99	327 286	35	156	+15 9
Ballyshannon	419	19	228	0	17.1 18.2	0	1.3	204 217	0	24	0 +13
Carndonagh	460	21	252	11.5	23.1 12.2	0	8.52	277 146	0	102	-4
Donegal Town	461	21	252	6.8	22 23.5	0	6.6 0	263 282	0	5 0	+16 30
Killybegs	210	10	120	0	10.9	2.0	0.3	131	16	4	+15 31

**APPENDIX B- Text associated with Material Alteration
Ref. GENMA2**

Appendix B:
Text associated with Ref. GENMA2

Proposed Material Alteration Ref. GENMA2:

To amend the LAP so as to incorporate the outputs of the Stage 2 Strategic Flood Risk Assessment as follows:

- (i) To amend chapter 3, section 3.6.1, page 18 and 19 so that it reads as follows:

'Flood events are a natural phenomenon which can never be entirely prevented. However, the planning system can play a key role in managing flood risk by ensuring that vulnerable developments are not located in areas prone to flooding and further ensuring that developments do not reduce the natural storage capacity of flood plains or significantly increase surface water runoff rates above natural rates.

In 2007 the EU Floods Directive (2007/60/EC) became operational. This directive aimed to reduce the adverse consequences of flooding on human health, the environment, cultural heritage and economic activity. The directive required Member States to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this risk. Subsequent to this the following were published and these inform the policy for flood risk assessment in Ireland.

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The Office of Public Works (OPW) has been designated as the lead agency for flood risk management in Ireland and the competent authority for the implementation of the Floods Directive. Commencing in 2011 the OPW is undertaking a National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme which aims to: identify and map existing flood hazard and flood risk in certain Areas for Further Assessment (AFA), set out viable options for the effective and sustainable management of flood risk in said AFAs, and prepare Flood Risk Management Plans (FRMP's) including strategies and actions for the cost effective and sustainable management of existing and future flood risk in the AFAs.

'To inform the preparation of this LAP, the Planning Authority has ~~undertaken a review of the available flood risk information in order to identify any flooding or surface water management issues through the best available data from the aforementioned Office of Public Works (OPW) Catchment Flood Risk Assessment and Management (CFRAM) Studies and the accompanying Draft Final Flood Hazard and Risk Maps¹~~ prepared a Stage 2, Strategic Flood Risk Assessment in accordance with the Planning System and Flood Risk Management-Guidelines. The SFRA covers each of the seven towns and is a background document to the LAP. The SFRA resulted in the preparation of mapping in respect of flood extents (Flood zones A and B) and these are inserted at the relevant section of the LAP on each town. The flood zone mapping generated by the SFRA ~~CFRAMS Studies~~ has assisted in the application of the sequential approach to zoning as advocated in the Planning System and Flood Risk Management Guidelines for Planning

¹ **DISCLAIMER** This LAP has been prepared in compliance with the Planning System and Flood Risk Management Guidelines. It should be noted however, that the content of the LAP in relation to flooding has been based on the best available data at the time of preparation, which may be subject to change based on more up to date and relevant flood risk information becoming available during the lifetime of the Local Area Plan. All information in relation to flood risk is provided for general policy guidance only. All landowners and developers are instructed that Donegal County Council can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Furthermore owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands in which they have an interest prior to making planning or development decisions. For further information on the status of OPW flood mapping, refer to www.cfram.ie

Authorities (2009), and where necessary the Justification Test, to appraise sites for suitable land zonings and identify how flood risk can be managed as part of the LAP. [In addition to the flood risk management policies set out under Appendix 1, additional flood risk management policies to address issues that are specific to Carndonagh are set out in Chapter 8 of this LAP.](#)

The Draft CDP contains the strategic planning framework and detailed objectives and policy measures in terms of addressing potential flood risk and these objectives and policies shall apply to development proposals within the seven LAP towns. For ease of reference therefore, the flooding objectives and policies of the Draft CDP have been restated in Appendix 1 of this LAP.

~~Of the seven towns covered by this LAP, 5 are identified as AFA's (An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Carndonagh, Donegal Town and Killybegs) within the CFRAM programme and the relevant mapping in relation to each is contained in the relevant town chapter. In addition to the flood risk management policies set out under Appendix 1, additional flood risk management policies to address issues that are specific to Carndonagh are set out in Chapter 8 of this LAP.~~

~~It should be noted that the CFRAM mapping used to define the flood zones for this LAP are at Draft Final stage and may be subject to change. However the CFRAM mapping is the most comprehensive flood zone mapping available for the county and is considered appropriate for use as a strategic overview of flood risk within the county. Further information on the CFRAM studies is available at www.cfram.ie. The flood maps are 'predictive' flood maps, as they provide predicted flood extents and other information for a flood event that has an estimated probability of occurrence, rather than information on floods that have occurred in the past.'~~

- (ii) Replace all CFRAM mapping with the Flood Zone mapping contained within the Stage 2 Strategic Flood Risk Assessment.
- (iii) Amend section 4.7.1, page 31 under the header 'Flooding' in respect of An Clochán Liath so that it reads as follows:

'Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. Similarly, the Authority will have due regard to the ~~CFRAMS An Clochán Liath (Dungloe) Fluvial Flood Extents mapping~~ [arising from the SFRA](#) where necessary in the assessment of planning applications during the life of this LAP. The [flood extents](#) mapping for ~~An~~ An Clochán Liath (Dungloe) is re-produced below for ease of reference'.

- (iv) Amend section 5.7.1, page 52 under the header 'Flooding' in respect of Ballybofey-Stranorlar so that it reads as follows:

'Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and

- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. ~~In this regard, Ballybofey-Stranorlar is identified as an Area of Further Assessment (AFA) in the CFRAMS study. Figures 5.3, 5.4, 5.5 and 5.6 sourced from OPW CFRAMS study show the probability of fluvial flood extents within the town centre in Ballybofey/Stranorlar and further mapping for the outer areas of the towns can be viewed at www.maps.opw.ie/floodplans.~~ Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Ballybofey-Stranorlar is re-produced below for ease of reference'.

[As an informative, an additional map is also provided below identifying the extent of the flood embankments in the centre of Ballybofey.](#)

- (v) Amend section 6.7.1, page 77 and 78 under the header 'Flooding' in respect of Ballyshannon so that it reads as follows:

Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. ~~In this regard, Ballyshannon was not identified as an Area of Further Assessment (AFA) in the CFRAMS study. Notwithstanding, proposals for development in Ballyshannon will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP (Appendix A refers).~~ Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Ballyshannon is re-produced below for ease of reference'.

- (vi) Amend section 7.7.1, page 96 under the header 'Flooding' in respect of Bridgend so that it reads as follows:

Flooding

Chapter 3, section 3.6 of this LAP deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section the Draft CDP will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3, section 3.6 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of](#)

a Stage 2 Strategic Flood Risk Assessment CFRAMS study as the best available evidence regarding flood risk in each area. In this regard, Bridgend was not identified as an Area of Further Assessment (AFA) in the CFRAMS study. Notwithstanding, as outlined in section 3.6 of this LAP, proposals for development will be required to comply with the flood risk assessment and management objectives and policies set out in the Draft CDP (Appendix A refers). Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Bridgend is re-produced below for ease of reference'.

- (vii) Amend section 8.8.2, page 112 under the header 'Flooding' in respect of Carndonagh so that it reads as follows:

'Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 of this LAP notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the outputs of a Stage 2 Strategic Flood Risk Assessment. CFRAMS study as the best available evidence regarding flood risk in each area. In this regard, It must also be noted that Carndonagh was identified as an Area for Further Assessment (AFA) in the OPW CFRAMS study and the preferred measure arising from the assessment was the progression of the Carndonagh Flood Relief Scheme (comprising storage on the Ballywilly Brook, hard defences, channel modification and replacement of a culvert on the Carndonagh watercourse) to project-level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the In terms of development management, the Planning Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. CFRAMS Carndonagh Flood Extents mapping where necessary in the assessment of planning applications during the life of this LAP. The mapping for Carndonagh is re-produced below for ease of reference (Figure 8-5). The flood extents mapping for Carndonagh is re-produced below for ease of reference'.

- (viii) Amend section 9.7.1, page 128 under the header 'Flooding' in respect of Donegal Town so that it reads as follows:

Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study as the best available evidence regarding flood risk in each area. In this regard, Donegal Town is identified as an Area of Further Assessment (AFA) in the CFRAMS study. Figures 9.1 and 9.2 sourced from OPW CFRAMS study show the probability of fluvial flood extents within the town centre in Donegal Town and further mapping for the outer areas of the town can be viewed at

www.maps.opw.ie/floodplans. Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Donegal Town is re-produced below for ease of reference'.

- (ix) Amend section 10.7.2, page 145 under the header 'Flooding' in respect of Killybegs so that it reads as follows:

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment](#) ~~CFRAMS study~~ as the best available evidence regarding flood risk in each area. ~~In this regard, It must also be noted that~~ Killybegs was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Killybegs Flood Relief Scheme, comprising hard defences, to project-level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. ~~Similarly, the Authority will have due regard to the CFRAMS Killybegs Flood Extents mapping where necessary in the assessment of planning applications during the life of this LAP. The mapping for Killybegs is re-produced below for ease of reference (Figures 10.2-10.4 refer).~~ [In terms of development management, the Planning Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Killybegs is re-produced below for ease of reference'.](#)

- (x) Amend the Environmental Report at section 7.3, page 168 so that it reads as follows:

' 7.3 Strategic and Policy Framework within the Local Area Plan

~~The Draft County Development Plan 2018-2024 (the Draft CDP) considers that the Draft Flood Risk Management Plans for UoM 1,35 and 36 and the associated Flood Hazard Mapping collectively constitute a strategic flood risk management plan for the County representing the best information currently available for the future management of development in Donegal vis-à-vis flood risk. In this regard the Draft LAP has utilised Flood Risk Management Plans and Flood Hazard Mapping as a strategic framework to inform zoning designations to guide the location of new development and infrastructure.—A Stage 1 Strategic Flood Risk Assessment (SFRA) was carried out in respect of the Draft County Donegal Development Plan 2018- 2024 and it recommended the need for a stage 2 SFRA in respect of the seven towns covered by the LAP. As a result a Stage 2 SFRA has been prepared in accordance with the Planning System and Flood Risk Management-Guidelines. The SFRA covers each of the seven towns and is a background document to the LAP. The SFRA resulted in the preparation of mapping in respect of flood extents (Flood zones A and B) and these are inserted at the relevant section of the core document of the LAP on each town.~~

The Draft LAP sets out an overall strategy for the proper planning and sustainable development of the seven towns in the context of the Draft CDP. The general development management policies and standards of the Draft CDP are applicable to the Draft LAP. Chapter 3 of the Draft LAP deals with the issue of flooding generally for the seven towns and the rationale and policy framework contained in the Flooding Section of the Draft CDP will be applied. In this regard, management of Flood Risk in the Draft LAP is subject to the aims, objectives and policies set out in the Draft Plan.

In identifying settlement boundaries for the Draft LAP, the Planning Authority has had due regard to the [outputs of the SFRA CFRAMS study](#) as the best available evidence regarding flood risk in each of the seven towns, as described below:-

An Clochán Liath (Dungloe)

An Clochán Liath has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Ballybofey-Stranorlar

Ballybofey-Stranorlar was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Ballybofey & Stranorlar Flood Relief Scheme: Option 3, comprising hard defences and improvement of channel conveyance, to project level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the Planning Authority will have due regard to the CFRAMS Ballybofey-Stranorlar Flood Extents mapping where necessary in the assessment of planning applications during the life of the LAP. Figure 7.1 sourced from OPW CFRAMS study shows the probability of flood extents within the town centre in Ballybofey-Stranorlar and further mapping for the outer areas of the town can be viewed at www.maps.opw.ie/floodplans.

Ballyshannon

Ballyshannon has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Bridgend

Bridgend has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Carndonagh

Carndonagh was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Carndonagh Flood Relief Scheme Option 1, comprising storage, hard defences and improvement of channel conveyance, to project level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the Planning Authority will have due regard to the CFRAMS Carndonagh Flood Extents mapping where necessary in the assessment of planning applications during the life of the LAP. Figure 7.2 sourced from OPW CFRAMS study shows the probability of flood extents within the town centre in Carndonagh and further mapping for the outer areas of the town can be viewed at www.maps.opw.ie/floodplans.

**APPENDIX C- Submission refs. and names in relation to
St. Catherine's Well Area / Immediately Adjoining
Harbour Complex**

Table C1: Submissions generally not in support of Draft LAP Zoning

Ref. No.	Forename	Surname (Organisation/Group if any)
KB10	Eimear	Stafford (Sinbad Offshore Support Ltd)
KB11	Arthur	McMahon (Donegal Oil Company)
KB12	Francis	O'Donnell (Irish Fish Producers Organisation)
KB13	Lee	Mooney (Mooney Boats Ltd)
KB14	Brian	Leslie (Seaquest Systems)
KB15	Mary	Howley (Bio-Marine Ingredients Ltd)
KB16	Sean	Ward (Sean Ward (Fish Exports) and Sean Ward (Transports Ltd))
KB17	Martin	McGuinness (MMG Welding)
KB18	Tony	McGowan (North West Marine Pilots Ltd)
KB19	Diarmuid	Barry (DP Barry & Co)
KB20	David	Kiely (Sinbad Marine Services Ltd)
KB21	Noel	Mc Ging (Olgarry Fishing Company)
KB22	Conal	Gallagher (Con Gallagher Marine Ltd)
KB23	Michael	Cavanagh (KFO Ltd)
KB24	Danny	Gallagher (KT Nets)
KB25	Tony	Byrne (B&D Fishing Co. Ltd)
KB27	Kevin	McGee
KB28	Barry	Sharkey (Northwest PV)
KB29	Paul	McDevitt
KB30	Brian	McMonagle (McMonagle Marble & Granite)
KB133	Evelyn	Kierans (Swat Net Gundry Ltd)
KB134	Sean	O'Donoghue (KFO Ltd)
KB137	John J	O'Shea (O'Shea Fishing Company)
KB139	Philip	Cavanagh (Cavanlee Fishing)
KB140	Catherine	Smyth (McMonagle Marble & Granite)
KB141	Cathal	Boyle (CBS Security)
KB720	Claire	Tully on behalf of 1. Western Seaboard Fishing Co. Ltd 2. Killybegs Fishing Enterprises Ltd 3. Westward Isle Fishing Ltd 4. Carmarose Trawling Co. Ltd 5. Colmcille Fishing Ltd
KB721	Gary	Quinn (Quinn Crane Hire Ltd)
KB722	John	McGuinness (Killybegs Sea Foods (KSF))
KB274	Lee	Mooney (Killybegs Harbour Development Group)
KB728	Marty	McGing (Mate MFM Olgarry)

Submissions Received to Draft LAP 2018-2024

KB808	Anne	Dorrian, (Chairwoman of Killybegs Information Centre)
KB822	Tony	Byrne (Norfish Ltd)
KB825	Sean	O'Donoghue (Chief Executive of Killybegs Fishermen's Organisation Ltd)
KB827	Eamon J	McHugh (Antarctic Fishing Co Ltd)
KB838		Dept. of Agriculture, Food and the Marine.

Table C2: Submissions generally in support of Draft LAP Zoning

Ref. No.	Forename	Surname (Organisation/Group if any)
KB2	Valerie	Kelly
KB4	Arthur	Kee
KB5	Gary	Anderson
KB26	Derek	Vial
KB31	John	Conaghan
KB32	Sinead	Kelly
KB33	Alana	Keeney
KB34	Damian	Keeney
KB35	Rosaleen	McGuinness
KB36	P.Eddie	McGuinness
KB37	Shane	McGlynn
KB38	Andrew	Cassidy
KB39	Patricia	Joyce
KB40	Ann	Harvey
KB41	Paddy	McGuinness
KB42	Mary	Logue
KB43	Alanna	O'Donnell
KB44	Christhoper	Fallon
KB45	Martin	McHugh
KB46	Pat	Logue
KB47	Pauric	Logue
KB48	Seamus	Kelly
KB49	Derek	Logue
KB50	A	McGroarty
KB51	Kitty	Harvey
KB52	Paul	McHugh
KB53	Lisa	Gallagher

Ref. No.	Forename	Surname (Organisation/Group if any)
KB54	Kerrie	McHugh
KB55	Evelyn	McHugh
KB56	Teresa	Kenny
KB57	Anna	Burke
KB58	Paul	Burke
KB59	Christhoper	Burke
KB60	Eamon	Kelly
KB61	Eileen	Kelly
KB62	John	Watters
KB63	Eamon	Kelly
KB64	Caroline	Kelly
KB65	John	Kelly
KB66	Paul	McCullagh
KB67	John	Ritchie
KB68	John	Burke
KB69	PJ	Campbell
KB70	Seamus	Meehan
KB71	Mary	Kennedy
KB72	Tony	Meehan
KB73	Mary	Devlin
KB74	Breda	Burke
KB75	Des	McGroarty
KB76	Anne	Fallon
KB77	Donna	McGroarty
KB78	Paul	Kelly
KB79	Johanne	Kelly
KB80	Conal	Walters
KB81	Shane	O'Donnell
KB82	Anthony	Melly
KB83	Michael	Melly
KB84	Lena	Watters
KB85	Philomena	Melly
KB86	Hugh	Melly
KB87	Eamon	Doherty
KB88	Donna	Hyland
KB89	Sean	O'Donnell

Ref. No.	Forename	Surname (Organisation/Group if any)
KB90	John	Mitchell
KB91	Daniel	Melly
KB92	Arlene	Melly
KB93	Tom	O'Keefee
KB94	Thomas	Furey
KB95	John	Ward
KB96	Conal	Melly
KB97	Dareena	Melly
KB98	John	Reilly
KB99	Sean	Morris
KB100	Patrick	O'Donnell
KB101	Helen	O'Donnell
KB102	Anne marie	Sheerin
KB103	Jayne	Diamond
KB104	Bridie D	Kelly
KB105	Karen	Kelly
KB106	Shaun	Kelly
KB107	Donal	O'Donnell
KB108	Raymond	McGlynn
KB109	Michael	McGlynn
KB110	Dermot	McGlynn
KB111	Daniel	McGlynn
KB112	Aisling	Byrne
KB113	Gemma	Byrne
KB114	Pat	Boyle
KB115	Ciaran	Conaghan
KB116	Sean	Murphy
KB117	Maureen	Gallagher
KB118	Francis	Gallagher
KB119	Genevieve	O'Donnell
KB120	Cormac	Conaghan
KB121	Anita	Kelly
KB122	Margaret	Murphy
KB123	Maire	O'Donnell
KB124	Daniel	O'Donnell
KB125	Catherine	O'Donnell

Ref. No.	Forename	Surname (Organisation/Group if any)
KB126	Sheena	O'Keefee
KB127	Brid	O'Keefee
KB128	Moya	McGlynn
KB129	Mairead	Murphy
KB130	Ted	Kelly
KB131	Derek	Vial (Killybegs History & Heritage Committee)
KB135	Hugh	Boyle (Maghera Heritage Group)
KB143	Derek	Vial
KB155	Veronica	Conway
KB171	James Gerard	Gillespie
KB172	Aindreas	Mac Giolla Easbuig
KB174	Donald	Maclean
KB175	Roisin	Tweed
KB176	Randal	O'Logue
KB177	Kevin	White
KB178	Bill	Shovlin
KB179	Brid	McGettigan
KB180	Des	Foy
KB181	Elaine	Gavigan
KB182	Sheila	Gallagher
KB183	Helena	Gavigan
KB184	Anne	Kinsella
KB185	John	O'Sullivan
KB186	Gary	Murrin
KB187	Joe	Smith
KB188	Patricia	Murrin
KB189	Lorraine	MacClean
KB190	Celine	Conaghan
KB191	Mary	Curran
KB192	Jimmy	O'Donnell
KB193	Shaun	Murrin
KB194	Louise	Cunningham
KB195	Shane	Murrin
KB196	Peter	Breslin
KB197	Kathleen	McGuinness
KB198	Michael	O'Donnell

Ref. No.	Forename	Surname (Organisation/Group if any)
KB199	Mick	O'Donnell
KB200	George	Dummigan
KB201	Sheila	Eccles
KB202	Dymphna	Kennedy
KB203	Niall	Erskine
KB204	Elizabeth	O'Carroll
KB205	Mary	Williamson
KB206	Marion	McGuinness
KB207	Celia	Illegible
KB208	Dermot	Boyle
KB209	Peg	Murrin
KB210	Rachel	O'Neill
KB211	Brian	McCabe
KB212	Mary	Harkin
KB213	Shane	Molloy
KB214	Gary	Shovlin
KB215	Illegible	Bryson
KB216	Maeve	McGowan
KB217	Fiona	Sweeney
KB218	Mary	Murrin
KN219	Aisling	Murrin
KB220	Rita	Nolan
KB221	Derek	McCloskey
KB222	John	Shovelin
KB223	Jimmy	Herbert
KB224	Bernie	Illegible
KB225	Theresa	Quinn
KB226	Charles	Boyle
KB227	Lorraine	McBrearty
KB228	Paudie	Rowan
KB229	Breege	Haughey
KB230	Kathleen	Burn
KB231	Joan	McCloskey
KB232	John James	McCloskey
KB233	Aileen	Boyle
KB234	Conor	Conaghan

Ref. No.	Forename	Surname (Organisation/Group if any)
KN235	Hughie	McFadden
KB236	Edward	McCallig
KB237	Arthur	Meehan
KB238	Claire	Boyle
KB239	Caitlin	Gallagher
KB240	Ethna	Gallagher
KB241	Kevin	McCann
KB242	John	Carroll
KB243	Anne	Connelly
KB244	Eilis	Connelly
KB245	Shaun	Connelly
KB246	Sharon	Murrin
KB247	Jimmy	Murrin
KB248	Mary	Murrin
KB249	Paul	Murrin
KB250	Christine	Smith
KB251	Arthur	Ristead
KB252	Jolinta	Cunningham
KB253	Davina	Cunningham
KB254	Conal	Cunningham
KB255	Francis	Murrin
KB256	Michael	Rice
KB257	Mairead	Gallagher
KB258	Faustina	McFadden
KB259	Flor	Illegible
KB260	Mary	Faherty
KB261	Patricia	Faherty
KB262	Gerard	Faherty
KB263	Catherine	Faherty
KB264	Ann	Conaghan
KB265	Sonia	Morrow
KB266	David	Boyle
KB267	Annie	Gallagher
KB268	Tracey	Boyle
KB269	Evelyn	Cunningham
KB270	Anthony	McBrearty

Ref. No.	Forename	Surname (Organisation/Group if any)
KB271	Ailbhe	Cunningham
KB272	Hugh	Smith
KB273	Brian	Smith
KB274	Mary	Smith
KB275	Yvonne	Byrne
KB276	James	Cunningham
KB277	Patricia	Cunningham
KB278	Bill	Johnston
KB279	Mary	Boyle
KB280	Celine	Cunningham
KB281	Sarah	Smith
KB282	Brian	Dorrian
KB283	Paul	Smith
KB284	James	Cunningham
KB286	Fr. Colm	Galla choir
KB287	Roisin	Breslin
KB288	Deanne	Gallagher
KB289	Noreen	Gallagher
KB290	Veronica	Harley
KB291	Marie	Gallagher
KB292	Marie	Murrin
KB293	Annette	O'Donnell
KB294	Hubert	Breslin
KB295	Michael	McGettigan
KB296	Jackie	Mulroy
KB297	Rosemary	McGettigan
KB298	Hugh John	McFadden
KB299	Anne	O'Donnell
KB300	Ann	O'Donnell
KB301	Moira	Mallon
KB302	Phelim	McGill
KB303	Liam	Byrne
KB304	Eamon	Bonner
KB305	Seamus	McGuinness
KB306	Victor	Fuller
KB307	Colin	Cunningham

Ref. No.	Forename	Surname (Organisation/Group if any)
KB308	Concepta	McGuinness
KB309	Conal	O'Donnell
KB310	P	McBride
KB311	Danny	Harkin
KB312	Eamonn	Maguire
KB313	John	Mooney
KB314	Pat	Cunningham
KB315	Theresa	Blair
KB316	Kevin	Dorrian?
KB317	Conal	McGuinness
KB318	Linda	Curran-Murrin
KB319	James Patrick	McGettigan
KB320	Una	Whincup
KB321	Marian	Barry
KB322	Irene	Gallagher
KB323	Jennifer	Vial
KB324	Ronan	Connaghan
KB325	Lauren	Whimp
KB326	Gary	Reynolds
KB327	Sarah	Byrne
KB328	Claire	Gillespie
KB329	James	McGettigan
KB330	Jacinta	Conneely
KB331	Margaret	Doherty
KB332	Ann	Molloy
KB333	Eamon Og	Molloy
KB334	Eamon	Molloy
KB335	Rannatta	Boylan
KB336	Joanne	McElroy
KB337	Donna	McGettigan
KB338	Terry	McNally
KB339	John	Murrin
KB340	Sean	Byrne
KB341	Angela	Crowley
KB342	Brideen	Gallagher
KB343	James	Gallagher

Ref. No.	Forename	Surname (Organisation/Group if any)
KB344	Pat	Byrne
KB345	James	McGuinness
KB346	Bruce	Vial
KB347	Laura	Bennett Vial
KB348	John	Cunningham
KB349	Maureen	Gallagher
KB350	Conal	Molloy
KB351	Annaleen	Molloy
KB352	Edel	Gildea
KB353	Mary	Taffe
KB354	Agnes	McGettigan
KB355	Helen	Meehan
KB356	Kathleen	Ayres (Mountcharles Heritage Group)
KB357	Tadhg	Gallagher
KB358	Gillian	Murphy
KB359	Enda	McGuinness
KB360	Anna	Murphy
KB361	Dylan	Murphy
KB362	Heather	James
KB363	Roseanne	Cunningham
KB364	Shane	Melly
KB365	Paul	Kelly
KB366	Karen	Cahill
KB367	Derek	Crowley
KB368	Thomas	McBrearty
KB370	Kathleen	O'Donnell
KB372	Keith	Illegible
KB373	Jimmy	Byrne
KB374	Denis	James
KB375	Orla	Murphy
KB376	Christopher	Williams
KB377	Aiden	Foy
KB378	Charles	Logue
KB380	Anna	Murrin
KB381	Oisin	Cahill
KB382	Emer	Cahill

Ref. No.	Forename	Surname (Organisation/Group if any)
KB383	Brenda	Foy
KB384	Kathleen	McBrearty
KB385	Bridget	McFadden
KB386	Mary	McCloskey
KB387	Grainne	Reilly
KB388	John	Kelly
KB389	Killian	Carr
KB390	John	McFadden
KB391	Demi	McBride
KB392	Roisin	McFadden
KB393	Megan	Kelly
KB394	Luke	Kelly
KB395	Hugh	O'Connor
KB396	Paul	Hurley
KB397	Aidan	Mallon
KB398	Margaret CM	Gallagher
KB399	Daniel	Gallagher
KB400	PJ	Gallagher
KB401	Debbie	McNulty
KB402	Ray	Sheehan
KB403	Marie	Boyle
KB404	Anthony	Breslin
KB405	Anne	McCabe
KB406	Ann	Harkin
KB407	Clare	Gillespie
KB408	Damien	McDyre
KB409	Marian	McGuinness
KB410	Mary	Murrin
KB411	Amay	Conneely
KB412	Hugh	Boyle
KB413	Mark	Conneely
KB414	Imelda	McGuinness
KB415	Helda	Boyle
KB416	Martin	Kelly
KB417	Niall	Campbell
KB418	Niamh	McCallig

Ref. No.	Forename	Surname (Organisation/Group if any)
KB419	Deirdre	Troy
KB420	Illegible	Byrne
KB421	Richard	McCallig
KB422	Pat	Cunningham
KB423	Seamus	O'Donnell
KB424	Kieran	Harvey
KB425	Helena	Cunningham
KB426	Donal	Campbell
KB427	Packie	Cunningham
KB428	Mary	Campbell
KB429	Brian	Campbell
KB430	Mary	Doogan
KB431	Gemma	Byrne
KB432	Moira	Murrin
KB433	Jan	Illegible
KB434	Joan	Carr
KB435	Peter	Leslie
KB436	Teresa	Leslie
KB437	Marian	Conaghan
KB438	Declan	McFadden
KB439	Kathleen	Mulroy
KB440	Cathal	Conaghan
KB441	Catherine	McGuinness
KB442	Christine	Moore
KB443	Brid	Maclean
KB444	Mollie	Ni Dhonnabháin
KB445	Mary	McFadden
KB446	Charlie	Breslin
KB447	Rose	McBrearty
KB448	Mary	Breslin
KB449	Margaret	Breslin
KB450	Joan	Cunningham
KB451	Brid	Burke
KB452	Marian	Breslin
KB453	Aideen	Morrin
KB454	Stephen	Leslie

Ref. No.	Forename	Surname (Organisation/Group if any)
KB455	Siobhan	McBrearty
KB456	Ann	Melly
KB457	Philomena	McCloskey
KB458	Patrick	McCloskey
KB459	Catriona	Murrin
KB460	Patrick	Sharkey
KB461	Jim	Murrin
KB462	Kevin	McGowan
KB463	Paul	Mahon
KB464	Erin	Gildea
KB465	Bridie	Molloy
KB466	Regina	McNern
KB467	Karen	Devine
KB468	Niall	O'Sullivan
KB469	Noeleen	Llewellyn
KB470	Ann	Harvey
KB471	Donal	Whelan
KB472	Derek	Carole
KB473	Christine	Carolan
KB474	Brian	Kennedy
KB475	Mary	Whelan
KB476	Tracey	Carr
KB477	Michael	Melly
KB478	Brendan	White
KB479	Pat	Connaghan
KB480	Pauric	Conaghan
KB481	Eamon	Gavigan
KB482	James	Gavigan
KB483	Mary	Connaghan
KB484	Anne Marie	Moore
KB485	Frankie	Gallagher
KB486	Sean	McNern
KB487	Irene	McNern
KB488	Ciaron	Nolan
KB489	Shay	Murrin
KB490	Michelle	McKenzie

Ref. No.	Forename	Surname (Organisation/Group if any)
KB491	James	Byrne
KB492	Loretta	Friel
KB493	Mary	Ryan
KB494	Sabrina	Noctor
KB495	Kathleen	McCabe
KB496	Breada	Dolan
KB497	Gerry	McCabe
KB498	Paul	Byrne
KB499	Elaine	Murrin
KB500	Michelle	Murrin
KB501	Mary	Pollock
KB502	Jim	Boyle
KB503	Jamie-Lee	Milsop
KB505	Andrea	O'Donnell
KB506	Kevin	Keeney
KB507	Patricia	Dovey
KB508	Sandra	Loftus
KB509	Paul	Jordan
KB510	Kevin	Loftus
KB511	Catherina	McGroary
KB512	Jonathan	Jordan
KB513	Patsy	Meehan
KB514	Rose	Meehan
KB515	Emily	McBrearty
KB516	Katelyn	McBrearty
KB517	Steve	Miller
KB518	Alan	McBrearty
KB519	Lorraine	McBrearty
KB520	Evelyn	Harvey Cassidy
KB521	Michael	Faherty
KB522	Noreen	Faherty
KB523	Conal	O'Donnell
KB524	Marie	Byrne
KB525	Pauric	Connaghan
KB526	Bryan	Gallagher
KB527	Noel	Breslin

Ref. No.	Forename	Surname (Organisation/Group if any)
KB528	David	Breslin
KB529	Carol	Breslin
KB530	Sarah	Breslin
KB531	Ultan	Breslin
KB532	Manus	Crampsey
KB533	Daniel	McGee
KB534	Diane	Crampsey
KB535	Eimear	Keeney
KB536	Laura	Keeney
KB537	Maggie	Keeney Tullyhoniver
KB538	John	Keeney
KB539	Fergus	Melly
KB540	Mary P	Molloy-Goretti
KB541	Declan	Haughey
KB542	Conal	Breslin
KB543	Stephen	Breslin
KB544	Shae	Curran
KB545	Mary	Arundoll
KB546	Barbara	Curran
KB547	Caroline	McKenna
KB548	Peter	Curran
KB549	Sean	Loughrey
KB550	Mairead	Curran
KB551	Brendan	Breslin
KB552	Austin	Breslin
KB553	Pauric	Breslin
KB554	Gary	Breslin
KB555	Corey	Byrne
KB556	Sinead	Gallagher
KB557	Kathy	Mulllan
KB558	Bridie	Moore
KB559	Pat	O'Donnell
KB560	Kathleen	O'Donnell
KB561	Rosaleen	Mulllan
KB562	Maeve	Murray
KB563	George	Murray

Ref. No.	Forename	Surname (Organisation/Group if any)
KB564	Peter	Mullan
KB565	Shane	McKenna
KB566	Mark	Devlin
KB567	Dearbhla	Diver
KB568	Jessica	Kelly
KB569	Kathleen	McGroary
KB570	Illegible	Keane
KB571	Leanne	Brosnan
KB572	Ciara	Randals
KB573	Anne	Brosnan
KB574	Caithriona	Byrne
KB575	Seamus	Byrne
KB576	Eileen	McCloskey
KB577	Jacinta	Byrne
KB578	Tom	Brosnan
KB579	Cian	Brosnan
KB580	Sean	Sills
KB581	Brita	Breslin
KB582	Shaun	Keeney
KB583	Patricia	Keeney
KB584	Esther	Molloy
KB585	Breege	Haughey
KB586	Sharon	Boyle
KB587	John	Boyle
KB588	Pamela	McCollum
KB589	Linda	McCollum
KB590	Michael	Loftus
KB591	Elish	McCollum
KB592	Michael	Jordan
KB593	John	Jordan
KB594	Marian	Jordan
KB595	Ann	Jordan
KB596	Phyllis	Melly
KB597	Eugene	McBrearty
KB598	Rose Ann	O'Donnell
KB599	Cliona	Coughlan

Ref. No.	Forename	Surname (Organisation/Group if any)
KB600	Daniel	McKeever
KB601	Corney	O'Donnell
KB602	Margaret	Boyle
KB603	Pauric	McNern
KB604	Daniel	Hegarty
KB605	Laura	Hegarty
KB606	Dave	Byrne
KB607	Pauric	McInern
KB608	Kathleen	Cassidy
KB609	Brooke	McNern
KB610	Keith	Johnston
KB611	Kathleen	McGinty
KB612	Andrew	Rodger
KB613	Linda	Rodger
KB614	Garry	Dongan
KB615	Teresa	Gordon Byron
KB616	Jenny	McCollum
KB617	David	Johnston
KB618	Marie	Kelly
KB619	Eileen	Curran
KB620	John	Byrne
KB621	Trevor	Shaw
KB622	Hugh	O'Hagan
KB623	Marie	McGuinness
KB624		(Saint Catherines Well Committee)
KB625	Seamus	Illegible
KB626	James	McGuinness
KB627	Dermot	McGuinness
KB628	Danny	Gallagher
KB635	Grace	Breslin
KB636	Kevin	Boyle
KB637	Nicole	Boyle
KB638	Rhiannon	Boyle
KB639	Deborah	Curran
KB640	Shane	Boyle
KB641	Ronan	Boyle

Ref. No.	Forename	Surname (Organisation/Group if any)
KB642	John	Boyle
KB643	Rose	Boyle
KB644	Jim	Boyle
KB645	Shaun	Cannon
KB646	Roisin	Boyle
KB647	Charlie	Diver
KB648	Eimear	Diver
KB649	Brendan	Boyle
KB650	Gary	Lafferty
KB651	Jamie	Kelly
KB652	Ciaran	Nolan
KB653	John	Callaghan
KB654	Olivia	Broderick
KB655	Jimmy	McGroary
KB656	Denise	McGroary
KB657	Tommy	O'Doherty
KB658	Mairead	Fólan
KB659	Cait	Ni Chualain
KB660	Daniel	McAndrew
KB661	Roisin	McAndrew
KB662	Eoin	Fólan
KB663	Eileen	Diver
KB664	Nuala	Boyle
KB665	Kevin	Boyle
KB666	Donal	Breslin
KB667	Dennis	Arundell
KB668	Grainne	Harte
KB669	Eileen	Curran
KB670	John	McIntyre
KB671	Sandra	McGroary
KB672	Martin	Furey
KB673	John	Kelly
KB674	John	Kelly
KB675	Conor	Quinn
KB676	James	Rodgers
KB677	P.J.	Kelly

Ref. No.	Forename	Surname (Organisation/Group if any)
KB678	Bernie	Higgins
KB679	Pamela	O'Donnell
KB680	Anna	O'Donnell
KB681	Alanna	O'Donnell
KB682	Tom	Illegible
KB683	Patricia	Doogan
KB684	Aoibhinn	McCay
KB685	Donna	McCay
KB686	Sarah	McGonigle
KB687	Eilish	McNern
KB688	Trevor	McNern
KB689	Carmel	Gallagher
KB690	Jack	Gordan
KB691	Gary	McNern
KB692	Martin	McNern
KB693	Bryan	Murrin
KB694	Janet	Murrin
KB695	Niamh	McCay
KB696	Martin	Quinn
KB697	Dawn	Morriss
KB698	Kirsten	McBrearty
KB699	Alfie	Dovey
KB700	Danny	Haughey
KB701	Louise	Davidson
KB702	Patricia	Miller
KB703	Megan	Quinn
KB704	Aidan	Haughey
KB705	Callum	Quinn
KB706	Theresa	Quinn
KB707	Margaret	Cassidy
KB708	Clare	Johnston
KB709	Ursula	Hegarty
KB710	Dara	Hegarty
KB711	G.	Kerrigan
KB712	Celine	Hegarty
KB713	Anna	Kerrigan

Ref. No.	Forename	Surname (Organisation/Group if any)
KB714	Shane	Hegarty
KB715	Tanya	Haughey
KB716	John	Johnston
KB717	Ciara	McGuinness
KB719	Paula	Harvey (Ardara GAP Heritage and Historic Group)
KB729	Noreen	Connell
KB730	Bernie	McTeague
KB731	Frank	McTeague
KB732	Karen	McTeague
KB733	Carole	Lynch
KB734	Anne	Lynch
KB735	John	Greenlaw
KB736	Emer	McGuinness
KB737	Mary	Lafferty
KB738	Shaun	McLaughlin
KB739	Michael J	Cunningham
KB740	Brid	Callaghan
KB741	Joan	Greenlaw
KB742	Grainne	McBrearty
KB743	Joseph	O'Donnell
KB744	Paul	McTeague
KB745	Darren	McGuinness
KB746	Gerard	McGuinness
KB747	Celine	Cunningham
KB748	Colm	Connelly
KB749	Gerard	McBrearty
KB750	Mary	McBrearty
KB751	Alan	Lafferty
KB752	Eugene	McBrearty
KB753	Martin	McBrearty
KB754	Mary	McGlinchey
KB755	Mrs Philomena	McGuinness
KB756	Joan	McGuinness
KB757	Barry	McGuinness
KB758	J P	McGuinness
KB759	Calvin	Garrihy

Ref. No.	Forename	Surname (Organisation/Group if any)
KB760	Fionnuala	Garrihy
KB761	Neil	Garrihy
KB762	James	McGuinness
KB763	Ultan	McGuinness
KB764	Mrs Margaret	McLaughlin
KB765	Margaret	O'Donnell (nee Meehan)
KB766	Eileen	(O'Donnell) Gillespie
KB767	Lorraine	Herron
KB768	John	Herron
KB769	Catherine	McBrearty
KB770	Helena	Cunningham
KB771	Patrick	McClafferty
KB772	Claire	McGuinness
KB773	Donna	McTeague
KB774	J P	McGuinness
KB775	Christine	Cunningham
KB776	Ronan	Cunningham
KB777	Matthew	White
KB778	Kelly	Illegible
KB779	Stephen	Muirhead
KB780	Mark	Boyle
KB781	John B	Boyle
KB782	Cornelius	Diver
KB783	Ivan	Illegible
KB784	Antoine	O'Hara
KB785	Joe	Pope
KB786	Edel	Cunningham
KB787	Christopher	Cunningham
KB788	Stephen	Murrin
KB789	Breedge	McGuinness
KB790	Marian	Murrin
KB791	Breda	McGuinness
KB792	Martin	McGuinness
KB793	Ryan	McGuinness
KB794	Shauna	McGuinness
KB795	Martin	Carr

Ref. No.	Forename	Surname (Organisation/Group if any)
KB796	Olivia	Carr
KB797		(Killybegs History & Heritage Committee)
KB798	Eugene	Mulligan
KB799	Donna	Mulligan
KB809	Lulu	Chesnutt, (Secretary An Muileann Coirce Leitir)
KB810	Hugh	Boyle
KB811	Paula	Harvey, (Secretary of Ardara GAP Heritage & History Group)
KB812	Sean	O'Beirne, (Chairperson of Killybegs Heritage Committee)
KB814	Seamus	McGinley,
KB833	Kevin	McClafferty
KB836	Patricia	Faherty

**APPENDIX D - Submission refs. and names in relation to
St. Aengus' National School, Bridgend**

Table D1: Names of parties that lodged submissions in relation to the St. Aengus' National School, Bridgend with regard to traffic concerns/speeding.

Ref. No.	Forename	Surname
BE2	Darragh Eileen Sinead Martin	Donaghey
BE3	Louise John Margaret Eamon	Fetherson Fetherson Strain Strain
BE4	Jennifer Junior Marian	Clarke Doherty Clarke
BE5	Aoife Aoife Orla Orla	Doherty Doherty Campbell Campbell
BE6	Illegible Darius Joseph	McColgan
BE7	Clare	Doherty
BE8	Catherine Gary	McGowan Butler
BE9	Cassie Martin Cealeach Victoria	Quintan Quintan
BE10	Pamela R Zara	McDaid
BE11	Joe R	Quigley
BE12	Susan Joanne Gabriel Sean	McColgan Lynch Lynch McColgan
BE13	Maureen S	Hamilton
BE14	Angela Denise Christopher	Campbell Campbell McGee
BE15	Michelle Patrick	Breslin
BE16	Teresa Raymond	Porter
BE17	Elizabeth Caitriona Orla	Doherty O'Murchu Monaghan
BE18	Celia Mark Matthew	Kearns Kearns Doherty

Ref. No.	Forename	Surname
	Oliver Sheila	Kearns Doherty
BE19	Maureen Cathy Sinead Grainne	McLaughlin McDermott O'Toole Deery
BE20	Amanda Kelvin Ciara Linda	Callaghan
BE21	Donagh Martin	McMullan Barr
BE22	M Shaun Illegible M C	McGee McGee Mullan Mullan Mullan
BE23	Paul Karan Ger	Callaghan
BE24	Ava Orla Eva Rhiana	Campbell Campbell Grant Logue
BE25	L x4	Fitzpatrick
BE26	Angela Annemarie Raymond Ronan	Clarke Clarke Wylie Clarke
BE27	Saffron Donna Liam Og Cathal	McDonnell Moore Duffy McDonnell
BE28	Kevin Pauline Alan Lynda	McDermott McDermott Diver Diver
BE29	Jacqueline Patrick Paddy Kathleen	McCann McCann Doherty Doherty
BE30	C Aaron Angela Abbey-Lee	Simpson Deane Gorman Deane
BE31	Aidan P.Denis J P Denis	McLaughlin
BE32	Paula Liam	Hirrell
BE33	Cathy Robert	McClay McClay

Ref. No.	Forename	Surname
	David Linda	McClay Doran
BE34	Josephine Rena Mary Joe	McLaughlin
BE35	Stephen Leanne Caroline Grainne	Quinn Quinn Lynch Lynch
BE36	Rachel Liam Valerie	Gillespie Gillespie Illegible
BE37	Illegible P Kathleen Brian	Whoriskey
BE38	Daddy (Seamus) Madeline	O'Donnell
BE39	Pauline Damien	Grant
BE40	D M William John Mary	Moore
BE41	Denise John J William	Moore
BE42	W A Ann Tina Liam	Gallagher Gallagher Smyth Gallagher
BE43	Joanne James Rosemary James	McBrearty
BE44	Stephen	Hegarty
BE45	Laura James Gearld Nuala	Harkin Harkin Gallagher Gallagher
BE46	Aishling Liam Orla Lucy	Strain
BE47	Michael B	Lowth
BE48	Karen Eamon Fiona Odhran	Doherty
BE49	Clare Keith Jade Dylan	Clarke Clarke Connolly Clarke

Ref. No.	Forename	Surname
BE50	Maeve Shane Gretta	Kerrigan Kerrigan Rodgers
BE51	Ciara x 2 Stephen x2	McCracken
BE52	W Deirdre	McGowan
BE53	Emma Derek Ava Molly	Gallagher
BE54	Dawn James	Strain
BE55	Claire Senan	Burgess
BE56	S R A D	Simpson Fairman Fairman Simpson
BE57	Caroline Illegible Leo Kaitlin	Doherty
BE58	Cathal Leahrise Lauren Pauline	Davis
BE59	Nuala Kieran	McDaid
BE60	Caoimhe Conor Cathy Laura	Gallagher Gallagher Carlyle Carlyle
BE61	Rosaleen Seamus Shane	Bradley
BE62	Michelle Declan	McKinney
BE63	Noeleen	McKinney
BE64	Karen	Harkin
BE65	Bernadette Gerard Shauna Kevin Ciara	Glenn
BE66	Chaoleen Charles	Doherty
BE67	Martina	Porter
BE68	Maria R W J Brian	Barron Strain Strain Barron
BE69	Patricia James	Doherty

Ref. No.	Forename	Surname
	Ellie Jonathan	
BE70	Fiona Declan	Bonner
BE71	Emma C Carol	Barron Illegible Barron
BE72	Deirdre John Paul Mary Denise	Moore Illegible Moore Moore
BE73	Ciara	Carlin
BE74	Noreen Kevin	Barr
BE75	Maria Dean Gaoin	McDaid
BE76	T Eimear	Strain
BE77	Emmet	Craig
BE78	Siobhan Illegible	Illegible Illegible
BE79	Bainca Viorel?	Illegible
BE80	A P J Illegible Illegible	Illegible Illegible Illegible Illegible
BE81	M L Joanne C	Connaghton McMonagle O'Donnell Kelly
BE82	Illegible	
BE83	Illegible Illegible	Wallace
BE84	C P S Angela	Illegible Illegible Illegible Bird

**APPENDIX E- Submission refs. and names of parties
that lodged submissions in relation to the Strategic
Residential Reserve lands at Fintra Road Killybegs**

Table E1: Names of parties that lodged submissions in relation to the Strategic Residential Reserve lands at Fintra Road Killybegs

Ref. No.	Forename	Surname
KB6	Rosaleen	McHugh
KB7	Enda	McHugh
KB8	Catherine	McBride
KB9	Nuala	Knox
KB136	Ciara	Sweeney
KB630	John F & karen	Kenny
KB631	Jason	O'Shea
KB632	Mark&Orla	Brogan
KB633	Timothy& Anne	O'Shea
KB718	John J. & Joanne	O'Shea O'Shea
KB723	Barry&Mary	Gell
KB815	Marie	McGuinness
KB816	James	McGuinness
KB817	Tanya	McGuinness
KB820	Marie	McGuinness
KB830	Conor	Knox
KB831	Laura	Knox
KB832	Patrick & Nuala	Knox
KB835	Seamus	Gallagher

**APPENDIX F- Submission refs. and names of parties
that lodged submissions in relation to unspecified
issues**

Table F1: Names of parties that lodged submissions that were Unstated/General

Ref. No.	Forename	Surname
KB147	Mary	Kelly
KB148	Paul	Molloy
KB149	Ian	mcShane
KB150	Ellen	Logue
KB151	Marc	Mannion
KB152	Paul	Griffin
KB153	Randal	Logue
KB154	Blathnaid	Carolan
KB156	Rita	Archibald
KB157	Mairead	McShane
KB158	Linda	O'Sullivan
KB159	Annie	Byrne
KB160	Mandy	Byrne
KB161	Ursula	Byrne
KB165	Brigid	Molloy
KB166	katie	Byrne
KB167	Noelitte	Hanrahan
KB369	Lorraine	Murray
KB371	Mary	Dorrian
KB379	Rosie	Meehan